

# Exhibit G

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS**

ARGHAVAN LOUHGHALAM and,  
MAZDAK POURABDOLLAH TOOTKABONI

*Plaintiff-Petitioners,*

FATEMEH YAGHOUBI MOGHADAM,  
BABAK YAGHOUBI MOGHADAM,  
ALI SANIE, ZAHRASADAT MIRRAZI  
RENANI, LEILY AMIRSARDARY, and  
OXFAM AMERICA, INC.

*Plaintiffs,*

v.

No.17-cv-10154-NMG

DONALD TRUMP, President of the United  
States; U.S. DEPARTMENT OF HOMELAND  
SECURITY (“DHS”); U.S. CUSTOMS AND  
BORDER PROTECTION (“CBP”); JOHN  
KELLY, Secretary of DHS; KEVIN K.  
McALEENAN, Acting Commissioner of CBP;  
and WILLIAM MOHALLEY, Boston Field  
Director, CBP,

*Defendants.*

**AFFIDAVIT OF RAYMOND C. OFFENHEISER**

I, Raymond C. Offenheiser, being duly sworn, depose and say:

1. I am the President and Chief Executive Officer of Plaintiff Oxfam America, Inc. (“Oxfam”). I submit this affidavit in support of the Amended Petition for Writ of Habeas Corpus and Complaint for Declaratory and Injunctive Relief filed on February 1, 2017 of plaintiffs Fatemeh Yaghouhi Moghadam, Babak Yaghoubi Moghadam, Ali Sanie, Zahrasadat Mirrazi Renani, Leile Amirsardary, and Oxfam America, Inc. to enjoin defendants Donald Trump, U.S. Department of Homeland Security, U.S. Customs and Border Protection, John Kelly, Kevin K. McAleenan, and William Mohalley, from enforcing

President Trump's Executive Order ("EO") of January 27, 2016, which bars entry into the United States by nationals of seven Muslim-majority countries. I make this affidavit based on personal knowledge.

2. Oxfam's principal place of business is in Massachusetts.

3. Oxfam is part of a 19-member confederation of non-governmental development organizations -- Oxfam International -- dedicated to creating lasting solutions to hunger, poverty, and social injustice through long-term partnerships with poor communities around the world, and by responding to life-threatening emergencies. Oxfam and all Oxfam International organizations seek to challenge the structural barriers that foster conflict and human suffering and limit people from gaining the skills, resources, and power to become self-sufficient.

4. Oxfam and its affiliated organizations fund development and humanitarian relief projects in more than 90 countries, collaborating on strategic, long-term efforts to help build strong local organizations that can promote self-sufficiency and alleviate the issues of global poverty. Oxfam and our affiliates advocate for changes in international policies related to trade, conflict, funding for education, development assistance, debt relief and other issues, as well as work to educate and mobilize the public and raise awareness about global poverty.

5. Oxfam operates in five of the seven countries affected by the EO -- all but Libya and Iran. Oxfam's humanitarian mission is crucial in those countries; for example, we are one of the few international non-governmental organizations still allowed to function in Sudan, bringing much-needed relief to displaced populations in Darfur and beyond.

6. Oxfam regularly brings staff members and civil society partners from the affected countries to the United States. These visits are essential for internal purposes, so that our American staff can obtain information from their overseas colleagues that enable the

organization to carry out its activities in the United States. These visits are critical for external purposes as well, as they provide opportunities for people who are intimately familiar with country conditions to bear witness on Oxfam's behalf in direct communications with members of the organization's key American constituencies. This includes speaking to key Congressional constituencies, donors, and potential donors about conditions, and about Oxfam's operations, in those countries, and these efforts are essential for keeping our programs in those countries funded and operational.

7. In addition, Oxfam regularly brings people from the affected countries to the United States to speak with American governmental officials, including lawmakers in the United States' House of Representatives and Senate and members of the executive branch (including representatives of the White House, the Department of State, and the Department of the Treasury) as well as the United Nations' Security Council mission in New York. These meetings and discussions enable Oxfam to educate governmental officials generally about political and humanitarian conditions in the affected countries, and also to answer specific questions helpful in shaping policy and practice with respect to countries where the United States' government often has limited insight because of ongoing conflict.

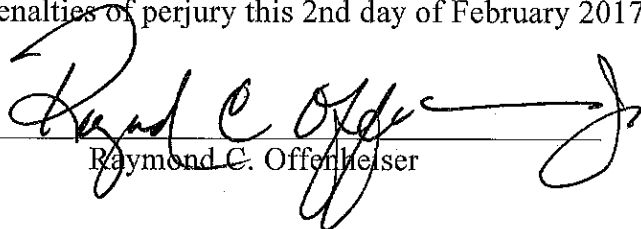
8. Oxfam frequently brings representatives from the affected countries to the United States for this purpose at the request of the governmental officials themselves. For example, just prior to the signing of the EO, we were requested to send our Country Director from one of the listed countries to Washington to brief on a key, time-sensitive issue under consideration across the White House, the Department of the Treasury, and the Department of State. The meeting was to be held within the 90-day period of the visa ban in order to comply with the United States Government's own timeline for action, but that meeting will now be impossible.

9. Oxfam currently expects to bring several other people to the United States from the affected countries within the next 90 days. This includes a representative of one of our Syrian partner organizations, who has been invited to speak to public events in mid-March marking six years since the start of the Syria crisis, to raise awareness and suggest potential solutions to government officials, the media, and the public. Much of this analysis comes from inside besieged areas of Syria where information is extremely difficult to come by and can only be provided securely in person in the United States. Another major component of these meetings surrounds ongoing discussions with Congress and the Department of the Treasury on the exclusion of a growing number of civil society organizations from financial services needed to deliver life-saving aid in Syria.

10. Many people who bear witness on our behalf about their experiences and conditions in their countries must come to the United States to do so because they cannot safely or legally speak publicly at home.

11. Application of the EO will therefore severely impair Oxfam's ability to advocate on its behalf and on behalf of the people Oxfam assists in the developing world. The EO will also prevent Oxfam and our representatives from addressing members of Oxfam's key Executive and Congressional constituencies and responding to specific inquiries made by them, therefore impacting the federal government's ability to properly effectuate foreign policy and programs in areas directly affected by Oxfam's work.

Signed under the pains and penalties of perjury this 2nd day of February 2017.

  
Raymond C. Offenheiser