

SECOND
DECLARATION OF
MELANIE DE LEON

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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

SECOND DECLARATION OF
MELANIE DE LEON

Pursuant to 28 U.S.C. § 1746(2), I Melanie de Leon, hereby declare as follows:

1. I am the Executive Director of the Washington State Medical Quality Assurance Commission (“Medical Commission”) and have personal knowledge of the facts set forth in this declaration.
2. The Medical Commission regulates all allopathic physicians and physician assistants practicing on Washington patients through licensing discipline, rulemaking and education.

1 3. The Medical Commission’s mission, as set forth in statutes RCW 18.71 and 18.71A, is to
2 protect public health and promote the integrity of the profession. The health and well-being
3 of the people of Washington are of paramount importance and the conduct of those licensed
4 to practice medicine and surgery in this state plays a vital role in preserving this health and
5 well-being.
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7 4. Information regarding the applicant’s country of birth is not available prior to 2008, and
8 is only captured on the original licensing application, not subsequent renewals; therefore
9 reported statistics involving this information may underrepresent the true numbers of
10 applicants or licensees from any given location, either inside or outside of the United States.
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12 5. Out of the 13,727 licenses issued or reactivated since 2008, the following indicates the
13 number of active licensees who indicate the following countries as their birth country:

Iran		80
	Pending (in process)	3
Iraq		14
	Pending (in process)	1
People’s Republic of North Korea		3
Libyan Arab Jamahiriya		6
	Pending (in process)	1
Somalia		2
Syrian Arab Republic		24
	Pending (in process)	3
Venezuela		7
	Pending (in process)	1
Yemen		1
	Pending (in process)	1

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24 6. The Medical Commission also issues limited licenses for residents, fellows and
25 teaching and research.
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- 1 a. Residency licenses are issued to physicians who have completed all of the
2 requirements for licensure except for completion of two years of postgraduate
3 training and have been appointed as a resident physician in a program of
4 postgraduate clinical training in Washington. The Medical Commission has
5 issued active limited licenses to eight applicants from Iran.
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- 7 b. Upon nomination by the dean of the school of medicine of the University of
8 Washington or the chief executive officer of any hospital or appropriate health
9 care facility licensed in the state, the Medical Commission may issue a limited
10 license to an applicant selected by its designated sponsoring institution to be
11 enrolled in one of its designated departmental or divisional fellowship
12 programs. Fellowship programs provide focused training in a narrow specialty
13 area. There is currently one active fellowship license issued to an applicant
14 from Iran and one active fellowship license to an applicant from Libya.
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- 16 c. Upon nomination by the dean of the school of medicine of the University of
17 Washington or the chief executive officer of any hospital or appropriate health
18 care facility licensed in the state, the Medical Commission may issue a limited
19 license to a physician applicant invited to serve as a teaching-research member
20 of the institution's instructional staff. There is currently one active teaching and
21 research license issued to a physician from Venezuela. .
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- 23 7. The Medical Commission has found it appropriate to license applicants who may have
24 completed all or a portion of their medical training in an international setting. Based upon
25 census data gathered in October 2017, the Medical Commission has 3391 active licensees
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1 who were internationally trained. Of this number, 80 active licensees received all or part of
2 their medical education in Iran, 14 active licensees from Iraq, three active licensees from
3 North Korea, six active licensees from Libya, two active licensees from Somalia, 24 active
4 licensees from Syria, seven active licensees from Venezuela and one active licensee from
5 Yemen.
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7 I declare under penalty of perjury that the foregoing is true and correct.

8 Executed on this 6th day of October, 2017

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11 Melanie de Leon, JD, MPA
12 Executive Director
13 Medical Quality Assurance Commission
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