

Supplemental  
Brief  
Exhibit C

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

STATE OF WASHINGTON

Plaintiff,

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.

DECLARATION OF JOHN BOESENBERG

I, John Boesenberg, hereby declare and affirm:

1. I am the Deputy Executive Director for Business Operations for the Washington State Board for Community and Technical Colleges ("SBCTC"). The SBCTC advocates, coordinates and oversees Washington state's system of 34 public community and technical colleges. I have personal knowledge of the facts set forth in this declaration, and I am competent to testify about them.

DECLARATION OF  
JOHN BOESENBERG

1           2.       I was appointed a Deputy Director of the SBCTC in July 2011. I have worked at  
2 the SBCTC for 19 years. I have a bachelor's degree from Western Washington University.

3           3.       As Deputy Director, I am the chief financial officer for the college system and  
4 oversee operating and capital budget, accounting and auditing, and human resources.

5           4.       Washington state's community and technical colleges serve approximately  
6 381,000 students, with at least 188 matriculated students who are citizens of the seven listed  
7 countries in the Executive Order. These students are here under valid student visas and study  
8 side by side with students from the U.S. and from other countries around the globe.

9           5.       I have reviewed the Executive Order entitled "Protecting the Nation from Foreign  
10 Terrorist Entry Into the United States," and I am aware that the Order purports to temporarily bar  
11 entry into this country any person who is a citizen of any one of seven countries – Syria, Iraq,  
12 Iran, Somalia, Sudan, Libya and Yemen – regardless of whether there is any evidence that the  
13 individual in question had any connection with any terrorist organization or activity.

14           6.       One of our colleges has five employees with Green Cards that are from the named  
15 countries in the Executive Order.

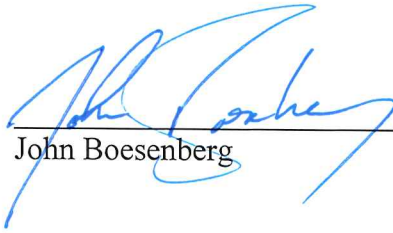
16           7.       As with the University of Washington and Washington State University, we value  
17 the unique perspectives that students and employees from other countries bring to our campuses.  
18 *See* Decl. of J. Riedinger ¶ 5, ECF No. 9; Decl. of A. Chaudhry ¶ 5, ECF. No. 5.

19           8.       Washington State's 34 community and technical colleges have over 10,000  
20 international students from all over the world. They enrich the learning environment through  
21 sharing their personal stories and their culture. We anticipate the Executive Order to have a  
22 chilling effect on the college's international program and the number of student to decrease.

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24           I declare under penalty of perjury under the laws of the State of Washington that the  
25 foregoing is true and complete to the best of my knowledge.  
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Dated this 1 day of February, 2017.

  
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John Boesenberg

