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7 *Attorneys for Defendants*

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO-OAKLAND DIVISION

10 AMERICAN CIVIL LIBERTIES
 11 UNION FOUNDATION, *et al.*,

12 *Plaintiffs,*

13 v.

14 DEPARTMENT OF JUSTICE, *et al.*,

15 *Defendants.*

Case No. 19-CV-00290-EMC

NOTICE OF FILING

16
 17 Defendants hereby notify this Court that Defendant U.S. Citizenship &
 18 Immigration Services has reprocessed two pages of its production after further
 19 review. The reprocessed pages are at issue in the parties' pending partial summary-
 20 judgment motion. As such, Defendants include the reprocessed pages in the
 21 attached exhibit.

22 Respectfully submitted,

23 DATED: September 20, 2021

24 BRIAN M. BOYNTON
 Acting Assistant Attorney General

25 ELIZABETH J. SHAPIRO (D.C. Bar No.
 418925)
 26 Deputy Branch Director

27 /s/ Vinita Andrapalliyal
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Shirk, Georgette L

From: Gentry, Anthony E
Sent: Monday, April 09, 2018 8:13 AM
To: Gaffin, Elizabeth S; Quinn, Kevin T; Brown, Sara C
Subject: RE: DHS procurement of SM services in Enhanced Vetting initiative

Regarding the CDT letter...noted with interest, not much.

From: Gaffin, Elizabeth S
Sent: Monday, April 09, 2018 9:00 AM
To: Quinn, Kevin T; Brown, Sara C
Cc: Gentry, Anthony E
Subject: RE: DHS procurement of SM services in Enhanced Vetting initiative

(b)(5) And apparently the [redacted] wonder what it does with sarcasm, my second language

Elizabeth Gaffin
USCIS Office of the Chief Counsel

[redacted]

(b)(6)

From: Quinn, Kevin T
Sent: Monday, April 09, 2018 8:55 AM
To: Gaffin, Elizabeth S; Brown, Sara C
Cc: Gentry, Anthony E
Subject: RE: DHS procurement of SM services in Enhanced Vetting initiative

"...probability of becoming a positively contributing member of society..."

...based on social media.

HAHAHAHAHAHAHAHAHAHAHAHA.

K

Kevin T. Quinn
USCIS - Fraud Detection and National Security
Chief – Social Media Division

[redacted]

(b)(6)

From: Gaffin, Elizabeth S
Sent: Monday, April 09, 2018 8:53 AM
To: Quinn, Kevin T; Brown, Sara C
Cc: Gentry, Anthony E
Subject: RE: DHS procurement of SM services in Enhanced Vetting initiative

From CDT's letter

In July 2017, DHS held an industry day to pursue a contract to automate the current manual process of screening applicants for entry to the United States and immigration benefits as well as the process of creating deportation leads.² In February 2018, DHS announced that it is moving forward with this contract following a closed procurement process.³ The contractor would be responsible for "exploit[ing]" information from sources such as social media websites, blogs, conferences, and academic websites.⁴ The contractor would be required to use automated processes to generate 10,000 investigative leads annually, to evaluate applicants' "probability of becoming a positively contributing member of society as well as their ability to contribute to the national interests," and to "assess whether an applicant intends to commit criminal or terrorist acts after entering the United States."⁵

Elizabeth Gaffin
USCIS Office of the Chief Counsel

[Redacted]

(b)(6)

From: Quinn, Kevin T
Sent: Monday, April 09, 2018 8:39 AM
To: Gaffin, Elizabeth S; Brown, Sara C
Cc: Gentry, Anthony E
Subject: RE: DHS procurement of SM services in Enhanced Vetting initiative

I was not aware of... whatever that email is. But the system they're talking about is

[Redacted]

[Redacted]

(b)(5)

K

Kevin T. Quinn
USCIS - Fraud Detection and National Security
Chief – Social Media Division

[Redacted]

(b)(6)

From: Gaffin, Elizabeth S
Sent: Monday, April 9, 2018 8:24 AM
To: Brown, Sara C [Redacted] Quinn, Kevin T [Redacted]
Cc: Gentry, Anthony E [Redacted]
Subject: DHS procurement of SM services in Enhanced Vetting initiative

(b)(6)

<https://cdt.org/insight/weighing-in-on-the-dhs-visa-lifecycle-vetting-initiative/>

You are probably already aware of this

Elizabeth Gaffin
USCIS Office of the Chief Counsel

[Redacted]

(b)(6)