

Honorable James L. Robart

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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Juweiya Abdiaziz ALI, et al.,

Plaintiffs,

v.

Donald TRUMP, et al.,

Defendants.

Case No.: 2:17-cv-00135-JLR

**DECLARATION OF JOANNA FISCHER
IN SUPPORT OF PLAINTIFFS**

I, Joanna Fischer, declare under penalty of perjury as follows:

1. I am over the age of eighteen, am competent to testify to the matters below, and make this declaration based on personal knowledge.

2. I am a United States citizen. I live in Rockville, Maryland. I am a paralegal at Feldman And Associates, P.C..

3. I was born in the United States, in 1985, to American parents. I was raised in Wichita, Kansas. In 2015, after turning 30, I decided to travel to Iran as an adventure because I had just turned 30 and my Iranian friends in America had always told me what a wonderful country it was. While I was on this trip, I fell in love with the culture and also with the language, Farsi.

1 4. Upon returning to the United States after the trip, I started to follow Farsi pages on
2 Facebook and Instagram because I wanted to learn the language better. One of the pages was a
3 fitness page for Iranians. I commented on a post there, and a man named Keivan Mokhtarinaseri
4 responded to my post in Farsi. I told him my Farsi was really bad and he offered to teach me the
5 language. We started talking online and I soon fell in love with him.
6

7 5. In early March, 2016, Keivan and I decided to go to Istanbul, Turkey to meet in person
8 after months of talking. We had talked about maybe getting married if the meeting went well
9 enough, and scheduled the marriage for the end of the trip so that we could be sure. Thankfully,
10 after 10 days together, we chose to get married. On March 12, 2016, Keivan and I got married in
11 Istanbul.

12 6. Several months later, we met up again in Kuala Lumpur, Malaysia, after having decided
13 that we wanted to see each other again as soon as possible, after which we would save for the
14 visa petition. On July 29, 2016, I submitted a petition for an immigrant visa for my husband. The
15 petition was approved on August 10, 2016. After paying all of the fees, we were scheduled for a
16 visa interview on January 24, 2017 in Yerevan, Armenia, one of the three U.S. Embassies that
17 processes visas for Iranians.

18 7. On January 24, 2017, both Keivan and I went to Yerevan for the visa. He was
19 interviewed by the consular officer. After the interview went well, we were told that, like most
20 Iranians, Keivan would have to wait for administrative processing. My attorney told me that
21 administrative processing could take weeks or sometimes months, but afterwards Keivan would
22 likely be able to join me.

23 8. On January 27, 2017, President Trump issued the first executive order. Because my
24 husband is from Iran I was terrified that he would not be able to join me. I was informed by my
25 attorney that the visa adjudication had stopped and that I would likely have to wait months
26 longer for my husband to join me. I immediately contacted my local Maryland representatives,
27 including Senator Benjamin Cardin. After the court issued a temporary restraining order, I talked
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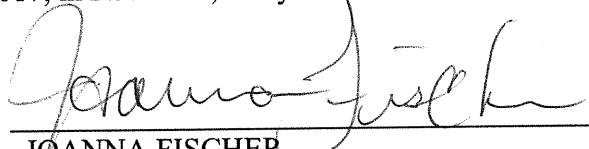
1 with Senator Cardin’s office and they contacted the embassy in Yerevan. They informed me on
2 February 24, 2017 that my husband’s visa is still in administrative processing.

3
4 9. The new executive order will keep my husband and I apart even longer. I am 31 and I
5 suffer from polycystic ovarian syndrome, which makes it very hard to conceive. I am concerned
6 about my fertility because Keivan and I want to have a child together and the longer we are
7 apart, the more difficult it is for me to get pregnant and the more risky any pregnancy would be.

8 10. Because of the possibility that my husband may not be able to join me in months, I have
9 gone so far as to consider whether we can both find jobs in a third country. I don’t want to
10 abandon my life here in the United States, but I fear I might have to if my husband is separated
11 from me for too long.

12
13 I declare under penalty of perjury under the laws of the United States that the foregoing is
14 true and correct to the best of my information, knowledge, and belief.

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16 Executed on this ninth day of March, 2017, in Rockville, Maryland.

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19 _____
20 JOANNA FISCHER
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