


4. Through the exercise of my official duties, I also have been briefed on the above-captioned lawsuit in which the Court has certified two classes of individuals seeking legal permanent resident status or naturalization. I understand that this matter is proceeding in discovery and that Plaintiffs have served document requests on the Defendants. I have been advised the Defendants have responded to the document requests and asserted objections over privileged information and documents. I also understand that a motion for sanctions has been filed against Defendants based upon USCIS' decision to withhold information from the USCIS A-files pertaining to the named Plaintiffs.

5. As explained in more detail in my declaration submitted *ex parte, in camera*, the FBI asserts the law enforcement and deliberative process privileges over FBI information contained in the A-files and any other USCIS records pertaining to the five named Plaintiffs in this civil action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of April, 2018.



Carl Ghattas
Executive Assistant Director
National Security Branch
Federal Bureau of Investigation
Washington, D.C.