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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

CASE NO. C17-0141JLR

DECLARATION OF DENNIS GALVAN

I, Dennis Galvan, hereby declare and affirm as follows:

1. I am over the age of eighteen and competent to testify.

2. I am employed by the University of Oregon ("U of O") and serve as Vice Provost for International Affairs, and Professor in the Political Science and International Studies Departments. I am also the Executive Director of the Global Studies Institute, which promotes international research, teaching, and outreach at the University of Oregon. I have conducted research on international development for 29 years in two majority-Muslim, pro-Western countries (Senegal, the most institutionally democratic society in Africa, and Indonesia, the largest Muslim population society in the world). My research involves ethnographic analysis of grass-roots responses to attempts to export and replicate Western-style modernization, free markets, democracy, human rights and nation-building in these predominantly Muslim societies. I have published widely on this topic; served as Fulbright Fellow in Senegal 2009-10; obtained research grants from the National Science Foundation, Social Science Research Council, US Department of Education; and have consulted with the US State Department and US Agency for

DECLARATION OF DENNIS GALVAN - 1

OREGON DEPARTMENT OF JUSTICE 1162 Court Street Salem, OR 97301 Telephone: (503) 378-4400 Fax: (503) 947-4793

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International Development. Since 2011 I have managed study abroad, international student services, international research centers, international partnerships and contributed directly to international fundraising for the University of Oregon. I have personal knowledge of the facts set forth in this declaration and I am competent to testify about them.

- 3. The University of Oregon is a public research university whose mission statement includes U of O's "devotion to educating the whole person, and fostering the next generation of transformational leaders and informed participants in the global community."
- The University of Oregon has a current enrollment of approximately 23,634 students, with 13%, or approximately 3,016, international students.
- In addition to a sizeable international student population, the University of Oregon has 205 visiting international scholars and approximately 120 international faculty members; representing approximately 8% of the faculty body.
- 6. I am familiar with the Executive Order entitled "Protecting the Nation from Foreign Terrorist Entry into the United States," which I understand would temporarily bar any person entering the United States who is a citizen of any of the following seven countries: Syria, Iraq, Iran, Somalia, Sudan, Libya, and Yemen ("the affected countries").
- 7. Of the 3,016 international students at the U of O, 38 students are citizens of the affected countries. These 38 students are here under valid student visas. Additionally, the U of O has one faculty and staff from the affected countries. My office has advised students, faculty, and staff from the affected countries that if they leave the United States, they may not be able to return. The fact that the Executive Order did not strand a University of Oregon community member overseas was the result of fortunate chance.
 - International students typically pay full, out-of-state tuition rates and those 3,016 international students represent approximately \$100,860,318/year in tuition revenue to the University of Oregon. The out-of-state tuition paid by out-of-state students, including

international students, helps to subsidize the discounted rate of tuition paid by in-statestudents. Out-of-state tuition is approximately three times higher than in-state tuition. Without the out-of-state tuition, the cost of tuition for Oregon students would increase. That increase would either be borne by in-state-students or would need to be funded by the tax dollars of the citizens of Oregon.

9. More importantly, global engagement is critical to the U of O's pursuit of academic excellence. We are committed to preparing all our students for success and leadership in multicultural work environments and in a global economy. Our international students are critical to that preparation. They add significantly to the cultural, religious, ethnic and racial diversity of our campus. They bring new perspectives to our debates and fresh ideas to our labs, dorms, and campus culture. While we send 25% of our students on study abroad (highest percentage in Oregon, higher than average for public universities in the American Association of Universities, 23%), many cannot afford to go. Contact with international students right here on campus guarantees every UO student exposure to diverse world views and global perspectives. We are thus committed to bringing the best and the brightest to our undergraduate and graduate programs, which entails recruitment from all corners of the globe. No major research university can cut itself off from the rest of the world if it wishes to remain competitive in pursuing grants, publications, and the development of cutting edge knowledge. I am concerned that if enforced the Executive Order will have a chilling effect on our admissions from many parts of the world, and encourage top doctoral, master's and undergraduate students to avoid what appears to be an isolationist, unwelcoming country, and to turn instead to higher education options in Canada, Australia, New Zealand, and Europe.

10. Some 450 UO faculty self-identify as engaged in international research of various kinds. Faculty whose empirical domain of study lies in the seven countries impacted, or in the Muslim world, may be cut off from the ability to gather data. This impacts approximately 20 UO faculty. Faculty who are from the seven countries, or from a

majority Muslim country, fear for their ability to travel outside the US for research, conferences/symposia, and for research collaboration, which negatively impacts their careers. We have data from Elsevier Inc. (major academic publisher) and the Association of Pacific Rim Universities, showing a strong positive correlation between research citation rates and international co-authorship -- the more our faculty research and publish with international colleagues, the higher their citations rates and therefor the greater the impact of their work. A chill in international collaboration will curtail our global science, and undermine the UO's ongoing efforts to remain in the top tier of American public research universities.

11. Graduate Admissions at the University of Oregon are most immediately impacted by the Executive Order. We are already making admissions offers to top graduate (doctoral and masters), candidates, some of whom are from the countries affected by the ban. Needless to say, persons from the affected countries will not be able to accept our offers if they cannot come into the United States. We have further heard that other graduate students we'd like to recruit from beyond the seven countries, such as from East Asia, are already signaling interest in non-US alternatives. Closing the door to the world's best and brightest hinders our ability to accelerate the flow of innovation from lab/think tank to market and workplace.

12. Undergraduate admissions will also be affected, with significant financial implications. Our Admissions Department is already seeing a 15% decrease in applications from international students across the globe, which I believe reflects the chilling effect of the Executive Order on international interest in US higher education. Higher education today is an international business in which universities are competing in the global market place for the best and the brightest. The Executive Order decreases the ability of universities, such as the University of Oregon, to effectively compete in that marketplace and detracts from the U of O's reputation both at home and abroad. In addition, in the last five years, the University of Oregon has raised \$12.3 million in private donations from

international alumni and international friends of the university. In the last five years, the UO also has received \$13.1 million in grants and contracts for international research and outreach projects. If international collaboration is diminished by the Executive Order, we expect reductions in international grants, contracts and donations in the years ahead.

13. The University of Oregon's administration is using limited resources to field inquiries about the impact the Executive Order will have, and already is having, on faculty, staff, and student travel. Faculty, staff and students from majority Muslim countries face considerable uncertainty that their societies may be targeted for an expended ban on immigration, and this spreads the chilling effect across our community.

14. Three areas where the Executive Order impact is already being felt is in travel by faculty to international conferences, the University of Oregon's ability to host international events, and the ability of University of Oregon community members to return to their home country for family emergencies.

15. Upcoming travel by a U of O faculty member was called into question by the issuance of the Executive Order. In particular, a math faculty member was invited to present at a conference in Canada. The faculty member has a Canadian passport, but the passport also indicates she was born in one of the seven affected countries. The faculty member's ability to travel without detainment, even to a country for which she holds a valid passport, and to return to a country for which she has a valid visa, is less than certain. As a result, the faculty member and the U of O are weighing the risk of the faculty member attending the conference and engaging in the important work of her field.

16. The University of Oregon is also feeling the effects of the Executive Order in its own hosting of two upcoming international conferences. Presently, the U of O is scheduled to host a conference on sustainable cities and land use in Portland in the fall of 2017. The conference is held in conjunction with the 45 partner members of the Association of Pacific Rim Universities, of which the University of Oregon is the only Oregon member institution. Fellow member universities from around the Pacific Rim are expressing

concern about attending, asking if it is safe to come, and indicating they are uncertain whether they will participate. The same is true for a second conference, also to be hosted at UO in fall 2017, by the new Dean of School of Architecture and Allied Arts on design innovation and urban futures. Hoped-for attendees to this conference have signaled their unwillingness to travel to the US. Loss of participation in these conference will result in decreased revenue for the U of O and the state of Oregon, and will hinder the important work of the U of O with its member universities.

17. Finally, members of the University of Oregon community are struggling with the Hobbesian choice of whether to travel to a sick family member or forfeit their education or employment. I make this statement as I understand there are both an Iranian Ph.D. student and a staff member of the University of Oregon who are facing the difficult decision of whether to leave the country and their studies or employment, without the ability to return, in order to be with a sick - and perhaps dying - family member.

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

Executed this 14th day of February, 2017

s/Dennis Galvan Vice Provost for International Affairs