

DECLARATION OF
ABDUL SALAM
MUBAREZ

**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 Abdul Salam Mubarez, hereby declare as follows:

1. I am the chairman of ATM World Corp., which operates 4,500 Automated Teller Machines (“ATMs”), and processes approximately 2 million monthly transactions. I have owned the company for the past 18 years, and it is headquartered in Long Island City, New York.
2. I was born in Yemen and have lived in New York for approximately 40 years. I currently reside in East Elmhurst, New York.
3. I immigrated to the U.S. from Yemen in 1974, and became a U.S citizen in 1976.
4. In New York City, ATM World Corp. places ATMs in businesses throughout the city. We

1 proudly provide services to small businesses, including approximately 2,000 Yemeni-owned
2 businesses across the five boroughs of New York City, as well as to large businesses, such as
3 Ikea's Brooklyn location.

4 5. I am very proud that my company places ATMs in many underserved communities helping
5 to ensure fellow New Yorkers have access to their hard-earned money, regardless of their zip
6 code.
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8 6. In 2015 alone, ATM World Corp., paid roughly \$250,000 in taxes.

9 7. The Executive Orders passed on January 27, 2017 and March 6, 2017, both entitled
10 "Protecting the Nation from Foreign Terrorist Entry in the United States," have affected me on
11 a professional and personal level.

12 8. At ATM World Corp., I employ 30 New Yorkers, ten of whom are Yemeni-American.

13 9. Since the issuance of the Executive Orders, many of my employees are now uncomfortable
14 performing their jobs. Their jobs require travel throughout the five boroughs to provide needed
15 technical services to customers, and the anti-immigrant and anti-Muslim rhetoric surrounding
16 the Orders, has left many fearful that because of their background and religion – they will be
17 targeted and unwelcome.
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19 10. Even my business colleagues who are Yemeni-American citizens and lawful permanent
20 residents are fearful of traveling outside of the U.S. to meet their family members in Yemen.

21 11. My business colleagues are afraid of vocalizing their opinions on the Executive Orders, for
22 fear that any negative statement on the Orders will be used to further curtail their rights.
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24 12. On a personal level, my niece who is a U.S. citizen lives with me and has applied for
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1 her husband, who is a Yemeni-national, to meet her in New York. She is now gravely worried
2 that, because of the Executive Orders, she will not be reunited with her husband.

3 13. In my experience, the process for a Yemeni-national to come to the U.S. is already
4 extremely difficult. To my knowledge, most Yemeni-nationals are not travelling to the U.S. for
5 purposes of tourism. Rather they are undergoing a drawn-out process of extreme vetting. The
6 Executive Orders are preventing business owners, like myself, from expecting employees and
7 customers to stay in their jobs, and carry on their businesses.
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9 14. Despite the revisions in the Executive Order issued on March 6, 2017 – many of my
10 employees and clients are living in a climate of fear – fear that their families will not be re-
11 united, and fear that they will be targeted because of the rhetoric surrounding the Orders.

12 I declare under penalty of perjury that the foregoing is true and correct.
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14 Executed on this 11 day of March, 2017

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17 [Abdul Salam Mubarez]
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