

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN ACADEMY OF RELIGION; AMERICAN
ASSOCIATION OF UNIVERSITY PROFESSORS;
PEN AMERICAN CENTER; TARIQ RAMADAN,

Plaintiffs,

v.

MICHAEL CHERTOFF, in his official capacity as
Secretary of the Department of Homeland Security;
CONDOLEEZZA RICE, in her official capacity as
Secretary of State,

Defendants.

**DECLARATION OF
JAMEEL JAFFER**

Case No. 06-588 (PAC)

DECLARATION OF JAMEEL JAFFER

I, Jameel Jaffer, of Brooklyn, New York, do declare:

1. I am counsel for plaintiffs in this action.
2. On January 3, 2007, prior to the pre-motion conference with the Court, counsel for defendants, David Jones, clarified three points relating to this litigation.
3. First, counsel for defendants stated that the specific provision on the basis of which the State Department denied Professor Ramadan's September 2005 visa application is 8 U.S.C. § 1182(a)(3)(B)(iv)(VI)(dd).
4. Second, counsel for defendants stated that the government's decision to deny Professor Ramadan's visa was based solely on the information that Professor Ramadan provided to the government during his visa interviews.

5. Third, counsel for defendants stated that the government does not regard Professor Ramadan to be inadmissible on any basis other than the one described in the Consul's letter dated Sept. 19, 2006.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 21st day of February, 2007.



Jameel Jaffer