

DECLARATION OF NAVID FALLAH

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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 Navid Fallah

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

1. I am over the age of eighteen and competent to testify herein.
2. I am a Washington State resident and a United States citizen.
3. I became a United States citizen through naturalization on July 28, 2010.
4. I have lived in Seattle, WA since April, 15, 2014.
5. My wife received her green card through marriage on October, 14, 2014.
6. My wife and I were born in Iran.
7. My wife has a masters degree in statistics and has been teaching math at Goodwill as a volunteer.

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- 8. I received my masters degree from University of Maryland and PhD in Computer Science from University of Nevada.
- 9. My wife and I have been helping our community by donating to American Red Cross and homeless community in Seattle.
- 10. My wife and I were scheduled to visit Iran on February 1, 2017, but we had to cancel our trip because of the President's first Executive Order. We lost about \$2000 in cancellation fees for our tickets. My sister has a newborn that I was hoping to see for the first time during the trip. My wife's father lives in Iran. He is old and we were hoping to spend as much time as possible with him before we lose him. I am constantly worried that if my father in law passes away, my wife will never recover from being so sad to miss her last chance to be with her father.
- 11. My wife and I are planning to have a baby. My wife's mum lives in Iran. The President's Executive Orders prevent her from getting a visa. So long as travel is banned for Iranians, she will not be able to be with her daughter and support her during her pregnancy and after the baby is born.
- 12. Since the new executive orders have been signed, Iranians have been target of assaults around the country. My wife and I do not feel safe to go to many places that we might be targeted, such as shopping malls. We are scared of talking to people and revealing where we are originally from.
- 13. For the first time, after living in the United States for more than 12 years, I feel I am not welcome in this country, because of the country I was born in. I feel uncertain about my family's future and that new policies can change our lives drastically at any moment.
- 14. We are afraid to travel to Iran and visit our families, as new polices have been put into effect without any notice or clear instructions, which prevented many legal immigrants to travel back to the United States.
- 15. We left Iran because I did not agree with the way the government ran the country. We were hoping to call the United States our home, have kids, and make a positive impact. We are worried that we will have to give up our dreams and be forced to move out of the United States.

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

Executed on this 10th day of March, 2017



Navid Fallah