

EXHIBIT 3

PII Redacted Pursuant to Fed. R. Civ. P. 5.2

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

USAMA JAMIL HAMAMA, et al.,
Plaintiffs/Petitioners,

v.

REBECCA ADDUCCI, et al.,
Defendants/Respondents.

Case No. 2:17-cv-11910
Hon. Mark A. Goldsmith
Mag. David R. Grand

Class Action

DECLARATION OF GHADA ATTIEH

I, Ghada Attieh, make this declaration based upon my own personal knowledge and if called to testify, I could and would do so competently as follows:

1. I am the owner of Beyond Words, an interpretation and translation firm in Washington D.C. I founded the firm in 2005. We specialize in English, French, and Arabic translations.

2. I have a certificate in paralegal studies from Georgetown University; a Masters Degree in Linguistics and a Bachelors degree in Translation from Université Laval (Quebec, Canada). I am fluent in English, French, and Arabic, with special expertise in interpretation and translation in legal matters.

3. Attached to my declaration are Exhibits A-K. Exhibits A and B each consist of two documents which are blank, apart from the printed text: an English document and an Arabic document. The Arabic documents which are part of Exhibits A and B are nearly identical to the pre-printed Arabic forms attached as Exhibits C-K. The Arabic and English documents in Exhibit A are not the same as each other, and the Arabic and English documents in Exhibit B are not the same as each other

4. I was hired by the ACLU to translate several documents in this case—they are attached, with my translations, as Exhibits C-K. They are nearly identical pre-printed forms, in Arabic. They are filled in by hand or have hand-written notes on them. I was asked to translate only the parts that are printed and the dates

(including those that are in handwriting); I did not translate the other handwriting that appears on the documents.

5. Below is a list of Exhibits A-K, identifying the records by either the number used on the court docket or the Bates stamp number that appears in the center at the bottom of the page and starts with prefix "ICE."

- Exhibit A ACLU counsel told me that these documents were provided by Lauren Gilbert and filed with the Court at ECF 307-2, Pg.ID 7330-31. The exhibit consists of both an English and Arabic document.
- Exhibit B ACLU counsel told me that these documents accompanied the declaration of James Maddox and were filed with the court at ECF 311-3, Pg.ID 7489-90. The exhibit consists of both an English and Arabic document.
- Exhibit C ICE-0295885; dated 21/3/2016.
- Exhibit D ICE-0296712; dated 20/6/2016.
- Exhibit E ICE-0296587; dated 12/30/ 2016.
- Exhibit F ICE-0295793; dated [illegible], 2016.
- Exhibit G ICE-0267486; preprinted date: 2016.
- Exhibit H ICE-0267496; preprinted date: 2016.
- Exhibit I ICE-0295669; dated 5/4/2017, with the preprinted year 2016 crossed out and replaced with 2017 (the "6" in "2016" was replaced with a handwritten "7").
- Exhibit J ICE-0267593; preprinted year 2016 crossed out and "06-8-2017" written by hand.
- Exhibit K ICE-0296616; dated 04/11/2017, with the preprinted year 2016 crossed out and replaced with 2017 (the "6" in "2016" was replaced with a handwritten "7").

6. I had previously translated the Arabic portion of Exhibit A (which is identified as ECF 307-2, Pg.ID 7331). I understand that translation was submitted to the court in this case as ECF 307-3, Pg.ID 7333-36; it is attached to my Declaration as Exhibit A-1. I had not previously seen the English portion of Exhibit A, which is identified as ECF 307-2, Pg.ID 7330. Though both documents have similar language, the English document references a passport rather than a limited-validity passport, omits the phrase "with the knowledge that I don't hold a passport," and adds the sentence "I would like to inform you that I have an old Iraqi passport that is not valid with the number ()."

7. The translation of the Arabic page of Exhibit A (ECF 307-2, Pg.ID 7331) is:

Dear Honorable Consul,

Subject: Limited-Validity Passport

I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport.

Sincerely,

Signature:

Name of Citizen:

Date:

Address:

Telephone Number:

8. In Exhibit A, the English document is different from the Arabic document. Below is a reproduction of the English document, showing how it differs from the Arabic version (deletions are shown in strike-out, and additions are bolded):

Dear Honorable Consul,

Subject: ~~Limited-Validity~~ Passport

I the Iraqi citizen () would like to request the issue of a ~~limited-validity~~ passport allowing me to enter Iraq due to my particular situation and my desire to return voluntarily to Iraq, ~~with the knowledge that I don't hold a passport.~~

I would like to inform you that I have an old Iraqi passport that is not valid with the number ().

With thanks and appreciation,

The signature:

The name:

The date:

The address:

The telephone number:

9. Exhibit B is identical to Exhibit A, in both the English and Arabic.

10. Exhibits C through K are nearly identical to the Arabic documents in Exhibits A and B; the only difference (apart from omission of a salutation) is the addition of the phrase “to return to to [sic] the homeland.” Exhibits C through K are identical to each other except that some have a preprinted year (2016) and others do not.

11. Exhibits C through K read, in translation with the bolded text showing the language that appears on Exhibits C through K but not in the Arabic versions of Exhibits A and B, and strike-outs for language that appears on Exhibits A and B but not Exhibits C through K:

Dear Honorable Consul,

Subject: Limited-Validity Passport

I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport **to return to to [sic] the homeland.**

Signature:

Name of Citizen:

Date:

Address:

Telephone number:

12. I hereby certify that the translations just provided are true and accurate versions of the original Arabic documents, and that I am competent in both English and Arabic to render and certify such translations.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the above statements are true and correct to the best of my knowledge, information, and belief.

Executed this 24th day of August, 2018, in Washington, DC

Ghada Attieh

Ghada Attieh

EXHIBIT A

Dear Honorable Consul,

Subject: Passport

I the Iraqi citizen () would like to request the issue of a passport allowing me to enter Iraq due to my particular situation and my desire to return voluntarily to Iraq.
I would like to inform you that I have an old Iraqi passport that is not valid with the number ().

With thanks and appreciation,

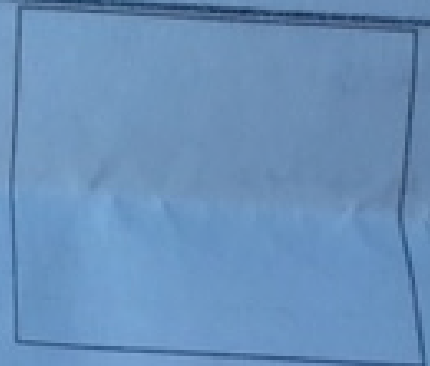
The signature:

The name:

The date:

The address:

The telephone number:



Left thumb fingerprint

السيد القنصل المحترم

م. / جواز مرور

اني المواطن العراقي (ارجو اصدار جواز مرور لي الى العراق
وذلك لظروف خاصة ورجبتي بالعودة الطوعية الى العراق، علماً انني لا احمل جواز سفر .
مع الشكر والتقدير .

التوقيع :

المواطن :

التاريخ :

العنوان :

رقم الهاتف :

بصم

EXHIBIT A-1

CERTIFICATE OF TRANSLATION

We, Beyond Words, LLC, hereby certify that the English document entitled **Subject/Limited-Validity Passport**, is a true and accurate version of the original Arabic document. We further certify that we are competent in both English and Arabic to render and certify such translation.

Beyond Words, LLC Signature: Ghada Attieh

Beyond Words, LLC Printed Name: GHADAATTIEH

NOTARY

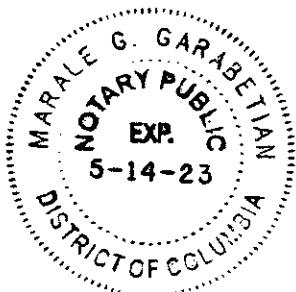
District of Columbia: SS

Subscribed and Sworn to before me, in my presence,
this 6th day of JUNE, 2018

Marale G. Garabetian
Notary Public, DC

My commission expires on 05/14, 2023.

MARALE G. GARABETIAN
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires May 14, 2023



Beyond Words, LLC
910 17th Street NW
Suite 415
Washington, DC 20006
Telephone: (202) 419-1805
info@beyond-words.us
www.beyond-words.us

Beyond Words

Translation | Interpretation | Consulting
Connecting Cultures Through Language

I certify that the foregoing statement of my qualifications and the foregoing translation are true and correct, under penalty of perjury under the laws of the United States.

WASHINGTON, DC

Sworn in {CITY OR COUNTY}, {STATE}, on this 6th day of June, 2018.

Ghada Attieh [signature]
Ghada Attieh

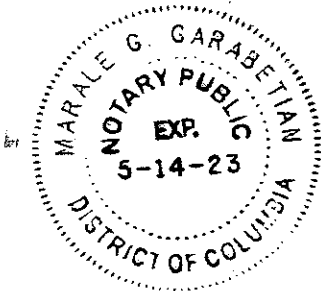
District of Columbia: SS

Subscribed and sworn to before me, in my presence,
this 6th day of JUNE, 2018

Marale G. Garabetian
Marale G. Garabetian, Notary Public, D.C.

My commission expires May 14, 2023.

MARALE G. GARABETIAN
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires May 14, 2023



Beyond Words, LLC
910 17th Street NW
Suite 415
Washington, DC 20006
Telephone: (202) 419-1805
info@beyond-words.us
www.beyond-words.us

Dear Honorable Consul,

Subject/ Limited-Validity Passport

I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport.

Sincerely,

Signature:

Name of Citizen:

Date:

Address:

Telephone number:

[Illegible]

الجنود القدامى المستقر

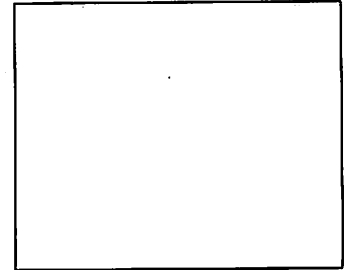
م. ر. ج. س. م. م. م.

الاسم: المواطن العراقي ()
وذلك لطرف خاص ورجعت بالعودة الطوعية الى العراق، علماً اني لا احمل جواز سفر .
مع الشكر والتقدير .

التوقيع :
المواطن :
التاريخ :
العنوان :
رقم الهاتف :

EXHIBIT B

مستند رقم 143



: المستند رقم 143

: المستند رقم 143

: المستند رقم 143

: المستند رقم 143

: المستند رقم 143

. المستند رقم 143

. المستند رقم 143

(المستند رقم 143)

مستند رقم 143

مستند رقم 143

EXHIBIT C

Dear Honorable Consul,

Subject/ Limited-Validity Passport

I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport **to return to to [sic] the homeland**.

[No salutations]

Signature:

Name:

Date: 21/3/2016

Address:

Telephone number:

Left thumb fingerprint

[fingerprint]

السيد القنصل المحترم

م / جواز مرور

اني المواطن العراقي ([REDACTED]) ارجو اصدار جواز مرور لي الى العراق وذلك
لظروف الخاصة ورجعتي بالعودة الطوعية الى العراق , علماً انني لا احمل جواز سفر للعودة الى الى
ارض الوطن .

التوقيع :

الاسم :

التاريخ :

العنوان :

رقم الهاتف :

بصمة الايهام الايسر

EXHIBIT D

HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

Dear Honorable Consul,

Subject/ Limited-Validity Passport

I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport **to return to to [sic] the homeland.**

[No salutations]

Signature:

Name:

Date: 20/6/2016

Address:

Telephone number:

Left thumb fingerprint

[fingerprint]

السيد القنصل المحترم

م / جواز مرور

اني المواطن العراقي ([REDACTED]) ارجو اصدار جواز مرور لي الى العراق وذلك
لظروف الخاصة ورجيتي بالعودة الطوعية الى العراق , علماً انني لا احمل جواز سفر للعودة الى الى
ارض الوطن .

التوقيع :

الاسم :

التاريخ :

العنوان :

رقم الهاتف :

بصمة الابهام الايسر

EXHIBIT E

HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

Dear Honorable Consul,

Subject/ Limited-Validity Passport

I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport **to return to to [sic] the homeland.**

[No salutations]

Signature:

Name:

Date:12/30/2016

Address:

Telephone number:



Left thumb fingerprint

السيد القنصل المحترم

م / جواز مرور

انني المواطن العراقي [REDACTED] ارجو اصدار جواز مرور لي الى العراق وذلك
لظروف الخاصة ورغبتي بالعودة الطوعية الى العراق , علماً انني لا احمل جواز سفر للعودة الى الى
ارض الوطن .

التوقيع :

الاسم :

التاريخ : 2016/ [REDACTED]

العنوان :

رقم الهاتف :

بصمة الابهام الايسر

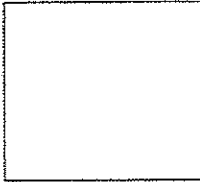


EXHIBIT F

HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

Dear Honorable Consul,

Subject/ Limited-Validity Passport

I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport **to return to to [sic] the homeland.**

[No salutations]

Signature:

Name:

Date: [illegible handwritten date]/ 2016

Address:

Telephone number:

Left thumb fingerprint



السيد القنصل المحترم

ج. / جواز مرور

انني المواطن العراقي [REDACTED] ارجو اصدار جواز مرور لي الى العراق وذلك
لظروف الخاصة ورجعتي بالعودة الطوعية الى العراق ، علماً انني لا اهن جواز سفر للعودة الى الى
ارض الوطن .

التوقيع

الاسم

التاريخ :

العنوان :

رقم الهاتف

بسمه الايهام الايسر

EXHIBIT G

HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

Dear Honorable Consul,

Subject/ Limited-Validity Passport

I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport **to return to to [sic] the homeland.**

[No salutations]

Signature:

Name:

Date: __/__/2016

Address:

Telephone number:

Left thumb fingerprint



Subject Refused

السيد القنصل المحترم

م / جواز مرور

اني المواطن العراقي (ارجو اصدار جواز مرور لي الى العراق وذلك
لظروف الخاصة ورجيتي بالعودة الطوعية الى العراق , علماً انني لا احمل جواز سفر للعودة الى ارض الوطن .

التوقيع :

الاسم :

التاريخ : 2016/ /

العنوان :

رقم الهاتف :

بصمة الابهام الايسر



EXHIBIT H

HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

Dear Honorable Consul,

Subject/ Limited-Validity Passport

I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport **to return to to [sic] the homeland.**

[No salutations]

Signature:

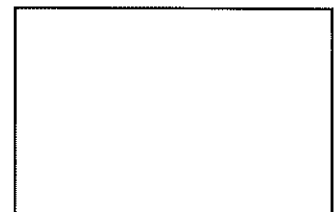
Name:

Date: __/__/2016

Address:

Telephone number:

Left thumb fingerprint



Subject Refused

السيد القنصل المحترم

م / جواز مرور

اني المواطن العراقي (ارجو اصدار جواز مرور لي الى العراق وذلك
لتظروف الخاصة ورجعتي بالعودة الطوعية الى العراق , علماً انني لا احمل جواز سفر للعودة الى الى
ارض الوطن .

التوقيع :

الاسم :

التاريخ : / / 2016

العنوان :

رقم الهاتف :

بصمة الايهام الايسر

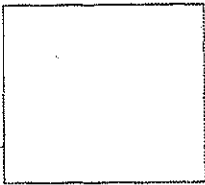


EXHIBIT I

HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

Dear Honorable Consul,

Subject/ Limited-Validity Passport

I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport **to return to to [sic] the homeland**.

[No salutations]

Signature:

Name:

Date: 5/4/2016 [handwritten 7]

Address:

Telephone number:

Left thumb fingerprint

[fingerprint]

السيد القنصل المحترم

م / جواز مرور

اني المواطن العراقي ([REDACTED]) ارجو اصدار جواز مرور لي الى العراق وذلك
لظروف الخاصة ورغبتي بالعودة الطوعية الى العراق , علماً انني لا احمل جواز سفر للعودة الى
ارض الوطن

التوقيع

الاسم :

التاريخ :

العنوان :

رقم الهاتف :

بصمة الابهام الايسر

EXHIBIT J

Dear Honorable Consul,

Subject/ Limited-Validity Passport

I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport **to return to to [sic] the homeland.**

[No salutations]

Signature:

Name:

Date: __/__/2016 [handwritten 06-8-2017]

Address:

Telephone number:

Left thumb fingerprint

[fingerprint]

السيد القتل المحترم

م / جواز مرور

اني المواطن العراقي (ارجو اصدار جواز مرور لي الى العراق وذلك
لظروف الخاصة ورغبتي بالعودة الطوعية الى العراق . علماً انني لا احمل جواز سفر للعودة الى
ارض الوطن .

التوقيع

الاسم

التاريخ :

العنوان :

رقم الهاتف

بصمة الايهاام الايسر

EXHIBIT K

Dear Honorable Consul,

Subject/ Limited-Validity Passport

I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport **to return to to [sic] the homeland.**

[No salutations]

Signature:

Name:

Date: 04/11/2016- [handwritten 7]

Address:

Telephone number:

Left thumb fingerprint

[fingerprint]

السيد القنصل المحترم

م / جواز مرور

انني المواطن العراقي ([REDACTED]) ارجو اصدار جواز مرور لي الى العراق وذلك
لظروف الخاصة ورجيتي بالعودة الطوعية الى العراق , علماً انني لا احمل جواز سفر للعودة الى
ارض الوطن .

[REDACTED] : التوقيع

[REDACTED] : الاسم

[REDACTED] : التاريخ 2018

[REDACTED] : العنوان

[REDACTED] : رقم الهاتف

بصمة الايهام الايسر

