

SECOND
DECLARATION OF
MARGARET
EVERETT

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10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE WESTERN DISTRICT OF WASHINGTON**

12 STATE OF WASHINGTON, et al.,
13 Plaintiffs,
14 v.
15 DONALD TRUMP, et al.,
16 Defendants.
17

CIVIL ACTION NO. 2:17-cv-00141-JLR
SUPPLEMENTAL DECLARATION OF
MARGARET EVERETT

18 I, Margaret Everett, hereby declare and affirm as follows:

- 19 1. I am over the age of 18 and competent to testify.
20 2. I am employed by Portland State University (“PSU”) and serve as Interim Provost and
21 Vice President for Academic Affairs. I have personal knowledge of the facts set forth in
22 this declaration and I am competent to testify about them.
23 3. Portland State University is an urban public research university located in downtown
24 Portland, Oregon. PSU’s Mission is to serve and sustain a vibrant urban region through
25 creativity, collective knowledge, and expertise. The research and teaching of PSU has a
26 global impact. PSU is dedicated to collaborative learning, innovative research,

1 sustainability, and community engagement among a diverse community of life-long
2 learners.

- 3 4. Consistent with that Mission, Portland State University has a rich and diverse student
4 body, including a significant number of international students who are an essential part of
5 the community, who add to and enhance the experience of all students, and who provide
6 an important part of PSU's enrollment revenue.
- 7 5. Portland State University has a current enrollment of approximately 25,000 students, with
8 approximately seven percent (7%), or 1755, being international students. "International
9 students" are foreign nationals studying at PSU pursuant to a U.S. government-issued
10 visa.
- 11 6. I am familiar with the September 24, 2017, Proclamation entitled "Presidential
12 Proclamation Enhancing Vetting Capabilities and Processes for Detecting Attempted
13 Entry Into the United States by Terrorists or Other Public-Safety Threats," which I
14 understand would bar certain classes of persons entering the United States who are
15 citizens of any of the following eight countries: Chad, Iran, Libya, North Korea, Syria,
16 Venezuela, Yemen, and Somalia ("the affected countries").
- 17 7. Of the 1755 international students enrolled at PSU during the current academic term, 61
18 students are citizens of five of the affected countries. The 61 students are at PSU under
19 valid student visas. I believe these 61 students, along with all international students,
20 enhance the educational experience of all students, faculty and staff at Portland State
21 University.
- 22 8. The largest number of these students—27 of the 61—are from Iran. Under the
23 Proclamation, holders of student (F and M) and visitor (J) visas from Iran are to "be
24 subject to enhanced screening and vetting requirements" upon entry to the United States.
25 I am concerned about the impact of such enhanced and unclear requirements on current
26 and prospective students from Iran and anticipate that these requirements are of

1 significant concern to the impacted students. In addition, PSU currently sponsors a
2 Research Scholar from Iran with a J1 visa and employs a faculty member from Iran with
3 a H1B visa. There would be a detrimental impact on research and/or teaching at PSU if
4 either the research scholar or faculty member were unable to enter the United States.

5 9. Also included within the 61 international students are several students from Syria. Under
6 the Proclamation, “the entry into the United States of nationals from Syria as immigrants
7 and nonimmigrants is hereby suspended.” I am concerned about the impact of this
8 restriction on current and prospective students from Syria and anticipate that such
9 restriction is of significant concern to the impacted students.

10 10. International students at PSU pay non-resident tuition and fee rates which are
11 significantly higher than in-state resident tuition and fee rates. I have consulted with the
12 University Budget Office and am informed that approximately \$33 million of Portland
13 State University’s net tuition and fee revenue in academic year 2015-16 was derived from
14 international students. This amount is approximately 13% of PSU’s total net tuition and
15 fees for 2015-16. This amount does not include housing or other auxiliary revenues
16 received by PSU from international students.¹

17 11. Recent Executive Orders impacting international students have had a chilling effect on
18 the PSU community and a negative impact on the lives of affected international students.
19 I expect the Proclamation will have a similar chilling effect. As noted in my prior
20 declaration, PSU previously advised students impacted by the Executive Order not to
21 leave the country out of concern they would not be able to return to resume their studies.
22 PSU is currently advising students affected by the Proclamation to consult with their PSU
23 International Student Advisor before travelling internationally or if otherwise concerned

24 ¹ I understand it is estimated that in 2015, Portland State University’s international students
25 contributed \$71.1 million to the U.S. economy, supporting 877 jobs. See NAFSA: Association of
26 International Educators at <https://istart.iu.edu/nafsa/reports/state.cfm?state=OR&year=2015>.

1 about the impact of the Proclamation on them or their families.

2 12. I understand that international students and their parents, as well as faculty and staff, are
3 worried about the travel restrictions generally, and specifically, for students from the
4 affected countries. Some international students at PSU are worried about their ability to
5 travel to their home countries and then be able to return to complete their studies,
6 particularly in the event of a family or other emergency, and about the ability of family
7 members to visit or to attend significant events such as commencement.

8 13. In addition, PSU has significant partnerships with foreign universities outside of the
9 affected countries through which students can transfer to PSU and from which PSU
10 derives a significant number of its international students. I have heard from such
11 partnership universities with concerns about the safety and fair treatment of their students
12 in the United States in light of the travel restrictions imposed by the Executive Orders
13 and Proclamation.

14 14. We have seen negative impacts to the personal and professional lives of persons affiliated
15 with PSU as a result of the Executive Orders and anticipate similar negative impacts from
16 the Proclamation.

17 15. In addition to current student, staff, and faculty impacts, Portland State University is
18 concerned about future negative impacts from the travel restrictions. PSU accepts
19 student applications year-round. PSU has received 12 applications from students from
20 Iran seeking admission for future academic terms (one undergraduate student application
21 for Winter term 2018, seven graduate student applications for Winter term 2018, and four
22 graduate student applications for Spring term 2018). Some of those applicants have been
23 admitted and some are pending a decision. I am not currently aware whether any of these
24 students have been able to secure the visa necessary to study at PSU. If any of these
25 admitted students are unable to enter the United States, PSU will lose the revenue that
26 would be realized from the tuition and fees to be paid by these students and the

1 educational experience and environment at PSU will not be enhanced by their presence
2 on campus.

3 16. It is my understanding and belief that many of the international students we have in our
4 PSU community are provided a scholarship or other support by their home governments
5 to pursue studies in fields such as Engineering, Urban Planning and Public
6 Administration in order to contribute to rebuilding and civic improvement efforts in their
7 home countries after graduation. I believe that the ability of these students to create
8 positive connections and lasting ties with fellow students, the PSU community, Oregon,
9 and the United States as a whole, is in our national interest and that alienating PSU's
10 current and prospective international students runs counter to that interest. I also believe
11 that such actions are counter to the interests of PSU community and its ability to fulfill its
12 mission to its students.

13
14 I declare under penalty of perjury that the foregoing is true and correct.

15
16 Executed this 12 day of October, 2017

17 
18 Margaret Everett