

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAI'I

STATE OF HAWAI'I and ISMAIL
ELSHIKH,

Plaintiffs,

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. 1:17-cv-00050-
DKW-KJM

SUPPLEMENTAL DECLARATION OF
LUIS P. SALAVERIA

EXHIBIT C-1

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SUPPLEMENTAL
DECLARATION OF LUIS P.
SALAVERIA

SUPPLEMENTAL DECLARATION OF LUIS P. SALAVERIA

I, LUIS P. SALAVERIA, do declare and would competently testify as follows.

1. I am the Director of the State of Hawaii Department of Business, Economic Development and Tourism (DBEDT). I have held this position since December 2014. Prior to this position, I served as the State's Deputy Director of Finance from 2011 to 2014.

2. As Director, I lead DBEDT's efforts to achieve a Hawaii economy that embraces innovation and is globally competitive and dynamic, providing opportunities for all Hawaii's citizens.
3. Through our attached agencies, we also foster planned community development, create affordable workforce housing units in high-quality living environments, and promote innovative job growth.
4. This declaration supplements the declaration I submitted to this Court earlier, dated February 2, 2017. In that declaration, I offered my observations about the potential impact President Trump's executive order, issued January 27, 2017, could have on Hawaii's economy, including our tourism industry. It is my understanding that this original executive order temporarily banned travel from seven Muslim-majority countries.
5. I am aware that on March 6, 2017, President Trump issued a new executive order. This order temporarily bans travel from six Muslim-majority countries, and does not apply to legal permanent residents or other designated, limited, and narrow categories of non-citizens.
6. The observations I made regarding the potential impact the first executive order could have on Hawaii apply just as much to the new executive order. Hawaii's financial and business interests in its tourist economy; Hawaii's well-earned reputation and brand as a place of welcome, inclusivity, and

tolerance; and Hawaii's efforts to position itself as a hub of international business are all threatened by the new executive order in the same manner as they were by the first order.

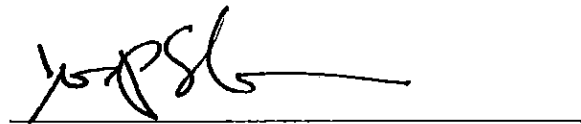
7. I am also aware that the new executive order was issued after weeks of speculation and uncertainty, after the federal government represented on February 16, 2017 that a new order would be issued in the near future. The shifting and uncertain nature of federal policies regarding travel to the United States itself poses a problem for Hawaii.
8. I am aware that the new executive order expands the President's directive to the Department of Homeland Security to conduct a "worldwide review" about what information may be needed from "each foreign country" to determine whether nationals from that country should be granted a visa or otherwise admitted to the United States. I am aware that the executive order envisions a report from the Department of Homeland Security twenty days after the effective date of the order, with an indication of what additional information may be necessary from each country. This has the potential to introduce further uncertainty into planned and future international travel to the United States.
9. Hawaii has millions of visitors annually from all over the world. I expect, given the uncertainty the new executive order and its predecessor have

caused to international travel generally, that these changing policies may depress tourism, business travel, and financial investments in Hawaii.

10. Many of our visitors are tourists who travel here for vacation. Uncertainty regarding the future of federal policies impacting air travel may discourage visitors from undertaking the advance planning typically involved with a Hawaiian vacation. It may also cause would-be visitors to choose other destinations where such uncertainty is not an issue.

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

Executed on the 6th of March, 2017, in Honolulu, Hawaii.

A handwritten signature in black ink, appearing to read 'Luis P. Salaveria', is written above a horizontal line.

Luis P. Salaveria