

# **Exhibit 1**

**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 MANA KHARRAZI ON BEHALF OF IRANIAN ALLIANCES  
ACROSS BORDERS**

Pursuant to 28 U.S.C. § 1746, I, Mana Kharrazi, hereby declare and state as follows:

1. I am over the age of eighteen years. I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon personal information provided to me by others, and I am competent to testify thereto.

2. I am the Executive Director of Iranian Alliances Across Borders. IAAB is a 501(c)(3) nonprofit corporation organized under the laws of the state of New York. I have been the Executive Director at IAAB since 2008. Prior to that, beginning in 2006, I served as a program associate and program director. Before that, I participated in IAAB programs as a student.

3. Because of my position as Executive Director, and my prior involvement with the organization, I know the history and background of IAAB as well as the organization's mission, purposes, and activities. I am also involved in the day-to-day operation of IAAB and am therefore familiar with the organization's current expenses, revenues, and resources. I oversee

programs and activities sponsored or arranged by IAAB and am involved with publications that IAAB distributes.

4. The mission of IAAB is to strengthen the Iranian diaspora community through leadership and educational programming that encourages collaboration and solidarity across various borders and multiple communities. IAAB is a diverse organization, open to members of all religious faiths.

5. I am the only paid staff member of IAAB. Along with myself, our work is done by approximately 50-60 unpaid volunteers each year. We host IAAB's Campus Action Network, a national network comprised of affiliated Iranian-American student groups and representatives, including groups at the University of Maryland College Park, one of the biggest and most active Iranian-American student groups in the nation, and the University of Maryland in Baltimore.

6. We maintain a mailing list of over 2000 individuals, for distribution of our monthly newsletter, and other communications.

7. The travel bans issued in the past year, and the anti-Muslim rhetoric during the campaign, resulted in our organization having to devote significant time responding to members of our community who were subjected to hate speech and intimidation in public places, and/or were otherwise distressed and stigmatized by these events. In response to these reports, we launched the "Reject Hate" campaign to help our members respond to and address targeting and harassment. We worked with parents in our community to provide toolkits for the schools their children attend, presenting positive images of Muslims, Middle Easterners, and South Asians and otherwise guiding parents and educators about how to deal with discriminatory and hateful behavior.

8. The travel bans also affected our educational programs, and the new version of the ban issued on September 24, 2017, excluding, without any time limitation, all Iranian nationals from immigrating to the United States, and most Iranian nationals from traveling to the United States, is likely to affect those programs in the future.

9. Our programs include overnight camps for high school students (Camp Ayandeh, begun in 2006), and middle school students (Camp Javan, begun in 2012). Although primarily attended by Iranian Americans, we have also had campers from Iran and Europe. Since 2010, Camp Ayandeh has hosted campers from outside the United States every year, until the Summer of 2017—the first year that the United States ordered a ban on travel by Iranian nationals. Two applicants to IAAB’s camps from overseas dropped out after the travel ban was ordered.

10. The camps are run by volunteer counselors. There have been counselors from overseas every year until the Summer of 2017. One counselor from Germany, with Iranian roots, worked at the camp in 2016, but did not come back in 2017.

11. At our camps, our workshops address social and cultural issues that challenge all young people, and those that arise from their membership in the Iranian diaspora community. These efforts are described in the recently published book “The Limits of Whiteness: Iranian Americans and the Everyday Politics of Race” by Neda Maghbouleh.

12. In the Summer of 2017, we spent a considerable amount of time at our camps addressing our campers’ feelings of fear, self-hate, and lowered self-esteem arising specifically from the statements made about Muslims and Iranians made during the election, and the imposition of travel bans on Iranians and nationals of other predominantly Muslim countries.

13. Our youth shared stories of feeling discriminated against and described negative experiences in their schools. I led a session about the current climate, including the travel ban

and the representation of our communities in the media. I supported youth who described personal stories about being called a ‘terrorist’ and having to respond about their identities. I supported young teenage boys with traumatic experiences of being subjected to ridicule and harassment on sports teams, by parents of friends, classmates, and teachers. Some youth described feeling unsafe in their communities, sometimes saying they did not want their classmates to know that they are Iranian American. Some shared stories about being harassed for their facial hair, being mocked for their names, not feeling a sense of self-love because their Iranian identity subjected them to being treated differently. I also supported a young group of volunteer counselors who shared similar experiences in college

14. We maintain ongoing relationships with the young people who attend our camps, and their families. Those relationships continue into college, where our camp alumni often become leaders and participants in Iranian-American student groups. Participants in these IAAB activities and relationships consider each other to be family.

15. We created a national Campus Action Network of college and university Iranian-American student groups, known as I-CAN. Through those affiliations, we share resources and ideas, collaborate on various events and actions, provide leadership training, and collaborate on programs. Most years we hold an IAAB Student Summit for I-CAN leaders and other interested participants. We are in the process of scheduling that event for the 2017-18 academic year.

16. Like our middle school and high school students, the college and university students that we interact with have experienced sufficient distress and fear as a result of the election rhetoric and the travel bans. Our organization is spending significant time discussing and planning with these student groups how to respond to these disturbing developments.

17. IAAB periodically holds an International Conference on the Iranian Diaspora where scholars, students, journalists, artists, community leaders and other interested people present papers, participate in panels, and otherwise address issues affecting the Iranian Diaspora community globally. The next conference will take place in on April 21 and 22 at New York University. We are sending out our call for proposals in the coming week or two. If the Proclamation goes into effect, potential participants will significantly be discouraged from applying, and participants who do apply would not be able to obtain visas to attend.

18. At prior conferences, about half the invited speakers come from outside the United States, including from Iran. They often bring other members of their organizations or faculty.

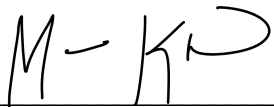
19. At prior conferences, there is always an international presence that includes attendees from outside the United States, including Iran.

20. At prior conferences, we have hosted performers with Iranian national origins from outside the country, including the Iranian rock band, Hypernova.

21. The conference requires substantial advance planning, fundraising, and promotion. We raise money to support travel, and pay honorarium for invited speakers. We assist speakers and other participants with the visa process, providing them any documentation they need to submit their application. Addressing whether the ban applies to individuals outside the country who we wish to invite, or who wish to participate in the conference will require organization resources, and likely require guidance that we do not have the internal capacity to provide. We anticipate that potentially affected individuals will be discouraged from attempting to come to the United States for the conference, in light of the challenges and uncertainty associated.

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

Executed on October 5, 2017.

  
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Mana Kharrazi