

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

STATE OF HAWAII,

Plaintiff,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States;
U.S. DEPARTMENT OF HOMELAND
SECURITY; JOHN F. KELLY, in his
official capacity as Secretary of Homeland
Security; U.S. DEPARTMENT OF
STATE; REX TILLERSON, in his
official capacity as Secretary of State; and
the UNITED STATES OF AMERICA,

Defendants.

Civil Action No.

**DECLARATION OF DOUGLAS S. CHIN IN SUPPORT OF PLAINTIFF’S
MOTION FOR TEMPORARY RESTRAINING ORDER**

I, DOUGLAS S. CHIN, hereby state and declare as follows:

1. I am Attorney General for the State of Hawai‘i. I have personal
knowledge of and am competent to testify to the truth of the matters stated herein.

This Declaration is submitted in support of Plaintiff’s Motion for Temporary
Restraining Order (the “Motion”), filed concurrently herewith.

2. Pursuant to Federal Rule of Civil Procedure 65(b), on February 3, 2017, I called the office of the United States Attorney for the District of Hawai‘i to provide notice of the State’s intention to file the Motion later the same day.

3. In addition to the foregoing, I caused a member of my staff to deliver a copy of the Complaint and Motion papers in this proceeding to the United States Attorney for the District of Hawai‘i, and to mail a copy of the same documents by certified mail to the Attorney General of the United States.

4. Attached as Exhibit A is a true and correct copy of a declaration submitted by a naturalized U.S. citizen who resides in Hawai‘i. He originally is from one of the seven countries targeted by Defendant Donald J. Trump’s Executive Order of January 27, 2017 (the “Executive Order”), which is the subject of the Motion. Exhibit A is highly confidential and submitted for in camera review, pursuant to Local Rule 10.2 and the concurrently filed *Ex Parte* Motion for In Camera Review of Exhibits A, B, and C to Declaration of Douglas S. Chin in Support of the Motion.

5. Attached as Exhibit B is a true and correct copy of a declaration submitted by a lawful permanent resident of the United States who resides in Hawai‘i. He originally is from one of the seven countries targeted by the Executive Order. Exhibit B is highly confidential and submitted for in camera review, pursuant to Local Rule 10.2 and the concurrently filed *Ex Parte* Motion for

In Camera Review of Exhibits A, B, and C to Declaration of Douglas S. Chin in Support of the Motion.

6. Attached as Exhibit C is a true and correct copy of a declaration submitted by a foreign national residing in Hawai‘i. Exhibit C is highly confidential and submitted for in camera review, pursuant to Local Rule 10.2 and the concurrently filed *Ex Parte* Motion for In Camera Review of Exhibits A, B, and C to Declaration of Douglas S. Chin in Support of the Motion.

7. Attached as Exhibit D is a true and correct copy of the Declaration of Risa E. Dickson, Vice President for Academic Planning and Policy at the University of Hawai‘i system, addressing the impacts of the Executive Order on the University of Hawai‘i community, including with respect to limiting travel, hindering diversity of thought and experience, reducing the free flow of information and ideas, and undercutting the welcoming values of the nation and State.

8. Attached as Exhibit E is a true and correct copy of the Declaration of Luis P. Salaveria, Director of the State of Hawai‘i Department of Business, Economic Development and Tourism, addressing the impacts of the Executive Order on the tourism industry in Hawai‘i, including with respect to collaborative projects, economic sister-state relationships, and tourism branding abroad.

9. Attached as Exhibit F is a true and correct copy of the Declaration of George Szigeti, President and Chief Executive Officer of the Hawai‘i Tourism Authority (“HTA”), providing and explaining data maintained by HTA for the last five years with respect to visitor expenditures, total visitor arrivals and mode of transport, and flow of visitors from Africa and the Middle East.

10. Attached as Exhibit G is a true and correct copy of the Declaration of Ross Higashi, Deputy Director for the Airports Division, Department of Transportation, State of Hawai‘i, addressing the federal Department of Homeland Security, U.S. Customs and Border Patrol (“CBP”) requirements for International Arrival Buildings, and the State’s efforts so to qualify international airport facilities within Hawai‘i.

11. Attached as Exhibit H is a true and correct copy of the Declaration of Ismail Elshikh, PhD, a U.S. citizen who resides in Hawai‘i. He is of Egyptian descent and a community leader, as the Imam of the Muslim Association of Hawai‘i. He and his family have been personally affected by the Executive Order, including with respect to interrupted travel plans and separation from family members abroad.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Honolulu, Hawai‘i, February 3, 2017.

/s/ Douglas S. Chin
Douglas S. Chin