

MICHAEL N. FEUER
CITY ATTORNEY

June 30, 2017

The Honorable Secretary of State Rex W. Tillerson
U.S. Department of State
2201 C Street, N.W.
Washington, D.C. 20520

Re: Unlawful Implementation of Executive Order No. 13769
Against Iranian-American and other immigrant families

Dear Mr. Secretary:

I write to urge in the strongest possible terms that the Department of State alter its current proposed implementation of Executive Order No. 13769, entitled "Protecting The Nation From Foreign Terrorist Entry Into The United States," ("Executive Order"). I have grave concern over the arbitrary, inhumane, and unlawful application of the Executive Order in general, and in particular with regard to Los Angeles. The unlawful implementation is certain to cause serious harm to families in our City, particularly in our large and well-established Iranian-American community.

The greater Los Angeles metropolitan region is home to one of the world's largest populations of Iranian immigrants. More persons of Iranian heritage live in the Los Angeles area than anywhere in the world outside of Iran. According to a Brookings Institute study, the population of Iranian-Americans in greater Los Angeles is as high as 136,000. The vast majority of the Iranian-Americans living in the Los Angeles area trace their roots in this country to the Islamic revolution that overthrew the rule of Shah Reza Pahlavi in 1979. In addition to the large Iranian-American population in Los Angeles, many immigrants from the other five Muslim-majority countries singled out in the Executive Order also call Los Angeles their home.

The current version of the Executive Order does not comply with the decision of the Supreme Court of the United States in *Donald J. Trump, President of the United States, et al. v. International Refugee Assistance Project, et al.* ("*Trump*"). The Court's *Per Curiam* decision in *Trump* upheld a key portion of the injunction issued by the Ninth

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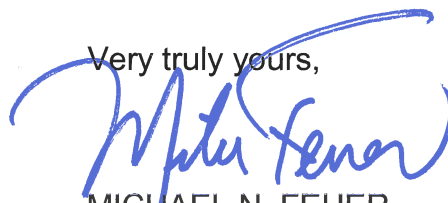
Circuit Court of Appeal, which precludes the federal government from enforcing Section 2(c) of the Executive Order against foreign nationals who have a credible claim of a *bona fide* relationship with a person or entity in the United States. The Court noted that, for individuals, “a close familial relationship is required,” defining the type of relationship that would qualify as a “close familial relationship” by citing the example of a “mother-in-law.”

Rather than abiding by the Supreme Court’s decision in *Trump*, the State Department intends to deny entry to certain close family members who undeniably enjoy a *bona fide* “close familial relationship”, including but not limited to grandparents and their grandchildren. In fact, the State Department’s June 29, 2017, alert inaccurately characterized the grandparent-grandchild relationship as “extended.” Grandparents and grandchildren, related by blood, adoption, or marriage, possess the same or greater familial bond as the mother-in-law example expressly cited by the Supreme Court.

I urge you to voluntarily and immediately conform the practices of the State Department, and other subsidiary federal agencies implementing the Executive Order, to comply with the Supreme Court’s decision upholding the injunction with regard to individuals with a “credible claim of a *bona fide* relationship with a person or entity in the United States.” The federal government has a clear legal and moral obligation to admit foreign nationals using the broadest and most common sense interpretation of the Supreme Court’s holding to include, among others, the grandparents and grandchildren of persons in the United States.

Thank you for your prompt attention to this matter.

Very truly yours,



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