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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JEWISH FAMILY SERVICE OF
SEATTLE, et al.,

Plaintiffs,

v.

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

Defendants.

No. 2:17-cv-01707-RSM

DECLARATION OF CASEY SMITH IN
SUPPORT OF PLAINTIFFS' MOTION FOR
A PRELIMINARY INJUNCTION

DECLARATION OF CASEY SMITH

CASEY SMITH, pursuant to 28 U.S.C. § 1746, declares the following under penalty of perjury:

1. I am a paralegal at the International Refugee Assistance Project (“IRAP”). I work under the supervision of IRAP attorneys representing the plaintiffs in the above-captioned case, and I submit this declaration in support of their Motion for Preliminary Injunction.

2. On October 24, 2017, the Presidential Executive Order on Resuming the United States Refugee Admissions Program with Enhanced Vetting Capabilities, Oct. 24, 2017 (“EO-4”), and the accompanying Memorandum to the President from the Secretaries of State and Homeland Security and the Director of National Intelligence (“Memorandum”) announced a 90-

1 day suspension of entry with respect to refugees from the 11 countries subject to Security
2 Advisory Opinions (“SAOs”).

3 3. I understand based on media reports that SAOs are required for refugees from
4 Egypt, Iran, Iraq, Libya, Mali, North Korea, Somalia, South Sudan, Sudan, Syria, and Yemen
5 (“11 SAO countries”). *See, e.g.,* Yeganeh Torbati & Mica Rosenberg, *Under Trump Plan,*
6 *Refugees from 11 Countries Face Additional U.S. Barriers*, REUTERS (Oct. 24, 2017), available
7 at [https://www.reuters.com/article/us-usa-immigration-refugees/under-trump-plan-refugees-](https://www.reuters.com/article/us-usa-immigration-refugees/under-trump-plan-refugees-from-11-countries-face-additional-u-s-barriers-idUSKBN1CT2IV)
8 [from-11-countries-face-additional-u-s-barriers-idUSKBN1CT2IV](https://www.reuters.com/article/us-usa-immigration-refugees/under-trump-plan-refugees-from-11-countries-face-additional-u-s-barriers-idUSKBN1CT2IV).

9 4. According to statistics from the Central Intelligence Agency, the U.N.
10 Development Programme, and the Pew Research Center, 9 of the 11 SAO countries are majority
11 Muslim. *See* Central Intelligence Agency, *Religions*, CIA WORLD FACTBOOK,
12 https://www.cia.gov/library/publications/the-world-factbook/fields/print_2122.html (last visited
13 Nov. 9, 2017); The Pew Forum on Religion & Public Life, *Mapping the Global Muslim*
14 *Population*, PEW RESEARCH CENTER, [http://www.pewforum.org/files/2009/10/](http://www.pewforum.org/files/2009/10/Muslimpopulation.pdf)
15 [Muslimpopulation.pdf](http://www.pewforum.org/files/2009/10/Muslimpopulation.pdf); U.N. Development Programme, *About Sudan*, [http://www.sd.undp.org/](http://www.sd.undp.org/content/sudan/en/home/countryinfo.html)
16 [content/sudan/en/home/countryinfo.html](http://www.sd.undp.org/content/sudan/en/home/countryinfo.html).

17 5. According to the above sources, Muslims make up the below percentages of each
18 country’s population:

- 19 a. Egypt: 90%
- 20 b. Iran: 99.4%
- 21 c. Iraq: 99%
- 22 d. Libya: 96.6%
- 23 e. Mali: 94.8%
- 24 f. Somalia: 98.5% (est.)
- 25 g. Sudan: 97%
- 26 h. Syria: 87%

1 i. Yemen: 99.1%

2 6. I have analyzed data on refugee arrivals via the U.S. Refugee Admissions
3 Program (“USRAP”) from Fiscal Year 2002 through Fiscal Year 2018,¹ issued by the U.S.
4 Department of State’s Refugee Processing Center (“RPC”). The RPC website notes that data
5 collection on resettled refugees by religion began in 2002.

6 7. First, I downloaded data on “MX-Arrivals by Nationality and Religion” from
7 RPC’s Interactive Reporting website. *See* Refugee Processing Center, *Interactive Reporting*,
8 <http://ireports.wrapsnet.org/> (last visited Nov. 9, 2017).

9 8. Specifically, I requested data from the beginning of Fiscal Year 2002 through
10 October 30, 2017 for all religions and nationalities, sorted by nationality. I exported the resulting
11 report (the “arrivals report”) into an Excel spreadsheet. That report is attached hereto as **Exhibit**
12 **A.**

13 9. I labeled the following religious affiliations included in the RPC data as Muslim:
14 Ahmadiyya, Moslem, Moslem Ismaici, Moslem Shiite, and Moslem Suni. Based on similar
15 classifications in a Pew Research Center report, I understand these religious groups to be
16 generally classified as forms of Islam. *See* Philip Conor, Appendix D, *U.S. Resettles Fewer*
17 *Refugees, Even as Global Number of Displaced People Grows*, PEW RESEARCH CENTER (Oct. 12,
18 2017), *available at* [http://www.pewglobal.org/2017/10/12/appendix-d-detailed-religious-](http://www.pewglobal.org/2017/10/12/appendix-d-detailed-religious-affiliation-by-broader-religious-affiliation-u-s-refugees/)
19 [affiliation-by-broader-religious-affiliation-u-s-refugees/](http://www.pewglobal.org/2017/10/12/appendix-d-detailed-religious-affiliation-by-broader-religious-affiliation-u-s-refugees/).

20 10. I labeled the following religious affiliations included in the RPC data as Christian:
21 Baptist, Catholic, Chaldean, Christian, Coptic, Evangelical Christian, Greek Orthodox, Jehovah
22 Witness, Lutheran, Mennonite, Methodist, Oriental Orthodoxy, Orthodox, Pentecostalist,
23 Protestant, Seventh Day Adventist, Ukr Orthodox, Ukrainian Autocephalous Orthodox,
24 Ukrainian Orthodox Kyivan Patriarchate, Uniate. Based on the aforementioned Pew Research
25

26 _____
¹ All data from Fiscal Year 2018 is as of October 30, 2017.

1 Center report, I understand these religious groups to be generally classified as forms of
2 Christianity. *See id.*

3 11. I labeled the following religious affiliations included in the RPC data as Other:
4 Animist, Atheist, Bahai, Buddhist, Cao Dai, Drew, Hindu, Jewish, Kaaka'i, Kirat, No Religion,
5 Other Religion, Sabeans-Mandean, Unknown, Yezidi, Zoroastrian. Based on the aforementioned
6 Pew Research Center report, I understand that these religious groups do not identify as either
7 Christian or Muslim. *See id.*

8 12. Using Microsoft Excel, I analyzed the data from RPC by nationality and religion.
9 I rounded all resulting percentages to the nearest tenth of a percent.

10 13. Between Fiscal Years 2002 and 2018, 339,025 refugees were resettled in the
11 United States from the 11 SAO countries. Of this total:

- 12 a. 338,283, or 99.8%, came from the 9 Muslim majority countries -- Egypt,
13 Iran, Iraq, Libya, Mali, Somalia, Sudan, Syria, and Yemen.
14 b. 742, or 0.2%, came from South Sudan and North Korea, which do not
15 have a Muslim majority population.

16 14. In Fiscal Year 2017, 23,357 refugees were resettled in the United States from the
17 11 SAO countries. Of this total:

- 18 a. 23,169, or 99.2%, came from the 9 Muslim majority countries -- Egypt,
19 Iran, Iraq, Libya, Mali, Somalia, Sudan, Syria, and Yemen.
20 b. 188, or 0.8%, came from South Sudan and North Korea, which do not
21 have a Muslim majority population.

22 15. Out of the 138,710 refugees resettled in the United States in Fiscal Years 2016
23 and 2017, 60,309, or 43.5%, were from one of the 11 SAO countries. Of those:

- 24 a. 59,918, or 99.4%, came from the 9 Muslim majority countries -- Egypt,
25 Iran, Iraq, Libya, Mali, Somalia, Sudan, Syria, and Yemen.
26

1 b. 391, or 0.6%, came from South Sudan and North Korea, which do not
2 have a Muslim majority population.

3 16. Out of the 138,710 refugees resettled in the United States in Fiscal Years 2016
4 and 2017:

5 a. 62,715, or 45.2%, identified as Christian.

6 b. 61,761, or 44.5%, identified as Muslim.

7 17. Of the 60,309 refugees who arrived in the United States from the 11 SAO
8 countries in Fiscal Years 2016 and 2017, 49,442, or 82.0%, identified as Muslim.

9 18. Of the 59,918 refugees who arrived in the United States from the 9 Muslim-
10 majority SAO countries in Fiscal Years 2016 and 2017, 49,429, or 82.5%, identified as Muslim.

11 19. In Fiscal Years 2016 and 2017, 78,401 refugees arrived in the United States from
12 all other countries not subject to SAOs. Of those:

13 a. 55,062, or 70.2%, identified as Christian.

14 b. 12,319, or 15.7%, identified as Muslim.

15 20. Out of the 61,761 Muslim refugees resettled in the United States in Fiscal Years
16 2016 and 2017:

17 a. 80.1% were from the 11 SAO countries.

18 b. 80.0% percent were from the 9 Muslim-majority SAO countries.

19 21. The Memorandum notes that in recent years, the nationalities most represented in
20 the “Follow-to-Join” visa process were Iraqi, Somali, Burmese, Congolese, Ethiopian, and
21 Eritrean. In Fiscal Years 2016 and 2017, 55,125 refugees arrived from those six countries in
22 total. Of those, 34,199, or 62.0%, identified as Muslim.

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

Executed this 9th day of November, 2017.



Casey Smith