

DECLARATION OF ROSS LEWIN

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON, *et al.*,

*

Plaintiffs,

v.

*

Civil No. 2:17-cv-00141

DONALD TRUMP, *et al.*,

*

Defendants.

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DECLARATION OF ROSS D. LEWIN

Pursuant to 28 U.S.C. § 1746, I, Ross D. Lewin, declare as follows:

1. I am over eighteen years of age, am competent to testify, and have personal knowledge of the matters in this declaration.

2. I serve as Associate Vice President for International Affairs at the University of Maryland College Park (“the University”). I have held this position since 2012. Before joining the University, I was Executive Director of the Office of Global Programs and Director of the Office of Study Abroad at the University of Connecticut. As Associate Vice President for International Affairs, I am responsible for the direction and management of the Office of International Affairs, which includes International Student Scholar Services, Education Abroad, and the Office of China Affairs. The Office of International Affairs coordinates international activities within the University’s seven colleges and five schools, advancing a strategic plan for internationalization, fostering

and nurturing international partnerships, and developing innovative programming for faculty and students to facilitate their development as global leaders committed to the improvement of the common good.

3. The University currently enrolls more than 6,100 international students and employs 1,500 international faculty from 137 countries. It sends more than 2,000 students abroad to more than sixty countries each year. It currently has 273 active international agreements with more than 213 partners in 53 countries.

4. I have reviewed the March 6, 2017 Executive Order: Protecting the Nation from Foreign Terrorist Entry into the United States (“Executive Order”), which temporarily bars entry into the United States by persons who are citizens of six countries: Syria, Iran, Somalia, Sudan, Libya, and Yemen (the “designated countries”). The implementation of the Executive Order on March 16, 2017 will directly impair the University’s ability to carry out its mission of teaching, research and support for the State’s economic development. Implementation of the Executive Order will prevent some students and faculty from traveling for academic activities and will impede some students’ academic progress and the progress of scholarly research. It will prevent some students from seeing family members, and it has already caused anxiety, depression and

alienation among all international members of the campus community. It will lead to enrollment declines, causing economic harm to the University.

5. The Executive Order will likely delay the return of one student who has applied for renewal of his expired student visa, a process which typically requires a 90-day waiting period. If this student's visa is not issued prior to the effective date of the Executive Order, the 90-day ban will increase his wait time to return to the United States to 180 days, thus impeding his academic progress and the University research in which he is engaged. The 90-day travel ban will likely prevent some students' family members from coming to the United States to visit for upcoming important milestone events, such as the May 2017 graduation and awards ceremonies.

6. Students from the designated countries whose visas have expired or will soon expire will not be eligible to apply for new visas until the 90-day ban has elapsed, thus delaying any travel abroad for academic or personal reasons.

7. Even students with valid visas have expressed hesitancy to travel abroad. They fear they will be subjected to heightened scrutiny upon their return to the United States, or that there may be additional executive orders forthcoming that will affect their immigration status. As a result, some students have opted not to study abroad, an activity the University regards as an important component of an undergraduate education.

Moreover, fewer graduate students will present their research at academic conferences abroad and carry out field work at global experimental stations, thereby making those students less competitive in the global job market.

8. The Executive Order is disrupting critical University research. For example, honeybee colonies have declined precipitously in the last several years, threatening crops that many humans depend on for their primary source of nutrition. The University is exploring the possible causes and potential remedies for this condition, known as colony collapse disorder, by surveying and mapping global honeybee populations. The U.S. Department of Agriculture has recognized the University's critical role in this work by funding its research since 2009. This work requires a team of experts, each of whom has unique knowledge and skills. None is easy to replace. After a long search, the University identified a statistician with singular expertise. Excited to join in this important work, she accepted the offer and was ready to relocate from Europe to College Park to begin her appointment. Because she was uncomfortable about the focus of the January 27, 2017 executive order upon predominantly Muslim countries, she decided to reverse her decision, leaving the University with a knowledge gap that will slow the progress of this urgent research. The University operates numerous scientific laboratories, each of which is a complex organization with myriad interdependent parts.

More than 200 graduate students, post-docs, and faculty from the designated countries staff the University's laboratories. The loss of just one of these researchers will disrupt work and delay progress for an entire lab.

9. The Executive Order has generated deep anxiety among the University's international population, particularly among Muslim students. They have expressed intense feelings of insecurity, depression, and alienation. The University has mobilized a team of professionals to provide special counseling services and has engaged legal counsel specializing in immigration to advise students. Staff in the University's Office of International Affairs have worked many hours beyond their regular work schedules to assist students affected by the January 27, 2017 executive order and this Executive Order, diverting their attention from other critical matters.

10. The Executive Order threatens the University's enrollment. Close to 400 individuals from the designated countries have submitted applications for Fall 2017 admission. More than 90% are from Iran. If just half of these students are admitted and accepted but choose not to attend the University because of the Executive Order's chilling effect, the University will incur a revenue loss of approximately \$1.6 million for Academic Year 2017-18. Moreover, the State of Maryland will lose these students' long-


term economic contribution, particularly because the overwhelming majority are in high-demand STEM disciplines.

11. The Executive Order affects the University's ability to attract talented international students, which has and will continue to financially impact the University and the State of Maryland. According to the 2016 NAFSA Association of International Educators report, international students contribute \$150 million annually to the University in payments for tuition, housing, and academic materials, generating and/or maintaining more than 2,200 jobs in 2016 alone. <https://istart.iu.edu/nafsa/reports/state.cfm?state=MD&year=2015>. The uncertainty surrounding the United States' immigration policy and the perception that the United States does not welcome students from predominantly Muslim countries will deter students from choosing to study at the University. The loss of just one of these students reduces the University's revenues.

12. The loss of students from the designated countries will also diminish the educational experiences of all of the University's students, because their access to the views and perspectives of students from these countries will be limited. Particularly affected will be those students who are preparing for positions requiring global involvement and leadership.

13. The University fears that the Executive Order will damage its international reputation. The University ranks high in all of the most respected and well disseminated global university rankings, including the US News and World Report Best Global University Ranking (40/1,000), the Academic Research World University Ranking (52/1,200), and the Times Higher Education World University Ranking (67/980). These rankings are based in part on the number of international students and faculty at the University, and the University's level of engagement with international partners through research collaboration. A reduction in these activities will likely affect the University's standing in these important rankings.

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



ROSS D. LEWIN