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6 UNITED STATES DISTRICT COURT  
7 FOR THE WESTERN DISTRICT OF WASHINGTON  
8 AT SEATTLE

9 STATE OF WASHINGTON

10 Plaintiff,

11 v.

12 DONALD TRUMP, in his official  
13 capacity as President of the United  
14 States; U.S. DEPARTMENT OF  
15 HOMELAND SECURITY; JOHN F.  
16 KELLY, in his official capacity as  
17 Secretary of the Department of Homeland  
18 Security; TOM SHANNON, in his  
19 official capacity as Acting Secretary of  
20 State; and the UNITED STATES OF  
21 AMERICA

22 Defendants.

No.

DECLARATION OF EMILY  
CHIANG

23 I, Emily Chiang, declare as follows:

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

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

DECLARATION OF EMILY CHIANG - 1

AMERICAN CIVIL LIBERTIES UNION OF  
WASHINGTON FOUNDATION  
901 FIFTH AVENUE #630  
SEATTLE, WA 98164  
(206) 624-2184

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

3           4.     Since President Donald Trump signed his Executive Order on January 27, 2017,  
4 “Protecting the Nation from Foreign Terrorist Entry into the United States,” our office has  
5 received numerous calls and emails from affected individuals requesting assistance.

6           5.     We have been contacted by people who are en route to the United States who are  
7 concerned that they or their friends and family members will be detained or not permitted to  
8 enter the country.

9           6.     We have been contacted by people who have themselves been detained at one of  
10 Washington State’s borders or told that entry into the United States would not be permitted.

11          7.     We have been contacted by people living in Washington whose families have  
12 been separated because of the ban on refugee admissions. These individuals have vulnerable  
13 family members who may have been approved entry prior to the Executive Order but are  
14 currently barred from entering the country due to the Executive Order.

15          8.     We have been contacted by people with lawful status who are citizens of the  
16 impacted countries with plans to travel internationally in the future and are uncertain whether  
17 they will be allowed to reenter the country after they travel abroad.

18          9.     We have been contacted by people who have decided to stay overseas rather than  
19 risk ending up in the United States immigration detention system.

20          10.    A woman from a family of Syrian refugees contacted us. Her family had recently  
21 filed a family reunification petition that would have allowed her mother, father, and three  
22 siblings to come to Washington State from Jordan. The complainant was also going to visit her  
23 family in Jordan but is now afraid to leave the United States out of fear that she will not be

1 allowed to return and would therefore be separated from her family members already in  
2 Washington State.

3 11. We were contacted by a man who has lived in Washington State since 1996 and  
4 whose parents have lived here since 2011. His mother is a Syrian national and was returning  
5 from a trip to see her father (his grandfather), who was recently diagnosed with cancer. Her  
6 return date is January 30, 2017. Out of concern that she might be refused entry into the country  
7 or detained, her flight destination was changed from Los Angeles, California to Vancouver, B.C..  
8 The complainant was concerned that his mother would not be allowed to enter the country at the  
9 border crossing in Blaine, Washington. Because his mother is 75 years old, he is planning on a  
10 long term stay in Vancouver if she is not allowed entry. However, he has a young son and  
11 family that he would be separated from during that time and employment that will not  
12 accommodate long-term telecommuting.

13 12. We were contacted by an Iraqi refugee who has lived in Washington State for two  
14 years. When President Trump signed the Executive Order she was distraught because she had  
15 planned to travel in March to visit her fiancé—who she has not seen in over two years. Even  
16 though her trip was planned a long time ago, she is now concerned that she may not be able to  
17 reenter the country if she goes to see him.


18 13. An Iranian woman contacted us because she was expecting a visit from her  
19 mother in three weeks. The process of getting a visa for her mother who lives in Iran was long  
20 and arduous. It took six months to get an appointment with the embassy. Her appointment was  
21 in August and she finally received her visa in early January. The complainant was excited to  
22 have her mother visit her in Washington State—a visit that will no longer be possible because of  
23 the Executive Order. She was also planning to visit her elderly grandmother in Iran this summer

1 but now she is afraid to leave the country out of fear that, even though she is a lawful permanent  
2 resident, she might not be allowed reentry.

3 14. On January 28, 2017, the ACLU of Washington with the Northwest Immigrant  
4 Rights Project filed an emergency Writ of Habeas Corpus for the release of two individuals who  
5 were detained at the Seattle-Tacoma International Airport. Judge Thomas Zilly ordered their  
6 immediate release. Exhibit A.

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

9 EXECUTED on 30th day of January, 2017.

10   
11 Emily Chiang, WSBA No. 50517  
12 ACLU of Washington Foundation  
13 901 Fifth Avenue, Suite 630  
14 Seattle, Washington 98164  
15 Telephone: 206-624-2184  
16 echiang@aclu-wa.org  
17  
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21  
22  
23

Chiang  
Declaration  
Exhibit A



Matt Adams  
Glenda Aldana Madrid  
NORTHWEST IMMIGRANT RIGHTS PROJECT  
615 Second Ave., Ste. 400  
Seattle, WA 98104  
(206) 957-8611

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

John DOE 1, John DOE 2 )

Petitioners, )

v. )

Case No.: C17-126

Donald TRUMP; President of the United States )

of America; John F. Kelly, Secretary of the )

Department of Homeland Security; )

DEPARTMENT OF HOMELAND SECURITY; )

KEVIN K. MCALEENAN, Acting )

Commissioner of Customs and Border )

Protection; CUSTOMS AND BORDER )

PROTECTION; and the UNITED STATES OF )

AMERICA, )

Respondents. )

**ORDER GRANTING EMERGENCY  
MOTION FOR STAY OF REMOVAL**

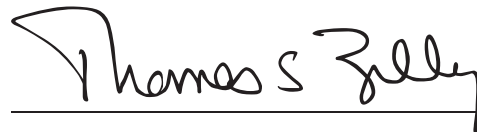
ORDER- 1 -  
Petition for Writ of Habeas Corpus

Northwest Immigrant Rights Project  
615 Second Ave., Ste. 400  
Seattle, WA 98104  
Tel: 206 957-8611

1  
2 THIS MATTER HAVING COME TO THE COURT UPON PETITIONERS'  
3 EMERGENCY ORDER FOR STAY OF REMOVAL, AND THE COURT HAVING  
4 CONSIDERED THE EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS,  
5 DOCKET NO. 1, AND THE MOTION FOR EMERGENCY STAY, DOCKET NO. 2,  
6  
7 HEREBY GRANTS THE FOLLOWING ORDER:

- 8  
9 1. THE COURTS GRANTS A STAY OF REMOVAL.  
10  
11 2. DEFENDANTS ARE ENJOINED FROM REMOVING JOHN DOE I AND  
12 JOHN DOE II FROM THE UNITED STATES PENDING FURTHER ORDER  
13 OF THE COURT.  
14  
15 3. The Court SETS a hearing for 10:00 a.m. on Friday, February 3, 2017, to  
16 determine whether to lift the stay.

17 DATED this 28th day of January, 2017.

18  
19 

20 Thomas S. Zilly  
21 United States District Judge  
22