

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT, WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STATE OF WASHINGTON,

Plaintiff,

No. 2:17-cv-00141-JLR

v.

DECLARATION OF TRISHA PANDE IN
SUPPORT OF PLAINTIFF STATE OF
WASHINGTON

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.

I, Trisha Pande, declare as follows:

1. I make this declaration based on personal knowledge, and am competent to testify to the matters herein.

2. I am a law fellow at the Service Employees International Union (SEIU).

3. Since President Trump signed his Executive Order on January 27, 2017, the SEIU has received many communications from members and those in their families and communities who are adversely affected by the Order. These individuals are legitimately afraid of reprisals, and therefore wish their identities to remain confidential.

4. The stories of some of these individuals are discussed below.

1 5. Sara is a 33-year-old registered nurse and member of SEIU 1199NW. She lives in
2 Seattle with her four children. She came to the U.S. from Somalia when she was 12 years old.
3 Both Sara and her parents are U.S. citizens; however, almost all the members of her extended
4 family live in Somalia. Sara is adversely impacted by the Executive Order because her legitimate
5 fear prevents her from travelling back to Somalia to visit her family. She has spent most of her
6 life in the U.S. and considers this her home and her country. Sara is now afraid that if she leaves
7 the U.S. she will not be able to get back in. Sara is also worried that her relatives will never be
8 able to come to the U.S. and visit her and her children. Sara's father is currently in Somalia
9 visiting her grandmother. Her father is a diabetic and while he was in Somalia developed a bad
10 foot infection. His treatment in Somalia did not go very well and he needs to return to the U.S.
11 for medical treatment. Sara fears that her father, even though a U.S. citizen, will get detained
12 trying to re-enter the U.S. He is a senior citizen and in need of immediate medical attention and
13 will face serious health risks if he is detained.

14 6. Dasin was born in Iraq and lived there until 2012. He is Muslim. His father and
15 uncle both worked for the U.S. Army in Iraq for about four years. Dasin often helped them while
16 they were working. When the U.S. Army left Iraq it was very dangerous for Dasin and his
17 family. ISIS planted a bomb in front of Dasin's home. The bomb exploded, injuring Dasin in
18 the face and neck. After he recovered, Dasin and his family went to Turkey as refugees. Dasin
19 had trouble finding work in Turkey because he was a refugee and faced discrimination. Dasin
20 came to the U.S. in 2013 and now lives in Seattle, Washington with his four siblings and his
21 parents. He went to high school and graduated in 2015. He now works part-time as a dispatcher
22 for a large company and part-time as a driver. Dasin is impacted by the Executive Order because
23 he has many family members in Iraq that he can no longer see. Dasin's family hoped to bring
24 over Dasin's grandfather, grandmother, and uncle. Dasin fears that if his relatives do not make it
25 to the U.S. they will be killed in Iraq. Dasin also has two close friends, also Iraqi refugees, that
26 he met while living in Turkey. They waited several years before scheduling flights to come to the
27 U.S. this month. However, they had to cancel their flights after the Executive Order.

1 7. Nadia is 21 years old, and Muslim. She was born in the United States and is a
2 U.S. citizen. Her parents are both U.S. citizens and originally from Somalia. Her mother is a
3 childcare worker and SEIU member 925. Nadia is currently studying to become a social worker
4 and working part-time as a caregiver for her grandmother. She lives at home with her two
5 parents and three siblings in Auburn, WA. Her father is currently in Somalia visiting her
6 extensive family there. She has never visited her family in Somalia because it is too expensive.
7 Nadia is adversely impacted by the Executive Order because she hopes to be married in the U.S.
8 to a Yemeni citizen currently residing in Saudi Arabia. Nadia was introduced to her fiancé
9 through her parents. Nadia's parents met her fiancé while on pilgrimage in Saudi Arabia. Nadia's
10 parents thought the man would be a good match for Nadia and put her in touch with him. Nadia
11 and her fiancé spoke by phone and video chat for several months before she decided to visit him
12 in Saudi Arabia. Nadia spent more than a month with her fiancé. During the time that she spent
13 in Saudi Arabia with her fiancé, she became increasingly drawn to his kindness, thoughtfulness,
14 and great personality, and eventually the couple decided to get married. When Nadia returned to
15 the U.S. in March of 2016, she filed an immigration application for her fiancé, a K-1 "fiancé"
16 visa. She submitted all the paperwork and her fiancé's application was approved pending a final
17 interview at the U.S. Embassy abroad. Nadia is scared for both herself and her fiancé. She is
18 "scared that [the Executive Order] is something that can happen" in this country. Nadia said she
19 is worried she will have to move to Saudi Arabia to be with her fiancé, and leave her home in the
20 U.S. because it is too "hard to live our lives separately." Nadia has been unable to see her fiancé,
21 whom she misses dearly, since she was last in Saudi Arabia because the expense of flying to
22 Saudi Arabia. Nadia and her fiancé stay in touch mostly through phone and video chat. Nadia's
23 fiancé told her he is really scared he will not be able to see her again. He is upset that he is
24 unable to move to the U.S. and start a life with Nadia. Nadia says they both try to stay calm by
25 waiting, praying, and hoping things will work out in the end.

26 8. John lives in a suburb of Seattle with his wife and three children. John came to the
27 United States from Iran in 1978 as a student and was recognized as a religious refugee in 1982.
28 He became a U.S. citizen in 1990. John is adversely impacted by the Executive Order because it

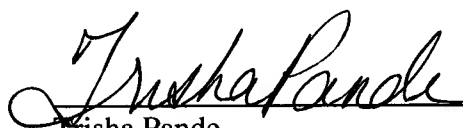
1 affects both his family and his business. John has several relatives living in Iran currently facing
2 religious persecution because they are of the Baha'i faith. John's parents fled Iran in 1982 after
3 three of John's uncles were killed by an Iranian firing squad. John is now worried that his
4 relatives cannot come to the United States or visit him and his family because of the immigration
5 ban. John also has relatives who are Iranian citizens but reside all over the world. He is also
6 worried that they cannot visit him in the United States. The Executive Order is also harming
7 John's business. John and his wife run a small health clinic in Seattle. It is a comprehensive
8 integrative clinic which mixes Western and Eastern medicine. John's clinic treats about 20
9 patients from Canada who are Iranian citizens. John sees patients from Canada every Friday at
10 his clinic, and he estimates that those patients comprise about 20 percent of his business. Those
11 patients can no longer come to the clinic from Canada because of the Executive Order. John
12 believes that President Trump put the ban in place "hastily." As John stated, "everybody has a
13 different story for why they need to come to the U.S . . . it is too simplistic to say that just
14 because you were born in a certain country that you are a terrorist."

15 9. Halima, a Muslim woman, lives in Seattle, Washington with her husband and
16 children. She came to the United States from Somalia in 2001 as a legal resident, and became a
17 U.S. citizen in 2008. Halima is a caregiver for disabled and elderly patients and has been a
18 member of SEIU Local 775 since 2008. Although Halima and two of children are U.S. citizens,
19 her husband and her other four other children are legal residents (green card holders). Her six
20 children range in age from 17 to 24. One child is in school; two of them attend community
21 college; the other three are working. The Executive Order has made Halima very worried. She
22 worries about her children every minute that they are away from home. She worries that they
23 may be attacked because of the hateful environment that this Executive Order has
24 created. Halima's four daughters all wear a hijab, and she is afraid that people will attack them
25 because of the anti-Muslim feelings the Executive Order has fueled. The husband of one of
26 Halima's friends flew into the Seattle airport on January 27, 2017 with an approved visa, but was
27 returned back to Somalia. Her friend, a U.S. citizen, was waiting for her husband and couldn't
28 even see him before he was turned around and sent back to Somalia – even though he was here

1 legally. This incident has terrorized Halima's entire family. As Halima said, "[i]f they can treat
2 people with green cards and visas the way they treated these people, who knows if they will
3 come after naturalized citizens next? No one is safe."

4 10. I declare that the foregoing is true and correct under penalty of perjury of the laws
5 of the District of Columbia and the laws of the United States.

6 EXECUTED on the 2nd day of February, 2017 in Washington, D.C.

7
8 
9 Trisha Pande

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED: February 2, 2017

/s/ Steve W. Berman

Steve W. Berman, WSBA #12536