

DECLARATION OF
AHMAD
MOGHADDAM

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

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD TRUMP, et al.,

Defendants.

CIVIL ACTION NO. 2:17-cv-00141-JLR
**DECLARATION OF AHMAD
MOGHADDAM**

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

1. I am over the age of eighteen and competent to testify herein.
2. I live in Washington State.
3. The new travel ban (3.0) impacts me and my wife in extremely traumatic ways.
4. I am a Canadian/Iranian citizen and have worked as a Digital Design manager legally in the US under a TN1 visa since 2014. I have 18+ years of experience in industry.
5. In 2017, my company, a start up located at Bellevue, WA, decided to apply for a H1B for me. I received notice that my H1B visa application was approved on Sept 26, 2017. However, I will not be able to change my status by October 18, 2017 because I live

1 with my wife who is as Iranian citizen. As soon as I change my status from TN1 to
2 H1B, my wife will need to apply for an H4 visa which requires her to go to a US
3 embassy abroad to be able to legally stay with me in the US. The newest travel ban will
4 mean that her application will not be processed indefinitely.
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6 6. My mother is 65+ years old and my father is 75+ years old. They are Iranian citizens.
7 We are a very dependent and close family that visits each other on a regular basis. They
8 applied for tourist Visa last year, in 2016. Due to the administrative processing, their
9 Visa has not been issued. Last week, US embassy informed us that (after an inquiry),
10 the visa is ready only for my mother but not for my father due to the extra vetting it
11 requires. My mother will have to travel alone by herself if she receives her visa in time
12 before the new ban kicks in. I do not know if my father will ever be able to come.
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14 7. My father in law passed away recently in Iran. My wife was in Iran to be with her
15 family during this difficult time of grieving and mourning for her great loss. Her plan
16 was to stay longer after official ceremonies. However, when the newest travel ban was
17 announced, she had to give her family a very short notice that she has to come back to
18 the US right away. This has caused many traumas for me, her family and herself in this
19 occasion.
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21 8. I am a Canadian citizen and last year I applied for my wife's permanent residence of
22 Canada. On September 29, 2017, my wife received a request to submit her passport to
23 a Visa Processing Center, which is the last stage in her application. After the issuance
24 of the immigration Visa stamp, she is supposed to land in Canada normally within 3
25 months. Because of this newest ban, I will have to personally take a flight from Seattle
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1 to Los Angeles to drop off her passport to the Canada Visa Application center, to get
2 Canada immigration Visa stamped on her passport within a week or 10 days and then
3 fly back to pick it up. Then I will have to immediately go to the Canada border when
4 she lands in Canada otherwise she may lose her PR status before October 18, 2017. Me
5 and my wife are going through many traumatic events as well as many
6 unplanned/unnecessary trips due to this newest ban.

- 7
- 8 9. My current employer decided to file H1B/H4 petition (it got approved Sept 26th, 2017)
9 with a possibility for employment based green card application due to my significant
10 contributions to the company and significance of my role in the organization. This new
11 travel ban impacted my productivity in the company since I have to actively deal with
12 this hurdle as opposed to keep focusing to my current roles benefiting the growth of the
13 company in long run. So I have considered to move back to the Canada in spite of
14 many efforts done by my company to get me H1B as well as many efforts in my side to
15 establish a long term impact to the company.
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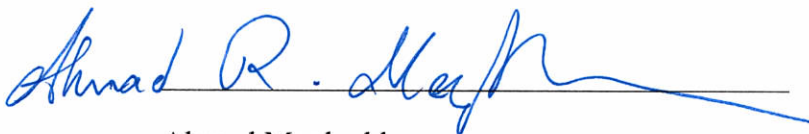
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18 I declare under penalty of perjury that the foregoing is true and correct.

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20 Executed on this 9 day of October, 2017

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23 Ahmad Moghaddam