

EXHIBIT A

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1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF WASHINGTON
3 AT SEATTLE

4 ABDIQAFAR WAGAFE, *et al.*, on behalf
of themselves and others similarly situated,

No. 2:17-cv-00094-RAJ

5 Plaintiffs,

6 v.

7 DONALD TRUMP, President of the
United States, *et al.*,

8 Defendants.
9

10 **SUPPLEMENTAL DECLARATION OF SEAN M. KRUSKOL**

11 I, Sean M. Kruskol, hereby declare:

12 I make this declaration based on my own personal knowledge, and if called to testify, I could and
13 would do so competently as follows:

14 **I. Introduction**

15 **A. My Assignment**

16 1. I was engaged by counsel for the Plaintiffs to: 1) review, analyze, and compile summary
17 statistics related to Application to Register Permanent Residence or Adjust Status (“Form I-485”)
18 and Application for Naturalization (“Form N-400”) data provided by U.S. Citizenship and
19 Immigration Services (“USCIS”); and 2) review, merge, and analyze various lists of individuals
20 subject to a current USCIS program called the Controlled Application Review and Resolution
21 Program (“CARRP”).¹ I issued an Expert Report in this matter dated February 28, 2020
22 (“February Report”). My February Report contained certain opinions pertaining to Forms I-485
23 and N-400 applications using summary data provided by USCIS (“Original USCIS Data”).²
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26 ¹ For a more detailed discussion of background information relevant to this Supplemental Declaration, see my
February Report, ¶¶ 11–20.

² For a detailed description of the Original USCIS Data, see my February Report, ¶¶ 22–25.

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1 After I issued my February Report, data and information used to form my opinions in my
2 February Report were updated by USCIS. As a result, I issued a Supplemental Expert Report
3 dated July 17, 2020 (“Supplemental Report”). My Supplemental Report contained certain
4 opinions pertaining to Forms I-485 and N-400 applications using updated summary data
5 provided by USCIS and the underlying application data used to create the updated summary data
6 (“Updated USCIS Detailed Data”).

7 2. After I issued my first Supplemental Report, new information used to form my opinions
8 in my February Report and Supplemental Report became available through a Federal Rule of
9 Civil Procedure 30(b)(6) deposition regarding the Updated USCIS Detailed Data, including
10 information regarding a purported data error that was discovered by USCIS and that led to the
11 creation of the Updated USCIS Detailed Data. As a result, I issued a second Supplemental
12 Expert Report dated September 21, 2020 (“Second Supplemental Report”).

13 3. Since I issued my Second Supplemental Report, new data used to form my opinions in
14 my Second Supplemental Report was produced by Defendants in this matter. This new data and
15 information is related to concern types and sub-statuses of individuals purportedly subject to
16 CARRP (“CARRP Dataset”). As a result, I have been asked by Plaintiffs’ counsel to review and
17 analyze the CARRP Dataset pursuant to Federal Rule of Civil Procedure 26(e).

18 **B. Purpose of this Declaration**

19 4. On October 15, 2020, Plaintiffs filed a motion to compel production of certain data
20 related to the concern types and sub-statuses of individuals in USCIS’s FDNS-DS database.³ On
21 December 1, 2020, the Court ordered production of this data (“Court Order”).⁴ On January 8,
22 2021, defendants produced this data.

23 5. My findings and opinions are based on my education, training, professional experience,
24 and the list of documents/information considered and included in Exhibit BL. The documents I
25

26 ³ Plaintiffs’ Motion to Compel Statistical Data Under Fed R. Civ. P. 37(a)(3), filed 10/15/20.

⁴ Order Granting Plaintiffs’ Motion to Compel Statistical Data Under Fed R. Civ. P. 37(a)(3), filed 12/1/20.

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1 have considered include items such as pleadings, class lists, data from USCIS, two depositions
2 and related exhibits, and publicly available data and information. I was supported by a team of
3 professionals at Cornerstone Research working under my direction and supervision.

4 6. The opinions and analyses presented in this Declaration are based on currently available
5 information. If new information relating to my analyses or opinions becomes available, I may
6 need to modify this Declaration.

7 7. My current CV, including publications I authored within the past 10 years, is included as
8 Exhibit BJ. A list of matters in which I have provided expert testimony over the past four years
9 is included as Exhibit BK.

10 **II. Summary of Opinions**

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12 8. Based on the analyses I performed using USCIS's CARRP Dataset, I have reached the
13 following opinions regarding Concern Types identified by USCIS:

14 a. For applications received between October 1, 2012 and September 30,
15 2019, USCIS adjudicated 84% of applications identified as Non-NS, 14%
16 identified as Non-KST, and 1% identified as KST. The approval and denial rates
17 I calculated for these applications are as follows:

- 18 1. 86% of Non-NS applications were approved and 14% were denied;
- 19 2. 59% of Non-KST applications were approved and 41%, were
20 denied; and
- 21 3. 11% of KST applications were approved and 89% were denied.

22 These results are consistent in the aggregate and between Forms I-485 and N-400.

23 b. For applications received between October 1, 2012 and September 30,
24 2019, and pending as of September 30, 2019, USCIS identified 54% of these
25 applications as Non-KST, 41% as Non-NS, and 4% as KST. 1% of these
26 applications did not have a Concern Type prior to September 30, 2019.

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1 c. For applications received between October 1, 2012 and September 30,
2 2019, pending as of September 30, 2019, and identified as KST, applicants
3 awaited adjudication by USCIS on average 902 days. This is the longest average
4 number of days pending of the three Concern Types.

5 9. Based on the analyses I performed using USCIS's CARRP Dataset, I have reached the
6 following opinions regarding Sub-statuses identified by USCIS:

7 a. For applications received between October 1, 2012 and September 30,
8 2019, USCIS adjudicated 76% of applications identified as NS Concern Resolved,
9 10% identified as NS Not Confirmed, 7% identified as NS Concern Unresolved,
10 and 4% as NS Confirmed. The approval and denial rates I calculated for these
11 applications are as follows:

- 12 1. 86% of NS Concern Resolved applications were approved and 14%
13 were denied;
- 14 2. 73% of NS Not Confirmed applications were approved and 27%
15 were denied;
- 16 3. 60% of NS Concern Unresolved applications were approved and
17 40% were denied; and
- 18 4. 44% of NS Confirmed applications were approved and 56% were
19 denied.

20 These results are consistent in the aggregate and between Forms I-485 and N-400.

21 b. For applications received between October 1, 2012 and September 30,
22 2019, and pending as of September 30, 2019, USCIS identified 40% of these
23 applications as NS Concern Resolved, 42% as NS Not Confirmed, 13% as NS
24 Confirmed, and 4% as NS Concern Unresolved. Less than 1% of these
25 applications did not have a CME Sub-status, had a null value for a CME Sub-
26 status or had a Sub-status indicating the application was apparently returned to the

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1 “Field” or pending assessment as of September 30, 2019.

2 c. For applications received between October 1, 2012 and September 30,
3 2019, pending as of September 30, 2019, and identified as NS Confirmed,
4 applicants awaited adjudication by USCIS on average 848 days. This is the
5 longest average number of days pending of the Sub-statuses.

6 10. Based on my review and analysis of the CARRP Dataset, 70% of the applications that
7 were received between October 1, 2012 and September 30, 2019 had a Concern Type of Non-NS
8 and a Sub-status of NS Concern Resolved at the time of adjudication or as of September 30,
9 2019 for pending applications.

10 11. Based on my review and analysis of the CARRP Dataset and information produced to
11 date, I identified potential data anomalies such as applications that appear to have: 1) started the
12 CARRP review process as Non-NS, conflicting with the FDNS-DS User Guide; 2) Concern
13 Types and Sub-statuses that do not correspond to CME open dates; 3) no Concern Type or Sub-
14 status at the time of adjudication or as of September 30, 2019 for pending applications; and 4)
15 multiple Concern Type and/or Sub-status changes throughout the CARRP review process and, at
16 times, on the same day.

17 **III. Basis for Opinions**

18 **A. My Review and Analysis of Concern Type and Sub-status Data Provided by** 19 **USCIS**

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21 12. As a result of the Court Order, USCIS produced a dataset containing application
22 attributes such as NS concern type (“Concern Type”) and NS concern sub-status (“Sub-status”),
23 with associated dates, for each application USCIS identified as being subject to CARRP.
24 Consistent with previously produced data, this dataset relates to USCIS’s receipt of immigration
25 benefit applications for naturalization or adjustment of status for applications received between
26 Fiscal Year 2013 and Fiscal Year 2019 (October 1, 2012 and September 30, 2019). This dataset

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1 does not include applications USCIS identified as being subject to CARRP that were received
2 prior to October 1, 2012, even if these applications were adjudicated before September 30, 2019
3 or were pending as of September 30, 2019. In my Supplemental Report, I analyzed seven class
4 lists and calculated mean and median days pending for applicants included on these class lists.⁵
5 These class lists contained applications that were received prior to October 1, 2012 and were still
6 pending as of September 30, 2019.⁶

7 **1. Overview of CARRP Dataset**

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9 13. USCIS provided a granular dataset containing 28,214 records and 219 fields of
10 application and related USCIS data (“CARRP Dataset”). This granular dataset provides the
11 underlying Concern Type and Sub-status USCIS purportedly identified and used to determine
12 that 28,214 applications received between October 1, 2012 and September 30, 2019 were subject
13 to CARRP. The CARRP Dataset shows anonymized application and related USCIS details for
14 individuals filing Forms I-485 or N-400 from October 1, 2012 through September 30, 2019 and
15 purportedly subject to CARRP. These details include, but are not limited to:

- 16 a. Application Receipt Date (i.e., when an application was received by
17 USCIS);
- 18 b. Application Type (i.e., I-485 or N-400);
- 19 c. Application Status (e.g., approved, denied, pending, admin closed, and
20 withdrawn);
- 21 d. CME Date (i.e., date a National Security Concern (“NS Concern”) case
22 was opened or completed);
- 23 e. CME Concern Type (e.g., Known or Suspected Terrorist (“KST”), Non-
24 KST, and Non-NS) – including any change in Concern Type over time;

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26 ⁵ See my Supplemental Report, ¶ 58 and Exhibit AU.

⁶ See, for example, 9/30/19 class list, tab *Class List (as of 9-30-19)*, row 199, Alien number ending in -732 with an application receipt date of 3/11/10 for Form N-400.

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1 f. CME Sub-status (e.g., NS Concern Resolved, NS Concern Unresolved,
2 NS Confirmed, NS Not Confirmed) – including any change in Sub-status over
3 time; and

4 g. Last Application Status Date (i.e., the date of most recent Application
5 Status change).⁷

6 14. Using the anonymized identifier (“newid”) USCIS created for the Updated USCIS
7 Detailed Data I analyzed in my Supplemental and Second Supplemental Report, I was able to
8 confirm that the data values for any given record and field were consistent between the Updated
9 USCIS Detailed Data and CARRP Dataset.⁸ Fields that are present in the Updated USCIS
10 Detailed Data and CARRP Dataset include, but are not limited to: newid, Application Receipt
11 Date, Form Type, and Last Application Status Date. Additional fields that are present in the
12 CARRP Dataset but not present in the Updated USCIS Detailed Data include, but are not limited
13 to: CME Concern Type (e.g., KST, Non-KST) and CME Sub-status (e.g., NS Concern Resolved,
14 NS Concern Unresolved). My analysis of these additional data fields is described below.

15 2. My Calculation of General Summary Statistics

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17 15. The CARRP Dataset shows that USCIS purportedly subjected 28,214 applications to
18 CARRP for Forms I-485 and N-400 received from October 1, 2012 through September 30, 2019.
19 This is consistent with the number of applications purportedly subject to CARRP per the
20 Updated USCIS Detailed Data.⁹ The CARRP Dataset contains additional fields that are not
21 contained in the Updated USCIS Detailed Data. As a result, I am able to analyze approval and
22 denial rates by Concern Type and/or Sub-status for each application in the CARRP Dataset.
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24

25 ⁷ See USCIS_Data_Jan2020 - Confidential – Subject to Attorneys’ Eyes Only Protective Order.xlsb. See also,
26 jan_2021_data_dictionary – Subject to Attorneys’ Eyes Only Protective Order.xlsb.

⁸ This analysis is limited to the fields contained within both datasets.

⁹ See my Supplemental Report, Exhibit AB.

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a) My Analysis of USCIS’S Concern Type in the CARRP Dataset

16. The CARRP Dataset contains multiple fields related to Concern Type and the related applicable dates a given application was identified under one of USCIS’s Concern Types (e.g., CME_1_Final_Concern, CME_1_Final_Concern_DT). These fields provide a basis to determine the Concern Type of any given application at various dates after USCIS received an application and when an application was adjudicated or pending. Based on my review and analysis of the CARRP Dataset, I identified two potential methods to perform my analyses of Concern Type: 1) analyze adjudicated and pending applications based on Concern Type at the time of adjudication or September 30, 2019 for pending applications; or 2) analyze adjudicated and pending applications based on the most recent Concern Type identified for each record in the CARRP Dataset, even if that Concern Type was created after adjudication or after September 30, 2019 for pending applications. For example, the CARRP Dataset contains a record associated with “newid Z0AL3PR9GQ” having:

- a. a Last Application Status of “Approved”;
 - b. a Last Application Status Date of 9/17/13;
 - c. a first CME final Concern Date of 7/29/13 with Concern Type Non-NS;
- and
- d. a second CME final Concern Date of 6/16/15 with Concern Type KST.

My analyses use the Concern Type assigned to this application as of the time of adjudication (i.e., Non-NS as of 7/29/13).

(1) Adjudicated and Pending Application Statistics

17. The CARRP Dataset shows that 22,361 of 28,214 Forms I-485 and N-400 were: 1) received between October 1, 2012 and September 30, 2019; 2) purportedly subject to CARRP; and 3) Adjudicated by USCIS Decision as of September 30, 2019 (“Aggregate Adjudicated

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1 CARRP Applications”).¹⁰ The remaining 5,853 Forms I-485 and N-400 were either: 1) pending
2 (5,292 applications); 2) admin closed (390 applications); 3) withdrawn (33 applications); or 4)
3 otherwise excluded (138 applications).¹¹

4 18. I analyzed the Aggregate Adjudicated CARRP Applications based on USCIS’s
5 designation of Concern Type in the CARRP Dataset. Based on my analysis, I determined that
6 from October 1, 2012 through September 30, 2019, USCIS:

7 a. Adjudicated 18,732 applications, or 84%, identified as Non-NS. Of this
8 total, 16,123 applications, or 86%, were approved and 2,609, or 14%, were
9 denied.

10 b. Adjudicated 3,229 applications, or 14%, identified as Non-KST. Of this
11 total, 1,905 applications, or 59%, were approved and 1,324, or 41%, were denied

12 c. Adjudicated 218 applications, or 1%, identified as KST. Of this total, 25
13 applications, or 11%, were approved and 193, or 89% were denied.

14 19. In addition, of the 22,361 Aggregate Adjudicated CARRP Applications, I identified 182
15 applications, or 1%, that did not have a CME Concern Type prior to the adjudication of the
16 application. Of this total, 108, or 59%, were approved and 74, or 41%, were denied. See Exhibit
17 BM.

18 20. Of the 5,853 non-adjudicated applications, I determined that 5,292 applications were
19 pending as of September 30, 2019. Of these applications (See Exhibit BN):

20 a. 2,841, or 54%, were identified as Non-KST;

21 b. 2,179, or 41%, were identified as Non-NS;

22 c. 205, or 4%, were identified as KST; and
23

24 _____
25 ¹⁰ See my Supplemental Report, ¶ 25 for definition of “Adjudicated by USCIS Decision.”

26 ¹¹ See my Supplemental Report, Exhibit AB. Excluded Applications includes Adjudicated or Pending applications with a current status date prior to the receipt date, Adjudicated or Pending applications with a current status date equal to the receipt date, and Pending applications that had lawful permanent resident or United States citizen status for I-485 applications or United States citizen status for N-400 applications.

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1 d. 67, or 1%, did not have a Concern Type prior to September 30, 2019.

2 21. I performed similar analyses by Form Type. The results of these analyses are described
3 below.

4 **(a) Form I-485**

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6 22. The results for Forms I-485 are similar to the results for the Aggregate Adjudicated
7 CARRP Applications. The CARRP Dataset shows that 7,316, or 32.7%, of the 22,361
8 Adjudicated Aggregate CARRP Applications related to Forms I-485. I analyzed adjudicated
9 Forms I-485 based on USCIS's designation of Concern Type in the CARRP Dataset. Based on
10 my analysis, I determined that from October 1, 2012 through September 30, 2019 USCIS:

11 a. Adjudicated 6,059 Forms I-485, or 83%, identified as Non-NS. Of this
12 total, 5,207 applications, or 86%, were approved and 852, or 14%, were denied.

13 b. Adjudicated 1,087 Forms I-485, or 15%, identified as Non-KST. Of this
14 total, 583 applications, or 54%, were approved and 504, or 46%, were denied.

15 c. Adjudicated 102 Forms I-485, or 1%, identified as KST. Of this total, 11
16 applications, or 11%, were approved and 91, or 89%, were denied.

17 23. In addition, I identified 68 Forms I-485, or 1%, that did not have a CME Concern Type
18 prior to the adjudication of the application. Of this total, 43, or 63% were approved and 25, or
19 37%, were denied. See Exhibit BO.

20 24. I analyzed the pending Forms I-485 based on USCIS's designation of Concern Type in
21 the CARRP Dataset. Based on my analysis, I determined that of the total 5,292 pending
22 applications as of September 30, 2019, 1,944 pertained to Forms I-485 that were pending as of
23 September 30, 2019. Of these applications (See Exhibit BP):

24 a. 1,079, or 56%, were Non-KST;

25 b. 745, or 38%, were Non-NS;

26 c. 99, or 5%, were KST; and

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1 d. 21, or 1%, did not have a Concern Type prior to September 30, 2019.

2 **(b) Form N-400**

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4 25. The results for Form N-400 are similar to the results for the Adjudicated Aggregate
5 CARRP Applications. The CARRP Dataset shows that 15,045, or 67%, of the 22,361
6 Adjudicated Aggregate CARRP Applications related to Form N-400. I analyzed adjudicated
7 applications based on USCIS's designation of Concern Type in the CARRP Dataset. Based on
8 my analysis, I determined that from October 1, 2012 through September 30, 2019 USCIS:

9 a. Adjudicated 12,673 Forms N-400, or 84%, identified as Non-NS. Of this
10 total, 10,916 applications, or 86%, were approved and 1,757, or 14%, were
11 denied.

12 b. Adjudicated 2,142 Forms N-400, or 14%, identified as Non-KST. Of this
13 total, 1,322 applications, or 62%, were approved and 820, or 38%, were denied.

14 c. Adjudicated 116 Forms N-400, or 1%, identified as KST. Of this total, 14
15 applications, or 12%, were approved and 102, or 88%, were denied.

16 26. In addition, I identified 114 Forms N-400, or 1%, that did not have a CME Concern Type
17 prior to the adjudication of the application. Of this total, 65, or 57%, were approved and 49, or
18 43%, were denied. See Exhibit BQ.

19 27. I analyzed the pending Forms N-400 based on USCIS's designation of Concern Type in
20 the CARRP Dataset. Based on my analysis, I determined that of the total 5,292 applications
21 pending as of September 30, 2019, 3,348 pertained to Forms N-400. Of these applications (See
22 Exhibit BR):

23 a. 1,762, or 53%, were Non-KST;

24 b. 1,434, or 43%, were Non-NS;

25 c. 106, or 3%, were KST; and

26 d. 46, or 1%, did not have a Concern Type prior to September 30, 2019.

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(2) Mean and Median Processing Times

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28. In my Supplemental Report, I calculated the mean, or average, number of days an application remained pending from the application receipt date to the date of Adjudication by USCIS Decision for the Aggregate Adjudicated CARRP Applications. This mean is 617 days.¹² This indicates that an applicant: 1) who submitted a Form I-485 or N-400 on or after October 1, 2012; 2) was subject to CARRP; and 3) was adjudicated, awaited adjudication by USCIS Decision, on average, 617 days. This is approximately 1.7 years. I determined this figure by calculating the number of days between the application receipt date and last status date for each application processed under CARRP. For example, the Updated USCIS Detailed Data contains a record associated with “newid VBI9M3LOCM” having a receipt date of 5/13/14 for Form N-400 and adjudication by USCIS Decision date of 4/5/19. Thus, the applicant associated with “newid VBI9M3LOCM” spent 1,788 days awaiting adjudication by USCIS.

29. In addition, I calculated the median, or middle value, number of days pending as 574 days.¹³ This indicates that half of the applicants who submitted a Form I-485 or N-400 and were processed under CARRP spent 574 days or more awaiting adjudication by USCIS.

30. Using the CARRP Dataset, I performed similar analyses for each Concern Type identified by USCIS. For example, for approved applications identified as Non-NS, I calculated the mean, or average, number of days an application remained pending from the application receipt date to the date of adjudication by USCIS. This mean is 572 days.¹⁴ This indicates that an applicant: 1) who submitted a Form I-485 or N-400 between October 1, 2012 and September 2019; 2) was subject to CARRP; 3) was approved; and 4) identified by USCIS as Non-NS, awaited adjudication by USCIS Decision, on average, 572 days. This is approximately 1.6 years.

31. In addition, I calculated the median, or middle value, number of days pending as 546

¹² See my Supplemental Report, Exhibit AV.

¹³ See my Supplemental Report, Exhibit AV.

¹⁴ See Exhibit BM.

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1 days.¹⁵ This indicates that half of the applicants: 1) who submitted a Form I-485 or N-400
2 between October 1, 2012 and September 2019; 2) were processed under CARRP; 3) were
3 approved; and 4) identified by USCIS as Non-NS, spent 546 days or more awaiting adjudication
4 by USCIS.

5 32. I performed similar analyses for each Concern Type, whether approved, denied, or
6 pending, and by Form Type. The results of my analysis by Concern Type for Forms I-485 and
7 N-400 are listed below (See Exhibits BM, BO, and BQ):¹⁶

- 8 a. Non-NS – Approved = 572 average days pending (546 median days
9 pending).
- 10 b. Non-NS – Denied = 721 average days pending (644 median days
11 pending).
- 12 c. Non-NS – Pending = 750 average days pending (618 median days
13 pending).
- 14 d. Non-KST – Approved = 725 average days pending (691 median days
15 pending).
- 16 e. Non-KST – Denied = 777 average days pending (727 median days
17 pending).
- 18 f. Non-KST – Pending = 662 average days pending (572 median days
19 pending).
- 20 g. KST – Approved = 681 average days pending (563 median days pending).
- 21 h. KST – Denied = 857 average days pending (732 median days pending).
- 22 i. KST – Pending = 902 average days pending (899 median days pending).

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26 ¹⁵ See Exhibit BM.

¹⁶ These figures exclude applications that were received by USCIS prior to October 1, 2012 and remained pending as of September 30, 2019. The CARRP Dataset contains only applications received on or after October 1, 2012.

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b) My Analysis of USCIS’s Sub-status in the CARRP Dataset

33. The CARRP Dataset contains multiple fields related to Sub-status and the related applicable dates a given application was identified under one of the USCIS’s Sub-statuses (e.g., CME_1_Final_Substatus, CME_1_Final_Substatus_DT). These fields provide a basis to determine the Sub-status of any given application at various dates after USCIS received an application and when an application was adjudicated or pending. Based on my review and analysis of the CARRP Dataset, I identified two potential methods to perform my analyses of Sub-status: 1) analyze adjudicated and pending applications based on Sub-status at the time of adjudication or September 30, 2019 for pending applications; or 2) analyze adjudicated and pending applications based on the most recent Sub-status identified for each record in the CARRP Dataset, even if that Sub-status was created after adjudication or after September 30, 2019 for pending applications. For example, the CARRP Dataset contains a record associated with “newid Z0AL3PR9GQ” having:

- a. a Last Application Status of “Approved”;
- b. a Last Application Status Date of 9/17/13;
- c. a first CME final Sub-status date of 7/29/13 with a Sub-status of NS Concern Resolved; and
- d. a second CME final Sub-status date of 6/16/15 with a Sub-status of NS Concern Unresolved.

My analyses use the Sub-status assigned to this application as of the time of adjudication (i.e., NS Concern Resolved as of 7/29/13).

(1) Adjudicated and Pending Application Statistics

34. I analyzed the Aggregate Adjudicated CARRP Applications based on USCIS’s designation of Sub-status in the CARRP Dataset. Based on my analysis, I determined that from October 1, 2012 through September 30, 2019, USCIS:

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1 a. Adjudicated 17,666 applications, or 79%, identified as NS Concern
2 Resolved. Of this total, 15,183 applications, or 86%, were approved and 2,483, or
3 14%, were denied.

4 b. Adjudicated 2,283 applications, or 10%, identified as NS Not Confirmed.
5 Of this total, 1,663 applications, or 73%, were approved and 620, or 27%, were
6 denied.

7 c. Adjudicated 1,515 applications, or 7%, identified as NS Concern
8 Unresolved. Of this total, 915 applications, or 60%, were approved and 600, or
9 40%, were denied.

10 d. Adjudicated 819 applications, or 4%, identified as NS Confirmed. Of this
11 total, 357 applications, or 44%, were approved and 462, or 56%, were denied.

12 35. In addition, I identified 78 applications, or less than 1%, that either: 1) did not have a
13 CME Sub-status prior to the adjudication of the application; 2) had a null value for CME Sub-
14 status; or 3) had a Sub-status indicating the application was apparently returned to the “Field” or
15 pending assessment. Of this total, 43, or 55%, were approved and 35, or 45%, were denied. See
16 Exhibit BM.

17 36. I analyzed the pending applications based on USCIS’s designation of Sub-status in the
18 CARRP Dataset. Of the 5,292 pending applications (See Exhibit BN):

19 a. 2,136, or 40%, were NS Concern Resolved;

20 b. 2,197, or 42%, were NS Not Confirmed;

21 c. 712, or 13%, were NS Confirmed;

22 d. 226, or 4%, were NS Concern Unresolved; and

23 e. 21, or less than 1%, either: 1) did not have a CME Sub-status; 2) had a
24 null value for CME Sub-status; or 3) had a Sub-status indicating the application
25 was apparently returned to the “Field” or pending assessment as of September 30,
26 2019.

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1 37. I performed similar analyses by Form Type. The results of these analyses are described
2 below.

3 **(a) Form I-485**
4

5 38. The results for Form I-485 are similar to the results for the Aggregate Adjudicated
6 CARRP Applications. The CARRP Dataset shows that 7,316, or 33%, of the 22,361 Aggregate
7 Adjudicated CARRP Applications related to Forms I-485. I analyzed adjudicated applications
8 based on USCIS's designation of Sub-status in the CARRP Dataset. Based on my analysis, I
9 determined that from October 1, 2012 through September 30, 2019, USCIS:

10 a. Adjudicated 5,722 Forms I-485, or 78%, identified as NS Concern
11 Resolved. Of this total, 4,908 applications, or 86%, were approved and 814, or
12 14%, were denied.

13 b. Adjudicated 760 Forms I-485, or 10%, as identified NS Not Confirmed.
14 Of this total, 529 applications, or 70%, were approved and 231, or 30%, were
15 denied.

16 c. Adjudicated 438 Forms I-485, or 6%, identified as NS Concern
17 Unresolved. Of this total, 234 applications, or 53%, were approved and 204, or
18 47% were denied.

19 d. Adjudicated 353 Forms I-485, or 5%, identified as NS Confirmed. Of this
20 total, 147 applications, or 42%, were approved and 206, or 58%, were denied.

21 39. In addition, I identified 43 Forms I-485, or less than 1%, that either: 1) did not have a
22 CME Sub-status prior to the adjudication of the application; 2) had a null value for CME Sub-
23 status; or 3) had a Sub-status indicating the application was apparently returned to the "Field" or
24 pending assessment. Of this total, 26, or 60%, were approved and 17, or 40%, were denied. See
25 Exhibit BO.

26 40. I analyzed the pending Forms I-485 based on USCIS's designation of Sub-status in the

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1 CARRP Dataset. Based on my analysis, I determined that 1,944 Forms I-485 were pending as of
2 September 30, 2019. Of these applications (See Exhibit BP):

- 3 a. 725, or 37%, were NS Concern Resolved;
- 4 b. 816, or 42%, were NS Not Confirmed;
- 5 c. 286, or 15%, were NS Confirmed;
- 6 d. 110, or 6%, were NS Concern Unresolved; and
- 7 e. 7, or less than 1%, either: 1) did not have a CME Sub-status; 2) had a null
8 value for CME Sub-status; or 3) had a Sub-status indicating the application was
9 returned to the “Field” or pending assessment as of September 30, 2019.

10 **(b) Form N-400**

11
12 41. The results for Forms N-400 are similar to the results for the Aggregate Adjudicated
13 CARRP Applications. The CARRP Dataset shows that 15,045, or 67%, of the 22,361 Aggregate
14 Adjudicated CARRP Applications related to Forms N-400. I analyzed adjudicated applications
15 based on USCIS’s designation of Sub-status in the CARRP Dataset. Based on my analysis, I
16 determined that from October 1, 2012 through September 30, 2019, USCIS:

- 17 a. Adjudicated 11,944 Forms N-400, or 79%, identified as NS Concern
18 Resolved. Of this total, 10,275 applications, or 86%, were approved and 1,669, or
19 14%, were denied.
- 20 b. Adjudicated 1,523 Forms N-400, or 10%, identified as NS Not Confirmed.
21 Of this total, 1,134 applications, or 74%, were approved and 389, or 26%, were
22 denied.
- 23 c. Adjudicated 1,077 Forms N-400, or 7%, identified as NS Concern
24 Unresolved. Of this total, 681 applications, or 63%, were approved and 396, or
25 37% were denied.
- 26 d. Adjudicated 466 Forms N-400, or 3%, identified as NS Confirmed. Of

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1 this total, 210 applications, or 45%, were approved and 256, or 55% were denied.

2 42. In addition, I identified 35 Forms N-400, or less than 1%, that either: 1) did not have a
3 CME Sub-status prior to the adjudication of the application; 2) had a null value for CME Sub-
4 status; or 3) had a Sub-status indicating the application was apparently returned to the “Field” or
5 pending assessment. Of this total, 17, or 49%, were approved and 18, or 51%, were denied. See
6 Exhibit BQ.

7 43. I analyzed the pending Forms N-400 based on USCIS’s designation of Sub-status in the
8 CARRP Dataset. Based on my analysis, I determined that 3,348 Forms N-400 were pending as
9 of September 30, 2019. Of these applications (See Exhibit BR):

- 10 a. 1,411, or 42%, were NS Concern Resolved;
- 11 b. 1,381, or 41%, were NS Not Confirmed;
- 12 c. 426, or 13%, were NS Confirmed;
- 13 d. 116, or 3%, were NS Concern Unresolved; and
- 14 e. 14, or less than 1%, either: 1) did not have a CME Sub-status; 2) had a
15 null value for CME Sub-status; or 3) had a Sub-status indicating the application
16 was apparently returned to the “Field” or pending assessment as of September 30,
17 2019.

18 **(2) Mean and Median Processing Times**

19

20 44. I calculated the mean and median days an application was pending for each Sub-status
21 identified by USCIS. For example, for approved applications identified as NS Concern
22 Resolved, I calculated the mean, or average, number of days an application remained pending
23 from the application receipt date to the date of adjudication by USCIS. This mean is 582 days.¹⁷
24 This indicates that an applicant: 1) who submitted a Form I-485 or N-400 between October 1,
25 2012 and September 2019; 2) was subject to CARRP; 3) was approved; and 4) identified by

26 _____
¹⁷ See Exhibit BM.

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1 USCIS as NS Concern Resolved awaited adjudication by USCIS Decision, on average, 582 days.
2 This is approximately 1.6 years.

3 45. In addition, I calculated the median, or middle value, number of days pending as 556
4 days.¹⁸ This indicates that half of the applicants: 1) who submitted a Form I-485 or N-400
5 between October 1, 2012 and September; 2) were processed under CARRP; 3) were approved;
6 and 4) identified by USCIS as NS Concern Resolved spent 557 days or more awaiting
7 adjudication by USCIS.

8 46. I performed similar analyses for each Sub-status, whether approved, denied, or pending
9 and by Form Type. The results of my analysis by Sub-status for Forms I-485 and N-400 are
10 listed below (See Exhibits BM, BO, and BQ):

11 a. NS Concern Resolved – Approved = 582 average days pending (556
12 median days pending).

13 b. NS Concern Resolved – Denied = 722 average days pending (653 median
14 days pending).

15 c. NS Concern Unresolved – Approved = 815 average days pending (784
16 median days pending).

17 d. NS Concern Unresolved – Denied = 833 average days pending (771
18 median days pending).

19 e. NS Confirmed – Approved = 700 average days pending (596 median days
20 pending).

21 f. NS Confirmed – Denied = 824 average days pending (754 median days
22 pending).

23 g. NS Not Confirmed – Approved = 504 average days pending (430 median
24 days pending).

25 h. NS Not Confirmed – Denied = 699 average days pending (621 median
26

¹⁸ See Exhibit BM.

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1 days pending).

2 i. NS Concern Resolved – Pending = 739 average days pending (615 median
3 days pending).

4 j. NS Concern Unresolved – Pending = 724 average days pending (473
5 median days pending).

6 k. NS Confirmed – Pending = 848 average days pending (767 median days
7 pending).

8 l. NS Not Confirmed – Pending = 631 average days pending (539 median
9 days pending).

10 **c) My Analysis of USCIS’s Concern Type and Sub-status**
11 **Combinations in the CARRP Dataset**

12 47. Using the CARRP Dataset, I was able to analyze various combinations of Concern Type
13 and Sub-status (e.g., how many applications contained Concern Type of Non-NS and Sub-status
14 of NS Concern Resolved at the time of adjudication or as of September 30, 2019 for pending
15 applications). For example, based on my analysis, I identified 19,417 applications that had a
16 Concern Type of Non-NS and Sub-status of NS Concern Resolved at the time of adjudication or
17 as of September 30, 2019 for pending applications.¹⁹ This is 70% of 27,653 applications that
18 were received between October 1, 2012 and September 30, 2019 and approved, denied, or
19 pending as of September 30, 2019. See Exhibits BS, BT, and BU.
20

21 **3. My Identification of Potential Data Anomalies in the CARRP Dataset**

22 48. Based on my review and analysis of the CARRP Dataset, I identified 43 applications that
23 have a Concern Type of Non-NS that corresponds to the applicant’s CME open date. This
24
25
26

¹⁹ See Exhibit BS.

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1 appears to indicate that these 43 applications started the CARRP review process as Non-NS.²⁰ It
2 is unclear why certain applications appear to have started the CARRP review process as Non-
3 NS, as the FDNS-DS User Guide states that “[t]he Concern cannot start out as ‘Non-NS,’ so this
4 value is not available until after the first Save.”²¹ See Exhibit BV for a listing of newids
5 associated with these 43 applications.

6 49. Based on the information I have received to date, it is unclear how the NS Concern
7 designation for an adjudicated application relates to the designation of CARRP vs. Not-CARRP.
8 For example, I identified 98 adjudicated applications where the final Concern Type is Non-NS,
9 the final Sub-status is NS Concern Resolved, and the CARRP Dataset has no indication that
10 these correspond to a CME open date (i.e., the date the USCIS’s algorithm identified
11 applications as being subject to CARRP). It is unclear why an adjudicated application was
12 identified as CARRP if throughout the CARRP review process the application was: 1) identified
13 as a Non-NS Concern Type; and 2) identified as a NS Concern Resolved Sub-status without any
14 changes to the Concern Type or Sub-status between application receipt and adjudication. See
15 Exhibit BW for a listing of newids associated with these 98 applications.

16 50. Based on my review and analysis of the CARRP Dataset, I identified 41 applications that
17 either: 1) did not have a Concern Type or Sub-status at the time of adjudication or as of
18 September 30, 2019 for pending applications; or 2) did not have a Concern Type and had a null
19 value for Sub-status at the time of adjudication or as of September 30, 2019 for pending
20 applications. As a result, it is unclear why these application were subject to CARRP. See
21 Exhibit BX for a listing of newids associated with these 41 applications.

22 51. Based on my review and analysis of the CARRP Dataset, I identified applications that
23 have multiple Concern Type and/or Sub-status changes throughout the CARRP review process
24

²⁰ See CARRP Dataset, columns AB (cme_created_date1), CL (CME_1_NS_Con_Type_Old_1), CM (CME_1_NS_Con_Type_New_1), and CN (CME_1_NS_Con_Type_Change_Date_1) where column CL is blank, column CM = “Non-NS”, and the date in column AB = the date in column CN. My understanding is that according to USCIS’s algorithm, if a CME was open at any time between the application Receipt Date and Last Application Status Date, that application would be identified as CARRP. See my Second Supplemental Report, ¶¶10 and FN 10.

²¹ FDNS-DS User Guide (DEF-00428622), p. 454.

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1 and, at times, on the same day. See Exhibits BY, BZ, and CA. For example, the CARRP Dataset
2 contains a record associated with “newid 76MR7I7W7F” having:

- 3 a. a Receipt Date of 4/22/14;
- 4 b. a Last Application Status of “Approved”;
- 5 c. a Last Application Status Date of 4/9/15;
- 6 d. a Concern Type change on 8/4/14 from a null value to Non-NS;
- 7 e. a subsequent Concern Type change on 9/8/14 from Non-NS to Non-KST;
- 8 f. a subsequent Concern Type change on 9/8/14 from Non-KST to Non-NS;
- 9 g. a subsequent Concern Type change on 9/8/14 from Non-NS to Non-KST;
- 10 h. a final Concern Type change on 4/9/15 from Non-KST to Non-NS.²²

11 52. Based on the information I have received to date, it is unclear why USCIS would change
12 the Concern Type of an application with multiple subsequent changes between the same two
13 Concern Types. See Exhibit CB for additional examples of applications with multiple Concern
14 Type and/or Sub-status changes throughout the CARRP review process.

15 53. It is my understanding that USCIS has not provided all underlying copies of completed
16 applications. Accordingly, I have been unable to perform validation procedures, such as
17 completeness or accuracy checks, on the CARRP Dataset.

18 54. I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th
19 day of March 2021 in Chicago, IL.

20
21 

22 _____
SEAN M. KRUSKOL

23
24
25
26 ²² See the CARRP Dataset at “newid 76MR7I7W7F,” columns CME_1_NS_Con_Type_Old_1,
CME_1_NS_Con_Type_New_1, CME_1_NS_Con_Type_Change_Date_1 through CME_1_NS_Con_Type_Old_5,
CME_1_NS_Con_Type_New_5, and CME_1_NS_Con_Type_Change_Date_5.

EXHIBIT BJ**Sean M. Kruskol, CPA/CGMA, CFE
Principal**

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 181 West Madison Street, 43rd Floor • Chicago, IL 60602-4558
 312.345.7613 • fax 312.345.7399
skruskol@cornerstone.com

SUMMARY

Mr. Kruskol has addressed forensic accounting, valuation, causation, and economic damages issues in a wide variety of commercial disputes, generally involving large-scale data analytics. He is a Certified Public Accountant (CPA), Chartered Global Management Accountant (CGMA), and a Certified Fraud Examiner (CFE). In dispute-related matters, Mr. Kruskol's clients have included both public and private companies in healthcare, professional services, manufacturing, pharmaceutical, banking, real estate, insurance, entertainment, and technology industries. In investigation-related matters, he has examined financial reporting fraud, Ponzi schemes, asset misappropriation, and other forms of corporate misconduct. He has performed his work in nine different countries across three different continents.

ACADEMIC BACKGROUND

2006–2007	Miami University (Ohio) <i>M.Acc., Accounting</i>	Oxford, Ohio
2003–2007	Miami University (Ohio) <i>B.S., Accounting</i>	Oxford, Ohio

PROFESSIONAL EXPERIENCE

2013–Present	Cornerstone Research, Inc. <i>Principal</i>	Chicago, Illinois
2011–2013	Navigant Consulting, Inc. <i>Managing Consultant</i>	Chicago, Illinois
2010–2011	Ryan Specialty Group <i>Director of Finance - Wholesale</i>	Chicago, Illinois
2007–2010	KPMG <i>Senior Associate</i>	Chicago, Illinois

**Sean M. Kruskol, CPA/CGMA, CFE
Principal**

REPRESENTATIVE CONSULTING MATTERS

Data Analytics

Designed and implemented a recursive cash tracing analysis for one of the largest diversified financial services companies in the United States related to an alleged EB-5 fraud.

Designed and implemented a series of scenario-based exposure analyses in a large *qui tam* matter involving a leading U.S. telecom company. These exposure analyses analyzed tens of millions of records and summarized results for counsel's settlement negotiations.

Designed and implemented an exposure analysis for a large retailer accused of predatory sales practices by the FTC. This exposure analyses analyzed millions of records and summarized results for counsel's settlement negotiations.

Used SQL and SAS to analyze millions of Medicare, Medicaid, and other insurance related claims for various healthcare services including prescription drugs, surgical procedures, and other medical procedures on various cases.

Used SQL to analyze a hundred million+ transactional records for a large global automotive manufacturer to study the timing of vehicle sales.

Used SQL to analyze billions of transactional records for a large on-line retailer to study customer behavior.

Used SQL to analyze a billion+ records related to components of computer hardware for a computer manufacturer to study component costs.

Used SQL to analyze millions of transactional records for a large global manufacturer to study the timing of payments to vendors.

Used SQL to analyze millions of journal entries to find patterns of non-standard journal entries.

Consistently used Computer Assisted Audit Techniques (CAATs) to address fraud risks for clients. Specifically, used ACL and IDEA stored procedures to run analyses regarding Benford's Law, Phantom Employees and Vendors, Accounts Receivable / Payable Aging, and General Ledger entries.

Assisted a large titanium and steel-alloy forging company in assessing potential liability allegations that the company failed to pay proper wages. Used the company's payroll and timekeeping data sets to quantify potential liability based on applicable state laws.

Assisted in the review of *qui tam* allegations involving the False Claims Act regarding Medicaid claims paid by the Federal Government. Responsibilities included database creation and analysis of Medicaid claims as well as analyzing the plaintiff's sampling methodology. Further responsibilities included drafting text and exhibits for the expert report.

As part of a Fraud in the Audit (FITA) rotation, used Computer Assisted Audit Techniques (CAATs) software to import, validate, analyze, and report on the fraud risk associated with millions of journal entries.

Accounting, Auditing, and Post-Acquisition Disputes

Analyzed and critiqued claimant's \$400 million damages claim in an accounting malpractice dispute. Analyzed the timing and causes of plaintiff's deteriorating financial condition and bankruptcy.

Provided financial and accounting consulting services in connection with a post-acquisition dispute involving the purchase of a pet food manufacturer. Work included analyzing buyer and seller businesses,

Sean M. Kruskol, CPA/CGMA, CFE
Principal

analyzing financial statements and purchase agreements, preparing complex financial models, calculating damages under various purchase price adjustment scenarios, and analyzing due diligence findings.

Provided accounting consulting services in connection with a post-acquisition dispute involving the purchase of a regional grocer. Work included analyzing buyer and seller businesses, analyzing relevant U.S. GAAP, analyzing financial statements and purchase agreements, preparing complex financial models.

Provided accounting consulting services in connection with a post-acquisition dispute involving the sale of a logistics business in the heavy equipment industry. Work included analyzing buyer and seller businesses, analyzing relevant U.S. GAAP, analyzing financial statements and purchase agreements, and drafting position papers.

Provided accounting consulting services in connection with a post-acquisition dispute involving the purchase of a giftware company. Work included analyzing buyer and seller businesses, analyzing relevant U.S. GAAP, analyzing financial statements and purchase agreements, preparing complex inventory analyses.

Analyzed an earn-out agreement between a large network provider and previous owners of an application performance company. Issues included contractual and industry definitions compared to U.S. GAAP definition (e.g., “bookings” vs. revenue) and analysis of various profit and loss statements (i.e., controllable vs. fully-loaded).

Analyzed deepening insolvency damages claims that resulted from the bankruptcy of healthcare insurer

Analyzed and reviewed accounting records and data in a post-acquisition dispute between a private equity firm and a data center construction company

Obtained, reviewed, and analyzed various accounting and business records related to the merger between two of the four largest U.S. telecom companies.

Evaluated financial statements and disclosures for compliance with accounting frameworks (U.S. GAAP and IFRS), GAAS literature (U.S. GAAS and ISA), and SEC filing requirements in various matters across multiple industries.

Assisted counsel with evaluating the SEC’s claims that two auditors were professionally negligent when overseeing the audit of a Brazilian subsidiary of a large manufacturer.

Assisted counsel with the defense of a former independent auditor against claims brought by third party lending institutions.

Provided audit services to clients in the Consumer Products and Financial Services industries. Work included the auditing of revenue transactions under SAB 104 and related revenue recognition accounting literature.

Breach of Contract Disputes

Analyzed damages and loss causation related to a breach of contract for a healthcare revenue cycle company. Analyzed payroll expenses, third-party invoices, and incentive/penalty calculations and related payments to develop a damages model.

Analyzed revenue and expenses for a health insurance claims processing, billing, and customer service company. Analyzed profitability of company over a multi-year period to develop a damages model.

Assisted counsel with calculating lost profit damages and responding to a breach of contract and fraudulent inducement claim over the sale and leaseback of a manufacturing facility.

**Sean M. Kruskol, CPA/CGMA, CFE
Principal**

Assisted counsel with calculating various damages scenarios related to an alleged breach of contract of a consulting contracting for a leading enterprise technology provider of software, hardware, and services

Assisted counsel with analyzing damages related to an alleged breach of contract on the sale of services for tens of thousands of hardware devices for a technology company.

Provided financial and accounting consulting services in a dispute involving a lost-profits claim due to breach of contract in an entertainment-industry lawsuit.

Analyzed the costs incurred by a client on a failed software implementation project. Analyzed thousands of general ledger transactions over a 6-year+ period.

Calculated pre- and post-judgment interest on damages awarded in breach of contract matter.

Forensic Investigations

Assisted a Special Committee of the Board of Directors for a global automotive manufacturing company by analyzing the timing of revenue recognition associated with six years of vehicle sales.

Analyzed the quarterly accounts payable balance for a global manufacturing company to assist counsel in responding to issues raised by the SEC.

In a post-acquisition dispute, assisted counsel in investigating and reporting on a potential seven-year earnings management scheme.

Analyzed customer bank account activity to identify patterns evidencing transactions consistent with the customer's Ponzi scheme.

Analyzed corporate bank account activity for a loan originator and servicer to identify patterns in cash transfers between operating and fiduciary accounts.

Assisted the Chief Accounting Officer and Internal Audit for the Australian subsidiary of a billion-dollar logistics company with an earnings management investigation and financial statement reconstruction, addressing allegations of improper accounting procedures. Assisted in the development of comprehensive analyses related to the impact of accounting errors on the company's statutory financial statements.

Assisted counsel in investigating a whistleblower complaint related to allegations of improper conduct related to promotional allowance activity in the retail industry.

Assisted the audit committee in investigating claims of improper revenue recognition practices on a long-term government contract.

Assisted the EMEA Controller of a former Fortune 300 brokerage company in the performance of accelerated audits for multiple subsidiaries in four different countries over a period of two and a half months.

Assisted counsel of a global financial services company by analyzing electronic evidence to support a multi-faceted investigation regarding alleged theft of trade secrets. Conducted an analysis of the targets' web-based email, instant messaging, internet browsing history, phone logs, and other electronic evidence.

Other Consulting and Industry Experience

Assisted a Monitoring Trustee tasked with investigating and reporting a global company's compliance with a USDOJ Consent Decree.

**Sean M. Kruskol, CPA/CGMA, CFE
Principal**

Assisted counsel of a private equity fund with creating a net equity analysis under Section 8 of the Clayton Act

Assisted the Interim CFO of the Australian subsidiary of a billion-dollar logistics company by providing advice on technical accounting matters, coordinating year-end audit preparation with the external auditors, delegating tasks to support staff, and participating in monthly management meetings.

Led financial due diligence on potential acquisition targets in the wholesale insurance industry, modeled results of financial due diligence, and presented findings to the CEO, CFO, and Business-Unit Presidents.

Prepared various analyses of earn-out agreements between a wholesale insurance company and its acquisitions.

Performed recalculation of interest on short-term and long-term debt for various audit clients.

Created and used various financial planning and analysis tools and templates for a business segment of a start-up company.

Performed security administrator duties for a start-up company's ERP, Microsoft Great Plains, and expense reimbursement tool, Concur Expense.

Served as a member of the implementation team for Microsoft Great Plains and Concur Expense for a start-up company.

Sean M. Kruskol, CPA/CGMA, CFE
Principal

CERTIFICATIONS

Certified Public Accountant (CPA). Illinois license number: 065-035214

Chartered Global Management Accountant (CGMA)

Certified Fraud Examiner (CFE)

SPEAKING ENGAGEMENTS

Illinois CPA Society – 2020 Annual Summit August 2020
Simple Questions and Complex Fraud: A Primer

Chicago Bar Association – Startup Bootcamp April 2017
Panelist

Miami University Farmer School of Business, Masters of Accountancy Program. October 2009
Invited Guest Speaker. Topic related to integrity, leadership, and transparency.
First M.Acc. alumnus to be invited back to formally speak to graduate students

TEACHING/INSTRUCTION

Justice Entrepreneurs Project January 2021
Guest presenter on Introduction to Financial Documents for solo and small law firms

Olin Business School at Washington University in St. Louis, Undergraduate Finance 2015–Present
Recurring guest lecturer on modeling damage scenarios

Justice Entrepreneurs Project 2013–2016
Guest presenter on budgeting for solo and small law firms

Excel and Access Training for new consultants at Navigant 2012–2013
Taught intermediate Excel/Access functionality and overall data management

Computer Assisted Audit Techniques (CAATs) Seminar at KPMG 2008–2009
Instructed on data import, analysis, and interpretation

Ernst & Young Business Excellence Summit at Miami University September 2008
Small group leader and discussion facilitator

PUBLICATION

“Efficiencies Defense Newly Viable After T-Mobile/Sprint Ruling” with Russell Molter, Breno De Castro Vieira, and Michael Hilfiker *Law360*, March 13, 2020; *The National Law Review*, July 2, 2020 Volume X, Number 184

PROFESSIONAL MEMBERSHIPS

Member, American Institute of Certified Public Accountants

Member, Illinois CPA Society

Member, Association of Certified Fraud Examiners

Associate Member, American Bar Association

Sean M. Kruskol, CPA/CGMA, CFE
Principal

PROGRAMMING LANGUAGES USED IN LITIGATION MATTERS

SQL, SAS, R, and VBA

OTHER PROGRAMMING LANGUAGES

Java and COBOL

OTHER ACTIVITIES

Illinois CPA Society, Audit & Assurance Services Committee, Member	2017–Present
Illinois Legal Aid Online Board Member, Exec. Committee Member	2017–Present
Illinois Legal Aid Online Board Member, Secretary	2019–Present
Illinois Legal Aid Online Board Member, Treasurer	2017–2019
Illinois Legal Aid Online Board Member, Finance Committee Member	2016–Present
Justice Entrepreneurs Project – Chicago, Advisory Board Member	2016–Present
Justice Entrepreneurs Project – Chicago, Training and Mentoring Committee	2020–Present
JEP Legal Consumer Complaints Resolution Committee	2020–Present
Illinois Legal Aid Online YPB, Executive Committee Member	2013–2016

AWARDS, RECOGNITION, AND QUOTES

Illinois CPA Society, <i>Insight Magazine</i> , Fraud Is the New Normal	Fall 2020
Illinois CPA Society Distinguished Service Award	2018–2019
Illinois CPA Society, <i>Insight Magazine</i> , IN Play: Q&A	Winter 2019

EXHIBIT BK

Expert Reports and Testimony of Sean M. Kruskol

United States District Court, Western District of Washington at Seattle

Wagafe, et al. v. Trump, et al.

Data analytics and compilation of summary statistics.

Expert Reports: February 2020, July 2020, September 2020. Deposition Testimony October 2020.

United States District Court, Eastern District of Pennsylvania

Tower Health, f/k/a Reading Health System, et al. v. CHS/Community Health Systems, Inc.; Pennsylvania Hospital Company, LLC; and Pottstown Hospital Company, LLC

Analysis of GAAP, causation, and economic damages.

Expert Report January 2021. Deposition Testimony January 2021.

Exhibit BL

Documents Considered

Additional documents considered since my September 21, 2020 report are in **bold**.

Legal Pleadings

Complaint, *Abdiqafar Wagafe, et al., v. United States Citizenship Immigration Services, et al.*, 1/23/17
Amended Complaint, *Abdiqafar Wagafe, et al., v. Donald Trump, et al.*, 2/1/17
Plaintiffs' First Requests for Production to Defendants, 8/1/17
Order Granting Class Certification, 6/21/17
Declaration of James W. McCament in Support of Defendants' Response to Plaintiffs' Motion to Compel, 10/10/17
Defendants' Objections and Responses to Plaintiffs' Fifth Request for Production of Documents and Third Interrogatory, 10/16/18
Defendants' Motion for Limited Protective Order, 3/1/18
Order Granting in Part and Denying in Part Plaintiffs' Motion to Compel Production of Documents, 10/19/17
Order Granting in Part and Denying in Part Plaintiffs' Motion to Compel and Defendants' Cross-Motion for a Protective Order, 7/9/19
Plaintiffs' Motion to Compel Statistical Data Under Fed R. Civ. P. 37(a)(3), 10/15/20
Order Granting Plaintiffs' Motion to Compel Statistical Data Under Fed R. Civ. P. 37(a)(3), 12/1/20

Depositions

Deposition Testimony and Exhibits 54–67 of Daniel Renaud, 1/10/20
Deposition Testimony and Exhibits A–I of USCIS's Witness Kevin M. Shinaberry, 8/31/20

Expert Reports

Expert Report and Exhibits of Bernard R. Siskin, 2/28/20
Amended Report and Exhibits of Bernard R. Siskin, 7/17/20
Responsive Report of Bernard R. Siskin, 10/13/20

Produced Data

Class List as of 4/12/18 (Class List (as of Apr. 12 2018) with Race Religion (002) ATTORNEYS EYES ONLY (Defendant's counsel sent via email on 10-24-2018).xlsx)
Class List as of 6/30/18 (Class List (as of June 30, 2018) (Confidential Attorney Eyes Only) (password protected).xlsx)
Class List as of 9/30/18 (Class List (as of September 30, 2018) (FOUO - Do Not Distribute Outside USG).xlsx)
Class List as of 12/31/18 (Class List (as of December 31, 2018) (Confidential - Attorney Eyes Only).xlsb)
Class List as of 3/31/19 (Class List (as of March 31, 2019) (Confidential - Attorney Eyes Only).xlsb)
Class List as of 6/30/19 (Class List (as of June 30 2019) (Confidential - Attorney Eyes Only).xlsx)
Class List as of 9/30/19 (Class List (as of Sept. 30, 2019) (Confidential - Attorney Eyes Only).xlsx)
2019-07-26 - Wagafe - USCIS_data_FY2013_to_FY2019.xlsx
2019-11 Wagafe_Internal_Data_FY2013_FY2019 (Confidential Pursuant to Protective Order) Feb6 updates.xlsx
2018-10-16 Defendants' Spreadsheet re Response to Plaintiffs' 3rd Interrogatory No. 3.XLSX
Records #48 FOIA Response.pdf
DEF-00072676 - CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER.xlsx
DEF-00131632.pdf
DEF-00156511 - CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER.xlsx
DEF-00038830.xlsx
DEF-00044519.pdf
2020-06_Wagafe_Internal_Data_FY2013-2019_(Confidential_Pursuant_to_Protective_Order).xlsx
USCIS_Data_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Exhibit BL

Documents Considered

Additional documents considered since my September 21, 2020 report are in **bold**.

data_dictionary – Subject to Attorneys' Eyes Only Protective Order.xlsb

DEF13_0000999 Redacted.xlsb

USCIS_Data_Jan2020 - Confidential – Subject to Attorneys' Eyes Only Protective Order.xlsb

jan_2021_data_dictionary – Subject to Attorneys' Eyes Only Protective Order.xlsb

Public Materials

Form N-400 and Instructions, available at <https://www.uscis.gov/n-400>

Form I-485 and Instructions, available at <https://www.uscis.gov/i-485>

USCIS Affirmative Asylum Application Statistics and Decisions Annual Report, 6/20/16, available at <https://www.dhs.gov/sites/default/files/publications/U.S.%20Citizenship%20and%20Immigration%20Services%20-%20Affirmative%20Asylum%20Application%20Statistics%20and%20Decisions%20Annual%20Report%20-%20FY%202016.pdf>

Department of Homeland Security Yearbook of Immigration Statistics, FY 2017–FY 2018, available at <https://www.dhs.gov/immigration-statistics/yearbook>

DHS/USCIS Privacy Impact Assessment for the Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR), 7/26/18, available at <https://www.dhs.gov/sites/default/files/publications/privacy-pia-uscis-023b-eciscor-july2018.pdf>

USCIS Historical Processing Times, available at <https://egov.uscis.gov/processing-times/historic-pt>

"Data preprocessing in detail," IBM Developer, 6/14/19, available at <https://developer.ibm.com/technologies/analytics/articles/data-preprocessing-in-detail>

Memorandum from Jonathan Scharfen, Deputy Director of USCIS to Field Leadership, "Policy for Vetting and Adjudicating Cases with National Security Concerns," 4/11/08, available at https://www.uscis.gov/sites/default/files/USCIS/About%20Us/Electronic%20Reading%20Room/Policies_and_Manuals/CARRP_Guidance.pdf

United States Code, Title 8–Aliens and Nationality, § 1571–1572, effective 10/17/00

Code of Federal Regulations, Title 8, Chapter I, Subchapter C, §335.6 Failure to appear for examination, amended 8/29/11

Code of Federal Regulations, Title 8, Chapter I, Subchapter C, §335.10 Withdrawal of application, amended 8/29/11

Code of Federal Regulations, Title 8, Chapter I, Subchapter C, §337.10 Failure to appear for oath administration ceremony, 9/24/93

Adjudicator's Field Manual - Redacted Public Version, Chapter 10.3 General Adjudication Procedures

Adjudicator's Field Manual - Redacted Public Version, Chapter 10.5 Requesting Additional Information

Adjudicator's Field Manual - Redacted Public Version, Chapter 15.1 Interview Policies

Adjudicator's Field Manual - Redacted Public Version, Chapter 20.4 Petition Withdrawal

USCIS Policy Manual, Volume 12, Part B, Chapter 4 Results of the Naturalization Examination, current as of 2/24/20

USCIS Policy Manual, Volume 7, Part A, Chapter 11 Decision Procedures, current as of 2/26/20

Privacy Impact Assessment Update for the Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, 3/25/16, available at <https://www.dhs.gov/sites/default/files/publications/privacy-pia-uscis-claims3appendixupdated-september2019.pdf>

Privacy Impact Assessment Update for the Computer Linked Application Information Management System 4 (CLAIMS 4), 11/5/13, available at <https://www.dhs.gov/sites/default/files/publications/privacy-pia-update-uscis-claims4-november2013.pdf>

Exhibit BL

Documents Considered

Additional documents considered since my September 21, 2020 report are in **bold**.

Privacy Impact Assessment for the USCIS Electronic Immigration System (USCIS ELIS), 5/17/16, available at <https://www.dhs.gov/sites/default/files/publications/privacy-pia-uscis-elisappendixaupdate-may2018.pdf>

A Guide to Naturalization, revised 11/16, available at <https://www.uscis.gov/sites/default/files/files/article/M-476.pdf>

Annual Report on the Impact of the Homeland Security Act on Immigration Functions Transferred to the Department of Homeland Security, 4/13/18, available at <https://www.uscis.gov/sites/default/files/reports-studies/Annual-Report-on-the-Impact-of-the-Homeland-Security-Act-on-Immigration-Functions-Transferred-to-the-DHS.pdf>

Trends in Naturalization Rates: FY 2014 Update, 11/16, available at <https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports/Trends-in-Naturalization-Rates-FY14-Update.pdf>

USCIS Form I-485 Performance Data, FY 2016–FY 2019

USCIS Form N-400 Performance Data, FY 2016–FY 2019

The World Factbook, Central Intelligence Agency, available at <https://www.cia.gov/library/publications/the-world-factbook/>

Statement on Standards for Forensic Services, No. 1, effective for engagements accepted on or after 1/1/20, available at <https://www.aicpa.org/content/dam/aicpa/interestareas/forensicandvaluation/resources/standards/downloadable/documents/ssfs-no-1.pdf>

Lawful Permanent Residents (LPR), U.S. Department of Homeland Security, updated 2/24/20, available at <https://www.dhs.gov/immigration-statistics/lawful-permanent-residents#:~:text=>

Citizenship Through Naturalization, U.S. Citizenship and Immigration Services, updated 4/17/19, available at <https://www.uscis.gov/us-citizenship/citizenship-through-naturalization#:~:text=>

USCIS Policy Manual, Volume 12, Part A, Chapter 2 Becoming a U.S. Citizen, current as of 2/26/20

USCIS Policy Manual, Volume 7, Part A, Chapter 4 Documentation, current as of 2/26/20

USCIS Policy Manual, Volume 7, Part A, Chapter 5 Interview Guidelines, current as of 2/26/20

USCIS Policy Manual, Volume 7, Part A, Chapter 6 Adjudicative Review, current as of 2/26/20

USCIS Policy Manual, Volume 7, Part A, Chapter 10 Legal Analysis and Use of Discretion, current as of 2/26/20

USCIS Policy Manual, Volume 12, Part B, Chapter 2 Background and Security Checks, current as of 2/26/20

USCIS Policy Manual, Volume 12, Part B, Chapter 3 Naturalization Interview, current as of 2/26/20

USCIS Glossary, for entries "Reject (as compared to denial)" and "Fiscal year," available at <https://www.uscis.gov/tools/glossary>

Pew-Templeton Global Religious Futures Project–Palestinian territories, Pew Research Center, available at http://www.globalreligiousfutures.org/countries/palestinian-territories#/?affiliations_religion_id=0&affiliations_year=2010®ion_name=All%20Countries&restrictions_year=2016

Arabia, Encyclopædia Britannica, Britannica Group, Inc., updated 11/20/19, available at <https://www.britannica.com/place/Arabia-peninsula-Asia>

Yugoslavia, Encyclopædia Britannica, Britannica Group, Inc., updated 2/22/19, available at <https://www.britannica.com/place/Yugoslavia-former-federated-nation-1929-2003>

Note: Even if not included in this list, I also considered and relied upon any other documents cited in my declaration or exhibits.

Approval and Denial Rates

Forms I-485 and N-400 Subject to CARRP

By Final Concern Type and Final Sub-status, using Most Recent CME prior to Last Status Date

		Fiscal Year of Last Status ^[1]								Mean	Median
		2013	2014	2015	2016	2017	2018	2019	All Years	Days Pending	Days Pending
Concern Type											
Non-NS	Approved	412	1,788	2,074	2,229	2,649	3,246	3,725	16,123	572	546
	Denied	36	179	308	336	377	573	800	2,609	721	644
	Subtotal, Non-NS	448	1,967	2,382	2,565	3,026	3,819	4,525	18,732		
	<i>% Approved</i>	92%	91%	87%	87%	88%	85%	82%	86%		
Non-KST	Approved	39	231	205	145	276	367	642	1,905	725	691
	Denied	17	101	107	134	203	260	502	1,324	777	727
	Subtotal, Non-KST	56	332	312	279	479	627	1,144	3,229		
	<i>% Approved</i>	70%	70%	66%	52%	58%	59%	56%	59%		
KST	Approved	0	4	6	4	4	5	2	25	681	563
	Denied	2	17	20	26	17	38	73	193	857	732
	Subtotal, KST	2	21	26	30	21	43	75	218		
	<i>% Approved</i>	0%	19%	23%	13%	19%	12%	3%	11%		
Subtotal	Approved	451	2,023	2,285	2,378	2,929	3,618	4,369	18,053	589	558
	Denied	55	297	435	496	597	871	1,375	4,126	745	671
	Subtotal	506	2,320	2,720	2,874	3,526	4,489	5,744	22,179		
	<i>% Approved</i>	89%	87%	84%	83%	83%	81%	76%	81%		
No CME prior to Last Status^[2]	Approved	14	30	15	15	8	14	12	108	483	344
	Denied	8	13	12	7	13	7	14	74	597	464
	Subtotal	22	43	27	22	21	21	26	182		
	<i>% Approved</i>	64%	70%	56%	68%	38%	67%	46%	59%		
Total	Approved	465	2,053	2,300	2,393	2,937	3,632	4,381	18,161	588	557
	Denied	63	310	447	503	610	878	1,389	4,200	743	669
	Subtotal	528	2,363	2,747	2,896	3,547	4,510	5,770	22,361		
	<i>% Approved</i>	88%	87%	84%	83%	83%	81%	76%	81%		
	Admin Closed	3	20	29	49	63	74	152	390	823	711
	Withdrawn	0	0	0	0	1	7	25	33	540	484
	Pending	0	0	0	0	0	0	5,292	5,292	707	598
	Excluded Applications ^[3]	0	0	0	0	0	0	138	138	1,068	817
	Total CARRP Applications	531	2,383	2,776	2,945	3,611	4,591	11,377	28,214		

Approval and Denial Rates

Forms I-485 and N-400 Subject to CARRP

By Final Concern Type and Final Sub-status, using Most Recent CME prior to Last Status Date

		Fiscal Year of Last Status ^[1]							All Years	Mean Days Pending	Median Days Pending
		2013	2014	2015	2016	2017	2018	2019			
Sub-status											
NS Concern Resolved	Approved	386	1,503	1,758	1,935	2,590	3,278	3,733	15,183	582	556
	Denied	34	159	267	297	369	562	795	2,483	722	653
	Subtotal, NS Concern Resolved	420	1,662	2,025	2,232	2,959	3,840	4,528	17,666		
	% Approved	92%	90%	87%	87%	88%	85%	82%	86%		
NS Concern Unresolved	Approved	18	42	51	64	112	217	411	915	815	784
	Denied	5	37	42	57	111	100	248	600	833	771
	Subtotal, NS Concern Unresolved	23	79	93	121	223	317	659	1,515		
	% Approved	78%	53%	55%	53%	50%	68%	62%	60%		
NS Confirmed	Approved	2	69	83	54	60	42	47	357	700	596
	Denied	8	42	46	45	60	98	163	462	824	754
	Subtotal, NS Confirmed	10	111	129	99	120	140	210	819		
	% Approved	20%	62%	64%	55%	50%	30%	22%	44%		
NS Not Confirmed	Approved	53	415	406	335	172	93	189	1,663	504	430
	Denied	12	69	83	100	60	117	179	620	699	621
	Subtotal, NS Not Confirmed	65	484	489	435	232	210	368	2,283		
	% Approved	82%	86%	83%	77%	74%	44%	51%	73%		
Retd to Field-Non-NS	Approved	1	5	0	1	0	1	0	8	275	170
	Denied	0	0	0	0	0	0	1	1	329	329
	Subtotal, Retd to Field-Non-NS	1	5	0	1	0	1	1	9		
	% Approved	100%	100%	-	100%	-	100%	0%	89%		
Pending Elig Assess	Approved	0	0	0	0	0	0	0	0	-	-
	Denied	0	1	0	0	0	0	0	1	475	475
	Subtotal, Pending Elig Assess	0	1	0	0	0	0	0	1		
	% Approved	-	0%	-	-	-	-	-	0%		
Retd to Field-NS	Approved	0	0	0	0	1	0	0	1	481	481
	Denied	0	0	0	0	0	0	0	0	-	-
	Subtotal, Retd to Field-NS	0	0	0	0	1	0	0	1		
	% Approved	-	-	-	-	100%	-	-	100%		
N/A^[4]	Approved	1	12	0	1	2	0	0	16	271	179
	Denied	3	0	3	1	4	0	1	12	363	315
	Subtotal, N/A	4	12	3	2	6	0	1	28		
	% Approved	25%	100%	0%	50%	33%	-	0%	57%		

Approval and Denial Rates

Forms I-485 and N-400 Subject to CARRP

By Final Concern Type and Final Sub-status, using Most Recent CME prior to Last Status Date

		Fiscal Year of Last Status ^[1]								Mean	Median
		2013	2014	2015	2016	2017	2018	2019	All Years	Days Pending	Days Pending
Subtotal	Approved	461	2,046	2,298	2,390	2,937	3,631	4,380	18,143	588	557
	Denied	62	308	441	500	604	877	1,387	4,179	745	671
	Subtotal	523	2,354	2,739	2,890	3,541	4,508	5,767	22,322		
	% Approved	88%	87%	84%	83%	83%	81%	76%	81%		
No CME prior to Last Status^[2]	Approved	4	7	2	3	0	1	1	18	279	220
	Denied	1	2	6	3	6	1	2	21	367	351
	Subtotal	5	9	8	6	6	2	3	39		
	% Approved	80%	78%	25%	50%	0%	50%	33%	46%		
Total	Approved	465	2,053	2,300	2,393	2,937	3,632	4,381	18,161	588	557
	Denied	63	310	447	503	610	878	1,389	4,200	743	669
	Subtotal	528	2,363	2,747	2,896	3,547	4,510	5,770	22,361		
	% Approved	88%	87%	84%	83%	83%	81%	76%	81%		
	Admin Closed	3	20	29	49	63	74	152	390	823	711
	Withdrawn	0	0	0	0	1	7	25	33	540	484
	Pending	0	0	0	0	0	0	5,292	5,292	707	598
	Excluded Applications ^[3]	0	0	0	0	0	0	138	138	1,068	817
	Total CARRP Applications	531	2,383	2,776	2,945	3,611	4,591	11,377	28,214		

Source: CARRP Dataset

Note:

[1] The USCIS fiscal year is defined as October 1 through September 30 of the following year.

[2] Concern Type or Sub-status of No CME Prior to Last Status includes applications having no final Concern Type or Sub-status date prior to the last status date, or applications with only null values in the final Concern Type or Sub-status date fields.

[3] Excluded Applications includes Pending applications that had lawful permanent resident or United States citizen status for I-485 applications or United States citizen status for N-400 applications.

[4] N/A includes applications having a CME date prior to the last status date with a null value in the Sub-status field.

Applications Pending as of Fiscal Year End 2019^[1]

Forms I-485 and N-400 Subject to CARRP

By Final Concern Type and Final Sub-status, using Most Recent CME prior to Last Status Date

	Fiscal Year of Receipt ^[2]							All Years	Mean Days Pending	Median Days Pending
	2013	2014	2015	2016	2017	2018	2019			
Concern Type										
Non-NS	41	73	116	215	466	735	533	2,179	750	618
Non-KST	29	42	112	272	622	871	893	2,841	662	572
KST	2	15	21	41	36	33	57	205	902	899
Subtotal	72	130	249	528	1,124	1,639	1,483	5,225	708	600
No CME prior to 9/30/19	1	4	4	6	5	17	30	67	653	413
Total	73	134	253	534	1,129	1,656	1,513	5,292	707	598
Sub-status										
NS Concern Resolved	32	63	116	211	464	723	527	2,136	739	615
NS Not Confirmed	25	30	59	164	485	715	719	2,197	631	539
NS Confirmed	8	29	56	127	155	186	151	712	848	767
NS Concern Unresolved	7	12	21	30	23	30	103	226	724	473
Retd to Field-Non-NS	0	0	0	0	1	1	1	3	601	679
Retd to Field-NS	0	0	0	0	0	1	0	1	713	713
Field Determined- Vetted	1	0	0	0	0	0	0	1	2,299	2,299
Lead Invalidated	0	0	0	1	0	0	0	1	1,126	1,126
N/A ^[3]	0	0	1	1	0	0	7	9	404	98
Subtotal	73	134	253	534	1,128	1,656	1,508	5,286	708	599
No CME prior to 9/30/19	0	0	0	0	1	0	5	6	220	130
Total	73	134	253	534	1,129	1,656	1,513	5,292	707	598

Source: CARRP Dataset

Note:

[1] Pending applications includes I-485 and N-400 applications that had pending system statuses on 9/30/19 that did not have lawful permanent resident or United States citizen status for I-485, or United States citizen status for N-400.

[2] The USCIS fiscal year is defined as October 1 through September 30 of the following year.

[3] N/A includes applications having a CME date prior to the last status date with a null value in the Sub-status field.

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Approval and Denial Rates

Forms I-485 Subject to CARRP

By Final Concern Type and Final Sub-status, using Most Recent CME prior to Last Status Date

		Fiscal Year of Last Status ^[1]							All Years	Mean Days Pending	Median Days Pending
		2013	2014	2015	2016	2017	2018	2019			
Concern Type											
Non-NS	Approved	177	582	592	629	864	1,106	1,257	5,207	592	561
	Denied	11	58	101	88	106	183	305	852	757	692
	Subtotal, Non-NS	188	640	693	717	970	1,289	1,562	6,059		
	% Approved	94%	91%	85%	88%	89%	86%	80%	86%		
Non-KST	Approved	20	58	57	42	69	131	206	583	727	659
	Denied	5	46	28	53	78	100	194	504	747	668
	Subtotal, Non-KST	25	104	85	95	147	231	400	1,087		
	% Approved	80%	56%	67%	44%	47%	57%	52%	54%		
KST	Approved	0	3	1	1	2	3	1	11	662	409
	Denied	0	7	8	13	7	17	39	91	812	666
	Subtotal, KST	0	10	9	14	9	20	40	102		
	% Approved	-	30%	11%	7%	22%	15%	3%	11%		
Subtotal	Approved	197	643	650	672	935	1,240	1,464	5,801	606	568
	Denied	16	111	137	154	191	300	538	1,447	757	684
	Subtotal	213	754	787	826	1,126	1,540	2,002	7,248		
	% Approved	92%	85%	83%	81%	83%	81%	73%	80%		
No CME prior to Last Status^[2]	Approved	6	18	6	5	4	2	2	43	420	255
	Denied	3	3	4	4	5	2	4	25	612	516
	Subtotal	9	21	10	9	9	4	6	68		
	% Approved	67%	86%	60%	56%	44%	50%	33%	63%		
Total	Approved	203	661	656	677	939	1,242	1,466	5,844	605	567
	Denied	19	114	141	158	196	302	542	1,472	755	682
	Subtotal	222	775	797	835	1,135	1,544	2,008	7,316		
	% Approved	91%	85%	82%	81%	83%	80%	73%	80%		
	Admin Closed	2	9	8	20	17	18	24	98	662	571
	Withdrawn	0	0	0	0	0	0	0	0	-	-
	Pending	0	0	0	0	0	0	1,944	1,944	807	677
	Excluded Applications ^[3]	0	0	0	0	0	0	110	110	1,140	860
	Total CARRP Applications	224	784	805	855	1,152	1,562	4,086	9,468		

Approval and Denial Rates

Forms I-485 Subject to CARRP

By Final Concern Type and Final Sub-status, using Most Recent CME prior to Last Status Date

		Fiscal Year of Last Status ^[1]								Mean	Median
		2013	2014	2015	2016	2017	2018	2019	All Years	Days Pending	Days Pending
Sub-status											
NS Concern Resolved	Approved	158	453	500	572	854	1,118	1,253	4,908	605	573
	Denied	11	44	91	79	106	179	304	814	762	696
	Subtotal, NS Concern Resolved	169	497	591	651	960	1,297	1,557	5,722		
	% Approved	93%	91%	85%	88%	89%	86%	80%	86%		
NS Concern Unresolved	Approved	10	21	17	16	24	50	96	234	736	699
	Denied	2	15	15	25	40	36	71	204	776	716
	Subtotal, NS Concern Unresolved	12	36	32	41	64	86	167	438		
	% Approved	83%	58%	53%	39%	38%	58%	57%	53%		
NS Confirmed	Approved	1	17	25	18	24	25	37	147	798	730
	Denied	3	20	13	22	27	40	81	206	808	740
	Subtotal, NS Confirmed	4	37	38	40	51	65	118	353		
	% Approved	25%	46%	66%	45%	47%	38%	31%	42%		
NS Not Confirmed	Approved	29	157	112	67	37	48	79	529	510	422
	Denied	2	34	18	29	17	47	84	231	689	602
	Subtotal, NS Not Confirmed	31	191	130	96	54	95	163	760		
	% Approved	94%	82%	86%	70%	69%	51%	48%	70%		
Retd to Field-Non-NS	Approved	1	0	0	0	0	0	0	1	93	93
	Denied	0	0	0	0	0	0	0	0	-	-
	Subtotal, Retd to Field-Non-NS	1	0	0	0	0	0	0	1		
	% Approved	100%	-	-	-	-	-	-	100%		
Pending Elig Assess	Approved	0	0	0	0	0	0	0	0	-	-
	Denied	0	0	0	0	0	0	0	0	-	-
	Subtotal, Pending Elig Assess	0	0	0	0	0	0	0	0		
	% Approved	-	-	-	-	-	-	-	-		
Retd to Field-NS	Approved	0	0	0	0	0	0	0	0	-	-
	Denied	0	0	0	0	0	0	0	0	-	-
	Subtotal, Retd to Field-NS	0	0	0	0	0	0	0	0		
	% Approved	-	-	-	-	-	-	-	-		
N/A^[4]	Approved	0	6	0	1	0	0	0	7	262	157
	Denied	0	0	1	1	3	0	1	6	521	515
	Subtotal, N/A	0	6	1	2	3	0	1	13		
	% Approved	-	100%	0%	50%	0%	-	0%	54%		

Approval and Denial Rates

Forms I-485 Subject to CARRP

By Final Concern Type and Final Sub-status, using Most Recent CME prior to Last Status Date

		Fiscal Year of Last Status ^[1]								Mean	Median
		2013	2014	2015	2016	2017	2018	2019	All Years	Days Pending	Days Pending
Subtotal	Approved	199	654	654	674	939	1,241	1,465	5,826	606	567
	Denied	18	113	138	156	193	302	541	1,461	758	685
	Subtotal	217	767	792	830	1,132	1,543	2,006	7,287		
	<i>% Approved</i>	92%	85%	83%	81%	83%	80%	73%	80%		
No CME prior to Last Status^[2]	Approved	4	7	2	3	0	1	1	18	279	220
	Denied	1	1	3	2	3	0	1	11	305	284
	Subtotal	5	8	5	5	3	1	2	29		
	<i>% Approved</i>	80%	88%	40%	60%	0%	100%	50%	62%		
Total	Approved	203	661	656	677	939	1,242	1,466	5,844	605	567
	Denied	19	114	141	158	196	302	542	1,472	755	682
	Subtotal	222	775	797	835	1,135	1,544	2,008	7,316		
	<i>% Approved</i>	91%	85%	82%	81%	83%	80%	73%	80%		
	Admin Closed	2	9	8	20	17	18	24	98	662	571
	Withdrawn	0	0	0	0	0	0	0	0	-	-
	Pending	0	0	0	0	0	0	1,944	1,944	807	677
	Excluded Applications ^[3]	0	0	0	0	0	0	110	110	1,140	860
	Total CARRP Applications	224	784	805	855	1,152	1,562	4,086	9,468		

Source: CARRP Dataset

Note:

[1] The USCIS fiscal year is defined as October 1 through September 30 of the following year.

[2] Concern Type or Sub-status of No CME Prior to Last Status includes applications having no final Concern Type or Sub-status date prior to the last status date, or applications with only null values in the final Concern Type or Sub-status date fields.

[3] Excluded applications includes Pending applications that had lawful permanent resident or United States citizen status for I-485 applications.

[4] N/A includes applications having a CME date prior to the last status date with a null value in the Sub-status field.

Applications Pending as of Fiscal Year End 2019^[1]

Forms I-485 Subject to CARRP

By Final Concern Type and Final Sub-status, using Most Recent CME prior to Last Status Date

	Fiscal Year of Receipt ^[2]							All Years	Mean Days Pending	Median Days Pending
	2013	2014	2015	2016	2017	2018	2019			
Concern Type										
Non-NS	26	41	63	93	151	230	141	745	882	735
Non-KST	22	31	46	133	223	329	295	1,079	737	627
KST	1	7	12	22	19	17	21	99	972	931
Subtotal	49	79	121	248	393	576	457	1,923	805	675
No CME prior to 9/30/19	1	3	2	3	2	4	6	21	998	805
Total	50	82	123	251	395	580	463	1,944	807	677
Sub-status										
NS Concern Resolved	21	39	62	92	144	227	140	725	869	724
NS Not Confirmed	18	23	29	77	170	271	228	816	709	581
NS Confirmed	3	11	17	68	69	67	51	286	890	877
NS Concern Unresolved	7	9	15	14	11	13	41	110	923	805
Retd to Field-Non-NS	0	0	0	0	0	1	0	1	679	679
Retd to Field-NS	0	0	0	0	0	1	0	1	713	713
Field Determined- Vetted	1	0	0	0	0	0	0	1	2,299	2,299
Lead Invalidated	0	0	0	0	0	0	0	0	-	-
N/A ^[3]	0	0	0	0	0	0	0	0	-	-
Subtotal	50	82	123	251	394	580	460	1,940	808	678
No CME prior to 9/30/19	0	0	0	0	1	0	3	4	279	134
Total	50	82	123	251	395	580	463	1,944	807	677

Source: CARRP Dataset

Note:

[1] Pending applications includes I-485 applications that had pending system statuses on 9/30/19 that did not have lawful permanent resident or United States citizen status.

[2] The USCIS fiscal year is defined as October 1 through September 30 of the following year.

[3] N/A includes applications having a CME date prior to the last status date with a null value in the Sub-status field.

Approval and Denial Rates

Forms N-400 Subject to CARRP

By Final Concern Type and Final Sub-status, using Most Recent CME prior to Last Status Date

		Fiscal Year of Last Status ^[1]								Mean	Median
		2013	2014	2015	2016	2017	2018	2019	All Years	Days Pending	Days Pending
Concern Type											
Non-NS	Approved	235	1,206	1,482	1,600	1,785	2,140	2,468	10,916	563	538
	Denied	25	121	207	248	271	390	495	1,757	703	630
	Subtotal, Non-NS	260	1,327	1,689	1,848	2,056	2,530	2,963	12,673		
	<i>% Approved</i>	90%	91%	88%	87%	87%	85%	83%	86%		
Non-KST	Approved	19	173	148	103	207	236	436	1,322	723	698
	Denied	12	55	79	81	125	160	308	820	796	749
	Subtotal, Non-KST	31	228	227	184	332	396	744	2,142		
	<i>% Approved</i>	61%	76%	65%	56%	62%	60%	59%	62%		
KST	Approved	0	1	5	3	2	2	1	14	697	596
	Denied	2	10	12	13	10	21	34	102	897	752
	Subtotal, KST	2	11	17	16	12	23	35	116		
	<i>% Approved</i>	0%	9%	29%	19%	17%	9%	3%	12%		
Subtotal	Approved	254	1,380	1,635	1,706	1,994	2,378	2,905	12,252	580	553
	Denied	39	186	298	342	406	571	837	2,679	739	665
	Subtotal	293	1,566	1,933	2,048	2,400	2,949	3,742	14,931		
	<i>% Approved</i>	87%	88%	85%	83%	83%	81%	78%	82%		
No CME prior to Last Status^[2]	Approved	8	12	9	10	4	12	10	65	524	406
	Denied	5	10	8	3	8	5	10	49	589	463
	Subtotal	13	22	17	13	12	17	20	114		
	<i>% Approved</i>	62%	55%	53%	77%	33%	71%	50%	57%		
Total	Approved	262	1,392	1,644	1,716	1,998	2,390	2,915	12,317	580	552
	Denied	44	196	306	345	414	576	847	2,728	736	661
	Subtotal	306	1,588	1,950	2,061	2,412	2,966	3,762	15,045		
	<i>% Approved</i>	86%	88%	84%	83%	83%	81%	77%	82%		
	Admin Closed	1	11	21	29	46	56	128	292	877	754
	Withdrawn	0	0	0	0	1	7	25	33	540	484
	Pending	0	0	0	0	0	0	3,348	3,348	649	560
	Excluded Applications ^[3]	0	0	0	0	0	0	28	28	782	656
	Total CARRP Applications	307	1,599	1,971	2,090	2,459	3,029	7,291	18,746		

Approval and Denial Rates

Forms N-400 Subject to CARRP

By Final Concern Type and Final Sub-status, using Most Recent CME prior to Last Status Date

		Fiscal Year of Last Status ^[1]								Mean	Median
		2013	2014	2015	2016	2017	2018	2019	All Years	Days Pending	Days Pending
Sub-status											
NS Concern Resolved	Approved	228	1,050	1,258	1,363	1,736	2,160	2,480	10,275	571	548
	Denied	23	115	176	218	263	383	491	1,669	703	634
	Subtotal, NS Concern Resolved	251	1,165	1,434	1,581	1,999	2,543	2,971	11,944		
	% Approved	91%	90%	88%	86%	87%	85%	83%	86%		
NS Concern Unresolved	Approved	8	21	34	48	88	167	315	681	842	818
	Denied	3	22	27	32	71	64	177	396	863	818
	Subtotal, NS Concern Unresolved	11	43	61	80	159	231	492	1,077		
	% Approved	73%	49%	56%	60%	55%	72%	64%	63%		
NS Confirmed	Approved	1	52	58	36	36	17	10	210	632	559
	Denied	5	22	33	23	33	58	82	256	836	780
	Subtotal, NS Confirmed	6	74	91	59	69	75	92	466		
	% Approved	17%	70%	64%	61%	52%	23%	11%	45%		
NS Not Confirmed	Approved	24	258	294	268	135	45	110	1,134	501	437
	Denied	10	35	65	71	43	70	95	389	705	631
	Subtotal, NS Not Confirmed	34	293	359	339	178	115	205	1,523		
	% Approved	71%	88%	82%	79%	76%	39%	54%	74%		
Retd to Field-Non-NS	Approved	0	5	0	1	0	1	0	7	301	177
	Denied	0	0	0	0	0	0	1	1	329	329
	Subtotal, Retd to Field-Non-NS	0	5	0	1	0	1	1	8		
	% Approved	-	100%	-	100%	-	100%	0%	88%		
Pending Elig Assess	Approved	0	0	0	0	0	0	0	0	-	-
	Denied	0	1	0	0	0	0	0	1	475	475
	Subtotal, Pending Elig Assess	0	1	0	0	0	0	0	1		
	% Approved	-	0%	-	-	-	-	-	0%		
Retd to Field-NS	Approved	0	0	0	0	1	0	0	1	481	481
	Denied	0	0	0	0	0	0	0	0	-	-
	Subtotal, Retd to Field-NS	0	0	0	0	1	0	0	1		
	% Approved	-	-	-	-	100%	-	-	100%		
N/A^[4]	Approved	1	6	0	0	2	0	0	9	278	273
	Denied	3	0	2	0	1	0	0	6	205	209
	Subtotal, N/A	4	6	2	0	3	0	0	15		
	% Approved	25%	100%	0%	-	67%	-	-	60%		

Approval and Denial Rates

Forms N-400 Subject to CARRP

By Final Concern Type and Final Sub-status, using Most Recent CME prior to Last Status Date

		Fiscal Year of Last Status ^[1]								Mean	Median
		2013	2014	2015	2016	2017	2018	2019	All Years	Days Pending	Days Pending
Subtotal	Approved	262	1,392	1,644	1,716	1,998	2,390	2,915	12,317	580	552
	Denied	44	195	303	344	411	575	846	2,718	738	662
	Subtotal	306	1,587	1,947	2,060	2,409	2,965	3,761	15,035		
	<i>% Approved</i>	86%	88%	84%	83%	83%	81%	78%	82%		
No CME prior to Last Status^[2]	Approved	0	0	0	0	0	0	0	0	-	-
	Denied	0	1	3	1	3	1	1	10	436	390
	Subtotal	0	1	3	1	3	1	1	10		
	<i>% Approved</i>	-	0%	0%	0%	0%	0%	0%	0%		
Total	Approved	262	1,392	1,644	1,716	1,998	2,390	2,915	12,317	580	552
	Denied	44	196	306	345	414	576	847	2,728	736	661
	Subtotal	306	1,588	1,950	2,061	2,412	2,966	3,762	15,045		
	<i>% Approved</i>	86%	88%	84%	83%	83%	81%	77%	82%		
	Admin Closed	1	11	21	29	46	56	128	292	877	754
	Withdrawn	0	0	0	0	1	7	25	33	540	484
	Pending	0	0	0	0	0	0	3,348	3,348	649	560
	Excluded Applications ^[3]	0	0	0	0	0	0	28	28	782	656
	Total CARRP Applications	307	1,599	1,971	2,090	2,459	3,029	7,291	18,746		

Source: CARRP Dataset

Note:

[1] The USCIS fiscal year is defined as October 1 through September 30 of the following year.

[2] Concern Type or Sub-status of No CME Prior to Last Status includes applications having no final Concern Type or Sub-status date prior to the last status date, or applications with only null values in the final Concern Type or Sub-status date fields.

[3] Excluded applications includes Pending applications that had United States citizen status for N-400 applications.

[4] N/A includes applications having a CME date prior to the last status date with a null value in the Sub-status field.

Applications Pending as of Fiscal Year End 2019^[1]

Forms N-400 Subject to CARRP

By Final Concern Type and Final Sub-status, using Most Recent CME prior to Last Status Date

	Fiscal Year of Receipt ^[2]							All Years	Mean Days Pending	Median Days Pending
	2013	2014	2015	2016	2017	2018	2019			
Concern Type										
Non-NS	15	32	53	122	315	505	392	1,434	682	579
Non-KST	7	11	66	139	399	542	598	1,762	616	542
KST	1	8	9	19	17	16	36	106	838	785
Subtotal	23	51	128	280	731	1,063	1,026	3,302	652	564
No CME prior to 9/30/19	0	1	2	3	3	13	24	46	495	363
Total	23	52	130	283	734	1,076	1,050	3,348	649	560
Sub-status										
NS Concern Resolved	11	24	54	119	320	496	387	1,411	672	577
NS Not Confirmed	7	7	30	87	315	444	491	1,381	585	521
NS Confirmed	5	18	39	59	86	119	100	426	820	717
NS Concern Unresolved	0	3	6	16	12	17	62	116	536	290
Retd to Field-Non-NS	0	0	0	0	1	0	1	2	562	562
Retd to Field-NS	0	0	0	0	0	0	0	0	-	-
Field Determined- Vetted	0	0	0	0	0	0	0	0	-	-
Lead Invalidated	0	0	0	1	0	0	0	1	1,126	1,126
N/A ^[3]	0	0	1	1	0	0	7	9	404	98
Subtotal	23	52	130	283	734	1,076	1,048	3,346	650	560
No CME prior to 9/30/19	0	0	0	0	0	0	2	2	103	103
Total	23	52	130	283	734	1,076	1,050	3,348	649	560

Source: CARRP Dataset

Note:

[1] Pending applications includes N-400 applications that had pending system statuses on 9/30/19 that did not have United States citizen status.

[2] The USCIS fiscal year is defined as October 1 through September 30 of the following year.

[3] N/A includes applications having a CME date prior to the last status date with a null value in the Sub-status field.

Approved, Denied, and Pending Applications Received Fiscal Years 2013–2019

Forms I-485 and N-400 Subject to CARRP

By Final Concern Type and Final Sub-status Pairing, using Most Recent CME prior to Last Status Date

Concern Type ^[1]	Sub-status ^{[1][2]}	Approved			Denied			Pending as of FYE 2019 ^[3]		
		Count	Mean Days Pending	Median Days Pending	Count	Mean Days Pending	Median Days Pending	Count	Mean Days Pending	Median Days Pending
Non-NS	NS Concern Resolved	14,887	581	556	2,423	724	653	2,107	739	613
Non-NS	NS Not Confirmed	1,066	443	389	142	667	536	42	1,083	763
Non-KST	NS Concern Unresolved	782	837	811	471	848	811	177	668	367
Non-KST	NS Not Confirmed	574	620	579	457	708	648	2,122	623	542
Non-KST	NS Confirmed	276	741	673	337	801	753	510	818	735
Non-KST	NS Concern Resolved	264	616	603	49	676	675	24	779	914
Non-NS	NS Concern Unresolved	93	622	576	24	821	750	20	990	980
Non-NS	NS Confirmed	71	553	457	15	757	627	9	1,492	1,125
No CME prior to Last Status	NS Concern Resolved	29	370	231	8	458	352	5	729	188
No CME prior to Last Status	NS Concern Unresolved	27	815	841	19	717	656	12	573	278
No CME prior to Last Status	NS Not Confirmed	21	464	406	14	700	750	25	676	500
KST	NS Concern Unresolved	13	850	1,079	86	780	667	17	1,105	1,315
No CME prior to Last Status	N/A	10	279	264	7	339	299	3	136	98
No CME prior to Last Status	No CME prior to Last Status	9	232	219	9	474	420	3	130	178
Non-KST	No CME prior to Last Status	7	385	435	10	321	318	3	310	82
No CME prior to Last Status	Retd to Field-Non-NS	7	282	163	1	329	329	3	601	679
KST	NS Confirmed	6	649	568	95	946	928	180	910	906
No CME prior to Last Status	NS Confirmed	4	578	508	15	642	604	13	736	545
Non-NS	N/A	3	436	184	5	397	331	1	7	7
KST	NS Concern Resolved	3	520	600	3	977	553	0	-	-
KST	NS Not Confirmed	2	251	251	7	767	550	8	292	301
Non-KST	N/A	2	108	108	0	-	-	5	645	235
Non-NS	No CME prior to Last Status	2	115	115	0	-	-	0	-	-
No CME prior to Last Status	Retd to Field-NS	1	481	481	0	-	-	1	713	713
KST	N/A	1	21	21	0	-	-	0	-	-
Non-NS	Retd to Field-Non-NS	1	226	226	0	-	-	0	-	-
KST	No CME prior to Last Status	0	-	-	2	117	117	0	-	-
No CME prior to Last Status	Pending Elig Assess	0	-	-	1	475	475	0	-	-
No CME prior to Last Status	Field Determined- Vetted	0	-	-	0	-	-	1	2,299	2,299
No CME prior to Last Status	Lead Invalidated	0	-	-	0	-	-	1	1,126	1,126
Total		18,161	588	557	4,200	743	669	5,292	707	598

Source: CARRP Dataset

Note:

[1] Concern Type or Sub-status of No CME Prior to Last Status includes applications having no final Concern Type or Sub-status date prior to the last status date, or applications with only null values in the final Concern Type or Sub-status date fields.

[2] Sub-status of N/A includes applications having a CME date prior to the last status date with a null value in the Sub-status field.

[3] Pending applications includes I-485 and N-400 applications that had pending system statuses on 9/30/19 that did not have lawful permanent resident or United States citizen status for I-485, or United States citizen status for N-400.

Approved, Denied, and Pending Applications Received Fiscal Years 2013–2019

Forms I-485 Subject to CARRP

By Final Concern Type and Final Sub-status Pairing, using Most Recent CME prior to Last Status Date

Concern Type ^[1]	Sub-status ^{[1][2]}	Approved			Denied			Pending as of FYE 2019 ^[3]		
		Count	Mean Days Pending	Median Days Pending	Count	Mean Days Pending	Median Days Pending	Count	Mean Days Pending	Median Days Pending
Non-NS	NS Concern Resolved	4,823	603	573	799	765	698	717	870	724
Non-NS	NS Not Confirmed	315	430	342	40	643	560	15	1,289	1,221
Non-KST	NS Concern Unresolved	178	779	746	158	791	747	79	837	532
Non-KST	NS Not Confirmed	206	628	577	184	696	609	791	696	577
Non-KST	NS Confirmed	116	864	755	141	804	751	200	865	826
Non-KST	NS Concern Resolved	75	707	619	13	589	614	6	778	761
Non-NS	NS Concern Unresolved	41	623	553	4	834	882	11	1,000	980
Non-NS	NS Confirmed	25	512	400	6	507	344	2	1,751	1,751
No CME prior to Last Status	NS Concern Resolved	10	533	499	2	585	585	2	1,013	1,013
No CME prior to Last Status	NS Concern Unresolved	8	391	205	7	614	399	6	981	966
No CME prior to Last Status	NS Not Confirmed	8	616	360	6	723	815	6	1,203	1,272
KST	NS Concern Unresolved	7	689	409	35	735	624	14	1,325	1,603
No CME prior to Last Status	N/A	4	172	166	3	520	433	0	-	-
No CME prior to Last Status	No CME prior to Last Status	9	232	219	2	488	488	1	186	186
Non-KST	No CME prior to Last Status	7	385	435	8	290	284	3	310	82
No CME prior to Last Status	Retd to Field-Non-NS	1	93	93	0	-	-	1	679	679
KST	NS Confirmed	3	812	562	54	872	746	81	942	931
No CME prior to Last Status	NS Confirmed	3	606	522	5	593	609	3	650	565
Non-NS	N/A	1	1,009	1,009	3	522	597	0	-	-
KST	NS Concern Resolved	0	-	-	0	-	-	0	-	-
KST	NS Not Confirmed	0	-	-	1	1,028	1,028	4	345	344
Non-KST	N/A	1	118	118	0	-	-	0	-	-
Non-NS	No CME prior to Last Status	2	115	115	0	-	-	0	-	-
No CME prior to Last Status	Retd to Field-NS	0	-	-	0	-	-	1	713	713
KST	N/A	1	21	21	0	-	-	0	-	-
Non-NS	Retd to Field-Non-NS	0	-	-	0	-	-	0	-	-
KST	No CME prior to Last Status	0	-	-	1	58	58	0	-	-
No CME prior to Last Status	Pending Elig Assess	0	-	-	0	-	-	0	-	-
No CME prior to Last Status	Field Determined- Vetted	0	-	-	0	-	-	1	2,299	2,299
No CME prior to Last Status	Lead Invalidated	0	-	-	0	-	-	0	-	-
Total		5,844	605	567	1,472	755	682	1,944	807	677

Source: CARRP Dataset

Note:

[1] Concern Type or Sub-status of No CME Prior to Last Status includes applications having no final Concern Type or Sub-status date prior to the last status date, or applications with only null values in the final Concern Type or Sub-status date fields.

[2] Sub-status of N/A includes applications having a CME date prior to the last status date with a null value in the Sub-status field.

[3] Pending applications includes I-485 applications that had pending system statuses on 9/30/19 that did not have lawful permanent resident or United States citizen status.

Approved, Denied, and Pending Applications Received Fiscal Years 2013–2019

Forms N-400 Subject to CARRP

By Final Concern Type and Final Sub-status Pairing, using Most Recent CME prior to Last Status Date

Concern Type ^[1]	Sub-status ^{[1][2]}	Approved			Denied			Pending as of FYE 2019 ^[3]		
		Count	Mean Days Pending	Median Days Pending	Count	Mean Days Pending	Median Days Pending	Count	Mean Days Pending	Median Days Pending
Non-NS	NS Concern Resolved	10,064	571	548	1,624	703	634	1,390	671	575
Non-NS	NS Not Confirmed	751	448	402	102	676	529	27	968	657
Non-KST	NS Concern Unresolved	604	854	828	313	878	848	98	532	290
Non-KST	NS Not Confirmed	368	615	582	273	716	673	1,331	580	522
Non-KST	NS Confirmed	160	651	564	196	798	761	310	787	696
Non-KST	NS Concern Resolved	189	580	572	36	708	692	18	780	914
Non-NS	NS Concern Unresolved	52	621	595	20	819	723	9	978	707
Non-NS	NS Confirmed	46	576	491	9	924	674	7	1,418	1,125
No CME prior to Last Status	NS Concern Resolved	19	284	211	6	415	352	3	540	188
No CME prior to Last Status	NS Concern Unresolved	19	994	877	12	777	783	6	165	137
No CME prior to Last Status	NS Not Confirmed	13	371	406	8	683	750	19	510	374
KST	NS Concern Unresolved	6	1,039	1,080	51	811	679	3	79	93
No CME prior to Last Status	N/A	6	351	311	4	203	205	3	136	98
No CME prior to Last Status	No CME prior to Last Status	0	-	-	7	470	420	2	103	103
Non-KST	No CME prior to Last Status	0	-	-	2	446	446	0	-	-
No CME prior to Last Status	Retd to Field-Non-NS	6	314	170	1	329	329	2	562	562
KST	NS Confirmed	3	487	574	41	1,042	1,058	99	885	892
No CME prior to Last Status	NS Confirmed	1	493	493	10	666	534	10	762	530
Non-NS	N/A	2	150	150	2	209	209	1	7	7
KST	NS Concern Resolved	3	520	600	3	977	553	0	-	-
KST	NS Not Confirmed	2	251	251	6	724	531	4	240	239
Non-KST	N/A	1	98	98	0	-	-	5	645	235
Non-NS	No CME prior to Last Status	0	-	-	0	-	-	0	-	-
No CME prior to Last Status	Retd to Field-NS	1	481	481	0	-	-	0	-	-
KST	N/A	0	-	-	0	-	-	0	-	-
Non-NS	Retd to Field-Non-NS	1	226	226	0	-	-	0	-	-
KST	No CME prior to Last Status	0	-	-	1	175	175	0	-	-
No CME prior to Last Status	Pending Elig Assess	0	-	-	1	475	475	0	-	-
No CME prior to Last Status	Field Determined- Vetted	0	-	-	0	-	-	0	-	-
No CME prior to Last Status	Lead Invalidated	0	-	-	0	-	-	1	1,126	1,126
Total		12,317	580	552	2,728	736	661	3,348	649	560

Source: CARRP Dataset

Note:

[1] Concern Type or Sub-status of No CME Prior to Last Status includes applications having no final Concern Type or Sub-status date prior to the last status date, or applications with only null values in the final Concern Type or Sub-status date fields.

[2] Sub-status of N/A includes applications having a CME date prior to the last status date with a null value in the Sub-status field.

[3] Pending applications includes N-400 applications that had pending system statuses on 9/30/19 that did not have United States citizen status.

Potential Data Anomalies in the CARRP Dataset^[1]

Applications with Concern Type Non-NS Corresponding to CME Open Date

Applications Received FY 2013–FY 2019

newid	form_number	receipt_date	current_status	current_status_date	CME_1_NS_Con_Type_Old_1	CME_1_NS_Con_Type_New_1	CME_1_NS_Con_Type_Change_Date_1
1.	01F1M4B60H						
2.	0BZI6IT7ZI						
3.	0WVR7SD09F						
4.	1DNAEQVM2Q						
5.	2GUSQ3VVDU						
6.	3BBKJ5K46D						
7.	3CSYFDH73B						
8.	5O2ZZTBRGZ						
9.	672EUH13Q5						
10.	6IT6ZYHBQ3						
11.	6NEQWYPH7F						
12.	76MR7I7W7F						
13.	7DAP3KJUXB						
14.	87KYR00ONJ						
15.	99P4OW3U08						
16.	CME5GKM2LE						
17.	CMZVQ4E6A6						
18.	DKDZ5K1ETO						
19.	DMSS570U7F						
20.	EDPZ5L9BM2						
21.	EKHCQVDISP						
22.	F7GJH4RBWY						
23.	HQTHAL80SO						
24.	J7JRUAJ81X						
25.	KSGRRE1TIT						
26.	KU8XPTFN7E						
27.	LTYCEOEFBK						
28.	ML8V0IZ1C1						
29.	MQF2Z7LUXV						
30.	NEK1FOIXAI						
31.	NEX3YHU3MX						
32.	NW73DEN8RQ						
33.	OG5A3YTO7X						

Potential Data Anomalies in the CARRP Dataset^[1]

Applications with Concern Type Non-NS Corresponding to CME Open Date

Applications Received FY 2013–FY 2019

newid	form_number	receipt_date	current_status	current_status_date	CME_1_NS_Con_Type_Old_1	CME_1_NS_Con_Type_New_1	CME_1_NS_Con_Type_Change_Date_1
34. PFDSX2P9YH							
35. PV766TUXKO							
36. QK86ETDRE6							
37. RDEUS25CZF							
38. S7MG3XGUB4							
39. SE6QMTDRWW							
40. T1K9SGWYG4							
41. VTZIYQH69S							
42. WD255S2ADN							
43. YD8SREGUVU							

Source: CARRP Dataset

Note:

[1] "(null)" values represent blank values in the original CARRP Dataset.

Potential Data Anomalies in the CARRP Dataset

Applications with Final Concern Type Non-NS and Final Sub-status NS Concern Resolved

Applications Received FY 2013–FY 2019

newid	form_ number	receipt _date	current _status	current_ status_date	cme_1_final _substatus	cme_1_final_ substatus_dt	cme_1_ final_concern	cme_1_final_ concern_dt
1. 0A7CCBHGIH								
2. 16JDO61X76								
3. 1D2NXOPBK0								
4. 1TVJG36TP2								
5. 2563UJQTEJ								
6. 2VWF9Z8FR9								
7. 2YHR8XFRZX								
8. 31UI7NT7E2								
9. 37X0IMSQJX								
10. 37YCVVTX1O								
11. 39TUS03SIG								
12. 3B0WWB2M4Z								
13. 4J7IPCQDS2								
14. 5KQYAJM0Q7								
15. 5NYS9SQ19U								
16. 5U2PDMXPXR								
17. 6HFAC6JBTW								
18. 6LMA98DALJ								
19. 73BP71ODO7								
20. 89CDL4ZECJ								
21. 8GWABRQEX7								
22. 90P5FQIWNJ								
23. 9UFLU1L7CU								
24. 9UX2INS5VH								
25. 9WFG0YEH4								
26. AAM5PYVTDH								
27. AEND87GD5J								
28. B8DE8VQMFM								
29. BMJZPAYSUI								
30. BSLT8ZMF9V								
31. C7G7GZETHA								
32. C7ZTE30VJN								
33. DJQQA7MRIQ								

Potential Data Anomalies in the CARRP Dataset

Applications with Final Concern Type Non-NS and Final Sub-status NS Concern Resolved

Applications Received FY 2013–FY 2019

newid	form_ number	receipt _date	current _status	current_ status_date	cme_1_final _substatus	cme_1_final_ substatus_dt	cme_1_ final_concern	cme_1_final_ concern_dt
34. DMPVJ34X4U	I485							
35. DRG224V1NC	I485							
36. E3E550QQMM	I485							
37. EEA31J3X3A	N400							
38. EGPJRMILL1	I485							
39. EIFNJMJA6G	I485							
40. EII4QZHFTT	N400							
41. EUYHAYXDZK	I485							
42. F7PTTSRVGT	I485							
43. FFSK8TV7C2	N400							
44. GODBDEO4SF	I485							
45. H74RTVLPME	I485							
46. HEM860GLEZ	I485							
47. HTX3RSDPN4	N400							
48. IL6XXB2Z2P	I485							
49. IYKQNFPEHR	I485							
50. JQJYK56LAL	N400							
51. JYASTOUI9C	N400							
52. KPHDACYSRG	N400							
53. KSDWZPHTJI	N400							
54. KUP5GYAW5S	I485							
55. KVKR6FOCGX	I485							
56. KYLMPCEQP5	N400							
57. KZYKRPFHD2	I485							
58. L42G1AIE97	I485							
59. LN1JEHGGOE	I485							
60. LU76J5TE83	I485							
61. MGVZ7NGRFC	I485							
62. MSCPMYEONW	N400							
63. NEWLMW8GYK	I485							
64. NO0EN2NN96	I485							
65. OA828XFWT4	N400							
66. OQ3EVH7A7B	N400							

Potential Data Anomalies in the CARRP Dataset

Applications with Final Concern Type Non-NS and Final Sub-status NS Concern Resolved

Applications Received FY 2013–FY 2019

newid	form_ number	receipt _date	current _status	current_ status_date	cme_1_final _substatus	cme_1_final_ substatus_dt	cme_1_ final_concern	cme_1_final_ concern_dt
67. ORD15U73YO	I485							
68. Q4RQ14LPVM	N400							
69. QE1RYFLA7K	I485							
70. QT6V10HJ2P	N400							
71. R3S39858YU	N400							
72. RL4785FWUR	I485							
73. RU67O7L4LR	N400							
74. S0DTD1IMAP	N400							
75. S239FXF7SO	I485							
76. SM4AXOZSHB	I485							
77. SM8YICGGF7	I485							
78. SQLCO03Z94	N400							
79. SVISA0B8LZ	N400							
80. T2GUMVL97F	I485							
81. T8K6N6GQSI	N400							
82. T8LI6A8RKA	N400							
83. TMIK1XZ4UN	N400							
84. TPHCHRF5G	I485							
85. U53ADETH6U	I485							
86. UHEB0C6KCO	I485							
87. UV8ZW2PUPS	I485							
88. V15I69OVBU	I485							
89. WEHETCSFMF	N400							
90. X3YEQLZL5L	I485							
91. XHPNUR9TXM	I485							
92. XKFXIM7BQU	I485							
93. XLTFD370SQ	N400							
94. YCJ0NO694E	I485							
95. YFBUDO8WZM	N400							
96. YIFYA8TU8J	N400							
97. YQHU4NH8H9	I485							
98. ZEKAV1WLMV	I485							

Source: CARRP Dataset

EXHIBIT BX

Potential Data Anomalies in the CARRP Dataset^[1]

Applications with No Final Concern Type and No Final Sub-status or Null Sub-Status

Applications Received FY 2013–FY 2019

newid	form_ number	receipt _date	current _status	current_ status_date	cme_1_final _substatus	cme_1_final_ substatus_dt	cme_1_ final_concern	cme_1_final_ concern_dt	cme_2_final _substatus	CME_2_final_ substatus_dt	cme_2_final _concern	CME_2_final _concern_dt
1.	1IWBAZE3AN	I485					(null)	(null)	(null)	(null)	(null)	(null)
2.	1TI0A9KMMN	I485					(null)	(null)	(null)	(null)	(null)	(null)
3.	1Y3TYX6R25	I485					(null)	(null)	(null)	(null)	(null)	(null)
4.	2HC9BOJBEZ	N400					(null)	(null)	(null)	(null)	(null)	(null)
5.	45MX2T7NE7	I485					(null)	(null)	(null)	(null)	(null)	(null)
6.	6U209BQHGH	N400					(null)	(null)	(null)	(null)	(null)	(null)
7.	72J0D9J118	I485					(null)	(null)	(null)	(null)	(null)	(null)
8.	7XKQU5F3VH	I485					(null)	(null)	(null)	(null)	(null)	(null)
9.	9F1DOWL6EO	I485							(null)	(null)	(null)	(null)
10.	B59S3R6NXJ	I485					(null)	(null)	(null)	(null)	(null)	(null)
11.	B7BT1TYGGR	N400					(null)	(null)	(null)	(null)	(null)	(null)
12.	BA95NQOU6C	I485					(null)	(null)	(null)	(null)	(null)	(null)
13.	C3J2HH6B8A	N400					(null)	(null)	(null)	(null)	(null)	(null)
14.	C7G7GZETHA	I485							(null)	(null)	(null)	(null)
15.	CBXGGQ3LDB	N400					(null)	(null)	(null)	(null)	(null)	(null)
16.	CDKWSV10QN	I485					(null)	(null)	(null)	(null)	(null)	(null)
17.	FCDW88Y25D	N400					(null)	(null)	(null)	(null)	(null)	(null)
18.	FHUXWSW715	I485							(null)	(null)	(null)	(null)
19.	G5RAKL0TIN	I485					(null)	(null)	(null)	(null)	(null)	(null)
20.	GNOCD65HIT	I485					(null)	(null)	(null)	(null)	(null)	(null)
21.	GWTZ8ALU3T	N400							(null)	(null)	(null)	(null)
22.	IR0L9GIKQN	N400					(null)	(null)	(null)	(null)	(null)	(null)
23.	KFLJJ3C873	N400					(null)	(null)	(null)	(null)	(null)	(null)
24.	L3YIYMUWWX	N400					(null)	(null)	(null)		(null)	(null)
25.	LKDG6CS50U	N400					(null)	(null)	(null)	(null)	(null)	(null)
26.	OYHV4O2TAM	I485							(null)	(null)	(null)	(null)
27.	PRC9XEZRMM	I485					(null)	(null)	(null)	(null)	(null)	(null)
28.	QPUHYORLTI	N400					(null)	(null)	(null)	(null)	(null)	(null)
29.	QQ8KHWV4ZN	I485					(null)	(null)	(null)	(null)	(null)	(null)
30.	QXNR34GBWI	N400							(null)	(null)	(null)	(null)
31.	RTP4LEAAEG	N400					(null)	(null)	(null)	(null)	(null)	(null)
32.	S7JYAC7QW7	I485							(null)	(null)	(null)	(null)
33.	SE2O6MRYL4	N400					(null)	(null)	(null)	(null)	(null)	(null)
34.	SFK3OBZMRB	N400					(null)	(null)	(null)	(null)	(null)	(null)
35.	SQ5LWIKKLF	N400					(null)	(null)	(null)	(null)	(null)	(null)
36.	UCCDVR25P6	N400							(null)	(null)	(null)	(null)
37.	UTL8BSZMFU	N400					(null)	(null)	(null)	(null)	(null)	(null)
38.	UTSWA4XM5L	N400					(null)	(null)	(null)	(null)	(null)	(null)
39.	YD5SCLBLDB	I485							(null)	(null)	(null)	(null)
40.	YUWBI3MKDP	N400					(null)	(null)	(null)	(null)	(null)	(null)

Potential Data Anomalies in the CARRP Dataset^[1]

Applications with No Final Concern Type and No Final Sub-status or Null Sub-Status

Applications Received FY 2013–FY 2019

newid	form_ number	receipt _date	current _status	current_ status_date	cme_1_final _substatus	cme_1_final_ substatus_dt	cme_1_ final_concern	cme_1_final_ concern_dt	cme_2_final _substatus	CME_2_final_ substatus_dt	cme_2_final _concern	CME_2_final _concern_dt
41. ZHS7OY2XVZ	N400								(null)	(null)	(null)	(null)

Source: CARRP Dataset

Note:

[1] "(null)" values represent blank values in the original CARRP Dataset.

Analysis of Changes to Concern Type and Sub-status

Forms I-485 and N-400 Subject to CARRP

By Last Status, using CME 1

Count of CME 1 Changes	Count of Applications					Total Applications	% of Total Applications
	Approved	Denied	Admin Closed	Withdrawn	Pending ^[1]		
<u>Concern Type</u>							
0	1,995	1,328	116	6	2,888	6,333	22.4%
1	14,707	2,489	239	23	2,074	19,532	69.2%
2	942	245	25	4	246	1,462	5.2%
3	418	108	7	0	66	599	2.1%
4	67	18	2	0	12	99	0.4%
5	21	7	1	0	4	33	0.1%
6	6	4	0	0	1	11	0.0%
7	3	0	0	0	0	3	0.0%
8	1	0	0	0	1	2	0.0%
9	0	1	0	0	0	1	0.0%
10	1	0	0	0	0	1	0.0%
Subtotal	18,161	4,200	390	33	5,292	28,076	99.5%
Excluded Applications	0	0	0	0	138	138	0.5%
Total	18,161	4,200	390	33	5,430	28,214	100.0%
<u>Sub-status</u>							
0	1,936	735	63	5	2,228	4,967	17.6%
1	12,870	2,517	226	20	2,270	17,903	63.5%
2	2,411	637	68	7	502	3,625	12.8%
3	675	212	23	1	215	1,126	4.0%
4	177	65	8	0	42	292	1.0%
5	63	18	2	0	21	104	0.4%
6	16	12	0	0	8	36	0.1%
7	8	2	0	0	3	13	0.0%
8	3	0	0	0	2	5	0.0%
9	1	1	0	0	1	3	0.0%
10	1	0	0	0	0	1	0.0%
11	0	1	0	0	0	1	0.0%
Subtotal	18,161	4,200	390	33	5,292	28,076	99.5%
Excluded Applications	0	0	0	0	138	138	0.5%
Total	18,161	4,200	390	33	5,430	28,214	100.0%

Source: CARRP Dataset

Note:

[1] Pending applications includes I-485 and N-400 applications that had pending system statuses on 9/30/19 that did not have lawful permanent resident or United States citizen status for I-485, or United States citizen status for N-400.

Analysis of Changes to Concern Type and Sub-status

Forms I-485 Subject to CARRP

By Last Status, using CME 1

Count of CME 1 Changes	Count of Applications					Total Applications	% of Total Applications
	Approved	Denied	Admin Closed	Withdrawn	Pending ^[1]		
Concern Type							
0	648	512	40	0	1,099	2,299	24.3%
1	4,774	823	51	0	722	6,370	67.3%
2	229	85	5	0	85	404	4.3%
3	161	41	1	0	30	233	2.5%
4	19	6	0	0	6	31	0.3%
5	8	4	1	0	2	15	0.2%
6	4	1	0	0	0	5	0.1%
7	1	0	0	0	0	1	0.0%
8	0	0	0	0	0	0	0.0%
9	0	0	0	0	0	0	0.0%
10	0	0	0	0	0	0	0.0%
Subtotal	5,844	1,472	98	0	1,944	9,358	98.8%
Excluded Applications	0	0	0	0	110	110	1.2%
Total	5,844	1,472	98	0	2,054	9,468	100.0%
Sub-status							
0	724	303	28	0	843	1,898	20.0%
1	4,124	843	49	0	803	5,819	61.5%
2	701	212	14	0	191	1,118	11.8%
3	217	72	6	0	73	368	3.9%
4	46	26	1	0	18	91	1.0%
5	21	9	0	0	8	38	0.4%
6	7	4	0	0	3	14	0.1%
7	3	2	0	0	2	7	0.1%
8	0	0	0	0	2	2	0.0%
9	1	0	0	0	1	2	0.0%
10	0	0	0	0	0	0	0.0%
11	0	1	0	0	0	1	0.0%
Subtotal	5,844	1,472	98	0	1,944	9,358	98.8%
Excluded Applications	0	0	0	0	110	110	1.2%
Total	5,844	1,472	98	0	2,054	9,468	100.0%

Source: CARRP Dataset

Note:

[1] Pending applications includes I-485 applications that had pending system statuses on 9/30/19 that did not have lawful permanent resident or United States citizen status.

Analysis of Changes to Concern Type and Sub-status

Forms N-400 Subject to CARRP

By Last Status, using CME 1

Count of CME 1 Changes	Count of Applications					Total Applications	% of Total Applications
	Approved	Denied	Admin Closed	Withdrawn	Pending ^[1]		
<u>Concern Type</u>							
0	1,347	816	76	6	1,789	4,034	21.5%
1	9,933	1,666	188	23	1,352	13,162	70.2%
2	713	160	20	4	161	1,058	5.6%
3	257	67	6	0	36	366	2.0%
4	48	12	2	0	6	68	0.4%
5	13	3	0	0	2	18	0.1%
6	2	3	0	0	1	6	0.0%
7	2	0	0	0	0	2	0.0%
8	1	0	0	0	1	2	0.0%
9	0	1	0	0	0	1	0.0%
10	1	0	0	0	0	1	0.0%
Subtotal	12,317	2,728	292	33	3,348	18,718	99.9%
Excluded Applications	0	0	0	0	28	28	0.1%
Total	12,317	2,728	292	33	3,376	18,746	100.0%
<u>Sub-status</u>							
0	1,212	432	35	5	1,385	3,069	16.4%
1	8,746	1,674	177	20	1,467	12,084	64.5%
2	1,710	425	54	7	311	2,507	13.4%
3	458	140	17	1	142	758	4.0%
4	131	39	7	0	24	201	1.1%
5	42	9	2	0	13	66	0.4%
6	9	8	0	0	5	22	0.1%
7	5	0	0	0	1	6	0.0%
8	3	0	0	0	0	3	0.0%
9	0	1	0	0	0	1	0.0%
10	1	0	0	0	0	1	0.0%
11	0	0	0	0	0	0	0.0%
Subtotal	12,317	2,728	292	33	3,348	18,718	99.9%
Excluded Applications	0	0	0	0	28	28	0.1%
Total	12,317	2,728	292	33	3,376	18,746	100.0%

Source: CARRP Dataset

Note:

[1] Pending applications includes N-400 applications that had pending system statuses on 9/30/19 that did not have United States citizen status.

Example Application Records in the CARRP Dataset

Application Chronologies with Multiple Concern Type and/or Sub-status Changes

<u>newid</u>	<u>Change #</u>	<u>form_number</u>	<u>receipt_date</u>	<u>current_status</u>	<u>current_status_date</u>	<u>CME_1_Change_Old</u>	<u>CME_1_Change_New</u>	<u>CME_1_Change_Date</u>
Concern Type								
76MR7I7W7F	1	I485						
76MR7I7W7F	2	I485						
76MR7I7W7F	3	I485						
76MR7I7W7F	4	I485						
76MR7I7W7F	5	I485						
0HSGT10AK8	1	N400						
0HSGT10AK8	2	N400						
0HSGT10AK8	3	N400						
0HSGT10AK8	4	N400						
0HSGT10AK8	5	N400						
Sub-status								
PWQCALK4U2	1	N400						
PWQCALK4U2	2	N400						
PWQCALK4U2	3	N400						
PWQCALK4U2	4	N400						
PWQCALK4U2	5	N400						
PWQCALK4U2	6	N400						
PWQCALK4U2	7	N400						
0HSGT10AK8	1	N400						
0HSGT10AK8	2	N400						
0HSGT10AK8	3	N400						

Source: CARRP Dataset