1 2 3 4 5 The Honorable James L. Robart 6 7 8 UNITED STATES DISTRICT COURT 9 WESTERN DISTRICT OF WASHINGTON 10 STATE OF WASHINGTON, 11 Plaintiff, NO. 2:17-cv-00141-JLR 12 THIRD DECLARATION OF ASIF v. 13 **CHAUDHRY** DONALD TRUMP, in his official 14 capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND 15 SECURITY; JOHN F. KELLY, in his official capacity as Secretary of the 16 Department of Homeland Security; TOM SHANNON, in his official capacity as 17 Acting Secretary of State; and the UNITED STATES OF AMERICA. 18 Defendants. 19 20 I, Asif Chaudhry, hereby declare and affirm: 21 I am the Vice President for International Programs at Washington State 1. 22 University (WSU). I have made further inquiries regarding current applicants to WSU from 23 countries targeted by the Executive Order entitled "Protecting the Nation from Foreign Terrorist 24 Entry Into the United States." Based on those inquiries, I provide the following additional 25 information. I have personal knowledge of the facts set forth in this declaration, and I am 26 competent to testify about them.

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- 2. Several WSU students from targeted countries have had to forego international travel and conference activities related to their research. One student in WSU's College of Agricultural, Human, and Natural Resource Sciences, who is from Iran, was registered for an academic conference in Canada scheduled to take place February 5 8, 2017. His WSU department paid for the conference. The receipt, made out to his department chair, is attached as **Exhibit A**. The department also planned to cover his travel expenses. Due to the executive order, the student was unable to attend the conference.
- 3. WSU currently has one (1) graduate student applicant for the 2017 summer term and fifty-three (53) graduate student applicants for the 2017 fall semester from the countries targeted by the Executive Order. If these students were offered admission and accepted, they would pay a minimum of \$42,216 per academic year in tuition and fees to WSU. If they were unable to obtain visas, were denied entry, or decided that study in the United States was no longer feasible, WSU could lose as much as \$2,279,664 per academic year in revenue.
- 4. In addition, WSU currently has one (1) admitted undergraduate and six (6) undergraduate applications pending for the 2017 fall semester from prospective students from the countries targeted by the Executive Order. These students would pay a minimum of \$41,628 per academic year in tuition and fees to WSU. If these students were unable to obtain visas, were denied entry, or decided that study in the United States was no longer feasible due to the Executive Order, WSU could lose as much as \$291,396 in revenue per academic year.
- 5. Ten (10) of the applicants, graduate and undergraduate, currently are already in the United States.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and complete to the best of my knowledge.

Dated this 9th day of February, 2017.

Asif Chaudhry, Ph.D.

Chaudhry Declaration Exhibit A



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\$ 100.00 / N° d'enr. de taxe Tax Reg. No.:	No	