

EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Juweiya Abdiaziz ALI; A.F.A., a minor; Reema
Khaled DAHMAN; G.E., a minor; Ahmed
Mohammed Ahmed ALI; E.A., a minor; on
behalf of themselves as individuals and on
behalf of others similarly situated,

Plaintiffs-Petitioners,

vs.

Donald TRUMP, President of the United States
of America; U.S. DEPARTMENT OF STATE;
Tom SHANNON, Acting Secretary of State;
U.S. DEPARTMENT OF HOMELAND
SECURITY; John F. KELLY, Secretary of
Homeland Security; U.S. CITIZENSHIP AND
IMMIGRATION SERVICES; Lori
SCIALABBA, Acting Director of USCIS;
OFFICE OF THE DIRECTOR OF NATIONAL
INTELLIGENCE; Michael DEMPSEY, Acting
Director of National Intelligence,

Defendants-Respondents.

Case No.: 2:17-cv-00135-JLR

**DECLARATION OF ELIAS ABDI
IN SUPPORT OF PLAINTIFFS**

1 I, Elias Mohamud ABDI, declare under penalty of perjury as follows:

2 1. I am a United States citizen. I live in Seattle, Washington. I am a taxi and Uber driver.

3 2. I came to the United States as a refugee in about 2009. At that time, I was living in
4 Kenya, but I was born in Somalia. I became a U.S. citizen in March 2015.

5 3. I am married to Nasteho Adan Kulane, since March 10, 2014. We married in Uganda. My
6 wife Nasteho is a citizen of Somalia. We have two children together. Our first son, A.E.M., was
7 born on January 1, 2015, and our second son, M.E.M., was born on September 29, 2016. My
8 wife and our two sons are currently in Kenya, with my mother, while we wait to be together. I
9 have not seen my wife and oldest son since early September 2016, and I have yet to meet my
10 second son. I send money to my family every month, sometimes every fifteen days. I want my
11 family here with me.

12 4. I petitioned for my wife in around May 2014. I submitted her online immigrant visa
13 application (Form DS-260) on August 19, 2015. My wife was interviewed on August 22, 2016 in
14 Nairobi, Kenya and her immigrant visa was approved and issued to her on January 20, 2017. She
15 picked up her immigrant packet on January 23, 2017.

16 5. On Friday, January 27, 2017 around 9:59 p.m. I booked a flight for my wife and infant
17 son (costing close to \$1,400). I did this before I knew about the President's order to stop some
18 people to get in the U.S., targeting people like my wife who is Somalian. My wife went to the
19 airport in Nairobi, Kenya with our infant son, on January 29, 2017, and was told by the Emirates
20 airline crew that they could not take her to the United States because of the ban. I called to so
21 many places asking what was happening. I booked another flight, on January 30, 2017, for my
22 wife and son through Delta Airlines (costing about \$1,900). I asked if I could book the ticket
23 even though there was a ban. I was told if my wife had a valid visa, they could bring her. My
24 wife went to the airport on 1/31, but the airline told her again that they would not take her.

25 6. My family-based petition for my oldest son, A.E.M. was approved on October 21, 2016. I
26 submitted his immigrant visa application (Form DS-260) on November 23, 2016 and was waiting
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1 for his interview in Nairobi, Kenya. I was told he would get an interview in early January, but I
2 have not yet heard from them.

3 7. My wife and two children have never been to the U.S. My wife and my infant son, who
4 has a U.S. citizen passport, were not allowed on the plane twice. I have incurred so much
5 financial hardship because of this. I have spent too much. I did the petition process by myself.
6 This is heartbreaking. I have not been able to get through the embassy.
7

8 8. Today, on January 31, 2017, I received an email about my wife's immigrant visa. They
9 told me it had been revoked because of the ban.

10 9. I did not think this would be possible. I did not believe people were actually going to be
11 affected like this. Asking why I want my family with me is very silly and shameful. There is no
12 need to ask this question. I do not want to be separated from my family. I cannot continue to
13 endure financial and emotional hardship. I have to households to support, here and in Kenya. I
14 need my family with me.

15 10. My family received an exit letter from Kenya. It's going to expire in about 20 days. My
16 wife who is Somalian citizen is not allowed to stay in Nairobi past that permit date.

17 11. Please help stop this injustice. It is not just me or my family who is suffering.
18

19 I declare under penalty of perjury under the laws of the United States the foregoing is true
20 and correct to the best of my information, knowledge, and belief.
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22 Executed on this 31st day of January, 2017, in Seattle, Washington.

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Elias Mohamud ABDI
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