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**1 - DECLARATION OF MOHAMED KARIYE**

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

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2 - DECLARATION OF MOHAMED KARIYE  
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  
MOHAMED SHEIKH  
ABDIRAHMAN KARIYE IN  
SUPPORT OF PLAINTIFFS'  
CROSS-MOTION FOR PARTIAL  
SUMMARY JUDGMENT AND IN  
OPPOSITION TO DEFENDANTS'  
MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

I, Mohamed Kariye, 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.

2. I am a U.S. citizen and live with my wife and three of my children in Portland, Oregon.

3. I am the imam, or religious leader, of Masjid As-Saber, also known as The Islamic Center of Portland.

4. Prior to March 8, 2010, I flew for years without any problems.

5. In early 2010, I sought to visit my daughter, who at the time was a high school student in Dubai. I booked tickets to travel by plane from Portland to Dubai, via Amsterdam.

3 - DECLARATION OF MOHAMED KARIYE

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



6. On March 8, 2010, I was denied boarding on my flight to Amsterdam at the Portland International Airport. An airline employee told me that I could not fly because I am on a government watch list. When she told me this, five government officials, including a police officer, detective, U.S. Marshal and two FBI agents were surrounding me.

7. I felt humiliated that everyone near me in the airport, including government and airline officials and other travelers, could see that I was denied boarding on my flight. I felt like I was being treated like a suspected terrorist.

8. My placement on the No Fly List has prevented me from traveling from my home in Portland to other parts of the United States and to other countries. I have no practical means of traveling to these locations without flying.

9. Because I am on the No Fly List, I could not travel from Portland to Dubai to be with my daughter, and presently cannot travel from Portland to Saudi Arabia to accompany my mother on the *hajj* pilgrimage, an Islamic religious obligation. I cannot make the 6,500-mile journey from Portland to Dubai or Saudi Arabia without flying because travel over land and by ship is prohibitively expensive, time consuming, and dangerous. A one-way journey to either destination would take weeks, and possibly more than a month to complete. I also fear interrogation and detention in any countries through which I would need to transit.

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

4 - DECLARATION OF MOHAMED KARIYE

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

11. 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.

12. 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

  
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MOHAMED KARIYE

5 - DECLARATION OF MOHAMED KARIYE

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