

SECOND
DECLARATION OF
KATHY OLIVE

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

10 STATE OF WASHINGTON, et al.,

11 Plaintiffs,

12 v.

13 DONALD TRUMP, et al.,

14 Defendants.

CIVIL ACTION NO. 2:17-cv-00141-JLR

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17 Pursuant to 28 U.S.C. § 1746(2), I Kathy Oline, hereby declare as follows:

- 18
- 19 1. I am the Assistant Director of Research and Fiscal Analysis for the Washington State
20 Department of Revenue. I have personal knowledge of the matters stated herein, and if
21 called as a witness, I would testify competently to this information.
 - 22 2. I have reviewed the September 24, 2017 presidential proclamation, which restricts entry
23 into the United States from the following eight countries: Iran, Syria, Yemen, Chad, Libya,
24 Somalia, North Korea, and Venezuela.
 - 25 3. In 2016, the most recent year for which data is available, tourists spent approximately
26 \$21,400,000,000 (\$21.4 billion) in Washington State.

- 1 4. Approximately fourteen percent (14%) of tourism spending in Washington State is
2 attributable to international visitors. I obtained this figure from a 2013 report prepared for
3 the Washington Tourism Alliance by Dean Runyan Associates.
- 4 5. Assuming that 14% of tourism spending in 2016 was from international visitors, I
5 determined that approximately \$3,000,000,000 (\$3 billion) of Washington State tourism
6 spending was attributable to international tourists in 2016.
- 7 6. The State does not have statistics indicating how many visitors from each individual country
8 traveled to Washington State in 2016. I estimated the number of travelers from each country
9 by referring to the data published by the U.S. Department of Commerce and the U.S.
10 Department of Homeland Security Form I-94.
- 11 7. The Department of Commerce reports the number of people that arrive in the United States
12 from nine world regions: Western Europe, Eastern Europe, Asia, the Middle East, Africa,
13 Oceania, South America, Central America, and the Caribbean.
- 14 8. Using this regional data, I calculated the amount attributable to each country in the region.
15 To do this, I divided each impacted country's population by the regional population. This
16 allowed me to determine the percentage of each region's population attributable to the
17 individual impacted countries. I then applied this percentage to the regional traveler arrival
18 statistics, to estimate how many travelers arrived in the United States from each of the
19 impacted countries in 2016. I did not use this method to determine international arrivals to
20 the United States from Venezuela, because the Department of Commerce reported specific
21 arrival data for that country.
- 22 9. With these percentages, I then estimated how much of the international tourism spending in
23 Washington State (\$3 billion) was attributable to visitors from these eight countries. First, I
24 assumed that the estimated percentage of visitors from each country was the same in
25 Washington. Next, I multiplied each of these percentages by \$3 billion to estimate how
26 much of the international tourism spending in Washington State (\$3 billion) was attributable

1 to each of these eight countries. I then reduced the figure for Venezuela by 90%, because
 2 the presidential proclamation allows most travel from Venezuela to continue.

3 10. I have prepared the following table, indicating the estimated amount of money spent in
 4 Washington State, in 2016, from tourists from the eight countries impacted by the
 5 presidential proclamation.

Tourism Spending in Washington State	2016 Spending	6.5% State Sales Tax	2.5355% Average Local Sales Tax	.00471% Retailing B&O Tax	Annual Tax Impact
Total Traveler Spending	\$21,400,000,000	\$1,391,000,000	\$542,597,000	\$100,794,000	
International Travel Spending	\$3,000,000,000	\$195,000,000	\$76,065,000	\$14,130,000	\$285,195,000
Spending by:					
Chad	\$231,015	\$15,016	\$5,857	\$1,088	\$21,961
Iran	\$10,042,919	\$652,790	\$254,638	\$47,302	\$954,730
Libya	\$127,277	\$8,273	\$3,227	\$599	\$12,100
North Korea	\$991,705	\$64,461	\$25,145	\$4,671	\$94,276
Syria	\$2,207,459	\$143,485	\$55,970	\$10,397	\$209,852
Venezuela	\$2,300,747	\$149,549	\$58,335	\$10,837	\$218,720
Yemen	\$3,432,897	\$223,138	\$87,041	\$16,169	\$326,348
Somalia	\$211,032	\$13,717	\$5,351	\$994	\$20,062
Total	\$19,545,051	\$1,270,428	\$495,565	\$92,057	\$1,858,050

11. As the table above reflects, tourists from these eight countries spent an estimated
 12 \$19,545,051 in Washington State in 2016.

13. In 2016, the amount spent by tourists from the eight impacted countries generated an
 14 estimated \$1,858,050 in tax revenue for Washington State and its local taxing districts.

15. A decrease in the number of tourists visiting Washington from these eight countries will
 16 correspondingly decrease state and local tax revenue. By barring visitors from these
 17 countries, the presidential proclamation will reduce the tax revenue the State of Washington
 18 otherwise would have received.

19. In addition, tourists often incur additional taxes in Washington, such as the convention
 20 center tax, special hotel/motel tax, tourism, promotion area tax, and an added tax on rental

1 cars. In fiscal year 2016, these taxes generated approximately \$145 million in revenue from
2 international and domestic tourists, as well as local residents.

3 15. The tax revenue figures I have provided do not include revenue generated from other state
4 taxes, such as Washington's spirits tax, marijuana excise tax, or cigarette tax.
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6 16. I declare under penalty of perjury of the laws of Washington that the foregoing is true and
7 correct.

8 Executed on this 10 day of October, 2017

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11 KATHY OLIVE
12 Assistant Director of Research and Fiscal Analysis
13 Washington State Department of Revenue
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