

Exhibit 55  
--Filed Under Seal--

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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	)	
ABDIQAFAR WAGAFE, et al., on	)	
behalf of themselves and others	)	No. 17-cv-00094 RAJ
similarly situated,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
DONALD TRUMP, President of the	)	
United States, et al.,	)	
	)	
Defendants.	)	

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\*\* CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER \*\*  
VIDEOTAPED DEPOSITION  
of  
NADIA R. DAUD

OCTOBER 8, 2020

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File No. 641652

REPORTED REMOTELY BY: Karen M. Grant, WA CCR No. 2155



1 scheduling interviews. I really don't remember.

2 Q. Okay. And how long did you do that particular  
3 aspect of the job?

4 A. It wasn't very long. I think it was around six  
5 months. It wasn't very long. And then it -- then they  
6 moved me up to be an officer, an interviewing officer.

7 Q. Okay. And how long were you an interviewing  
8 officer?

9 A. In San Francisco, I was an interviewing officer  
10 until -- until 2007, August 2007.

11 Q. Okay. And what were your responsibilities as an  
12 interviewing officer?

13 A. I primarily did I-485 adjustments and primarily  
14 marriage fraud.

15 Q. Okay. And what was your next job after that?

16 A. In August 2007, I moved to Washington, D.C., and  
17 joined Refugee Affairs Division, also with Department of  
18 Homeland Security with USCIS, and became a Refugee officer.

19 Q. Okay. And how long were you in that job?

20 A. I was with Refugee Affairs Division for ten --  
21 just under ten years, but I had multiple positions within  
22 Refugee Affairs.

23 Q. And what positions were those?

24 A. I was an officer for around a year so, just  
25 Refugee officer interviews. And then I was a supervisor for

1 A. So . . .

2 Q. Okay.

3 A. I don't know how to answer that.

4 Q. That's fine.

5 Okay. So after that job, what was your next job  
6 after, after that one?

7 A. I asked for -- my mom got sick, so I asked -- I  
8 didn't want to leave Refugee Affairs Division. That's  
9 actually a dream job. But I had to ask for a transfer to  
10 Seattle USCIS.

11 Q. Okay. I'm sorry to hear that your mother wasn't  
12 well.

13 And is that your current job?

14 A. Yeah. So I'm a senior immigration officer, an  
15 ISO-III, in Seattle.

16 Q. Okay. And how long have you been in your current  
17 position, then?

18 A. Since January 2017.

19 Q. And what are your responsibilities in your current  
20 position?

21 A. They vary. Senior immigration officers tend to be  
22 very different in different offices, and they're very  
23 different in my office. I don't do the same thing as any of  
24 the other senior officers. We all tend to do something  
25 different.

1 VIDEOPHOTOGRAPHER: 5:34 p.m., we're back on the  
2 record.

3

4 EXAMINATION

5 BY MS. BRAGA:

6 Q. Nadia, I wanted to follow up with you.

7 MS. BRAGA: Actually, can we put on the record  
8 that Plaintiffs' counsel is done with questioning?

9 MS. WHIDBEE: Yes. That's all the questions I  
10 have for now.

11 MS. BRAGA: Thank you.

12 Q. (By Ms. Braga) Nadia, I have some follow-up  
13 questions on some things that you were asked about earlier.  
14 Earlier today, you testified that when you were working in  
15 the San Francisco field office, you were tasked with  
16 reviewing files in a basement and, specifically, with  
17 removing files from boxes when the files were for  
18 individuals who had Arabic-sounding names. Do you recall  
19 that testimony?

20 A. Yeah.

21 Q. During what time period did you perform that work?

22 A. It was soon after I started working there, so it  
23 was 2002.

24 Q. And what years were you assigned to the  
25 San Francisco field office?

1 A. 2002 to 2007.

2 Q. Okay. And since that time that you just mentioned  
3 in 2002, have you ever been asked to treat immigrant  
4 benefits applicants differently than other applicants based  
5 on an applicant having an Arabic name?

6 A. No.

7 Q. You mentioned earlier today that an officer in the  
8 Seattle field office [REDACTED] had said derogatory  
9 things about Middle Eastern Africans. Do you remember that  
10 testimony?

11 A. Yes.

12 Q. Does he work on CARRP cases?

13 A. No, he doesn't.

14 Q. Are you aware of any officers in the Seattle field  
15 office who work on CARRP cases making derogatory comments  
16 about individuals from the Middle East?

17 A. No, not at all.

18 Q. You also testified earlier today that, in response  
19 to questions about law enforcement training, that you went  
20 to something called basic?

21 A. Mm-hm.

22 Q. What did you mean when you referred to basic as  
23 law enforcement training?

24 A. It was at the law enforcement training center in  
25 Brunswick, Georgia.