

1  
2  
3                   **UNITED STATES DISTRICT COURT**  
4                   **WESTERN DISTRICT OF WASHINGTON**  
5                   **AT SEATTLE**

6                   STATE OF WASHINGTON, et al.,  
7  
8                   Plaintiffs,

9                   v.

10                  DONALD J. TRUMP, et al.,  
11  
12                  Defendants.

CASE NO. C17-0141JLR

DECLARATION OF  
RONALD L. ADAMS

I, Ronald L. Adams, hereby declare and affirm as follows:

1. I am over the age of 18 and competent to testify.
2. I am employed by Oregon State University (“OSU”) and serve as Interim Provost and Executive Vice President. I have personal knowledge of the facts set forth in this declaration and I am competent to testify about them.
3. OSU is an international public research university located in Corvallis, Oregon with a presence in every one of Oregon’s 36 counties and a statewide economic impact of over \$2.3 billion. As a land grant institution committed to teaching, research and outreach and engagement, OSU promotes economic, social, cultural and environmental progress for the people of Oregon, the nation and the world. This mission is achieved by producing graduates competitive in the global economy, supporting a continuous search for new knowledge and solutions and maintaining a rigorous focus on academic excellence, particularly in the three Signature Areas: Advancing the Science of Sustainable Earth Ecosystems, Improving Human Health and Wellness, and Promoting Economic Growth and Social Progress.

- 1
- 2     4. The OSU Division of International Programs leads the university's internationalization
- 3         through innovation, service, and collaboration. We collaborate with key stakeholders to
- 4         internationalize the OSU community and seek to provide all learners with access to
- 5         international opportunities and experiences to reveal a path to becoming globally minded
- 6         citizens and promote student success.
- 7     5. Based on the Fall 2016 Enrollment Summary, OSU had an enrollment of 30,354 students
- 8         and 11.6% (3,529) were international students.
- 9     6. International students typically pay full non-resident tuition rates and those 3,529
- 10         international students represent approximately \$85 million in annual gross tuition revenue
- 11         to OSU.
- 12     7. I am familiar with the Executive Order entitled "Protecting the Nation from Foreign
- 13         Terrorist Entry into the United States," which I understand to temporarily bar any person
- 14         entering the United States who is a citizen of any of the following seven countries: Syria,
- 15         Iraq, Iran, Somalia, Sudan, Libya, and Yemen ("the affected countries").
- 16     8. OSU International Programs' current enrollment data shows that of the over 3,500
- 17         international students, approximately 165 current students are citizens of the affected
- 18         countries. These 165 students are here under valid student visas. I believe these 165
- 19         affected OSU students, along with all 3,500-plus international students, enhance the
- 20         educational experience of all students, faculty and staff at OSU.
- 21     9. OSU has approximately 500 international scholars every year. International scholars
- 22         include international faculty and staff, visiting faculty, post-doctoral students, and student
- 23         interns. Approximately 210 of these international scholars are university faculty or staff,
- 24         or visiting faculty.
- 25     10. Because of the Executive Order, students, faculty, and staff are requesting information
- 26         from OSU about how the Executive Order may affect them. These concerns include
- understanding the Executive Order and its lack of clarity in implementation and impact,

1 and understanding immigration civil rights.

2 11. Because of the nature of the Executive Order and the number of students, faculty, and  
3 staff impacted, OSU is responding to its community's needs by: issuing statements  
4 addressing the concerns of students, faculty, and staff; seeking to increase the availability  
5 of an immigration attorney to students seeking services through the Associated Students  
6 of Oregon State University Legal Services; offering a series of community engagement  
7 and educational sessions; providing a website to include frequently asked questions  
8 related to the Executive Order; and working to connect students with additional internal  
9 resources, such as OSU's Counseling and Psychological Services, and external resources,  
10 such as unaffiliated legal immigration resources. As a result, the university is spending  
11 time and resources on its response to the Executive Order, which necessarily takes away  
12 time and resources from other community needs.

13 12. I am aware of an OSU student from one of the affected countries who travelled home to  
14 be married but the student's visa was cancelled under the Executive Order as the student  
15 attempted to return to the United States to continue studies at OSU. The student and the  
16 student's new spouse are experiencing difficulties in obtaining new visas.

17 13. I am aware of an OSU student from one of the affected countries who returned to the  
18 United States with the student's spouse, to continue the student's studies at OSU, only a  
19 few hours before the Executive Order went into effect. The student's spouse is also from  
20 one of the affected countries and the family is concerned that the spouse may be unable to  
21 travel internationally for the spouse's own education because of the spouse's potential  
22 inability to return to the United States and reunite with the family, including the family's  
23 infant child.

24 14. I am aware of an OSU student who is not from one of the affected countries but is from a  
25 Muslim-majority country who postponed an international research trip until there is more  
26 clarity on the Executive Order.

15. I am aware of an individual from one of the affected countries who received an admission

offer letter from OSU who was unable to schedule a visa appointment at a U.S. embassy due to the Executive Order. The student is highly concerned about being able to obtain a student visa in time to begin the student's education at OSU.

16. I am aware of an individual who is a foreign university faculty member from one of the affected countries whose visa interview at a U.S. embassy was cancelled under the Executive Order. As a result, the foreign university faculty member was unable to travel to the U.S. for a scheduled meeting with OSU faculty to discuss curriculum and research in a specialized scientific field.

17. I am aware of OSU student, faculty, and staff concerns related to international travel for education, research, outreach, engagement, and personal reasons, such as to visit family, because of the lack of clarity on the Executive Order.

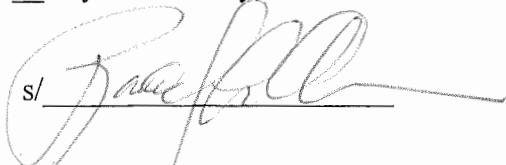
18. I am aware of international students, faculty, and staff from the affected countries and Muslim majority countries experiencing severe distress as to whether they will be able to continue their OSU pursuits.

19. I am concerned about the Executive Order's impacts on the OSU community, including impacts on OSU's students, faculty and staff to continue their OSU pursuits; ability of the OSU community to continue actively engaging in international collaboration; future international student enrollment; and ability of prospective international faculty and staff to accept job offers.

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

22. Executed this 22-day of February, 2017

23  
24  
25  
26



s/ Jake Foll