

# DECLARATION OF RITA ZAWAIDEH

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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; REX  
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 RITA ZAWAIDEH

Pursuant to 28 U.S.C. § 1746(2), I, RITA ZAWAIDEH, 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. I am the founder and owner of Caravan-Serai, Inc. Caravan-Serai is a tour company located in Seattle that organizes tours to the Middle East and North Africa exclusively. I have been in business for 30 years. Since 2003, Caravan-Serai has been rated by Conde Nast Traveler magazine as a Top Travel Specialist.

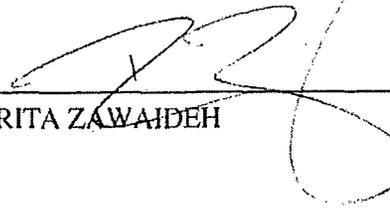
- 1 2. I am also the founder of Salaam Cultural Museum (SCM). SCM is a 501(c)(3) nonprofit  
2 organization that focuses on the specific task of bringing relief and aid to people affected  
3 by conflict and natural disaster within the Middle East and North Africa (MENA) region,  
4 and to bring people and cultures together to build bridges of understanding. SCM organizes  
5 medical and humanitarian missions to Greece and Jordan to assist Syrian refugees fleeing  
6 from the civil war in their country. I founded SCM in 1990.
- 7 3. Since President Trump issued his first Executive Order on January 27, 2017, Caravan-  
8 Serai's business has completely evaporated. I had 4 tours of Iran that I had to cancel. Each  
9 of these tours had about 12 clients. I have also had to cancel around 20 Foreign Independent  
10 Travel tours for 1 or 2 individuals each. My customers have told me that they are simply  
11 afraid to travel because they are concerned about whether they will be able to reenter the  
12 United States when they return from their trip. Even U.S. citizens have told me that they are  
13 afraid to go.
- 14 4. I have also had to cancel all planned SCM medical humanitarian missions. These are  
15 missions that I organize to send physicians and other health care professionals to Greece  
16 and Jordan to provide medical care to Syrian refugees. The physicians and other  
17 professionals who would go, many of whom are natives of the Middle East and North Africa  
18 but are U.S. citizens, have also told me that they are afraid to go on the mission for fear of  
19 not being able to reenter the U.S. or being subjected to severe harassment and scrutiny by  
20 U.S. Customs and Border Protection upon their return.
- 21 5. I normally would organize a medical humanitarian mission every 45 days, and they would  
22 consist of 15 to 20 physicians and other health care professionals. Currently, I cannot  
23 organize any because of the participants' fears as noted above.
- 24 6. The President's Executive Order of January 27, 2017, as well as the second one scheduled  
25 to become effective of March 16, has caused my business to lose almost all of its revenue.  
26 So far, I have not laid off any of my employees, because I value and appreciate their efforts

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and loyalty. However, I cannot continue to employ them indefinitely if I have absolutely no income from which to pay them.

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

Executed on this 9 day of March, 2017, at Seattle, Washington.

  
RITA ZAWAIDEH