# EXHIBIT 7

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

USAMA JAMIL HAMAMA, et al.,

Petitioners/Plaintiffs,

ν.

REBECCA ADDUCCI, et al.,

Respondents/Defendants.

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

#### **DECLARATION OF EDGAR LOPEZ**

I, Edgar Lopez, make this declaration based upon my own personal knowledge. I am over 18 and competent to make this declaration:

- 1. I am a Legalization Specialist with Cogency Global, a company that provides authentication, legalization, and apostille services to assist in authenticating documents such as birth certificates, court judgments, policy statements, and patent registrations for use in countries other than their issuing country.
- 2. As a Legalization Specialist, I frequently present documents to foreign diplomats or consular officials at many foreign embassies or consulates for certification that the document is valid.
- 3. On June 28, 2018, I presented a document—the last two pages of this Declaration's Exhibit—to a consular official at the Iraqi Embassy in Washington, D.C. The pages are in Arabic. This consular official's duties include document authentication; I have met with him many times for this purpose.
- 4. The consular official explained that these two pages are an official document issued by the Government of Iraq, and that the individual whose name appears on the letter that appears on the first of the two pages does in fact work in the Consular Department at the Iraqi Ministry of Foreign Affairs. He did not

express any doubts about the document's authenticity. However, he said, he could not authenticate it because the Iraqi Consulate does not authenticate documents from Iraq. (Rather, what they do is authenticate documents to be used *in* Iraq.)

- 5. In a further attempt to obtain authentication, Petitioners' counsel in this lawsuit then shared with me a certified and notarized translation of the two pages. That certified and notarized translation is also part of this Declaration's Exhibit—it is the third to the sixth pages. Because the notarization on the translation was from New York State, and used a New York State seal, I submitted it to the New York Secretary of State for certification, which I obtained. This authentication is the second page of the Exhibit.
- 6. I then took the certified translation and the underlying Iraqi document back to the U.S. Department of State, which duly authenticated the seal of the State of New York. See the first page of the Exhibit. However, the U.S. Department of State's authentication explains that "[f]or the contents of the annexed document, the Department assumes no responsibility." This Declaration's Exhibit is a copy of the full packet—the U.S. Department of State authentication (page 1); the New York certification (page 2); the English translation and certification (page 3-6), and the Arabic document (page 7-8). (The Exhibit cannot be taken apart or the Department of State authentication becomes void.)
- 7. After I got that authentication back, I spoke to several officials at the Department of State; they again explained that they cannot authenticate documents like the underlying Iraqi document—they can only authenticate the New York State notarization/N.Y. Secretary of State certification.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on August 15, 2018, in Washington, DC.

# United States of America



#### **DEPARTMENT OF STATE**

### To all to whom these presents shall come, Greetings:

I Certify That the document hereunto annexed is under the Seal of the State(s) of New York, and that such Seal(s) is/are entitled to full faith and credit.\*

\*For the contents of the annexed document, the Department assumes no responsibility This certificate is not valid if it is removed or altered in any way whatsoever

In testimony whereof, I, Michael R. Pompeo, Secretary of State, have hereunto caused the seal of the Department of State to be affixed and my name subscribed by the Assistant Authentication Officer, of the said Department, at the city of Washington, in the District of Columbia, this twelfth day of July, 2018.

Issued pursuant to CHXIV, State of Sept. 15, 1789, 1 Stat. 68-69; 22 USC 2657; 22USC 2651a; 5 USC 301; 28 USC 1733 et. seq.; 8 USC 1443(f); RULE 44 Federal Rules of Civil Procedure.

Secretary of State

Assistant Authentication Officer,

Department of State

United States of America

# State of New York Department of State

It is hereby certified, that Judith A. Pascale was Clerk of County of Suffolk in the State of New York, and Clerk of the Supreme Court therein, being a Court of Record, on the day of the date of the annexed certificate, and duly authorized to grant same; that the seal affixed to said certificate is the seal of said County and Court; that the attestation thereof of said Clerk is in due form and executed by the proper officer; and that full faith and credit may and ought to be given to said Clerk's official acts.

In Testimony Whereof, the Department of State Seal is hereunto affixed.

Witness my hand at the city of New York

this 9th day of July Two Thousand and Eighteen



210CC(REV: 09/25/12)

Whitney A. Clark Special Deputy Secretary of State

Whitney a Clark



#### Ministry of Foreign Affairs

#### **Consular Department**

#: 6/4/h 13351

Date: 3/25/2018

To all our political and consular missions abroad

#### Circular

We attach for you, the letter of Ministry of Migration and Displaced/Department of Immigration Affairs/Foreign Migration Department, # (D/SH/H/773) dated 3/8/2018, including the Ministry's rejection of the principle of forced return of Iraqis abroad or any other nationals, because it conflicts with human rights international laws and resolutions, principles of the International Community and policy of the Iraqi government. In addition, Iraq strives to use all its capabilities to encourage and urge the host countries of refugees, asylum - seekers/applicants or those whose asylum applications were refused to allow voluntarily return to those who want to return to Iraq as an alternative solution for those countries, after coordination and cooperation with the Ministry of Migration and Displaced, our overseas missions and international organizations.

Kindly take notice and the necessary action to coordinate with those countries to reduce this serious phenomenon that affects Iraqis abroad.

#### **Attachments:**

- Letter

Ambassador:

Dr. Ahmed Nayef Rashid Al Dulaimi

**Head of the Consular Department** 

[Signed]

[Official stamp: Republic of Iraq, Ministry of Foreign Affairs]

3/25/2018

#### CC:

- Office of the Minister, a letter of His Highness on 3/19/2018, to kindly review and take notice.
- Office of the Undersecretary for Political Planning Affairs, to kindly review and take notice.
- Office of the Inspector General, to kindly review and take notice.
- Administrative Department, to kindly review and take notice.
- Ministry of Migration and Displaced/ Department of Immigration Affairs/ Foreign Migration Department, to kindly review and take notice.
- Al Dawar

[Ministry of Foreign Affairs letter head]

# (D/ SH/ H/ 773) Date: 3/8/2018

[Stamp: Outbound mail #365, Date: 3/15]

[Stamp: Minister of Migration and Displaced, Administrative and Financial Section, Outbound and

Inbound Division, Outbound mail / / 201 ]

#### Very urgent

To: Ministry of Foreign Affairs/Office of the Minister

#### Subject / Forced return of the Iraqi refugees

#### Greetings,

Based on the principle of protecting and caring for Iraqis abroad and in accordance with the human rights international laws and resolutions of, principles of the International Community and policy of our ministry, since it was established, we refuse the principle of forced return of Iraqis abroad or any other nationals, because it conflicts with humanitarian laws and principles. In addition, Iraq strives to use all its potential to encourage and urge the host countries of refugees, asylum - seekers/ applicants or those whose asylum applications are refused to allow the voluntarily return to those who wish to do so as an alternative solution, after coordination and cooperation with our Ministry, the Iraqi diplomatic missions and international organizations.

Kindly inform all our missions to coordinate with those countries to reduce this serious phenomenon that affects Iraqis abroad.

Kindly take notice... and all the action needed in this regard and inform us of your decision.

Sincerely,

Dr. Jassim Mohamed Mohamed Ali

Minister of Migration and Displaced

(Signed)

/ / 2018

#### CC:

- Office of the Minister, to kindly review and take notice.
- Office of the Director General/competent department.
- Department of Foreign Migration Department, to follow.

[Illegible footer]



# **CERTIFICATE**

OF ACCURACY

STATE OF NEW YORK

SS:

COUNTY OF NEW YORK

I, Fei Deng, Project Manager at Geneva Worldwide, Inc., being duly sworn, depose and say that Geneva Worldwide is a multilingual translation company. Geneva Worldwide provided the translation of the documents below from the Arabic language into the English language. My signature confirms that the documents have been examined, and have been deemed accurate and complete.

STATE OF NE	W YORK ss:	dated
I, JUDITH	A. PASCALE, Clerk of the County of Suffolk, and also Clerk of the Supreme Court for said Count the same being a Court of Record, DO HEREBY CERTIFY that  whose name is subscribed to the deposition or certificate of the proof or acknowledgement of annexed instrument and thereon written was at the time of taking such deposition or proof acknowledgement a NOTARY PUBLIC in and for such County, duly commissioned and swor and authorized by the laws of said State to take depositions and to administer oaths to be used of deeds of conveyances for land, tenements or hereditaments in said State of New York. An further that I am well acquainted with the handwriting of such NOTARY PUBLIC and verificate that the signature of said deposition or certificate of proof or acknowledgement is genuin IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the Seal of the said Court and County of Sufficient County of County and also Court and County of Sufficient County	he or m, in
Form No. 115	Gudith a. Pascale	1001202
	County Clerk 12-0240p. 09/06k	d



## CERTIFICATE

OF ACCURACY

STATE OF NEW YORK

SS:

COUNTY OF NEW YORK

I, Fei Deng, Project Manager at Geneva Worldwide, Inc., being duly sworn, depose and say that Geneva Worldwide is a multilingual translation company. Geneva Worldwide provided the translation of the documents below from the Arabic language into the English language. My signature confirms that the documents have been examined, and have been deemed accurate and complete.

Regarding:

- 1. Letter from Minister of Migration and Displaced, #(D/SH/H/773), dated 3/8/2018
- 2. Letter from Head of the Consular Department dated 3/25/2018

This certificate issued by Geneva Worldwide, Inc. 256 West 38<sup>th</sup> Street – 10<sup>th</sup> Floor, New York N.Y. 10018.

Certified By \_\_\_\_\_

Sworn to and subscribed before me

This 29th day of June 20

Notary Public

Christina S. Santiago
NOTARY PUBLIC, STATE OF NEW YORK
Qualified in Suffolk County
O1SA6361307
Commission Expires 07/03/2021

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**INISTRY OF FOREIGN AFFAIRS** 

PERUNIAN DE IRAG

وزارة الخ<u>ارجية</u> الدائرة القنصلية

CONSULAR DEPARTMENT | 3 5 5 | العدد: 4/4/6 | 2018/03/ التاريخ: 2-25

بعثاتنا السياسية والقنصلية في الخارج كافة

### م/ اعمام

نرافق لكم كتاب وزارة الهجرة والمهجرين / دائرة شؤون الهجرة / قسم الهجرة الخارجية المرقم (د/ش/ه/773) في 2018/3/8، المتضمن رفض الوزارة لمبدأ العودة القسرية العراقيين في الخارج او اي جنسية اخرى لأنها تتعارض من القوانين والقرارات الدولية الخاصة بحقوق الانسان ومبادئ المجتمع الدولي وسياسة الحكومة العراقية، في المقابل يسعى العراق جاهداً لتسخير جميع امكانياته لتشجيع وحث الدول المستضيفة للاجئين او طالبي اللجوء او المرفوضة طلبات لجوئهم بالعودة الطوعية للراغبين منهم بالعودة الى العراق كحل بديل لتلك الدول بعد التنسيق والتعاون مع وزارة الهجرة والمهجرين وبعثانتا في الخارج والمنظمات الدولية.

للتفضل بالاطلاع واتخاذ مايلزم بشأن التنسيق مع تلك الدول للحد من تلك الظاهرة الخطيرة الخطيرة التي تمس العراقيين في الخارج... مع التقدير.

<u>المرافقات:</u>

- كتاب.

السفير د. احمد نايف رشيد الدليمي رئيس الدائرة القنصليــــــة من 2018/03/



#### تسخة منه الهرز

- مكتب السيد الوزير، اشارة الى هامش سيادته بتاريخ 2018/3/19، للتفضل بالإطلاع... مع التقدير.
  - مكتب السيدة وكيل الوزارة تشؤون التخطيط السياسي، للتفضل بالإطلاع ... مع التقدير .
    - مكتب المفتش العام، للتفضل بالاطلاع ... مع التقدير.
      - الدائرة الادارية، للتفضل بالاطلاع... مع التقدير.
- وزارة الهجرة والمهجرين / دائرة شؤون الهجرة / قسم الهجرة الخارجية، كتابكم انفاء للتفضل بالاطلاع... مع التقدير .
  - الدواز ،



العدد : ( ) التاريخ : / ، ۲۰ ( عاجل جدا )

إلى/ وزارة الخارجية / مكتب الوزير

المؤضوع/ العودة القسرية لطالبي اللحوء العراقيين

ant att

شعبة النسادر والنوارد السادر والنوارد السادر ١٠١

وزارة الهجرة والمهجرين الدائرة الإدارية ءالاد

انطلاقا من مبدأ حماية ورعاية العراقيين في الخارج وحسب القوانين والقرارات المداية الحاصلة بحقوق الإنسان وسيادئ المجتمع الدولي وسياسة وعنهاج عمل وزارتنا منذ تأسيسها ولغاية الآن بأنها ترفض مبدأ العودة القسرية للعراقيين في الخارج او اي جنسية اخرى الأنها تتعارض مع تلك القوانين والعبادئ الانسانية، وفي المقابل تعمل وزارتنا حاهدة وتسمر حميع المكانياتها لتشجيع وحت الدول المستضيفة للاجئين او طالبي اللجوء او المرفوضة طلبات لجونيد بالعودة المواعية للراغيين منهم بالعودة الي العراق كمل بديل لتناه الدول بعد التنسيق والتعاون مع وزارتنا والبعنات الدبلوماسية العراقية في الخارج والمنظمات الدبانية.

ولجين اشعار جعيع بعثاثنا للتنسيق مع تلك الدول للحد من تلك الظاهرة الخطيرة التي نمس العراقيين في الخارج.

تفضيكم بالأطلاع بمالتخاف مايلزم بصدد هذا الموضوع واعلامنا مع فانق الشكر والتقدير

TEX EL

جاسم محمد محمد علي وزير الهجرة والمهجرين / /۲۰۱۸

#### المستشد عيليه الم

- . مكتبُ السيد الوزير المحترم/ للتنضي بالاطلاع أمع التقدير
  - حكت السيد المدير العام المحترم / الاضيارة المختصة
    - \_ قِسم الْهُجِرة النَّمَارِ جِيةً / للمُتَابِسَة