

DECLARATION OF
MICHAEL
SAUNDERS

The Honorable James Robart

**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
TILLERSON, in his official capacity
as Secretary of State; and the UNITED
STATES OF AMERICA,

DECLARATION OF MICHAEL
SAUNDERS

Defendants.

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

1. I am over the age of eighteen and competent to testify.
2. I am Corporate Counsel for Redfin Corporation (“Redfin”). I work at Redfin’s Seattle headquarters. I have personal knowledge of the matters stated herein, and if called as a witness, I could and would testify competently thereto.

1 3. Redfin is a Seattle-based technology-powered residential real estate brokerage
2 representing homebuyers and sellers in over 80 markets throughout the United States.

3 4. Redfin has helped customers buy or sell more than 75,000 homes worth more
4 than \$40 billion since its inception.

5
6 **The Executive Orders Run Contrary to Redfin's Values**

7 5. Redfin's mission is to serve others in their search for a new home, including
8 those who have traveled the farthest to do so. This is consistent with Redfin's culture of
9 respecting one another's differences, including differences in national origin and religion. As
10 Redfin's CEO, Glenn Kelman, stated in response to President Trump's January 27, 2017
11 Executive Order on foreign travel: "No one will make you feel unwelcome here [at Redfin]."

12 6. Because of these values, Redfin has chosen to join with others in the real estate
13 and technology industries in opposing President Trump's January 27, 2017 and March 6,
14 2017 Executive Orders on foreign travel (collectively "the Executive Orders").

15
16 **The Executive Orders are Harmful to Redfin's Business**

17 7. Not only do the Executive Orders run contrary to Redfin's mission and culture,
18 they are also harmful to Redfin's business. We are aware of at least five potential Redfin
19 customers who have decided not to purchase a house due to concerns about U.S. immigration
20 policy arising from President Trump's Executive Orders on foreign travel. Redfin loses
21 potential revenue each time a customer ends his or her homebuying search before buying a
22 home.
23

24 8. In January 2017 a Redfin agent in Orange County, California was assisting a
25 United Arab Emirates ("UAE") citizen, and former contract worker for the U.S. government
26

1 in Afghanistan, in making a cash offer to buy a home listed for \$1,000,000. After the offer was
2 accepted and the buyer was arranging to close the sale, he learned he would need to appear in
3 the UAE to initiate the money transfer. He cancelled his home purchase, worried he could not
4 return to the United States if he left to complete the money transfer.

5
6 9. Another Redfin agent in Los Angeles was working with a customer interested in
7 purchasing a home listed for \$775,000. On January 30, 2017 this customer cancelled her home
8 search by sending the following email:

9 We are deeply shaken with the way Trump is alienating immigrants in this
10 country. ... Me and my husband are from Turkey which is also a muslim majority
11 country. We are currently on L-1 visa and in the process of getting our green card.
12 And we just received news claiming that Trump's policy will also cover L-1 visa
13 owners as well. In that case, we are not even sure how this is going to impact our
14 green card application process.... We love the home and we want to make the
15 offer, but under the light of current events, we can't decide the next steps before
16 making sure that Trump's policy won't impact us.

17
18 10. In January 2017 a Redfin real estate agent was helping a husband and wife find
19 a home near Boston. These Redfin customers immigrated to the United States from India and
20 have lived in the United States for more than four years. With Redfin's help they made an
21 offer, which was accepted, to purchase a \$570,000 home. These homebuyers withdrew their
22 offer after President Trump's January 27 Executive Order. They were concerned about the
23 federal government's immigration policies.

24
25 11. A Redfin agent in Seattle had been assisting a homebuyer customer from
26 Bangladesh since November 2016 with his search to find a condominium in the \$300,000 to
\$400,000 range. On February 1, 2017, this customer told the agent he was canceling his
search due to concerns he might be deported under a possible expansion of President
Trump's Executive Order.

1 12. A Chicago-based Redfin real estate agent began assisting Indian-immigrant
2 homebuyer customers in November 2016. These customers hoped to buy a home in the
3 \$400,000 to 500,000 range. They began looking at homes in November 2016 but stopped
4 after President Trump's January 27 Executive Order was issued. I understand these
5 customers were concerned about their ability to remain living and working in the United
6 States.
7

8 13. In addition to the potential lost revenue described above, I understand Redfin
9 has and will continue to incur increased business costs as a result of its efforts to assist and
10 advise homebuying customers being impacted by the Executive Orders on foreign travel.
11

12 14. While Redfin would be happy to suffer lost commission revenue and increased
13 business costs in the name of national security, it does not believe President Trump's
14 Executive Orders on foreign travel advance our national security interests, and that the
15 Executive Orders in fact harm all businesses predicated on an open society.
16

17 15. The overall financial impact on Redfin's business resulting from the Executive
18 Orders, whether from lost commissions or increased business costs, is not yet known.
19

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

21 Executed on this 11th day of March, 2017

22 

23 _____
24 Michael Saunders
25 Corporate Counsel
26 REDFIN CORPORATION