

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION

EBLAL ZAKZOK, *et al.*,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States, *et al.*,

Defendants.

Civil Action No.: 1:17-cv-02969-GLR

DECLARATION OF JOHN DOE #1

I, [REDACTED], known as John Doe #1 for the purposes of this case, to the best of my knowledge, information and belief, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am a United States citizen, and I am Muslim. I live in New Jersey.
2. I was born on [REDACTED], in Kuwait. I first came to the United States in 1999. I have a Master's Degree in Social Work and Management and Policy from Rutgers University
3. In August 2017, my wife and I, a Syrian national, married in the United States.
4. My wife was born and grew up in Saudi Arabia. She studied dentistry, and is now pursuing a Master's degree in dentistry in Portugal on a full scholarship.

5. Soon after we married, my wife returned to Portugal to continue her studies while I set up our home in New Jersey and prepared to apply for her to come to the United States as an immigrant on the basis of our marriage.

6. I have one child, my nine-year-old stepdaughter. She is my wife's biological daughter, and a Syrian national. My stepdaughter lives in Saudi Arabia with my wife's parents. She is a permanent resident of Saudi Arabia, and her permanent residency status expires in 2018.

7. Our plan is for my wife to immigrate to the United States on an I-130 visa after she completes her master's program and then to apply for derivative benefits for my stepdaughter to join us. We plan to raise our daughter in the United States. It is currently very difficult for me to visit my stepdaughter because of Saudi Arabia's stringent visa requirements.

8. I have not yet applied for an I-130 visa on my wife's behalf. I understand that, if the Proclamation goes into effect, applying for the visa would be pointless and my wife will be barred from joining me in the United States.

9. I have and will continue to suffer emotional, psychological, physical and financial injuries as a result of the Proclamation. I now realize that I may never be joined by my wife in the United States or afforded the opportunity to create the expanded family I envisioned. I have no other family in the United States, and the possibility that my wife may never be able to join me in the United States has left me distraught. Since the Proclamation, I have been anxious, depressed, stressed and feel helpless.

10. The Proclamation imperils my relationship with my wife, whom I love and just married. My wife and I plan to have more children, and the Proclamation will make it difficult or impossible to do so.

11. The Proclamation will also have a significant financial impact on me. If my wife is prevented from immigrating to the United States when she finishes her degree, I will have to support her while she lives abroad. If she is delayed in immigrating to the United States after she finishes her degree, we will suffer her lost wages during that time.

12. I am a practicing Muslim and feel marginalized and excluded by the Proclamation on the basis of my religion. I believe that there are many other countries that do not comply with the protocols that the President has used as a basis for denying entry to citizens of the countries in the Proclamation, but it was my country of ancestry, and that of my wife, that he singled out for the ban because there are many Muslims who live there. I believe that the ban is based on bigotry and hatred, and that it stigmatizes me for being Muslim.

13. It is important for me to remain anonymous in this lawsuit. I am aware of rising anti-Muslim sentiment in the United States, and I fear that the Proclamation and the previous travel bans empower those that discriminate against Muslims. I feel marginalized because other U.S. citizens are not being prevented from having a relationship with their spouse in the way that I am.

14. I am further concerned that revealing my identity will invite harassment or targeting of me in the United States, or my wife in Portugal, on the basis of our religion and national origin. I am also concerned that revealing my identity could

negatively affect the outcome of immigration proceedings for my wife and cause her visa application to be denied in retaliation for this lawsuit.

I declare under penalty of perjury that the foregoing is true and correct. Executed at Hackensack, New Jersey on October 6, 2017.

[REDACTED]