

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS**

ARGHAVAN LOUHGHALAM and  
MAZDAK POURABDOLLAH TOOTKABONI

*Plaintiff-Petitioners,*

FATEMEH YAGHOUBI MOGHADAM,  
BABAK YAGHOUBI MOGHADAM,  
ALI SANIE, ZAHRASADAT MIRRAZI  
RENANI, LEILY AMIRSARDARY, and  
OXFAM AMERICA, INC.

*Plaintiffs,*

and

No.17.cv-10154-NMG

COMMONWEALTH OF MASSACHUSETTS  
and UNIVERSITY OF MASSACHUSETTS,

*Plaintiff-Intervenors,*

v.

DONALD TRUMP, President of the United  
States; U.S. DEPARTMENT OF HOMELAND  
SECURITY (“DHS”); U.S. CUSTOMS AND  
BORDER PROTECTION (“CBP”); JOHN  
KELLY, Secretary of DHS; KEVIN K.  
MCALEENAN, Acting Commissioner of CBP;  
and WILLIAM MOHALLEY, Boston Field  
Director, CBP,

*Defendants.*

**DECLARATION OF GLEN S. LEROY**

I, Glen S. LeRoy, hereby declare and affirm,

1. I hold the Presidency at The Boston Architectural College, which is located in Boston, Massachusetts. I have been employed at The Boston Architectural College in this capacity since September 1, 2015. I serve as the institution’s chief executive officer.

2. I have personal knowledge of the matters set forth below, stemming from information gathered by the BAC’s office of Enrollment Management.

3. The Boston Architectural College is a private, not-for-profit institution of higher education located in the Back Bay neighborhood of Boston which provides professional degrees in architecture, interior architecture, and landscape architecture as well as non-professional degrees in design studies. We employ a staff of 110 and enroll a student body of 703 students, both fully matriculated and in continuing education programs. The mission of the BAC is to provide “excellence in design education emerging from practice and accessible to diverse communities.” The BAC is unique as a fully open-admission professional school providing a pathway to licensure for all with a passion for design and the commitment to succeed. The BAC is also the only design school in the US that requires its students to work concurrently while they study, allowing practice-based learning to fully permeate the classroom experience. In furtherance of our mission of inclusivity, the BAC’s Gateway Program partners with hundreds of community-based organizations providing *pro bono* design services that would otherwise be unavailable.

4. For the current spring semester, the BAC has enrolled 10 individuals from the countries referenced in the January 27, 2017, Executive Order entitled “Protecting the Nation from Terrorist Entry into the United States,” namely: Syria, Iraq, Iran, Somalia, Sudan, Libya, and/or Yemen (the “affected countries”). These 10 students include individuals who are lawful permanent residents or who have immigrant or non-immigrant visas or status.

5. Specifically, 3 students from Iran (2 permanent residents and 1 F1 visa), 1 student from Iraq (permanent resident), 2 students from Somalia (both permanent residents), 1 student from Sudan (F1 visa), 2 students from Syria (1 permanent resident, 1 F1 visa), and 1 student from Libya (F1 visa).

6. The effect of the Executive Order on these students has been devastating. Students are uncertain about their ability to remain in the country, and many have been forced to cancel plans to return home for spring break out of fear that they will not be permitted to return to the BAC to finish their degrees. Indeed, these students have been reaching out to faculty and staff for assistance in clarifying their situation, noting the stress this has placed on them as they look to finish their studies while coping with the feelings of distress and alienation caused by the Executive Order. The BAC as an institution has done its best to respond to these students' needs, but given the lack of clear information and apparent confusion on the part of the relevant officials, we are limited to suggesting that students forgo planned travel outside the US, and stressing to the affected students that they are, indeed, welcome as vital members of the BAC community.

7. In addition to the distress caused to individual students, the BAC itself has been negatively impacted by the Executive Order. Current students from affected countries are now forced to reconsider the viability of remaining at the BAC. Those students currently represent approximately 2% of the BAC's yearly revenue. Worse still, students from countries currently not impacted by the Executive Order have begun questioning the desirability of remaining enrolled in a US school. For example, just yesterday we had a student from South Korea write in to ask if it was safe to travel home for the upcoming spring break. International students currently make up 32% of the BAC's enrollment, up 130% over the past 4 years. A loss of these vital members of the BAC community would result not only in a blow to the diversity on which we were founded, but could result in the closure of the school due to lost revenue and decline in the quantity and quality of our admission pool.

8. The BAC is working to develop contingency plans to aid our international students, including engaging lawyers and other immigration experts to advise students of their rights and options. We have come together as a community to show support for all of our students, and have begun to recommend that impacted students drop their attendance in international travel opportunities. While these travel opportunities are deeply enriching components of the BAC's curriculum, we feel it is too risky to encourage international students to partake, and will instead explore the possibility of developing some domestic opportunities for students from affected countries.

9. The short term costs of this disruption and uncertainty amounts to the loss of up to 2% of the BAC's revenue, as well as considerable faculty and staff time spent mitigating the negative effects of the Order on the overall student (and faculty/staff) population.

10. The potential long-term implications of this Order could be disastrous. The chilling effect that has already occurred among members of our international community not currently affected by the Order could represent a loss of up to 38% of the BAC's yearly revenue. This chilling effect could also negatively impact or ability to recruit students internationally, crippling our efforts to foster diversity and threatening the BAC's very existence.

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

  
Glen S. LeRoy

Executed this 2<sup>nd</sup> day of February, 2017