

**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 EBLAL ZAKZOK**

I, Eblal Zakzok, 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 native of Syria. I was born in the countryside outside the city of Aleppo in 1970. I am a lawful permanent resident of the United States, and a practicing Muslim.

2. My wife and I married in 1989 and have five children: Turkie, Mohamad, Razan, Saleh and Rasha, who were born in 1993, 1996, 1999, 2001 and 2008, respectively.

3. I studied civil engineering at Aleppo University in Syria and graduated with a degree in 1994. I thereafter continued my studies at the University of Manchester in the United Kingdom and received my Ph.D. in 2007.

4. After graduating from the University of Manchester, my family and I returned to my hometown in Syria and I accepted a position as an assistant professor at Aleppo University.

5. Upon returning to Syria, I noticed the political conditions deteriorating quickly. While my commute from my home to the university in Aleppo would normally take 45 minutes, between 2008 and 2014 it became increasingly difficult and dangerous to get from my hometown to Aleppo. The Syrian regime and rebel groups set up checkpoints along the road to Aleppo and the road was littered with artillery shells. I saw outbursts of violence and fighting on my way to work each day. By early 2014, it would sometimes take me 6 hours to get to work.

6. On February 22, 2014, I was detained by the Syrian regime on my way to work. I was told that my name appeared on a list of persons critical of the Syrian government. I was detained for two weeks, and kept in an approximately 30 square meter cell. At times there were so many people in the cell that we could not sit or lie down. I was beaten and tortured while in custody, and the overcrowded, unsanitary conditions left me with a painful skin disease that persisted even after my release.

7. On March 9, 2014, I was brought before a judge for a hearing, and the judge dismissed the charges and released me. The judge told me that, as a university professor, I should not be living or traveling around Aleppo.

8. After I was released, my family and I decided it was no longer safe for us in Syria and that we had to leave. At that point, my hometown had been taken over by ISIS.

9. In September 2014, my family and I left Syria and immigrated to Istanbul, Turkey.

10. On September 30, 2014, I traveled to the United States to present a paper at a conference at Eastern Michigan University, to which I had been invited shortly before my family and I left Syria. Although I had a visa to enter the United States for this purpose, I was denied entry upon arrival in Detroit, MI, on suspicion that my intent was to immigrate to the United States. Upon being denied entry, I applied for asylum in the United States. I was detained by immigration services while my asylum application was pending.

11. On December 17, 2014, my asylum application was approved. I stayed with friends in the Detroit area for a few months until the Ohio State University offered me a position as an assistant professor of Surveying, Remote Sensing and Geographical Information Systems, in May 2015. OSU offered me this position as part of The Scholar Rescue Fund of the Institute of International Education, which provides fellowships to academics who are refugees living in the United States.

12. After my asylum application was approved, I applied for derivative benefits for my wife and eligible children. My wife and three of my children were granted these benefits on January 25, 2016 and thereafter joined me in Columbus, Ohio. As refugees, the four of us are lawful permanent residents in the United States. I also have a green card.

13. My eldest son's application for derivative asylum benefits was delayed due to administrative processing but was finally approved on October 4, 2017. We expect he will join us in Ohio shortly.

14. My eldest daughter, Turkie, was not eligible for derivative benefits because she was older than 21 years of age when I was granted asylum in the United States. Therefore, on August 25, 2017, I filed a Petition for Alien Relative, Form I-130, seeking approval for Turkie to immigrate to the United States and be reunited with the rest of my family. The Petition is currently pending with USCIS.

15. It is my understanding that the Presidential Proclamation announced by President Trump on September 24, 2017, which bars all Syrians from entering the United States on either immigrant or non-immigrant visas after October 18, 2017, will prevent my daughter Turkie from receiving a visa to immigrate to or visit the United States indefinitely.

16. My wife and I, as well as our children, are distraught at the possibility that Turkie may never be able to be reunited with us in the United States. I fear for my daughter's safety in Turkey, where I understand Syrian women are specifically targeted by criminals. Further, my daughter is not a permanent legal resident in Turkey and therefore could be required to return to Syria, where I fear she would be subjected to the same torture and persecution that I suffered prior to my family fleeing the country.

17. I currently support Turkie financially. When my family and I fled Syria, Turkie's studies at Aleppo University were interrupted and she has not completed her degree. Although she was accepted to Ohio State University in 2015 to complete her degree in English Literature, and received an exceptional score on her English proficiency exam, she was denied a student visa because the government believes it is her intent to immigrate to the United States permanently. If the Proclamation goes into

effect, it will inhibit Turkie's ability to finish her degree and to obtain gainful employment. It will prevent Turkie from rejoining our family in Ohio where she would live with us and contribute to the household income. It would further require me to continue to supporting her financially, which costs thousands of dollars per month, while she regrettably lives alone without our family in Istanbul.

18. I do not understand why the President is trying to ban people from Syria and other Muslim countries from entering the United States. I feel this is basically an attack on my religion, Islam, and on all Muslims who want to immigrate to this country.

I declare under penalty of perjury that the foregoing is true and correct. Executed at Columbus, Ohio on October 9, 2017.

*Eblal zakzok*

---

EBLAL ZAKZOK