

# EXHIBIT 104

~~FILED UNDER SEAL~~

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

-----x

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

-vs- : No.

DONALD TRUMP, President of the: 17-cv-00094 RAJ  
United States, et al., :  
Defendants. :

-----x

CONFIDENTIAL UNDER THE PROTECTIVE ORDER

30 (B) (6) VIDEOTAPED DEPOSITION OF USCIS

BY AND THROUGH KEVIN QUINN

Thursday, September 3, 2020

10:09 a.m.

Job No.: 623013

Pages 1 - 312

Reported by: Tammy S. Newton

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Page 2

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2

Confidential videotaped deposition

3

of KEVIN QUINN taken by Counsel for Plaintiffs,

4

held remotely before Tammy S. Newton, Notary

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Public, beginning at approximately 10:09 a.m.

6

EST, when were present on behalf of the

7

respective parties:

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A P P E A R A N C E S

ON BEHALF OF PLAINTIFFS:

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1           A P P E A R A N C E S (Continued):

2           ON BEHALF OF THE DEFENDANTS:

3           BRIAN C. KIPNIS, ESQUIRE

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1           A P P E A R A N C E S (Continued):

2           ON BEHALF OF DEFENDANTS:

3           CAITLIN MILLER, ESQUIRE

4           JESSICA SCHAU NELSON, ESQUIRE

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16          ALSO PRESENT:

17          DAN KATZ, Videotape Operator

18

19

20

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1 C O N T E N T S

2 EXAMINATION OF KEVIN QUINN PAGE:

3 By Ms. Pasquarella 8

4 By Mr. Kipnis 307

5

6 DEPOSITION EXHIBITS PAGE:

7 Number 1 - Notice of Deposition 9

8 Number 2 - Certified Administrative

9 Record 17

10 Number 3 - Training Module 4 166

11 Number 4 - Interoffice Memo 218

12 Number 5 - Training Module 4 221

13

14 (All exhibits attached to transcript.)

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1 P R O C E E D I N G S

2 VIDEOTAPE OPERATOR: We are now on the  
3 record. This begins Video 1 in the deposition of  
4 Kevin Quinn in the matter of Abdiqafar Wagafe, et  
5 al. versus Donald Trump, President of the United  
6 States, et al. in the United States District  
7 Court, Western Division of Washington at Seattle.

8 Today's date is Thursday, September  
9 3rd, 2020. The time is 10:09 a.m. This  
10 deposition is being taken remotely at the request  
11 of Perkins Coie LLP. The videographer's name is  
12 Dan Katz, and the court reporter is Tammy Newton,  
13 both from Magna Legal Services. All counsel and  
14 parties present will be noted on the stenographic  
15 record. Will the court reporter please swear in  
16 the witness.

17 COURT REPORTER: Does everyone  
18 stipulate to the following: No party to the  
19 litigation will object to the remote deposition  
20 on the grounds that the stenographer may not have  
21 the legal authority to swear in the witness.

22 MS. PASQUARELLA: Plaintiffs agree.



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1 MR. KIPNIS: So stipulate.

2 KEVIN QUINN,

3 after having been duly sworn remotely by the  
4 stenographer, was examined and testified as  
5 follows:

6 EXAMINATION BY COUNSEL FOR THE PLAINTIFF

7 BY MS. PASQUARELLA:

8 Q Good morning, Mr. Quinn.

9 A Good morning.

10 Q Can you please state your name and  
11 spell it for the record.

12 A Sure. My name is Kevin Quinn. Last  
13 name spelled Q-U-I-N-N. First name K-E-V-I-N.

14 Q And tell us your title.

15 A I am division chief for USCIS Fraud  
16 Detection and National Security, National  
17 Security and Public Safety Division.

18 Q How long have you been division chief?

19 A I have been a division chief for a  
20 little over four years. I've been with the  
21 National Security and Public Safety Division for  
22 a little over a year.

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1 (Simultaneous crosstalk.)

2 COURT REPORTER: Did the witness  
3 answer? I couldn't hear.

4 THE WITNESS: I asked to scroll back  
5 down again.

6 I believe that all of these -- for  
7 policy, all -- any of these documents that are  
8 policy documents are in operations. Some of the  
9 materials are not policy documents. For example,  
10 the CARRP training modules from 2015 and, for  
11 that matter, the CARRP training documents from  
12 2017. So, for example, the 2015 CARRP training  
13 modules are no longer in use.

14 BY MS. PASQUARELLA:

15 Q Okay. So aside from the 2015 training  
16 modules, is there anything else in the certified  
17 administrative record that is no longer operative  
18 or used?

19 A I would need -- at a minimum, I would  
20 need to review the 2011 fact sheet, document 11  
21 there, JR-303.

22 Q I thought you testified that you

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1 reviewed all the documents in the certified  
2 administrative record.

3 A I did. Unfortunately, I forget right  
4 now if all of the guidance in that frequently  
5 asked questions document is still current.

6 Q Okay. Anything else?

7 A Not that I recall right now.

8 Q Okay. So your -- as I understand it,  
9 the certified administrative record is composed  
10 of the policies that are -- that reflect CARRP at  
11 a national level and that are currently  
12 operative, with the caveat that you're not sure  
13 if the fact sheet is still up-to-date; is that  
14 correct?

15 A And the training slides.

16 Q And the training slides reflect two  
17 sets of modules, one from 2015 and one from 2017,  
18 and the 2015 modules are no longer being used; is  
19 that right?

20 A Correct.

21 Q Are the 2017 modules being used?

22 A Yes.

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1 Q Okay. And there's not any further  
2 updates to those 2017 modules, correct?

3 A The 2017 is still the most current  
4 version of those training slides.

5 Q Okay. Does this administrative record  
6 contain information that was considered prior to  
7 the adoption of CARRP?

8 I'm going to scroll up to the top.

9 A I'm not sure what you mean.

10 MR. KIPNIS: Objection; vague.

11 BY MS. PASQUARELLA:

12 Q Does the administrative record contain  
13 any information, aside from the policy documents  
14 and the training modules, that was considered by  
15 the agency in deciding to adopt CARRP?

16 A Other than what's in the documents,  
17 I -- I'm still not quite sure what you mean by  
18 "considered".

19 Q Okay. We can move on.

20 What was the reason why CARRP was  
21 first adopted?

22 A The agency wished to adopt a policy

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1 and practice that would standardize handling of  
2 cases involving potential national security  
3 concerns across the agency and move the  
4 responsibility for vetting and adjudicating those  
5 cases back into the local field offices, which  
6 had jurisdiction over the pending application.

7 Q So how were applications presenting  
8 national security concerns handled before CARRP  
9 was adopted?

10 A They --

11 MR. KIPNIS: Objection. Objection to  
12 scope.

13 COURT REPORTER: What was your  
14 objection?

15 MR. KIPNIS: You can answer. You can  
16 answer in your personal capacity.

17 MS. PASQUARELLA: Okay. I'm going to  
18 respond to that. This is a 30(b)(6). He has  
19 testified that he is prepared to testify about  
20 all of the 26 topics. This topic in particular  
21 is about the origin of CARRP, Topic Number 3.

22 Counsel, I assume that throughout this

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1 all of the training modules. The individual  
2 trainer for a course may be an officer from  
3 headquarters FDNS or it may be an officer on loan  
4 from a field office who has experience with CARRP  
5 and with providing training.

6 Q Do members of law enforcement  
7 participate in -- in the training of FDNS  
8 officers on CARRP?

9 A No.

10 Q Do members of law enforcement  
11 participate in the training of FDNS officers at  
12 all?

13 MR. KIPNIS: Objection; scope. You  
14 may answer in your personal capacity.

15 THE WITNESS: I -- outside of CARRP in  
16 that training, I'm not -- I don't believe so. I  
17 don't recall entirely.

18 BY MS. PASQUARELLA:

19 Q What other topics are covered in the  
20 FDNS basic training aside from CARRP?

21 MR. KIPNIS: Objection; scope. Go  
22 ahead and answer.

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1 BY MS. PASQUARELLA:

2 Q Let me rephrase actually because I  
3 imagine there are many other topics.

4 Are there any other topics related to  
5 national security that are covered in the FDNS  
6 basic training other than --

7 A No.

8 MR. KIPNIS: Objection to scope. Go  
9 ahead and answer.

10 THE WITNESS: Within sort of that  
11 objection, no. The national security related  
12 information is all presented as part of the CARRP  
13 training course.

14 BY MS. PASQUARELLA:

15 Q Okay. And what's the training that  
16 the Immigration Service officers that are  
17 appointed to handle CARRP cases received?

18 A They receive the same CARRP training  
19 that the FDNS immigration officers receive.

20 Q Okay. And when you say "the same",  
21 you mean the -- what is now the 2017 modules that  
22 we looked at in the CAR?

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1           A       Correct.

2           Q       Do they attend the same course that  
3 the FDNS officers attend?

4           A       They do not attend the FDNS officer  
5 basic training program, the two-week in-person  
6 training. But they do receive the same CARRP  
7 training presentation.

8           Q       Okay. And is theirs also in person?

9           A       To the best of my knowledge, it is.  
10 That also would be -- the scheduling of that is  
11 also done at the local level. But that training  
12 course was at least again, until the coronavirus,  
13 was intended to be an in-person training.

14          Q       Okay. And who -- who conducts the  
15 training?

16          A       As with the FDNS officer training, it  
17 may be an officer from headquarters FDNS or it  
18 may be a local officer with training and  
19 experience in CARRP and in presenting materials.

20          Q       So it's not always the case that there  
21 will be somebody from headquarters teaching the  
22 training?



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1 A That is correct.

2 Q Okay. In reviewing the 2017 training  
3 modules in preparation for the deposition, did  
4 you notice anything that appeared inaccurate?

5 MR. KIPNIS: Objection; scope.

6 THE WITNESS: The -- no. Sorry.

7 BY MS. PASQUARELLA:

8 Q Have there been updates to CARRP since  
9 those training slides were prepared that is not  
10 included in the modules?

11 A CARRP -- no. No. And I -- I  
12 apologize. I want to jump in here, and I was  
13 hoping that maybe in the next 10 minutes or so we  
14 could break for lunch. I know it's still early  
15 out on the West Coast, but over here I've been  
16 awake for about five hours.

17 Q Definitely. Let me just finish these  
18 questions about training, and then we can break.  
19 Does that work?

20 A Definitely.

21 Q And aside from the FDNS basic training  
22 and the training that we talked about the same --

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1 review of the same modules that was provided to  
2 the ISOs, are there any refresher courses on  
3 CARRP that are provided to the FDNS IOs and the  
4 ISOs that are handling CARRP cases?

5 A There are no stand-alone refresher  
6 courses separate from the CARRP training itself,  
7 but officers may attend the CARRP training when  
8 it's provided locally as a refresher if they and  
9 their supervisor wishes.

10 Q Okay. If there are updates or changes  
11 made to the CARRP policy, how -- is that  
12 communicated to officers that are handling CARRP  
13 cases?

14 A Changes to policy and practice would  
15 traditionally be communicated out through a  
16 release of a policy memo or guidance or updating  
17 standard operating procedures handbook.

18 Q And how would those changes be  
19 communicated to the officers handling CARRP  
20 cases?

21 A Typically, it would be done in a  
22 global communication to relevant officers.

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1 discovery requests. So we ask that they be  
2 updated with the more recent reviews.

3 MR. KIPNIS: Okay. We'll -- we'll  
4 take that up with you after the deposition.

5 BY MS. PASQUARELLA:

6 Q Does USCIS provide trainings on CARRP  
7 to other agencies outside USCIS?

8 A No.

9 Q USCIS officers that handle CARRP  
10 naturalization and adjustment of status  
11 applications, are those officers provided any  
12 anti-discrimination training?

13 A The agency has an annual requirement  
14 for an anti-discrimination training that's  
15 broadly regarding employment discrimination. The  
16 CARRP training modules themselves do touch on  
17 related issues, and we provide training prior to  
18 CARRP on cultural -- cultural awareness and  
19 cultural sensitivity.

20 Q The CARRP training modules, you mean  
21 the modules we discussed earlier that are  
22 contained in the certified administrative record;

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1 is that correct?

2 A Yes. That is correct.

3 Q And what is the cultural sensitivity  
4 or cultural awareness training that's provided to  
5 officers?

6 A It is a module that discusses  
7 cultural -- how do I want to put it -- cultural  
8 impacts on interpersonal communication so that  
9 officers are aware of potential cultural  
10 differences when conducting interviews with  
11 individuals from a culture not their own or that  
12 they're not otherwise familiar with.

13 Q So is it primarily geared to issues  
14 arising out of interviews for the conduct of an  
15 interview?

16 A It's broadly interviews or site visit  
17 type work.

18 Q Do FDNS-DS IOs receive this training  
19 since they don't interview?

20 A Well, FDNS IOs receive it prior to  
21 their FDNS officer basic training program course.  
22 It's a prestudy course.

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1 Q Can you explain what that means, a  
2 prestudy course?

3 A There's some material that's provided  
4 to the new FDNS IOs ahead of their attending the  
5 FDNS officer basic training program to lay a  
6 groundwork for the material that they will be  
7 learning in the FDNS officer basic.

8 Q Is that material that they review on  
9 their own time?

10 A Yes -- well, on their work time.

11 Q On -- sorry. What I mean is material  
12 that they review on their own. Yeah, okay.

13 And the cultural sensitivity training,  
14 is that a webinar or what is the format of that?

15 A Yes. It's -- it's a web-based  
16 training.

17 Q Do you know when that training was  
18 developed? What year?

19 A I believe it dates from -- I  
20 apologize. I believe it dates from 2013.

21 Q Do you know who -- who created the  
22 training, the cultural sensitivity training?

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1 MR. KIPNIS: Objection.

2 THE WITNESS: I believe it was -- I'm  
3 sorry?

4 MR. KIPNIS: I'm objecting on the  
5 basis of scope, but if you know personally,  
6 Kevin, go ahead and answer.

7 MS. PASQUARELLA: Let me interject  
8 just again, just to make sure we have a clear  
9 record on this. Plaintiffs do not concede that  
10 any of the questions that we have asked are not  
11 within the scope of the 30(b)(6).

12 To the extent that there is dispute  
13 about this after the deposition, we can discuss  
14 that, and we can take it to the judge. But until  
15 that time, we assume that the deponent has been  
16 prepared on the topics that he said he's prepared  
17 to talk about and that his testimony will bind  
18 the agency unless the Court or the parties  
19 separately agree that it doesn't.

20 MR. KIPNIS: I understand that's your  
21 position, but my objection stands. Go ahead, Mr.  
22 Quinn.

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1 THE WITNESS: The training was  
2 developed on behalf of headquarters FDNS, but  
3 I -- I do not recall who -- who individually  
4 created that training.

5 BY MS. PASQUARELLA:

6 Q It was created on behalf of --

7 A Actually, at the direction of FDNS for  
8 FDNS.

9 Q Okay. It wasn't created by FDNS?

10 MR. KIPNIS: Again, same objection.

11 THE WITNESS: I -- I don't know what  
12 you mean by "by".

13 BY MS. PASQUARELLA:

14 Q Was it an employee of FDNS that  
15 created the training?

16 A It was an employee or contractor.

17 Q Of FDNS?

18 A Of FDNS.

19 Q Okay. And you don't -- you don't know  
20 who that person was?

21 MR. KIPNIS: Same objection.

22 THE WITNESS: I don't. I apologize.

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1 BY MS. PASQUARELLA:

2 Q You don't know what that person's  
3 training or background was?

4 MR. KIPNIS: Same objection.

5 THE WITNESS: I apologize. I don't  
6 have that.

7 BY MS. PASQUARELLA:

8 Q And so you don't know what material  
9 they would have considered in formulating that  
10 training?

11 A The training itself does provide  
12 background and source material for the training.  
13 If I had a chance to review it, I could see what  
14 that was. It just slipped my memory.

15 Q Okay. Other than the cultural  
16 sensitivity -- well, scratch that.

17 You mentioned that the FDNS IOs who  
18 handle CARRP cases would receive that material as  
19 part of their prestudy course. How about the  
20 ISOs who handle CARRP cases, do they also receive  
21 the cultural sensitivity training?

22 A Yes. It is part of the CARRP



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1 prereview for that.

2 Q And is it again the same process that  
3 they're provided that prior to their CARRP  
4 training program?

5 A Yes.

6 Q So again, it's a self-study  
7 requirement?

8 A They -- yes, they take that on their  
9 work time.

10 Q Okay. Are they required to watch the  
11 training or is it optional?

12 A No. They're required to.

13 Q And how about for the FDNS IOs, are  
14 they required or is it optional?

15 A They're required.

16 Q Okay. Is that total sensitivity  
17 training used for any other immigration officer  
18 who adjudicates naturalization or adjustment of  
19 status cases outside of CARRP cases?

20 MR. KIPNIS: Objection; scope. You  
21 can answer in your capacity -- personal capacity.

22 THE WITNESS: I am not aware.

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1 senior leadership. Who does that entail?

2 A That is the deputy director of the  
3 agency.

4 Q And who is that today?

5 A The -- that is Joseph Edlow, our  
6 deputy director for policy.

7 Q Can you spell the last name?

8 A E-D-L-O-W.

9 Q Is Joseph Edlow a political appointee,  
10 if you know?

11 A I'll be honest, I don't know.

12 Q Okay. Do you know if Mr. Edlow has  
13 any experience in adjudicating immigration  
14 benefits?

15 MR. KIPNIS: Objection; scope. You  
16 can answer in your personal -- if you know.

17 THE WITNESS: I apologize. I don't  
18 know what his experience is.

19 BY MS. PASQUARELLA:

20 Q Okay. And why -- why do CARRP cases  
21 need these approvals from leadership?

22 A In developing the CARRP policy, we

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1 were aware that there were cases where we may  
2 have what we would describe as an articulable  
3 link between the applicant and elements of INA  
4 212(A)(3)(a), (b), or (f), but that might not  
5 rise to the level of making them inadmissible or  
6 ineligible for the benefits.

7           Despite that, we still wanted to  
8 ensure through leadership review that all of the  
9 steps in the CARRP process were taken, that  
10 everything was documented appropriately, and that  
11 we fully understood the nature of the national  
12 security concern and the applicant's eligibility  
13 prior to approval of those cases.

14           Q       And how does having the senior  
15 leadership at headquarters or the leadership at  
16 the field office ensure that?

17           A       It gives leadership an opportunity to  
18 review the case and to work with the  
19 adjudications FDNS personnel to ensure that  
20 everything was completed and documented  
21 appropriately.

22           Q       And outside of CARRP, are there other

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1 immigration benefits that require approval by the  
2 deputy director to be approved?

3 MR. KIPNIS: Objection; scope. You  
4 can answer in your personal capacity.

5 THE WITNESS: I'm not aware.

6 BY MS. PASQUARELLA:

7 Q And are there any immigration benefits  
8 outside of CARRP that require approval by the  
9 field office director in order to be granted?

10 MR. KIPNIS: Same objection. Same  
11 objection.

12 THE WITNESS: I'm not aware.

13 MS. PASQUARELLA: Okay. We can take a  
14 break. How much time would you like?

15 THE WITNESS: Ten minutes.

16 MS. PASQUARELLA: Okay. So we should  
17 come back at 2:10 your time, 11:10 my time?

18 THE WITNESS: Yes. Sorry. I had a  
19 clock in here that's slightly off of real time.  
20 So yes, it 2:10.

21 VIDEOTAPE OPERATOR: At 2:10 Eastern,  
22 we are off the record.

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1 (A brief recess was taken.)

2 VIDEOTAPE OPERATOR: 2:15 p.m., we're  
3 on the record.

4 BY MS. PASQUARELLA:

5 Q Okay. Mr. Quinn, can you tell me what  
6 immigration benefit forms are subject to CARRP?

7 A Broadly, all immigration benefit forms  
8 are subject to CARRP.

9 Q And are they subject to all stages of  
10 CARRP?

11 A Some benefit types might have a -- no,  
12 might have an abbreviated form of the CARRP or  
13 not have all of the steps prior to adjudication.

14 Q And what does it mean to have an  
15 abbreviated form of CARRP?

16 A So this is outside of the I-485s and  
17 N-400s.

18 Q Correct.

19 A Is that what you want to know about?

20 MR. KIPNIS: I think that's a question  
21 for you, Jennie.

22 MS. PASQUARELLA: Yes.

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\* \* \*

ACKNOWLEDGMENT OF DEPONENT

I, Kevin Quinn, do hereby acknowledge I have read and examined the foregoing pages of testimony, and the same is a true, correct and complete transcription of the testimony given by me, and any changes and/or corrections, if any, appear in the attached errata sheet signed by me.

10/30/2020

KEVIN T QUINN

Digitally signed by KEVIN T QUINN  
Date: 2020.10.30 11:12:44 -04'00'

Date Kevin Quinn

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1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, Tammy S. Newton, the officer before  
3 whom the foregoing proceedings was taken, do  
4 hereby certify that the foregoing transcript is a  
5 true and correct record of the proceedings; that  
6 said proceedings were taken by me  
7 stenographically and thereafter reduced to  
8 typewriting under my supervision; and that I am  
9 neither counsel for, related to, nor employed by  
10 any of the parties to this case and have no  
11 interest, financial or otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set  
13 my hand and affixed my notarial seal this 15th  
14 day of September, 2020.

15 My commission expires:

16 3/05/2022

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Notary Public in and for the

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State of Maryland

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