

DECLARATION OF SAJJAD TOPIWALA

The Honorable James Robart

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

Defendants.

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

DECLARATION OF SAJJAD
TOPIWALA

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

1. I am over the age of 18 and competent to be a witness. I am a resident of the State of Washington.
2. I am the Treasurer of Noor360, Inc.
3. Noor360 is a travel company that arranges pilgrimages to Iraq. For the Shiite people of Islam, the pilgrimage is meant to pay our respect to the grandson of the prophet of

1 Mohamad. On the trip, Noor360 arranges visits to approximately seven to eight shrines
2 located in Najaf, Karbala, and other cities in Iraq.

3 4. In 2015 and 2016, Noor360 arranged trips for approximately fifty people each year taking
4 pilgrimages to Iraq. At the time the Executive Order issued on January 27, 2017, Noor360
5 was accepting registration for the 2017 trip, which was planned to depart on March 31,
6 2017.

7 5. At the time the Executive Order issued, the company had more than twenty people signed
8 up for the trip leaving on March 31, 2017. As far as I know, the people who had signed up
9 were U.S. citizens and legal permanent residents from Pakistan and India.

10 6. When the Executive Order issued, however, many people were afraid to leave the United
11 States and cancelled their registration. So many people cancelled their registration that our
12 company had to cancel the trip altogether.

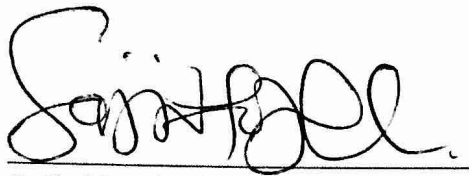
13 7. At the time the Executive Order issued, the company had purchased four non-refundable
14 tickets for its management. I was planning to take the March 31, 2017, trip as a manager.
15 Many of the people signed up for the trip had also purchased their ticket. Each ticket cost
16 approximately \$1,200.

17 8. As I stated above, Noor360 is a company that arranges pilgrimages to Iraq. The
18 President's Executive Order prevented at least 20 Muslims from traveling to conduct their
19 religious pilgrimage and has prevented them and me of Noor360 from practicing our faith.

20 9. In addition, by forcing Noor360 to cancel our pilgrimage to Iraq, the Executive Order has
21 also had a significant negative financial impact on Noor360, as Noor360 had already paid
22 for the trips of its managers and lost money it anticipated from the March 2017
23 pilgrimage.

24 I declare under penalty of perjury that the foregoing is true and correct.
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Executed on this 9 day of February, 2017



Sajjad Topiwala
Treasurer
NOOR 360, Inc.

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