

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

IRANIAN ALLIANCES ACROSS BORDERS;
et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; et al.

Defendants.

Civil Action No.: 17-CV-2921
Judge Chuang

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Plaintiffs hereby move for a preliminary injunction as set forth below and for the reasons set forth in the accompanying Memorandum of Law in Support of Plaintiffs' Motion for a Preliminary Injunction and supporting exhibits,¹ and the Memorandum of Law in Support of Plaintiffs' Motion for a Preliminary Injunction filed today, October 6, 2017, in *Int'l Refugee Assist. Project v. Trump*, No. 8:17-cv-00361 (collectively, the "Memoranda"). Fed. R. Civ. P. 65. Plaintiffs seek to restrain and enjoin Defendants from enforcing or implementing the proclamation entitled "Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry Into the United States by Terrorists or Other Public-Safety Threats" (the "Proclamation"). As demonstrated in the Memoranda, the Proclamation and Defendants' implementation of it violate the Immigration and Nationality Act and its implementing regulations and the First and Fifth Amendments to the U.S. Constitution.

¹ Certain exhibits are redacted to protect the identity of Doe Plaintiffs who filed a Motion for Permission to Proceed under Pseudonyms. ECF No. 6 (filed Oct. 3, 2017).

For the foregoing reasons, Plaintiffs respectfully request that this Court grant their Motion for a Preliminary Injunction.

A proposed Order is attached.

Dated: October 6, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on October 6, 2017, a copy of the foregoing document and its attachments was served on counsel for Defendants, via CM/ECF.

/s/
Mark H. Lynch (Bar # 12560)

UNITED STATES DISTRICT COURT
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Defendants.

Civil Action No. 17-CV-2921
Judge Chuang

ORDER

Upon full consideration of Plaintiffs' Motion for a Preliminary Injunction and Memorandum in Support of Plaintiffs' Motion for a Preliminary Injunction, it is hereby ORDERED that said Motion is GRANTED. Defendants are enjoined from:

- a. Enforcing the "Presidential Proclamation Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry Into the United States by Terrorists or Other Public-Safety Threats" (the "Proclamation");
- b. Applying the Proclamation to deny, revoke, restrict, cancel, or delay issuance of any immigrant or nonimmigrant visa;
- c. Applying the Proclamation to deny or suspend entry or admission of any person;
- d. Applying the Proclamation to prohibit any person from applying for or receiving any benefit under the Immigration and Nationality Act.

So Ordered.

Signed this ____ day of _____, 2017.

Judge Theodore D. Chuang

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DONALD J. TRUMP, in his official capacity as
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Defendants.

Civil Action No.: 17-CV-2921
Judge Chuang

**MEMORANDUM OF LAW IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs respectfully request a preliminary injunction preventing Defendants from implementing or enforcing the presidential proclamation entitled “Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry Into the United States by Terrorists or Other Public-Safety Threats” (the “Proclamation”). For the reasons stated in the memorandum in support of the motion for a preliminary injunction filed today, October 6, 2017, in *Int’l Refugee Assist. Project v. Trump*, No. 8:17-cv-00361, Plaintiffs are likely to succeed on the merits of their claims, and the balance of equities and public interest favor an injunction. For the reasons stated below, Plaintiffs have standing to bring their claims and will suffer irreparable harm without an injunction.

FACTUAL BACKGROUND

Plaintiffs are a national nonprofit organization with significant operations in Maryland and six Maryland residents. They will suffer substantial and irreparable harm if the Proclamation is not enjoined.

1. Iranian Alliances Across Borders (“IAAB”) is a national organization whose mission is to strengthen the Iranian diaspora community through leadership and educational programming that encourages collaboration and solidarity across borders and between communities. Declaration of Mana Kharrazi ¶¶ 2, 4 (attached hereto as Exhibit 1). IAAB organizes camps for youths, regional summits, Persian-language educational events, international conferences on the Iranian diaspora, and other activities. *Id.* ¶¶ 9-17. IAAB invites prominent scholars and other participants from outside the country, including from Iran, to the United States for these events. *Id.* ¶ 18.

As a result of the President’s travel bans, IAAB has devoted substantial time supporting its members who have been “subjected to hate speech and intimidation in public places.” *Id.* ¶ 7. The travel bans also have harmed IAAB by causing a reduction in applications for IAAB’s

summer camps from people residing abroad. *Id.* ¶ 9. If the Proclamation is not enjoined, it will significantly interfere with IAAB’s ability to attract foreign visitors to its events. *Id.* ¶ 21. IAAB will hold an International Conference on the Iranian Diaspora in April 2018, which will include “scholars, students, journalists, artists, community leaders and other interested people” discussing “issues facing the Iranian diaspora community.” *Id.* ¶ 17. Unless the Proclamation is enjoined, Iranian nationals will be unable to attend the conference. *Id.* ¶ 21.

2. Jane Doe #1 is a United States citizen who came to the U.S. in 2001 as a refugee, fleeing religious persecution in Iran. Declaration of Jane Doe #1 ¶¶ 2-3 (attached hereto as Exhibit 2). Until recently, she lived in Bethesda, Maryland. *Id.* ¶ 7. She has relocated to the United Arab Emirates on a temporary basis, because her husband currently lives there and does not currently have permission to reside in the United States. *Id.* ¶ 6. In June 2016, she submitted an I-130 immigration form for her husband, and the request was approved on September 20, 2017. *Id.* He is now waiting for his interview, which would typically occur within a few months. *Id.* If the Proclamation is not enjoined, his visa will be suspended, and Jane Doe #1 and her husband will be indefinitely prevented from building their life together in Maryland as they had hoped. *Id.* ¶ 8. Their residency status in the United Arab Emirates is uncertain; they can never receive permanent residency and must continue to reapply for temporary residency every three years. *Id.* ¶ 9. They would face persecution if forced to return to Iran. *Id.* ¶ 10.

3. Jane Doe #2 is a U.S. citizen of Iranian origin who has lived her entire life in Maryland. Declaration of Jane Doe #2 ¶ 2 (attached hereto as Exhibit 3). She is a recent graduate of the University of Maryland, College Park, and continues to live and work in Maryland. *Id.* ¶¶ 3-4. In February 2017, she applied for a K-1 visa for her fiancé who lives in Iran, and he completed his interview at the U.S. Embassy in Turkey on August 4, 2017. *Id.* ¶¶ 5-6. If the

Proclamation takes effect before the visa application is granted, Jane Doe #2 and her fiancé will not be able to live together in the United States. She will “have to choose between [her] home and [her] country here in Maryland and the love of [her] life, the man [she] want[s] to marry.” *Id.* ¶ 7.

4. Jane Doe #3 is a U.S. citizen of Iranian origin who lives in Potomac, Maryland. Declaration of Jane Doe #3 ¶¶ 2, 4 (attached hereto as Exhibit 4). She came to the United States as a student in 1995 and became a citizen in 2004. *Id.* ¶ 3. She has a Master’s Degree in Education from the George Washington University, and has been a special-education teacher for Montgomery County Public Schools since 2006. *Id.* ¶ 5. Her mother and oldest brother also immigrated and have become U.S. citizens, and her father is a Lawful Permanent Resident. *Id.* ¶ 6. Her youngest brother is the only family member remaining in Iran. *Id.* ¶ 7. Jane Doe #3 has an approved I-130 application for him to come to the United States, and he is waiting for an interview, which should be scheduled soon. *Id.* ¶ 7. If the Proclamation is not enjoined, processing of her petition will be suspended and she will be indefinitely prevented from reuniting here with her brother.

5. Jane Doe #5 is a 79-year-old Iranian national and Lawful Permanent Resident of the United States, who resides in Maryland. Declaration of Jane Doe #5 ¶¶ 2-3, 6 (attached hereto as Exhibit 5). She and her 90-year-old husband moved to the United States in 2010 to join their son, who became a U.S. citizen in 2009. *Id.* ¶¶ 2-3, 6. Her other son remains in Iran. *Id.* ¶ 4. His I-130 application has been approved, and he is now awaiting final approval to come to the United States. *Id.* ¶¶ 4-5. Jane Doe #5 is wheelchair-bound and her husband also has significant health problems. *Id.* ¶ 6. Given her age and health problems, the Proclamation has caused her to be “extremely anxious, sad, and worried” that she “will never be able to see [her] son.” *Id.* ¶ 7.

6. John Doe #6 is an Iranian national and a Lawful Permanent Resident of the United States, who has lived in the United States for five years and works as an engineer. Declaration of John Doe #6 ¶¶ 2-3 (attached hereto as Exhibit 6). His wife is also Iranian; she works as a biochemistry researcher at the National Institutes of Health. *Id.* ¶ 2. They have together made their home in Maryland. *Id.* ¶ 3. John Doe #6 and his wife came to the United States to contribute their professional skills to their new home, but now they feel “targeted and threatened” by the Proclamation’s “hostility to Iranians generally and to Muslims in particular.” *Id.* ¶¶ 7, 9. His mother-in-law and sister-in-law have applied for tourist visas to visit them, and both had their interviews at the U.S. Embassy in Dubai on January 5, 2017. *Id.* ¶ 5. If their visas are not issued before the Proclamation takes effect, John Doe #6 and his wife will indefinitely be separated from some of their closest and dearest family members.

ARGUMENT

I. Plaintiffs Have Standing To Assert Their Claims.

A plaintiff has standing if three requirements are met: (1) she has “suffered injury in fact”; (2) the injury is “fairly traceable to the defendants’ actions”; and (3) the injury is “likely” to be redressed by a favorable decision.” *Int’l Refugee Assist. Project v. Trump*, 857 F.3d 554, 581 (4th Cir. 2017) (“*IRAP II*”). A claim is justiciable so long as one plaintiff establishes standing to bring it. *See Int’l Refugee Assist. Project v. Trump*, 241 F. Supp. 3d 539, 549 (D. Md. 2017) (“*IRAP I*”). Plaintiffs have standing to bring each of their claims.

Injury in fact. Plaintiffs will suffer injury-in-fact unless the Proclamation is enjoined. The Doe Plaintiffs will be injured because the Proclamation will indefinitely delay the issuance of visas to their loved ones, and could make it impossible for them to get visas. For example, Jane Doe #1 has an application pending for her husband to come to the United States, Jane Doe #2 has an application pending for her fiancé, Jane Doe #3 has an application pending for her

brother, Jane Doe #5 has an application pending for her son, and John Doe #6's mother-in-law and sister-in-law have pending applications for visitor visas. *See pp. 1-4 supra*. The Proclamation would prevent all of these applications from being granted.

These delays in issuing visas satisfy the injury-in-fact requirement. In *IRAP II*, the Fourth Circuit held that Doe #1 in that litigation had established injury-in-fact because the challenged executive order ("EO-2") would "bar his wife's entry into the United States and prolong their separation." *IRAP II*, 857 F.3d 554 at 583. The government did not challenge that "prolonged separation of family members can constitute an injury-in-fact," but instead argued that the injury was not imminent. *Id.* Rejecting that argument, the Fourth Circuit found "a 'real and immediate' threat that [EO-2] would prolong Doe #1's separation from his wife, either by delaying the issuance of her visa or denying her visa and forcing her to restart the application process." *Id.* at 584 (citation omitted). The Ninth Circuit reached the same conclusion in *Hawaii v. Trump*, holding that the plaintiff had standing because EO-2 created "a barrier to reunification with [plaintiff's] mother-in-law in light of her stalled visa process." 859 F.3d 741, 763 (9th Cir. 2017); *see also IRAP I*, 241 F. Supp. 3d at 549 (plaintiffs asserted sufficient injury because "the delay or denial of the issuance of visas will cause injury in the form of continued separation from their family members").¹

Plaintiffs also suffer injury-in-fact because the Proclamation sends the message that Muslims "are outsiders, not full members of the political community." *IRAP II*, 857 F.3d at 582

¹ Plaintiffs similarly have standing to bring an equal protection claim because they allege that the Proclamation denies them the same opportunity as non-Muslims to seek visas for their relatives. *See, e.g., Ne. Fla. Chapter of Associated Gen. Contractors of Am. v. City of Jacksonville*, 508 U.S. 656, 666 (1993) ("The 'injury in fact' in an equal protection case of this variety is the denial of equal treatment resulting from the imposition of the barrier, not the ultimate inability to obtain the benefit.").

(quotation marks and citation omitted). As John Doe #6 explains, “I feel personally attacked, targeted, and disparaged by this new Proclamation, which shows hostility to Iranians generally and to Muslims in particular. . . . And it makes me fear for my safety and the safety of my wife, my loved ones, and my community.” John Doe #6 Decl. ¶ 9. Other plaintiffs feel the same way. *See, e.g.*, Jane Doe #2 Decl. ¶ 9 (“I feel dismayed and fearful that my country is enacting official policies that discriminate against me and make me feel that I do not belong here.”).

The Fourth Circuit held that this injury is sufficient to establish standing. As the court of appeals explained: “Feelings of marginalization and exclusion are cognizable forms of injury.” *IRAP II*, 857 F.3d at 582 (quoting *Moss v. Spartanburg Cty. Sch. Dist. Seven*, 683 F.3d 599, 607 (4th Cir. 2012)). That is because “one of the core objectives of modern Establishment Clause jurisprudence has been to prevent the State from sending a message to non-adherents of a particular religion ‘that they are *outsiders*, not full members of the political community.’” *Id.* (quoting *Moss*, 683 F.3d at 607). In *IRAP II*, Doe #1 explained how EO-2 had “caused him to fear for his personal safety in this country and wonder whether he should give up his career in the United States and return to Iran to be with his wife.” *Id.* at 584-85. The Fourth Circuit held that this evidence was sufficient to establish standing because it was “consistent with the ‘[f]eelings of marginalization and exclusion’ injury [the court] recognized in *Moss*, 683 F.3d at 607.” *Id.* at 585.

IAAB will also suffer injury-in-fact if the Proclamation is not enjoined. IAAB has had to “devote significant time responding to members of our community who were subjected to hate speech and intimidation in public places, and/or were otherwise distressed and stigmatized by” the President’s travel bans. Kharrazi Decl. ¶ 7. The Proclamation will also interfere with IAAB’s ability to put on its conferences. As IAAB explains, “At prior conferences, about half of

the invited speakers come from outside the United States, including from Iran. They often bring other members of their organizations or faculty.” *Id.* ¶ 18. And “there is always an international presence that includes attendees from outside the United States, including Iran.” *Id.* ¶ 19. The Proclamation will also hurt IAAB’s summer camps, which attract visitors from overseas. *Id.* ¶ 9. The Proclamation would prevent many of these people from coming to the United States, thereby injuring IAAB by reducing attendance at events for which it invests significant resources to organize and promote. See *Hawaii*, 859 F.3d at 783 (state is injured by EO-2’s “constraints to recruiting and attracting students and faculty members to the University of Hawai‘i”).

Traceability and Redressability. The remaining requirements for standing are easily satisfied. Plaintiffs’ injuries can be directly traced to the Proclamation. Enjoining the Proclamation would allow the Doe Plaintiffs’ relatives to have their visa applications processed and IAAB to invite speakers and attendees from Iran and other countries to its events. These requirements were not seriously disputed in the EO-2 litigation, and they should not be disputed here. As the Ninth Circuit explained, “While not challenged by the Government, it is also clear that [plaintiff] has established causation and redressability. His injuries are fairly traceable to the Order, satisfying causation, and enjoining EO2 will remove a barrier to reunification and redress that injury, satisfying redressability.” *Hawaii*, 859 F.3d at 763. The same is true here.

II. Plaintiffs Will Suffer Irreparable Harm Absent Injunctive Relief.

Plaintiffs face irreparable harm from the Proclamation. In *Hawaii*, the Ninth Circuit held that there was irreparable harm based on, among other things, “prolonged separation from family members” and “constraints to recruiting.” 859 F.3d at 782. These harms are irreparable because they “are not compensable with monetary damages.” *Id.* at 782-83.

Plaintiffs suffer similar irreparable injuries. As in *Hawaii*, the Doe Plaintiffs face prolonged separation from their family and loved ones. Jane Doe #1 will be forced to choose

between living without her husband in the United States and living with him in a foreign country where they could be expelled for any reason. Jane Doe #1 Decl. ¶ 13. Jane Doe #2 must similarly “choose between my home and my country here in Maryland and the love of my life, the man I want to marry.” Jane Doe #2 Decl. ¶ 7. Jane Doe #3 may never see her youngest brother again. Jane Doe #5, an elderly woman in poor health, may never see her son again. John Doe #5 Decl. ¶¶ 6-7. And John Doe #6 and his wife may never see his wife’s mother and sister again. John Doe #6 Decl. ¶ 6. These injuries are more than sufficient to establish irreparable harm. Indeed, the harm here is substantially worse than in *Hawaii*. The Executive Orders were set to expire within a few months, but the Proclamation has no expiration date, and so the Doe Plaintiffs will be separated from family members indefinitely.

Like the State in *Hawaii*, IAAB faces difficulties in “recruiting and attracting” people to its events. 859 F.3d at 782. The Proclamation will interfere with IAAB’s ability to attract leading scholars from Iran and other affected countries to its International Conference on the Iranian Diaspora. It will also hurt IAAB’s summer camps, which attract visitors from countries subject to the Proclamation.

Even without this evidence of concrete harms that will flow from the Proclamation, Plaintiffs could demonstrate irreparable harm based on their likelihood of success on their Establishment Clause claim. As the Fourth Circuit explained, “in the context of an alleged violation of First Amendment rights, a plaintiff’s claimed irreparable harm is inseparably linked to the likelihood of success on the merits.” *IRAP II*, 857 F.3d at 601 (quotation marks and citation omitted). That is because “loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Id.* at 602 (quoting *Elrod v. Burns*, 427 U.S. 347, 373 (1976) (plurality opinion)). “[B]ecause of the inchoate, one-way nature of Establishment Clause

violations, they create the same type of immediate, irreparable injury as do other types of First Amendment violations.” *Id.* (quotation marks and citation omitted). Plaintiffs thus suffer irreparable harm solely based on the violations of their rights under the Establishment Clause.

CONCLUSION

For the foregoing reasons and the reasons stated in the *IRAP* Plaintiffs’ memorandum of law, Plaintiffs’ motion for a preliminary injunction should be granted.

Dated: October 6, 2017

Respectfully submitted,

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** *Pro hac vice* application forthcoming.

[^] Admitted only in New York; supervised by Richard B. Katskee, a member of the D.C. Bar.

Exhibit 1

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
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IRANIAN ALLIANCES ACROSS BORDERS;
et al.

Plaintiffs,

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Defendants.

Case No. 17-cv-02921-TDC

**DECLARATION OF MANA KHARRAZI ON BEHALF OF IRANIAN ALLIANCES
ACROSS BORDERS**

Pursuant to 28 U.S.C. § 1746, I, Mana Kharrazi, hereby declare and state as follows:

1. I am over the age of eighteen years. I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon personal information provided to me by others, and I am competent to testify thereto.

2. I am the Executive Director of Iranian Alliances Across Borders. IAAB is a 501(c)(3) nonprofit corporation organized under the laws of the state of New York. I have been the Executive Director at IAAB since 2008. Prior to that, beginning in 2006, I served as a program associate and program director. Before that, I participated in IAAB programs as a student.

3. Because of my position as Executive Director, and my prior involvement with the organization, I know the history and background of IAAB as well as the organization's mission, purposes, and activities. I am also involved in the day-to-day operation of IAAB and am therefore familiar with the organization's current expenses, revenues, and resources. I oversee

programs and activities sponsored or arranged by IAAB and am involved with publications that IAAB distributes.

4. The mission of IAAB is to strengthen the Iranian diaspora community through leadership and educational programming that encourages collaboration and solidarity across various borders and multiple communities. IAAB is a diverse organization, open to members of all religious faiths.

5. I am the only paid staff member of IAAB. Along with myself, our work is done by approximately 50-60 unpaid volunteers each year. We host IAAB's Campus Action Network, a national network comprised of affiliated Iranian-American student groups and representatives, including groups at the University of Maryland College Park, one of the biggest and most active Iranian-American student groups in the nation, and the University of Maryland in Baltimore.

6. We maintain a mailing list of over 2000 individuals, for distribution of our monthly newsletter, and other communications.

7. The travel bans issued in the past year, and the anti-Muslim rhetoric during the campaign, resulted in our organization having to devote significant time responding to members of our community who were subjected to hate speech and intimidation in public places, and/or were otherwise distressed and stigmatized by these events. In response to these reports, we launched the "Reject Hate" campaign to help our members respond to and address targeting and harassment. We worked with parents in our community to provide toolkits for the schools their children attend, presenting positive images of Muslims, Middle Easterners, and South Asians and otherwise guiding parents and educators about how to deal with discriminatory and hateful behavior.

8. The travel bans also affected our educational programs, and the new version of the ban issued on September 24, 2017, excluding, without any time limitation, all Iranian nationals from immigrating to the United States, and most Iranian nationals from traveling to the United States, is likely to affect those programs in the future.

9. Our programs include overnight camps for high school students (Camp Ayandeh, begun in 2006), and middle school students (Camp Javan, begun in 2012). Although primarily attended by Iranian Americans, we have also had campers from Iran and Europe. Since 2010, Camp Ayandeh has hosted campers from outside the United States every year, until the Summer of 2017—the first year that the United States ordered a ban on travel by Iranian nationals. Two applicants to IAAB’s camps from overseas dropped out after the travel ban was ordered.

10. The camps are run by volunteer counselors. There have been counselors from overseas every year until the Summer of 2017. One counselor from Germany, with Iranian roots, worked at the camp in 2016, but did not come back in 2017.

11. At our camps, our workshops address social and cultural issues that challenge all young people, and those that arise from their membership in the Iranian diaspora community. These efforts are described in the recently published book “The Limits of Whiteness: Iranian Americans and the Everyday Politics of Race” by Neda Maghbouleh.

12. In the Summer of 2017, we spent a considerable amount of time at our camps addressing our campers’ feelings of fear, self-hate, and lowered self-esteem arising specifically from the statements made about Muslims and Iranians made during the election, and the imposition of travel bans on Iranians and nationals of other predominantly Muslim countries.

13. Our youth shared stories of feeling discriminated against and described negative experiences in their schools. I led a session about the current climate, including the travel ban

and the representation of our communities in the media. I supported youth who described personal stories about being called a ‘terrorist’ and having to respond about their identities. I supported young teenage boys with traumatic experiences of being subjected to ridicule and harassment on sports teams, by parents of friends, classmates, and teachers. Some youth described feeling unsafe in their communities, sometimes saying they did not want their classmates to know that they are Iranian American. Some shared stories about being harassed for their facial hair, being mocked for their names, not feeling a sense of self-love because their Iranian identity subjected them to being treated differently. I also supported a young group of volunteer counselors who shared similar experiences in college

14. We maintain ongoing relationships with the young people who attend our camps, and their families. Those relationships continue into college, where our camp alumni often become leaders and participants in Iranian-American student groups. Participants in these IAAB activities and relationships consider each other to be family.

15. We created a national Campus Action Network of college and university Iranian-American student groups, known as I-CAN. Through those affiliations, we share resources and ideas, collaborate on various events and actions, provide leadership training, and collaborate on programs. Most years we hold an IAAB Student Summit for I-CAN leaders and other interested participants. We are in the process of scheduling that event for the 2017-18 academic year.

16. Like our middle school and high school students, the college and university students that we interact with have experienced sufficient distress and fear as a result of the election rhetoric and the travel bans. Our organization is spending significant time discussing and planning with these student groups how to respond to these disturbing developments.

17. IAAB periodically holds an International Conference on the Iranian Diaspora where scholars, students, journalists, artists, community leaders and other interested people present papers, participate in panels, and otherwise address issues affecting the Iranian Diaspora community globally. The next conference will take place in on April 21 and 22 at New York University. We are sending out our call for proposals in the coming week or two. If the Proclamation goes into effect, potential participants will significantly be discouraged from applying, and participants who do apply would not be able to obtain visas to attend.

18. At prior conferences, about half the invited speakers come from outside the United States, including from Iran. They often bring other members of their organizations or faculty.

19. At prior conferences, there is always an international presence that includes attendees from outside the United States, including Iran.

20. At prior conferences, we have hosted performers with Iranian national origins from outside the country, including the Iranian rock band, Hypernova.

21. The conference requires substantial advance planning, fundraising, and promotion. We raise money to support travel, and pay honorarium for invited speakers. We assist speakers and other participants with the visa process, providing them any documentation they need to submit their application. Addressing whether the ban applies to individuals outside the country who we wish to invite, or who wish to participate in the conference will require organization resources, and likely require guidance that we do not have the internal capacity to provide. We anticipate that potentially affected individuals will be discouraged from attempting to come to the United States for the conference, in light of the challenges and uncertainty associated.

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

Executed on October 5, 2017.



Mana Kharrazi

Exhibit 2

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

IRANIAN ALLIANCES ACROSS BORDERS;
et al.

Plaintiffs,

v.

Case No. 17-cv-02921-TDC

DONALD J. TRUMP, in his official capacity as
President of the United States; *et al.*

Defendants.

DECLARATION OF JANE DOE #1

Pursuant to 28 U.S.C. § 1746, I, [REDACTED], known for the purpose of this case as Jane Doe #1, hereby declare and state as follows:

1. I am over the age of eighteen years, and I make this declaration based on my own personal knowledge. If asked to do so, I could testify truthfully about the matters contained herein.
2. I am a United States citizen. My spouse and I live in the United Arab Emirates ("UAE").
3. I came to the United States in 2011 as a refugee fleeing persecution in Iran because of my membership in the Baha'i faith, which is outlawed in Iran.
4. I met my husband in March 2014 through my friendship with his aunt, initially over Skype, and began to pursue a long-distance relationship. He was living in the UAE, where he ran and continues to run his own IT company. We pursued our long-distance relationship and, beginning in 2016, we met in person and I spent significant time with him in UAE. We got

married on February 28, 2016. I continued to go back and forth between the United States and the UAE for the next several months.

5. I became a United States Citizen in January 2017.

6. Shortly after that, I moved to be with my husband in UAE while we await the processing of his application for immigration to the United States. I submitted an I-130 application for him in June 2016. It was approved on September 20, 2017. He is now awaiting his interview, which in the ordinary course would be scheduled in the next few months.

7. Before I came to the UAE to join my husband, I lived in Bethesda, Maryland at [REDACTED].

8. I want to return to the United States with my husband so that we can live in this area of Maryland again. Before leaving for UAE, I was searching for houses in Maryland so that my husband and I could live there together. I only left the United States so that I could be with my husband while his application is being processed, because I love him and do not want to be apart from him. But the United States is my home and I eagerly await the time that we can return together. The only thing standing between me and my return is the processing of my husband's immigration application.

9. My status in the UAE is temporary and uncertain. My residency there depends on my husband's residency. His residency has to be renewed every 3 years, and is contingent on a renewal of his company's license, which must be renewed each year. The UAE government has the discretion to deny each of these applications for any reason whatsoever. There are restrictions on all aspects of our lives—even down to our ability to open bank accounts. Even if they do continue to renew my husband's residency, there is still no guarantee that they will renew mine. I

do not want to be separated from my husband and am eagerly awaiting the time that we can both return to the United States together.

10. I also understand from friends and other Iranians here that the government of the UAE has become reluctant to renew or issue visas to Iranians, and is attempting to push us out gradually. If my husband is deported to Iran, his life will be at risk. I myself cannot return to Iran, as I fled the country as a refugee. And now that my husband is associated with me and my Baha'i religion, he will be at risk there also.

11. My husband is the sole breadwinner for our family. While he was a bachelor, remaining in this uncertain status in the UAE was easier; but now we are a family and he has greater responsibilities, and the uncertainty of our situation makes him very worried.

12. For all these reasons, we are eagerly awaiting completion of his immigrant visa process, so that we can breathe more easily and come to the United States, where we can settle freely and comfortably and feel like we really belong somewhere and can remain there in a permanent way. I understand that if the Proclamation goes fully into effect, his interview will not be scheduled and he will not be able to obtain an immigrant visa to come to the United States with me.

13. When I learned about the travel ban for persons from Iran, I became extremely anxious and depressed. I am afraid that I will not be able to return to my country, and am being forced to choose between my husband whom I love and my home, United States, to which I cannot wait to return. Our circumstances in UAE are also not permanent, and not settled. If my husband's immigrant visa application is suspended because of the Ban, we will have to remain in very uncertain circumstances and may be forced to be separated from each other.

14. It is important for me to remain anonymous in this lawsuit. I am afraid of losing my status in UAE if my name get associated with this lawsuit. If my husband is forced to return to Iran, his life will be in danger there. And as a refugee, I cannot return to Iran either, and would face significant persecution if I were to return. We are not safe here and we urgently need to come to the United States.

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

Executed on October 5, 2017.

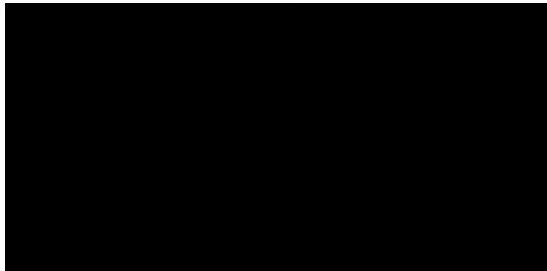


Exhibit 3

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

IRANIAN ALLIANCES ACROSS BORDERS;
et al.

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; *et al.*

Defendants.

Case No. 17-cv-02921-TDC

DECLARATION OF JANE DOE #2

Pursuant to 28 U.S.C. § 1746, I, [REDACTED], known for the purpose of this case as Jane Doe #2, hereby declare and state as follows:

1. I am over the age of eighteen years, and I make this declaration based on my own personal knowledge. If asked to do so, I could testify truthfully about the matters contained herein.

2. I am a US citizen born in the United States in 1994. I have lived in Maryland my entire life.

3. I went to college at the University of Maryland in College Park and graduated in 2017 with a Bachelor's degree in International Business and Marketing and Persian Studies.

4. I currently work as a loan processor at NVR Mortgage, and have had this job for the last two months.

5. About seven years ago, I first met my fiancé on a visit to Iran. We gradually became closer to each other and started a romantic relationship about a year ago. I visited him in Iran, and we maintained a long-distance relationship. With my current job, it is very difficult for

me to get away to go visit him in Iran, and we eagerly await the time that we can fully be together. It is extremely difficult and emotionally draining for us to be apart from each other. I cannot wait until he joins me in the United States and we can get married.

6. In February 2017, I applied for a K visa for my fiancé. The application was received on February 14, which is Valentine's Day. Things moved relatively quickly after that. On August 4, 2017, he had his interview at the U.S. Embassy in Ankara. We provided dozens of pictures, call logs, a letter detailing our relationship, and paperwork covering other aspects of our relationship. We are now awaiting a final response on his application.

7. I understand that if his visa is not issued by October 18, he will be banned from traveling to the United States by the September 24, 2017 Presidential Proclamation. This will mean that I have to choose between my home and my country here in Maryland and the love of my life, the man I want to marry.

8. We have both been distraught since finding out about the ban. If my fiancé's visa is not granted, we will be completely devastated. It will be very difficult for me to leave my job and the only home I have known. This will tear us apart, and we are already devastated just thinking about it.

9. I believe this Proclamation targets me and my loved ones because of religion and national origin, and not because of any legitimate reason. I feel dismayed and fearful that my country is enacting official policies that discriminate against me and make me feel that I do not belong here. Because of this Proclamation targeting me and my community, I feel insecure and I fear for my safety and the safety of my loved ones. I feel that I am being treated as an outsider in my own country.

10. It is important for me to remain anonymous in this lawsuit. I am aware of rising anti-Muslim and anti-Iranian sentiment that has been reinforced by the two previous travel bans and this latest Presidential Proclamation. I fear especially that, because of the indefinite nature of this Proclamation and the statements it makes about Iranians, there will be even more attacks against my community and my loved ones. I am concerned that revealing my identity will invite harassment or targeting. I am also concerned about revealing sensitive information about my fiancé's immigration status and religion, and about retaliation that he might suffer in Iran if his identity is revealed in the course of this litigation.

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

Executed on October 5, 2017.

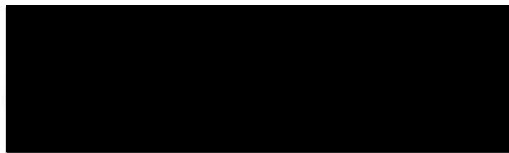


Exhibit 4

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

IRANIAN ALLIANCES ACROSS BORDERS;
et al.

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; *et al.*

Defendants.

Case No. 17-cv-02921-TDC

DECLARATION OF JANE DOE #3

Pursuant to 28 U.S.C. § 1746, I, [REDACTED], known for the purpose of this case as Jane Doe #3, hereby declare and state as follows:

1. I am over the age of eighteen years, and I make this declaration based on my own personal knowledge. If asked to do so, I could testify truthfully about the matters contained herein.

2. I am a dual citizen of the United States and Iran.

3. I first came to the United States as a student in 1995. I became a US citizen in 2004.

4. I currently live in Potomac, Maryland with my husband, and we have two adult twin boys. We first met while I was a student, and were married in August 1995.

5. I am employed as a special education teacher for Montgomery County Public Schools, where I have worked since 2006. I earned a Master's degree in Education from George Washington University in Washington, DC.

6. After I became a U.S. citizen in 2004, I completed and filed I-130 petitions for my two brothers, mother, and father in October 2004. My oldest brother is now a U.S. citizen; my mother is a U.S. citizen; and my father is a Lawful Permanent Resident.

7. My youngest brother is the only one in our family who is still in Iran awaiting final approval of his pending visa application. The I-130 application was approved in late 2005. Because the waiting process for siblings is very long, my brother had been waiting his turn since that time. In May 2017, we finally received a letter saying that my brother's application is ready for processing, and that an interview should be scheduled soon. A few months later, they asked us to resubmit one of the documents in support of his application, and we did that in September 2017, at which point we were informed that his interview should be scheduled soon. After many long years of waiting, we were finally approaching the end of the process.

8. I am aware of the September 24, 2017 Presidential Proclamation banning most travelers from Iran. If it goes into full effect on October 18, I understand that my brother's application will no longer move forward and he will not be issued an immigrant visa. He will be prevented from entering the United States and rejoining his family.

9. The ban on my brother has caused me a great deal of uncertainty, and I have been confused, disheartened, and extremely disappointed about the third iteration of the ban on Muslims and Iranians. I fear that my brother will remain separated from the rest of my family, who all live with me in the United States. He is the only one left in Iran, and we are eagerly awaiting the time when he can come and be reunited with us. I also fear that the Proclamation will result in more hatred and attacks against my community, and I fear for my safety and the safety of my loved ones.

10. It is important for me to remain anonymous in this lawsuit. I am aware of increasing hostility against Iranians and Muslims in the United States. I am also aware of a significant rise in hate crimes against people who are or are perceived to be Muslim, and I fear for the safety and well-being of my family and myself. I am also afraid of retaliation against my brother in the form of a pretextual denial of his visa applications. I wish to remain anonymous in order to protect myself and my family members from these harms.

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

Executed on October 5, 2017.



Exhibit 5

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

IRANIAN ALLIANCES ACROSS BORDERS;
et al.

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; *et al.*

Defendants.

Case No. 17-cv-02921-TDC

DECLARATION OF JANE DOE #5

Pursuant to 28 U.S.C. § 1746, I, [REDACTED], known for the purpose of this case as Jane Doe #5, hereby declare and state as follows:

1. I am over the age of eighteen years, and I make this declaration based on my own personal knowledge. If asked to do so, I could testify truthfully about the matters contained herein.

2. I am a Lawful Permanent Resident. My husband and I live in the United States with my son, who became a US citizen in 2009 and has been living in the United States since 2004.

3. My husband and I came to the United States in 2010 to join him here. We came in as immigrants and have lived with him in Maryland ever since.

4. My other son currently remains in Iran. I applied to sponsor him shortly after I came to the United States, and the I-130 petition was approved in November 2010.

5. In December 2016, after a long time spent waiting his turn until his visa was ready to be processed, my son received a letter scheduling his interview with the U.S. Embassy in Ankara, Turkey for February 5, 2017. I thought that we were finally at the end of this long process, and would soon be reunited with my son. Before he had his interview, however, President Trump issued the first travel ban and as a result, my son's interview was canceled. After the travel ban was struck down by the courts, his interview was rescheduled for March 20, 2017. He completed his interview and is now awaiting final approval. If the travel ban goes into full effect on October 18, I understand that my son's visa will not be issued, and my separation from him will be prolonged even further.

6. My son is now by himself in Iran, and he wants to come join us here in the United States. I also very much want and need him to be here. I am 79 years old, and as a result of several health issues, am now wheelchair-bound. My husband is 90 years old. He has problems with balance and falls if he walks by himself. It is very difficult for my other son to take care of us by himself, and very hard for us to get around or meet our own needs. We desperately need my other son to be here also.

7. Ever since I found out about the Proclamation, I have been extremely anxious, sad, and worried. I am afraid that I will never be able to see my son. I am afraid that he will not be able to come and be with his elderly parents. This causes me great pain and suffering on a daily basis.

8. I also feel personally attacked, targeted, and disparaged by this new Proclamation, which shows hostility to Iranians generally and to Muslims in particular. It is distressing to feel that the country I call home is targeting me and my children. It also makes me fear for my safety and the safety of my sons and others in my community. By targeting us and treating us like a

threat, the Proclamation encourages people to hate us, and I am afraid of what will come if it goes fully into effect.

9. It is important for me to remain anonymous in this lawsuit. I am aware of rising anti-Muslim and anti-Iranian sentiment related to this Proclamation, and I am afraid of the consequences of revealing my identity. I do not want my family to be targeted or attacked. I also do not want to share private, sensitive information about my religion, my nationality, and my family members' immigration status.

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

Executed on October 5, 2017.

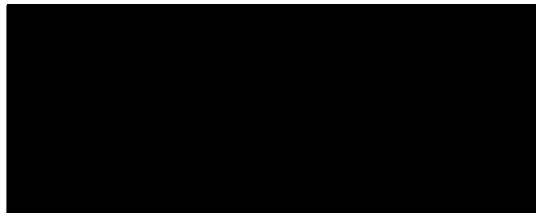


Exhibit 6

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION

IRANIAN ALLIANCES ACROSS BORDERS;
et al.

Plaintiffs,

v.

Case No. 17-cv-02921-TDC

DONALD J. TRUMP, in his official capacity as
President of the United States; *et al.*

Defendants.

DECLARATION OF JOHN DOE #6

Pursuant to 28 U.S.C. § 1746, I, [REDACTED], known for the purpose of this case as John Doe #6, hereby declare and state as follows:

1. I am over the age of eighteen years, and I make this declaration based on my own personal knowledge. If asked to do so, I could testify truthfully about the matters contained herein.
2. I am an Iranian national and a Lawful Permanent Resident. I live in Maryland with my wife, who is also Iranian. I am an engineer, and she is a researcher in Biochemistry at the National Institutes of Health.
3. I came to the United States in 2012 on an immigrant visa that I obtained through the Diversity Visa Lottery and have built my life here in Maryland since 2013.
4. My wife's sister and mother both currently live in Iran. They came to visit us in 2015, but we have not seen them since. Their absence has a heavy impact on my wife, who misses them deeply and was eagerly awaiting their next visit.

5. In November 2016, they both applied for a B1/B2 visa to come visit us. They were interviewed in Dubai on January 5, 2017, and they are currently awaiting issuance of their visas. If the Proclamation goes into effect on October 18, they will not be able to come and visit with us, and my wife will be completely devastated. She is already very lonely and feeling their absence, and she feels she is breaking a promise she made to her mother when she left Iran that she would see her at least once every year.

6. Ever since I found out about the Proclamation, I have been extremely anxious, sad, and worried. I fear that my wife and I will be able to visit with our family members. I fear that my sister- and mother-in-law will not be able to see us regularly, and that my brother will not be able to gain entry into the United States.

7. We came to the United States to take advantage of opportunities, to study and learn, and to contribute our skills to our new home and community. Now, we feel as if we have become targeted and threatened.

8. In my job, I contribute to the work of this government: I am an engineer and my company has government contracts and we do major jobs for the government. It feels especially unjust and injurious that, even while I am contributing to helping the government do its work, the government is now targeting me and telling me that my family and I do not belong here.

9. I feel personally attacked, targeted, and disparaged by this new Proclamation, which shows hostility to Iranians generally and to Muslims in particular. It makes me feel like an outsider in the country that I call my home. And it makes me fear for my safety and the safety of my wife, my loved ones, and my community.

10. It is important for me to remain anonymous in this lawsuit. I am aware of rising anti-Muslim and anti-Iranian sentiment related to this Proclamation, and I am afraid of the

consequences of revealing my identity. I do not want my family to be targeted or attacked. I also do not want to share private, sensitive information about my religion, my nationality, and my family members' immigration status, and I do not want my application for naturalization to be impacted by my pursuit of this legal challenge.

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

Executed on October 5, 2017.

