

EXHIBIT F

STATE OF TEXAS §
 §
COUNTY OF DALLAS §

DECLARATION OF ALLEN R. VAUGHT

My name is Allen R. Vaught, and I declare as follows:

1. “I am over the age of twenty-one years, of sound mind, and competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct. I am a United States citizen and currently reside in Dallas, Texas.

I. My Iraq Deployment and Working with “Sam” as a Translator for the U.S. Army

2. In April 2003, I deployed to Iraq as a captain in the United States Army Reserve’s Civil Affairs and Psychological Operations Command. I was initially attached to the 3rd Armored Cavalry Regiment (“3rd ACR”), and we were among the first U.S. troops to enter Fallujah, Iraq. My first assignment was to establish and operate civil-military operations focused on establishing local government and stability in Fallujah.

3. Once in Fallujah, I was also responsible for hiring Iraqis to serve as translators for my soldiers and me in addition to other U.S. soldiers in the area. One of the translators I interviewed and hired was Mr. Abdulsalam Mohammed Jameel, or “Sam” as he has been known to me for the past 14 years. I was responsible for all aspects of interviewing, vetting, and paying translators like Sam in the early weeks of Operation Iraqi Freedom. Sam met our initial criteria for working as a translator alongside U.S. military forces, and was a capable and loyal assistant to U.S. forces thereafter.

4. In fact, Sam was one of the first Iraqis to volunteer to work as a translator for us. Although the pay for translators was extremely low (as I recall, about \$5.00 per day at the time), and the dangers for Iraqis working with U.S. forces extremely high, Sam never missed a mission and never complained. At that time, Iraqi translators did not live with us in our forward operating

bases, and they did not have body armor or weapons. Instead, at the end of a mission, they were left to go back to their homes without any personal defense. I had several translators who were executed for working with us to rebuild Iraq. Despite the known dangers, Sam never wavered in his loyalty to U.S. military forces, and faced the same dangers, and more, that we faced.

5. After serving about six months in Fallujah, I was transferred to Sadr City, Baghdad, Iraq and attached to the 2nd Armored Cavalry Regiment. I continued to perform civil-military operations, but with a focus on countering the rising influences of Muqtada Al-Sadr, and his Shi'a militia Mahdi Army. Eventually, I was injured by an IED and small arms fire ambush in Sadr City that was executed by the Mahdi Army. Sam got word of my injury from other soldiers that were still serving in Fallujah. Although he was Sunni, Sam traveled the approximate 60 mile distance and braved entering the predominately Shi'a Sadr City to check on me. Although I had many translators in Fallujah, Sam was one of only two translators who made that dangerous journey to check on me.

6. I left Iraq in March 2004, and was medically separated from the Army Reserve in February 2005 due to spinal injuries from the IED in Sadr City. I was honorably discharged. I earned the Purple Heart, and was awarded the Combat Action Badge, Valorous Unit Award (relative to 3rd ACR combat operations in Fallujah), Army Commendation Medal, and Order of the Spur.

II. My Relationship with Sam After My Redeployment from Iraq

7. Although my time in Iraq ended in 2004, Sam and I have stayed in touch over the years, primarily through social media and e-mail. My personal knowledge of Sam is current due to our frequent communications over the past 13 years. I know that Sam continued to work with U.S. military forces as a translator for many years after my redeployment.

8. I have also attempted to help Sam immigrate to the United States. My efforts include submitting a letter of recommendation on his behalf relative to the Direct Access Program for U.S. Affiliated Iraqis. That letter was similar to this declaration in that it provided a verification of Sam's work with U.S. forces, of his character and loyalty to the United States, and that he should be allowed to immigrate to the United States

9. Sam has desired to come to the United States for years. I strongly encourage that the United States Government grant him the necessary approval to come here. Sam poses no threat to the security of the United States and its citizens. Indeed, Sam will be an asset to our nation.

III. My Work with Other Iraqis Who Immigrated to the United States Under the Previous SIV Program and My Willingness to Sponsor Sam

10. My wife, Donna Vaught, and I previously helped two other translators and their families get out of Iraq, and assisted them with getting on their feet once they immigrated to the United States. They were granted permanent resident visas under the SIV program or programs which existed in approximately 2007 to 2008. Like Sam, neither translator posed any risk to the United States, and both translators are now proud United States citizens who teach Arabic to our military forces. In fact, one of those translators is the other Fallujah translator who came with Sam to visit me in Sadr City after the IED ambush mentioned above.

11. My family and I will provide Sam with the same support and guidance once he gets here. Sam can live with my family and me in Dallas, Texas. I have no doubt that Sam will be a similar success story as the two previous translators.

IV. The Military Service Member-Translator Relationship Should be Considered a “Bona Fide Relationship by the United States Government”

12. I believe the relationship between U.S. military service members and their Iraqi translators should be recognized as a “bona fide relationship” as that phrase was recently stated, but not fully defined, by the United States Supreme Court. Any other interpretation of that phrase relative to U.S. military service members and their translators should send a message to those translators, and others that might become translators, that risking their lives, and the lives of their families, to work with the U.S. military is not a good choice from a common-sense perspective. Simply put, Americans should not turn their backs on that relationship.

13. Furthermore, as U.S. military service members have regularly served in combat operations alongside their foreign national translators, what better security assessment can there be other than the opinion of the service member relative to the translator? Sam served alongside me in combat operations in Fallujah. He faced the same risks soldiers like me faced with one exception – we could go home when it was over, but he could not.

14. Because Sam worked loyally with U.S. forces for many years, he is a “marked man” and faces death from both Sunni and Shi’a individuals in Iraq. Sam should be allowed to lawfully immigrate to the United States without further delay.

V. Basis for the Court to Evaluate the Accuracy of My Personal Judgment

15. With regards to my personal judgment, in addition to having served as a commissioned officer in the U.S. Army, I have been a licensed attorney for over 19 years in the state of Texas and for over 11 years in the state of Mississippi. I am an attorney in good standing admitted to practice before the U.S. Court of Appeals for the Ninth Circuit, the U.S. Court of Appeals for the Fifth Circuit, and the U.S. Court of Appeals for the Armed Forces. I am also admitted to practice in each of the four U.S. District Courts in the State of Texas, the U.S.

District Court for the Southern District of Mississippi, the U.S. District Court for the District of Colorado, both U.S. District Courts for the District of Arkansas, the U.S. District Court for the Southern District of Indiana.

16. Furthermore, I served in the Texas House of Representatives from 2007 to 2011 where I represented Texas House District 107. I served as the vice-chairperson for the Texas House Criminal Jurisprudence Committee from 2007 to 2009, and the Texas House Defense and Veterans' Affairs Committee from 2009 to 2011. I was named as Legislator of the Year/received similar awards from non-partisan groups such as the Texas District and County Attorneys Association (state prosecutors), Texas Police Chief's Association, Texas Pediatric Society, Texas Children's Hospital Association, and the Texas PTA.

VI. My Family's Ability to Sponsor and Help Sam in the United States

17. With regards to my financial ability to help Sam if he is given the opportunity to come to the United States, I am the managing attorney of Baron & Budd, P.C.'s employment law department. I was selected as a *Thomson Reuters* "Super Lawyer" in each year between 2012 to 2017. I was selected by the *Texas Lawyer* as "Litigator of the Week" in September 2012. I also own and operate a cattle ranch northwest of Fort Worth, Texas.

18. My family and I have the resources to help Sam get established as a new resident in the United States and are willing to open our home to him as his sponsors. My wife and I have a nine year old daughter and 11 year old son. If I had even a scintilla belief that Sam posed any threat, I obviously would not be willing to let him live in my home with my family, let alone come to the United States. Having served alongside Sam in combat, in addition to staying in contact with him for the past 14 years, I am certain that Sam will have only a positive influence in our nation if allowed to immigrate here.

19. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.”

EXECUTED this 9th day of July, 2017, in the City of Dallas, and the State of Texas.

A handwritten signature in black ink, appearing to read "Allen R. Vaught". The signature is written in a cursive style with a long, sweeping horizontal line extending from the end of the name.

Allen R. Vaught