

**DECLARATION OF JOHN DOE 1**

I, JOHN DOE 1, declare as follows:

1. I was originally born in Yemen and am a naturalized U.S. citizen. I have lived in Hawaii for almost 30 years.
2. My wife and all four of my children are U.S. citizens as well, either born in the United States or naturalized. Two of my children are under the age of 14.
3. We are all Muslims, and are members of the mosque where Dr. Ismail Elshikh is imam.
4. One of my daughters is married to a young man from Yemen.
5. They have a young toddler child, who was born in Hawaii and is also a U.S. citizen.
6. My son-in-law fled Yemen to escape the civil war and eventually ended up in Malaysia. My daughter and their child, for the past year and a half, have had to go back and forth between Hawaii and Malaysia just to see him.
7. In September 2015, my daughter filed a petition to allow my son-in-law to immigrate to the United States as the spouse of a U.S. citizen.
9. In late June 2017, my daughter was informed by U.S. Citizenship and Immigration Services that her visa petition on behalf of my son-in-law had successfully passed through the clearance stage. They have now filed all of the necessary paperwork for his visa application with the National Visa Center (“NVC”).

Unless they hear that something more is needed from NVC, the next step is for my son-in-law to then receive an interview at a U.S. embassy overseas. My daughter's attorney estimates that, under normal visa processing procedures, my son-in-law would receive a visa within the next three to twelve months.

10. The issuance of the President's proclamation on September 24, 2017, affecting eight countries in total and banning nationals of six predominantly Muslim countries (including Yemen) from obtaining immigrant visas, creates great uncertainty as to whether my son-in-law will be able to come to Hawaii.

11. The rest of my family and I miss my son-in-law very much. We want only to be able to live in Hawaii with my daughter, her husband, and our grandchild, as one big family.

12. I have worked hard to build a life in Hawaii and to become a part of this community.

13. If the September 24 proclamation is not enjoined, it will ban my son-in-law from immigrating to the United States and moving to Hawaii simply because he is of Yemeni descent—because he is a national of a Muslim-majority country. The moment its operative provision takes effect, the proclamation will divide up my family across the world, and prevent my wife and me, as well as our other children, from sharing our daily lives with our daughter, son-in-law, and grandchild. We are a close family, and we are proud American citizens and Hawaii residents. It is hard not

to feel that the proclamation, in its entirety, discriminates against us—and imposes a concrete hardship upon our family that our neighbors do not have to experience— simply because we are Muslim and because my daughter has married a Muslim from a Muslim-majority country. By singling our family out for special burdens, the proclamation denigrates us because of our faith and sends a message that Muslims are outsiders and are not welcome in this country. That is unfair, and it is not right.

14. I have asked my attorney to file this declaration anonymously because I am afraid that if I identify myself, it could delay my son-in-law's visa application even further. Our family's ability to reunify is based entirely this process. I am also afraid that I, my wife, or my children may be subject to public reprisals if my name is publicized. Two of my children who live at home are still very young and should not have to face such consequences.

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

DATED: Honolulu, Hawaii, October 5, 2017.

  
JOHN DOE 1

**DECLARATION OF JOHN DOE 2**

I, JOHN DOE 2, declare as follows:

1. I was born in Iran.
2. I am a lawful permanent resident of the United States, currently living in Hawai‘i.
3. I am a professor at the University of Hawai‘i.
4. My mother is an Iranian national living in Iran. She intends to visit me in Hawai‘i. She filed an application for a tourist visa several months ago, and that application is currently pending.
5. A few of my close relatives, both Iranian nationals living in Iran, also intend to visit me in Hawai‘i. They have pending tourist visa applications which they filed a few months ago, and were recently interviewed. They intend to visit me in Hawai‘i as soon as their applications are approved.
6. I understand that on September 24, 2017, President Trump issued a “Presidential Proclamation Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry Into the United States by Terrorists or Other Public-Safety Threats,” which restricts entry into the United States by nationals of eight countries, including Iran. I understand that the proclamation blocks the issuance of tourist visas to Iranian nationals entirely, even if they just want to come to visit their family members in America.



7. As a result of the President's proclamation, my mother and my close relatives—all Iranian nationals—will not be able to enter the United States.

8. The proclamation separates me from my family. Given that the proclamation's restrictions apply indefinitely, I am less likely to remain in the United States long-term, where I will be deprived of the company of my family.

9. My mother and close relatives are peaceful people who pose no national security threat whatsoever. Still, they are barred from setting foot in the United States. This makes my life extremely difficult as I cannot even host my family members and relatives in my home in the United States because they are nationals of Iran. And that makes me feel like an outcast in my own country, because I am also a national of Iran.

10. I have requested that this declaration be filed anonymously because I am afraid that if I identify myself, it could further delay the visa applications my mother and close relatives have filed. I am also afraid that I may be subject to public reprisals if my name is publicized. I feel I need to take steps to protect my identity because Hawai'i is a small community and with enough information, it would not be difficult to identify me.

I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: Honolulu, Hawai'i, October 4, 2017.

A large black rectangular redaction box covering the signature area.

JOHN DOE 2

**DECLARATION OF JANE DOE # 3**

I, Jane Doe #3, do attest and would competently testify as follows:

1. I was born in Iran.
2. I became a United States citizen in the summer of 2017. While I pursued my degrees in the United States, I was on a student visa. I have lived in the United States for more than 10 years.
3. I am currently a professor of Civil Engineering at a university on the East Coast of the United States. I received my undergraduate and master's degree in Civil Engineering in Iran. I received my PhD and pursued post-doctoral work at two prominent and well-respected American universities.
4. I am aware that President Trump issued an executive order on January 27, 2017, which temporarily banned travel from seven Muslim-majority countries, including Iran. I am also aware that on March 6, 2017, President Trump issued a new executive order that temporarily banned travel from six Muslim-majority countries, including Iran. I also understand that on September 24, 2017, President Trump issued a "Presidential Proclamation Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry into the United States by Terrorists or

Other Public-Safety Threats,” which imposes restrictions on entry into the United States by nationals of eight countries, including Iran.

5. In late January 2017, my husband and I were traveling back to the United States from Europe and were detained at an airport in the United States during the implementation of the first travel ban. My husband is also an Iranian national and a lawful permanent resident of the United States. At the time I was a lawful permanent resident, though I subsequently became a citizen. We were eventually released and allowed to return to our home.
6. I understand that we were permitted to enter the United States that day because of litigation in the federal courts regarding the first travel ban.
7. This experience was very unsettling to me and my husband. We both rely on international travel for our work and to visit our families.
8. I was unwilling to travel out of the United States until I was assured of my ability to travel reliably in and out of the country.
9. In 2016, my husband developed a serious health concern. I needed the support of my family. My mother, who is Iranian, agreed to come to the United States to assist me.
10. My mother went to the U.S. embassy in Dubai and tried to get an emergency appointment for a non-immigrant tourist visa. In the summer

of 2016, we were told that her case was placed under administrative processing. Her application for a visa is still pending and we are still waiting. We received confirmation in the spring of 2017 that the visa application is still in processing, but have heard nothing since.

11. Meanwhile, the health situation with my husband has continued and I still do not have the support of my family.

12. In the spring of 2017, my father, who is also Iranian, submitted a non-immigrant tourist visa application as well, in the hopes that he could come to the United States to assist me. Like my mother's, his visa application is still pending.

13. Since January 2017, when the first travel ban was implemented, my family and I have faced great uncertainty about whether my family member in Iran will ever be permitted to come visit me in the United States. If the third travel ban is implemented, it will make it difficult if not impossible for my parents to obtain visas to enter the United States. I will be left without the support of my family in my time of need.

14. Since January, and especially since the third travel ban was announced recently, I regularly think about leaving the United States. It is difficult for me to make the trip to Iran frequently, given my work obligations.

But now because of the President's travel bans, my close family members



in Iran, including my parents and my sibling, who is also Iranian, cannot come to see me. If the third travel ban is implemented, I will seriously consider looking for work in other countries, perhaps in Europe. I understand that it would be easier for my parents to obtain visas to travel there, so that they would be able to visit me frequently. I otherwise would have no intention of leaving the United States.

15. I am personally aware of the impact the travel bans have had on university communities. In the summer of 2017, there was one Iranian student in particular I tried to recruit to attend my university. Our university offered him admission, financial aid, and assisted with procuring a student visa. He still declined, because of the uncertainty caused by the two travel bans and the visa process and opted to pursue his studies in Canada instead. To my knowledge, the same phenomenon has played out in other universities across the United States. I have also heard from Iranian students that Iranians are now generally more inclined to pursue their studies in Europe or Canada, because of the travel bans. Before the travel bans, universities in the United States were generally the best option for strong applicants.

16. This, in addition to my own experience, has shown me just how damaging implementation of the travel bans has been. It has dramatically

affected my life and my husband's life and threatens to permanently deprive me of the support and assistance of our parents and family.

17. I am submitting this declaration anonymously because I am afraid that if I identify myself, I may be subject to public reprisals. The Iranian community is a small one, as is the university community in which I work.

I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: [REDACTED] October 5, 2017.

[REDACTED]  
Jane Doe #3

**DECLARATION OF JOHN DOE # 4**

I, John Doe 4, do declare and would competently testify as follows.

1. I was born in Iran in 1985. I am a citizen of Iran.
2. I am a professor of Engineering at a university in the American West.
3. I received my undergraduate and masters degrees in Iran and my PhD from the University of California. I also pursued my post-doc work in California.
4. I have lived in the United States since 2010. I received my green card in October 2015. Before that, I had only a single-entry F-1 student visa.
5. I am aware that President Trump issued an executive order on January 27, 2017, which temporarily banned travel from seven Muslim-majority countries, including Iran. I am also aware that on March 6, 2017, President Trump issued a new executive order that temporarily banned travel from six Muslim-majority countries, including Iran. I also understand that on September 24, 2017, President Trump issued a “Presidential Proclamation Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry Into the United States by Terrorists or Other Public-Safety Threats,” which imposes restrictions on entry into the United States by nationals of eight countries, including Iran.
6. I was personally impacted by the first travel ban. Just after that ban went into effect, there was a conference in Iran in February, 2017, that many in



my field were scheduled to attend. The travel was already arranged and organizers had promised to cover the expenses. But none of the professionals in the United States – even the U.S. citizens – went to this event because of the confusion and delay caused by the first order. In fact, a highly respected member of the National Academy of Sciences, himself Iranian, personally advised me not to attend. I did not attend. The risk in traveling outside the United States was too great.

7. My parents both have pending tourist visa applications. Both of them are Iranian. Both were interviewed at the U.S. Embassy in Dubai in the summer of 2017. My mother received an offer for a visa but at the time my father did not. My father's visa was referred for further processing.
8. My parents both have health issues and neither can travel such a long distance alone. Therefore my mother requested that her visa application be held until my father's visa application was completed. At this time we are still waiting for them to be issued tourist visas so they can come to the United States and see me.
9. I came to the United States hoping for a better life. This country has offered me so much and I had always hoped to stay here. I love this country and it is my home.

10. As I look back now, I think about the losses I've faced in my life when I could not travel. When I was a student in the United States, I missed so many critical family events because I had only a single-entry visa and could not risk the uncertainty involved with whether I would be able to return to my studies.

11. I missed so many things with my family: my sister got married in Iran and I could not attend. My father and mother both developed serious health issues and I could not go back to support them. My grandparents died and I could not attend the funeral nor mourn together with my family. All those years I hoped for a better future, when my travel status would be assured.

12. Now, with the third travel ban announced, I feel like that hope is gone. I question whether living in the United States is still the best option and decision for my life. I face the same problem as so many others: my parents are getting older, and I wonder how many more years they will be with me. The third travel ban makes it difficult if not impossible for my family members to visit me. As a result I have thought seriously about moving to another country where my family would be free to visit me.

13. I am married. My wife is also Iranian. Her application for a green card is pending. She has a serious medical condition and I cannot leave her alone.

14. Because I have a green card, I know that I can travel in and out of the United States under the new travel ban. But, practically speaking, I cannot, because I cannot leave my wife. If my parents cannot visit me here, then I will be entirely cut off from my family.

15. I am personally aware of the impact the travel bans have had on the university community. At my university, I have seen several good students, all Iranians, decide against attending school in the United States. Instead they are choosing to pursue their studies elsewhere, primarily in Canada and Australia.

16. I have requested that this declaration be filed anonymously because I am afraid that if I identify myself, I may be subject to public reprisals. I am also afraid that my family's pending visa or green card applications might be negatively impacted.

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

DATED: [REDACTED] October 5, 2017.

[REDACTED]  
JOHN DOE 4/

**DECLARATION OF JOHN DOE 5**

I, JOHN DOE 5, declare as follows:

1. I was born in Iran.
2. I am a dual citizen of Iran and Canada.
3. I am a lawful permanent resident of the United States and I live in Hawai‘i. I am currently in Dubai, but will soon be returning to Hawai‘i.
4. I am a professor of Mechanical Engineering at the University of Hawai‘i.
5. I am aware that President Trump issued an executive order on January 27, 2017, which temporarily banned travel from seven Muslim-majority countries, including Iran. I am also aware that on March 6, 2017, President Trump issued a new executive order that temporarily banned travel from six Muslim-majority countries, including Iran. I also understand that on September 24, 2017, President Trump issued a “Presidential Proclamation Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry Into the United States by Terrorists or Other Public-Safety Threats,” which imposes restrictions on entry into the United States by nationals of eight countries, including Iran.
6. The University of Hawai‘i’s college of engineering regularly hires students from Iran as graduate research assistants. More than 50% of the

department of mechanical engineering's PhD graduates in the last two years were Iranian nationals.

7. The President's travel bans have hurt PhD recruitment efforts by the University's college of engineering, and the University's overall competitiveness in attracting students to the institution. I am personally involved in recruiting for a research lab that I run, and I have noticed that fewer students are interested in attending graduate programs in the United States, including at the University, because of the uncertainty, burden, and inconvenience created by the President's travel bans. This past summer, I personally spoke with five Iranian students who all expressed hesitation about studying at the University because of the President's prior travel bans. Many students are interested in attending programs in Canada or Europe instead. This same harm to our recruitment will continue under the President's most recent proclamation. Even though there are some exemptions for student visas from Iran, it is not clear that these students, once they come to America, would be able to leave the country and come back (for example, if they obtain only single-entry visas). Moreover, many of my Iranian graduate students over the years have come to Hawai'i with spouses or partners during their studies, or have received visits from family members during their years in the United States. The President's proclamation will make it much more difficult, if not impossible, for close relatives to accompany or visit the students. PhD

recruitment is a highly competitive process for universities, and students tend to be weary of barriers that force them to choose between their studies and their families. As a result, I firmly believe that the President's proclamation will continue to have a terrible impact on the ability of my lab, and the college of engineering as a whole, to recruit the best and brightest Iranian students.

8. The travel bans, by hampering the University's recruitment efforts, also negatively impact the engineering program's research funding. Research grants are highly competitive, and our competitiveness at the University is often directly related to the quality of our graduate students. If we cannot bring in the best students, many of whom have historically come from Iran, we may lose competitive grants, which hurts our research funding.

9. The President's travel bans have also affected me personally. As a result of the uncertainty created by the first travel ban, including whether it would be applied to legal permanent residents, I had to cancel a trip to Sri Lanka and a trip to Europe to ensure that I would not be barred from reentering the country. I also have many family members currently living in Iran, including my parents, siblings, aunts, and uncles. They are all Iranian nationals. My mother and my sister would like to visit me in Hawai'i. We have discussed plans for them to visit, but the President's various travel bans, including the recent proclamation, have interfered with our plans. As a result of the President's recent proclamation, which

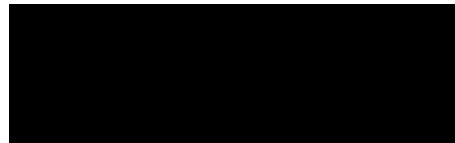
bars the issuance of tourist visas to Iranian nationals entirely, my mother and my sister will not be able to enter the United States to visit me.

10. The President's recent proclamation separates me from my family. If the proclamation remains in place, I intend to return to Canada. If I remain in the United States, I will not be able to enjoy my family's company.

11. I have requested that this declaration be filed anonymously because I am afraid that if I identify myself, I may be subject to public reprisals.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: Dubai, United Arab Emirates, October 05, 2017.

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JOHN DOE 5

DECLARATION OF DONALD O. STRANEY

I, Donald O. Straney, do declare and would competently testify as follows.

1. I am Vice President for Academic Planning and Policy, at the University of Hawai'i System ("University"). I started in this position on August 1, 2017. From 2010 to 2017, I served as chancellor at the University of Hawai'i at Hilo. I served on the board of directors of the Hawai'i Island Chamber of Commerce and the Hawai'i County Workforce Development Board. Previously, I served eight years as dean of the College of Science and Professor of Biology at California State Polytechnic University, Pomona. As Vice President for Academic Planning and Policy, I serve as the chief academic officer for the University with overall responsibility for leadership, planning and intercampus coordination of academic affairs, student affairs, policy and planning, institutional research and analysis, international and strategic initiatives and Hawai'i P-20 Partnerships for Education.

2. The University was founded in 1907 and includes three universities, seven community colleges, and community-based learning centers across six of the Hawaiian Islands.



3. The University is a leading engine for economic growth and diversification in Hawai'i. The University stimulates the local economy with jobs, research, and skilled workers.

4. The University is a unique and important institution in our island State, and in our nation. Because of Hawaii's geographic isolation, the University is able to offer unique research and employment opportunities in the fields of astronomy and oceanography.

5. Hawaii's location in the Pacific Ocean, balanced between east and west, creates opportunities for international leadership and collaboration.

6. I am aware that President Trump issued an executive order on January 27, 2017, which temporarily banned travel from seven Muslim-majority countries. I am also aware that on March 6, 2017, President Trump issued a new executive order that temporarily banned travel from six Muslim-majority countries, and did not apply to legal permanent residents or other designated, limited, and narrow categories of non-citizens. I also aware that on September 24, 2017, President Trump issued a third proclamation instituting a permanent travel ban. The new executive order applies to eight countries, six of which are majority-Muslim. My understanding is that under the new order, the issuance of immigrant visas to nationals of seven countries—Chad, Iran, Libya, North Korea, Somalia, Syria, and Yemen—is indefinitely suspended. My understanding is also that under

the new order, the issuance of many classes of visitor visas to nationals of the eight countries is suspended. I have also been informed that these new bars to travel to the United States apply regardless of whether the person in question poses any individualized threat of violence or any connection to terrorist activities.

7. The University is an international institution. This is reflected in our diverse faculty, which includes approximately 313 international faculty and scholars from 48 different countries. Throughout the University, we have 493 separate international agreements with 357 institutions in 40 different countries, providing opportunities for learning and collaboration for our faculty and scholars.

8. As with all institutions of higher learning, the scholarship and community of the University rely upon the collaborative exchanges of ideas and research partnerships. The University relies upon faculty, teaching, research, conferences, and program activities that regularly require travel outside the United States. The new travel ban will undermine the University's ability to fully engage in the international exchange of ideas and research partnerships. Current faculty and scholar members and students at the University who are nationals of the eight designated countries, or who have close family members who are nationals of the eight designated countries, may be reluctant to remain at the University given the inability for certain family members and colleagues from abroad to immigrate and live with them or visit them here. Likewise, prospective faculty members, visiting

scholars, and students from the eight designated countries could be blocked altogether from coming to the University—or highly dissuaded from doing so, given the travel ban’s effect on some of their relatives. This uncertainty threatens the University’s recruitment, educational programming, and educational mission.

9. The travel ban will also hinder the diversity of thought and experience that forms the backbone of any institution of higher education. A diverse student body is part of the educational experience for all students. Given my experience in higher education, I expect that the new executive order will deter students, scholars, and faculty from attending our institution—including both persons from the eight directly affected countries, but also persons from other countries and communities around the globe.

10. The executive order will directly impact the faculty and student body at the University in a number of ways.

11. I am concerned that the environment caused by these federal orders might dissuade some of our current professors or scholars from continuing their work in the United States and at our institution.

12. International students are also critical to the University’s student body. At the University presently, there are 973 international students, 526 of them graduate students. Twenty of these international students are from the 8 designated countries, specifically from Chad, Iran, Libya, North Korea, Somalia,

Syria, Venezuela, or Yemen. These students attend our institution under valid visas issued by the United States government. They study and work alongside the University's many thousands of other students. Many of these current students at the University could be affected by the new travel ban, because certain family members from the eight designated countries will not be able to obtain visas to temporarily live with them here or even visit them here.

13. Although it is too soon to determine the full impact of the new executive order on the University's future admission pool, international applications for undergraduate students and graduate students may be negatively impacted. The University receives applications from, and offers admissions to, students from the 8 designated countries. For Fall 2017, the University received 45 graduate applications from individuals from the eight affected countries and extended offers to at least 18 applicants. For Spring 2018, the University received 5 graduate applications from individuals from the eight affected countries. The University expects that under ordinary circumstances, it would continue to receive applications from –and offer admissions to—students from any of the 8 designated countries for the Fall 2018 Term.

14. The University expects that the ban may negatively impact our students and institution. Students from the eight affected countries will be unable to bring significant others who are nationals of the affected countries with them to

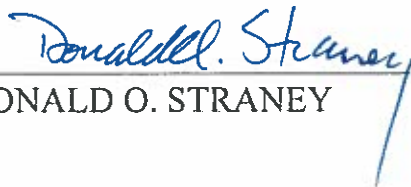
the University and they will be unable to receive visitors from some family members who are nationals of their home countries. Together these impacts may chill these students' desire to enroll in the University as compared to universities in other countries.

15. Finally, the travel ban will affect the ability of faculty and students at the University to have the freedom to fully engage in their fields of study. It will prevent them from hosting speakers or visitors from the eight designated countries. It will prevent them from planning international exchange events.

16. As with the State of Hawai'i generally, the University prides itself on a reputation of inclusiveness, tolerance, and diversity. The new travel ban threatens this reputation, and our ability to fully embrace our priority as a global university and one of the most diverse institutions of higher education.

I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: October 6, 2017, in Honolulu, Hawai'i.

  
DONALD O. STRANEY

## DECLARATION OF GAYE CHAN

I, GAYE CHAN, do declare and would competently testify as follows:

1. I am Chair of the Department of Art and Art History (“Department”) at the University of Hawai‘i at Mānoa. I have served in this capacity since 2006. I also serve as a Professor in the Department. I have served as a Professor since 1991.

2. The Department, established over 75 years ago, remains one of the largest departments within the University. The Department oversees approximately 300 undergraduates pursuing degree programs in studio art and art history. In addition, students from other departments annually occupy over 3,000 seats in the Department’s art classes to fulfill their university requirements and to learn global artistic traditions. Each year, the Department draws in approximately 50,000 students and members of the general public to participate in its exhibitions, programming, and outreach opportunities.

3. The Department consists of twenty-one full-time faculty members; twenty-six adjunct instructional staff, affiliate faculty, and visiting professors; and countless visiting artists, designers, and scholars.

4. As Chair of the Department, I oversee and contribute to organizing our formal visiting artist, designer, and scholar program, known as Intersections. Intersections brings in national and international members of the art community

each semester to provide both students and the general public with lectures, classroom visits, studio critiques, community presentations, and workshops or exhibitions. The length of these visits varies from 2-3 days, to an entire semester, depending on funding and availability. Intersections is a self-funded program that relies on internal fundraising and donations to attract visiting artists and scholars.

5. The Department's visiting artists, designers and scholars are often aligned with exhibitions that focus on curatorial themes, including specific traditions and geographic regions known for a particular approach to art. While planning for the spring 2018 semester, a donor reached out to express an interest in funding Persian/Iranian art initiatives, including visiting artists, scholars and exhibits. The University's student body and the public are mostly exposed to Hawai'i and American artists, so this funding presents an opportunity to broaden the State's exposure to artists from diverse and varied backgrounds.

6. In scouting artists to recruit for Intersections, the Department compiled a list of candidates with a background in Persian, Iranian, and Middle Eastern art. Of the candidates, one is a Syrian national living in Germany, and two are Iranian nationals living in Dubai. All three are award-winning conceptual artists who have held exhibitions around the globe. They are considered "rising stars" in the art world.



7. In Hawai‘i, exposure to contemporary art is limited. On O‘ahu, only the Honolulu Museum of Art features contemporary art in its programming, and there is little opportunity for students to work with burgeoning artists in the field. As a result, the State relies heavily on the University’s Intersections program to attract contemporary artists to contribute to the overall cultural scene of Hawai‘i.

8. Pending availability, the Department is considering offering an invitation to these artists through its Intersections program.

9. The Department is aware that President Trump issued an executive order on September 24, 2017, which bars the entry of Syrian nationals into the United States, and severely restricts the entry of Iranian nationals by narrowing the scope of permissible visas.

10. The latest travel ban will impede the Department’s efforts to recruit the Syrian national to come to the University this spring as part of its visiting arts and scholars program, and will complicate the Department’s efforts to invite the two Iranian nationals. Because of the President’s proclamation, no visas will be available for any Syrian nationals to come to Hawai‘i. As to the two Iranian artists, the proclamation allows for only a limited set of non-immigrant visas to nationals of Iran, and it is unclear if the Iranian artists that the Department hopes to invite would be able to come to the United States on those visas. If either the Syrian or Iranian nationals cannot enter the United States, the Department will



have to consider foregoing its plans to host an exhibition of Persian and Iranian artwork.

11. The new travel ban also impedes the Department's ability to host nationals of the affected countries as visiting scholars or artists in the future. Future screening of visitors based on nationality and country of origin will be required. In effect, the travel ban will prohibit an entire body of art by limiting the movement of those who produce it. This impedes with the Department's role as a comprehensive and diverse center for undergraduate and graduate study.

I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: Honolulu, Hawai'i, October 4, 2017

  
GAYE CHAN

**DECLARATION OF NANDITA SHARMA**

I, NANDITA SHARMA, do declare and would competently testify as follows:

1. I am an Associate Professor in the Department of Sociology at the University of Hawai‘i at Mānoa. I have served in this role since August 2008. From August 2006 to July 2008, I was an Assistant Professor jointly in Sociology and Ethnic Studies at the University of Hawai‘i at Mānoa.

2. I am the Director of the University’s International Cultural Studies Program, a graduate certificate program open to any graduate student enrolled at the University. The International Cultural Studies Program, which has operated at the University for the past 20 years, takes a distinctive approach to culture, recognizing that culture is continually being made and remade through political, social, and economic forces. The University’s cultural studies program is unique among cultural studies programs because it has an explicitly international focus and actively seeks to bring subjects of an international character to its U.S. audience.

3. Each semester, the International Cultural Studies Program organizes a Speaker Series, through which various scholars and speakers are invited to the University to discuss timely issues relevant to cultural studies. Students

participating in the International Cultural Studies Program are required to attend the Speaker Series to develop a broad understanding of current issues from a cultural studies perspective. The Speaker Series presentations are also open to other University students, to University faculty, and to the general public.

4. In September 2017, the International Cultural Studies Program organized a Speaker Series presentation with two journalists, both Syrian nationals from the group Raqqa is Being Slaughtered Silently (“RBSS”). One of the Syrian nationals that was set to participate in the Speaker Series was denied a visa by a U.S. Consulate, preventing that person from entering the United States and speaking at the University.

5. Although we were disappointed to lose the important perspective of one of the Syrian nationals, we continued on with the Speaker Series presentation with the other Syrian national, who obtained a B-1/B-2 visa to enter the United States. He discussed, in depth, recent events in Syria and the work of his organization, RBSS.

6. As a direct result of the Speaker Series, various professors at the University of Hawai‘i would like to offer a scholarship to the Syrian national who participated in the recent presentation at the University.

7. I am aware that President Trump issued a “Presidential Proclamation Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry Into the United States by Terrorists or Other Public-Safety Threats” on September 24, 2017, which, among other things, indefinitely suspends the entry of Syrian nationals into the United States and the issuance of visas to Syrian nationals.

8. The latest travel ban will impede the University’s efforts to recruit and enroll the Syrian national to whom the University would like to offer a scholarship. The Syrian national has a refugee travel document issued by Germany that is set to expire soon. As a result, it is my understanding that this individual’s U.S. B-1/B-2 visa (whose issuance was contingent on the German travel document) will become useless by mid-November, and that this individual, who is currently outside the United States, will need to obtain a new U.S. visa to enter the United States. Because of the President’s new travel ban, this Syrian national will not be able to accept the University’s scholarship offer and will be precluded from attending the University.

9. The new travel ban also impedes the University’s ability to host nationals of the affected countries as visiting scholars or speakers. For instance, the International Cultural Studies Program has invited a Syrian national who is an expert on the Syrian revolution to participate in a Speaker Series presentation this

coming year. The Syrian national has indicated interest in participating in this event either in November 2017 or in January 2018. However, this Syrian national lives outside the United States and will need a visitor visa to come to Hawai'i, which the President's new travel ban blocks. Because of the travel ban, the University unfortunately will not be able to hold its planned Speaker Series event with the Syrian national's participation this November or thereafter. That harms the University's ability to fulfill its educational mission.

10. The International Cultural Studies Program, through its ongoing relationship with the Honolulu Museum of Art, also intends to hold a Speaker Series event in conjunction with a film screening at the museum's Doris Duke Theatre. The Speaker Series event, to be held in Hawai'i, will involve a national of Chad, one of the countries affected by the latest travel ban. The Chadian national is the director of the film that the Doris Duke Theatre intends to show in connection with the visit. The Chadian national is an expert on human rights abuses in Chad. I am organizing a Speaker Series event involving the Chadian national's participation in the spring of 2018, and the Chadian national, who lives outside the United States, would need a visitor visa to participate.

11. I am aware that the latest travel ban suspends the issuance of business (B-1), tourist (B-2), and business/tourist (B-1/B-2) visas to nationals of Chad. The latest travel ban, therefore, would prevent the Chadian national from obtaining the visa necessary to participate in the University's planned Speaker Series event.

12. The new travel ban also negatively affects academic study and scholastic development at the University. The travel ban itself, in its various iterations, has become a topic of study at the University. The people affected by the travel ban are important resources in this burgeoning field of study, but access to those people is directly limited, perhaps indefinitely, by the travel ban. This impedes the development of scholarship in various departments, including sociology and political science, and interferes with the University's ability to foster academic relationships with affected individuals.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: Honolulu, Hawai'i, October 4, 2017.

  
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NANDITA SHARMA

I, Ismail Elshikh, Ph.D. declare the following:

1. I am an American citizen of Egyptian descent, and a resident of Hawai‘i. I have been a resident of Hawai‘i for over a decade. My wife, Dana, who is of Syrian descent, and my five children are also American citizens and residents of Hawai‘i. I am proud to be an American citizen, and consider the United States to be my home country. Because of my allegiance to America, and my deep belief in the American ideals of democracy and equality, I was deeply saddened by the passage of the President’s first and second Executive Orders, in January 2017 and then March 2017, barring nationals from Muslim majority countries from entering the United States. I am also deeply saddened by the President’s September 24, 2017 proclamation, entitled “Presidential Proclamation Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry Into the United States by Terrorists or Other Public-Safety Threats.” This third ban – on immigration and travel – still targets six Muslim-majority countries, including Syria, where I have several close family members. And unlike the prior ones, this ban is permanent.

2. I am the Imam of the Muslim Association of Hawai‘i. As Imam, I am a leader within the local Hawai‘i Islamic community. I believe strongly in the First Amendment, religious equality, and that individuals of different faiths should be allowed to exercise their religious beliefs, free from government suppression, and in a way that does not harm others. The members of my Mosque consider Hawai‘i

to be home. They are integrated into local society and culture. They have friends and family within and outside of the local Islamic community.

3. My five children are 12, 10, 8, 5 and 2 years of age. They have all been United States citizens, and Hawai'i residents, since birth. All of my children were born at Kaiser Hospital in Honolulu, Hawai'i. My older children attend school in Honolulu, and they have many friends from all walks of life. My children were aware of President Trump's first and second travel bans, and were deeply saddened by the message that both conveyed – that Muslims are uniquely dangerous and unwelcome, and that a broad travel ban is “needed” to prevent people from certain Muslim countries from entering the United States. They were, and still are, deeply affected by the knowledge that the United States – their own country – would discriminate against individuals who are of the same ethnicity as them, including members of their own family, and who hold the same religious beliefs. My children did not fully understand why the President issued those Executive Orders, but they felt hurt, confused, and sad.

4. The first and second travel bans, if they had been fully implemented, would have had a direct personal effect on me, my wife, and my children, by creating an obstacle to the ability of my mother-in-law (and my children's grandmother) to visit us in Hawai'i. My wife's mother is a Syrian national, and up until this past July 2017, she had been living in Syria. My wife filed an I-130



Petition for Alien Relative, on behalf of her mother, with the United States government in September 2015. The Petition was approved in February 2016, and my wife's mother was eagerly anticipating the completion of the rest of her visa application process. On January 31, 2017 – days after President Trump signed the first Executive Order putting in place the original travel ban – I called the National Visa Center to inquire as to whether the first Executive Order would impact my mother-in-law's visa application. I was told that it would; namely that as a result of the first Order, her application for an immigrant visa was on hold and would not proceed to the next stage in the process. On February 3, 2017, the District Court for the District of Washington temporarily enjoined the enforcement of the first travel ban, and the Ninth Circuit denied the Government's application for a stay. On March 2, 2017, we received an email from the National Visa Center informing us that my mother-in-law's visa application was in fact proceeding to the next stage of the process, and her interview would be scheduled at an embassy overseas. On March 6, 2017, the President signed the second travel ban. We expected that it was going to put us back in the position we were in on January 31 – that her application would be put on hold – but the Hawai'i District Court issued a preliminary injunction, and the Ninth Circuit and Supreme Court upheld the part of the injunction that pertained to my mother-in-law. My mother-in-law had her visa interview in May and this past July, she received her immigrant visa from the U.S.

embassy in Lebanon. In August, she came to live with my family in Hawai'i. We are enjoying her company immensely.

6. President Trump's September 24 Proclamation is once again against going to directly impact my family. My wife has four brothers who are Syrian nationals, all living in Syria with their families. Like my mother-in-law, they have for many months wanted to visit our family in Hawai'i. Because of the President's new Proclamation, my brothers-in-law will be banned from obtaining visas and blocked from visiting us indefinitely. In fact, one of my brothers-in-law recently filed for a visitor visa, on October 5, 2017, and his application is pending. My three sons were all born in the month of March, and they hope that this coming year – in March 2018 – they can celebrate their birthdays in one big party for which they'd invite their relatives. They especially want to invite their uncles to come from Syria, and celebrate this triple-birthday. The latest travel ban has destroyed their dream. They told me with a sad voice, "Dad, this is not fair."

7. As a result of the Proclamation, once again, I, my wife, and my children, will be denied the company of our close relatives solely because of our religion and nationality. This is very upsetting to us. Once again, the new Proclamation denigrates our faith and makes us feel that we are second-class citizens in our own country.

8. As an Imam, I work with many members of the Hawai'i Islamic community. Many members of my Mosque are upset about the President's Proclamation, and some are very fearful. They feel that the new immigration and travel ban targets Muslim citizens because of their religious views and national origin. The bans will have very real and direct impact upon their lives. Although many members of my Mosque consider Hawai'i to be home, many have family and friends still living in the countries affected by the Proclamation. While it remains in effect, these individuals live in forced separation from those family members and friends.

9. I have also seen the effect of the President's refugee bans on the members of my Mosque. At least one current member of our Mosque is a refugee from a Muslim-majority country, and in the past, the Mosque had as members a family in which the husband, wife, and oldest son were applying for political asylum. It is my experience that all members of my Mosque are enriched by our relationships with refugees from Muslim-majority countries, who join our Mosque to worship with us. I, and the members of my Mosque, perceive the President's bans on refugee admissions to be yet more attacks on Muslims.

10. I personally know of more than 20 individuals who are members of my community and mosque, who have immediate relatives in the six Muslim-majority countries designated under the Proclamation – especially Syria, Iran, and

Yemen. These persons will, once again, be unable to receive visits from their relatives, including spouses, parents, and children.

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

DATED: Honolulu, Hawai'i, October 6, 2017.

  
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ISMAIL ELSHIKH, Ph.D.

DECLARATION OF GEORGE SZIGETI

I, GEORGE SZIGETI, do declare and would competently testify as follows.

1. I am the President and Chief Executive Officer of the Hawai'i Tourism Authority (HTA). I have served in this role since May 2015. From 2012 to 2015, I was the President and CEO of the Hawai'i Lodging and Tourism Association, a private organization of Hawai'i tourism industry leaders, which represents over 700 lodging properties and businesses across the State.
2. The HTA was established in 1998 as the lead state agency for Hawaii's tourism industry. The HTA is the state agency charged with the research, development, and fostering of tourism in Hawai'i. HTA's mission is to strategically manage Hawai'i tourism in a sustainable manner consistent with economic goals, cultural values, preservation of natural resources, community desires, and visitor industry needs.
3. The Tourism Special Fund was also established in 1998. It is a set percentage of the transient accommodations tax collections that is assessed on hotels, vacation rentals, and other accommodations. It is used by the HTA to market, develop, and support Hawaii's tourism economy.
4. Among its responsibilities, HTA is charged with:
  - a. setting tourism policy and direction from a statewide perspective;

- b. developing and implementing the State's tourism marketing plan and efforts;
  - c. supporting programs and initiatives that enhance and showcase Hawaii's diverse peoples, places, and cultures of the islands, in order to deliver an incomparable visitor experience, including supporting Native Hawaiian culture and community, signature events and festivals, and preservation and proper use of Hawaii's striking natural resources;
  - d. managing programs and activities to sustain a healthy tourism industry for the State;
  - e. coordinating tourism-related research, planning, promotional and outreach activities with the public and private sectors; and
  - f. encouraging distribution of visitors across all of the Hawaiian Islands to balance capacity.
5. HTA maintains data regarding visitor arrivals and total visitor spending for various regions around the world.
6. The data maintained by our agency shows the following for the last five years:

	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
<b>Total Visitor Expenditures (in Million \$)</b>	\$14,364.8	\$14,520.5	\$14,973.3	\$15,110.9	\$15,745.7
<b>Total arrivals (by air and cruise ships)</b>					
<b>Total arrivals (by air and cruise ships)</b>	8,028,743	8,174,461	8,320,785	8,679,564	8,941,394
Arrivals by Air	7,867,143	8,003,474	8,196,342	8,563,018	8,832,598
Arrivals by cruise ship	161,600	170,987	124,443	116,546	108,796

The total visitor expenditures reported in this chart from 2012-2015 includes supplemental business expenditures. For 2016, the data is preliminary and the supplemental business expenditures have been estimated.

7. To translate, Hawaii’s tourism industry brought well over \$14 billion into the State during 2012 to 2014. In 2015 and 2016, it brought in over \$15 billion. Tourism is the leading economic driver in the State.
8. As this data shows, airline travel is far and away the preferred method to travel to Hawai‘i. In 2016, for example, a total of 8,941,394 people arrived in the islands. Only 108,796 of this total (1.2%) arrived by cruise ship.
9. Our data also shows that there is a steady flow of visitors from the Middle East and Africa. The data maintained by our agency shows the following for the last five years:

<b>Visitor Arrivals</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
Middle East	3,565	3,182	5,784	6,804	5,451
Africa	1,345	1,111	1,877	2,090	1,725

This data reflects visitor arrivals, in surveys taken for air arrivals. The 2016 data is preliminary.

10. The data maintained by our agency also shows the following monthly arrivals from the Middle East and Africa for the same time period (January to August) in 2017 and 2016:

	<b>Middle East</b>		<b>Africa</b>	
	<b>2017</b>	<b>2016</b>	<b>2017</b>	<b>2016</b>
January	278	348	89	141
February	155	403	38	119
March	284	320	86	73
April	300	322	98	134
May	323	442	119	162
June	263	338	152	102
July	694	881	258	113
August	587	874	155	315
<b>Total</b>	<b>2,884</b>	<b>3,928</b>	<b>995</b>	<b>1,159</b>

These statistics are preliminary and are based on survey data.

11. Therefore, this data shows that 2,884 visitors arrived from the Middle East from January to August 2017. This is a decrease from 3,928 visitors from the same region from January to August 2016.



12. This data also shows that 995 visitors arrived from Africa from January to August 2017. This is a decrease from 1,159 visitors who arrived from Africa from January to August 2016.
13. As our data is maintained, the region Middle East includes Iran, Syria, and Yemen.
14. As our data is maintained, the region Africa includes Chad, Libya, and Somalia.
15. HTA also maintains data about the reasons why visitors come to Hawai'i, such as vacation, business, or to visit family and friends.
16. Our data shows that in 2016, Hawai'i hosted more than 8.8 million visitors by air. Of these over 8.8 million visitors, approximately 5.4 million visitors came from elsewhere in the United States; 1.5 million came from Japan; 478,000 came from Canada; 443,000 came from other Asian countries; 399,000 came from Oceania (including Australia and New Zealand); 142,000 came from Europe; 26,000 came from Latin America; and another 325,000 came from the rest of the world (including the Middle East and Africa).
17. Of the 8.8 million total visitors who came to Hawai'i in 2016, 8.2% of them (more than 720,000) came to visit family and friends here. Of the 325,000 visitors who came to Hawai'i in 2016 from the areas of the globe that include

the Middle East and Africa, 12.3% of them (nearly 40,000) came to visit family and friends here.

18. Our data shows that in 2015, Hawai'i hosted more than 8.5 million visitors by air. Of these over 8.5 million visitors, approximately 5.3 million visitors came from elsewhere in the United States; 1.5 million came from Japan; 512,000 came from Canada; 393,000 came from other Asian countries; 399,000 came from Oceania (including Australia and New Zealand); 145,000 came from Europe; 28,000 came from Latin America; and another 290,000 came from the rest of the world (including the Middle East and Africa).
19. Of the 8.5 million visitors who came to Hawai'i in 2015, 8.4% of them (more than 717,000) came to visit family and friends here. Of the 290,000 visitors who came from the areas of the globe that include the Middle East and Africa, 11.9% of them (around 34,000) came to visit family and friends here.

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

Executed on 6 of October, 2017, in Honolulu, Hawai'i.

  
George Szigeti

DECLARATION OF LUIS P. SALAVERIA

I, LUIS P. SALAVERIA, do declare and would competently testify as follows.

1. I am the Director of the State of Hawaii Department of Business, Economic Development and Tourism (DBEDT). I have held this position since December 2014. Prior to this position, I served as the State's Deputy Director of Finance from 2011 to 2014.
2. As Director, I lead DBEDT's efforts to achieve a Hawaii economy that embraces innovation and is globally competitive and dynamic, providing opportunities for all Hawaii's citizens.
3. Through our attached agencies, we also foster planned community development, create affordable workforce housing units in high-quality living environments, and promote innovation sector job growth.
4. In my professional experience working for and promoting Hawaii, the ability for government and business leaders to travel to each other's respective countries is critical to maintaining Hawaii's tourism economy and to expand our local economy's potential beyond tourism.
5. The networking and trust-building that occurs as a result of travel is not something that can be replicated through phone calls, emails, or video-conferences. Meaningful relationships between government agencies,

private businesses, and community organizations are best accomplished through direct interaction and face-to-face engagements.

6. I have recently traveled to Japan, Korea, and the Philippines to explore opportunities for collaborative engagements in renewable energy and to discuss Hawaii's renewable energy laws.
7. As a result of my trip to the Philippines, a delegation from that country came to Hawaii to participate in our annual Clean Energy Summit. They also participated in one of our business start-up accelerator programs and invested funds into the program. This outcome would not have been possible if not for the willingness of these individuals to travel to Hawaii.
8. The State of Hawaii maintains a number of sister-state relationships with countries throughout world. Countries such as China, Indonesia, Japan, Philippines, and Taiwan are partners to Hawaii in this global economy, and these relationships are integral to maintaining Hawaii's position as a global destination and place of business. The ability to interact with these countries without concern of impeded travel by individuals from those countries is crucial to these relationships.
9. Through news coverage and through conversations with others in state government, I am aware that on January 27, 2017, President Donald Trump signed an Executive Order entitled "Protecting the Nation from Foreign

Terrorist Entry Into the United States.” It is my understanding that this first executive order temporarily barred entry into the United States of any citizens of any one of six countries: Iraq, Iran, Somalia, Sudan, Libya and Yemen, and barred indefinitely entry into the United States of any citizens of Syria.

10. I am also aware that a great deal of confusion and inconsistent implementation occurred as the first executive order was placed into effect nationwide. I am aware of the news coverage regarding the first executive order and how its impact was felt around the world and here in Hawaii.
11. I am aware that on March 6, 2017, President Trump issued a second executive order. This order temporarily banned travel from six Muslim-majority countries, and did not apply to legal permanent residents or certain other limited and narrow categories of non-citizens. I am also aware that the second executive order was issued after weeks of speculation and uncertainty, after the federal government had represented on February 16, 2017 that a new order would be issued in the near future.
12. Based on my professional experience, it is my opinion that the first two executive orders impaired Hawaii’s relationships with foreign countries. Hawaii has millions of visitors annually from all over the world. Given the instability the first two executive orders caused to international travel



generally, Hawaii's reputation as a place of acceptance, hospitality, and cultural diversity, was negatively impacted. It is also my opinion that the first two executive orders may have resulted in visitors who would have chosen to visit Hawaii to look instead at other destinations where travel was not impeded.

13. I am aware that on September 24, 2017, President Trump issued a new executive order. This order identifies seven countries – Iran, Libya, Syria, Yemen, Somalia, Chad, and North Korea – whose nationals are either banned entirely or severely restricted from entering the United States. Almost all business and tourist travel is banned from these countries. Certain government officials from an eighth country – Venezuela – are banned from entering the United States. It is my understanding that the new executive order has no time limitation and that the persons from these eight countries who are barred from entry into the United States are barred indefinitely. It is also my understanding that the bar to travel to the United States in the new executive order applies regardless of whether the person in question poses a specific threat of violence or any connection to terrorist activities in any way.
14. In my experience as DBEDT director, Hawaii has always been viewed as a place of acceptance, hospitality, and cultural diversity. Any action that jeopardizes that reputation has the ability to do significant harm to our State's

brand. For many of our visitors, Hawaii is a vacation destination, and people generally take vacations to places where they feel welcome, invited, and safe.

15. Hawaii's financial and business interests in its tourist economy, and its well-earned reputation and brand as a place of welcome, inclusivity, and tolerance, are presently being threatened by the new executive order.
16. In addition to being a tourist destination, Hawaii has been positioning itself for many years as a hub of international business, located midway between Asia and the continental United States. In my time in state government, I have witnessed and been part of efforts to attract business and financial investments to Hawaii by emphasizing our inclusiveness and diversity. I believe that the new executive order causes current and clear harm to this reputation and may negatively impact Hawaii's ability to attract future investments from countries that are not currently named in the new executive order.
17. In my professional travel experience working to expand Hawaii's businesses, I have learned how important it is that Hawaii maintain its reputation as a place of inclusivity and welcome. I believe the new executive order is presently undermining this reputation.
18. It is my opinion that the new order also has the potential to do even more harm to Hawaii than the two prior executive orders because the new order is

of an indefinite duration and affects more regions of the world. A permanent ban on entry to the United States will adversely impact the image Hawaii has on people from the regions of the world where this order applies. The order may, therefore, inhibit travel to Hawaii and other parts of the United States from countries well beyond the eight countries whose nationals are banned from entry to the United States.

19. This anticipated negative effect of the new executive order on visitors to Hawaii is consistent with aggregate data showing how the first two travel bans depressed visitors from the Middle East to the United States as a whole. A recent study by Politico (available at <http://www.politico.com/interactives/2017/trump-travel-ban-muslim-visa-decline/>) found that during the six month period from March 2017 through August 2017 (while the second executive order was in effect), the number of visas issued to visitors from the six countries affected by the second order fell 44 percent compared to the prior year. And, the study also found that the number of visitor visas issued to people from all Arab countries fell 16 percent compared to the prior year, even as the number of visas issued to people from all nations remained unchanged. This data shows that visitors from the Middle East are simply choosing to not come to the United States at all because of the President's travel bans. The effect of trends like this on Hawaii is particularly



problematic because of Hawaii's significant economic interests in its tourist economy and its efforts to position itself as a hub of international business.

20. At this point it is difficult to determine with precision how all of the effects of the new executive order will play out for Hawaii's air travelers.

Nevertheless, Hawaii is uniquely positioned geographically, in the middle of the Pacific Ocean. For the vast majority of our visitors, flying is the only way to travel here.

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

Executed on the 6<sup>th</sup> of October, 2017, in Honolulu, Hawaii.



A handwritten signature in black ink, appearing to read 'Luis P. Salaveria', is written over a horizontal line. The signature is stylized and cursive.

Luis P. Salaveria

**DECLARATION OF HAKIM OUANSAFI**

I, HAKIM OUANSAFI, do declare and would competently testify as follows.

1. I am the Chairman of The Muslim Association of Hawaii, Inc. (“MAH”). I have held this position for approximately 15 years. I have been in the United States since 1986 and a resident of Hawaii since 1998.
2. I have personal knowledge of the matters set forth in this declaration.
3. I am aware that on September 24, 2017, President Trump issued a proclamation (“EO-3”) that bars from the U.S. millions of people from Muslim-majority countries Chad, Iran, Libya, Syria, Yemen, and Somalia, as well as people from North Korea and Venezuela.
4. The MAH is a non-profit entity incorporated under the laws of the State of Hawaii. It is the only formal Muslim organization in the State of Hawaii serving Muslims statewide. Dr. Elshikh, a plaintiff in this case, is the Imam (minister) of the Association.
5. The Association serves approximately 5,000 Muslims, with approximately 4,500 of them on Oahu and 500 on the other islands. The Association runs the Mosques on Oahu, Kauai and Maui.
6. We hold Friday prayer gatherings at the above referenced Mosques every week. Typically, 300-400 Muslim worshipers attend the Oahu Mosque each week. I attend every prayer gathering except when I am traveling.

7. As Chairman of the MAH, I am the official contact person for any matters affecting the Association and the Muslim community.
8. Having lived in Hawaii for nearly 20 years, with much of that time as Chairman of the Association, I have come to know our members well.
9. It is part of my responsibility as Chairman to greet any newcomers and visitors to our Association. Through such interactions, I generally come to learn the circumstances under which our worshipers not already from Hawaii have come to be in Hawaii, whether for the long-term or short-term.
10. As Muslims, it is part of our religious practice, and our Holy text, to visit each other to connect with our Islamic brothers and sisters. Verses of the Noble Quran and various Hadeeth of the Prophet call strongly for the upholding of kinship ties and encourage this by offering worldly and religious rewards. EO-3 will interfere with this religious exercise by preventing Muslims from the affected countries from coming to Hawaii to visit their family members, the majority of whom are American citizens, and consequently interfere with these families' ability to fulfill this specific religious requirement.
11. Over the last decade the Association has continually drawn on new arrivals to Hawaii from Middle Eastern and African countries to add to our community of worshipers, including persons immigrating as lawful permanent residents

and shorter-term visitors coming to Hawaii for business, professional training, university studies, and tourism.

12. New arrivals who decide to reside in Hawaii automatically become members of the Association and include, in the last decade, foreign-born individuals from Syria, Somalia, Iran, Yemen, and Libya who are now naturalized U.S. citizens or lawful permanent residents.
13. EO-3, however, will make it more difficult for the Association to have new members from the affected countries in the future. If people from the affected countries cannot come to Hawaii, they cannot become members of the Association.
14. EO-3 will deter our current members from remaining in Hawaii because they cannot receive visits from their family members and friends from the affected countries if they do. I personally know of at least one family who made that difficult choice and left Hawaii and know of others who have talked about doing the same.
15. EO-3 will harm the members of our Association who do remain in Hawaii because they cannot receive visits from their family members and friends from the affected countries. I am aware of a few families who are directly affected by this EO.

16. The travel bans are affecting travel from other Muslim-majority countries, and not just those designated by the ban. I am aware of four families from Morocco who canceled plans to come to Hawaii because they were afraid that they might become subject to the travel bans in the future, or be discriminated against because of their faith.
17. I am also aware of at least one family of four who was told by the embassy in Morocco in early August 2017 that their visitor visa has been approved and requested passports. The family purchased non-refundable tickets to Hawaii but unfortunately and as of the date of this statement, the visa was not granted and the embassy still holds their passports.
18. With EO-3 in place, the Association's membership will likely decrease over time, which will negatively impact the ability of the Association to continue to serve the Muslim community in Hawaii. By systematically – and indefinitely – banning people from the affected countries, EO-3 will harm the ability of Muslims in Hawaii to continue to worship together.
19. The Association's only source of income is from charitable contributions from its members and from visitors to the Mosque to support its operations. The likely decrease in the Association's membership and in visitors due to EO-3 will harm the Association's finances.

20. The anti-Muslim animus underlying EO-3 and the two travel bans before it inflicts a stigmatic harm on our members. We are being made to feel by our own government like we are less than other Americans because of our religion. The travel bans have led to an increase in violence, threats of violence, harassment, and verbal insults against Muslims in Hawaii. I strongly believe that increased acts of hatred, insults, threats and violence in the United States including Hawaii are the result of the President's statements about Muslims and Islam.
21. Our children and their parents are living in fear because of the travel bans. That fear has led to, by way of example, children wanting to change their Muslim names and parents wanting their children not to wear head coverings to avoid being victims of violence. Some of our young people have said they want to change their religion because they are afraid to be Muslims.
22. There is real fear within our community especially among our children and American Muslims who were born outside the United States because we take very seriously the countless words and statements by President Trump that threaten us and our religion, including his call for a Muslim ban, his pledge to kick out all Syrian refugees, and his statements that he would look into the idea of closing Mosques in the United States and creating a Muslim database.

23. The ban is cruel and arbitrary. If our loved ones happen to be from one of the affected countries, we are unable to have them visit us to celebrate important events or to grieve losses with us, while our neighbors whose loved ones are from non-affected countries do not suffer the same harm.
24. Especially because it is permanent, EO-3 has—even more than its predecessor bans—caused tremendous fear, anxiety, and grief for our members.

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

Executed on October 9, 2017, in Honolulu, Hawaii.

  
Hakim Ouansafi