

Exhibit 1

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

L.C., a minor child, by and through her father MASSIMILIANO CALI,)	
)	CIVIL ACTION
)	
)	
MASSIMILIANO CALI,)	No. 1:26-cv-00688-RJL
<i>Plaintiffs,</i>)	
)	
v.)	
)	DATE: March 23, 2026
DONALD J. TRUMP, <i>et al.</i> ,)	
<i>Defendants.</i>)	
)	
)	
)	

DECLARATION OF MASSIMILIANO CALI

I, Massimiliano Cali, declare as follows:

1. My name is Massimiliano Cali. I am over the age of 21, of sound mind, capable of making this Declaration, and personally acquainted with the facts herein stated. The facts stated herein are based upon my personal experience and if called upon to do so in court I could and would testify thereto.

2. In its brief in opposition to our motion for a preliminary injunction, the Defendants accuse us of “delay” and say that the months between Francesca’s designation in July 2025 and the filing of our suit in February 2026 shows that the sanctions are not causing us serious harm. The purpose of this declaration is to describe the reason that we filed this suit, seeking to end the sanctions against my wife, Francesca Albanese, in February 2026.

3. The timeline below outlines the steps we took to ameliorate the impact of the sanctions and to have Francesca’s designation removed.

4. In sum, Francesca’s designation came as a complete surprise and over time it has made the life of our family really difficult. We sought the assistance of the United Nations, which for months led us to believe that it would come to our assistance, both in mitigating the effects of the sanctions and seeking to have the sanctions removed. This proved not to be true, which was only made clear to us in December 2025. It then took the United Nations another month to act on Francesca’s request to seek delisting in her own name, it denied. Once confronted with the need to act on our own, and after the cumulative effect of the sanctions had created severe impediments to our daily lives and the health of our family, we authorized the filing of this suit.

5. On or about July 9, 2025, I learned that Secretary of State Marco Rubio personally designated Francesca as a Specially Designated National (“SDN”) under the sanctions program that President Donald Trump created to target the work of the International Criminal Court (“ICC”). Francesca does not work for the ICC and as a UN independent expert, she is protected by the UN Convention on Privileges and Immunities in the exercise of her functions; we had not considered that this was a possibility until after it was announced.

6. Neither Francesca, nor I, had any experience with sanctions and were neither aware of not prepared to deal with the consequences of her being designated. We immediately contacted the UN and simultaneously contacted a lawyer in the United States, who specializes in sanctions law, who explained the meaning and consequences of Francesca’s designation, financial and otherwise.

7. On or about July 18, 2025, Francesca was removed from our joint US bank account (with Bank Fund Staff Federal Credit Union). Francesca had no other bank accounts.

8. On or about July 19, 2025, Francesca applied to open a bank account with Banca Etica, a bank in Italy.

9. On or about July 24, 2025, Francesca attended a meeting with the United Nations Office of Legal Advisor (“OLA”). At this meeting she asked what assistance the United Nations would provide, including approaching Member States to allow her to open a bank account, starting with Switzerland as host country for the Human Rights Council. She also asked what efforts were being taken to have her designation rescinded, or to provide legal counsel through which she could seek her delisting through the Office of Foreign Asset Control (“OFAC”)’s administrative process or, if necessary, in the U.S. court system. OLA informed Francesca that it had sent a letter to the US Permanent Mission to the United Nations to assert her immunity from the sanctions. She was given reason to be hopeful that the United Nations would be able to have the sanctions removed. Francesca also sought support from OLA to proactively assert and defend her immunity as a UN Mandate Holder, including in courts if needed.

10. On or about July 30, 2025, we learned OFAC had blocked a hasty sale of our home in Washington, D.C., for which we had found a buyer in the weeks after the designation. OFAC’s response followed our lawyer’s communication of our intention to sell our home before the expiration of the 1-month grace period that the OFAC license provided to liquidate Francesca’s financial positions in the U.S. We are not wealthy people, and this home was and remains our major asset.

11. On or about August 12, 2025, the organization UN Watch, which has appeared as an amicus curiae in this case, began lobbying the World Bank, where I am a Senior Economist and where I have been employed since 2012, to terminate my employment. Among the reasons given was the alleged “reputational damage caused to the World Bank, headquartered in Washington, D.C., when Mr. Cali was recently banned from entering the United States, under Executive Order 14203, on account of statements made by his spouse targeting America and Israel[.]”

12. On or about August 19, 2025, Italy's Banca Etica declined to open a bank account for Francesca. Over the next four months, we unsuccessfully attempted, directly and through the UN, to engage several Italian, Dutch and Swiss banks to open a bank account for her.

13. On or about August 22, 2025, OFAC issued a specific license that permitted us to sell our home. However, the license was limited. Should we be able to sell our home, the funds we receive must be put into a frozen bank account.

14. Also on or about August 22, 2025, OFAC issued a license authorizing U.S. persons to engage in conduct that is "ordinarily incident and necessary" to Francesca's role as our daughter's mother, "including, but not limited to, health and medical expenses, transportation, telecommunication costs, housing costs, food, clothing, insurance, and legal fees and expenses." We did not seek this license. We were also informed that it offered little in the way of practical legal protection, insofar neither I, nor Francesca, are U.S. persons.

15. On or about September 1, 2025, Columbia University discontinued a three-year-old partnership under which students had externships with Francesca's mandate.

16. On or about October 1, 2025, Francesca attended another meeting with OLA, seeking guidance on whether the United Nations would aid Francesca in seeking to have her designation lifted. At this meeting, an attorney for Francesca sought to educate OLA about the administrative and legal processes available to designated individuals who seek delisting. OLA was unable to offer any firm commitments respecting what steps, if any, the United Nations was willing to undertake. OLA informed Francesca that there was a concern that participating in either administrative or judicial proceedings would be inconsistent with United Nations policy respecting the organization's immunity from the jurisdiction of national courts.

17. On or about October 21, 2025, another bank in Italy – Banca Fideuram – refused to open a bank account for Francesca.

18. On or about October 22, 2025, World Bank management informed me that, due to ongoing external pressure resulting from the sanctions, my position as Senior Country Economist for Syria was suspended only 3 months after starting it and I would be required to leave the organization’s Middle East, North Africa, Afghanistan, and Pakistan department by July 2026—three years earlier than my original end date of June 2029. The travel restrictions imposed on me by the U.S. sanctions severely constrained my options for future positions within the World Bank, as approximately half of the available vacancies—including several of my top choices—were located at the Washington, D.C. headquarters and thus inaccessible to me.

19. On or about October 31, 2025, the organization UN Watch, who has appeared as an amicus curiae in this case, began lobbying American publishers and book distributors (including Amazon) against publishing or distributing Francesca’s books in the United States because doing so would be a violation of the sanctions laws.

20. On or about November 11, 2025, Francesca and I attended another meeting with OLA seeking guidance on whether the United Nations would aid Francesca in seeking to have her designation lifted. OLA stated that it was consulting counsel from the law firm of Curtis, Millet Colt & Mosle, whom it had retained to represent UNRWA in civil litigation brought in the Southern District of New York, and to represent Francesca in a case brought by activists in the District of Colorado. OLA indicated that it was considering retaining Curtis to seek Francesca’s delisting through OFAC.

21. On or about November 18, 2025, Carlson-Wagonlit Travel, the official travel agency of the European Parliament, cancelled Francesca’s travel reservations due to the sanctions. This

risked interfering with her ability to address the European Parliament. Since then several organizers of events where Francesca was due to speak informed her that they have been unable to book rooms in her name.

22. On or about November 21, 2025, Francesca and I attended yet another meeting with OLA seeking guidance on whether the United Nations would provide assistance to Francesca in seeking to have her designation lifted. OLA stated that it was continuing to deliberate on what, if any, steps the United Nations was prepared to take to assist Francesca. Francesca asked whether the United Nations would provide her the needed authorization to proceed in her individual capacity if the United Nations was not willing to authorize Curtis to seek her delisting. OLA said that it would consider the request. Francesca asked for a prompt decision given the financial and personal consequences the sanctions were having on our family.

23. On or about November 24, 2025, my employer-sponsored health insurer, Aetna International, informed me that it refused to pay for Francesca's health expenses. The health insurer specifically cited the sanctions against Francesca as its reason for terminating coverage. We unsuccessfully attempted to appeal this decision.

24. On or about December 1, 2025, Francesca learned that Georgetown University, where Francesca had been an affiliated scholar, terminated its decade-old affiliation with her and blocked her from her email address (which had become her primary email account) due to the sanctions designation against her.

25. On or about December 12, 2025, our lawyer conferred with lawyers from Curtis and learned that OLA did not intend to authorize Curtis to pursue Francesca's delisting through administrative or judicial processes. OLA had also not yet decided respecting whether it would authorize Francesca to seek delisting in her personal capacity.

26. On or about December 31, 2025, the organization National Jewish Advocacy Center joined UN Watch's campaign of lobbying American publishers and book distributors (including Amazon) against publishing or distributing Francesca's book in the United States because doing so would be a violation of the sanctions laws.

27. On or about January 12, 2026, we submitted a formal complaint to the Bank of Italy against Italian banks for not opening a bank account for Francesca.

28. On or about January 14, 2026, we finally received a response from OLA stating that "the United Nations is not in a position to authorize you to file suit in a United States court contesting the imposition of those sanctions."

29. On January 20, 2026, Francesca was diagnosed with stomach ulcers, which have been associated with her chronic headaches and stomach pain since August 2025. At the same time, I have been experiencing insomnia, and anxiety, due to the cumulative emotional and financial stress that the sanctions have imposed on our family. We were both prescribed medication.

30. On or about January 21, 2026, we authorized our lawyer to prepare to file this case.

31. On or about January 24, 2026, the American University of Beirut and the American Lebanese University canceled an event with Francesca because they could not "legally invite" her due to her designation.

32. On or about February 25, 2026, Southern Maine University cancelled a conference on Palestine, at which Francesca was to appear remotely, citing sanctions on Francesca.

33. Also on or about February 25, 2026, we authorized our lawyer to file this case.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 23, 2026

Massimiliano Cali

A handwritten signature in brown ink, appearing to read "Massimiliano Cali", written in a cursive style.