

# EXHIBIT B

~~FILED UNDER SEAL~~

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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

Plaintiffs,

v.

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

Defendants.

CASE NO. 2:17-cv-00094-RAJ

**PLAINTIFFS' SECOND  
SUPPLEMENTAL EXPERT  
DISCLOSURE STATEMENT**

Pursuant to Federal Rules of Civil Procedure 26(e) and Docket 359 (Joint Status Report Pursuant to April 28, 2020 and May 14, 2020 Orders), Plaintiffs further supplement their February 28, 2020 Expert Disclosure Statement in light of amended information disclosed by Defendants. Plaintiffs will further supplement and/or amend this disclosure as appropriate. Should new information become known to Plaintiffs after this date which necessitates further supplementing this disclosure, Plaintiffs reserve the right to serve such supplement(s) consistent with Rules 26(a)(2)(E) and 26(e) of the Federal Rules of Civil Procedure. The absence of any information herein shall not prohibit Plaintiffs from supplementing at a later date, and shall not foreclose Plaintiffs from offering that information in the form of

1 evidence at trial, so long as Plaintiffs properly supplement as allowed under the  
2 Federal Rules of Civil Procedure.

3  
4 **Witness Submitting Supplemental Report**

5 The written report of Sean Kruskol has been revised and supplemented in  
6 light of amended information disclosed by Defendants. *See* Exhibit 1  
7 (Supplemental Expert Report of Sean M. Kruskol).

1 Respectfully submitted,

DATED: July 17, 2020

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**CERTIFICATE OF SERVICE**

1 The undersigned certifies that on July 17, 2020, I caused service of the  
 2 foregoing document via email to all counsel of record herein.  
 3

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DATED: July 17, 2020.

/s/Hugh Handeyside

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# EXHIBIT 1

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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

No. 2:17-cv-00094-RAJ

Plaintiffs,

v.

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

Defendants.

**SUPPLEMENTAL EXPERT REPORT OF SEAN M. KRUSKOL**

I, Sean M. Kruskol, hereby declare:

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

**I. Introduction**

**A. My Assignment**

1. I was engaged by counsel for the Plaintiffs to: 1) review, analyze, and compile summary statistics related to Application to Register Permanent Residence or Adjust Status (“Form I-485”) and Application for Naturalization (“Form N-400”) data provided by U.S. Citizenship and Immigration Services (“USCIS”); and 2) review, merge, and analyze various lists of individuals subject to a current USCIS program called the Controlled Application Review and Resolution Program (“CARRP”).<sup>1</sup> I issued an Expert Report in this matter dated February 28, 2020 (“February Report”). My February Report contained certain opinions pertaining to Forms I-485 and N-400 applications using summary data provided by USCIS (“Original USCIS Data”).<sup>2</sup> Since I issued my February Report, data and information used to form my opinions in

<sup>1</sup> For a more detailed discussion of background information relevant to this Supplemental Report, see my February Report, ¶¶ 11–20.

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

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1 my February Report was updated by USCIS. As a result, I have been asked by Plaintiffs to  
2 review, analyze, and compile summary statistics based on this updated data from USCIS.

3 **B. Purpose of this Supplemental Report**

4  
5 2. On May 15, 2020, subsequent to the issuance of my February Report, USCIS  
6 informed Plaintiffs that USCIS identified an error in the process by which USCIS queried its  
7 databases and compiled the Original USCIS Data.<sup>3</sup> USCIS indicated this error resulted in certain  
8 applications, particularly those completed before June 21, 2017, being inappropriately  
9 categorized as Not-CARRP in the Original USCIS Data.<sup>4</sup> As a result, USCIS indicated it  
10 understated the number of cases subject to CARRP in the Original USCIS Data.<sup>5</sup>

11 3. On June 16, 2020, I received updated data from USCIS that purportedly corrects  
12 errors in the Original USCIS Data identified by USCIS. I reviewed and analyzed the updated  
13 data and updated the calculations and opinions in my February Report. My updated calculations  
14 and opinions are incorporated in this Supplemental Report. In addition, using the updated data  
15 provided by USCIS, I was able to perform additional analyses and reach additional opinions  
16 which are incorporated in this Supplemental Report.

17 4. My findings and opinions are based on my education, training, professional  
18 experience, and the list of documents/information considered and included in Exhibit Y. The  
19 documents I have considered include items such as pleadings, class lists, data from USCIS, a  
20 deposition, and publicly available data and information. I was supported by a team of  
21 professionals at Cornerstone Research working under my direction and supervision.

22 5. The opinions and analyses presented in this Supplemental Report are based on  
23 currently available information. My understanding is that an individual from USCIS will be

24 \_\_\_\_\_  
25 <sup>3</sup> For a detailed description of the Original USCIS Data, see my February Report, ¶¶ 22–25.

26 <sup>4</sup> Plaintiffs informed us that on May 15, 2020, Defendants disclosed errors in the data they originally produced on February 14, 2020, and Defendants provided Plaintiffs with updated spreadsheets on June 12, 2020 and underlying data on June 16, 2020.

<sup>5</sup> Plaintiffs informed us that on May 15, 2020, Defendants disclosed errors in the data they originally produced on February 14, 2020.

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1 deposited regarding topics including: 1) how USCIS identified a purported error in the data I  
2 relied upon for my February Report; 2) the process by which USCIS queried its databases to  
3 correct the purported error it identified; 3) the data definitions for fields contained within  
4 underlying data USCIS produced subsequent to my February Report; and 4) validation  
5 procedures, if any, performed by USCIS to ensure the updated data it produced is complete and  
6 accurate. If new information relating to my analyses or opinions becomes available, I may need  
7 to modify this Supplemental Report.

8 6. I have not testified as an expert at trial or by deposition in any case within the past  
9 four years. My current CV, including publications I authored within the past 10 years, is  
10 included as Exhibit X.

## 11 **II. Summary of Opinions**

12  
13 7. Based on the analyses I performed using USCIS's updated data produced after my  
14 February Report, and that are described herein, I have reached the following updated opinions:

- 15 a. For applications received between October 1, 2012 and September 30, 2019,  
16 applications subject to CARRP were pending as of September 30, 2019 at  
17 approximately one and a half times the rate of applications not subject to CARRP.
- 18 b. For applications received between October 1, 2012 and September 30, 2019,  
19 USCIS denied applications subject to CARRP at two and a half times the rate of  
20 applications not subject to CARRP.
- 21 c. From Fiscal Year 2013 to Fiscal Year 2017, the percentage of Forms I-485  
22 received and subjected to CARRP decreased by approximately 13%.
- 23 d. From Fiscal Year 2014 to Fiscal Year 2019, the largest year-over-year increase in  
24 adjudications by USCIS decision for Forms I-485 subject to CARRP was  
25 approximately 36% and occurred between Fiscal Year 2017 and Fiscal Year  
26 2018.<sup>6</sup>

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<sup>6</sup> See ¶ 25 for a description of adjudication by USCIS decision.

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- 1 e. From Fiscal Year 2013 to Fiscal Year 2017, the percentage of Forms N-400  
2 received and subjected to CARRP increased by approximately 15%.
- 3 f. From Fiscal Year 2014 to Fiscal Year 2019, the largest year-over-year increase in  
4 adjudications by USCIS decision for Forms N-400 subject to CARRP was  
5 approximately 27% and occurred between Fiscal Year 2018 and Fiscal Year 2019.
- 6 g. For applications received between October 1, 2012 and September 30, 2019,  
7 USCIS subjected Forms I-485 from applicants from Muslim-majority countries to  
8 CARRP at over 10 times the rate of those Forms I-485 from applicants from non-  
9 Muslim-majority countries.
- 10 h. For applications received between October 1, 2012 and September 30, 2019,  
11 USCIS subjected Forms N-400 from applicants from Muslim-majority countries  
12 to CARRP at 12 times the rate of those Forms N-400 from applicants from non-  
13 Muslim-majority countries.
- 14 8. Based on the analyses I performed using updated data from USCIS produced after  
15 my February Report, and that are described herein, I have reached the following additional  
16 opinions:
- 17 a. Applications subject to CARRP and adjudicated by USCIS decision were pending  
18 for two and a half times longer than applications not subject to CARRP.
- 19 b. Applications not subject to CARRP and pending more than 180 days are  
20 adjudicated within the same fiscal year at approximately four times the rate of  
21 applications received during the same period and subject to CARRP. It appears  
22 the increase in adjudications by USCIS decision as described in opinions 7(d) and  
23 7(f) is a result of USCIS adjudicating applications received in previous fiscal  
24 years (i.e., backlogged applications), not due to shorter adjudication processing  
25 times.
- 26 c. For applications received in Fiscal Year 2014 and each subsequent year to Fiscal  
Year 2019, the percent of applications subject to CARRP that remained pending  
as of Fiscal Year End 2019 is higher than the percent of Not-CARRP applications  
that remained pending as of Fiscal Year End 2019.
9. Based on the analyses I performed using updated data from USCIS produced after

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1 my February Report, and that are described herein, the following opinions from my February  
2 Report remain unchanged:

- 3 a. From Fiscal Year 2015 to Fiscal Year 2019, the mean processing times for Forms  
4 I-485 and N-400 as produced by USCIS are inconsistent with the mean processing  
5 times for Forms I-485 and N-400 as reported on the USCIS website.
- 6 b. Class Members who submitted Form I-485 and were subject to CARRP have  
7 spent an average of 1,014 days awaiting adjudication.
- 8 c. Class Members who submitted Form N-400 and were subject to CARRP have  
9 spent an average of 727 days awaiting adjudication.
- 10 d. There are discrepancies in the number of Forms I-485 and N-400 pending as of  
11 Fiscal Year Ends 2018 and 2019 when comparing data sources produced by  
12 USCIS.

### 13 **III. Basis for Opinions**

#### 14 **A. My Review and Analysis of Updated Application Data Provided by USCIS**

15 10. As a result of USCIS updating its process by which it queried its databases and  
16 compiled the Original USCIS Data, I received two USCIS datasets for Fiscal Year 2013 through  
17 Fiscal Year 2019. These datasets related to USCIS’s receipt of immigration benefit applications  
18 for naturalization or adjustment of status (collectively, “Updated USCIS Data”). This Updated  
19 USCIS Data also contained information that purported to indicate whether such applications  
20 were subject to CARRP or not subject to CARRP (“Not-CARRP”).

#### 21 **1. Overview of the Updated USCIS Data**

##### 22 **a) Updated Summary Data**

23  
24 11. USCIS provided updated summary data (“Updated USCIS Summary Data”) that  
25 purported to show the counts, from October 1, 2012 through September 30, 2019, of I-485 and  
26 N-400 applications with the following statuses: 1) received by USCIS; 2) adjudicated by

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1 USCIS; 3) approved by USCIS; 4) denied by USCIS; and 5) pending. This data also shows  
2 counts for each application status segmented by whether the application was subject to CARRP  
3 or not subject to CARRP.

4 12. The Updated USCIS Summary Data contains two additional segmentations: 1)  
5 application data by country of birth; and 2) application data by country of citizenship. When  
6 available and applicable, my analyses use application data by country of birth. I used country of  
7 birth because country of birth is not chosen by the applicant, and while applicants may have  
8 more than one country of citizenship, they will only have one country of birth.<sup>7</sup> This is  
9 consistent with my February Report.

10 13. The Updated USCIS Summary Data is similar to the Original USCIS data I used  
11 as the basis for my February Report. However, the Updated USCIS Summary Data corrects a  
12 purported error in the designation of applications as CARRP vs. Not-CARRP discovered by  
13 USCIS after I issued my February Report.

14 14. According to USCIS, it discovered an error in the criteria, or parameters, it used  
15 to designate applications as CARRP or Not-CARRP. Allegedly, this error was corrected by  
16 using criteria within its databases to determine CARRP or Not-CARRP processed applications  
17 via a programmatic query.<sup>8</sup> As a result, USCIS claims it previously produced data that was  
18 under-inclusive of CARRP designated applications. I summarized the differences in annual  
19 applications using the Original USCIS Data and Updated USCIS Summary Data. See Exhibit Z.

20 15. As a result of my analysis, I noted that a total of 13,011 applications were  
21 purportedly misidentified as Not-CARRP according to the Original USCIS Data. I noted at least  
22 82 Form I-485 and 57 Form N-400 applications were identified as CARRP in the Original  
23 USCIS Data but not in the Updated USCIS Summary Data. Based on my understanding of  
24

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25 <sup>7</sup> The Form N-400 instructions state: "If you are a citizen or national of more than one country, type or print the name  
of the foreign country that issued your last passport." See Instructions for Application for Naturalization (USCIS,  
Form N-400), p. 5.

26 <sup>8</sup> My understanding is that USCIS did not validate the Updated USCIS Data by reviewing underlying applications/A-  
Files.

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1 USCIS’s correction of the error it identified, it is unclear why certain applications that were  
2 identified as CARRP in the Original USCIS Data are no longer identified as CARRP in the  
3 Updated USCIS Data. See Exhibit Z.

4 **b) Updated Detailed Data**

5  
6 16. In addition to its updated summary data, USCIS provided a granular dataset  
7 containing 10,621,174 records and 45 fields of application data (“Updated USCIS Detailed  
8 Data”).<sup>9</sup> This granular dataset provides the underlying detail USCIS used to create the Updated  
9 USCIS Summary Data. The Updated USCIS Detailed Data shows anonymized application  
10 details for individuals filing Forms I-485 or N-400 from October 1, 2012 through September 30,  
11 2019.

12 17. The Updated USCIS Detailed Data contains various characteristics for each I-485  
13 or N-400 application received and recorded by USCIS from October 1, 2012 through September  
14 30, 2019. These characteristics include, but are not limited to:

- 15 a. Application Receipt Date (i.e., when an application was received by USCIS);  
16 b. Application Type (i.e., I-485 or N-400);  
17 c. Application Status (e.g., approved, denied, pending, revoked, DOS revoked,  
18 admin closed, and withdrawn);  
19 d. CME Date (i.e., date a National Security Concern (“NS Concern”) case was  
20 opened or completed); and  
21 e. Last Application Status Date (i.e., the date of most recent Application Status  
22 change).<sup>10</sup>

23 18. Using the Updated USCIS Detailed Data, I was able to replicate results presented  
24 in the USCIS Summary Data. One of the replications I performed related to USCIS’s

25 \_\_\_\_\_  
26 <sup>9</sup> I was not provided detailed application data in connection with the Original USCIS Data used in my February Report.

<sup>10</sup> See USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv. See also, data\_dictionary – Subject to Attorneys’ Eyes Only Protective Order.xlsb.

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1 identification of applications as CARRP vs. Not-CARRP. I replicated USCIS's identification of  
2 applications processed under CARRP as those with an:

- 3 a. NS Concern case opened and completed between Application Receipt Date and  
4 Last Application Status Date (i.e., adjudication);
- 5 b. NS Concern case opened before Application Receipt Date and completed before  
6 Last Application Status Date;
- 7 c. NS Concern case opened after Application Receipt Date and completed after Last  
8 Application Status Date;
- 9 d. NS Concern case opened before Application Receipt Date and completed after  
10 Last Application Status Date; or
- 11 e. NS Concern case opened before Last Application Status Date but not completed.

12 19. I replicated applications identified as Not-CARRP as those:

- 13 a. without an NS Concern case;
- 14 b. with an NS Concern case opened and completed before Application Receipt Date;
- 15 c. with an NS Concern case opened and completed after Last Application Status  
16 Date; or
- 17 d. with an NS Concern case opened after Last Application Status Date but not  
18 completed.

19 20. Based on the information I have received to date, it is unclear how the NS  
20 Concern designation for an application relates to the designation of CARRP vs. Not-CARRP.  
21 For example, it is unclear why an application was identified as CARRP if: 1) an application with  
22 an NS Concern case was opened but not completed; or 2) an NS Concern case was completed  
23 after Last Application Status Date. See Exhibit AA.

24 21. It is my understanding that USCIS has not provided all underlying copies of  
25 completed applications. Accordingly, I have been unable to perform validation procedures, such  
26 as completeness or accuracy checks, on the Updated USCIS Data.

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## 2. My Calculation of General Application Summary Statistics

22. The Updated USCIS Summary Data shows that USCIS received 10,621,174 Forms I-485 and N-400 from October 1, 2012 through September 30, 2019 (“Aggregate Applications”). Of the 10,621,174 Aggregate Applications, the Updated USCIS Summary Data shows that 28,214, or 0.3%, were subject to CARRP. USCIS processed 10,592,960, or 99.7% of the Aggregate Applications as Not-CARRP. See Exhibit AB.

23. The Updated USCIS Summary Data subsets the total receipt counts by applications that were adjudicated. According to the Updated USCIS Summary Data, 9,100,391, or 85.7%, of the Aggregate Applications were adjudicated between October 1, 2012 and September 30, 2019. The difference between the adjudicated applications and Aggregate Applications is 1,520,783 applications. Of those 1,520,783 applications, the Updated USCIS Summary Data indicates that 1,390,836 were pending as of September 30, 2019. The remaining 61,903 applications were excluded from my analyses as these applications include unexplained data anomalies such as: 1) adjudicated or pending applications with a Last Application Status Date prior to the Application Receipt Date; 2) adjudicated or pending applications with a Last Application Status Date equal to the Application Receipt Date; or 3) pending applications that had lawful permanent resident or United States citizen status for I-485, or United States citizen status for N-400 applications.<sup>11</sup> See Exhibit AB.

24. I analyzed pending applications based on USCIS’s designation of CARRP or Not-CARRP processing status. Of the 1,390,836 applications pending as of September 30, 2019, the Updated USCIS Summary Data shows that 5,292 applications were subject to CARRP and 1,385,544 were not subject to CARRP. Based on my analysis, I determined that applications subject to CARRP and pending as of September 30, 2019 total 18.8% of the total applications

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<sup>11</sup> For an example of each type of excluded application, see USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv at: 1) “newid 02FXYLTLÉH” which has a receipt date of 1/8/16 and a current status date of 6/25/15; 2) “newid 3BW6CMGV5T” which has a receipt date and current status date of 2/6/19; and 3) “newid 008S5FO8ET” corresponding to a pending I-485 application that has a CIS status of “USC.”

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1 subject to CARRP between October 1, 2012 and September 30, 2019. The total applications  
2 pending as of September 30, 2019 and not subject to CARRP total 13.1% of the total  
3 applications not subject to CARRP between October 1, 2012 and September 30, 2019. This  
4 means that applications received from Fiscal Year 2013 through Fiscal Year 2019 and subject to  
5 CARRP were pending as of September 30, 2019 at approximately one and a half times the rate of  
6 applications received during the same period and not subject to CARRP. See Exhibit AB. Using  
7 the Updated USCIS Detailed Data, I was able to further analyze pending applications by receipt  
8 date and fiscal year. See ¶ 68.

9 25. Using the Updated USCIS Detailed Data, I was able to subset adjudicated  
10 applications into two categories: 1) Adjudicated by USCIS Decision; and 2) Adjudicated by  
11 Applicant Action. Adjudicated by USCIS Decision applications result from USCIS: 1)  
12 approving; 2) denying; or 3) revoking applications.<sup>12</sup> Adjudicated by Applicant Action result  
13 from an applicant: 1) not appearing for their interview with USCIS (i.e., “Admin Closed”); or 2)  
14 withdrawing their application (i.e., “Withdrawn”).<sup>13</sup> For my analyses of adjudicated  
15 applications, I excluded applications deemed Adjudicated by Applicant Action as USCIS did not  
16 have control over the most recent status of these applications as reported in the Updated USCIS  
17 Detailed Data.

18 26. I analyzed the adjudicated applications based on USCIS’s designation of CARRP  
19 or Not-CARRP processing status. Based on my analysis, I determined that USCIS adjudicated  
20 22,361, or 79.3% of the total applications subject to CARRP and 9,078,030, or 85.7% of the total  
21 applications not subject to CARRP. Using the Updated USCIS Detailed Data, I was able to  
22 further analyze the adjudicated applications by receipt date and fiscal year. See ¶¶ 65–67.

23 27. Of the 9,100,391 adjudicated applications, the Updated USCIS Summary Data  
24

25  
26 <sup>12</sup> Revoked applications appear with an Application Status of either “Revoked” or [REDACTED]. I included the seven [REDACTED] applications in the Adjudicated by USCIS Decision category as this was a third-party decision and not an Adjudication by Applicant Action.

<sup>13</sup> USCIS Policy Manual, Volume 12, Chapter 4—Results of the Naturalization Examination, current as of 2/24/20.

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1 shows that 8,413,329 of the Aggregate Applications were approved and 686,643 of the  
2 Aggregate Applications were denied between October 1, 2012 and September 30, 2019. The  
3 difference between: 1) the total approved and denied applications of 9,099,972; and 2) the  
4 9,100,391 adjudicated applications is 419 applications. These 419 applications have a status of  
5 Revoked or DOS Revoked. See Exhibits AB and AC.

6 28. I subset the total applications (both I-485 and N-400) that were either approved or  
7 denied from October 1, 2012 through September 30, 2019 into two categories: 1) CARRP; and  
8 2) Not-CARRP. Then, I analyzed the proportion of denials to approvals and denials in each  
9 category. Based on my analysis, I determined that, of the CARRP applications that were either  
10 approved or denied, denials accounted for 18.8%. Of the Not-CARRP applications that were  
11 either approved or denied, denials accounted for 7.5%. As a result, USCIS denied applications  
12 subject to CARRP at two and a half times the rate it denied applications not subject to CARRP.  
13 See Exhibit AC.

14 29. I performed similar analyses by application type. The results of these analyses are  
15 described below.

16 **a) Form I-485**

17 **(1) General summary statistics**

18  
19 30. The results for Forms I-485 are similar to the results for the Aggregate  
20 Applications. The USCIS Summary Data shows I-485 application receipts of 4,646,062 from  
21 October 1, 2012 through September 30, 2019. Of these, 9,468 were processed under CARRP  
22 and 4,636,594 were processed as Not-CARRP. See Exhibit AD.

23 31. According to the USCIS Summary Data, USCIS adjudicated 3,824,829 of the  
24 total I-485 applications it received from October 1, 2012 to September 30, 2019. Of the  
25 3,824,829 adjudicated I-485 applications, 7,316 were processed under CARRP and 3,817,513  
26 were not processed under CARRP. I analyzed the adjudicated applications processed under

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1 CARRP compared to those not processed under CARRP. USCIS processed 9,468 applications  
2 under CARRP and adjudicated 7,316, or 77.3% of these applications. USCIS processed  
3 4,636,594 applications not under CARRP and adjudicated 3,817,513, or 82.3% of these  
4 applications. Using the Updated USCIS Detailed Data, I was able to further analyze the  
5 adjudicated applications by receipt date and fiscal year. See ¶¶ 65–67.

6 32. Of the 757,620 Forms I-485 pending as of September 30, 2019, the USCIS  
7 Summary Data shows 1,944 were subject to CARRP and 755,676 were not subject to CARRP.  
8 Based on my analysis, I determined that 20.5% of total I-485 applications subject to CARRP  
9 remained pending as of September 30, 2019. I also determined that 16.3% of the I-485  
10 applications not subject to CARRP remained pending as of September 30, 2019. This means that  
11 I-485 applications received during Fiscal Year 2013 through Fiscal Year 2019 and subject to  
12 CARRP were pending as of September 30, 2019 at approximately one and a quarter of the rate of  
13 applications not subject to CARRP. See Exhibit AD. Using the Updated USCIS Detailed Data,  
14 I was able to further analyze the pending applications by receipt date and fiscal year. See ¶ 68.

15 33. I subset the total I-485 applications that were either approved or denied from  
16 October 1, 2012 through September 30, 2019 into two categories: 1) CARRP; and 2) Not-  
17 CARRP. Then, I analyzed the proportion of denials to approvals and denials in each category.  
18 Based on my analysis, I determined that of the CARRP applications that were either approved or  
19 denied, denials accounted for 20.1%. Of the Not-CARRP applications that were either approved  
20 or denied, denials accounted for 6.7%. As a result, USCIS denied I-485 applications subject to  
21 CARRP at three times the rate it denied applications not subject to CARRP. See Exhibit AE.

## 22 (2) Fiscal Year trend analyses

23  
24 34. I analyzed the number of Forms I-485 subject to CARRP as a percentage of total  
25 Forms I-485 received for each fiscal year provided by USCIS. As a result of my analysis, I am  
26 able to conclude that the percent of Forms I-485 subject to CARRP decreased from 0.23% in

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1 Fiscal Year 2013 to 0.20% in Fiscal Year 2017. This represents an approximately 13% decrease  
2 over a five-year period. Fiscal Year 2015 represents the high-water mark for the percentage of  
3 received Forms I-485 subject to CARRP. From Fiscal Year 2017 to Fiscal Year 2019, the  
4 percent of Forms I-485 subject to CARRP decreased each year from 0.20% in Fiscal Year 2017  
5 to 0.09% in Fiscal Year 2019. This represents an approximately 50% decrease in the percent of  
6 received Forms I-485 subjected to CARRP in the most recent three-year period. See Exhibit AF.

7 35. From Fiscal Year 2014 to Fiscal Year 2019, I analyzed the year-over-year change  
8 in Form I-485 adjudications for CARRP and Not-CARRP designated applications. As a result of  
9 my analysis, I am able to conclude that the largest year-over-year increase in adjudications for  
10 Forms I-485 subject to CARRP was between Fiscal Year 2017 and Fiscal Year 2018. Between  
11 these two years, the number of adjudications for Form I-485 subject to CARRP increased from  
12 1,135 in Fiscal Year 2017 to 1,544 in Fiscal Year 2018. This represents an approximately 36%  
13 year-over-year increase. This increase in adjudicated applications appears to be consistent with  
14 the testimony of Daniel Renaud, Associate Director of Field Operations for USCIS, who stated  
15 that adjudications for CARRP designated applications increased after the complaint was filed in  
16 this matter.<sup>14</sup> See Exhibit AG.

17 **b) Form N-400**

18 **(1) General summary statistics**

19  
20 36. The results for Forms N-400 are similar to the results for the Aggregate  
21 Applications. The Updated USCIS Summary Data shows N-400 application receipts of  
22 5,975,112 for October 1, 2012 through September 30, 2019. Of these, 18,746 were processed  
23 under CARRP and 5,956,366 were processed as Not-CARRP. See Exhibit AH.

24 37. According to the Updated USCIS Summary Data, USCIS adjudicated 5,275,562  
25

26  

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<sup>14</sup> Deposition of Daniel Renaud, 1/10/20 (“Renaud Deposition”), pp. 122–126. See also, my February Report, ¶ 38.

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1 of the total N-400 applications it received from October 1, 2012 to September 30, 2019. Of the  
2 5,275,562 adjudicated N-400 applications, 15,045 were processed under CARRP and 5,260,517  
3 were not processed under CARRP. I analyzed the adjudicated applications processed under  
4 CARRP compared to those not processed under CARRP. USCIS processed 18,746 applications  
5 under CARRP and adjudicated 15,045, or 80.3% of CARRP processed applications. USCIS  
6 processed 5,956,366 applications not under CARRP and adjudicated 5,260,517, or 88.3% of  
7 these applications. Using the Updated USCIS Detailed Data, I was able to further analyze  
8 adjudicated applications by receipt date and fiscal year. See ¶¶ 65–67.

9 38. Of the 633,216 Forms N-400 pending as of September 30, 2019, the Updated  
10 USCIS Summary Data shows 3,348 were subject to CARRP and 629,868 were not subject to  
11 CARRP. Based on my analysis, I determined that 17.9% of the total N-400 applications subject  
12 to CARRP remained pending as of September 30, 2019. I also determined that 10.6% of the N-  
13 400 applications not subject to CARRP remained pending as of September 30, 2019. This means  
14 that N-400 applications received during Fiscal Year 2013 through Fiscal Year 2019 and subject  
15 to CARRP were pending as of September 30, 2019 at approximately one and three quarters times  
16 the rate of applications not subject to CARRP. See Exhibit AH. Using the Updated USCIS  
17 Detailed Data, I was able to further analyze the pending applications by receipt date and fiscal  
18 year. See ¶ 68.

19 39. I subset the total N-400 applications that were either approved or denied from  
20 October 1, 2012 through September 30, 2019 into two categories: 1) CARRP; and 2) Not-  
21 CARRP. Then, I analyzed the proportion of denials to approvals and denials in each category.  
22 Based on my analysis, I determined that of the CARRP applications that were either approved or  
23 denied, denials accounted for 18.1%. Of the Not-CARRP applications that were either approved  
24 or denied, denials accounted for 8.1%. As a result, USCIS denied N-400 applications subject to  
25 CARRP at approximately two and a quarter times the rate it denied applications not subject to  
26 CARRP. See Exhibit AI.

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**(2) Fiscal Year trend analyses**

1  
2 40. I analyzed the number of Forms N-400 subject to CARRP as a percentage of total  
3 Forms N-400 received for each fiscal year provided by USCIS. As a result of my analysis, I am  
4 able to conclude that the percent of Forms N-400 subject to CARRP increased from 0.26% in  
5 Fiscal Year 2013 to 0.30% in Fiscal Year 2017. This represents an approximately 15% increase  
6 in the percent of received Forms N-400 subjected to CARRP over a five-year period. Fiscal  
7 Year 2015 represents the high-water mark for the percentage of received Forms N-400 subject to  
8 CARRP. From Fiscal Year 2017 to Fiscal Year 2019, the percent of Forms N-400 subject to  
9 CARRP decreased each year from 0.30% in Fiscal Year 2017 to 0.14% in Fiscal Year 2019.  
10 This represents an approximately 50% decrease in the percentage of received Forms N-400  
11 subjected to CARRP in the most recent three-year period. See Exhibit AJ.

12 41. From Fiscal Year 2014 to Fiscal Year 2019, I analyzed the year-over-year change  
13 in Form N-400 adjudications for CARRP and Not-CARRP designated applications. As a result  
14 of my analysis, I am able to conclude that the largest year-over-year increase in adjudications for  
15 Forms N-400 subject to CARRP was between Fiscal Year 2018 and Fiscal Year 2019. Between  
16 these two years, the number of adjudications for Forms N-400 subject to CARRP increased from  
17 2,966 in Fiscal Year 2018 to 3,762 in Fiscal Year 2019. This represents an approximately 27%  
18 year-over-year increase in the number of adjudications for Forms N-400 subject to CARRP.  
19 This increase in adjudicated applications appears to be consistent with the testimony of Mr.  
20 Renaud, who stated that adjudications for CARRP designated applications increased after the  
21 complaint was filed in this matter.<sup>15</sup> See Exhibit AK.

**3. My Calculation of CARRP and Not-CARRP Processed Applications  
for Muslim-Majority Countries**

22  
23  
24  
25 42. Using the Updated USCIS Detailed Data I was able to analyze applications that  
26

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<sup>15</sup> Renaud Deposition, pp. 122–126. See also, my February Report, ¶ 44.

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1 were subject to CARRP and not subject to CARRP for Muslim-majority countries and non-  
2 Muslim-majority countries from October 1, 2012 through September 30, 2019. To determine  
3 whether a given country included in the Updated USCIS Detailed Data should be designated as  
4 Muslim-majority, I used the same method as discussed in my February Report, which included:  
5 1) cleaning the Updated USCIS Detailed Data to develop a unique list of countries; and 2)  
6 identifying Muslim-majority countries by reviewing public sources of religion data.<sup>16</sup>

7 43. After cleaning the Updated USCIS Detailed Data and identifying Muslim-  
8 majority countries in USCIS's list of countries of birth, I used the Updated USCIS Detailed Data  
9 to summarize and analyze the counts of applications that were: 1) subject to CARRP; and 2)  
10 identified as being submitted by applicants from Muslim-majority countries or non-Muslim-  
11 majority countries. The results of my analyses are below.

12 **a) Form I-485**

13  
14 44. Based on my analysis, I determined that USCIS subjected Forms I-485 from  
15 applicants from Muslim-majority countries to CARRP at a higher rate than Forms I-485 from  
16 applicants from non-Muslim-majority countries. This finding is true on an absolute and relative  
17 basis. From October 1, 2012 through September 30, 2019, USCIS received 4,646,062 Forms I-  
18 485. On an absolute basis, 5,743 of these applications were subject to CARRP and from  
19 applicants from Muslim-majority countries, and 3,725 were subject to CARRP and from  
20 applicants from non-Muslim-majority countries. This means that Form I-485 applicants  
21 subjected to CARRP from Muslim-majority countries were approximately one and a half times  
22 the number of applicants subjected to CARRP from non-Muslim-majority countries. See Exhibit  
23 AL.

24 45. On a relative basis, USCIS subjected 0.97% of Forms I-485 from applicants from  
25 Muslim-majority countries to CARRP, and subjected 0.09% of Forms I-485 from applicants

26 \_\_\_\_\_  
<sup>16</sup> See my February Report, ¶¶ 45–47.

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1 from non-Muslim-majority countries to CARRP. This means that Forms I-485 from applicants  
2 from Muslim-majority countries were subjected to CARRP at over 10 times the rate of those  
3 Forms I-485 from applicants from non-Muslim-majority countries. This is consistent with each  
4 individual period I analyzed. See Exhibit AL.

5 46. For example, in Fiscal Year 2016, USCIS received 710,852 Forms I-485. Of  
6 these 710,852 applications, 88,286 were from Muslim-majority countries and 622,566 were from  
7 non-Muslim-majority countries. See Exhibit AM. On an absolute basis, USCIS subjected 1,184  
8 Forms I-485 from applicants from Muslim-majority countries to CARRP and subjected 606  
9 Forms I-485 from applicants from non-Muslim majority countries to CARRP. This is  
10 approximately double the number of applicants subjected to CARRP from Muslim-majority  
11 countries than from non-Muslim-majority countries. See Exhibit AL.

12 47. On a relative basis, in Fiscal Year 2016 USCIS subjected 1.34% of Forms I-485  
13 from applicants from Muslim-majority countries to CARRP, and subjected 0.10% of Forms I-  
14 485 from applicants from non-Muslim-majority countries to CARRP. This means that Forms I-  
15 485 from applicants from Muslim-majority countries were subjected to CARRP at over 13 times  
16 the rate of those Forms I-485 from applicants from non-Muslim-majority countries.

17 48. These results are similar for Fiscal Year 2013 through Fiscal Year 2019. See  
18 Exhibit AL.

19 **b) Form N-400**

20  
21 49. Based on my analysis, I determined that USCIS subjected Forms N-400 from  
22 applicants from Muslim-majority countries to CARRP at a higher rate than Forms N-400 from  
23 applicants from non-Muslim-majority countries. This finding is true on an absolute and relative  
24 basis. From October 1, 2012 through September 30, 2019, USCIS received 5,975,112 Forms N-  
25 400. On an absolute basis, 12,797 of these applications were subject to CARRP and from  
26 applicants from Muslim-majority countries, and 5,949 were subject to CARRP and from

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1 applicants from non-Muslim-majority countries. This means that Form N-400 applicants  
2 subjected to CARRP from Muslim-majority countries were more than twice the number of  
3 applicants subjected to CARRP from non-Muslim-majority countries. See Exhibit AN.

4 50. On a relative basis, USCIS subjected 1.46% of Forms N-400 from applicants from  
5 Muslim-majority countries to CARRP, and subjected 0.12% of Forms N-400 from applicants  
6 from non-Muslim-majority countries to CARRP. This means that Forms N-400 from applicants  
7 from Muslim-majority countries were subjected to CARRP at over 12 times the rate of those  
8 Forms N-400 from applicants from non-Muslim-majority countries. This is consistent with each  
9 individual period I reviewed. See Exhibit AN.

10 51. For example, in Fiscal Year 2015, USCIS received 785,966 Forms N-400. Of the  
11 785,966 N-400 applications, 125,061 were from Muslim-majority countries and 660,905 were  
12 from non-Muslim-majority countries. See Exhibit AO. On an absolute basis, USCIS subjected  
13 2,727 Forms N-400 from applicants from Muslim-majority countries to CARRP and subjected  
14 1,144 Forms N-400 from applicants from non-Muslim majority countries to CARRP. This is  
15 approximately two and a half times the number of applicants subjected to CARRP from Muslim-  
16 majority countries than from non-Muslim-majority countries. See Exhibit AN.

17 52. On a relative basis, in Fiscal Year 2015 USCIS subjected 2.18% of Forms N-400  
18 from applicants from Muslim-majority countries to CARRP, and subjected 0.17% of Forms N-  
19 400 from applicants from non-Muslim-majority countries to CARRP. This means that Forms N-  
20 400 from applicants from Muslim-majority countries were subjected to CARRP at approximately  
21 13 times the rate of those Forms N-400 from applicants from non-Muslim-majority countries.

22 53. These results are similar for Fiscal Year 2013 through Fiscal Year 2019. See  
23 Exhibit AN.

#### 24 **4. My Comparison of the USCIS Data to Publicly Available Statistics**

25  
26 54. Using the Updated USCIS Detailed Data, I calculated mean and median

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1 processing times for applications received in a given fiscal year. Overall, my conclusions related  
2 to mean and median processing times by application status and fiscal year using the Updated  
3 USCIS Detail Data and publicly available information have not changed from my February  
4 Report.

5 55. As part of my analysis of the Updated USCIS Detailed Data, I compared the mean  
6 processing times presented in the Updated USCIS Detailed Data to those published by USCIS on  
7 its website.<sup>17</sup> I did this analysis for Forms I-485 and N-400.<sup>18</sup> Based on my analysis, the mean  
8 processing times that I calculated for each fiscal year using the Updated USCIS Detailed data  
9 differ from the mean processing times for each fiscal year presented on USCIS's website.<sup>19</sup>

10 56. For example, in Fiscal Year 2017 I calculated a mean processing time of 359 days  
11 for Form I-485 using the Updated USCIS Detail Data. The USCIS website shows a mean  
12 processing time of 8.4 months, or approximately 256 days.<sup>20</sup> This is 29% lower than the mean I  
13 calculated from the Updated USCIS Detail Data. The Updated USCIS Detailed Data shows  
14 longer mean processing times than the USCIS website for Form I-485 in each fiscal year  
15 presented on the USCIS website besides Fiscal Year 2018. It is unclear why the mean  
16 processing times I calculated from the Updated USCIS Detail Data are inconsistent with the  
17 publicly available mean processing times provided on its website for Form I-485. See Exhibit  
18 AP.

19 57. The mean processing times I calculated using the Updated USCIS Detailed Data  
20 are also inconsistent with the mean processing times provided on the USCIS website for Form  
21

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22 <sup>17</sup> See Historical National Average Processing Time for All USCIS Offices, available at  
<https://egov.uscis.gov/processing-times/historic-pt>, accessed on 2/22/20 and 7/15/20.

23 <sup>18</sup> To calculate mean processing times for each fiscal year from the Updated USCIS Detailed Data, I determined the  
24 average number of days between the receipt date and current status date for applications received by USCIS in each  
25 fiscal year. The USCIS website reports multiple mean processing times for Form I-485, segmented by the  
26 "Classification or Basis for Filing." I have used the longest of these mean processing times for my analysis. See  
Exhibits AP and AQ for further detail.

<sup>19</sup> Based on the Updated USCIS Detailed Data, which contains a maximum Last Application Status of 9/30/19, I was  
not provided data sufficient to replicate the Fiscal Year 2019 mean processing times per the USCIS website, which  
appears to be updated through March 31, 2020.

<sup>20</sup> 8.4 months represents the maximum of the mean processing times for Fiscal Year 2017 for all classifications of  
Form I-485. I have converted months to days using a factor of 365/12. See Exhibit AP for further detail.

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1 N-400. For Form N-400, the Updated USCIS Detailed Data shows mean processing times  
2 longer than the mean processing times provided on the USCIS website besides Fiscal Year 2018.  
3 It is unclear why the mean processing times produced by USCIS are inconsistent with the  
4 publicly available mean processing times provided on its website for Form N-400. See Exhibit  
5 AQ.

## 6 **5. My Review and Analysis of the Class Lists**

7  
8 58. USCIS has not provided any additional or updated Class Lists subsequent to the  
9 issuance of my February Report. Therefore, my calculations and conclusions related to the Class  
10 Lists have not changed from my February Report. See Exhibits AR, AS, AT, and AU.

11 59. In my February Report, I noted certain discrepancies between the Class Lists and  
12 Original USCIS Data.<sup>21</sup> I attempted to use attributes from the Class Lists to identify Class  
13 Members in the Updated USCIS Detailed Data and reconcile these discrepancies. I was unable  
14 to identify Class Members in the Updated USCIS Detailed Data as the Updated USCIS Detailed  
15 Data uses an anonymized identifier for each applicant. However, based on my review of the  
16 Class Lists and Updated USCIS Detailed Data, I noted certain Class Members who do not appear  
17 in the Updated USCIS Detailed Data based on common attributes found in the Class Lists and  
18 the Updated USCIS Detailed Data (e.g., Application Type, Application Receipt Date). For  
19 example, the 12/31/18 and 3/31/19 class lists each contain a record associated with an Alien  
20 number ending in -768, having a receipt date of [REDACTED] for Form I-485. This combination of  
21 receipt date and form type does not exist for a CARRP identified application in the Updated  
22 USCIS Detailed Data. It is unclear why this discrepancy exists between the Class Lists and the  
23 Updated USCIS Detailed Data.

24  
25  
26  

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<sup>21</sup> See my February Report, ¶¶ 71–73.

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1           **6. My Analysis of Lag Times from Application Receipt to Adjudication**  
2           **by USCIS Decision**

3                   **a) Mean and Median Lag Times for CARRP and Not-CARRP**  
4                   **Applications**

5           60. The Updated USCIS Detailed Data indicates 22,361 Forms I-485 or N-400 that  
6 were subject to CARRP and Adjudicated by USCIS Decision. I calculated the mean, or average,  
7 number of days an application remained pending from the application receipt date to the date of  
8 Adjudication by USCIS Decision. This mean is 617 days. This indicates that an applicant who  
9 submitted a Form I-485 or N-400 and was subject to CARRP awaited adjudication by USCIS  
10 Decision, on average, 617 days. This is approximately 1.7 years. I determined this figure by  
11 calculating the number of days between the application receipt date and last status date for each  
12 application processed under CARRP. For example, the Updated USCIS Detailed Data contains a  
13 record associated with “newid VBI9M3LOCM” having a receipt date of [REDACTED] for Form N-400  
14 and adjudication by USCIS Decision date of [REDACTED]. Thus, the applicant associated with “newid  
15 VBI9M3LOCM” spent 1,788 days awaiting adjudication by USCIS Decision.

16           61. In addition, I calculated the median, or middle value, number of days pending as  
17 574 days. This indicates that half of the applicants who submitted a Form I-485 or N-400 and  
18 were processed under CARRP spent over 574 days awaiting adjudication by Adjudication by  
19 USCIS Decision.

20           62. The Updated USCIS Detailed Data contained 9,078,030 Forms I-485 or N-400  
21 that were Not-CARRP and Adjudicated by USCIS Decision. I calculated the mean, or average,  
22 number of days an application remained pending from the application receipt date to the date of  
23 Adjudication by USCIS Decision. This mean is 244 days. This indicates that an applicant who  
24 submitted a Form I-485 or N-400 and was not subject to CARRP awaited adjudication by USCIS  
25 Decision, on average, 244 days. This is approximately 0.7 years. This means that applications  
26 Adjudicated by USCIS Decision and subject to CARRP were pending for two and a half times

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1 longer than applications not subject to CARRP.

2 63. In addition, I calculated the median, or middle value, number of days pending as  
3 200 days. This indicates that half of the applicants who submitted a Form I-485 or N-400 and  
4 were not subject to CARRP spent over 200 days awaiting adjudication by Adjudication by  
5 USCIS Decision. See Exhibit AV.

6 **b) Mean and Median Lag Times for CARRP and Not-CARRP**  
7 **Applications**

8  
9 64. Using the Updated USCIS Detailed Data, I was able to calculate the lag time  
10 between the date an application was received and the date of adjudication for those Form I-485  
11 and N-400 applications received by USCIS between October 1, 2012 and September 30, 2019  
12 and categorized as Adjudicated by USCIS Decision. I then analyzed the lag time for only those  
13 applications that were adjudicated more than 180 days after receipt.<sup>22</sup> For applications that were  
14 adjudicated more than 180 days after receipt, I calculated the number of applications where the  
15 adjudication was in a different fiscal year than the application receipt date. For example, an  
16 application associated with “newid 0032V7XJ2V” was received on [REDACTED] and approved on  
17 [REDACTED]. This crosses one fiscal year (Fiscal Year 2017) and was adjudicated more than 180  
18 days after receipt.

19 65. Based on my analysis, 1,129 of 21,447, or 5.3%, Forms I-458 and N-400  
20 processed under CARRP that were pending for more than 180 days were adjudicated within the  
21 same fiscal year as receipt. For Not-CARRP processed applications pending for more than 180  
22 days, 1,227,177 of 5,148,213, or 23.8% were adjudicated with the same fiscal year. This means  
23 that applications not subject to CARRP and pending more than 180 days are adjudicated within  
24  
25

26 <sup>22</sup> U.S. Code establishes that immigration benefit applications “should be completed not later than 180 days after the initial filing of the application.” See my February Report, ¶ 17 and FN 16.

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1 the same fiscal year at approximately four times the rate of applications received during the same  
2 period and subject to CARRP. See Exhibit AY.

3 66. For applications subject to CARRP and adjudicated more than 180 days after  
4 receipt, 47.0% were adjudicated within one fiscal year after being received; 83.9% were  
5 adjudicated within two fiscal years; and 95.4% within three fiscal years. For applications not  
6 subject to CARRP and adjudicated more than 180 days after receipt, 90.5% were adjudicated  
7 within one fiscal year after being received; 98.3% within two fiscal years; and 99.4% within  
8 three fiscal years. See Exhibit AY.

9 67. I performed this analysis by fiscal year. Based on my analysis, it appears the  
10 increase in Adjudications by USCIS Decision as described in ¶¶ 35 and 41 is a result of USCIS  
11 adjudicating applications received in previous fiscal years (i.e., backlogged applications), not due  
12 to shorter adjudication processing times. See Exhibit AY. These results are similar for each  
13 individual form. See Exhibits AZ and BA.

#### 14 7. My Analysis of Applications Pending as of Fiscal Year End 2019

15  
16 68. Using the Updated USCIS Detailed Data, I calculated the number of Form I-485  
17 and N-400 applications received in each fiscal year, and, of those, how many applications  
18 remained pending as of September 30, 2019. For applications received in Fiscal Year 2014 and  
19 each subsequent year to Fiscal Year 2019, the percent of applications subject to CARRP that  
20 remained pending as of Fiscal Year End 2019 is higher than the percent of Not-CARRP  
21 applications that remained pending as of Fiscal Year End 2019. For example, for applications  
22 received in Fiscal Year 2018, 48.3% of CARRP applications remained pending as of Fiscal Year  
23 End 2019 and 12.4% of Not-CARRP applications remained pending as of Fiscal Year End 2019.  
24 See Exhibit BB. These results are similar for each individual form. See Exhibits BC and BD.  
25  
26

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1           69. I declare under penalty of perjury that the foregoing is true and correct. Executed  
2 this 17th day of July 2020 in Chicago, IL.

3  
4 *Sean Kruskol*

5 \_\_\_\_\_  
6 SEAN M. KRUSKOL  
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**EXHIBIT X****Sean M. Kruskol, CPA/CGMA, CFE  
Principal**

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**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 professional services, manufacturing, pharmaceutical, banking, real estate, healthcare, 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	<b>Miami University (Ohio)</b> <i>M.Acc., Accounting</i>	Oxford, Ohio
2003–2007	<b>Miami University (Ohio)</b> <i>B.S., Accounting</i>	Oxford, Ohio

**PROFESSIONAL EXPERIENCE**

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

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

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**REPRESENTATIVE CONSULTING MATTERS**

*Breach of Contract Disputes*

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.

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

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.

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

Calculated pre-judgment interest on potential damages related to a breach of contract matter.

*Accounting and Auditing*

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

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.

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.

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.

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

Recalculated interest amounts on various post-acquisition dispute matters.

*Data Analytics*

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 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.

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

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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.

#### *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.

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

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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 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.

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**

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**CERTIFICATIONS**

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

Chartered Global Management Accountant (CGMA)

Certified Fraud Examiner (CFE)

**SPEAKING ENGAGEMENTS**

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**

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

**PROGRAMMING LANGUAGES USED IN LITIGATION MATTERS**

SQL, SAS, R, and VBA

**OTHER PROGRAMMING LANGUAGES**

Java and COBOL

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

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**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
Illinois Legal Aid Online YPB, Executive Committee Member	2013–2016

**AWARDS AND RECOGNITION**

Illinois CPA Society Distinguished Service Award	2018–2019
Illinois CPA Society, <i>Insight Magazine</i> , IN Play: Q&A	Winter 2019

## Exhibit Y

# Documents Considered

Additional documents considered since my February 28, 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

### Depositions

Deposition Testimony and Exhibits 54–67 of Daniel Renaud, 1/10/20

### Expert Reports

**Expert Report and Exhibits of Bernard R. Siskin, 2/28/20**

### 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).xlsx)  
Class List as of 3/31/19 (Class List (as of March 31, 2019) (Confidential - Attorney Eyes Only).xlsx)  
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**  
**data\_dictionary – Subject to Attorneys' Eyes Only Protective Order.xlsxb**

## Exhibit Y

# Documents Considered

Additional documents considered since my February 28, 2020 report are in **bold**.

### 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](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>

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>

## Exhibit Y

# Documents Considered

Additional documents considered since my February 28, 2020 report are in **bold**.

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&region\\_name=All%20Countries&restrictions\\_year=2016](http://www.globalreligiousfutures.org/countries/palestinian-territories#/?affiliations_religion_id=0&affiliations_year=2010&region_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 report or exhibits.**

**Forms I-485 and N-400 Subject to CARRP**

Original USCIS Data Compared to Updated USCIS Data

FY 2013–FY 2019<sup>[1]</sup>

FY of Receipt	Form I-485			Form N-400			Forms I-485 and N-400		
	Original Data	Updated Data	Change	Original Data	Updated Data	Change	Original Data	Updated Data	Change
<b>All Years</b>	<b>5,642</b>	<b>9,468</b>	<b>3,826</b>	<b>9,561</b>	<b>18,746</b>	<b>9,185</b>	<b>15,203</b>	<b>28,214</b>	<b>13,011</b>
2013	221	1,401	1,180	112	2,024	1,912	333	3,425	3,092
2014	217	1,262	1,045	276	2,977	2,701	493	4,239	3,746
2015	533	1,719	1,186	675	3,871	3,196	1,208	5,590	4,382
2016	1,341	1,790	449	2,183	3,546	1,363	3,524	5,336	1,812
2017	1,492	1,540	48	2,874	2,937	63	4,366	4,477	111
2018	1,229	1,211	-18	2,212	2,219	7	3,441	3,430	-11
2019	609	545	-64	1,229	1,172	-57	1,838	1,717	-121

Source: 2019-11 Wagafe\_Internal\_Data\_FY2013\_FY2019 (Confidential Pursuant to Protective Order) Feb6 updates.xlsx, tab *Receipt Count*; USCIS\_Data\_June2020  
 Confidential Subject to Attorneys Eyes Only Protective Order.csv

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

## EXHIBIT AA

## Forms I-485 and N-400 with Opened NS Concern Cases

FY 2013–FY 2019

CARRP<sup>[1]</sup>

## Not-CARRP

FY of Receipt	CARRP <sup>[1]</sup>					Not-CARRP				
	NS Concern Case Opened After Receipt – Completed Before Adjudication	NS Concern Case Opened Before Receipt – Completed Before Adjudication	NS Concern Case Opened After Receipt – Completed After Adjudication	NS Concern Case Opened Before Receipt – Completed After Adjudication	NS Concern Case Opened Before Adjudication – Not Completed	No NS Case Opened	NS Concern Case Opened and Completed Before Receipt	NS Concern Case Opened and Completed After Adjudication	NS Concern Case Opened After Adjudication – Not Completed	Total Applications
<b>Total Received</b>	<b>19,553</b>	<b>2,812</b>	<b>2,864</b>	<b>978</b>	<b>2,007</b>	<b>10,582,554</b>	<b>6,467</b>	<b>2,857</b>	<b>1,082</b>	<b>10,621,174</b>
2013	2,429	387	386	173	50	1,371,064	721	837	92	1,376,139
2014	3,195	440	373	155	76	1,417,697	745	687	141	1,423,509
2015	4,394	504	412	136	144	1,416,678	749	471	188	1,423,676
2016	4,014	546	394	120	262	1,690,629	845	267	126	1,697,203
2017	3,007	449	487	107	427	1,735,818	957	155	74	1,741,481
2018	1,999	351	449	106	525	1,534,914	1,097	93	76	1,539,610
2019	515	135	363	181	523	1,415,754	1,353	347	385	1,419,556
<b>Approved<sup>[2]</sup></b>	<b>15,070</b>	<b>1,892</b>	<b>785</b>	<b>297</b>	<b>117</b>	<b>8,388,718</b>	<b>4,230</b>	<b>1,721</b>	<b>499</b>	<b>8,413,329</b>
2013	2,072	295	193	98	10	1,230,740	601	606	80	1,234,695
2014	2,657	327	166	66	18	1,278,512	645	521	116	1,283,028
2015	3,659	379	166	56	27	1,275,580	602	318	153	1,280,940
2016	3,228	391	106	42	21	1,503,879	657	156	102	1,508,582
2017	2,168	292	111	21	19	1,523,904	721	71	28	1,527,335
2018	1,172	186	41	13	18	1,230,021	775	45	17	1,232,288
2019	114	22	2	1	4	346,082	229	4	3	346,461
<b>Denied<sup>[2]</sup></b>	<b>2,372</b>	<b>430</b>	<b>849</b>	<b>310</b>	<b>239</b>	<b>681,012</b>	<b>648</b>	<b>681</b>	<b>102</b>	<b>686,643</b>
2013	283	57	178	66	20	94,159	83	223	11	95,080
2014	429	86	175	79	29	99,088	67	156	21	100,130
2015	570	77	183	60	46	104,544	114	135	23	105,752
2016	543	92	169	50	64	135,483	123	96	12	136,632
2017	379	79	103	42	51	134,586	137	53	26	135,456
2018	153	37	35	10	23	90,839	90	15	9	91,211
2019	15	2	6	3	6	22,313	34	3	0	22,382

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

## Note:

[1] I noted designated as CARRP where a second NS Concern case was opened after the current status date and this second NS Concern case has not yet been completed. These applications are included in my reconciliation of CARRP designations based on criteria met by the initial NS Concern case that was open during review of the application.

[2] Approved and Denied excludes applications with a current status date prior or equal to the receipt date.

## Forms I-485 and N-400 Statistics

## Aggregate Application Analysis

FY 2013–FY 2019<sup>[1]</sup>

	CARRP		Not-CARRP		Aggregate	
	Applications	% of Receipt Count	Applications	% of Receipt Count	Applications	% of Receipt Count
<b>Receipt Count</b>	<b>28,214</b>	<b>100.0%</b>	<b>10,592,960</b>	<b>100.0%</b>	<b>10,621,174</b>	<b>100.0%</b>
<b>Adjudicated – USCIS Decision</b>	22,361	79.3%	9,078,030	85.7%	9,100,391	85.7%
Approved and Denied	22,361	79.3%	9,077,611	85.7%	9,099,972	85.7%
Revoked	0	0.0%	412	0.0%	412	0.0%
██████████	█	█	█	█	█	█
<b>Adjudicated – Applicant Action</b>	423	1.5%	67,621	0.6%	68,044	0.6%
Admin Closed	390	1.4%	58,800	0.6%	59,190	0.6%
Withdrawn	33	0.1%	8,821	0.1%	8,854	0.1%
<b>Pending<sup>[2]</sup></b>	5,292	18.8%	1,385,544	13.1%	1,390,836	13.1%
>180 Days	4,741	16.8%	710,776	6.7%	715,517	6.7%
180 Days or Less	551	2.0%	674,768	6.4%	675,319	6.4%
<b>Excluded Applications<sup>[3]</sup></b>	138	0.5%	61,765	0.6%	61,903	0.6%

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:

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

[2] Pending represents the count of 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.

[3] 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.

**Forms I-485 and N-400 Statistics**

## Approved and Denied Application Analysis

FY 2013–FY 2019<sup>[1]</sup>

	<u>CARRP</u>		<u>Not-CARRP</u>		<u>Aggregate Approved and Denied</u>	
	<u>Applications</u>	<u>% of Approved and Denied</u>	<u>Applications</u>	<u>% of Approved and Denied</u>	<u>Applications</u>	<u>% of Approved and Denied</u>
<b>Approved and Denied</b>	<b>22,361</b>	<b>100.0%</b>	<b>9,077,611</b>	<b>100.0%</b>	<b>9,099,972</b>	<b>100.0%</b>
Approved	18,161	81.2%	8,395,168	92.5%	8,413,329	92.5%
Denied	4,200	18.8%	682,443	7.5%	686,643	7.5%

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:

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

**Form I-485 Statistics**

## Aggregate Application Analysis

FY 2013–FY 2019<sup>[1]</sup>

	CARRP		Not-CARRP		Aggregate	
	Applications	% of Receipt Count	Applications	% of Receipt Count	Applications	% of Receipt Count
<b>Receipt Count</b>	<b>9,468</b>	<b>100.0%</b>	<b>4,636,594</b>	<b>100.0%</b>	<b>4,646,062</b>	<b>100.0%</b>
<b>Adjudicated – USCIS Decision</b>	7,316	77.3%	3,817,513	82.3%	3,824,829	82.3%
Approved and Denied	7,316	77.3%	3,817,094	82.3%	3,824,410	82.3%
Revoked	0	0.0%	412	0.0%	412	0.0%
██████████	0	0.0%	7	0.0%	7	0.0%
<b>Adjudicated – Applicant Action</b>	98	1.0%	20,894	0.5%	20,992	0.5%
Admin Closed	98	1.0%	20,894	0.5%	20,992	0.5%
Withdrawn	0	0.0%	0	0.0%	0	0.0%
<b>Pending<sup>[2]</sup></b>	1,944	20.5%	755,676	16.3%	757,620	16.3%
>180 Days	1,766	18.7%	468,530	10.1%	470,296	10.1%
180 Days or Less	178	1.9%	287,146	6.2%	287,324	6.2%
<b>Excluded Applications<sup>[3]</sup></b>	110	1.2%	42,511	0.9%	42,621	0.9%

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:

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

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

[3] 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.

**Form I-485 Statistics**

## Approved and Denied Application Analysis

FY 2013–FY 2019<sup>[1]</sup>

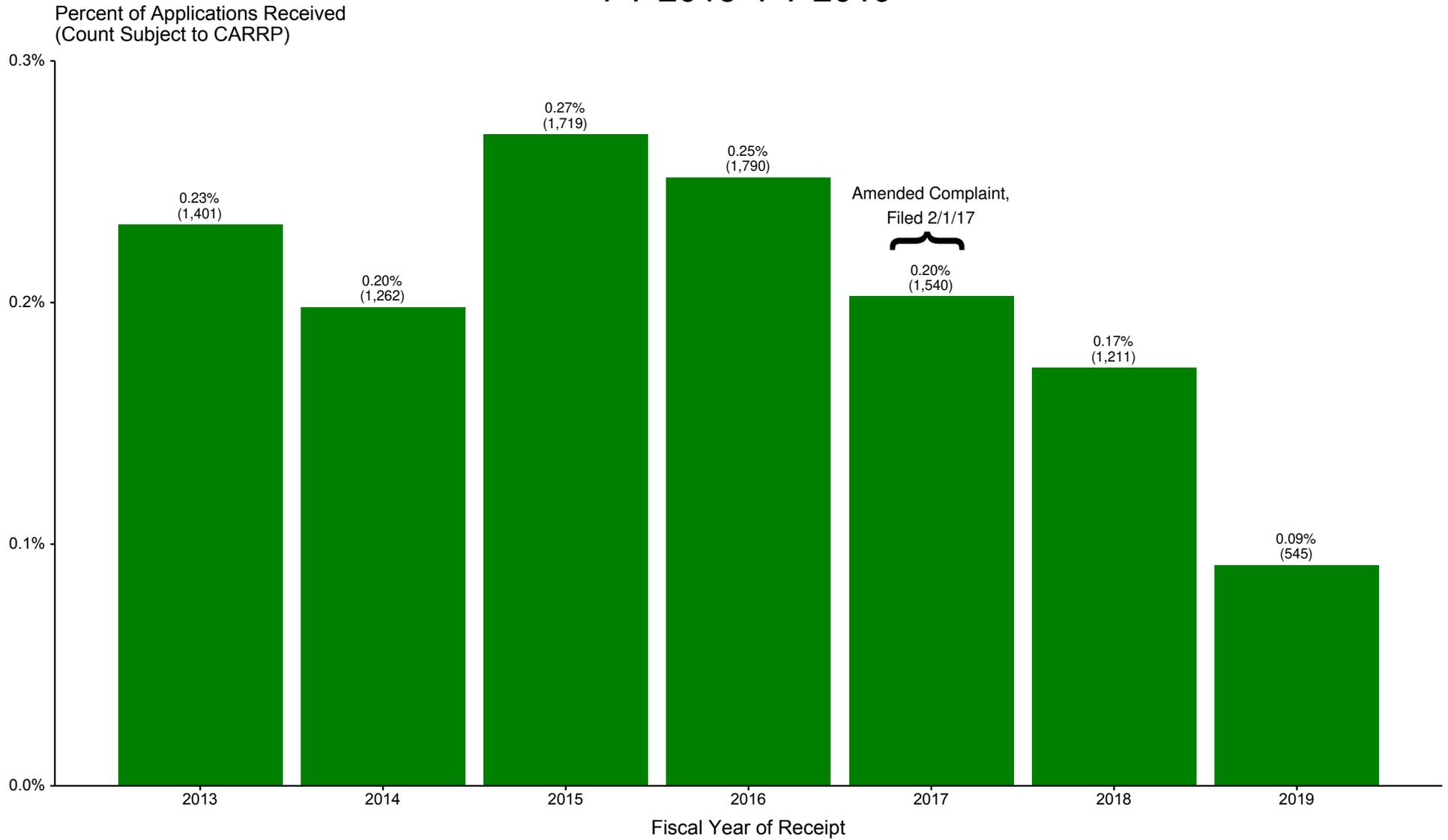
	<b>CARRP</b>		<b>Not-CARRP</b>		<b>Aggregate Approved and Denied</b>	
	<b>Applications</b>	<b>% of Approved and Denied</b>	<b>Applications</b>	<b>% of Approved and Denied</b>	<b>Applications</b>	<b>% of Approved and Denied</b>
<b>Approved and Denied</b>	<b>7,316</b>	<b>100.0%</b>	<b>3,817,094</b>	<b>100.0%</b>	<b>3,824,410</b>	<b>100.0%</b>
Approved	5,844	79.9%	3,559,984	93.3%	3,565,828	93.2%
Denied	1,472	20.1%	257,110	6.7%	258,582	6.8%

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:

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

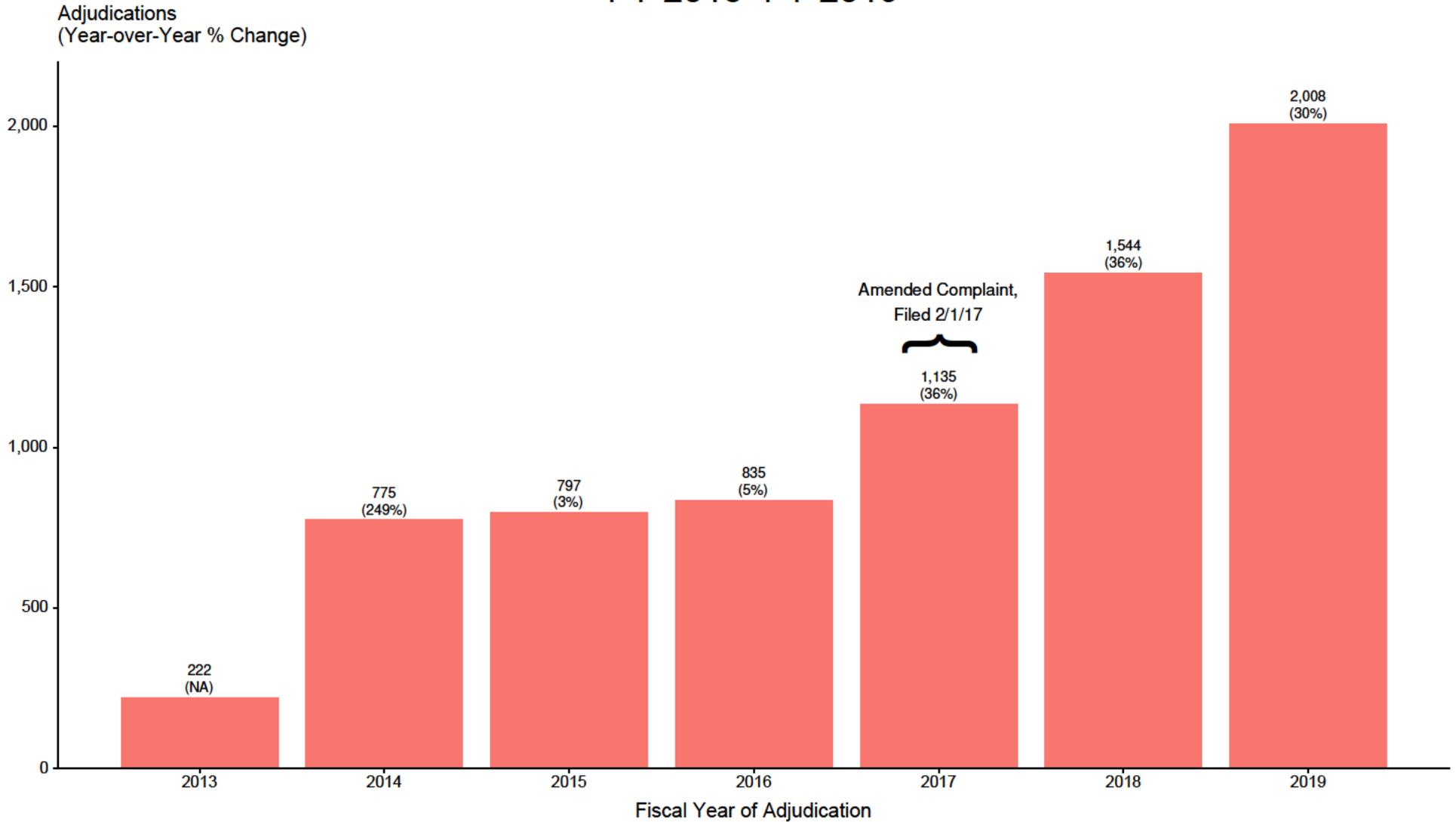
# Forms I-485 Subject to CARRP FY 2013–FY 2019



Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv; Amended Complaint, 2/1/17

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

# Forms I-485 Subject to CARRP and Adjudicated by USCIS Decision FY 2013–FY 2019



Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv; Amended Complaint, 2/1/17

Note: Applications adjudicated by USCIS decision include applications with a current status of "Approved," "Denied," "Revoked," or "DOS Revoked," and excludes applications with a current status date prior or equal to the receipt date. The USCIS fiscal year is defined as October 1 through September 30 of the following year.

**Form N-400 Statistics**

## Aggregate Application Analysis

FY 2013–FY 2019<sup>[1]</sup>

	CARRP		Not-CARRP		Aggregate	
	Applications	% of Receipt Count	Applications	% of Receipt Count	Applications	% of Receipt Count
<b>Receipt Count</b>	<b>18,746</b>	<b>100.0%</b>	<b>5,956,366</b>	<b>100.0%</b>	<b>5,975,112</b>	<b>100.0%</b>
<b>Adjudicated – USCIS Decision</b>	15,045	80.3%	5,260,517	88.3%	5,275,562	88.3%
Approved and Denied	15,045	80.3%	5,260,517	88.3%	5,275,562	88.3%
Revoked	0	0.0%	0	0.0%	0	0.0%
██████████	0	0.0%	0	0.0%	0	0.0%
<b>Adjudicated – Applicant Action</b>	325	1.7%	46,727	0.8%	47,052	0.8%
Admin Closed	292	1.6%	37,906	0.6%	38,198	0.6%
Withdrawn	33	0.2%	8,821	0.1%	8,854	0.1%
<b>Pending<sup>[2]</sup></b>	3,348	17.9%	629,868	10.6%	633,216	10.6%
>180 Days	2,975	15.9%	242,246	4.1%	245,221	4.1%
180 Days or Less	373	2.0%	387,622	6.5%	387,995	6.5%
<b>Excluded Applications<sup>[3]</sup></b>	28	0.1%	19,254	0.3%	19,282	0.3%

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:

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

[2] Pending represents the count of N-400 applications that had pending system statuses on 9/30/19 that did not have United States citizen status.

[3] 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 United States citizen status for N-400 applications.

**Form N-400 Statistics**

## Approved and Denied Application Analysis

FY 2013–FY 2019<sup>[1]</sup>

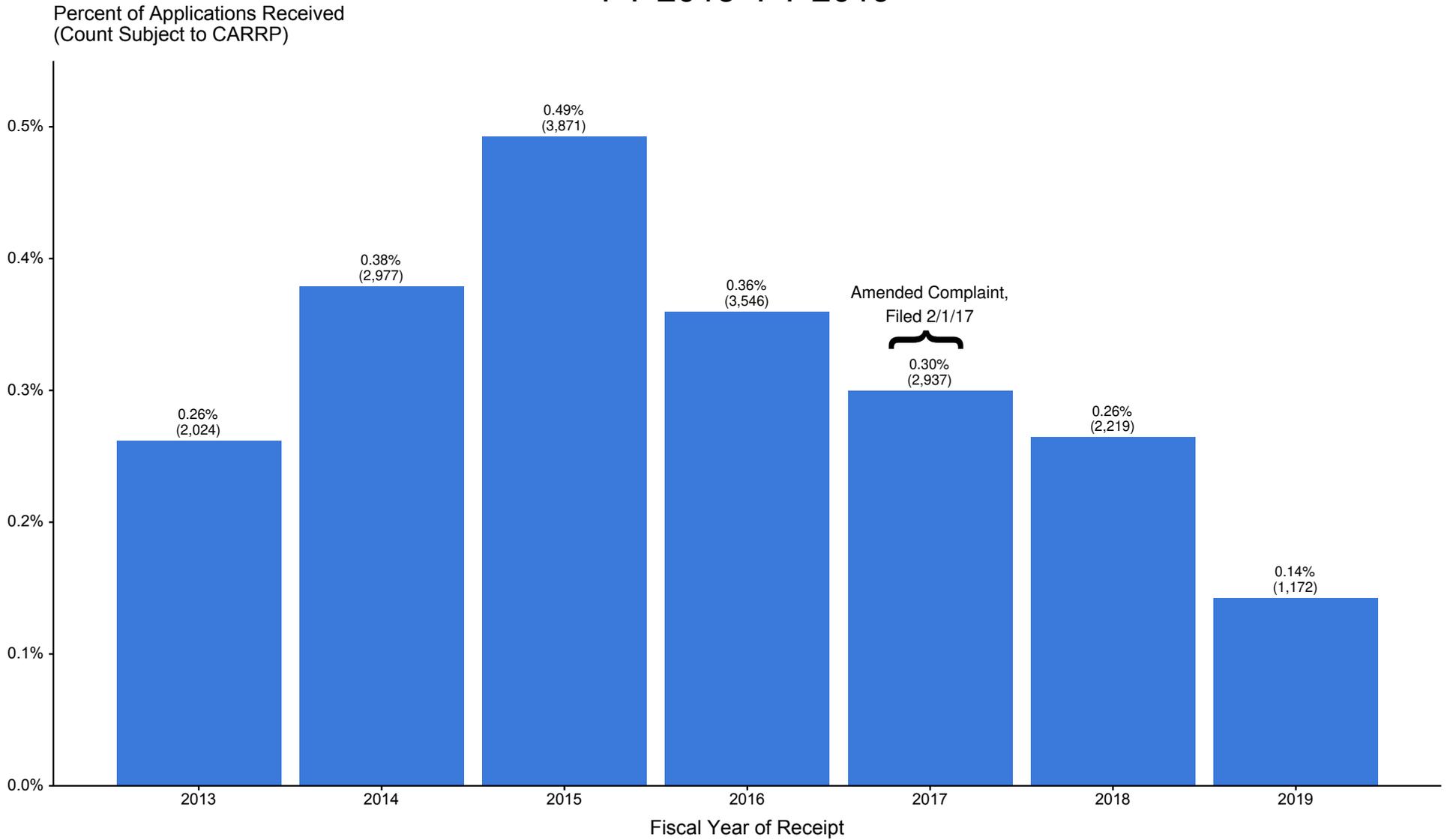
	<u>CARRP</u>		<u>Not-CARRP</u>		<u>Aggregate Approved and Denied</u>	
	<u>Applications</u>	<u>% of Approved and Denied</u>	<u>Applications</u>	<u>% of Approved and Denied</u>	<u>Applications</u>	<u>% of Approved and Denied</u>
<b>Approved and Denied</b>	<b>15,045</b>	<b>100.0%</b>	<b>5,260,517</b>	<b>100.0%</b>	<b>5,275,562</b>	<b>100.0%</b>
Approved	12,317	81.9%	4,835,184	91.9%	4,847,501	91.9%
Denied	2,728	18.1%	425,333	8.1%	428,061	8.1%

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:

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

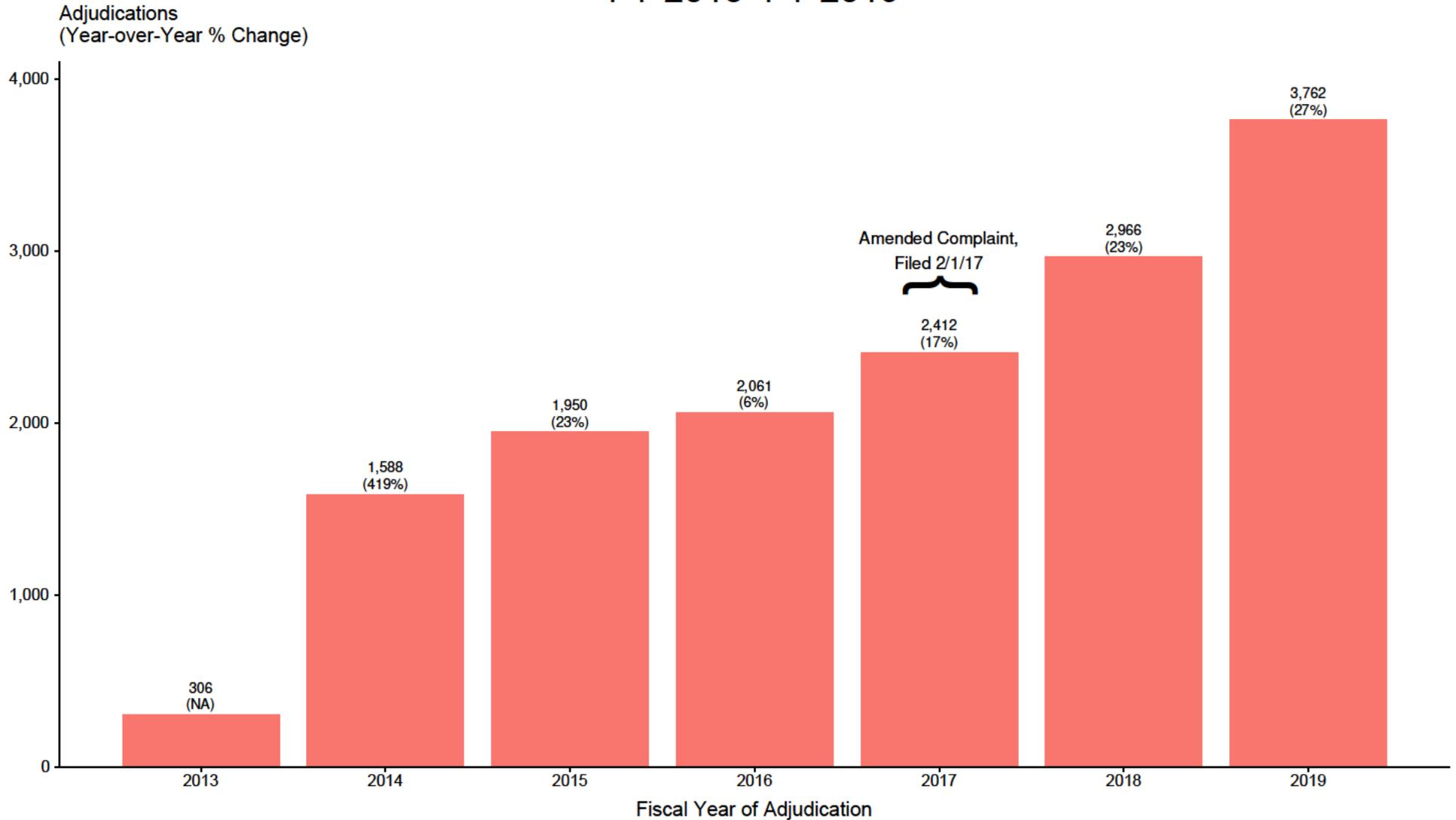
# Forms N-400 Subject to CARRP FY 2013–FY 2019



Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv; Amended Complaint, 2/1/17

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

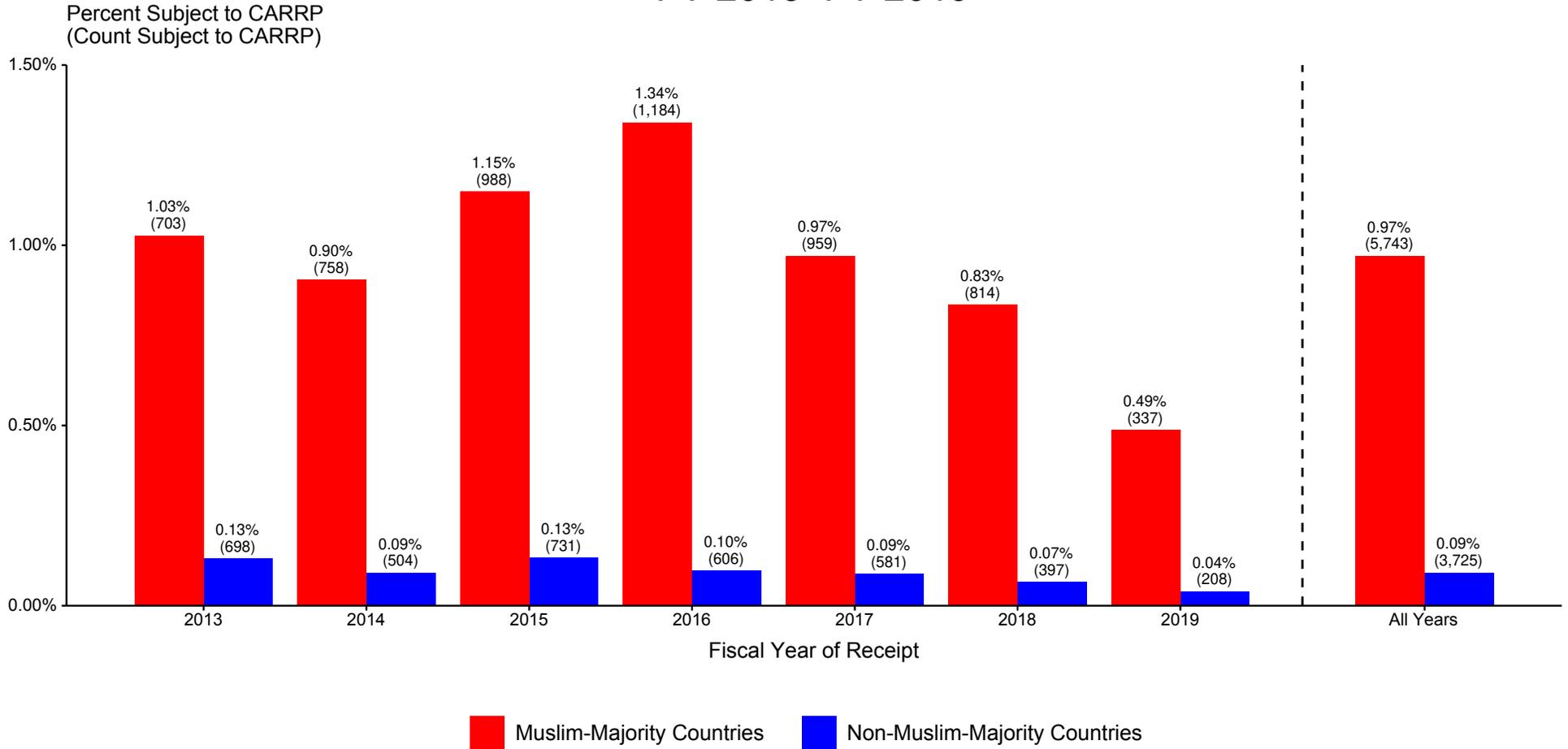
# Forms N-400 Subject to CARRP and Adjudicated by USCIS Decision FY 2013–FY 2019



Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv; Amended Complaint, 2/1/17

Note: Applications adjudicated by USCIS decision include applications with a current status of "Approved," "Denied," "Revoked," or [REDACTED] and excludes applications with a current status date prior or equal to the receipt date. The USCIS fiscal year is defined as October 1 through September 30 of the following year.

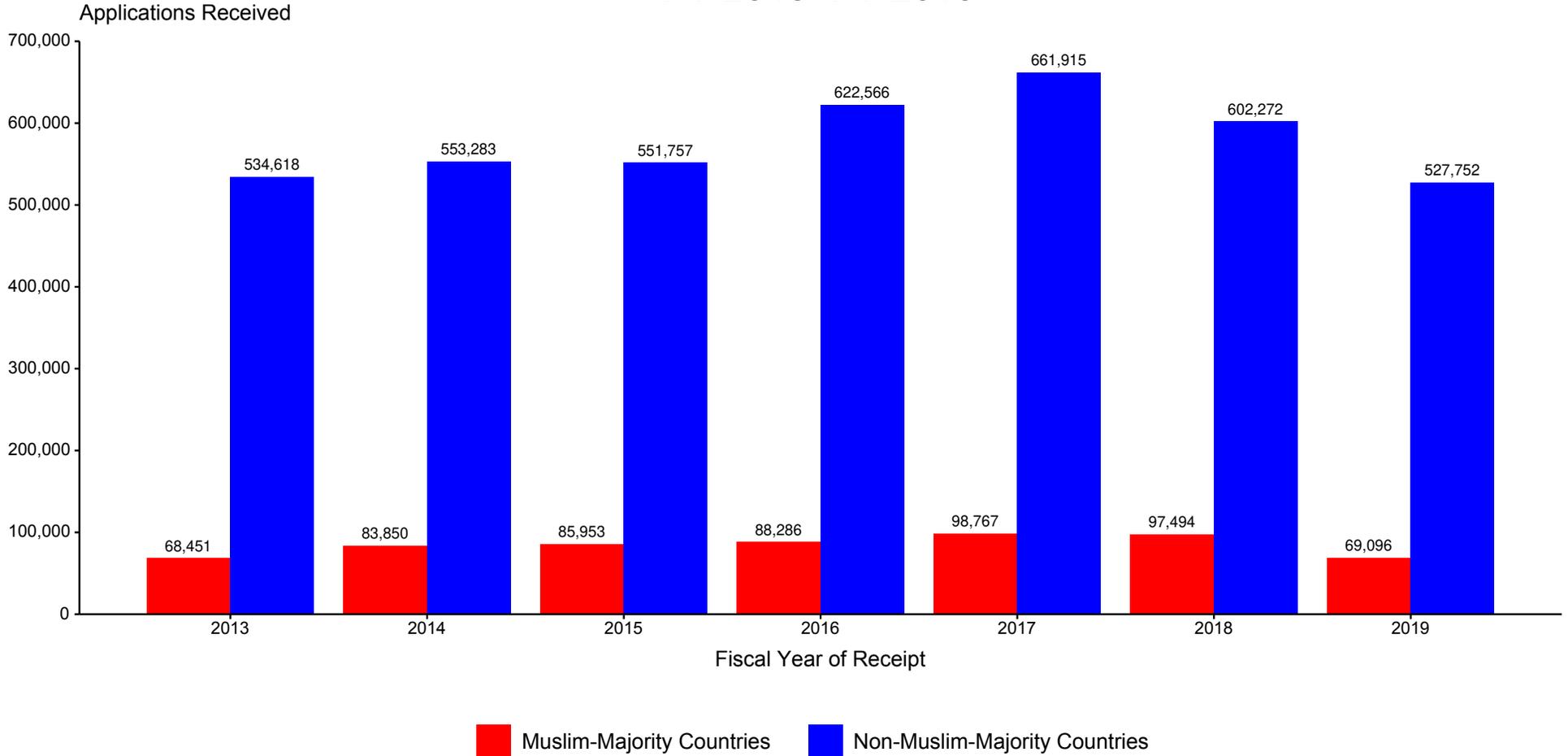
## Forms I-485 Subject to CARRP Muslim- vs. Non-Muslim-Majority Countries FY 2013–FY 2019



Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv; CIA World Factbook; Encyclopædia Britannica, Britannica Group, Inc.; Pew-Templeton Global Religious Futures Project, Pew Research Center

Note: This analysis is based on an applicant's country of birth. The following USCIS "country" entries are excluded from the analysis: Antarctica and Europe. Muslim-majority countries are countries whose official religion is Islam or countries with 50% or more of the population practicing Islam. The USCIS fiscal year is defined as October 1 through September 30 of the following year.

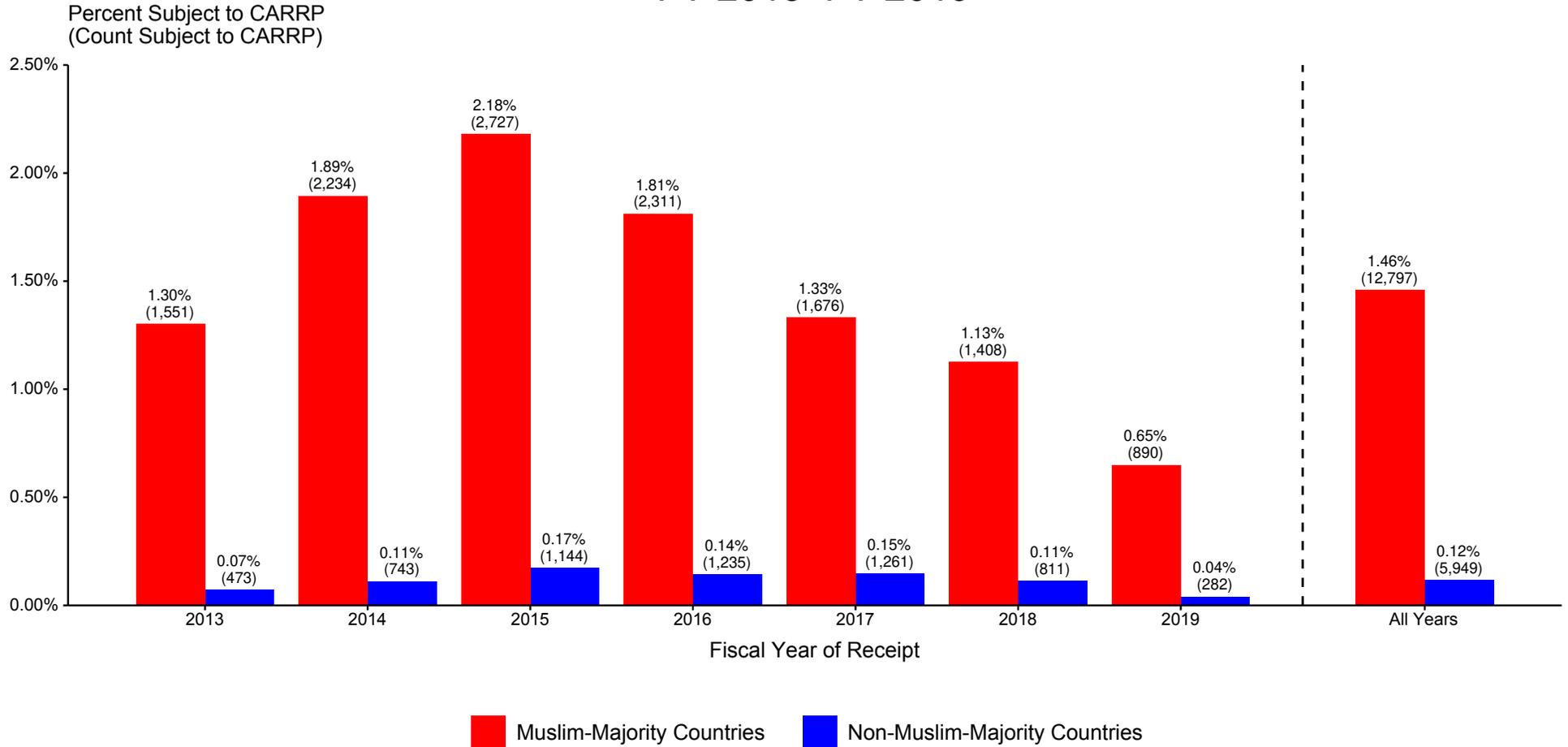
## Forms I-485 Received Muslim- vs. Non-Muslim-Majority Countries FY 2013–FY 2019



Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv; CIA World Factbook; Encyclopædia Britannica, Britannica Group, Inc.; Pew-Templeton Global Religious Futures Project, Pew Research Center

Note: This analysis is based on an applicant's country of birth. The following USCIS "country" entries are excluded from the analysis: Antarctica and Europe. Muslim-majority countries are countries whose official religion is Islam or countries with 50% or more of the population practicing Islam. The USCIS fiscal year is defined as October 1 through September 30 of the following year.

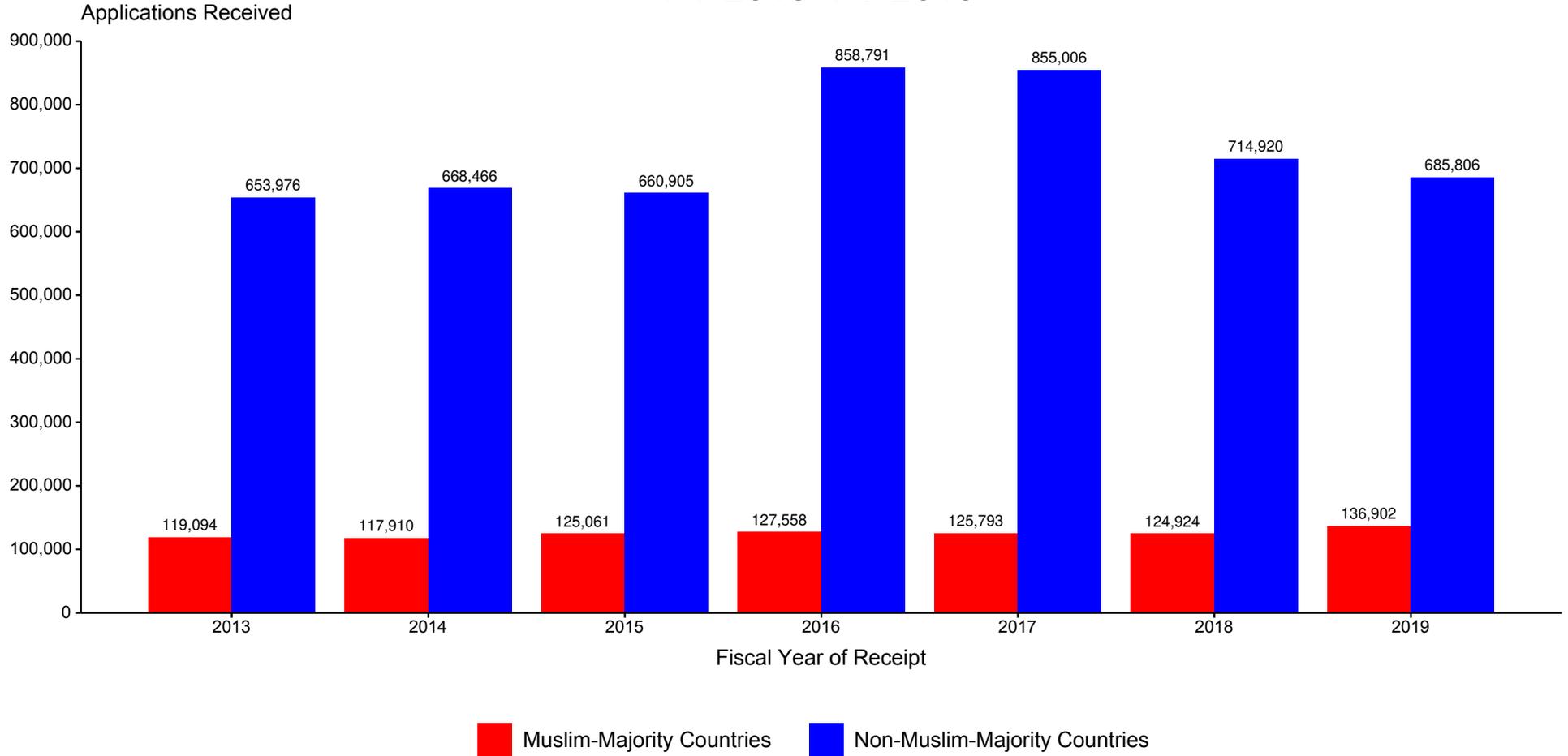
## Forms N-400 Subject to CARRP Muslim- vs. Non-Muslim-Majority Countries FY 2013–FY 2019



Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv; CIA World Factbook; Encyclopædia Britannica, Britannica Group, Inc.; Pew-Templeton Global Religious Futures Project, Pew Research Center

Note: This analysis is based on an applicant's country of birth. The following USCIS "country" entries are excluded from the analysis: Antarctica and Europe. Muslim-majority countries are countries whose official religion is Islam or countries with 50% or more of the population practicing Islam. The USCIS fiscal year is defined as October 1 through September 30 of the following year.

## Forms N-400 Received Muslim- vs. Non-Muslim-Majority Countries FY 2013–FY 2019

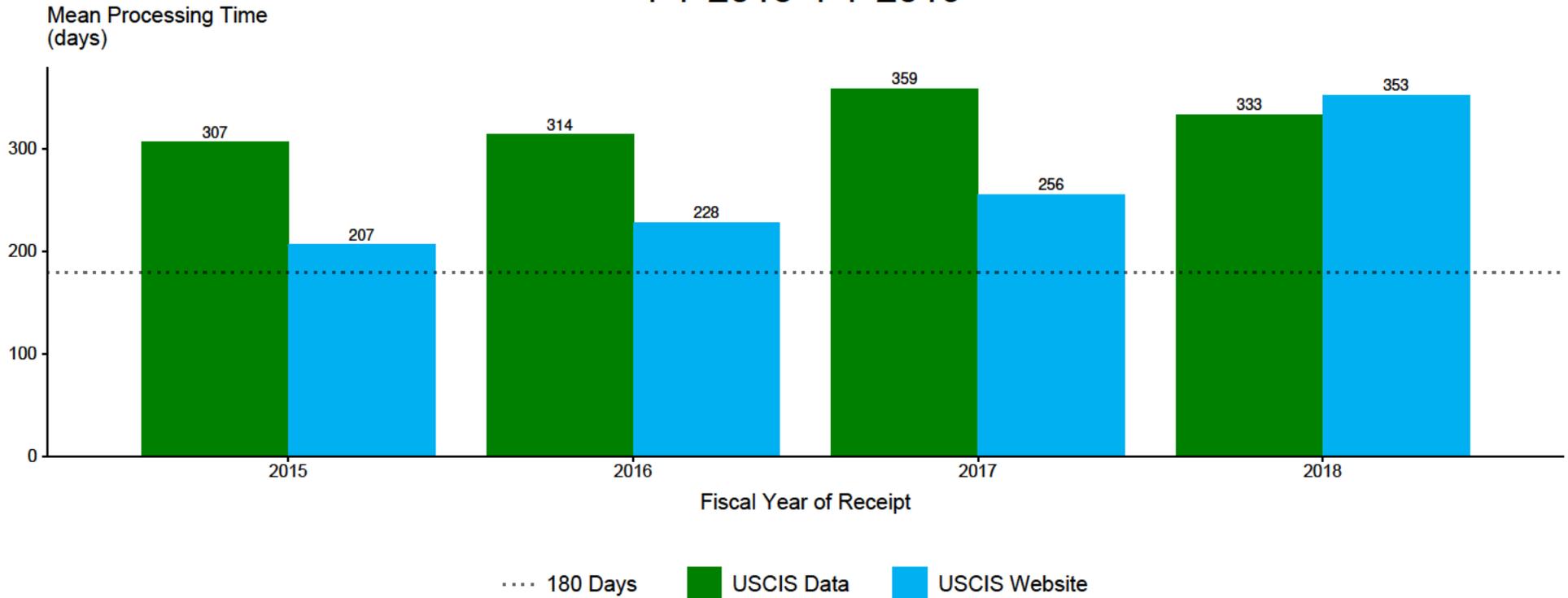


Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv; CIA World Factbook; Encyclopædia Britannica, Britannica Group, Inc.; Pew-Templeton Global Religious Futures Project, Pew Research Center

Note: This analysis is based on an applicant's country of birth. The following USCIS "country" entries are excluded from the analysis: Antarctica and Europe. Muslim-majority countries are countries whose official religion is Islam or countries with 50% or more of the population practicing Islam. The USCIS fiscal year is defined as October 1 through September 30 of the following year.

## Pending Forms I-485 Mean Processing Time

### Updated USCIS Produced Data vs. USCIS Website FY 2015–FY 2019



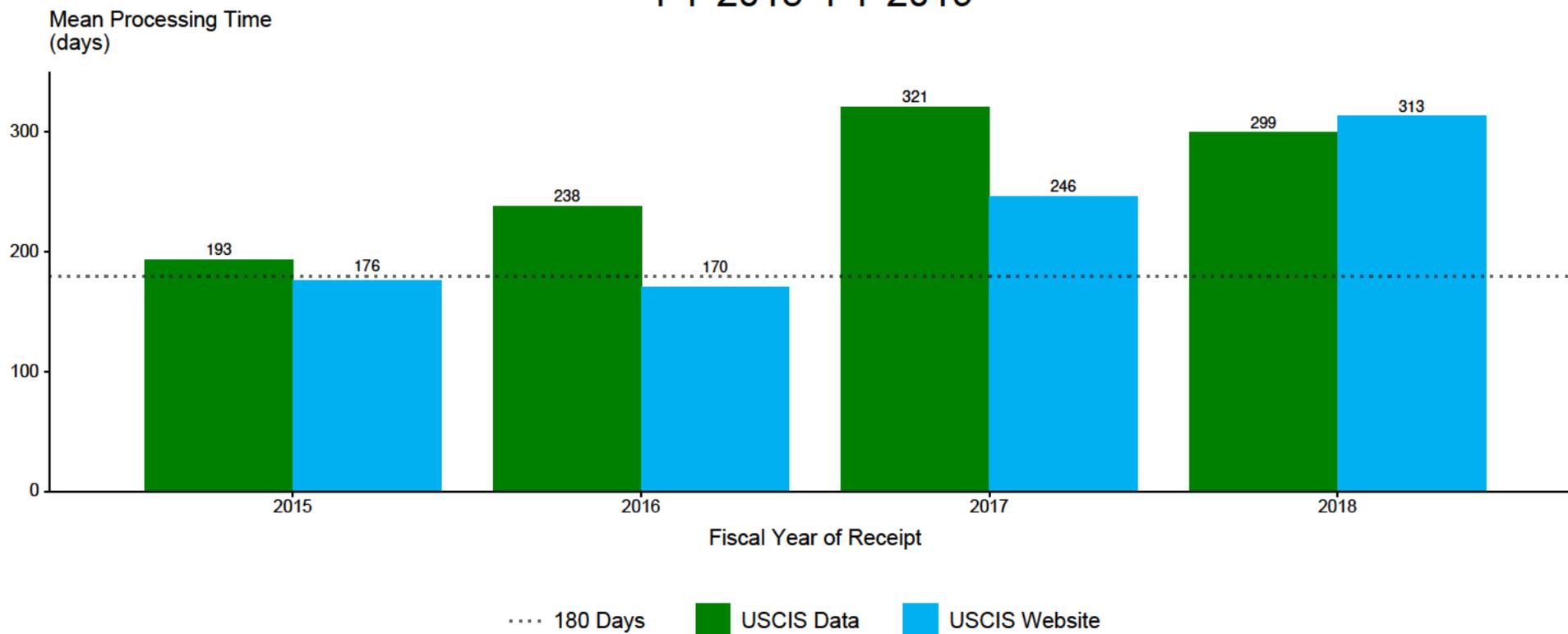
Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv; Historical National Average Processing Time for All USCIS Offices, available at <https://egov.uscis.gov/processing-times/historic-pt>, accessed 2/22/20 and 7/15/20; 8 U.S. Code § 1571–1572

Note: USCIS Website does not contain data for fiscal years prior to 2015. USCIS Website states that mean processing times "are based on the length of time that an office's application/petition receipts have been awaiting adjudication (pending)." Mean processing times shown from USCIS Website are the maximum of the mean processing times for all classifications of Form I-485. Mean processing times are reported in terms of months on the USCIS Website; I have converted these values to days using a factor of 365/12. Processing times are calculated from the Updated USCIS Detailed Data by taking the difference between the current status date and receipt date for each application, excluding applications with a current status date prior or equal to the receipt date, and excluding pending Forms I-485 that had lawful permanent resident or United States citizen status. USCIS did not provide the underlying data to calculate the means shown on its website. 8 U.S. Code § 1571 states that "processing of an immigration benefit application should be completed not later than 180 days after the initial filing of the application." The USCIS fiscal year is defined as October 1 through September 30 of the following year.

## Pending Forms N-400 Mean Processing Time

### Updated USCIS Produced Data vs. USCIS Website

#### FY 2015–FY 2019



Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv; Historical National Average Processing Time for All USCIS Offices, available at <https://egov.uscis.gov/processing-times/historic-pt>, accessed 2/22/20 and 7/15/20; 8 U.S. Code § 1571–1572

Note: USCIS Website does not contain data for fiscal years prior to 2015. USCIS Website states that mean processing times "are based on the length of time that an office's application/petition receipts have been awaiting adjudication (pending)." Mean processing times are reported in terms of months on the USCIS Website; I have converted these values to days using a factor of 365/12. Processing times are calculated from the Updated USCIS Detailed Data by taking the difference between the current status date and receipt date for each application, excluding applications with a current status date prior or equal to the receipt date, and excluding pending forms N-400 that had United States citizen status. USCIS did not provide the underlying data to calculate the means shown on its website. 8 U.S. Code § 1571 states that "processing of an immigration benefit application should be completed not later than 180 days after the initial filing of the application." The USCIS fiscal year is defined as October 1 through September 30 of the following year.

**Summary of Class List Data**<sup>[1]</sup>

Forms I-485 and N-400

<b>Class List</b>	<b>Total Records</b>	<b>Unique Alien Number–Form Combinations</b> <sup>[2]</sup>	<b>Unique Alien Numbers Not on Any Prior List</b>
<b>Overall</b> <sup>[3]</sup>	<b>35,499</b>	<b>11,297</b>	<b>N/A</b>
4/12/18	4,506	4,502	4,502
6/30/18	6,192	6,009	2,890
9/30/18	5,820	5,643	373
12/31/18	5,507	5,369	1,210
3/31/19	5,070	4,959	1,018
6/30/19	4,612	4,515	927
9/30/19	3,792	3,711	377

Source: Class Lists

Note:

[1] This analysis excludes Alien numbers for which the Application Status column contained the value "Approved" or the Approved Not Oathed column contained the value "Yes." This analysis also excludes these Alien numbers if they appear on subsequent Class Lists after appearing with either of these values.

[2] Count of Unique Alien Number–Form Combinations represents the number of unique Alien numbers associated with each form on each class list.

[3] Overall count of Unique Alien Numbers represents the number of unique Alien number and form combinations across all Class Lists.

**Summary of Class List Data**<sup>[1]</sup>

Form I-485

<b>Class List</b>	<b>Total Records</b>	<b>Unique Alien Numbers</b> <sup>[2]</sup>	<b>Unique Alien Numbers Not on Any Prior List</b>
<b>Overall</b> <sup>[3]</sup>	<b>14,811</b>	<b>4,399</b>	<b>N/A</b>
4/12/18	1,797	1,794	1,794
6/30/18	2,372	2,262	1,093
9/30/18	2,376	2,259	116
12/31/18	2,462	2,360	541
3/31/19	2,212	2,132	359
6/30/19	1,889	1,826	289
9/30/19	1,703	1,650	207

Source: Class Lists

Note:

[1] This analysis excludes Alien numbers for which the Application Status column contained the value "Approved" or the Approved Not Oathed column contained the value "Yes." This analysis also excludes these Alien numbers if they appear on subsequent Class Lists after appearing with either of these values.

[2] Count of Unique Alien Numbers represents the number of unique Alien numbers associated with an I-485 application on each class list.

[3] Overall count of Unique Alien Numbers represents the number of unique Alien numbers associated with an I-485 application across all Class Lists.

**Summary of Class List Data**<sup>[1]</sup>

Form N-400

<b>Class List</b>	<b>Total Records</b>	<b>Unique Alien Numbers</b> <sup>[2]</sup>	<b>Unique Alien Numbers Not on Any Prior List</b>
<b>Overall</b> <sup>[3]</sup>	<b>20,688</b>	<b>6,898</b>	<b>N/A</b>
4/12/18	2,709	2,708	2,708
6/30/18	3,820	3,747	1,797
9/30/18	3,444	3,384	257
12/31/18	3,045	3,009	669
3/31/19	2,858	2,827	659
6/30/19	2,723	2,689	638
9/30/19	2,089	2,061	170

Source: Class Lists

Note:

[1] This analysis excludes Alien numbers for which the Application Status column contained the value "Approved" or the Approved Not Oathed column contained the value "Yes." This analysis also excludes these Alien numbers if they appear on subsequent Class Lists after appearing with either of these values.

[2] Count of Unique Alien Numbers represents the number of unique Alien numbers associated with an N-400 application on each class list.

[3] Overall count of Unique Alien Numbers represents the number of unique Alien numbers associated with an N-400 application across all Class Lists.

Class Lists Mean and Median Days Pending<sup>[1]</sup>

Forms I-485 and N-400

Form I-485				
Class List	Count of Unique Alien Numbers <sup>[2]</sup>	Count of Unique Alien Numbers Used in Calculation <sup>[3]</sup>	Mean Days Pending	Median Days Pending
<b>Overall<sup>[4]</sup></b>	<b>4,399</b>	<b>4,399</b>	<b>1,014</b>	<b>707</b>
4/12/18	1,794	1,746	919	654
6/30/18	2,262	2,215	939	635
9/30/18	2,259	2,229	1,012	706
12/31/18	2,360	2,340	982	678
3/31/19	2,132	2,132	1,011	669
6/30/19	1,826	1,826	1,047	702
9/30/19	1,650	1,650	1,148	742
Form N-400				
Class List	Count of Unique Alien Numbers <sup>[2]</sup>	Count of Unique Alien Numbers Used in Calculation <sup>[3]</sup>	Mean Days Pending	Median Days Pending
<b>Overall<sup>[4]</sup></b>	<b>6,898</b>	<b>6,898</b>	<b>727</b>	<b>622</b>
4/12/18	2,708	2,647	709	623
6/30/18	3,747	3,699	689	571
9/30/18	3,384	3,360	733	612
12/31/18	3,009	2,996	679	595
3/31/19	2,827	2,827	680	593
6/30/19	2,689	2,689	666	580
9/30/19	2,061	2,061	707	606

Source: Class Lists

Note:

[1] This analysis excludes Alien numbers for which the Application Status column contained the value "Approved" or the Approved Not Oathed column contained the value "Yes." This analysis also excludes these Alien numbers if they appear on subsequent Class Lists after appearing with either of these values. Days pending is determined by calculating the number of days between the most recent receipt date and the class list date for each unique Alien number and form combination.

[2] Count of Unique Alien Numbers represents the number of unique Alien numbers associated with each form on each class list.

[3] I exclude Alien numbers appearing on a given class list when the date of that list is prior to the Alien number's most recent receipt date across all Class Lists. For these Alien numbers, the number of days pending would be negative, and so I exclude them from the calculation of mean and median days pending.

[4] Overall values compare the most recent receipt date to the date of the most recent class list on which a unique Alien number and form combination appears.

**Processing Times of Adjudicated Applications**

Forms I-485 and N-400 Adjudications by USCIS Decision

FY of Receipt	CARRP – Adjudication by USCIS Decision <sup>[1]</sup>			Not-CARRP – Adjudication by USCIS Decision <sup>[1]</sup>		
	Application Count	Mean Processing Time (Days)	Median Processing Time (Days)	Application Count	Mean Processing Time (Days)	Median Processing Time (Days)
<b>All Years</b>	<b>22,361</b>	<b>617</b>	<b>574</b>	<b>9,078,030</b>	<b>244</b>	<b>200</b>
2013	3,272	484	341	1,326,613	185	139
2014	4,032	542	398	1,379,195	214	171
2015	5,223	708	638	1,381,554	216	169
2016	4,706	736	696	1,640,580	246	196
2017	3,265	640	634	1,659,573	317	284
2018	1,688	435	429	1,321,846	287	278
2019	175	238	250	368,669	193	186

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:

[1] Adjudications by USCIS Decision include applications with a current status of "Approved," "Denied," "Revoked," [REDACTED] and excludes applications with a current status date prior or equal to the receipt date.

**Processing Times of Adjudicated Applications**

Form I-485 Adjudications by USCIS Decision

FY of Receipt	CARRP – Adjudication by USCIS Decision <sup>[1]</sup>			Not-CARRP – Adjudication by USCIS Decision <sup>[1]</sup>		
	Application Count	Mean Processing Time (Days)	Median Processing Time (Days)	Application Count	Mean Processing Time (Days)	Median Processing Time (Days)
<b>All Years</b>	<b>7,316</b>	<b>635</b>	<b>585</b>	<b>3,817,513</b>	<b>261</b>	<b>206</b>
2013	1,311	510	363	561,944	208	135
2014	1,155	613	478	602,234	240	177
2015	1,560	764	713	606,806	251	192
2016	1,519	742	703	671,953	268	196
2017	1,115	611	605	698,869	318	278
2018	596	429	426	549,974	286	270
2019	60	200	219	125,733	189	185

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:

[1] Adjudications by USCIS Decision include applications with a current status of "Approved," "Denied," "Revoked," [REDACTED] and excludes applications with a current status date prior or equal to the receipt date.

**Processing Times of Adjudicated Applications**

Form N-400 Adjudications by USCIS Decision

FY of Receipt	CARRP – Adjudication by USCIS Decision <sup>[1]</sup>			Not-CARRP – Adjudication by USCIS Decision <sup>[1]</sup>		
	Application Count	Mean Processing Time (Days)	Median Processing Time (Days)	Application Count	Mean Processing Time (Days)	Median Processing Time (Days)
<b>All Years</b>	<b>15,045</b>	<b>608</b>	<b>568</b>	<b>5,260,517</b>	<b>232</b>	<b>197</b>
2013	1,961	466	330	764,669	169	140
2014	2,877	513	371	776,961	193	168
2015	3,663	685	615	774,748	187	155
2016	3,187	734	694	968,627	230	195
2017	2,150	655	648	960,704	315	289
2018	1,092	438	431	771,872	287	283
2019	115	257	259	242,936	195	187

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:

[1] Adjudications by USCIS Decision include applications with a current status of "Approved," "Denied," "Revoked," [REDACTED] and excludes applications with a current status date prior or equal to the receipt date.

**Lag Between Application Receipt and Adjudication in Fiscal Years**

Forms I-485 and N-400 Adjudications by USCIS Decision

Applications Adjudicated in More than 180 Days<sup>[1]</sup>

CARRP – FYs Crossed Between Receipt and Adjudication by USCIS Decision <sup>[2]</sup>								
FY of Receipt	0	1	2	3	4	5	6	Total
<b>CARRP Applications</b>								
2013	279	1,601	554	183	95	59	49	2,820
2014	352	1,896	859	319	181	153	-	3,760
2015	192	1,717	1,991	800	456	-	-	5,156
2016	73	1,102	2,333	1,158	-	-	-	4,666
2017	27	1,039	2,183	-	-	-	-	3,249
2018	65	1,590	-	-	-	-	-	1,655
2019	141	-	-	-	-	-	-	141
<b>All Years</b>	<b>1,129</b>	<b>8,945</b>	<b>7,920</b>	<b>2,460</b>	<b>732</b>	<b>212</b>	<b>49</b>	<b>21,447</b>
<b>% of CARRP</b>								
2013	9.9%	56.8%	19.6%	6.5%	3.4%	2.1%	1.7%	100.0%
2014	9.4%	50.4%	22.8%	8.5%	4.8%	4.1%	-	100.0%
2015	3.7%	33.3%	38.6%	15.5%	8.8%	-	-	100.0%
2016	1.6%	23.6%	50.0%	24.8%	-	-	-	100.0%
2017	0.8%	32.0%	67.2%	-	-	-	-	100.0%
2018	3.9%	96.1%	-	-	-	-	-	100.0%
2019	100.0%	-	-	-	-	-	-	100.0%
<b>All Years</b>	<b>5.3%</b>	<b>41.7%</b>	<b>36.9%</b>	<b>11.5%</b>	<b>3.4%</b>	<b>1.0%</b>	<b>0.2%</b>	<b>100.0%</b>
Not-CARRP – FYs Between Receipt and Adjudication by USCIS Decision <sup>[2]</sup>								
FY of Receipt	0	1	2	3	4	5	6	Total
<b>Not-CARRP Applications</b>								
2013	111,401	251,606	25,082	7,905	4,490	2,775	2,909	406,168
2014	128,121	450,494	33,639	8,877	5,674	4,069	-	630,874
2015	169,785	378,975	47,116	13,734	6,671	-	-	616,281
2016	158,656	624,406	95,076	25,486	-	-	-	903,624
2017	288,805	865,909	201,205	-	-	-	-	1,355,919
2018	175,603	864,938	-	-	-	-	-	1,040,541
2019	194,806	-	-	-	-	-	-	194,806
<b>All Years</b>	<b>1,227,177</b>	<b>3,436,328</b>	<b>402,118</b>	<b>56,002</b>	<b>16,835</b>	<b>6,844</b>	<b>2,909</b>	<b>5,148,213</b>
<b>% of Not-CARRP</b>								
2013	27.4%	61.9%	6.2%	1.9%	1.1%	0.7%	0.7%	100.0%
2014	20.3%	71.4%	5.3%	1.4%	0.9%	0.6%	-	100.0%
2015	27.5%	61.5%	7.6%	2.2%	1.1%	-	-	100.0%
2016	17.6%	69.1%	10.5%	2.8%	-	-	-	100.0%
2017	21.3%	63.9%	14.8%	-	-	-	-	100.0%
2018	16.9%	83.1%	-	-	-	-	-	100.0%
2019	100.0%	-	-	-	-	-	-	100.0%
<b>All Years</b>	<b>23.8%</b>	<b>66.7%</b>	<b>7.8%</b>	<b>1.1%</b>	<b>0.3%</b>	<b>0.1%</b>	<b>0.1%</b>	<b>100.0%</b>

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:

[1] This analysis includes only applications which were adjudicated more than 180 days after receipt.

[2] Adjudications by USCIS Decision include applications with a current status of "Approved," "Denied," "Revoked," or "DOS Revoked," and excludes applications with a current status date prior or equal to the receipt date.

**Lag Between Application Receipt and Adjudication in Fiscal Years**

Form I-485 Adjudications by USCIS Decision

Applications Adjudicated in More than 180 Days<sup>[1]</sup>

<b>CARRP – FYs Crossed Between Receipt and Adjudication by USCIS Decision<sup>[2]</sup></b>								
<b>FY of Receipt</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>Total</b>
<b>CARRP Applications</b>								
2013	89	538	256	85	46	32	22	1,068
2014	64	453	306	120	64	64	-	1,071
2015	49	390	604	304	187	-	-	1,534
2016	33	338	709	423	-	-	-	1,503
2017	17	380	707	-	-	-	-	1,104
2018	28	541	-	-	-	-	-	569
2019	38	-	-	-	-	-	-	38
<b>All Years</b>	<b>318</b>	<b>2,640</b>	<b>2,582</b>	<b>932</b>	<b>297</b>	<b>96</b>	<b>22</b>	<b>6,887</b>
<b>% of CARRP</b>								
2013	8.3%	50.4%	24.0%	8.0%	4.3%	3.0%	2.1%	100.0%
2014	6.0%	42.3%	28.6%	11.2%	6.0%	6.0%	-	100.0%
2015	3.2%	25.4%	39.4%	19.8%	12.2%	-	-	100.0%
2016	2.2%	22.5%	47.2%	28.1%	-	-	-	100.0%
2017	1.5%	34.4%	64.0%	-	-	-	-	100.0%
2018	4.9%	95.1%	-	-	-	-	-	100.0%
2019	100.0%	-	-	-	-	-	-	100.0%
<b>All Years</b>	<b>4.6%</b>	<b>38.3%</b>	<b>37.5%</b>	<b>13.5%</b>	<b>4.3%</b>	<b>1.4%</b>	<b>0.3%</b>	<b>100.0%</b>
<b>Not-CARRP – FYs Between Receipt and Adjudication by USCIS Decision<sup>[2]</sup></b>								
<b>FY of Receipt</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>Total</b>
<b>Not-CARRP Applications</b>								
2013	46,961	125,502	18,127	6,398	3,828	2,250	1,601	204,667
2014	54,759	199,813	24,402	7,255	4,815	2,829	-	293,873
2015	76,221	203,454	35,214	11,505	4,919	-	-	331,313
2016	59,269	235,089	56,872	18,020	-	-	-	369,250
2017	90,486	323,489	106,986	-	-	-	-	520,961
2018	82,214	351,297	-	-	-	-	-	433,511
2019	66,260	-	-	-	-	-	-	66,260
<b>All Years</b>	<b>476,170</b>	<b>1,438,644</b>	<b>241,601</b>	<b>43,178</b>	<b>13,562</b>	<b>5,079</b>	<b>1,601</b>	<b>2,219,835</b>
<b>% of Not-CARRP</b>								
2013	22.9%	61.3%	8.9%	3.1%	1.9%	1.1%	0.8%	100.0%
2014	18.6%	68.0%	8.3%	2.5%	1.6%	1.0%	-	100.0%
2015	23.0%	61.4%	10.6%	3.5%	1.5%	-	-	100.0%
2016	16.1%	63.7%	15.4%	4.9%	-	-	-	100.0%
2017	17.4%	62.1%	20.5%	-	-	-	-	100.0%
2018	19.0%	81.0%	-	-	-	-	-	100.0%
2019	100.0%	-	-	-	-	-	-	100.0%
<b>All Years</b>	<b>21.5%</b>	<b>64.8%</b>	<b>10.9%</b>	<b>1.9%</b>	<b>0.6%</b>	<b>0.2%</b>	<b>0.1%</b>	<b>100.0%</b>

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:

[1] This analysis includes only applications which were adjudicated more than 180 days after receipt.

[2] Adjudications by USCIS Decision include applications with a current status of "Approved," "Denied," "Revoked," or "DOS Revoked," and excludes applications with a current status date prior or equal to the receipt date.

**Lag Between Application Receipt and Adjudication in Fiscal Years**

Form N-400 Adjudications by USCIS Decision

Applications Adjudicated in More than 180 Days<sup>[1]</sup>

CARRP – FYs Crossed Between Receipt and Adjudication by USCIS Decision <sup>[2]</sup>								
FY of Receipt	0	1	2	3	4	5	6	Total
<b>CARRP Applications</b>								
2013	190	1,063	298	98	49	27	27	1,752
2014	288	1,443	553	199	117	89	-	2,689
2015	143	1,327	1,387	496	269	-	-	3,622
2016	40	764	1,624	735	-	-	-	3,163
2017	10	659	1,476	-	-	-	-	2,145
2018	37	1,049	-	-	-	-	-	1,086
2019	103	-	-	-	-	-	-	103
<b>All Years</b>	<b>811</b>	<b>6,305</b>	<b>5,338</b>	<b>1,528</b>	<b>435</b>	<b>116</b>	<b>27</b>	<b>14,560</b>
<b>% of CARRP</b>								
2013	10.8%	60.7%	17.0%	5.6%	2.8%	1.5%	1.5%	100.0%
2014	10.7%	53.7%	20.6%	7.4%	4.4%	3.3%	-	100.0%
2015	3.9%	36.6%	38.3%	13.7%	7.4%	-	-	100.0%
2016	1.3%	24.2%	51.3%	23.2%	-	-	-	100.0%
2017	0.5%	30.7%	68.8%	-	-	-	-	100.0%
2018	3.4%	96.6%	-	-	-	-	-	100.0%
2019	100.0%	-	-	-	-	-	-	100.0%
<b>All Years</b>	<b>5.6%</b>	<b>43.3%</b>	<b>36.7%</b>	<b>10.5%</b>	<b>3.0%</b>	<b>0.8%</b>	<b>0.2%</b>	<b>100.0%</b>
Not-CARRP – FYs Between Receipt and Adjudication by USCIS Decision <sup>[2]</sup>								
FY of Receipt	0	1	2	3	4	5	6	Total
<b>Not-CARRP Applications</b>								
2013	64,440	126,104	6,955	1,507	662	525	1,308	201,501
2014	73,362	250,681	9,237	1,622	859	1,240	-	337,001
2015	93,564	175,521	11,902	2,229	1,752	-	-	284,968
2016	99,387	389,317	38,204	7,466	-	-	-	534,374
2017	198,319	542,420	94,219	-	-	-	-	834,958
2018	93,389	513,641	-	-	-	-	-	607,030
2019	128,546	-	-	-	-	-	-	128,546
<b>All Years</b>	<b>751,007</b>	<b>1,997,684</b>	<b>160,517</b>	<b>12,824</b>	<b>3,273</b>	<b>1,765</b>	<b>1,308</b>	<b>2,928,378</b>
<b>% of Not-CARRP</b>								
2013	32.0%	62.6%	3.5%	0.7%	0.3%	0.3%	0.6%	100.0%
2014	21.8%	74.4%	2.7%	0.5%	0.3%	0.4%	-	100.0%
2015	32.8%	61.6%	4.2%	0.8%	0.6%	-	-	100.0%
2016	18.6%	72.9%	7.1%	1.4%	-	-	-	100.0%
2017	23.8%	65.0%	11.3%	-	-	-	-	100.0%
2018	15.4%	84.6%	-	-	-	-	-	100.0%
2019	100.0%	-	-	-	-	-	-	100.0%
<b>All Years</b>	<b>25.6%</b>	<b>68.2%</b>	<b>5.5%</b>	<b>0.4%</b>	<b>0.1%</b>	<b>0.1%</b>	<b>0.0%</b>	<b>100.0%</b>

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:

[1] This analysis includes only applications which were adjudicated more than 180 days after receipt.

[2] Adjudications by USCIS Decision include applications with a current status of "Approved," "Denied," "Revoked," or "DOS Revoked," and excludes applications with a current status date prior or equal to the receipt date.

**Applications Pending as of Fiscal Year End 2019<sup>[1]</sup>**

Forms I-485 and N-400

FY of Receipt	CARRP			Not-CARRP		
	Total Received	Pending as of FYE 2019	% that Remained Pending	Total Received	Pending as of FYE 2019	% that Remained Pending
2013	3,425	73	2.1%	1,372,714	31,808	2.3%
2014	4,239	134	3.2%	1,419,270	28,250	2.0%
2015	5,590	253	4.5%	1,418,086	25,341	1.8%
2016	5,336	534	10.0%	1,691,867	35,152	2.1%
2017	4,477	1,129	25.2%	1,737,004	58,280	3.4%
2018	3,430	1,656	48.3%	1,536,180	190,743	12.4%
2019	1,717	1,513	88.1%	1,417,839	1,015,970	71.7%

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

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.

**Applications Pending as of Fiscal Year End 2019<sup>[1]</sup>**

Form I-485

FY of Receipt	CARRP			Not-CARRP		
	Total Received	Pending as of FYE 2019	% that Remained Pending	Total Received	Pending as of FYE 2019	% that Remained Pending
2013	1,401	50	3.6%	601,668	31,338	5.2%
2014	1,262	82	6.5%	635,871	27,531	4.3%
2015	1,719	123	7.2%	635,991	24,221	3.8%
2016	1,790	251	14.0%	709,064	30,986	4.4%
2017	1,540	395	25.6%	759,142	51,722	6.8%
2018	1,211	580	47.9%	698,555	138,652	19.8%
2019	545	463	85.0%	596,303	451,226	75.7%

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

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.

**Applications Pending as of Fiscal Year End 2019<sup>[1]</sup>**

Form N-400

FY of Receipt	CARRP			Not-CARRP		
	Total Received	Pending as of FYE 2019	% that Remained Pending	Total Received	Pending as of FYE 2019	% that Remained Pending
2013	2,024	23	1.1%	771,046	470	0.1%
2014	2,977	52	1.7%	783,399	719	0.1%
2015	3,871	130	3.4%	782,095	1,120	0.1%
2016	3,546	283	8.0%	982,803	4,166	0.4%
2017	2,937	734	25.0%	977,862	6,558	0.7%
2018	2,219	1,076	48.5%	837,625	52,091	6.2%
2019	1,172	1,050	89.6%	821,536	564,744	68.7%

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

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.

**Updated USCIS Data Country of Birth  
Unique vs. Standardized Names**

Unique USCIS Country of Birth Name	Standardized Country of Birth Name	Modified	Muslim-Majority
1. AFGHANISTAN	AFGHANISTAN		✓
2. ALBANIA	ALBANIA		✓
3. ALGERIA	ALGERIA		✓
4. AMERICAN SAMOA	AMERICAN SAMOA		
5. ANDORRA	ANDORRA		
6. ANGOLA	ANGOLA		
7. ANGUILLA	ANGUILLA		
8. ANTIGUA AND BARBUDA	ANTIGUA AND BARBUDA		
9. ARABIAN PENINSULA	ARABIAN PENINSULA		✓
10. ARGENTINA	ARGENTINA		
11. ARMENIA	ARMENIA		
12. ARUBA	ARUBA		
13. AUSTRALIA	AUSTRALIA		
14. AUSTRIA	AUSTRIA		
15. AZERBAIJAN	AZERBAIJAN		✓
16. BAHAMAS, THE	BAHAMAS, THE		
17. BAHRAIN	BAHRAIN		✓
18. BANGLADESH	BANGLADESH		✓
19. BARBADOS	BARBADOS		
20. BELARUS	BELARUS		
21. BELGIUM	BELGIUM		
22. BELIZE	BELIZE		
23. BENIN	BENIN		
24. BERMUDA	BERMUDA		
25. BHUTAN	BHUTAN		
26. BOLIVIA	BOLIVIA		
27. BOSNIA AND HERZEGOVINA	BOSNIA AND HERZEGOVINA		✓
28. BOTSWANA	BOTSWANA		
29. BRAZIL	BRAZIL		
30. BRITISH INDIAN OCEAN TERRITORY	UNITED KINGDOM	✓	

**EXHIBIT BE****Updated USCIS Data Country of Birth****Unique vs. Standardized Names**

<b>Unique USCIS Country of Birth Name</b>	<b>Standardized Country of Birth Name</b>	<b>Modified</b>	<b>Muslim-Majority</b>
31. BRITISH SOLOMON ISLANDS	SOLOMON ISLANDS	✓	
32. BRITISH VIRGIN ISLANDS	BRITISH VIRGIN ISLANDS		
33. BRUNEI	BRUNEI		✓
34. BULGARIA	BULGARIA		
35. BURKINA FASO	BURKINA FASO		✓
36. BURMA	BURMA		
37. BURUNDI	BURUNDI		
38. CABO VERDE	CABO VERDE		
39. CAMBODIA	CAMBODIA		
40. CAMEROON	CAMEROON		
41. CAMPBELL ISLAND	NEW ZEALAND	✓	
42. CANADA	CANADA		
43. CANARY ISLANDS	SPAIN	✓	
44. CAPE VERDE	CABO VERDE	✓	
45. CAYMAN ISLANDS	CAYMAN ISLANDS		
46. CENTRAL AFRICAN REPUBLIC	CENTRAL AFRICAN REPUBLIC		
47. CHAD	CHAD		✓
48. CHILE	CHILE		
49. CHINA	CHINA		
50. CHRISTMAS ISLAND	CHRISTMAS ISLAND		
51. COCOS (KEELING) ISLANDS	COCOS (KEELING) ISLANDS		✓
52. COLOMBIA	COLOMBIA		
53. COMOROS	COMOROS		✓
54. CONGO (BRAZZAVILLE)	CONGO, REPUBLIC OF THE	✓	
55. CONGO (KINSHASA)	CONGO, DEMOCRATIC REPUBLIC OF THE	✓	
56. COOK ISLANDS	COOK ISLANDS		
57. COSTA RICA	COSTA RICA		
58. CÔTE D'IVOIRE	COTE D'IVOIRE	✓	
59. CROATIA	CROATIA		
60. CUBA	CUBA		

**Updated USCIS Data Country of Birth  
Unique vs. Standardized Names**

Unique USCIS Country of Birth Name	Standardized Country of Birth Name	Modified	Muslim-Majority
61. CYPRUS	CYPRUS		
62. CZECH REPUBLIC	CZECHIA	✓	
63. CZECHIA	CZECHIA		
64. DENMARK	DENMARK		
65. DJIBOUTI	DJIBOUTI		✓
66. DOMINICA	DOMINICA		
67. DOMINICAN REPUBLIC	DOMINICAN REPUBLIC		
68. EAST GERMANY	GERMANY	✓	
69. ECUADOR	ECUADOR		
70. EGYPT	EGYPT		✓
71. EL SALVADOR	EL SALVADOR		
72. EQUATORIAL GUINEA	EQUATORIAL GUINEA		
73. ERITREA	ERITREA		✓
74. ESTONIA	ESTONIA		
75. ETHIOPIA	ETHIOPIA		
76. FALKLAND ISLANDS (ISLAS MALVINAS)	FALKLAND ISLANDS (ISLAS MALVINAS)		
77. FIJI	FIJI		
78. FINLAND	FINLAND		
79. FRANCE	FRANCE		
80. FRENCH GUIANA	FRANCE	✓	
81. FRENCH POLYNESIA	FRENCH POLYNESIA		
82. FRENCH SOUTHERN AND ANTARCTIC LANDS	FRANCE	✓	
83. FRENCH SOUTHERN TERRITORIES	FRANCE	✓	
84. GABON	GABON		
85. GAMBIA, THE	GAMBIA, THE		✓
86. GEORGIA	GEORGIA		
87. GERMAN DEMOCRATIC REPUBLIC	GERMANY	✓	
88. GERMANY	GERMANY		
89. GERMANY, WEST	GERMANY	✓	
90. GHANA	GHANA		

**EXHIBIT BE****Updated USCIS Data Country of Birth****Unique vs. Standardized Names**

Unique USCIS Country of Birth Name	Standardized Country of Birth Name	Modified	Muslim-Majority
91. GIBRALTAR	GIBRALTAR		
92. GREECE	GREECE		
93. GREENLAND	GREENLAND		
94. GRENADA	GRENADA		
95. GUADELOUPE	FRANCE	✓	
96. GUAM	GUAM		
97. GUATEMALA	GUATEMALA		
98. GUERNSEY	GUERNSEY		
99. GUINEA	GUINEA		✓
100. GUINEA-BISSAU	GUINEA-BISSAU		
101. GUYANA	GUYANA		
102. HAITI	HAITI		
103. HEARD ISLAND AND MCDONALD ISLANDS	AUSTRALIA	✓	
104. HOLY SEE	HOLY SEE (VATICAN CITY)	✓	
105. HONDURAS	HONDURAS		
106. HONG KONG	HONG KONG		
107. HUNGARY	HUNGARY		
108. ICELAND	ICELAND		
109. INDIA	INDIA		
110. INDONESIA	INDONESIA		✓
111. IRAN	IRAN		✓
112. IRAQ	IRAQ		✓
113. IRELAND	IRELAND		
114. ISLE OF MAN	ISLE OF MAN		
115. ISRAEL	ISRAEL		
116. ITALY	ITALY		
117. JAMAICA	JAMAICA		
118. JAPAN	JAPAN		
119. JORDAN	JORDAN		✓
120. KAMPUCHEA	CAMBODIA	✓	

**EXHIBIT BE****Updated USCIS Data Country of Birth****Unique vs. Standardized Names**

Unique USCIS Country of Birth Name	Standardized Country of Birth Name	Modified	Muslim-Majority
121. KAZAKHSTAN	KAZAKHSTAN		✓
122. KENYA	KENYA		
123. KIRIBATI	KIRIBATI		
124. KOREA, NORTH	KOREA, NORTH		
125. KOREA, SOUTH	KOREA, SOUTH		
126. KOSOVO	KOSOVO		✓
127. KUWAIT	KUWAIT		✓
128. KYRGYZSTAN	KYRGYZSTAN		✓
129. LAOS	LAOS		
130. LATVIA	LATVIA		
131. LEBANON	LEBANON		✓
132. LESOTHO	LESOTHO		
133. LIBERIA	LIBERIA		
134. LIBYA	LIBYA		✓
135. LIECHTENSTEIN	LIECHTENSTEIN		
136. LITHUANIA	LITHUANIA		
137. LUXEMBOURG	LUXEMBOURG		
138. MACAU	MACAU		
139. MACEDONIA	NORTH MACEDONIA	✓	
140. MADAGASCAR	MADAGASCAR		
141. MALAWI	MALAWI		
142. MALAYSIA	MALAYSIA		✓
143. MALDIVES	MALDIVES		✓
144. MALI	MALI		✓
145. MALTA	MALTA		
146. MARSHALL ISLANDS	MARSHALL ISLANDS		
147. MARTINIQUE	FRANCE	✓	
148. MAURITANIA	MAURITANIA		✓
149. MAURITIUS	MAURITIUS		
150. MAYOTTE	FRANCE	✓	

**EXHIBIT BE****Updated USCIS Data Country of Birth  
Unique vs. Standardized Names**

Unique USCIS Country of Birth Name	Standardized Country of Birth Name	Modified	Muslim-Majority
151. MEXICO	MEXICO		
152. MICRONESIA, FEDERATED STATES OF	MICRONESIA, FEDERATED STATES OF		
153. MOLDOVA	MOLDOVA		
154. MONACO	MONACO		
155. MONGOLIA	MONGOLIA		
156. MONTENEGRO	MONTENEGRO		
157. MONTserrat	MONTserrat		
158. MOROCCO	MOROCCO		✓
159. MOZAMBIQUE	MOZAMBIQUE		
160. NAMIBIA	NAMIBIA		
161. NAURU	NAURU		
162. NEPAL	NEPAL		
163. NETHERLANDS	NETHERLANDS		
164. NETHERLANDS ANTILLES	NETHERLANDS ANTILLES		
165. NEW CALEDONIA	NEW CALEDONIA		
166. NEW ZEALAND	NEW ZEALAND		
167. NICARAGUA	NICARAGUA		
168. NIGER	NIGER		✓
169. NIGERIA	NIGERIA		✓
170. NIUE	NIUE		
171. NORTH VIETNAM	VIETNAM	✓	
172. NORTHERN IRELAND	UNITED KINGDOM	✓	
173. NORTHERN MARIANA ISLANDS	NORTHERN MARIANA ISLANDS		
174. NORWAY	NORWAY		
175. OMAN	OMAN		✓
176. PACIFIC ISLANDS	PACIFIC ISLANDS		
177. PAKISTAN	PAKISTAN		✓
178. PALAU	PALAU		
179. PALESTINE	PALESTINE		✓
180. PANAMA	PANAMA		

**Updated USCIS Data Country of Birth  
Unique vs. Standardized Names**

Unique USCIS Country of Birth Name	Standardized Country of Birth Name	Modified	Muslim-Majority
181. PAPUA NEW GUINEA	PAPUA NEW GUINEA		
182. PARAGUAY	PARAGUAY		
183. PERU	PERU		
184. PHILIPPINES	PHILIPPINES		
185. PITCAIRN ISLANDS	PITCAIRN ISLANDS		
186. POLAND	POLAND		
187. PORTUGAL	PORTUGAL		
188. PUERTO RICO	PUERTO RICO		
189. QATAR	QATAR		✓
190. REUNION	FRANCE	✓	
191. ROMANIA	ROMANIA		
192. RUSSIA	RUSSIA		
193. RWANDA	RWANDA		
194. SAINT BARTHÉLEMY	SAINT BARTHELEMY	✓	
195. SAINT HELENA	SAINT HELENA, ASCENSION, AND TRISTAN DA CUNHA	✓	
196. SAINT KITTS AND NEVIS	SAINT KITTS AND NEVIS		
197. SAINT LUCIA	SAINT LUCIA		
198. SAINT MARTIN (FRENCH PART)	SAINT MARTIN	✓	
199. SAINT PIERRE AND MIQUELON	SAINT PIERRE AND MIQUELON		
200. SAINT VINCENT AND THE GRENADINES	SAINT VINCENT AND THE GRENADINES		
201. SAMOA	SAMOA		
202. SAN MARINO	SAN MARINO		
203. SAO TOME AND PRINCIPE	SAO TOME AND PRINCIPE		
204. SAUDI ARABIA	SAUDI ARABIA		✓
205. SENEGAL	SENEGAL		✓
206. SERBIA	SERBIA		
207. SEYCHELLES	SEYCHELLES		
208. SIERRA LEONE	SIERRA LEONE		✓
209. SINGAPORE	SINGAPORE		
210. SLOVAKIA	SLOVAKIA		

**EXHIBIT BE****Updated USCIS Data Country of Birth****Unique vs. Standardized Names**

Unique USCIS Country of Birth Name	Standardized Country of Birth Name	Modified	Muslim-Majority
211. SLOVENIA	SLOVENIA		
212. SOLOMON ISLANDS	SOLOMON ISLANDS		
213. SOMALIA	SOMALIA		✓
214. SOUTH AFRICA	SOUTH AFRICA		
215. SOUTH SUDAN	SOUTH SUDAN		
216. SOUTH VIETNAM	VIETNAM	✓	
217. SPAIN	SPAIN		
218. SRI LANKA	SRI LANKA		
219. STATELESS	STATELESS		
220. SUDAN	SUDAN		✓
221. SURINAME	SURINAME		
222. SVALBARD AND JAN MAYEN	NORWAY	✓	
223. SWAZILAND	ESWATINI	✓	
224. SWEDEN	SWEDEN		
225. SWITZERLAND	SWITZERLAND		
226. SYRIA	SYRIA		✓
227. TAIWAN	TAIWAN		
228. TAJIKISTAN	TAJIKISTAN		✓
229. TANZANIA	TANZANIA		
230. THAILAND	THAILAND		
231. TIMOR-LESTE	TIMOR-LESTE		
232. TOGO	TOGO		
233. TONGA	TONGA		
234. TRINIDAD AND TOBAGO	TRINIDAD AND TOBAGO		
235. TRUST TERRITORY	TRUST TERRITORY		
236. TUNISIA	TUNISIA		✓
237. TURKEY	TURKEY		✓
238. TURKMENISTAN	TURKMENISTAN		✓
239. TURKS AND CAICOS ISLANDS	TURKS AND CAICOS ISLANDS		
240. TUVALU	TUVALU		

**EXHIBIT BE****Updated USCIS Data Country of Birth****Unique vs. Standardized Names**

Unique USCIS Country of Birth Name	Standardized Country of Birth Name	Modified	Muslim-Majority
241. UGANDA	UGANDA		
242. UKRAINE	UKRAINE		
243. UNITED ARAB EMIRATES	UNITED ARAB EMIRATES		✓
244. UNITED ARAB REPUBLIC	UNITED ARAB REPUBLIC		✓
245. UNITED KINGDOM	UNITED KINGDOM		
246. UNKNOWN	UNKNOWN		
247. URUGUAY	URUGUAY		
248. USSR	SOVIET UNION	✓	
249. UZBEKISTAN	UZBEKISTAN		✓
250. VANUATU	VANUATU		
251. VENEZUELA	VENEZUELA		
252. VIETNAM	VIETNAM		
253. VIRGIN ISLANDS, BRITISH	BRITISH VIRGIN ISLANDS	✓	
254. WALLIS AND FUTUNA	WALLIS AND FUTUNA		
255. WESTERN SAHARA	WESTERN SAHARA		✓
256. WESTERN SAMOA	SAMOA	✓	
257. YEMEN	YEMEN		✓
258. YUGOSLAVIA	YUGOSLAVIA		
259. ZAIRE	CONGO, DEMOCRATIC REPUBLIC OF THE	✓	
260. ZAMBIA	ZAMBIA		
261. ZANZIBAR	ZANZIBAR		✓
262. ZIMBABWE	ZIMBABWE		

Source: USCIS\_Data\_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv; 2020-06\_Wagafe\_Internal\_Data\_FY2013-2019\_(Confidential\_Pursuant\_to\_Protective\_Order).xlsx; CIA World Factbook; Encyclopædia Britannica, Britannica Group, Inc.; Pew-Templeton Global Religious Futures Project, Pew Research Center