

EXHIBIT 1-C

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

RÜMEYSA ÖZTÜRK,

Petitioner,

v.

DONALD J. TRUMP, et al.,

Respondents.

C.A. No. 25-374-WKS

DECLARATION OF ELIZABETH GOSS, ESQ.

I, Elizabeth Goss, declare the following under pain and penalty of perjury:

1. I am over 18 years of age and am fully competent to make this declaration. I have over 25 years of experience as a licensed immigration attorney. I earned my Juris Doctor in 1999, received bar admission in Massachusetts (1999) and New York (2000) and have practiced immigration law since that time. I am also admitted in the U.S. District Court for the District of Massachusetts.

2. Prior to practicing law, I worked at Tufts University as an Advisor and served as the Designated School Official and Responsible Officer (“DSO/RO”), and later as the Director of the Health Sciences Campus- International Students & Scholars office, from 1993 to 1999. In these positions I was responsible for managing all aspects of immigration benefits for F/J/H1B/TN/O-1 visa and Legal Permanent Resident cases.

3. I was also a founding member of NewFront Software that created fsaATLAS, one of the first software programs designed for institutional use to interface with the SEVIS system. Our company worked with the former Immigration and Naturalization Service (“INS”) to ensure communication between the F/J visa programs and the government’s Student and Exchange

Visitor Program (“SEVP”). In 2003, fsaATLAS was acquired by Sungard-SCT (which merged into Ellucian), and the product was renamed "Ellucian ISSM," which is still in use today.

4. Since obtaining my license in December of 1999, I have specialized in immigration law, and specifically in academic immigration. In my practice, I have consulted with thousands of students regarding their immigration status, and have represented hundreds of students in proceedings to correct or mitigate problems with their F-1 visas.

5. Since 1993, I have been a member of NAFSA: Association of International Educators, a nonprofit association dedicated to international education and exchange. I have been a member of the American Immigration Lawyers Association (“AILA”) since 2000. As a member of NAFSA and AILA, I have served in various national leadership roles and providing guidance to members on academic immigration issues, including through practice advisories, speaking engagements, and book chapter contributions. For example, I recently co-authored the chapter “O Nonimmigrants” in the 2022-23 edition of AILA’s publication “Navigating the Fundamentals of Immigration Law.”

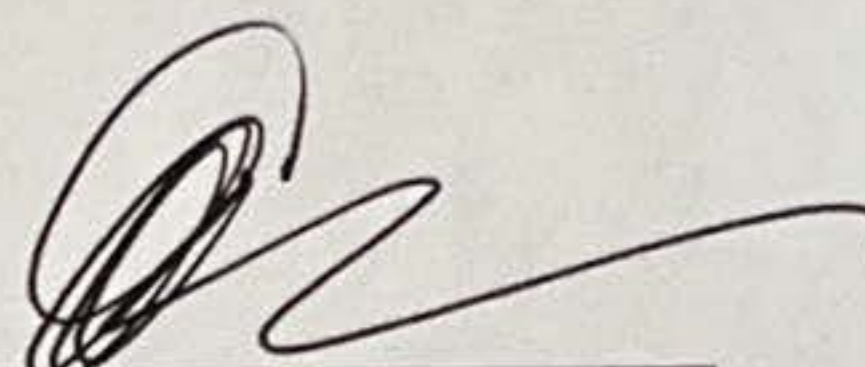
6. My immigration law practice focuses on academic, medical, business, and family immigration, with expertise in F-1 and J-1 visa categories, their derivatives, and institutional sponsorship obligations — including detailed knowledge of the F-1 international student program, the Student and Exchange Visitor Information System (SEVIS), and the laws, regulations, and legal guidance related to SEVIS and international students in F-1 status. I have represented both students and institutions in relation to SEVIS compliance and record termination requirements and reinstatement applications.

7. In my experience, it is highly unusual for ICE or any other agency to detain a student in connection with the termination of a SEVIS record. I have never seen an arrest based on the termination of a SEVIS record.

8. In my experience, it is highly unusual for ICE or any other agency to detain a student in connection with an F-1 visa revocation. I have never seen a student arrested based on a visa revocation.

9. I am not a party to this action or proceeding. I am aware of the facts stated herein of my own knowledge, and, if called to testify, I could and would competently so testify.

Executed on May 2, 2025, in Boston, MA.

/s/ 
Elizabeth Goss