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6 **UNITED STATES DISTRICT COURT**
WESTERN DISTRICT OF WASHINGTON

7 STATE OF WASHINGTON,

8 Plaintiff,

9 v.

DECLARATION OF AYESHA
BLACKWELL-HAWKINS, ESQ.

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

16 Defendants.

17 Pursuant to 28 U.S.C. § 1746(2), Ayesha Blackwell-Hawkins hereby declares as
18 follows:

- 19 1. I am over the age of eighteen and competent to testify.
- 20 2. I am Senior Manager of Mobility and Immigration at Amazon.com, Inc. and its
21 subsidiaries ("Amazon"). I manage the team that is responsible for providing
22 immigration support for employees and their dependent families and ensuring lawful

1 immigration to and from the various countries in which Amazon operates. I have
2 been employed in this capacity since 2009.

- 3 3. Amazon employs more than 40,000 employees in the State of Washington and more
4 than 180,000 employees in the United States. Our employees come to us from every
5 corner of the United States and every corner of the world.
- 6 4. From the very beginning, Amazon has been committed to equal rights, tolerance, and
7 diversity – and we always will be. As we’ve grown the company, we’ve worked hard
8 to attract talented people from all over the world, and we believe this is one of the
9 things that makes Amazon great – a diverse workforce helps us build better products
10 for customers.
- 11 5. The Executive Order, “Protecting the Nation from Foreign Terrorist Entry into the
12 United States, signed by President Trump on January 27, 2017 (the “Executive
13 Order”) immediately – and negatively – impacted employees, dependents of
14 employees, and candidates for employment with Amazon.
- 15 6. Because the Executive Order suspends entry into the United States of “aliens from
16 countries referred to in section 217(a)(12) of the INA, 8 U.S.C. 1187(a)(12)” it is
17 unclear whether it applies to only citizens of identified countries or anyone born in
18 those countries irrespective of their current citizenship or visa status. It is also unclear
19 whether the suspension applies to employees with dual citizenship (in both an
20 identified and non-identified country). In order to comply with the order and to
21 ensure the safety of our employees, we assume the Executive Order covers both
22 scenarios.
- 23 7. Amazon is currently aware of 49 employees born in one of the countries identified in
24 the Executive Order. 47 in that group currently have citizenship in another country.
25 The remaining two employees hold permanent residence in another country. These

1 employees work in the United States lawfully pursuant to J1, H-1B, E-3, TN, LPR
2 and L-1A visas.

- 3 8. One example of an impacted employee is a senior Amazon lawyer who was born in
4 Libya but has been a UK citizen for many years. This employee had plans to travel to
5 the United States for business during the month of February. We have instructed the
6 employee to cancel her plans and remain in the UK rather than risk being denied
7 entry to the United States.
- 8 9. Amazon is also currently aware of 10 dependents of Amazon employees born in one
9 of the countries identified in the Executive Order. These dependents live in the
10 United States lawfully pursuant to H-1B, L-1B, E-3, LPR, F-1 OPT, and TN visas.
- 11 10. We reached out to impacted Amazon employees and dependents and recommended
12 that they refrain from travel outside of the United States until further notice. Further,
13 we have advised any such individuals who are living outside of the United States,
14 with current plans to visit the US for business or personal reasons, to cancel those
15 plans until the entry restrictions are lifted.
- 16 11. Amazon is also currently aware of 7 candidates for employment who have received
17 offers for employment with Amazon. All of these candidates were born in Iran, but
18 are currently citizens of Germany, Canada, and Australia. We are currently assessing
19 alternatives that could include placement in countries other than the United States.
- 20 12. The Executive Order has impacted more than just Amazon employees, dependents,
21 and candidates. Asghar Farhadi, the Iranian director of the film, The Salesman, is
22 similarly prohibited under the language of the Executive Order from attending the
Academy Awards in Los Angeles, where his film is a nominee for Best Foreign Film.
Amazon's subsidiary, Amazon Studios, is the distributor of the film.

1 13. Finally, my team is continuing to receive of inquiries from employees who are not
2 immediately impacted, but who are seriously concerned about their ability to travel
3 and the potential expansion of the Executive Order.

4 I declare under penalty of perjury that the foregoing is true and correct.

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8 Executed this 30th day of January, 2017.

9 s/ Ayesha Blackwell-Hawkins
Ayesha Blackwell-Hawkins, Esq.