

SECOND  
DECLARATION OF  
RITA ZAWAIDEH

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The Honorable James Robart

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

STATE OF WASHINGTON, et al.,  
Plaintiffs,

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

v.

DONALD TRUMP, et al.,  
Defendants.

SECOND DECLARATION OF RITA  
ZAWAIDEH

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

1. I am over the age of 18 and competent to be a witness. I am a resident of the State of Washington. I make this declaration to update and supplement the previous declaration that I submitted in this matter dated March 9, 2017.
2. I am the founder and owner of Caravan-Serai, Inc. Caravan-Serai is a tour company located in Seattle that organizes tours to the Middle East and North Africa exclusively. I have been

1 in business for 30 years. Since 2003, Caravan-Serai has been rated by Conde Nast Traveler  
2 magazine as a Top Travel Specialist.

3 3. I am also the founder of Salaam Cultural Museum (SCM). SCM is a 501(c)(3) nonprofit  
4 organization that focuses on the specific task of bringing relief and aid to people affected  
5 by conflict and natural disaster within the Middle East and North Africa (MENA) region,  
6 and to bring people and cultures together to build bridges of understanding. SCM organizes  
7 medical and humanitarian missions to Greece and Jordan to assist Syrian refugees fleeing  
8 from the civil war in their country. I founded SCM in 1990.

9 4. Since President Trump issued his first Executive Order on January 27, 2017, Caravan-  
10 Serai's business has almost completely evaporated. Since submitting my initial declaration  
11 in March, 2017, I have organized one (1) group tour for about 5 individuals. Last year, in  
12 the same period of time, from March to October, I had about five (5) to ten (10) group tours  
13 *per month* for from seven (7) to fifteen (15) people each.

14 5. During this same, from March 2017 to the present, I have organized a total of about ten (10)  
15 Foreign Independent Travel tours for 1 or 2 individuals each. Last year, for the same period  
16 of time, I organized around ten (10) to twenty (20) of these tours *per month*. My customers  
17 have told me that they are simply afraid to travel because they are concerned about whether  
18 they will be able to reenter the United States when they return from their trip. Even U.S.  
19 citizens have told me that they are afraid to go.

20 6. I have also had to cancel all planned SCM medical humanitarian missions. These are  
21 missions that I organize to send physicians and other health care professionals to Greece  
22 and Jordan to provide medical care to Syrian refugees. The physicians and other  
23 professionals who would go, many of whom are natives of the Middle East and North Africa  
24 but are U.S. citizens, have also told me that they are afraid to go on the mission for fear of  
25 not being able to reenter the U.S. or being subjected to severe harassment and scrutiny by  
26 U.S. Customs and Border Protection upon their return.

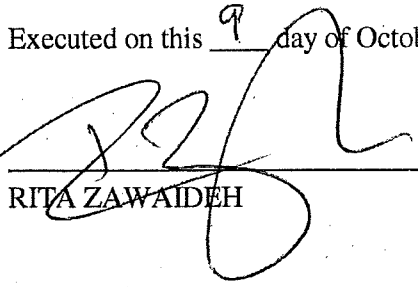
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7. I normally would organize a medical humanitarian mission every 45 days, and they would consist of 15 to 20 physicians and other health care professionals. I had one mission organized for next month, November, 2017, but it is likely now that I will have to cancel that mission as well because of the participants' fears as noted above.

8. The President's Executive Order of January 27, 2017, as well as the second one that became effective March 16, 2017, has caused my business to lose almost all of its revenue. My revenue is down by approximately eighty percent (80%). I have had to reduce my employees' hours by half. However, even with that reduction, I cannot continue to employ them indefinitely if I have no income from which to pay them.

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

Executed on this 9 day of October, 2017, at Seattle, Washington.

  
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RITA ZAWAIDEH