

Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STATE OF WASHINGTON,

Plaintiff,

v.

DONALD TRUMP, in his official capacity as  
President of the United States; U.S.  
DEPARTMENT OF HOMELAND  
SECURITY; JOHN F. KELLY, in his official  
capacity as Secretary of the Department of  
Homeland Security; TOM SHANNON, in his  
official capacity as Acting Secretary of State;  
and the UNITED STATES OF AMERICA,

Defendants.

No. 2:17-cv-00141

SECOND DECLARATION OF EMILY  
CHIANG

I, Emily Chiang, declare as follows:

1. I am over the age of eighteen, am competent to testify to the matters below, and  
make this declaration based on personal knowledge.

2. I am the Legal Director of the American Civil Liberties Union of Washington  
("ACLU-WA").

1           3.     I oversee and administer the Legal Department of the ACLU-WA, including all  
2 active litigation and intake.

3           4.     Since the President signed his Executive Order on January 27, 2017, we have  
4 received numerous calls and emails from individuals affected by the Order. Some of those  
5 communications are described in the first declaration I filed in this matter.  
6

7           5.     One citizen residing in Washington contacted the ACLU-WA to express that the  
8 ban was obstructing her ability to reunite with her husband and her stepdaughter, who after two  
9 years of vetting had obtained CR-1 and CR-2 visas to join her in Washington. Her husband and  
10 stepdaughter are from Iran. She fears that the ban will force her to leave the United States to  
11 start a life with her family elsewhere. She is torn between her husband and stepdaughter, who  
12 are banned from entering the United States, and her ailing mother, who is unable to travel.  
13

14           6.     A United States citizen and her husband, a Syrian citizen who holds a CR-1 visa,  
15 who are currently in Europe after finishing graduate education programs. They had planned to  
16 return to the United States in early February 2017, but now fear that they will be denied entry to  
17 the United States and will be unable to reunite with their family, all of whom live in Washington.  
18 They are uncertain where they will work or live because their work contracts have ended and  
19 they moved out of their residence in anticipation of their return to the United States.  
20

21           7.     Another individual called seeking legal help for his brother, who had a flight from  
22 Canada arriving at Seattle-Tacoma International Airport at the end of January 2017. His brother  
23 holds an Iranian passport but is a Canadian permanent resident and had obtained a work visa to  
24 join his family in the United States.

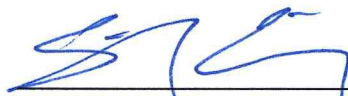
25           8.     One individual contacted the ACLU-WA regarding her ailing mother, who is a  
26 legal permanent resident but has been undergoing cancer treatment in Iraq, where it is less  
27

1 expensive. Her mother's health has improved and she had hoped that her mother could rejoin  
2 her in the United States. She had planned to travel abroad in two weeks to visit her mother and  
3 bring her home to the United States, but due to the ban she is fearful that they will be denied re-  
4 entry because they were both born in Iraq. Her fear is compounded by her concern for her young  
5 daughter, who planned to stay behind in Washington and would be entirely alone if her mother  
6 and grandmother were unable to return.  
7

8 9. A Syrian refugee family currently residing in Washington reached out to the  
9 ACLU-WA to seek help for their son, daughter, and son-in-law who had obtained the necessary  
10 approval to rejoin their family in Washington on January 30, 2017. They were turned away at  
11 the airport in Turkey due to the Order. They had already given up their housing and employment  
12 in anticipation of their move to the United States. They are from Aleppo, Syria and are afraid to  
13 return due to the conflict there, especially given that the daughter is pregnant.  
14

15 I declare under penalty of perjury under of the laws of the state of Washington that the  
16 foregoing is true and correct.

17 EXECUTED on the 2nd day of February, 2017.

18  
19 

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25 echiang@aclu-wa.org  
26  
27

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 2nd day of February, 2017, I electronically filed the foregoing  
3 document with the United States District Court ECF system, which will send notification of such  
4 filing to the following:

5  
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30 *Kelly, Tom Shannon, and United States of*  
31 *America*

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*Attorneys for Amicus Americans United for  
Church and State*

Signed at Seattle, Washington this 2nd day of February, 2017.



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Katie Dillon