

# DECLARATION OF DAVID SOIKE

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

STATE OF WASHINGTON, and  
STATE OF MINNESOTA,

Plaintiffs,

v.

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 Secretary of State; and the UNITED  
STATES OF AMERICA,

Defendants.

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

DECLARATION OF DAVE SOIKE

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

1. I am over the age of eighteen and competent to testify herein.
2. I am Interim Chief Executive Officer with the Port of Seattle.
3. The Port of Seattle is a government entity that represents the people of King County by advancing trade and commerce. We operate Seattle-Tacoma International Airport, serve as the landlord for our seaport and cruise ship terminals and host the North Pacific fishing fleet,

1 among other economic responsibilities. We receive lease fees from our tenants, as one part of  
2 a diversified revenue stream.

3 4. The Port of Seattle's Century Agenda is a blueprint for creating 100,000 new jobs in the Puget  
4 Sound region in the next 25 years. The Century Agenda contains, as two of its four Strategic  
5 Objectives, the goals to 1) position the Puget Sound region as a premier international logistics  
6 hub by growing seaport annual container volumes and tripling air cargo volumes, and 2)  
7 advancing this region as a leading tourism destination and business gateway through making  
8 Seattle-Tacoma International Airport (Sea-Tac) the West Coast "Gateway of Choice" for  
9 international travel and doubling the number of international flights and destinations.

10 5. The growth of the Port over the last several years has been driven mainly by our expanding  
11 international economic activity. The Northwest Seaport Alliance, which manages the  
12 container business of the Port of Seattle and the Port of Tacoma, moved more than 3.6 million  
13 Twenty-foot Equivalent Units ("TEUs") of containerized maritime cargo. Last year's 3.6  
14 million TEUs of containerized maritime cargo total is the highest number since 2007 and an  
15 increase of more than 2 percent from 2015 volumes, despite a decrease in domestic volumes  
16 of 1.5 percent for the year.

17 6. Sea-Tac International Airport served 45.7 million passengers in 2016, an 8 percent increase  
18 from 2015 – driven largely by an 11.1 percent increase in international passenger traffic over  
19 2015 numbers. In addition, over 114,000 metric tons of cargo were imported into Washington  
20 or exported out of Washington via Sea-Tac International Airport via airplane.

21 7. Overall, the total value of goods that were shipped through the Port of Seattle's container  
22 terminals was \$21.7 billion, and our airport supported the movement of almost \$27 billion in  
23 trade.

24 8. In terms of passengers, Sea-Tac International Airport served close to 4.9 million travelers via  
25 our international flights in 2016.

26

- 1 9. We estimate that each direct international route servicing Sea-Tac International Airport  
2 generates \$89.3 million annually to the State of Washington. This figure assumes that an  
3 airline flies, on average, four times per week for each direct international route. Currently, 24  
4 international destinations are accessible by direct flight from Sea-Tac International Airport,  
5 including Dubai in the United Arab Emirates via Emirates Airlines.
- 6 10. A portion of our international business activity is with the six countries identified in President  
7 Trump's newly released "Executive Order Protecting The Nation From Foreign Terrorist  
8 Entry Into The United States." Specifically, two-way international trade (trade that includes  
9 products imported from another country into Washington and products exported out of  
10 Washington to other countries) through our seaport and air freight businesses totaled \$5.3  
11 million in 2016. For a breakdown of those trade totals, see Exhibit A.
- 12 11. The United States Department of Transportation's (USDOT) origin and destination data  
13 shows that, in 2016, more than 6,000 passengers travelled to or from the six countries  
14 identified in the Executive Order. The Port relies on this data in the ordinary course of  
15 business in order to understand the flow of travelers who use our airport. The USDOT's  
16 statistic captures the complete itineraries of U.S. airline passengers but only the itineraries of  
17 foreign flag carrier passengers if they connect to a domestic flight; therefore, the actual  
18 number of passengers travelling to and from those six countries is expected to be higher, since  
19 it would include individuals whose final destination on a foreign flag carrier didn't include a  
20 domestic flight after they landed at Sea-Tac International Airport.
- 21 12. The seaport and airport goods trade data referenced in Exhibit A is collected by WISERTrade,  
22 a proprietary database that uses available U.S. Customs data to track trade flows through U.S.  
23 ports. The Port subscribes to this database for up-to-date, accurate information on the goods  
24 traveling through our gateway, as well as their origin and destination. The estimation of  
25 economic impact of international flights is based on a study by Martin Associates,  
26 commissioned by the Port of Seattle as part of a regular measurement of the Port's overall

1 economic impact. The Port relies on these sources of information in the ordinary course of  
2 business and operations.

3 13. As a public entity, the revenue generated by the Port is for the benefit of the residents of King  
4 County. According to the 2014 Martin Associates study, the Port's activities result in 129,744  
5 direct jobs and \$4.2 billion of direct wages and salaries. Businesses providing services at the  
6 Port-owned marine terminals and Sea-Tac International Airport, as well as real estate tenants,  
7 received \$19.8 billion of revenue, and \$894.4 million of state and local taxes were generated.

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

10 Executed on this 10th day of March, 2017

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13 DAVE SOIKE  
14 Port of Seattle Interim Chief Executive Officer  
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**Exhibit A. Goods Exported and Imported Via  
Port of Seattle Airport and Seaport Facilities**

Description	Products Exported to Iran Through Sea-Tac Airport	Products Imported from Iran Through Sea-Tac Airport	Products Exported to Libya Through Sea-Tac Airport	Products Exported to Somalia Through Sea-Tac Airport	Products Imported from Somalia Through Sea-Tac Airport	Products Exported to Somalia Through Port of Seattle Container Terminals	Products Exported to Iran Through Port of Seattle Container Terminals	Products Imported from Iran Through Port of Seattle Container Terminals	Products Exported to Libya Through Port of Seattle Container Terminals	Products Exported to Yemen Through Port of Seattle Container Terminals
Aircraft, Spacecraft, And Parts Thereof			\$ 7,760.00	\$ 3,000.00						
Carpets And Other Textile Floor Coverings		\$231,923.00				\$ 25,323.00		\$397,615.00		
Cereals	\$ 8,477.00									
Coffee, Tea, Mate & Spices		\$ 9,985.00								
Fish, Crustaceans & Aquatic Invertebrates	\$ 161,512.00									
Footwear, Gaiters Etc. And Parts Thereof						\$195,000.00				
Furniture; Bedding Etc; Lamps Nesoi Etc; Prefab Bd						\$181,492.00			\$10,000.00	
Impregnated Etc Text Fabrics; Tex Art For Industry						\$ 10,000.00				
Industrial Machinery, Including Computers	\$ 3,000.00		\$324,530.00			\$ 80,000.00				
Leather Art; Saddlery Etc; Handbags Etc; Gut Art		\$ 591.00				\$ 25,600.00				
Oil Seeds Etc; Misc Grain, Seed, Fruit, Plant Etc							\$64,420.00			
Optic, Photo Etc, Medic Or Surgical Instrments Etc	\$ 1,107,282.00		\$ 5,653.00		\$11,793.00					
Pharmaceutical Products	\$ 1,453,707.00									
Plastics and Articles Thereof						\$ 9,700.00			\$20,000.00	
Products Of Animal Origin, Nesoi	\$ 227,900.00									
Soap Etc; Waxes, Polish Etc; Candles; Dental Preps						\$ 6,384.00				
Special Classification Provisions, Nesoi						\$ 48,000.00				
Textile Art Nesoi; Needlecraft Sets; Worn Text Art						\$ 42,440.00				
Vehicles, Except Railway Or Tramway, And Parts Etc						\$ 3,800.00				\$615,948.00
Wadding, Felt Etc; Sp Yarn; Twine, Ropes Etc.	\$ 35,178.00									
<b>TOTAL ALL COMMODITIES</b>	<b>\$ 2,997,056.00</b>	<b>\$242,499.00</b>	<b>\$337,943.00</b>	<b>\$ 3,000.00</b>	<b>\$11,793.00</b>	<b>\$627,739.00</b>	<b>\$64,420.00</b>	<b>\$397,615.00</b>	<b>\$30,000.00</b>	<b>\$615,948.00</b>