

EXHIBIT H

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,

v.

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 HESAM
MOAZZAMI FARAHANI IN SUPPORT
OF PLAINTIFFS**

1 I, Hesam Moazzami Farahani, declare under penalty of perjury as follows:

2 1. My name is Hesam Moazzami Farahani and I was born in Iran. I am 32 years old and I
3 work as a banker in Los Angeles, California. I've lived in the U.S. since 2010 and I am a
4 naturalized citizen. I became a U.S. citizen in 2016 and it was a proud day for me. I love this
5 country and becoming a citizen made me feel like I officially belonged here.

6 2. My mother's name Simindokht Naghi Zadeh and she is sixty-five years old. My father's
7 name is Mohammadhossin Moazzami Farahani and he is seventy-one years old. My parents are
8 both citizens of Iran. Since I left Iran in 2010, I have only seen my parents twice. Not because I
9 did not want to see them, but because our situation is complicated. It has been tough to be apart
10 from my parents for so long.

11 3. I have three sisters and I am the only son. My parents are elderly and sick. My father
12 suffers from early stage Parkinson's disease and early onset Alzheimer's. My mother has high
13 blood pressure. I am constantly worried about my parents because of their health. As the only
14 son of the family, it is my responsibility to take care of my parents. I see it as my duty to help my
15 family, particularly since I now have the resources to do so. I want my parents to live with me
16 and one of my older sisters in Los Angeles so that we can take care of them as they age.

17 4. I filed I-130 Petitions for my parents shortly after I became a U.S. citizen. I was really
18 eager for my parents to come and reunite with me and my sister in Los Angeles. My sister lives
19 with me and she is recovering from breast cancer and I wanted us all to be together.

20 5. Once my parents' I-130 petitions were approved, we began the process of applying for
21 their immigrant visas. In late November 2016, my parents travelled from Tehran, Iran to Ankara,
22 Turkey for their interview with U.S. immigration officials. Their applications were approved and
23 immigration issued their visas on December 1, 2016. I remember my parents called me after they
24 learned that their visa was approved. They were so excited. My father is normally a very calm,
25 neutral man, but I could hear the excitement in his voice. It sounded like 20 years were added to
26 his life. I felt so relieved knowing that my parents would be able to come and live with me.
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1 6. On December 20, 2016, we bought my parents' airline tickets to travel to the U.S. on
2 March 15, 2017. We decided for them to travel in March so that I had time to try and buy a new
3 house that had more space for my parents to live with me. Right now, I live in an apartment with
4 my sister. We decided on the 15th of March so that we could celebrate Nowruz, the Persian New
5 Year, together as a family. My parents also needed time to wind down their business little by
6 little and to sell one of their homes.
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8 7. In January 2017, I started hearing that Trump might take action to stop people from
9 traveling to the U.S. from Muslim countries. Friends were posting things on Facebook and I was
10 hearing things on the news that made me concerned. I couldn't have imagined that my parents
11 would have been impacted by any sort of ban. They had permission to come to the U.S. and I
12 thought they would be fine. However, I did not want to take any chances. I decided that my
13 parents should try and travel to the U.S. as soon as possible. On January 26, 2017, my parents
14 bought new tickets to come to Los Angeles two days later. Unfortunately, while they were on
15 their way to the U.S., everything changed.

16 8. On January 28, 2017, at approximately 4:10 in the morning my parents boarded a plane
17 in Tehran to begin their journey to Los Angeles. They had a connection in Abu Dhabi. My
18 parents never made it on their flight to Los Angeles. They were scheduled to board Etihad
19 Airways Flight 171, leaving for Los Angeles at 8:45 in the morning on January 28th. However,
20 when they arrived in Abu Dhabi, officials at the airport told them that there was a new law and
21 they could not come to the United States anymore.

22 9. My parents were detained and questioned by U.S. immigration officials in Abu Dhabi.
23 The officers spoke to my parents in a dialect they could not understand very well. The officials
24 said that the American President had signed a law that meant they could not go to the United
25 States. Officials told my parents to sign a piece of paper. The document was in English, which
26 my parents do not speak. My parents did not understand what was happening to them and did
27 what they were told because they trusted the officials. The officials told my parents that signing
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1 the paper was simply proof they were turned away and that it would help them in the future to go
2 to the United States.

3 10. Later that day, my parents sent me a text message telling me that officials told them they
4 could not come to the U.S. and that they had to go back to Iran. My parents told me they were
5 waiting in Abu Dhabi for a flight to Tehran. They told me that immigration officials had them
6 sign a paper and they sent a photo to my phone. I looked at the photo and saw an English
7 language document titled "To Be Completed by Alien When Application for Admission
8 Withdrawn." It was just a snapshot of a single page. I asked my parents why they signed the
9 form and they told me they did not know what they were signing. They said they never wanted to
10 withdraw their application and they wanted to come to America. My parents sounded very sad
11 and worried. I was in shock. It was a very stressful moment for me. I had thought I was going to
12 be reunited with my parents. Instead, I wasn't sure we would be together again.

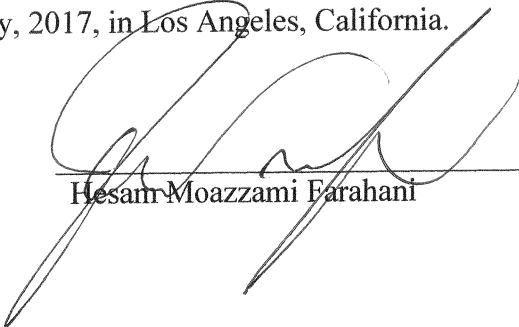
14 11. My parents were at the airport in Abu Dhabi for approximately 18 hours. During their
15 detention, they were cold, uncomfortable, confused, and scared. My sister and I were panicking.
16 We did not know what to do. Eventually, my parents boarded a plane and were sent back to
17 Tehran. My father said it was the worst day of his life. It was also one of my worst days too. I
18 felt pressure and pain in my chest. I was so upset and confused.

19 12. My parents are still in Tehran. My whole life is on hold now. I can't sleep at night. I have
20 had to take off work because I cannot focus. All I can think about is my family. My parents are
21 worried. When I talk to them on the phone, all they want to know is what is going to happen next
22 and when they can come to the United States. My mother told me she is having trouble sleeping.

23 13. January 28, 2017 was supposed to be the start of a new, happy chapter for my family. We
24 spent a lot of money, time, and effort into getting my family's papers in order so they could
25 come here. I feel discriminated against and like a second class citizen because of where I was
26 born. It hurts. All I want is for my parents to be here with me.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct to the best of my information, knowledge, belief.
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5 Executed on this 2nd day of February, 2017, in Los Angeles, California.
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Hesam Moazzami Farahani