

SECOND  
DECLARATION OF  
SANA PARSIAN

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**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 SANA  
PARSIAN**

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

1. I am over the age of eighteen and competent to testify herein.
2. I am a Washington State resident.
3. I am a dual United States citizen and Iranian citizen.
4. I came to the United States in 2010 to continue my education in radiology. I earned my MD from Tehran University of Medical Sciences in 2009. Last year, I completed my last year of residency as Chief Resident at the University of Washington Medical Center Diagnostic Radiology Residency.
5. I currently work as a Breast Imaging Sr. Fellow and Acting Instructor at Seattle Cancer Care Alliance. I help with early diagnosis of breast cancer by interpreting mammograms ,

1 ultrasounds, breast MRIs and with biopsy of suspicious lesions. I also teach the radiology  
2 residents and work on my research project for which I was awarded a research grant last  
3 year.

4 6. I am affiliated with UW Medicine and Seattle Cancer Care Alliance.

5 7. My husband is a United States citizen. He was born in the United States. His parents are  
6 from Iran.

7 8. My husband is a software developer and entrepreneur. He owns his own company with  
8 more than 30 employees. He works very hard and his business is growing.

9 9. When I became a United States citizen, I felt like an American. Now, I am not sure  
10 anymore and I feel like a second-class citizen. My husband and I are hardworking people  
11 and we have had many opportunities in the United States. Many Americans have  
12 supported me on my journey and I am very thankful to this country and its kind people.  
13 However, because of the President's September 24, 2017 Proclamation, I am uncertain  
14 about my future in the United States.

15 10. My parents live in Iran. My mom is an English teacher and my dad was a statistics  
16 professor at Tehran University, now retired. He got his PhD in the United States. Both of  
17 my parents are getting old. They are both on medications and have new prescriptions  
18 being added. As a doctor with the means to help them, it is my duty and right to care for  
19 my parents in their old age.

20 11. I applied for green cards for both of my parents in April 2016. My mom's was approved  
21 in December 2016. She was coming here in January 2017, when the President's first  
22 Executive Order banning travel from Iran went into effect. She was returned to Iran from  
23  
24  
25  
26

1 Amsterdam and was not able to come to the United States until March 2017 when the first  
2 ban was lifted by the courts.

3 12. My mom will not remain in the United States without my dad. Therefore, she has been  
4 traveling to the United States every six months as opposed to staying here with me. It has  
5 been hard on my mom to take flights that are over 20 hours every six months so that she  
6 can keep her green card. It is too hard on my mom to keep doing this specially given the  
7 indefinite nature of the new ban. She is constantly worried about my dad who has to live  
8 alone in our house in Iran when she is staying with me.

9  
10 13. My dad's green card has been in the process of security check since December 2016. He  
11 does not have any criminal history. I have no hope for him to get his green card or a travel  
12 visa before October 17, 2017. I do not know if he will ever be granted a green card or not  
13 and I am not sure if I can get a waiver for him.

14  
15 14. This has resulted in a high degree of stress in my life. I am a doctor, but I am being  
16 prevented from taking care of my dearest loved ones, my parents. Every time I hear of a  
17 new medication being added to their list, it breaks my heart. It is my basic human right to  
18 be able to care for my family when they need me.

19  
20 15. My plan has been to complete my fellowship in breast imaging and then to take a job as a  
21 Radiologist in Tacoma/Olympia area. I received offers from all 4 practices that I applied  
22 to. However, the President's September 24, 2017 Proclamation has made me reconsider  
23 my plan. I am not sure if I should remain in the United States if to do so requires me to  
24 abandon my parents when they need me most. If anything happens to them I can not  
25 forgive myself.

26

1 16. Because of the President's September 24, 2017 Proclamation, I am now planning to go to  
2 Iran in order to see my dad. I have not seen him now for 3 years. In addition to the time  
3 this will take me away from my work and research, this trip comes at a personal cost to  
4 myself based on the likelihood of being targeted by Iran's government given my dual  
5 citizenship status. My parents have been warning me not to go because of several  
6 instances of dual citizens being targeted by Iran's government. I now have no choice but  
7 to risk my own safety and carrier in order for me to see to my dad's health and wellbeing.  
8

9  
10  
11 I declare under penalty of perjury that the foregoing is true and correct.

12 Executed on 3<sup>rd</sup> of October, 2017

13   
14 ~~SANA PARSIAN~~

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26