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

8 STATE OF WASHINGTON

9 Plaintiff,

10 v.

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

17 Defendants.

No.

DECLARATION OF EMILY  
CHIANG

18 I, Emily Chiang, declare as follows:

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

21 2. I am the Legal Director of the American Civil Liberties Union of Washington  
22 (“ACLU-WA”).  
23

DECLARATION OF EMILY CHIANG - 1

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

9 EXECUTED on 30th day of January, 2017.



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