

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Rashid Ahmed Gibril Ali,

on behalf of themselves and others similarly
situated,

Petitioners,

v.

Case No. 1:17-cv-00480

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 JAMES T. MADDEN, New York Field Director, CBP.

Respondents.

I, Rashid Ahmed Gibril Ali, declare, pursuant to 28 U.S.C. § 1746 and subject to penalty of perjury, that that following is true and correct:

1. My name is Rashid Ahmed Gibril Ali, and I am a citizen of Sudan. I am working in Saudi Arabia for a medical simulation company named I-Man Healthcare. I applied for admission to the United States at the Orlando International Airport, in Orlando, Florida on January 28, 2017. I applied for admission as a nonimmigrant on the basis of my B-1/B-2 visa, which I received on January 4, 2017.
2. On January 28, 2017, I embarked on a flight from Dubai, United Arab Emirates with a final destination of Orlando, Florida. For the first leg of my flight, I had embarked on a flight from Riyadh, Saudi Arabia to Dubai, United Arab Emirates on January 27, 2017. I arrived at Orlando International Airport at around 10:00AM the morning of January 28, 2017.

3. I traveled to the United States to attend a medical education conference in Orlando for four days. The conference, entitled “Patients: The Heart of Simulation,” was held by the Society for Simulation in Healthcare (SSH) at the Hyatt Regency Orlando Hotel, at 9801 International Drive, Orlando, Florida. I am a member of SSH, an organization for medical simulation. As a member of this organization, I came there to attend the conference, attend some workshops, and meet other companies as a representative of my company. The pre-conference workshops would start on January 28, 2017, the conference itself would start on the January 30, 2017, and the conference would end on February 2, 2017. I had a flight back on February 5, 2017.
4. Upon my arrival at the Orlando International Airport, I went through passport control, and the United States officers took me to another room and told me to wait there. They took other passengers who were with me as well. I remember there was a family from Sudan, with a wife, husband, and a child; a Syrian family, including a wife, husband, and two daughters; and two individuals from Iran, a daughter and father. The officers did not tell us anything about how long we would be detained or why we were being detained. We were not allowed to use our cell phones.
5. After about five or more hours, United States officers then came and told us that our visas had been revoked. They were uniformed and may have been with U.S. Customs and Border Protection (CBP), but I could not tell the difference between CBP and other United States government officers. They gave us two choices: we

- could either volunteer to leave or refuse. If we refused, we would be deported from the United States.
6. I asked the officers why my visa was revoked and they did not answer. They were very clear that they were only giving us only two choices, and so I did not even think that I could see a lawyer. In both choices offered, the result was going back, so I accepted the fact that I could not enter the United States. They made me sign a piece of paper that acknowledged that my visa was cancelled.
 7. After I signed the papers, the officers asked us many personal questions, including where we are working, our home address, and information about our family. They had us sign that the information we gave was correct, and they then took our fingerprints. We then waited for another few hours.
 8. In total we were detained for about ten or so hours at the airport.
 9. CPB then put us on the flight to Frankfurt. They initially told me that I would not have to pay for the flight, but it turns out that they were using my return plane ticket for which I had already paid. CBP and the airlines refused to give me back my passport. They only returned my passport after the plane leaving the United States touched down. I received my passport in Dubai Airport.
 10. We boarded the flight to Frankfurt airplane at about 8:00PM on January 28. My boarding pass says that boarding started at 7:50PM. My flight was LH0465 on Lufthansa Airlines to Frankfurt, Germany. The flight did not take off for a while, as it was a little bit delayed. I do not remember the exact time that the flight left, but it was after 8:30pm.

11. From Frankfurt, Germany I went to Dubai, and then I returned to Riyadh.

Executed this sixth day of February, 2017, at Riyadh, Saudi Arabia.

A handwritten signature in blue ink, appearing to be 'Rashid', written in a cursive style.

Rashid Ahmed Gibril Ali