

1 Scott J. Street (application for admission forthcoming)
2 JW HOWARD/ATTORNEYS, LTD.
3 201 South Lake Avenue, Suite 303
4 Pasadena, CA 91101
5 Tel.: (213) 205-2800
6 Email: sstreet@jwhowardattorneys.com

7 John W. Howard (application for admission
8 forthcoming)
9 JW HOWARD/ATTORNEYS, LTD.
10 600 West Broadway, Suite 1400
11 San Diego, CA 92101
12 Tel.: (619) 234-2842
13 Email: johnh@jwhowardattorneys.com

14 Warner Mendenhall (OH Bar No. 0070165)
15 (District of Maryland Bar No. 30433)
16 Mendenhall Law Group
17 190 N. Union Street, Suite 201
18 Akron, OH 44304
19 Tel.: (330) 535-9160
20 E-Mail: warner@warnermendenhall.com

21 Attorneys for Plaintiffs
22 BENJAMIN COLLINS *et al.*

23 **UNITED STATES DISTRICT COURT**
24 **DISTRICT OF MARYLAND**

25 BENJAMIN COLLINS, BINGBING
26 YU, and HEALTH FREEDOM
27 DEFENSE FUND, a Wyoming non-
28 profit public benefit corporation,

Plaintiffs,

vs.

UR JADDOU, in his official capacity as
Director of U.S. Citizenship and
Immigration Services, and MANDY
COHEN, in her official capacity as
Director of the Centers for Disease
Control,

Defendants.

Case No. 1:24-cv-03330-ELH

[Assigned to Hon. Ellen L. Hollander]

**DECLARATION OF LESLIE
MANOOKIAN**

[Filed concurrently with Declarations of
Scott J. Street, Ram Duriseti, Benjamin
Collins and Bingbing Yu]

JW HOWARD/ ATTORNEYS, LTD.
600 WEST BROADWAY, SUITE 1400
SAN DIEGO, CALIFORNIA 92101

DECLARATION OF LESLIE MANOOKIAN

I, Leslie Manookian, declare as follows:

1. I am over the age of 18 and the executive director of Health Freedom Defense Fund (“HFDF”), a plaintiff in this lawsuit. I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called to do so. I am submitting this declaration in support of our motion for a preliminary injunction to prevent the United States Citizenship and Immigration Services from denying Bingbing Yu’s intended application for lawful permanent residence due to her inability to provide proof of vaccination against COVID-19, as well as our request that the Court extend that injunction nationwide to protect people who are similarly situated to Ms. Yu and her family.

2. HFDH is a not-for-profit public benefit Wyoming corporation with its headquarters in Ketchum, Idaho. HFDF is a member-supported organization that seeks to advocate for and educate the public on the topics of medical choice, bodily autonomy, and self-determination, and that opposes laws and regulations that force individuals to submit to the administration of medical products, procedures, and devices against their will. HFDF’s supporters include people across the United States who are directly affected by the subject actions of Defendants. They could have joined this suit but have chosen to rely on HFDF to represent their interests in this case. The interests at stake in this case fall within HFDF’s mission. Neither the claims asserted by HFDF, nor the relief requested by it, require the individual participation of its supporters.

3. HFDF has been especially active since the COVID-19 pandemic started. That includes advocating for, and supporting, people who declined to take the COVID-19 shot.

4. During the fall of 2021, the federal government added COVID-19 to the list of “vaccine-preventable diseases” that people seeking green cards must show

JW HOWARD/ ATTORNEYS, LTD.
600 WEST BROADWAY, SUITE 1400
SAN DIEGO, CALIFORNIA 92101

1 proof of vaccination against. as of October 1, 2021. HFDF has been advocating
2 against that action since then, as there was ample evidence even back in 2021 that the
3 COVID-19 shot did not prevent people from being infected with the virus that causes
4 COVID-19.

5 5. That evidence has grown since then. In fact, the evidence is now
6 overwhelming.

7 6. Despite this fact, the CDC has not withdrawn its recommendation of
8 COVID-19 as being a “vaccine-preventable disease” that can be required for
9 immigration purposes. And the USCIS continues to deny relief to people who have
10 not taken the COVID-19 shots, including Ms. Yu.

11 7. But she is not the only one. HFDF has been contacted by dozens of
12 people who were denied green cards purely because they could not show proof of
13 vaccination against COVID-19. I believe there are hundreds, if not thousands, more.
14 People are still being denied green cards today for that reason, and that reason alone.
15 Families are being separated, too. I know of at least one family who was planning to
16 move to the United States this month or next, but the father must stay in New Zealand
17 because he has not taken the COVID-19 shot, and he is being barred from entry by the
18 government’s policy. And I am informed and believe that this policy will continue this
19 year if a court does not stop it.

20 Under penalty of perjury, under the laws of the United States of America, I
21 declare that the foregoing is true and correct. Executed this 13th day of January 2025 at
22 Ketchum, Idaho.

23
24 *Leslie Manookian*

25 Leslie Manookian
26
27
28