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1 - DECLARATION OF SALAH ALI AHMED
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 SALAH ALI AHMED
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
SALAH ALI AHMED IN
SUPPORT OF PLAINTIFFS'
CROSS-MOTION FOR PARTIAL
SUMMARY JUDGMENT AND IN
OPPOSITION TO DEFENDANTS'
MOTION FOR PARTIAL
SUMMARY JUDGMENT**

I, Salah Ali Ahmed, 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. I live with my wife and six children in Norcross, Georgia, where I work as an electrical technician.

3. Prior to July 16, 2010, I flew without any problems.

4. In 2008, I flew to Yemen to spend time with my siblings, nieces, nephews, and other relatives who live there.

5. During the summer of 2010, I planned to fly to Yemen for a four-week trip to be with my relatives. I was scheduled to fly from Atlanta to Sana'a, Yemen via Frankfurt.

6. On July 16, 2010, I was denied boarding on my flight to Frankfurt at Hartsfield-Jackson Atlanta International Airport. An airline employee told me that my passport was “flagged” and that I would not be permitted to board any flight, even within the United States.

7. 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.

8. Several government officials whom I believe were with the Transportation Security Administration, U.S Marshals Service and Atlanta Police surrounded me. The TSA officer told me that I was “flagged” and would not be allowed to board any flights. The officer told me that I could travel by car, but that I could not leave the country by plane.

9. Shortly after I was denied boarding, FBI agents asked me to speak to them. They again questioned me around late April 2012. The agents asked me about a particular person from Yemen whom I had never heard of.

10. Because I am on the No Fly List I cannot to travel to Yemen to be with my extended family or to manage property that I own there. I cannot travel over land and by ship from Atlanta to Yemen. Such a journey would be prohibitively expensive, time consuming, and dangerous. It would 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 transiting through other countries in order to travel to Yemen will expose me to interrogation and detention by foreign authorities. For these reasons, I was unable to travel to Yemen in 2012 when my brother died.

11. 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.

12. 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.

13. 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 22, 2013

s/ Salah Ali Ahmed
SALAH ALI AHMED