

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN FRIENDS SERVICE
COMMITTEE; CENTER FOR
CONSTITUTIONAL RIGHTS; HUMAN
RIGHTS WATCH; and OPEN SOCIETY
INSTITUTE,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; UNITED
STATES DEPARTMENT OF STATE; MARCO
A. RUBIO, in his official capacity as Secretary
of State; UNITED STATES DEPARTMENT
OF THE TREASURY; SCOTT K. H.
BESSENT, in his official capacity as Secretary
of the Treasury; UNITED STATES
DEPARTMENT OF JUSTICE; TODD
BLANCHE, in his official capacity as United
States Attorney General; OFFICE OF FOREIGN
ASSETS CONTROL; and BRADLEY T.
SMITH, in his official capacity as Director of
the Office of Foreign Assets Control,

Defendants.

Civil Action No. 26-cv-6830-JMF

**DECLARATION OF JOYCE AJLOUNY ON BEHALF OF
THE AMERICAN FRIENDS SERVICE COMMITTEE
IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Joyce Ajlouny, hereby declare as follows:

1. I make this declaration on behalf of the American Friends Service Committee (“AFSC”), plaintiff in the above-captioned action.

2. I am the General Secretary of AFSC and have held this position since September 2017. I am a third-generation practicing Quaker, a member of the Bethesda Friends Meeting and

the Baltimore Yearly Meeting, and the former head of the Ramallah Friends School in Ramallah, Palestine.

3. I am a citizen of the United States.

4. The facts I am testifying to on behalf of AFSC in this declaration I make either through (a) my personal knowledge, (b) spiritual grounding in the testimonies, beliefs, and spirit-led social witness of the Religious Society of Friends (Quakers), (c) a review of documents in the custody or control of AFSC, (d) discussions with AFSC staff, or (e) some combination of these sources.

I. Background on American Friends Service Committee

5. AFSC is a Quaker organization founded in 1917 during World War I to provide a means of alternative service for conscientious objectors. Emerging from the Quaker religious conviction that faith requires both a rejection of violence and active service to those harmed by war and conflict, AFSC was created to put those beliefs into practice. AFSC's principal office is located in Philadelphia, Pennsylvania. It operates over 20 programs across the United States, including in Washington, DC, and at the United Nations in New York City, and operates 16 offices in various locations in Africa, Asia, the Middle East, and Latin America.

6. AFSC is incorporated as a Pennsylvania nonprofit corporation and is exempt from taxation under Section 501(c)(3) of the Internal Revenue Code. AFSC's governing body, the Corporation, is comprised solely of members of the Religious Society of Friends (Quakers), including representatives appointed by regional associations of Quaker congregations known as Yearly Meetings and "at-large" members. The Corporation approves and appoints a Board of Directors to oversee the strategic direction of AFSC. The chief executive officer of AFSC is required to be a Quaker and is referred to by the title of General Secretary.

7. AFSC's work is a direct exercise of the religious convictions of the Religious Society of Friends. The Quaker faith is animated by core religious testimonies, including peace, equality, community, integrity, simplicity, and the just stewardship of resources. The central belief of Quaker spirituality is a belief in the "inner light," or the presence of the divine, in every human being. These religious commitments compel Quakers to bear "social witness" in the world, including through peacebuilding, humanitarian service, advocacy, and the promotion of human dignity. AFSC's social witness belief has deep roots in Quaker theological tradition of nonviolence, reconciliation, and the peaceful resolution of conflict. From its earliest days, the Religious Society of Friends has believed that bearing social witness is an integral part of religious life. George Fox, the founder of the Quaker movement, instructed Friends in 1656 to "be patterns, be examples in all countries, places, islands, nations, wherever you come, that your carriage and life may preach among all sorts of people, and to them."¹ This instruction has guided Quaker service for nearly four centuries.

8. AFSC's programmatic work is a direct manifestation of its religious beliefs. AFSC sincerely regards its work—including its commitment to peace and human rights in the Middle East, and in particular the occupied Palestinian territory—as an exercise of Quaker religious convictions, not merely secular advocacy. AFSC's work to honor the inner light in every human is a direct expression of Quaker religious belief.

9. AFSC has been recognized for its humanitarian efforts globally. In 1947, AFSC and the British Friends Service Council jointly received the Nobel Peace Prize on behalf of Quakers worldwide, for their relief work in Europe during and after World War II.

¹ Letter from George Fox to Friends in the Ministry (1656), *available at* <https://tractassociation.org/to-friends-in-the-ministry/>.

10. As part of its broader commitment to peace, nonviolence, and human rights, AFSC advocates for the rights of all people seeking protection from, and accountability for, war crimes, crimes against humanity, and genocide. This commitment is rooted in AFSC's religious convictions and founding purpose. For AFSC, promoting accountability for such grave violations is a direct expression of the Quaker belief that every person bears the divine light and possesses inherent worth and dignity.

II. AFSC's Relationships with Al-Haq, Al Mezan, and UN Special Rapporteur Francesca Albanese Prior to their Designations

11. AFSC's programmatic work in the occupied Palestinian territory has long depended on close partnerships with Palestinian civil society organizations. AFSC has maintained international presence in the occupied Palestinian territory since 1948, and its programming is entirely dependent on relationships with Palestinian civil society organizations that possess the unique institutional knowledge and grassroots on-the-ground access that AFSC, as a U.S.-based organization, fundamentally lacks and cannot replicate. These partnerships are rooted in the Quaker religious testimony of integrity, which demands that AFSC's work be grounded in a true understanding of conditions on the ground in the communities it serves.

12. Among the most important of these partnerships were AFSC's relationships with Al-Haq: Law in the Service of Man ("Al-Haq"), based in the West Bank, and the Al Mezan Center for Human Rights ("Al Mezan"), based in Gaza.

13. Prior to the designation of Al-Haq on September 4, 2025, AFSC had maintained a close relationship with Al-Haq for over 20 years. AFSC staff frequently met with Al-Haq representatives. During such meetings, AFSC obtained information used in its research and advocacy work, and in sharing perspectives from Palestine with other Quaker religious bodies,

who look to AFSC to deepen their understanding and social witness. AFSC also obtained from Al-Haq introductions to other human rights organizations in the West Bank.

14. AFSC had likewise maintained a close relationship with Al Mezan for approximately 20 years. Prior to Al Mezan's designation on September 4, 2025, AFSC staff routinely met with Al Mezan representatives. During such meetings, AFSC obtained from Al Mezan information concerning the human rights situation in Gaza. On occasion, AFSC covered expenses for joint activities.

15. Prior to their designations, AFSC relied on Al-Haq and Al Mezan to supplement its research and to assist it in networking with other human rights organizations in the occupied Palestinian territory. AFSC also engaged in advocacy campaigns with Al-Haq and Al Mezan. Among other things, AFSC's partnerships with those organizations included the following:

- a. In 2012, AFSC organized a conference in Turkey on economic activism as a nonviolent tactic for social change at which Al Mezan staff gave a presentation.
- b. In 2019, AFSC staff organized a conference in South Africa on the impact of counter-terror law on civil society, in which Al Mezan staff participated.
- c. In 2020, AFSC relied on reporting provided to AFSC by Al-Haq to conduct research to support a social responsibility campaign on corporate activity in the Atarot settlement industrial zone in East Jerusalem. That campaign continued until 2022.
- d. In 2021, AFSC staff participated in a meeting of business and human rights experts convened by Al-Haq to coordinate advocacy and submissions to the UN Database of Business Enterprises Pursuant to U.N. Human Rights Council

Resolutions 31/36 and 53/25.² Following that meeting, AFSC and Al-Haq collaborated to refine and update Al-Haq's Investors' Guidelines on Business and Human Rights in the occupied Palestinian territory.

- e. In 2022, AFSC and 197 other regional and international civil society organizations, including Al-Haq, Al Mezan, and Palestinian Centre for Human Rights ("PCHR"), sent an open letter to ICC Prosecutor Karim Khan, urging him to investigate crimes committed in the Occupied Palestinian Territory.
- f. In 2023, AFSC and Al-Haq participated in a network of human rights organizations preparing submissions in response to a Call for Input by UN Special Rapporteur Francesca Albanese, as described more fully below in paragraph 17(a).
- g. In 2023, AFSC and Al-Haq participated in a coalition of human rights organizations as part of a global effort to advocate for an international treaty that would regulate transnational corporations.
- h. In 2023, AFSC organized an educational workshop on the occupied Palestinian territory and hosted Al Mezan's executive director as a guest speaker.
- i. In 2024, AFSC coordinated with Al-Haq staff on research to support AFSC's Boycott Chevron campaign.

² See U.N. High Comm'r for Hum. Rts., Database of Business Enterprises Pursuant to Human Rights Council Resolutions 31/36 and 53/25, U.N. Doc. A/HRC/60/19 (Sept. 26, 2025) ("*Request[ing]* the United Nations High Commissioner for Human Rights, in close consultation with the Working Group on the issue of human rights and transnational corporations and other business enterprises, in follow-up to the report of the independent international fact-finding mission to investigate the implications of the Israeli settlements on the civil, political, economic, social and cultural rights of the Palestinian people throughout the Occupied Palestinian Territory, including East Jerusalem, and as a necessary step for the implementation of the recommendation contained in paragraph 117 thereof, to produce a database of all business enterprises involved in the activities detailed in paragraph 96 of the afore-mentioned report, to be updated annually, and to transmit the data therein in the form of a report to the Council at its thirty-fourth session").

16. In addition to its partnerships with Palestinian civil society organizations, AFSC maintained a working relationship with Francesca Albanese, the United Nations Special Rapporteur on “the situation of human rights in the Palestinian territory occupied since 1967.” AFSC’s relationship with Ms. Albanese began in 2023 and was directly connected to AFSC’s programmatic work on corporate accountability and human rights in the occupied Palestinian territory.

17. AFSC’s interactions with Ms. Albanese included the following:

- a. In 2023, AFSC responded to a Call for Input published by Ms. Albanese seeking information to be included in a report she was preparing on the impact of business enterprises on violations of international law and human rights in the occupied Palestinian territory. Between August and September of 2023, AFSC liaised with Al-Haq to prepare a submission for that report.
- b. In October 2023, AFSC helped to coordinate, and participated in, a meeting between Ms. Albanese and an Israeli human rights organization. Following that meeting, AFSC shared research and reports with Ms. Albanese that AFSC prepared on corporate complicity in human rights abuses in the occupied Palestinian territory.
- c. In December 2023, Ms. Albanese facilitated introductions between AFSC staff and Chris Sidoti, a Commissioner of the Commission of Inquiry into the occupied Palestinian territory, which had been established by the UN Office of the High Commissioner for Human Rights. AFSC thereafter submitted materials to Mr. Sidoti for inclusion in the Commission of Inquiry’s report entitled “Legal analysis of the conduct of Israel in Gaza pursuant to the

Convention on the Prevention and Punishment of the Crime of Genocide,” which was published on September 16, 2025.

- d. In November 2024, AFSC staff met with Ms. Albanese and several of her staff members. Following that meeting, AFSC provided research and information in connection with her report to the UN Human Rights Council’s 59th Session (June 2, 2025) entitled “From Economy of Occupation to Economy of Genocide.” That report cited AFSC material at several points.

III. Impact on AFSC of EO 14,203 and the Designations Thereunder

18. Compliance with EO 14,203 and the designations thereunder is a requirement that severely constrains AFSC’s ability to carry out its core responsibilities and objectives for the protection of human rights.

19. Executive Order 14,203 and the subsequent designations of Al-Haq, Al Mezan, and Ms. Albanese thereunder, have significantly disrupted AFSC’s ability to serve its mission and carry out its programmatic work. In particular, the threat of enforcement of IEEPA’s civil and criminal penalties has caused AFSC to discontinue activities it was previously performing before those parties were designated, and abandoned or reconsidered future acts that AFSC planned to undertake.

20. Acts that AFSC had planned to undertake, but which it discontinued, abandoned, or reconsidered in light of Executive Order 14,203 and the designations of Al-Haq, Al Mezan, and Ms. Albanese thereunder, include:

- a. Engaging or collaborating with the designated persons in any capacity, which has significantly hampered AFSC’s religious mission and prevented it from being able to benefit from information, research, expertise, and connections

provided by Al-Haq, Al Mezan, and Ms. Albanese, including in regard to AFSC's advocacy efforts.

- b. Providing specialized advice to the designated NGOs, in the form of expertise in the Boycott, Divest, and Sanction movement and on research on the Israeli military and arms trade.
- c. Planning initiatives and hosting events in collaboration with Al-Haq or Al Mezan. For example, AFSC coordinated an event in New York City on September 12, 2025, to coincide with a meeting of the UN General Assembly. Representatives from Al-Haq had been scheduled to speak at that event but were forced to cancel their attendance. Al-Haq's forced absence lessened the impact and significance of that event by depriving participants of their valuable perspective.
- d. Collaborating with Ms. Albanese and contributing research and information for inclusion in her reports to the UN Human Rights Council.

21. Because AFSC had relied on Al-Haq and Al Mezan to facilitate introductions and coordinate with other Palestinian organizations, human rights defenders, and victims of human rights violations, the inability to maintain these connections prevents AFSC from fulfilling the Quaker religious obligation of bearing witness to conditions on the ground in the communities it serves.

22. Actions described above would have been performed by AFSC while some of their staff were located in the United States and their speech would have been communicated to recipients in other countries via the Internet or telephonically.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Philadelphia, Pennsylvania on August 28, 2026.



Joyce Ajlouny