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**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  
RAYMOND EARL KNAEBLE IV  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR A PRELIMINARY  
INJUNCTION**

I, Raymond Earl Knaeble IV, 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 the motion by Plaintiffs Ayman Latif, Faisal Nabin Kashem, Elias Mustafa Mohamed, Samir Mohamed Ahmed Mohamed, Abdullatif Muthanna, Saleh A. Omar, and Abdul Hakeim Thabet Ahmed for a preliminary injunction in the above-captioned case.

2. I am a twenty-nine-year-old United States citizen and U.S. Army veteran. I was born in Ventura, California and raised in Ventura and Santa Barbara, California, and Winona, Texas.

3. In 2006, I moved from the United States to Kuwait to work for ITT Systems Corporation (“ITT Systems”), a multinational company specializing in global defense and security.

4. In late 2008, I converted to Islam. From August 2009 to December 2009, I studied at the Saba Institute, a language school in Sana’a, Yemen that specializes in teaching Arabic to foreigners.

5. I returned to Kuwait in December 2009 and created a website, [www.islambrotherhood.com](http://www.islambrotherhood.com), to provide the public with information about Islamic beliefs and practices.

6. On March 1, 2010, ITT Systems offered me a position as a heavy mobile equipment mechanic/driver in Qatar. The effective date of employment was contingent upon my passage of a pre-employment medical exam that was to be scheduled within days of acceptance of the offer. ITT Systems indicated that a medical exam administered in the United States would be processed more quickly than one administered in a foreign country.

7. I accepted the ITT Systems position in Qatar and scheduled my physical examination to take place in Killeen, Texas on March 16, 2010. Prior to moving to Qatar to start my new job, I planned to travel to Bogotá, Colombia so that I could marry my fiancé, a Colombian citizen, and spend some time with her family and my relatives, including my grandfather and aunts. Following my scheduled medical examination and

before moving to Qatar with my new wife, I also planned to visit my eight-year-old daughter in Texas and my mother and sisters in California while in the United States.

8. I booked airline tickets to travel first on Turkish Airlines and Iberia Airlines from Kuwait to Bogotá, where I would spend several days for my wedding and visiting relatives, and then from Bogotá to the United States. My itinerary for travel from Kuwait to Bogotá included changes of aircraft in Istanbul, Barcelona, and Madrid. I chose this itinerary in order to book the lowest fares I could find from Kuwait to Bogotá. My itinerary for travel from Bogotá to the United States scheduled me to fly from Bogotá to Miami on LAN Airlines and from Miami to Killeen on American Airlines with a change of aircraft in Dallas.

9. On March 10 and 11, 2010, I flew from Kuwait to Bogotá without incident.

10. On March 14, 2010, I went to Aeropuerto Internacional El Dorado in Bogotá. An airline official denied me a boarding pass for LAN Airlines Flight 570 to Miami and told me that no airlines would permit me to board a flight bound for the United States. I was instructed to contact the U.S. Embassy in Bogotá.

11. I went to the U.S. Embassy the following day, on March 15, 2010. I spoke with Scott Renner, the American Citizen Services Chief. Mr. Renner took my passport and told me to call the next day. Mr. Renner did not return my passport that day.

12. I called the U.S. Embassy on March 16, 2010. Embassy officials instructed me to return several days later.

13. Approximately four days later, I met with two FBI agents at the U.S. Embassy. The agents identified themselves only as “Charles” and “Loretta,” despite my

repeated requests to see their identification and credentials. Charles and Loretta questioned me for six hours about my life before and after converting to Islam. I asked them when I would be permitted to return to the United States. The agents told me to be patient and said that they were doing their job. Despite my repeated questions, neither agent told me why I had been placed on the No Fly List or why they were questioning me.

14. Over the course of the following four weeks, I lived in hotels in Bogotá and spoke regularly with FBI agents and U.S. Embassy officials in an effort to learn why I was not permitted to board a flight for the United States and to answer their questions. I met with Charles and Loretta at least ten times. I hoped that by cooperating with FBI and embassy officials, I would secure permission to fly.

15. On March 26, 2010, I completed a DHS TRIP form online. I was assigned Redress Control Number 2093292.

16. Due to the exorbitant cost of living in hotels in Bogotá, I moved to Santa Marta, which is located on the coast of Colombia, to live with the financial support of relatives while trying to sort out a way to return to the United States.

17. Sometime in April 2010, I received a call from Rodney Sanchez of the FBI. Agent Sanchez indicated that he was a member of the Dallas, Texas FBI office and that he wanted to question me. I met with Agent Sanchez approximately five times and answered his questions.

18. On April 13, 2010, I received an email from ITT Systems indicating that because I had not taken the required physical exam in Killeen as planned, the firm had withdrawn the offer it made to me for a position in Qatar.

19. On or around April 21, 2010, Scott Renner returned my passport to me. I had been without a passport since March 15, 2010, the date on which Mr. Renner seized my passport.

20. On April 22, 2010, I told Agent Sanchez that I was being represented by an attorney at the Council on American-Islamic Relations. I asked the agent to call my attorney to discuss my situation and any further questions the FBI wanted to ask me. Agent Sanchez stated that he had been trying to help me return to the United States, but that since I had retained an attorney, he was no longer going to work on getting me a flight home. Agent Sanchez also stated that because I retained an attorney, I was “closing all doors in the investigation.”

21. I remained desperate to return to the United States. On May 11, 2010, I purchased a ticket to fly from Santa Marta to Nuevo Laredo, Mexico, with stops in Bogotá and Mexico City. I hoped to enter the United States over land by crossing the border between Nuevo Laredo and Laredo, Texas.

22. On May 12, 2010, I flew without incident from Santa Marta to Bogotá and from Bogotá to Mexico City. When I landed in Mexico City, however, Mexican government agents were waiting for me at the gate of the plane. The agents questioned me for more than three hours about Islam, my activities in Yemen, and various Islamic groups to which I do not belong. One agent asked me what I was doing in Mexico. I explained that I was traveling to Nuevo Laredo where I would meet my father and travel to the United States. The agent responded that I would not be doing any more traveling in Mexico and that the only trip I would take would be back to Colombia. The authorities refused to allow me to board a flight from Mexico City to Nuevo Laredo or to travel by

bus or any other means to the U.S.-Mexico border. The agents detained me for fifteen hours.

23. At around 3:00 P.M. the following day, the agents placed me on a flight back to Bogotá. When I arrived, I was able to secure permission to stay in Colombia for two months, until July 13, 2010.

24. Due to the high cost of living in Bogotá, I returned to live with family members in Santa Marta.

25. I remained desperate to return to the United States so that I could visit my family, including my mother and daughter, and get a job. I feared that my departure to a foreign country to attempt to travel to the United States would subject me to arrest, detention, interrogation, and search, as was the case when I flew from Colombia to Mexico on May 12, 2010.

26. I searched intensively for a way to travel by boat from Colombia to the United States. I conducted research online, spoke to travel agents, and asked everyone I knew in Colombia if there were boats leaving Colombia for the United States. I contacted six cargo companies, NAVES, CSAV Colombia, Anibal Ochoa, LTDA, Agunsa Colombia, and Costa Container Lines Colombia, but none of them currently permit passengers. I learned that the earliest practical opportunity for me to travel to the United States was to take a cruise ship from Colombia to Costa Rica in November and then to take a second cruise ship from Costa Rica to the United States. I could not afford such a trip, however, because it would cost me between \$3000 and \$4000. I learned that I could try to secure passage from Colombia to Central America on small fishing boats,

but could not determine how to proceed from Central America to the United States through this method of transportation.

27. On June 26, 2010, I left Santa Marta for Venezuela to apply for an extension of my authorization to stay in Colombia with a Colombian consulate in that country. I was afraid of making this journey because of what happened when I flew to Mexico on May 12, 2010, but I felt I had no choice because my authorization to stay in Colombia was to expire in several weeks. On June 29, 2010, the Colombian consulate in Maracaibo, Venezuela granted me authorization to remain in Colombia until June 29, 2012. I returned to Santa Marta to live with family members.

28. I was desperate to return home to the United States. On August 2, 2010, I flew from Cartajena, Colombia to Panama City, Panama, with the hope of finding some way of traveling over land or by boat to the United States. I spent the night in a hotel.

29. On August 3, 2010, I boarded a bus from Panama City to San José, Costa Rica. I arrived on August 4, 2010 and spent the night in a hotel in San José.

30. On August 5, 2010, I boarded a bus that would take me from San José to Guatemala City, Guatemala with stops in Nicaragua, Honduras, and El Salvador. I arrived in Managua, Nicaragua that evening and spent the night in a hotel.

31. On August 6, 2010, I departed on the bus for Honduras. When the bus was approximately one hour away from the border of El Salvador, it stopped next to a building. Three or four officers wearing uniforms that said "Policia" surrounded the bus. One officer boarded the bus and asked everyone to exit the bus and line up next to it. The officers asked each person for their name. When I told them my name, several officers escorted me into an adjacent building and questioned me. I was worried and afraid of



what would happen. I feared that the officers would not release me and that if they did, my bus would have already left without me. After forty-five minutes of questioning, the officers permitted me to board the bus.

32. At the border between Honduras and El Salvador, the bus was stopped by Honduran officials. An official stamped my passport, permitting me to leave Honduras. An El Salvadoran immigration officer boarded the bus. He told me to get off of the bus and to take all of my belongings. I did not know why I was singled out this way. El Salvadoran officers searched all of my belongings and questioned me for more than half an hour. I again feared that my bus would leave while I was being questioned. I also feared that the officers would detain me. When the officers finally released me, my bus had departed the border crossing. I ran after the bus. Luckily, I reached the bus and was permitted to board.

33. About thirty minutes later, El Salvadoran police and drug enforcement officers stopped the bus. An officer asked for my passport and told me to step off of the bus. The officers searched all of my belongings. I did not know why I was singled out for search. I was again worried and afraid that the officers would not release me and that if they did, my bus would have left without me. The officers eventually returned my passport and permitted me to board the bus again.

34. Several hours later, El Salvadoran officers stopped the bus in a rural area, before we had reached San Salvador. I feared that officers would again remove me from the bus for questioning and search and would not permit me to continue on my journey. I also feared that the bus would leave without me, stranding me in this rural, deserted area. Eventually, the officers permitted the bus to proceed.

35. I was relieved when the bus finally arrived in San Salvador later that day. I spent the night in a hotel.

36. On August 7, 2010, I departed on the bus for Guatemala City and arrived that same day. I purchased a ticket for a bus that was leaving for Tapachula, Mexico the following morning and went to a hotel to spend the night. An hour after I had settled in my room, someone knocked on the door and asked, "Are you Raymond?" I was surprised and scared because I did not know anyone in Guatemala. I opened the door and spoke briefly to the man who had knocked on the door. He questioned me about what I was doing in Guatemala, asked if I was in trouble, and said, "People are asking about you and are coming around here looking for you. You shouldn't travel far away. If you do, you should tell someone where you are going." I explained that I was not in trouble and that I was just passing through Guatemala. I did not know who this person was or why he wanted to know where I was traveling. This encounter made me fear for my safety and believe that I was being followed.

37. On August 8, I boarded a bus for Tapachula and arrived that evening. I then boarded a bus for Mexico City. I arrived on the morning of Monday, August 9, 2010.

38. Later that day, I boarded a bus for Tijuana. I traveled on this bus for three days and three nights. On August 12, 2010, I got off the bus at Mexicali, a town located near the border of California and took a taxi to the border crossing. The taxi dropped me off in front of the U.S. inspection point at around 4:30 P.M..

39. I presented my passport to a U.S. Customs and Border Protection officer. The officer told me to step aside, to empty my pockets, to remove the belt from my pants,

and to put my hands behind my back. I was handcuffed and taken upstairs to a large room. I was questioned for two hours about, among other things, my life since high school, the reasons why I converted to Islam and learned Arabic, my time in Colombia, and the reasons why I sought to return to the United States. CBP officers took my laptop, thumb drive, camera, and iPod to be searched. My belongings were returned to me and I was released at around 2:30 A.M., ten hours after I had arrived at the inspection point. I spent the rest of the night in a nearby hotel.

40. On August, 12, 2010, I boarded a bus leaving from Calexico, California for San Francisco. I arrived in San Francisco at around 5:30 A.M. on August 13, 2010.

41. On August 14, 2010, I tried to turn on my laptop. I discovered that the hard drive had been removed. I believe that CBP officers seized my hard drive without telling me.

42. Because the Defendants barred me from flying to the United States, I was forced to travel for twelve days, mostly over land, from Santa Marta, Colombia to Mexicali, California in order to return to the United States. Honduran and El Salvadoran authorities subjected me to detention, interrogation, and search on three occasions. In Guatemala, I was followed and questioned. These experiences caused me to fear for my safety. Every time foreign authorities stopped me or subjected me to questioning and searches, I did not know if they would permit me to proceed or would detain me. Although I am a native Spanish speaker and was able to communicate in the language spoken in each of the countries I traveled through, this journey to the United States was fraught with peril and made me fear for my safety.

43. I present no security threat to commercial aviation and know of no reason why I would be placed on the No Fly List.

44. To this day, I cannot board commercial airlines to and from the United States or over U.S. airspace. I have been denied the ability to board a commercial flight from Bogotá to the United States. I have been told by FBI agents that I am not permitted to travel on any commercial flight to and from the United States or over U.S. airspace. Mexican authorities have prohibited me from entering Mexico and traveling to the United States by land.

45. I lost my job with ITT Systems and was prevented from returning to my home country to secure other employment and to visit my family because Defendants barred me from boarding commercial flights to or from the United States or over U.S. airspace.

46. I lost the value of two sets of tickets I had purchased to travel to the United States on commercial airlines. I never received reimbursement for my tickets to fly from Bogota to Killen in March 2010. I also never received reimbursement for my tickets to fly from Bogota to Nuevo Laredo in May 2010.

47. These events have had a serious emotional impact on me. I am frightened and feel harassed. I also feel that I have suffered from discrimination. Because I was unable to work in Colombia while I was stranded there, I was forced to spend almost my entire life savings to support myself and my wife, and had to stop providing my daughter with medical insurance.

48. 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 August 14, 2010

Raymond E Knaeble   
RAYMOND EARL KNAEBLE IV