

# **Exhibit 2**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
SOUTHERN DIVISION**

IRANIAN ALLIANCES ACROSS BORDERS;  
*et al.*

Plaintiffs,

v.

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

Defendants.

Case No. 17-cv-02921-TDC

**DECLARATION OF JANE DOE #1**

Pursuant to 28 U.S.C. § 1746, I, [REDACTED], known for the purpose of this case as Jane Doe #1, hereby declare and state as follows:

1. I am over the age of eighteen years, and I make this declaration based on my own personal knowledge. If asked to do so, I could testify truthfully about the matters contained herein.
2. I am a United States citizen. My spouse and I live in the United Arab Emirates (“UAE”).
3. I came to the United States in 2011 as a refugee fleeing persecution in Iran because of my membership in the Baha’i faith, which is outlawed in Iran.
4. I met my husband in March 2014 through my friendship with his aunt, initially over Skype, and began to pursue a long-distance relationship. He was living in the UAE, where he ran and continues to run his own IT company. We pursued our long-distance relationship and, beginning in 2016, we met in person and I spent significant time with him in UAE. We got

married on February 28, 2016. I continued to go back and forth between the United States and the UAE for the next several months.

5. I became a United States Citizen in January 2017.

6. Shortly after that, I moved to be with my husband in UAE while we await the processing of his application for immigration to the United States. I submitted an I-130 application for him in June 2016. It was approved on September 20, 2017. He is now awaiting his interview, which in the ordinary course would be scheduled in the next few months.

7. Before I came to the UAE to join my husband, I lived in Bethesda, Maryland at

[REDACTED]

8. I want to return to the United States with my husband so that we can live in this area of Maryland again. Before leaving for UAE, I was searching for houses in Maryland so that my husband and I could live there together. I only left the United States so that I could be with my husband while his application is being processed, because I love him and do not want to be apart from him. But the United States is my home and I eagerly await the time that we can return together. The only thing standing between me and my return is the processing of my husband's immigration application.

9. My status in the UAE is temporary and uncertain. My residency there depends on my husband's residency. His residency has to be renewed every 3 years, and is contingent on a renewal of his company's license, which must be renewed each year. The UAE government has the discretion to deny each of these applications for any reason whatsoever. There are restrictions on all aspects of our lives—even down to our ability to open bank accounts. Even if they do continue to renew my husband's residency, there is still no guarantee that they will renew mine. I

do not want to be separated from my husband and am eagerly awaiting the time that we can both return to the United States together.

10. I also understand from friends and other Iranians here that the government of the UAE has become reluctant to renew or issue visas to Iranians, and is attempting to push us out gradually. If my husband is deported to Iran, his life will be at risk. I myself cannot return to Iran, as I fled the country as a refugee. And now that my husband is associated with me and my Baha'i religion, he will be at risk there also.

11. My husband is the sole breadwinner for our family. While he was a bachelor, remaining in this uncertain status in the UAE was easier; but now we are a family and he has greater responsibilities, and the uncertainty of our situation makes him very worried.

12. For all these reasons, we are eagerly awaiting completion of his immigrant visa process, so that we can breathe more easily and come to the United States, where we can settle freely and comfortably and feel like we really belong somewhere and can remain there in a permanent way. I understand that if the Proclamation goes fully into effect, his interview will not be scheduled and he will not be able to obtain an immigrant visa to come to the United States with me.

13. When I learned about the travel ban for persons from Iran, I became extremely anxious and depressed. I am afraid that I will not be able to return to my country, and am being forced to choose between my husband whom I love and my home, United States, to which I cannot wait to return. Our circumstances in UAE are also not permanent, and not settled. If my husband's immigrant visa application is suspended because of the Ban, we will have to remain in very uncertain circumstances and may be forced to be separated from each other.

14. It is important for me to remain anonymous in this lawsuit. I am afraid of losing my status in UAE if my name get associated with this lawsuit. If my husband is forced to return to Iran, his life will be in danger there. And as a refugee, I cannot return to Iran either, and would face significant persecution if I were to return. We are not safe here and we urgently need to come to the United States.

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

Executed on October 5, 2017.

