UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

COALITION FOR INDEPENDENT TECHNOLOGY RESEARCH, Plaintiff, v. MARCO RUBIO, *et al.*, Defendants.	Civil Action No. 26-815 (JEB)

DECLARATION OF LARRY W. TALBOTT

I, Larry W. Talbott, hereby declare under penalty of perjury:

1. I am employed by the United States Department of State, Bureau of Consular Affairs, Visa Office, Office of Information Management and Liaison. The facts attested to herein are based upon my personal knowledge and upon information provided to me in my official capacity.

2. I am familiar with the visa restriction policy announced by the Secretary of State on May 28, 2025 to "apply to foreign nationals who are responsible for censorship of protected expression in the United States" under Section 212(a)(3)(C) of the Immigration and Nationality Act.

3. The attached action memorandum dated May 23, 2025 (the "Policy"), represents the Secretary of State's approval of the policy under Section 212(a)(3)(C) to restrict visa issuance for foreign nationals who are responsible for, or complicit in, censorship or attempted censorship of protected expression in the United States, and the immediate family members of such persons. This is the same policy announced on May 28, 2025.

4. Certain material in the last two paragraphs of the attached action memorandum, both of which are marked "SBU" for sensitive but unclassified information, has been redacted for three reasons: (a) the information contains implementation details unrelated to the Policy's scope, (b) it describes internal and deliberative decision making and (c) it is subject to deliberative process privilege.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1476, that the foregoing is true and correct to the best of my knowledge.

Larry W. Talbott
Deputy Director
Office of Information Management and Liaison
Visa Office, Bureau of Consular Affairs
U.S. Department of State