

EXHIBIT 11

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GHASSAN ALASAAD, NADIA)
ALASAAD, SUHAIB ALLABABIDI, SIDD)
BIKKANNAVAR, JÉRÉMIE DUPIN,)
AARON GACH, ISMAIL ABDEL-RASOUL)
AKA ISMA'IL KUSHKUSH, DIANE)
MAYE, ZAINAB MERCHANT,)
MOHAMMED AKRAM SHIBLY, AND)
MATTHEW WRIGHT,)

Plaintiffs,)

v.)

KIRSTJEN NIELSEN, SECRETARY OF)
THE U.S. DEPARTMENT OF HOMELAND)
SECURITY, IN HER OFFICIAL)
CAPACITY; KEVIN MCALEENAN,)
COMMISSIONER OF U.S. CUSTOMS)
AND BORDER PROTECTION, IN HIS)
OFFICIAL CAPACITY; AND RONALD)
VITIELLO, ACTING DIRECTOR OF U.S.)
IMMIGRATION AND CUSTOMS)
ENFORCEMENT, IN HIS OFFICIAL)
CAPACITY,)

Defendants.)

Civil Action No. 17-cv-11730-DJC

Hon. Denise J. Casper

DECLARATION OF PLAINTIFF DIANE MAYE ZORRI

1. I am a university professor and a former captain in the United States Air Force.
2. I am a U.S. citizen.
3. I reside in Florida.
4. On June 25, 2017, I flew from Oslo, Norway, to Miami, Florida. I was on my way home after a vacation in Europe. I was traveling with a locked MacBook Pro laptop computer and a locked iPhone 7 smartphone.

5. Upon landing, a U.S. Customs and Border Protection (“CBP”) officer seized my laptop and phone and ordered me to unlock the devices.

6. I was coerced into unlocking both devices. I was alone with two CBP officers in a small room that felt like a police station. An officer had ordered me to enter the room. I understood, based on the CBP officers’ tone and demeanor, that they were commanding me to unlock my devices. I was exhausted after 24 hours of continuous travel, and I needed to communicate with my husband, who was waiting for me.

7. I observed a CBP officer manually search my unlocked laptop.

8. My unlocked phone was seized for about two hours. During most of this time, my phone was out of my sight. I believe that officers searched my phone during this time.

9. I felt that the search violated my privacy. It felt like CBP was prying into my personal and professional life.

10. I regularly travel internationally for personal reasons, and carry electronic devices with me when I do so.

11. To the best of my knowledge, since January 1, 2013, I have returned to the United States from an international trip at least 10 times.

12. At the current time, I intend to continue traveling internationally for professional and personal reasons.

13. There is a significant possibility that I will travel to Italy for personal reasons in June or July 2019.

14. I have tentative plans to attend conferences in Serbia in June 2019 and the Czech Republic in November 2019, but have not yet booked travel.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 10, 2019

A handwritten signature in black ink, appearing to read "Diane Maye Zorri". The signature is written in a cursive, flowing style.

Diane Maye Zorri