

DECLARATION OF DAVID DUEA

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 DAVID DUEA

Pursuant to 28 U.S.C. § 1746(2), I, DAVID DUEA, 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 President and Chief Executive Officer of Lutheran Community Services Northwest (“LCSNW”).
2. LCSNW is a social service agency that formed in 2001 from the merger of several Lutheran outreach ministries. LCSNW is a ministry of the Evangelical Lutheran Church

1 of America and the Lutheran Church – Missouri Synod. Our mission is to partner with
2 individuals, families and communities for health, justice and hope. LCSNW’s
3 commitment is to reach out, sharing God’s love, in service to our neighbors.

4 3. LCSNW have ministered to over 40,000 refugees since 1975 by helping them resettle in
5 the United States.

6 4. We accomplish this, in part, through helping refugees learn basic living skills and
7 providing mental health services to those who have experienced traumatic events that led
8 them to flee their country of origin. We welcome and provide services to refugees of all
9 faiths as part of our ministry, as we see all refugees as God’s children.

10 5. One of the refugee programs at LCSNW is Multicultural Community Services (“MCS”).
11 MCS is contracted with the U.S. Department of State to help refugees rebuild their homes
12 and their lives by providing reception and placement services. These services include
13 securing housing, furnishings and food in preparation for the refugees’ arrival. After
14 arrival, MCS case managers refer refugees to social services, including medical screening,
15 employment programs, job coaching, English Language Learner classes, registering
16 children in school and temporary cash assistance.

17 6. Since August 1, 2016, LCSNW has provided resettlement assistance to 15 newly-arriving
18 refugees from Syria. During that time, we have provided assistance to 169 newly-arriving
19 refugees from Iran, Iraq, Somalia, Sudan, Libya and Yemen.

20 7. We estimate that as a result of the President’s second Executive Order that becomes
21 effective on March 16, we will be unable to provide assistance to between 100 and 200
22 refugees who would otherwise have come to the U.S. and for whom LCSNW would
23 provide services.

24 8. As I stated above, LCSNW is a ministry of the Lutheran Church. As Christians, our work
25 with refugees is a religious calling and is one way in which we serve our faith. We take to
26 heart the parable of the Good Samaritan, and see our efforts to help refugees as a way of

1 exercising our religious beliefs. The President's second Executive Order, by preventing
2 refugees for whom we would have otherwise provided services from traveling to the
3 United States, will prevent me and other employees of LCSNW from practicing our faith
4 by ministering to these refugees.

- 5 9. The President's second Executive Order, by preventing the arrival of refugees to whom
6 we would have otherwise provided services, will have a significant negative financial
7 impact on LCSNW, as LCSNW is paid for providing services to refugees. This is lost
8 revenue to LCSNW, as there is not a "pool" of refugees that we can assist to make up for
9 the lost revenue from those refugees who have been prevented from travelling to the
10 United States as a result of the Executive Order. We have notified 15 out of our 35 refugee
11 assistance staff that they will be laid off after the second executive order goes into effect.

12
13 I declare under penalty of perjury that the foregoing is true and correct.

14
15 Executed on this 10th day of March, 2017 at Seattle, Washington.

16 

17 DAVID DUEA
18 President and CEO
19 Lutheran Community Services Northwest

20 _____
21
22
23
24
25
26