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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

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.

DECLARATION OF ASIF CHAUDHRY

I, Asif Chaudhry, hereby declare and affirm:

1. I am the Vice President for International Programs at Washington State University (WSU), Washington State’s land grant institution and the second largest public research university in the Pacific Northwest. I have held this position since June 2015. Prior to my current role at WSU, I spent my career working for the United States Government as a Senior Foreign Service Officer, holding numerous leadership positions in the Departments of State, Defense, and Agriculture. These positions included Vice President of the Commodity Credit

1 Corporation, Foreign Policy Advisor to the Chief of the United States Navy at the Pentagon, and  
2 U.S. Ambassador to the Republic of Moldova. I have personal knowledge of the facts set forth  
3 in this declaration, and I am competent to testify about them.

4 2. As Vice President for International Programs at WSU, I have responsibility for  
5 WSU's international research activities, study abroad programs, international students, and  
6 student and faculty exchanges. I am the chief international relations officer at WSU and am  
7 responsible for the role of International Programs in carrying out WSU's mission of global  
8 engagement, which is "To apply knowledge through local and global engagement that will  
9 improve quality of life and enhance the economy of the state, nation, and world." I also manage  
10 WSU's programs focusing on establishing strategic partnerships with governments and  
11 educational institutions across the globe.

12 3. WSU's global presence includes active research programs in dozens of countries  
13 worldwide and study abroad programs in over 70 countries worldwide. The University also has  
14 matriculated undergraduate, graduate, and professional students and visiting scholars from many  
15 countries worldwide.

16 4. I have reviewed the Executive Order entitled "Protecting the Nation from Foreign  
17 Terrorist Entry Into the United States," which temporarily bars entry into this country of any  
18 person who is a citizen of any one of seven countries—Syria, Iraq, Iran, Somalia, Sudan, Libya,  
19 and Yemen.

20 5. WSU currently has approximately 136 undergraduate and graduate students who  
21 are citizens of these listed countries. These students are here under valid student visas. I believe  
22 that the presence of these students, scholars, and faculty on our campus serves to build  
23 international understanding among all the members of our community. Their presence also  
24 enriches the educational experience of all WSU students.

25 6. The implementation of the Executive Order has already had a negative impact on  
26 the lives of students and faculty from the listed countries. The fact that they will not be able to

1 travel outside of the U.S. will affect both their personal and professional lives. It will also  
2 negatively impact WSU by limiting the scope of academic activities in which these members of  
3 the WSU community will be able to engage.

4 7. There are many specific examples of the immediate impact the Executive Order  
5 has already had on WSU students and faculty. One of many examples includes graduate students  
6 doing atmospheric research, who need to travel outside the U.S. in order to conduct critical  
7 fieldwork and attend conferences. These students, like many others, are working hard on  
8 projects to improve people's lives in the U.S., their home countries, and other countries. By  
9 denying them re-entry into the U.S., the Executive Order restricts their ability to fully participate  
10 in their programs of study and also negatively impacts the academic program and unit as a whole,  
11 which is dependent on their research.

12 8. Another example over this past weekend is a student who was heading to WSU  
13 to work with faculty on irrigation water conservation research. She had gone through an  
14 11-month approval process but was turned away in Amsterdam because of the Executive Order.  
15 Not only was the student heartbroken, but her important research has been put on hold.

16 9. The Executive Order also impacts major university-wide initiatives. Like other  
17 peer institutions nation-wide, WSU has been working on expanding its international student  
18 population to increase diversity and enrich the experience of all students. In fact, WSU recently  
19 launched a major initiative to do so, partnering with other entities to create a new international  
20 student center. The success of this enterprise is dependent on the ability of students from many  
21 countries world-wide to travel to the U.S. and to WSU.


22 10. These are only a few examples of the difficulties being faced by the WSU  
23 community as a result of the Executive Order. Based on my experience in international  
24 education and research, I am concerned that the Executive Order will have a significant negative  
25 effect on the willingness of students, scholars, and faculty from other majority Muslim countries  
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1 to apply to come to a U.S. university to advance their scholarship and their academic careers.

2 The cumulative effects of these restrictions will have a significant impact on WSU.

3 I declare under penalty of perjury under the laws of the State of Washington that the  
4 foregoing is true and complete to the best of my knowledge.

5 Dated this 30th day of January, 2017.

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Asif Chaudhry, Ph.D.