

DECLARATION OF
PAYAM
FOTOUHIYEHPOUR

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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 PAYAM
FOTOUHIYEHPOUR**

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

1. I am over the age of eighteen and competent to testify herein.
2. I live in Washington State.
3. I am originally from Iran. I came to the United States in 2009 as permanent resident (green card holder).
4. Since Jan 7, 2016 I am citizen of the USA
5. I am a quality manager in medical device industry and my knowledge, experience and competencies in this area are critical for public safety and wellbeing with regard to the

1 criticality of design and manufacturing of safe and high performance medical devices.

2 Currently I am a full time employee of Philips Healthcare (Bothell WA)

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- 4 6. My mother and brother live in Iran. They will not have visas to enter the United States
- 5 by October 18, 2017. There is no reasonable level of confidence in my safety to travel
- 6 to Iran in its current political status (because of my political views). My only tangible
- 7 option to be with my mother or brother is completely destroyed if the President's
- 8 September 24, 2017 Proclamation is implemented with unlimited travel ban on
- 9 Iranians. It is obvious that safety and security of my family, including my wife and my
- 10 daughter (both American citizens) are crucially important for me and I support any
- 11 reasonable governmental decision which improves the level of safety for my family and
- 12 all the residents of the USA. But preventing ordinary Iranians, like my 70 years old
- 13 cancer survivor mother or my 36 years old violin teacher brother, who already go
- 14 through very detailed and extreme visa application and interview processes, doesn't add
- 15 any preventive measure to our national security and safety. On the other hand, this ban
- 16 abridges my privileges in using specific visa programs which have been designed and
- 17 implemented for American citizens to enable them to host their family members from
- 18 foreign countries; and it is a discrimination against me based on my Iranian ethnicity.
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- 21 7. It is very troubling and painful for my daughter, my wife and I to be separated from our
- 22 family members for unlimited time, and only have the option to visit them in a third
- 23 country for short periods with considerably higher cost. But this matter for me is more
- 24 fundamental than emotional damages. If I would be deprived of bringing my family
- 25 members to the USA through ordinary legal processes which are available for all the
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1 American citizens, I have no option other than finding a new country for living, in
2 where, my rights and privileges as a legal resident and a decent member of the
3 community would not be manipulated or compromised by discriminative decisions of
4 the government. This was the main reason for me to leave Iran and choose the USA as
5 my new home; and to be clear I love and respect my home. But I cannot live in a home
6 where I am not welcome and being treated like a second class citizen.
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8 I declare under penalty of perjury that the foregoing is true and correct.

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10 Executed on this 5 day of October, 2017

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13 Payam Fotouhiyehpour
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