

# DECLARATION OF JENNIFER SIME

**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, Jennifer Sime, hereby declare as follows:

1. I am Jennifer Sime, Senior Vice President, US Programs of the International Rescue Committee (IRC). I am responsible for providing executive oversight and management of IRC's refugee resettlement programs in the United States.
2. IRC is a non-profit, non-sectarian global organization founded in 1933 and currently operating in over 40 countries around the world. The IRC's core mission is to serve people forced to flee from war, conflict, and disaster and help them survive, recover, and gain control of their lives. A substantial part of the IRC's work is providing aid to

1 refugees, which it does recognizing that refugees are the victims of terror, not the  
2 perpetrators of it.

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4 3. Responding to the world's worst humanitarian crises, the IRC helps people whose lives  
5 and livelihoods are shattered by conflict and disaster to recover and gain control of their  
6 futures. Starting from the moment a new refugee arrives at the airport, the IRC provides  
7 essential services to maximize successful resettlement through its 28 U.S. offices. These  
8 offices serve as a free, one-stop center for refugees' needs during their pivotal first  
9 months in the United States, providing immediate aid, including food, housing, and  
10 medical attention.  
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13 4. The March 6, 2017 Executive Order suspending the US Refugee Admissions Program  
14 has interfered with IRC's ability to carry out its mission and injured those the IRC serves,  
15 characteristically extinguishing the glimmer of hope of refugees awaiting a safe life in  
16 the United States.  
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19 5. The IRC is one of only nine resettlement agencies approved by the U.S. Department of  
20 State. Over the past forty-years, the IRC has resettled roughly 370,000 global refugees  
21 in cities throughout the United States.  
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23 6. The IRC operates in 28 U.S. cities to oversee domestic refugee resettlement. The IRC in  
24 New York opened in 1975, and since then has resettled over 28,000 refugees by using a  
25 combination of services including case management, employment assistance, education  
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1 programming, and legal services. The IRC of New York is headquartered in New York  
2 City and is operated by a staff of 21 employees and 400 volunteers annually.  
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4 7. During fiscal year 2016 (October 1, 2015 to September 30, 2016), the IRC in New York  
5 resettled 125 individuals from fifteen different countries of origin. The office anticipated  
6 resettling approximately 125 individuals again in fiscal year 2017, and thus far the IRC  
7 in New York has resettled only 45 individuals from 10 different countries of origin.  
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10 8. The March 6, 2017 “Protecting The Nation From Foreign Terrorist Entry To The United  
11 States” Executive Order directly harms refugees awaiting resettlement to the U.S. and those  
12 already residing here.  
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14 9. Families separated because they obtained refugee status at different times, who have been  
15 waiting to be reunited, will have to wait even longer. One case overseen by IRC of New  
16 York involves a 17-year old waiting to be reunited with his father, stepmother, and  
17 siblings, all of whom reside in New York City. However, because of the Executive Order,  
18 his family does not know when he will be permitted to join them.  
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21 10. Currently, the IRC in New York has 25 cases (56 people) in its pipeline waiting for  
22 resettlement in New York City, from countries such as Iraq, Afghanistan, Syria, El  
23 Salvador and Cuba. However, as a result of the EO’s limits on and suspension of the US  
24 Refugee Admissions Program, it is possible that none of these people will now be resettled.  
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1 11. In this way, the Executive Order also directly impacts refugees already living in the U.S.  
2 Resettlement agencies including the IRC in New York are allocated funding on a per  
3 arrival basis through a contract with the U.S. State Department, but that does not account  
4 for ongoing services to individuals already in the country.  
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6 12. The Order not only suspends refugee resettlement for 120 days, but reduces the number of  
7 refugee arrivals this fiscal year from 110,000 to 50,000. As a result, the IRC in New York  
8 is facing a reduction in resources. This puts in jeopardy the capacity for resettlement  
9 agencies to provide continued services for those refugees who are already here and in  
10 need of case management, employment and other support services, such as developing  
11 and refining job skills, connecting clients to professional work, offering English-  
12 language instruction or other training opportunities, providing access to legal services,  
13 and connecting clients to other community-based organizations.  
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16 13. As of the issuance of the Executive Order, the United States had already vetted 60,000  
17 individuals for resettlement in the country. These refugees are now stranded in crisis  
18 zones, even though they have established to the satisfaction of Consular Officers that  
19 their lives are in danger and they pose no threat to the United States. In many cases, these  
20 are individuals who have been separated from family members already in the United  
21 States.  
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23 14. Refugees are vetted more intensively than any other group seeking to enter the U.S. In  
24 fact, the hardest way to come to the country is as a refugee. Once those refugees most in  
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1 need are registered by the UNHCR, the U.N. refugee agency, the U.S. then hand-selects  
2 every person who is admitted.  
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5 15. The U.S. resettlement program gives priority to refugees, usually vulnerable families,  
6 who have been targeted by violence. The U.S. does not recognize as refugees people who  
7 have committed violations of humanitarian and human rights law, including the crime of  
8 terrorism, as refugees. They are specifically excluded from the protection accorded to  
9 refugees.  
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12 16. Security screenings are intense and led by U.S. government authorities, including the  
13 FBI, the Department of Homeland Security, the Department of Defense, and multiple  
14 security agencies. The process typically takes up to 36 months and is followed by further  
15 security checks after refugees arrive in the States.  
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18 17. Refugees undergo biographic and biometric checks, medical screenings, forensic  
19 document testing, and in-person interviews. Because of the complexity of the conflict in  
20 their country, Syrian refugees must go through extra review steps with intelligence  
21 agencies and Department of Homeland Security officers who have particular expertise  
22 and training in conditions in Syria and the Middle East.  
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I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 10th day of March, 2017



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Jennifer Sime