

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

INTERNATIONALREFUGEE
ASSISTANCE PROJECT, et al.,

Plaintiffs,

v.

DONALD TRUMP, et al,

Defendants.

Civil Action No.: 8:17-CV-00361-TDC

DECLARATION OF PAUL HARRISON

I, Paul Harrison, upon my personal knowledge, hereby submit this declaration pursuant 28 U.S.C. § 1746 and declare as follows:

1. I am a United States citizen, and I live in Euless, Texas.
2. My fiancé is an Iranian national who lives in Tehran, Iran. We have been together since November 2015. He was raised Muslim.
3. In March 2016, I petitioned for a K-1 visa for my partner—by then, my fiancé—so he could join me in the United States. He had an interview at the U.S. Embassy in Ankara, Turkey on November 7, 2016.
4. On January 17, 2017, we found out via an email from the U.S. Embassy in Ankara that my partner’s visa processing was complete.
5. On January 27, 2017, President Trump signed Executive Order 13769, entitled “Protecting the Nation from Foreign Terrorist Entry Into the United States,” which barred all Iranian nationals from coming to the United States.

6. On January 30, 2017, we received a subsequent email from the U.S. Embassy in Ankara, stating that my fiancé should not submit his passport because his visa process had been placed on hold until further notice. The email said he should check online and contact the Embassy when the ban was lifted to continue his visa processing.

7. On February 7, 2017, my partner received another email from the Embassy, informing him that he could now submit his passport for the visa because the Department of Justice had informed the embassy of the Washington State court ruling, barring the U.S. government from enforcing certain provisions of Executive Order 13769, including those related to visas and travel.

8. My partner and I made plans to meet in Turkey and to submit his passport for the visa processing. We arrived in Turkey on March 3, 2017. On March 6, 2017, we learned there was a new Executive Order that also barred Iranian nationals from coming to the United States unless their visa had already been issued.

9. We looked at the website of the U.S. Embassy in Ankara to see if there was an instruction not to submit passports because of the new order, but there was no new information. On March 8, 2017, we submitted my partner's passport to the U.S. Embassy in Ankara through an express mail carrier.

10. The Executive Order is creating a significant hardship for me and my partner. I cannot visit him in Iran, given Iran's reciprocal ban on U.S. citizen visitors, and the continued cost of flying to Turkey to be together is a considerable financial hardship.

11. Moreover, homosexuality is a crime in Iran, punishable in some cases by death. My partner has had two incidents with the morality police in Iran who harassed him on one occasion and assaulted him on another. For him, living each day hiding who he is and in

constant fear of exposure for his homosexuality is incredibly emotionally and mentally stressful. He wants the opportunity to live as himself, and I am eager for him to join me here in the United States where we can live openly together as a couple.

12. I am concerned that, even if there is a possibility of a waiver, my partner will have to start this lengthy process over again, and there is no guarantee that he will receive a waiver, even after previously being approved for a visa to the United States. I am also concerned that, as relations deteriorate between the United States and Iran, it will only become more difficult for my partner if the U.S. Embassy requires more information from Iran to process his visa.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct. Executed in Edirne, Turkey on March 10, 2017.

Paul Harrison

Paul Harrison