

DECLARATION OF MOHAMMAD GHAEDI

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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

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

1. I am over the age of eighteen and competent to testify herein.
2. I live in Washington State and I am hugely impacted by travel ban 3.
3. I am an Iranian PhD student and instructor at Washington State University School of Politics, Philosophy and Public Affairs.
4. My dissertation for my PhD is on the impact of tribal structure of some countries and its impact on committing terrorist activities.
5. I have a valid multiple-entry visa issued from the US embassy in Germany. I have been vetted twice, first when I applied for my student visa at the US embassy in Turkey in

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2014 and second time (after it expired) I applied for another student visa in Germany. The second time it took 40 days to get vetted and get my visa issued.

- 6. After travel ban 1, I cancelled my travel to Iran which was intended to collect data for my dissertation, including in-depth interviews and a survey in the region. In addition, I cancelled my presentation in two international conferences in which I had accepted papers (WPSA in Canada and ISPP in Scotland) because I might not have been able to get back to US to finish my PhD due to travel ban. Attending these conferences is critical because I could present my papers and get feedback on my research from experts in my field. In addition, presenting in these conferences illustrates a scholar's professionalism and commitment to the community of experts in the field and builds up one's resume. Moreover, at these conferences, researchers have opportunity to find other scholars with similar research fields to cooperate on future common scientific projects.
- 7. I have applied for my mother and adopted son to be able to travel to the United States. Their appointment was cancelled twice after the first two executive orders. When the appointment was rescheduled, they traveled from Iran to Dubai for the embassy's interview. Neither of their visas were approved so I am still working on getting documents together to support their applications. I hoped to schedule another appointment for my mother at the US embassy in Turkey soon but travel ban3 destroyed our hopes. Neither of them will have their visas by October 18, 2017.
- 8. I have not seen my mother from Aguste 2016 and due to my department's request (not to leave the country before the end of Ph.D.) I cannot travel to Iran to see her. The

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other option is to have my mother travel here for a visit and that requires her to get a visa which is not possible under travel ban3. Me and my mother are very close and not being able to see her has a great impact on my life including my work and research.

9. My research is on terrorism and has implication for counter-terrorism. I am born and raised in the Middle East and I am familiar with cultural nuances and languages.

Therefore, the research I am doing is beneficial for both academy and practitioners in the US.

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

Executed on this 6th day of October, 2017

Mohammad Ghaedi

