

# DECLARATION OF EVA HASSETT

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON and  
STATE OF MINNESOTA,

Plaintiffs,

v.

CIVIL ACTION NO. 2:17-cv-00141-JLR

DONALD 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 the Department of  
Homeland Security; REX W.  
TILLERSON, in his official capacity  
as Acting Secretary of State; and the  
UNITED STATES OF AMERICA,

Defendants.

Pursuant to 28 U.S.C. § 1746(2), I, Eva Hassett, hereby declare as follows:

1. I am Eva Hassett, Executive Director of the International Institute of Buffalo (“IIB”). I am responsible for overall financial and programmatic activities of the organization as well as for setting its strategic direction in conjunction with the IIB Board of Directors.
2. I have worked as Executive Director of IIB for over 7 ½ years. I completed my MBA at the Yale University School of Management, and have held senior executive positions in the private, public and nonprofit sectors for the majority of my career. I was the Commissioner of Finance and Administration and Chief of Staff to the Mayor for the City of Buffalo from 1994-2006.

- 1
- 2 3. The International Institute of Buffalo was founded in 1918 to serve immigrant women
- 3 coming to the U.S. with their American soldier husbands after WW1; these “war brides”
- 4 faced cultural and language barriers as well as resistance from the native born
- 5 community, but wanted to integrate into America and start new lives.
- 6
- 7 4. Within 15 years of its founding, IIB expanded to serve immigrant men and families as
- 8 well. IIB has welcomed and supported the integration of 100 years of immigrants to
- 9 Western New York (WNY), including immigrants from Poland, Hungary, Italy, and
- 10 more, long before there was a federal refugee resettlement program. IIB’s mission, now
- 11 99 years after our founding, is to “make Western New York a better place for, and
- 12 because of, immigrants and refugees.”
- 13
- 14 5. IIB’s major service areas at present are: Refugee Services (resettlement, employment,
- 15 community leadership development, receiving community welcoming), Survivor
- 16 Support Services (support for foreign born survivors of domestic violence and any
- 17 survivor of human trafficking), Language Services (interpretation and translation
- 18 services as well as advocacy for the right to language access), and Education and
- 19 International Visitors Services (including cultural competency training).
- 20
- 21 6. As of this writing, IIB has approximately 40 full time employees and an operating budget
- 22 just under \$4 million. Our offices are located at 864 Delaware Avenue in Buffalo, New
- 23 York.
- 24
- 25
- 26

- 1 7. Since its founding, IIB has helped to welcome thousands of refugees and immigrants to  
2 WNY. IIB has participated in the U.S. Department of State refugee resettlement program  
3 (formally called the Reception and Placement program) since the program's inception in  
4 1980. During federal fiscal year 2015-2016 (October 1, 2015 to September 30, 2016), IIB  
5 resettled 352 individuals from all over the world, including refugees from Iraq, the Congo  
6 and Syria.  
7
- 8 8. During that same fiscal year, 5,026 refugees were resettled to New York State; this  
9 represents 5.91% of the total number of refugees resettled nationally in 2015-16. Upstate  
10 NY received 94% of the refugees resettled to New York State; Erie County received 1800  
11 refugees in total in 2015-16 (source: WRAPS data). And in addition to the 1800 refugees  
12 resettled directly in Erie County in 2015-16, approximately 400-500 secondary migrants –  
13 i.e., refugees resettled elsewhere in the US – came to Buffalo. Secondary migrants are  
14 attracted to Buffalo because there are jobs, homes, communities and agencies with case  
15 managers that can help them integrate and become successful.  
16
- 17 9. The March 6, 2017 Executive Order suspending entry into the U.S. based on an  
18 individual's country of origin, religion, and/or refugee status has caused direct and  
19 substantial harm to the refugee and immigrant communities that IIB serves and to the  
20 organization's ability to fulfill its mission to meet their needs.  
21
- 22 10. First, the Executive Order prevents family reunification and, in some instances, strands  
23 vulnerable family members in countries where even the United States has found their  
24 well-being to be in danger. Second, fear and uncertainty surrounding refugees' legal  
25  
26

1 status, rights, and future in the U.S. reintroduces the type of persecutory and government-  
2 instilled fear that caused refugees to flee their countries of origin in the first place. Third,  
3 the reduction in the total number of refugees that the US will accept for the year, and the  
4 resulting cap on refugee admissions, which is cut by 55% in the middle of the federal  
5 fiscal year, constitutes a significant funding cut to IIB as well as to each of the  
6 approximately 300 organizations across the U.S. contracted with and funded by the  
7 federal government to provide refugee resettlement services.  
8

9  
10 11. This loss of funding also represents a significant loss of money that would otherwise be  
11 spent in and have impact on the Western New York economy. The four refugee  
12 resettlement agencies in WNY (Catholic Charities of Buffalo, Journey's End refugee  
13 Services, Jewish Family Service and IIB) rent hundreds of apartments annually for  
14 refugees resettling to the area, using federal refugee resettlement funding. Refugees  
15 resettled to WNY use program funds to buy food, clothing, and bus passes. Eventually,  
16 refugees buy homes and cars. Without refugee resettlement, these funds, and the people  
17 who spend them, will not be in Western New York.  
18

19  
20 12. The Executive Order prevents family reunification; families are often separated during  
21 the refugee application process, because the program does not resettle families together.  
22 Now, family members prevented from traveling due to the Executive Order will be  
23 delayed abroad even longer. After the 120-day suspension, tens of thousands of refugees  
24 who had completed the security screening process will likely no longer be "green lighted"  
25 and will be required to restart the entire screening process again, potentially delaying  
26

1 their travel for years. Furthermore, during this period of delay, the family members may  
2 continue to face the same threats to their safety or official persecution that prompted their  
3 family to seek refugee status in the first place.  
4

5 13. Second, the prospect of sudden changes to and uncertainty surrounding refugees' safety,  
6 rights and future in the U.S. reintroduces the type of government-instilled fear that caused  
7 many to flee their homes to begin with. Refugees are initially given that status by the  
8 United Nations High Commission on Refugees (UNHCR), using the UNHCR definition  
9 of a refugee: "A refugee is someone who has been forced to flee his or her country  
10 because of persecution, war, or violence. A refugee has a well-founded fear of  
11 persecution for reasons of race, religion, nationality, political opinion or membership in  
12 a particular social group." For a refugee to flee persecution, survive, live in a refugee  
13 camp, complete 18-24 months of security screening, and be chosen to resettle to the US  
14 -- then fear they will be persecuted, discriminated against or be the subject of violence,  
15 for the same reasons, is anxiety-producing, fear-inducing and generally re-traumatizing.  
16  
17

18 14. In fact, several hundred individuals who had legal authorization to be in the U.S. have  
19 crossed into Canada over recent weeks, to claim asylum. The refugees and migrant agencies  
20 in Canada attribute the exodus in large part to the recent Executive Order and the fear caused  
21 in non-native communities living in the U.S.<sup>1</sup>  
22  
23  
24  
25  
26

---

<sup>1</sup> <http://www.newsweek.com/canada-border-asylum-seekers-united-states-immigration-566640>

1 15. Refugees undergo multiple security and health screenings before they even become  
2 candidates for resettlement in the U.S. They are vetted by the U.S. Department of  
3 Homeland Security, the FBI, the CIA, and the National Center on Counterterrorism. The  
4 screening process involves background checks, database checks, medical tests, document  
5 validation and revalidation, and multiple in-person interviews. Additional screening is  
6 required for refugees from Syria. Only if refugees pass these screenings are they then  
7 identified as individuals who are eligible for resettlement in the United States.  
8

9  
10 16. The entire security screening process can take up to two years and even longer for  
11 refugees from Syria, especially since not all the required checks are coordinated. In  
12 addition, the validity of one type of screening may expire before another approval comes  
13 through – when this happens, the individual must go through all the screenings again. It  
14 is not unusual for a refugee to go through several rounds of security screenings.  
15

16 17. For federal fiscal year 2016-17, which began October 1, 2016, IIB was approved by the  
17 federal and state government to resettle 380 refugees in the Western New York. This  
18 number was agreed to in consultation with our national resettlement partner, USCRI, and  
19 was approved by the U.S. Department of State Bureau of Population Resource Migration,  
20 as well as the NYS refugee coordinator, as it is every year. IIB budgeted for the revenue  
21 associated with this number of arrivals and hired resettlement case managers and other  
22 support staff to meet the U.S. Department of State’s recommended staffing ratio of 65-  
23 75 cases per manager.  
24  
25  
26

1 18. As of March 15, 2017, IIB will have resettled 190 individuals. Before the Executive  
2 Order was issued, IIB would have expected to resettle an additional 190 individuals  
3 between now and September 30, 2017. However, as a result of the Executive Order's  
4 reduction of the national refugee resettlement program from 110,000 to 50,000, IIB has  
5 been informed by USCRI that we will be resettling approximately 9 more individuals for  
6 the balance of the fiscal year. The 120-day suspension in all resettlement, and the  
7 difficulty of restarting the program after the pause, will likely reduce these numbers to  
8 zero.  
9

10  
11 19. The reduction in resettlement caseload has already begun to impact IIB and sister  
12 resettlement organizations in New York State. Many agencies have already laid off staff.  
13 The Reception and Placement (refugee resettlement) program is a per capita funded  
14 program; for federal fiscal Year 2016-2017, the per capita funding amount is \$2025 per  
15 refugee. Of this total, \$950 per capita funds are used for agency administrative costs,  
16 principally the salaries of case managers, support, and supervisory staff. These employees  
17 are the people who carry out the work we are contracted to do under the Reception and  
18 Placement program.  
19

20  
21 20. By both suspending the refugee admissions program for 120-days and cutting the total  
22 number of individuals slated for resettlement (through the new 50,000 cap), the Executive  
23 Order forces a significant reduction in IIB's revenue, which is leading to staff layoffs and  
24 also harming case management services to refugee individuals already living in New York  
25 and participating in the local economy and community.  
26

1  
2 21. As a direct result of the reduction in administrative funding, IIB will be laying off six  
3 employees over the next 90 days; all of these employees are critical to the resettlement  
4 program and are themselves local residents and community members. It will be difficult if  
5 not impossible to rehire these employees after the 120-days suspension period.  
6

7 22. The reduction in federal funding for the refugee resettlement program in our region, which  
8 constitutes over \$2.1 million dollars just this year for the four resettlement agencies in  
9 Buffalo, most certainly has a negative effect on the local economy. Rent for apartments will  
10 not be paid; food, clothing, transportation services will not be purchased. Local interpreters  
11 will not earn tens of thousands of dollars – last year, IIB spent \$70,000 on interpreters for  
12 resettlement clients. This year, the purchase of these services from vendors will amount to  
13 substantially less.  
14

15 23. In addition, and significantly, the economic contribution of refugees to the WNY economy  
16 - as employees, business owners, homeowners, professionals, students, and more – will not  
17 occur. Western New York has long struggled with population decline. A shrinking  
18 population is one of the most salient and consistent attributes of the WNY economy over  
19 the last 60 years. Declining population manifests as a negative in many ways: vacant houses  
20 and storefronts, lack of purchasing power, declining populations in schools, lack of  
21 employees for local companies, declining tax base for local government, and more. Across  
22 the U.S., and in Western New York, refugees are a main reason for a reversal of that decline.  
23  
24  
25  
26

1 24. For instance, the population of Erie County, New York – which is where Buffalo is located  
2 – grew slightly, by about 12,000, in 2014. This growth has been attributed to the in-  
3 migration of refugees and immigrants. Similarly, the Buffalo metropolitan area’s rate of  
4 population decline is slowing. According to a report released in February 2017, 32% of the  
5 foreign-born population in Buffalo in 2014 were refugees.<sup>2</sup> Projections are that the city will  
6 gain population in 2020, due in large part to refugees and immigrants.<sup>3</sup>  
7

8 25. Entire neighborhoods which used to be dominated by vacant homes and storefronts are  
9 vibrant, populated and diverse—and desirable places to live, thanks to refugees. Refugee-  
10 owned and immigrant-owned businesses have been part of the early forces revitalizing long  
11 empty commercial streets all over Buffalo. As of 2014, the 2,691 self-employed refugees  
12 and immigrants in Buffalo generated \$121 million in business income.<sup>4</sup> Census and  
13 economic data also indicate that foreign-born residents in Buffalo – refugee and immigrant  
14 – contributed \$3.1 billion to the metro area’s gross domestic product in 2014.<sup>5</sup>  
15  
16

17 I declare under penalty of perjury that the foregoing is true and correct.  
18

19 Executed on this 11<sup>th</sup> day of March, 2017

20 /s

21 \_\_\_\_\_  
Eva Hassett

22  
23 \_\_\_\_\_  
24 <sup>2</sup> *New Americans in Buffalo and Syracuse*, NEW ECON. PROJECT 3 (Feb. 22, 2017),  
25 [http://www.newamericaneconomy.org/wp-content/uploads/2017/02/BuffaloSyracuse\\_brief\\_Final.pdf](http://www.newamericaneconomy.org/wp-content/uploads/2017/02/BuffaloSyracuse_brief_Final.pdf). IIB and  
26 CenterState Corporation for Economic Opportunity, a leadership organization and chamber of commerce in New  
York State, obtained a competitive grant for the New American Economy to conduct research about the economic  
impact of refugee and immigrant population in the Buffalo and Syracuse metropolitan regions of New York State.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.* at 5.

<sup>5</sup> *Id.* at 2.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26