

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

INTERNATIONAL REFUGEE ASSISTANCE PROJECT, a project of the Urban Justice Center, Inc., on behalf of itself and its clients; HIAS, Inc., on behalf of itself and its clients; ALLAN HAKKY; SAMANEH TAKALOO; JOHN DOES # 1-4; and JANE DOE #1,

Declaration of John Doe #1

Plaintiffs,

v.

DONALD TRUMP, President of the United States; DEPARTMENT OF HOMELAND SECURITY; DEPARTMENT OF STATE; OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE; JOHN KELLY, Secretary of Homeland Security; REX TILLERSON, Secretary of State; and MICHAEL DEMPSEY, Acting Director National Intelligence.

Defendants.

DECLARATION OF JOHN DOE #1

I, [REDACTED], upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am a Lawful Permanent Resident of Iranian origin, and I live in Montgomery County, Maryland.
2. I came to the United States in 2014 on a J1 visa. I am a scientist who studies atmospheric and natural hazards. In 2016, I obtained my lawful permanent resident (LPR) status through the National Interest Waiver program for people whose work concerns an

area of substantial intrinsic merit, is national in scope, and benefits the interests of the United States.

3. In August 2016, while my application to become a lawful permanent resident was pending, I married an Iranian national. My wife and I have applied for a spousal immigration visa for her to join me, submitted to the National Visa Center on January 9, 2017. The application was approved, the processing fees paid, and we were waiting for the embassy interview to be scheduled at the time the Executive Order went into effect.

4. Because of the Executive Order, we are worried that her interview will not be scheduled and she will not get her visa and be permitted to join me in the United States.

5. Even as a LPR, I am fearful of leaving the United States because I fear the Executive Order may prevent my ability to return to my home in Silver Spring, Maryland. I would like to visit my wife in Iran, but I will not make any travel plans because I do not want to risk not being able to return to the United States. Sometimes my work requires me to travel internationally for example to attend conferences, but I feel I cannot do that at this time because I may not be permitted to re-enter the United States.

6. My wife and I are non-practising Muslims but under Iranian law, a child born to a Muslim father is automatically considered to be Muslim. Conversion from Islam is deemed apostasy and is punishable by death.

7. I am very worried that our participation in this lawsuit against federal government officials could jeopardize my wife's visa application and my own plans to naturalize and become a U.S. citizen. We are hopeful that the National Visa Center (NVC) will resume processing applications from Iranian nationals and do not want our participation in this lawsuit to adversely impact her application.

8. I fear that whether or not my wife's visa is denied, my participation in this case could result in harassment of my wife and myself by the Iranian government when I visit her.

9. Because my wife and I are non-practising Muslims, I am fearful that we and our families could be subject to harassment or retaliation in Iran.

10. While participating in this lawsuit is important, I am also fearful that my participation may lead to me and my family being targeted for harassment if my identity were made public.

11. I am aware of the reports indicating that harassment and violence targeting Muslims has been on the rise recently.

12. Moreover, friends/family of mine have told me about the Texas mosque fire and also the Quebec Mosque attack right after the Execution Order was signed.

13. I am also aware of the reports that prominent Muslim activists who have been vocal about speaking up about issues related to anti-Muslim actions have been specifically targeted in social media and other media outlets.

14. For this reason, I feel that my personal security and that of my family necessitates that I be allowed to proceed under a pseudonym.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct. Executed at [REDACTED], Maryland, on February 6, 2017.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

INTERNATIONAL REFUGEE
ASSISTANCE PROJECT, a project of the
Urban Justice Center, Inc., on behalf of itself
and its clients; HIAS, Inc., on behalf of itself
and its clients; ALLAN HAKKY;
SAMANEH TAKALOO; JOHN DOES # 1-
4; and JANE DOE #1,

Declaration of John Doe #2

Plaintiffs,

v.

DONALD TRUMP, President of the United
States; DEPARTMENT OF HOMELAND
SECURITY; DEPARTMENT OF STATE;
OFFICE OF THE DIRECTOR OF
NATIONAL INTELLIGENCE;
JOHN KELLY, Secretary of Homeland
Security; REX TILLERSON, Secretary of
State; and MICHAEL DEMPSEY, Acting
Director National Intelligence.

Defendants.

DECLARATION OF JOHN DOE #2

I, [REDACTED], upon my personal knowledge, hereby submit this
declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am a U.S. citizen of Iraqi origin, and I live in Baltimore County,
Maryland.

2. I came to the United States in 2009 as a refugee along with my wife and two daughters. All of us are now U.S. citizens, as is my third daughter, who was born in the United States.

3. I am a Shiite Muslim, as is my father. My mother is a Sunni Muslim.

4. In 2006, my uncle and cousin were killed in Iraq, after which I also received threats.

5. Three days after my uncle and cousin were killed, I fled to Syria, where I lived for three years. My wife and two daughters joined me in Syria a month later. Because I continued to feel threatened in Syria, I applied for refugee status through the United Nations High Commissioner for Refugees in 2007. My refugee application was approved in 2009, and I arrived in the United States in August 2009.

6. In March 2015, I filed for a family-based I-130 immigration visa for my parents, who were still in Iraq, so they could join me and my family in the United States. My parents had an immigration interview at the U.S. Embassy in Baghdad in September 2016 and their visas were subsequently approved. As of December 2016, their cases were still pending administrative processing.

7. I expected that my parents would be able to join me in the United States early this year, and so they sold their furniture and prepared for their move. However, when I learned about the Executive Order from the news, I realized that this travel ban would prevent my parents from joining me in the United States.

8. I am very worried about my parents' safety. They are in [REDACTED] which is a dangerous part of Iraq. In the past, they have received letters threatening to harm them because they are my parents. My father and mother are currently moving between the houses of various

friends and relatives to ensure they are not targeted. Because of the threats to me and my fear of endangering my family, I am not able to visit them in [REDACTED].

9. I fear that my parents may be harmed in Iraq if the Executive Order continues to block their ability to come to the United States.

10. While participating in this lawsuit is important, especially because it will ensure that my parents are protected, I am also fearful that my participation may lead to me and my family, both in Iraq and in the United States, being targeted for harassment or even violence if my identity were made public.

11. I am aware of the reports of rising harassment of and violence targeting Muslims has been on the rise recently. I have heard on the news about the mosque burnings in Texas, for example. I live in an area of Maryland where there is a lot of support for President Trump, and I am concerned about the reaction of my neighbors if they find out I am participating in this lawsuit. I am particularly concerned about how that could impact my children and my family. I do not want my children to be harassed in school by teachers or students because of my participation in this lawsuit.

12. For this reason, I feel that my personal security and that of my family necessitates that I be allowed to proceed under a pseudonym.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct. Executed at [REDACTED], Maryland, on February 6, 2017.

[REDACTED]

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

INTERNATIONAL REFUGEE ASSISTANCE PROJECT, a project of the Urban Justice Center, Inc., on behalf of itself and its clients; HIAS, Inc., on behalf of itself and its clients; ALLAN HAKKY; SAMANEH TAKALOO; JOHN DOES # 1-4; and JANE DOE #1,

Declaration of John Doe #3

Plaintiffs,

v.

DONALD TRUMP, President of the United States; DEPARTMENT OF HOMELAND SECURITY; DEPARTMENT OF STATE; OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE; JOHN KELLY, Secretary of Homeland Security; REX TILLERSON, Secretary of State; and MICHAEL DEMPSEY, Acting Director National Intelligence.

Defendants.

DECLARATION OF JOHN DOE #3

I, [REDACTED], upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am a Lawful Permanent Resident of Iranian origin, and I live in Anne Arundel County, Maryland.
2. I came to the United States in 2011 through the greencard lottery. My wife, who is also an Iranian national, lives in Iran.

3. In October 2014, I applied for a visa on her behalf. Nineteen months later, in May 2016, my wife had her interview for the visa. She has been in administrative processing with the federal immigration agency since then.

4. I am very worried that our participation in this lawsuit could jeopardize my wife's visa application and my own plans to naturalize and become a U.S. citizen. We are hopeful that the National Visa Center (NVC) will resume processing applications from Iranian nationals and do not want our participation in this lawsuit against federal officials to adversely impact her application in any fashion.

5. I fear that whether or not my wife's visa is denied, my participation in this case could result in harassment of my wife and myself by the Iranian government when I visit her in Iran. Because of our current situation, I canceled plans to visit my wife in February 2017. I am also afraid to travel outside the United States because I fear that I will not be readmitted.

6. While participating in this lawsuit is important, I am also fearful that my participation may lead to me and my family being targeted for harassment if my identity were made public here in the United States.

7. I am aware of the reports indicating a recent rise in harassment and violence targeting Muslims in this country. I know, for example, that a mosque was set on fire by arsonists in Texas the day after President Trump signed his Executive Order.

8. I am also aware of reports that prominent Muslim activists who have been vocal about issues related to anti-Muslim actions have been specifically targeted in social media and other media outlets.

9. In addition, I have since learned that the New York judge who issued an order prohibiting the deportation of foreign nationals otherwise subject to the Executive Order

has had her home phone number and husband's name published on an "alt right" website, along with other derogatory comments about the judge.

10. For these reasons, I feel that my personal security and that of my family necessitates that I be allowed to proceed under a pseudonym.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct. Executed at [REDACTED], Maryland, on February 6, 2017.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

INTERNATIONAL REFUGEE ASSISTANCE PROJECT, a project of the Urban Justice Center, Inc., on behalf of itself and its clients; HIAS, Inc., on behalf of itself and its clients; ALLAN HAKKY; SAMANEH TAKALOO; JOHN DOES # 1-4; and JANE DOE #1,

Declaration of John Doe #4

Plaintiffs,

v.

DONALD TRUMP, President of the United States; DEPARTMENT OF HOMELAND SECURITY; DEPARTMENT OF STATE; OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE; JOHN KELLY, Secretary of Homeland Security; REX TILLERSON, Secretary of State; and MICHAEL DEMPSEY, Acting Director National Intelligence.

Defendants.

DECLARATION OF JOHN DOE #4

I, [REDACTED], upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am a U.S. citizen of Iraqi origin, and I live in Alabama.
2. I immigrated to the United States at the age of 3, and grew up in


[REDACTED] Pennsylvania. My wife, [REDACTED] came to the United States as a refugee, and is now a U.S. citizen. She is expecting our first child and is scheduled for a C-section on February [REDACTED] 2017. Her parents, who currently live in Iraq and have valid immigration visas,

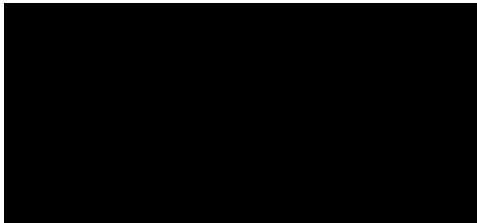
will be unable to come to the United States to witness the birth of their grandchild (my child) if the Executive Order remains in effect.

3. I am a Sunni Muslim, as is my wife.

4. My wife and I are afraid to reveal our names in this lawsuit. For the reasons described in her declaration, we fear that her parents might be targeted if, because of this lawsuit, people in Iraq learn of their connection to the United States.

5. I am also aware that Muslims in the United States are at risk of harassment for their religious and political beliefs, and I am afraid that if I reveal my name in this lawsuit, I could also become a target of the current anti-Muslim sentiment in the United States.

6. I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct. Executed at , Alabama on February 6, 2017.



**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

INTERNATIONAL REFUGEE ASSISTANCE PROJECT, a project of the Urban Justice Center, Inc., on behalf of itself and its clients; HIAS, Inc., on behalf of itself and its clients; ALLAN HAKKY; SAMANEH TAKALOO; JOHN DOES # 1-4; and JANE DOE #1,

Declaration of Jane Doe #1

Plaintiffs,

v.

DONALD TRUMP, President of the United States; DEPARTMENT OF HOMELAND SECURITY; DEPARTMENT OF STATE; OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE; JOHN KELLY, Secretary of Homeland Security; REX TILLERSON, Secretary of State; and MICHAEL DEMPSEY, Acting Director National Intelligence.

Defendants.

DECLARATION OF JANE DOE #1

I, [REDACTED], upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am a U.S. citizen of Iraqi origin, and I live in Alabama.
2. I came to the United States in 2009 as a refugee. I fled from Iraq to Jordan in 2005. Life was very dangerous for me and my family in Iraq, which is why I made the difficult decision to flee: several bombs had exploded in my neighborhood, including one near my elementary school that blew out the glass of my classroom windows, and my brother and

father were exposed to gunfire from armed men who were randomly shooting in their direction. I became a U.S. citizen in 2015.

3. I am a Sunni Muslim, as are my father and my husband. My mother is a Shiite Muslim. My husband was born in Mosul, Iraq. He immigrated to the United States at the age of 3, and grew up in [REDACTED]. He is also a U.S. citizen.

4. I am pregnant, and I am scheduled for a C-section on February [REDACTED] 2017. I filed a family-based IR-5 visa petition for my two parents, who live in Baghdad, in 2016 so that they can come to the United States and be safe. That visa petition was approved, and the visa is valid until May 2017. My parents plan to travel to the United States before the date of the C-section for my baby. If the executive order banning entry from Iraq remains in effect, my parents will not be able to travel to the United States and meet their grandchild.

5. My husband and I are unable to return to Iraq to visit my parents because we are afraid for our safety. When my youngest brother came to America, and people in my parents neighborhood learned of that, someone approached my father and said, "You better hope your son doesn't come back." We understood this to be a threat on his life if he returned to Iraq. In addition, my parents live in a predominantly Shiite neighborhood, and as Sunni Muslims, we would not feel safe there.

6. For these reasons, my husband and I are afraid to reveal our names in this lawsuit. We fear that my parents, who are still in Iraq, might be targeted if people in Iraq are able to identify them and learn, because of this lawsuit, of their relationship to the United States as well as of my father's religion.

7. I have also heard of many instances where Muslims in the United States have been harassed for their religious and political beliefs, and I am afraid that my revealing my name in this lawsuit could make me a target of that kind of anti-Muslim sentiment.

8. I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct. Executed at [REDACTED] Alabama on February 6, 2017.

[REDACTED]