

The Honorable James L. Robart

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

John Doe, Jack Doe, Jason Doe, Joseph Doe
James Doe, Jeffrey Doe, individually, and on
behalf of all others similarly situated; the
Episcopal Diocese of Olympia, and the Council
on American Islamic Relations-Washington,

Plaintiffs,

v.

Donald Trump, President of The United States;
U.S. Department of State; Rex Tillerson,
Secretary of State; U.S. Department of
Homeland Security; Elaine Duke, Acting
Secretary of Homeland Security; U.S. Customs
and Border Protection; Kevin McAleenan,
Acting Commissioner of U.S. Customs and
Border Protection; Michele James, Field
Director of the Seattle Field Office of U.S.
Customs and Border Protection; Office of the
Director of National Intelligence; and Daniel
Coats, Director of the Office of the Director of
National Intelligence,

Defendants.

No. 2:17-cv-00178-JLR

DECLARATION OF
LISA NOWLIN IN SUPPORT OF
MOTION FOR PRELIMINARY
INJUNCTION

1 I, Lisa Nowlin, declare as follows:

2 1. I am a Staff Attorney with the American Civil Liberties Union of Washington
3 Foundation (“ACLU-WA”) and co-counsel for Plaintiffs in this case. I have knowledge of the
4 facts set forth herein and could testify competently to them if called upon to do so.

5 2. I have analyzed data on refugee arrivals via the Department of Homeland
6 Security’s Yearbooks of Immigration Statistics for fiscal years 2014 and 2015, the most recent
7 years with complete data. See Yearbook of Immigration Statistics,
8 <https://www.dhs.gov/immigration-statistics/yearbook> (last visited Nov. 22, 2017).

9 3. Table 15 of both Yearbooks contains data on “Refugee Arrivals by Relationship
10 to Principal Applicant and Sex.” Using this the table in Microsoft Excel, I calculated for both
11 fiscal years the percentage of dependent refugees that were children.
12

13 A. In fiscal year 2015, there were 41,520 dependent refugee arrivals. 30,728,
14 or 74%, were children. Of the children, 24,309, or 79%, were children
15 under sixteen.
16

17 B. In fiscal year 2014, there were 39,498 dependent refugee arrivals. 28,119,
18 or 71%, were children. Of the children, 21,370, or 76%, were children
19 under sixteen.
20

21 C. Combining the data, in fiscal years 2014 and 2015, there were 81,018
22 dependent refugee arrivals. 58,847, or 73%, were children. Of the
23 children, 45,679, or 78%, were children under sixteen.

24 4. Using the same table, I calculated for both fiscal years the percentage of
25 dependent refugee spouses who were female.
26

1 A. In fiscal year 2015, there were 10,792 dependent spouse refugee arrivals.
2 8,688, or 81%, were female.

3 B. In fiscal year 2014, there were 11,379 dependent spouse refugee arrivals.
4 9,409, or 83%, were female.

5 C. Combining the data, in fiscal years 2014 and 2015, there were 22,171
6 dependent spouse refugee arrivals. 18,097, or 82%, were female.

7
8 5. Once again using the same table, I calculated the number of dependent refugees
9 that were children under the age of sixteen or female spouses.

10 A. In fiscal year 2015, 24,309 of dependent refugees were children under
11 sixteen and 8,688 were female spouses. Of the 41,520 total dependent
12 refugee arrivals that year, 80% were children under sixteen or female
13 spouses.

14 B. In fiscal year 2014, 21,370 of dependent refugees were children under
15 sixteen and 9,409 were female spouses. Of the 39,498 total dependent
16 refugee arrivals that year, 78% were children under sixteen or female
17 spouses.

18 C. Combining the data, in fiscal years 2014 and 2015, there were 45,679
19 dependent refugee children under sixteen and 18,097 dependent refugee
20 female spouses. Of the 81,018 total dependent refugee arrivals in fiscal
21 years 2014 and 2015, 79% were children under sixteen or female spouses.
22
23

24 6. I have also analyzed data on refugee arrivals processed in Kenya and Thailand via
25 the Department of State's Bureau of Population, Refugees, and Migration data. *See* Refugee
26

1 Arrivals by Processing Country, http://content.12news.com/document_dev/2016/04/15/3a-
2 [mapglobal-refugee-destinations_1652923_ver1.0.pdf](http://content.12news.com/document_dev/2016/04/15/3a-mapglobal-refugee-destinations_1652923_ver1.0.pdf) (last visited Nov. 22, 2017).

- 3 A. For the period of October 1, 2015 through March 31, 2016, the report
4 indicates that 29,055 individual refugees arrived in the United States.
5
6 B. Of that number, 2,822 were processed in Kenya and 1,858 were processed
7 in Thailand.
8
9 C. The two countries combined processed 4,680 individuals, or
approximately 16.1% of all refugee arrivals.

10 I declare under penalty of perjury under the laws of the state of Washington that the
11 foregoing is true and correct and that this declaration was executed on November 22, 2017, at
12 Seattle, Washington.
13

14
15 By: s/Lisa Nowlin

16 Lisa Nowlin, WSBA No. 51512
17 ACLU OF WASHINGTON FOUNDATION
18 900 Fifth Avenue, Suite 630
19 Seattle, Washington 98164
(206) 624-2184
inowlin@aclu-wa.org

20 *Attorney for Plaintiffs*
21
22
23
24
25
26