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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

THE STANFORD DAILY PUBLISHING  
CORPORATION, JANE DOE, and JOHN  
DOE,

*Plaintiffs,*

v.

MARCO RUBIO, in his official capacity as  
Secretary of State, and

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security,

*Defendants.*

Case No. 5:25-cv-06618-NW

**NOTICE OF DECLARATIONS OF GARRY  
KASPAROV AND URIEL EPSHTEIN  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR PRELIMINARY INJUNCTION AND  
PRELIMINARY FACTUAL FINDINGS  
AND LEGAL CONCLUSIONS**

PLEASE TAKE NOTICE that Plaintiffs submit the declarations of Garry Kasparov and Uriel Epshtein in further support of their Motion for Preliminary Injunction (Dkt. No. 11).

Dated: August 11, 2025

Respectfully Submitted,

/s/ *Conor T. Fitzpatrick*

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a true copy of the foregoing and attached documents were served upon all parties with copies sent to the below addresses via USPS certified mail on August 11, 2025.

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Secretary of Homeland Security Kristi Noem  
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/s/ Daniel A. Zahn  
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**DECLARATION OF GARRY KASPAROV  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR PRELIMINARY INJUNCTION AND  
PRELIMINARY FACTUAL FINDINGS  
AND LEGAL CONCLUSIONS**

1 I, Garry Kasparov, declare as follows:

2 1. I was born in the Soviet Union. Since 2013, when I was forced to flee political  
3 persecution, I have legally resided in the United States.

4 2. I am known to the public, in part, for chess. I became the youngest world chess  
5 champion in history at the age of 22 and was the world's No. 1 ranked chess player for two decades.

6 3. I later become known as an outspoken critic of Vladimir Putin and his policies in  
7 Russia.

8 4. In 2005 I founded the United Civil Front in Russia, a movement that seeks to  
9 challenge the consolidation of power in Russia and to return the country to free and fair elections.

10 5. My public opposition to Mr. Putin and his allies required me to leave Russia in 2013  
11 to avoid threats to my safety because of my dissent and opposition.

12 6. In 2017 I founded The Renew Democracy Initiative, Inc. ("RDI"), a United States-  
13 based nonprofit whose mission is to confront dictators threatening freedom around the world. I serve  
14 as chairman of RDI.

15 7. RDI furthers that mission in part through our Frontlines of Freedom program, a  
16 network of dissidents from different countries who, like me, share with the public their firsthand  
17 accounts of fighting against authoritarians, including through speeches and articles that RDI  
18 publishes.

19 8. As a dissident forced to flee an authoritarian regime, I know what authoritarianism  
20 looks like. I know from experience that freedom of expression is vital for a healthy democracy and  
21 for fighting authoritarianism. And I know from experience that suppressing dissenting viewpoints  
22 is a key part of how authoritarians amass and maintain power.

23 9. When the Trump administration began targeting noncitizens lawfully present in the  
24 United States based on their protected speech in March 2025, I was gravely alarmed. Even though  
25 I personally disagree with much of the targeted noncitizens' speech on topics like Israel, I know  
26 from experience that speech-based retaliation silences not only those targeted, but others who might  
27 wish to express any unpopular viewpoint or to criticize the government.

1           10. I have seen that chilling effect within RDI itself. Many of the dissidents in RDI's  
2 Frontlines of Freedom program now reside in the United States on green cards or visas after fleeing  
3 their home countries fearing political violence and retribution. Since March 2025, these dissidents  
4 have been increasingly afraid to share their views on American foreign policy or about the United  
5 States government, fearing it will target them next, revoke their immigration documents, and deport  
6 them.

7           11. Protecting the freedom to dissent — wherever one lives, and regardless of where one  
8 claims their citizenship — is vital to protecting democracy around the world and here in the United  
9 States.

10           I declare under penalty of perjury that the foregoing is true and correct.

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12           Executed on August 08, 2025.

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A handwritten signature in black ink, appearing to read 'Garry Kasparov', is written over a horizontal line.

Garry Kasparov

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**DECLARATION OF RENEW  
DEMOCRACY INITIATIVE CEO URIEL  
EPSHTEIN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION AND  
PRELIMINARY FACTUAL FINDINGS  
AND LEGAL CONCLUSIONS**

1 I, Uriel Epshtein, declare as follows:

2 1. I am the CEO of The Renew Democracy Initiative, Inc. (“RDI”), a 501(c)(3)  
3 nonprofit organization founded by Garry Kasparov, based in Washington, D.C.

4 2. RDI’s mission is to “unmask and confront the alliance of dictators threatening  
5 freedom around the world. By doing so, we inspire those in the United States and in other free  
6 countries to value and protect their own democracies.” RDI advances that mission through  
7 education, advocacy, action, and community building.

8 3. One of the ways RDI advances its mission is through its Frontlines of Freedom  
9 program, a network of over 100 dissidents from approximately 40 countries. These “Frontline  
10 Fellows” foster professional, personal, and political support for one another and the global pro-  
11 democracy movement.

12 4. Frontline Fellows share—with each other and the public, including through  
13 professional speeches and articles on RDI’s website—firsthand accounts of fighting against  
14 authoritarians.

15 5. Many of the dissidents now reside in the United States on green cards or visas after  
16 fleeing their home countries fearing political violence and retribution.

17 6. Beginning in March 2025, when the Trump administration began targeting  
18 noncitizens lawfully present in the United States for deportation based on protected “anti-American”  
19 speech and protected speech supposedly compromising American “foreign policy,” noncitizen  
20 Frontline Fellows lawfully in the United States became increasingly afraid to publicly share their  
21 views on and criticisms of American foreign policy, fearing visa or green card revocation or  
22 deportation because of their speech.

23 7. Since March 2025, many Frontline Fellows who are not citizens of the United States  
24 but are lawfully present have self-censored and declined to make public remarks or publish articles  
25 critical of the Trump administration’s foreign policy for fear of adverse immigration consequences.

26 8. For example, a Frontline Fellow asked for the removal from RDI’s website of videos  
27 featuring them speaking on threats facing American and global democracy and the importance of  
28



1 opposing dictators around the world, including Russian dictator Vladimir Putin. We complied with  
2 their wishes and removed the relevant videos.

3 9. But for the threat of visa revocation and deportation, the Fellow would not have asked  
4 for removal of the videos from RDI's website.

5 10. Another Frontline Fellow self-censored by refraining from writing and publishing  
6 articles focused on their perceptions of threats facing American democracy for fear of adverse  
7 immigration consequences.

8 11. But for the threat of visa revocation and deportation, the Fellow would have written  
9 and published the article.

10 12. Another Frontline Fellow asked for the removal of their name from RDI's website  
11 because they were concerned that affiliation with a group such as ours, which has been critical of  
12 the current administration, could cause adverse immigration consequences. We respected their  
13 wishes and removed their name.

14 13. But for the threat of visa revocation and deportation, the Fellow would not have  
15 requested their name be removed from RDI's website.

16 14. This chilling of expression directly harms RDI's ability to fulfill its mission, which  
17 is to allow dissidents to voice opinions on the benefits of democracy and the harms of  
18 authoritarianism, especially by commenting on the erosion of democracy in the United States.

19 15. I, along with others at RDI, do not agree with the opinions voiced by students whose  
20 immigration status the Trump administrations has targeted. But our first-hand experience is that  
21 permitting the government to target noncitizens for protected "anti-American" speech and speech  
22 contrary to American "foreign policy" leads to self-censorship by noncitizens on all issues of  
23 American foreign policy, including America's foreign policy towards Russia, China, and Latin  
24 America.

25 I declare under penalty of perjury that the foregoing is true and correct.  
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Executed on August 11, 2025.



Uriel Epshtein