

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf  
of themselves and others similarly situated,

Plaintiffs,

v.

JOSEPH R. BIDEN, President of the  
United States, *et al.*,

Defendants.

No. 2:17-cv-00094-RAJ

**DECLARATION OF SAJEEL  
MANZOOR IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT**

**NOTE ON MOTION CALENDAR:  
July 2, 2020**

I, Sajeel Manzoor, hereby declare:

1. I makes this declaration based on personal knowledge and if called to testify to these facts, I could and would do so competently.

2. I am a named plaintiff in *Wagafe, et. al v. Joseph R. Biden, et al.*

3. I am a national of Pakistan and Muslim.

4. I live in Seattle, Washington with my wife and two children. I work as an SVP of Marketing at a U.S. bank.

5. In August 2001, I came to the United States to further my education. I graduated with a master's degree in Marketing Research from the University of Texas, at Arlington, two years later.

1           6.       My wife and I applied for adjustment of status in October 2007. A few months  
2 after applying, I received a call and visit from the FBI. During the visit, an FBI agent and a  
3 county law enforcement officer came to my home and asked me questions for over two hours.  
4 During their visit, they asked me if I was helping anyone come to the United States or if I knew  
5 someone trying to come to the United States from Pakistan. They also asked about my  
6 immigration history and intrusive questions about my family members, where they lived and  
7 what they do for a living. It felt like they were profiling us. For years, I wondered why they came  
8 to visit and to this day I do not know. After this incident our application was delayed for almost  
9 three years. During this time, I was denied my employment authorization requests and all my  
10 travel requests. It was incredibly frustrating as we had no idea why everything was taking so  
11 long.

12           7.       My adjustment of status application was finally granted around September 2010.  
13 My wife's application was granted around August 2010. We received no explanation from  
14 USCIS as to why it took such a long time to process.

15           8.       In November 2015, my wife and I applied for naturalization. I received no  
16 updates about my application for almost 18 months. After I filed my application, I received  
17 another visit and a call from the FBI. This was around mid- to late 2016. I was not at home when  
18 they came to visit me, but my daughter was. The agents just told her that they were from the FBI  
19 and wanted to meet me. The FBI agents then called me and told me that they were checking in  
20 because they were on high alert and were making sure that everything was safe in the months  
21 leading to the presidential election. They asked me if I knew of anyone who might be a security  
22 risk that is coming to this country, and I said that I did not.

23           9.       During this time, I was concerned about why there was such a long delay in my  
24 application and so much scrutiny. I did not travel internationally during this time because I was  
25 afraid that I would not be allowed back into the country. This fear stemmed from my experience  
26 waiting to become a lawful permanent resident. The process was riddled with delays and  
27 obstacles and lacked transparency. So, unsurprisingly, I was afraid that if I left the country, I  
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1 would not be allowed back in. Due to that fear, I missed my grandfather’s funeral in Pakistan. I  
2 also missed my sister-in-law’s engagement and wedding in Pakistan. It was difficult missing out  
3 on so many important family events, but we felt like we did not have a choice.

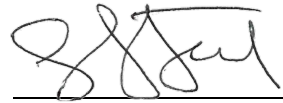
4 10. Due to the delays in my naturalization application, I suffered from stress and  
5 anxiety. It was difficult knowing that my immigration status was in limbo. During this time, I  
6 was never informed as to why my application was delayed and I was never given the opportunity  
7 to provide a response or advocate for myself. In May 2017, shortly after joining this litigation,  
8 USCIS finally scheduled my naturalization application interview. My application was then  
9 granted on the same day as my interview.

10 11. My wife was also affected by delays and obstacles with USCIS adjudicating her  
11 application as her own naturalization application was rejected due to agency error. USCIS  
12 interviewed her around October 2016. At the time, I had not heard any updates about my own  
13 application even though we applied at the same time in 2015. Her application was denied around  
14 November 2016 because USCIS had erroneously approved her derivative adjustment of status  
15 application a month before approving my application, even though I was the primary applicant.  
16 We were incredibly frustrated by this because we had no control over the timing that they  
17 processed our adjustment of status applications. We hired an immigration attorney in 2016 to  
18 appeal the denial and her application ended up being granted around September 2018, about 21  
19 months later.

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1           12. As someone who has lived in the United States for almost 20 years, it is  
2 incredibly demoralizing to go through this process and feel like the government is discriminating  
3 against us because of our religion and country of origin. The delays with USCIS and unfounded  
4 scrutiny caused extreme mental stress for my whole family. It made me feel like the government  
5 does not want us here for no reason other than because we are Muslim and from Pakistan.

6           I declare under penalty of perjury that the foregoing is true and correct to the best of my  
7 knowledge and belief under the laws of the United States of America. Executed on 22nd of  
8 March, 2021, in Seattle, Washington.

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Sajeel Manzoor