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I - DECLARATION OF AMIR MESHAL
In Support of Plaintiffs' Cross-Motion for Partial Summary Judgment and
In Opposition to Defendants' Motion for Partial Summary Judgment

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In Support of Plaintiffs' Cross-Motion for Partial Summary Judgment and
In Opposition to Defendants' Motion for Partial Summary Judgment

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

AYMAN LATIF, *et al.*,

Plaintiffs,

v.

ERIC H. HOLDER, JR., *et al.*,

Defendants.

Case No.: 10-cv-750 (BR)

**DECLARATION OF
AMIR MESHAL
IN SUPPORT OF PLAINTIFFS'
PARTIAL CROSS-MOTION
FOR PARTIAL SUMMARY
JUDGMENT AND IN
OPPOSITION TO DEFENDANTS'
MOTION FOR PARTIAL
SUMMARY JUDGMENT**

I, Amir Meshal, hereby declare and state as follows pursuant to 28 U.S.C. § 1746:

1. I submit this declaration based on my personal knowledge in support of Plaintiffs' cross-motion for partial summary judgment and in opposition to Defendants' motion for partial summary judgment in the above-captioned case. I am a U.S. citizen. I was born and raised in New Jersey.

2. I currently live in Minnesota, where I work as a bus driver.

3. Prior to June 9, 2009, I flew for years without any problems. I flew to visit family in other parts of the United States and abroad.

4. In the spring of 2009, I planned to travel from New Jersey to Orange County, California to visit friends.

5. On June 9, 2009, I was denied boarding on my flight to Irvine, California at Newark International Airport. Approximately thirty uniformed and plainclothes officers

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In Support of Plaintiffs' Cross-Motion for Partial Summary Judgment and
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surrounded me at the check-in counter. One officer identified himself as an FBI agent and informed me that I am on a government list that prohibits me from flying. I felt humiliated that everyone in the airport could see that I was denied boarding on my flight. I felt like I was being treated like a suspected terrorist.

6. In October 2010, FBI agents offered me the opportunity to serve as a government informant in exchange for assistance in removing my name from the No Fly List. One agent told me: "If you help us, we can help you off of the No Fly List."

7. My placement on the No Fly List has prevented me from traveling to be with my family in California, New Jersey, and other locations of the United States that are far away from Minnesota. I have no practical means of traveling to these locations without flying. Such lengthy journeys would incur prohibitive costs for food, gas, lodging and lost income during the multiple days it would require to drive or to travel by bus or train.

8. Because I am on the No Fly List, I cannot travel to Egypt, where my mother and extended family lives. Such a journey would be prohibitively expensive. It would also jeopardize my job because even a one-way trip would take weeks, and I do not have sufficient leave time from work. I also fear that such a journey would put me at risk of interrogation and detention by foreign authorities because I would have to travel through other countries to get from Minnesota to Egypt.

9. I have no idea why the government has put me on the No Fly List. I have never been charged, indicted, or convicted of a terrorism crime in a U.S. or foreign court. No government official has ever told me why I was denied boarding or why I would be included in the No Fly List. Because of this, I simply do not know how to explain that I should not be on the

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In Support of Plaintiffs' Cross-Motion for Partial Summary Judgment and
In Opposition to Defendants' Motion for Partial Summary Judgment

No Fly List, or what information I should provide in my defense.

10. I do not pose a threat to civil aviation or national security. I would be willing to undergo any suitable screening procedures in order to be permitted to board planes.

11. I declare and state under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on March 21, 2013


AMIR MESHAL