

Honorable James L. Robart

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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 STATE OF WASHINGTON,

12 Plaintiff,

13 v.

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

21 Defendants.

No. 2:17-cv-00141

SECOND DECLARATION OF EMILY
CHIANG

22 I, Emily Chiang, declare as follows:

23 1. I am over the age of eighteen, am competent to testify to the matters below, and
24 make this declaration based on personal knowledge.

25 2. I am the Legal Director of the American Civil Liberties Union of Washington
26 (“ACLU-WA”).
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1 3. I oversee and administer the Legal Department of the ACLU-WA, including all
2 active litigation and intake.

3 4. Since the President signed his Executive Order on January 27, 2017, we have
4 received numerous calls and emails from individuals affected by the Order. Some of those
5 communications are described in the first declaration I filed in this matter.

6 5. One citizen residing in Washington contacted the ACLU-WA to express that the
7 ban was obstructing her ability to reunite with her husband and her stepdaughter, who after two
8 years of vetting had obtained CR-1 and CR-2 visas to join her in Washington. Her husband and
9 stepdaughter are from Iran. She fears that the ban will force her to leave the United States to
10 start a life with her family elsewhere. She is torn between her husband and stepdaughter, who
11 are banned from entering the United States, and her ailing mother, who is unable to travel.

12 6. A United States citizen and her husband, a Syrian citizen who holds a CR-1 visa,
13 who are currently in Europe after finishing graduate education programs. They had planned to
14 return to the United States in early February 2017, but now fear that they will be denied entry to
15 the United States and will be unable to reunite with their family, all of whom live in Washington.
16 They are uncertain where they will work or live because their work contracts have ended and
17 they moved out of their residence in anticipation of their return to the United States.

18 7. Another individual called seeking legal help for his brother, who had a flight from
19 Canada arriving at Seattle-Tacoma International Airport at the end of January 2017. His brother
20 holds an Iranian passport but is a Canadian permanent resident and had obtained a work visa to
21 join his family in the United States.

22 8. One individual contacted the ACLU-WA regarding her ailing mother, who is a
23 legal permanent resident but has been undergoing cancer treatment in Iraq, where it is less
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1 expensive. Her mother's health has improved and she had hoped that her mother could rejoin
2 her in the United States. She had planned to travel abroad in two weeks to visit her mother and
3 bring her home to the United States, but due to the ban she is fearful that they will be denied re-
4 entry because they were both born in Iraq. Her fear is compounded by her concern for her young
5 daughter, who planned to stay behind in Washington and would be entirely alone if her mother
6 and grandmother were unable to return.
7

8 9. A Syrian refugee family currently residing in Washington reached out to the
9 ACLU-WA to seek help for their son, daughter, and son-in-law who had obtained the necessary
10 approval to rejoin their family in Washington on January 30, 2017. They were turned away at
11 the airport in Turkey due to the Order. They had already given up their housing and employment
12 in anticipation of their move to the United States. They are from Aleppo, Syria and are afraid to
13 return due to the conflict there, especially given that the daughter is pregnant.
14

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

17 EXECUTED on the 2nd day of February, 2017.

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20 Emily Chiang, WSBA No. 50517
21 ACLU of Washington Foundation
22 901 Fifth Avenue, Suite 630
23 Seattle, Washington 98164
24 (206) 624-2184
25 echiang@aclu-wa.org
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 2nd day of February, 2017, I electronically filed the foregoing
3 document with the United States District Court ECF system, which will send notification of such
4 filing to the following:

5
6 Robert W. Ferguson
7 Marsha J. Chien
8 Anne E. Egeler
9 Patricio A. Marquez
10 Colleen M. Melody
11 Noah Guzzo Purcell
12 Washington State Office of the Attorney
13 General
14 1125 Washington Street SE
15 PO Box 40100
16 Olympia, WA 98504-0100
17 Phone: 360.753.7085 - DD
18 Email: bobf@atg.wa.gov
19 Email: marshac@atg.wa.gov
20 Email: AnneE1@atg.wa.gov
21 Email: PatricioM@atg.wa.gov
22 Email: colleenm1@atg.wa.gov
23 Email: noahp@atg.wa.gov

- via facsimile
- via overnight courier
- via first-class U.S. mail
- via email service agreement
- via electronic court filing
- via hand delivery

24 *Attorneys for Plaintiff*

25 Arjun Garg
26 Michelle R. Bennett
27 US Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave. NW
Washington, DC 20530
Phone: 202-305-8613
Email: Arjun.garg@usdoj.gov
Email: michelle.bennett@usdoj.gov

- via facsimile
- via overnight courier
- via first-class U.S. mail
- via email service agreement
- via electronic court filing
- via hand delivery

28 *Attorneys for Defendants Donald J. Trump,*
29 *U.S. Department of Homeland Security, John F.*
30 *Kelly, Tom Shannon, and United States of*
31 *America*

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27

Angelo J. Calfo
Kristin W. Silverman
Calfo Eakes & Ostrovsky, PLLC
1301 Second Avenue, Suite 2800
Seattle, WA 98101-3808
Phone: 206-407-2200
Email: angelic@calfoeakes.com
Email: kristins@calfoeakes.com

- via facsimile
- via overnight courier
- via first-class U.S. mail
- via email service agreement
- via electronic court filing
- via hand delivery

*Attorneys for Amicus Americans United for
Church and State*

Signed at Seattle, Washington this 2nd day of February, 2017.



Katie Dillon