

The Honorable Richard A. Jones

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*,
Plaintiffs,
v.
UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, *et al.*,
Defendants.

No. 2:17-cv-00094-RAJ

**AFFIDAVIT OF MATTHEW D.
EMRICH IN SUPPORT OF
ASSERTION OF THE
DELIBERATIVE PROCESS
PRIVILEGE**

I, Matthew D. Emrich, do hereby declare and say:

1. I am the Associate Director of the Fraud Detection and National Security (“FDNS”) Directorate, U.S. Citizenship and Immigration Services (“USCIS”), Department of Homeland Security. As the leader of FDNS, I report directly to the Director, USCIS and Deputy Director, USCIS.

2. L. Francis Cissna, Director of USCIS, has delegated to me the authority to assert the deliberative process privilege on his behalf regarding the documents at issue in this litigation.

3. As the FDNS Associate Director, I am responsible for overseeing all policy, planning, management, and execution functions for FDNS. FDNS’s mission is to enhance the integrity of the legal immigration system by leading USCIS’s efforts to identify threats to national security and public safety, detect and combat immigration benefit fraud, and remove systemic and other vulnerabilities. I have held this position since November 15, 2015.

1 4. Under my supervision, USCIS's FDNS leads USCIS's efforts to determine
2 whether individuals or organizations filing for immigration benefits pose a threat to national
3 security, public safety, or the integrity of the nation's immigration system. As part of its duties,
4 FDNS establishes guidance and oversees the process for identifying, reviewing, and vetting
5 immigration benefit applications, petitions, and requests ("applications") that involve national
6 security concerns. FDNS personnel work closely with USCIS adjudicators to resolve such cases
7 and to provide adjudicators with sufficient information for the adjudicators to determine whether
8 an applicant, petitioner, or requestor ("applicant") is eligible for the benefit sought. To fulfill its
9 mission, FDNS collaborates with counterparts across USCIS, DHS, and the broader U.S.
10 government. FDNS also serves as the agency's conduit for sharing information with law
11 enforcement and intelligence community partners.

12 5. I submit this declaration in order to assert the deliberative process privilege over
13 documents previously withheld or redacted on that basis.

14 6. Public disclosure of the withheld portions of these documents would jeopardize
15 USCIS's ability to engage in decision making by discouraging future candid discussion and
16 debate within USCIS. USCIS personnel would be reluctant to share their opinions for or against
17 a particular decision if those predecisional comments were subject to disclosure, and to future
18 use for the purpose of challenging the final decision and/or the process by which it was achieved.
19 It is reasonable to expect that, if the court elects to make these deliberations and discussion
20 public, it will influence the future actions of USCIS personnel, to the detriment of the decision
21 making process, and the ability to make well informed decisions at USCIS.

22 7. I am aware that in this litigation the parties have entered into a Stipulated
23 Protective Order, ECF No. 85, and I have reviewed the terms of this Stipulated Protective Order.
24 The existence of the protective order does not change my assessment of the importance of
25 shielding these internal predecisional agency deliberations from disclosure. Even disclosure
26 under a protective order would not mitigate the chilling effect and detrimental consequences that
27 would result from these documents being disclosed for purposes of this litigation.
28

1 8. The Afile documents withheld in this case on the basis of the deliberative process
2 privilege are documents prepared by USCIS personnel to assist in the adjudication of
3 applications for immigration benefits. In this case that includes naturalization applications, and
4 applications to adjust status. The documents include worksheets, notes, emails, other such
5 documents reflecting the efforts of USCIS personnel to assess eligibility for these benefits in
6 advance of reaching a decision. They reflect the thoughts, opinions, suggestions, and
7 recommendations of the drafter, as well as efforts to resolve question with supervisors and
8 colleagues, rather than agency policy. These documents are predecisional because they were
9 created before a final decision was rendered and in furtherance of reaching that decision, and
10 they are deliberative because their purpose is to assist in evaluating eligibility.

11 9. I am asserting the deliberative process privilege over the following pages from the
12 Manzoor Afile, DEF-0000: 5774; 5777; 5778; 5779; 5796 to 5799; 5819 to 5820; 5886; 5906;
13 5963; 6004; 6024; 6074; 6261; 6262; 6267 to 6273; 6274 to 6277; 6278 to 6280; 6281 to 6282;
14 6292 to 6293; 6295; 6313 to 6314; 6315; 6316 to 3617; 6323; 6324 to 6326; 6327 to 6332; 6333;
15 6334 to 6336; 6337; 6338; 6339 to 6343; 6349; 6350 to 6351.

16 10. I am asserting the deliberative process privilege over the following pages from the
17 Wagafe Afile, DEF-0000: 6572; 6580; 6585; 6590; 6591; 6592; 6593 to 6597; 6598 to 6599;
18 6605 to 6606; 6607; 6673; 6676 to 6677; 6710.

19 11. I am asserting the deliberative process privilege over the following pages from the
20 Jihad Afile, DEF-0000: 7674; 7676; 7688 to 7689; 7691; 7733 to 7736; 7738; 7739; 7740; 7741
21 to 7743; 7780 to 7782; 7783; 7785 to 7786; 7787 to 7805; 7819 to 7821; 7822; 7823 to 7825;
22 7828 to 7829; 7858 to 7859; 7860; 7870 to 7871.

23 12. I am asserting the deliberative process privilege over the following pages from the
24 Bengezi Afile, DEF-0000: 6936 to 6953; 7311; 7312; 7321; 7322 to 7323; 7346 to 7348; 7349 to
25 7351; 7352; 7353; 7354 to 7356; 7357 to 7358; 7367 to 7369; 7371 to 7381; 7382 to 7383; 7385;
26 7393; 7404 to 7405; 7440 to 7446.

27 13. I am asserting the deliberative process privilege over the following pages from the
28 Ostadhassan Afile, DEF-0000: 8470 to 8471; 8472 to 8473; 8474; 8475; 8476; 8480; 8483;

1 8484; 8485; 8488 to 8495; 8507 to 8508; 8510; 8511 to 8514; 8516; 8517 to 8519; 8521; 8522 to
2 8523; 8524 to 8525; 8526 to 8532; 8534; 8550 to 8551; 8563 to 8568; 8593; 8594 to 8595.

3 14. In addition, my review of the other documents identified herein, which were
4 withheld in this case on the basis of the deliberative process privilege, demonstrated that they are
5 predecisional and deliberative documents. As further described below, the nature of the
6 documents over which I am declaring the deliberative process privilege includes documents
7 reflecting deliberation about policies and procedures being considered for development or
8 revision. They also reflect deliberations about how to apply, implement, or teach personnel
9 about USCIS policies and procedures. Further, they reflect management decision making
10 processes and the exchange of guidance, advice, and direction. They are documents, emails,
11 notes, and other documents in draft and other forms, reflecting the candid and collaborative
12 exchange of comments and information reflecting the types of discussions and decision making
13 processes that are necessary to the functioning of an agency like USCIS.

14 15. The following are predecisional, deliberative documents relate to the drafting,
15 review, and editing of the policy memorandum on instituting "Just in Time" background and
16 security checks immediately before granting naturalization or lawful permanent resident status.
17 The documents below include intra agency emails and comments and draft policy memoranda,
18 reflecting the process of review and deliberation that occurred in advance of the finalization of
19 the policy memorandum. DEF-00016317 to DEF-00016318; DEF-00011135; DEF-00011460;
20 DEF-00011139 to DEF-00011140; DEF-00011161 to DEF-00011162; DEF-00011166 to DEF-
21 00011167; DEF-00011435 to DEF-00011436; DEF-00011584 to DEF-00011588; DEF-
22 00011599 to DEF-00011603; DEF-00011569 to DEF-00011573; DEF-00011394 to DEF-
23 00011396; DEF-00011397 to DEF-00011399; DEF-00011410 to DEF-00011413; DEF-
24 00011414 to DEF-00011416; DEF-00011417 to DEF-00011419; DEF-00011420 to DEF-
25 00011421; DEF-00011422 to DEF-00011423; DEF-00011426 to DEF-00011427; DEF-
26 00011430 to DEF-00011431; DEF-00011440 to DEF-00011441; DEF-00011444 to DEF-
27 00011445; DEF-00011448 to DEF-00011449; DEF-00011450 to DEF-00011451; DEF-
28 00011452 to DEF-00011455; DEF-00011456 to DEF-00011459; DEF-00011614 to DEF-

1 00011618; DEF-00011629 to DEF-00011633; DEF-00011554 to DEF-00011558; DEF-
2 00011400 to DEF-00011403; DEF-00011432 to DEF-00011434; DEF-00011559 to DEF-
3 00011562; DEF-00011574 to DEF-00011577; DEF-00011589 to DEF-00011592; DEF-
4 00011604 to DEF-00011607; DEF-00011619 to DEF-00011622; DEF-00011634 to DEF-
5 00011637; DEF-00016319 to DEF-00016326; DEF-00011138; DEF-00011143; DEF-00011165;
6 DEF-00011170; DEF-00011439; DEF-00011463; DEF-00016327; DEF-00010891

7 16. The following documents reflect predecisional USCIS policy deliberation in the
8 context of a CARRP related working group tasked with review, discussion, debate, revision, and
9 development of agency CARRP policy and procedure. The documents below include emails,
10 working aids, notes, memoranda, agenda containing directions and comments, as well as draft
11 documents submitted to or by participants in the working group. The revision of CARRP that
12 was the subject of this working group was never implemented. DEF-00000104 to DEF-
13 00000107; DEF-00000100 to DEF-00000103; DEF-00000108 to DEF-00000115; DEF-
14 00000116 to DEF-00000123; DEF-00000124 to DEF-00000131; DEF-00000132 to DEF-
15 00000139; DEF-00000140 to DEF-00000147; DEF-00000148 to DEF-00000155; DEF-
16 00000156 to DEF-00000163; DEF-00000164 to DEF-00000171; DEF-00000179 to DEF-
17 00000185; DEF-00000172 to DEF-00000178; DEF-00000187 to DEF-00000190; DEF-
18 00000491 to DEF-00000495; DEF-00001069 to DEF-00001073; DEF-00000496; DEF-
19 00000497; DEF-00000498; DEF-00000499; DEF-00000500; DEF-00000501; DEF-00000502;
20 DEF-00000503; DEF-00000504; DEF-00000505; DEF-00000506; DEF-00000507; DEF-
21 00000508; DEF-00000509; DEF-00000510; DEF-00000511; DEF-00000512; DEF-00000513;
22 DEF-00000514; DEF-00000515; DEF-00000516; DEF-00000517; DEF-00000518; DEF-
23 00000519; DEF-00000520; DEF-00000521; DEF-00000522; DEF-00000523; DEF-00000524;
24 DEF-00000211 to DEF-00000212; DEF-00000213 to DEF-00000215; DEF-00000216 to DEF-
25 00000217; DEF-00000218 to DEF-00000220; DEF-00000221 to DEF-00000222; DEF-
26 00000223 to DEF-00000224; DEF-00000225 to DEF-00000226; DEF-00000227 to DEF-
27 00000228; DEF-00000229 to DEF-00000230; DEF-00000231 to DEF-00000233; DEF-
28 00000234 to DEF-00000235; DEF-00000236 to DEF-00000237; DEF-00000238 to DEF-

1 0000240; DEF-0000244 to DEF-0000246; DEF-0000247 to DEF-0000248; DEF-
2 0000249 to DEF-0000250; DEF-0000251 to DEF-0000252; DEF-0000253 to DEF-
3 0000254; DEF-0000255 to DEF-0000256; DEF-0000257 to DEF-0000258; DEF-
4 0000259 to DEF-0000261; DEF-0000262 to DEF-0000265; DEF-0000266 to DEF-
5 0000268; DEF-0000269 to DEF-0000271; DEF-0000272 to DEF-0000273; DEF-
6 0000274 to DEF-0000275; DEF-00005515; DEF-00005528 to DEF-00005530; DEF-
7 00005506 to DEF-00005507; DEF-00005510 to DEF-00005510; DEF-00010750 to DEF-
8 00010750; DEF-00002876 to DEF-00002879;

9 17. USCIS policy and procedure is memorialized in, among other things, policy
10 memoranda and guidance. The documents below reflect the process of USCIS's efforts to
11 generate, review, and/or revise policy and procedure in the form of draft policy memoranda
12 and/or draft policy manual content relating to CARRP and to the handling of cases for which
13 there may be national security concerns. DEF-00002951 to DEF-00002969; DEF-00010894;
14 DEF-00010895; DEF-00010898; DEF-00010899; DEF-00010900; DEF-00010901; DEF-
15 00010902; DEF-00010903; DEF-00011090; DEF-00011091; DEF-00011092; DEF-00011100;
16 DEF-00011101; DEF-00011102; DEF-00011103; DEF-00011109; DEF-00011117; DEF-
17 00011123; DEF-00011124; DEF-00011125; DEF-00011158; DEF-00011174; DEF-00011208;
18 DEF-00011217; DEF-00011219; DEF-00011221; DEF-00011223; DEF-00011224; DEF-
19 00011225; DEF-00011226; DEF-00011227; DEF-00011230; DEF-00011231; DEF-00011232;
20 DEF-00011233; DEF-00011234; DEF-00011238; DEF-00011243; DEF-00011244; DEF-
21 00011247; DEF-00011248; DEF-00011249; DEF-00011250; DEF-00011256; DEF-00011257;
22 DEF-00011258; DEF-00011271; DEF-00011282; DEF-00011283; DEF-00011284; DEF-
23 00011287; DEF-00011288; DEF-00011291; DEF-00011292; DEF-00011312; DEF-00011332;
24 DEF-00011353; DEF-00011356; DEF-00011359; DEF-00011360; DEF-00011363; DEF-
25 00011364; DEF-00011365; DEF-00011368; DEF-00011369; DEF-00011381; DEF-00011382;
26 DEF-00011392; DEF-00016329; DEF-00016330; DEF-00011126 to DEF-00011131; DEF-
27 00011132 to DEF-00011133; DEF-00011259 to DEF-00011264; DEF-00011265 to DEF-
28 00011266; DEF-00011294 to DEF-00011311; DEF-00011314 to DEF-00011331; DEF-

1 00011334 to DEF-00011352; DEF-00011228 to DEF-00011229; DEF-00008673 to DEF-
2 00008690; DEF-00011216; DEF-00011218; DEF-00011220; DEF-00011222; DEF-00016584 to
3 DEF-00016586; DEF-00000486 to DEF-00000490; DEF-00002880 to DEF-00002884; DEF-
4 00005502 to DEF-00005503; DEF-00000762 to DEF-00000779; DEF-00000432 to DEF-
5 00000449; DEF-00002822 to DEF-00002839; DEF-00000450 to DEF-00000467; DEF-
6 00002840 to DEF-00002857; DEF-00000468 to DEF-00000485; DEF-00002858 to DEF-
7 00002875; DEF-00000817 to DEF-00000834; DEF-00000617 to DEF-00000628; DEF-
8 00000629 to DEF-00000647; DEF-00000648 to DEF-00000666; DEF-00000714 to DEF-
9 00000728; DEF-00000667 to DEF-00000681; DEF-00000866 to DEF-00000879; DEF-
10 00000853 to DEF-00000865; DEF-00000682 to DEF-00000698; DEF-00000699 to DEF-
11 00000713; DEF-00000729 to DEF-00000744; DEF-00000745 to DEF-00000761; DEF-
12 00000780 to DEF-00000797; DEF-00000798 to DEF-00000816; DEF-00000835 to DEF-
13 00000852; DEF-00000880 to DEF-00000897; DEF-00000536 to DEF-00000553; DEF-
14 00002889 to DEF-00002906; DEF-00000596 to DEF-00000613; DEF-00000898 to DEF-
15 00000912; DEF-00000913 to DEF-00000929; DEF-00000930 to DEF-00000941; DEF-
16 00000942 to DEF-00000953; DEF-00000954 to DEF-00000965; DEF-00002910 to DEF-
17 00002928; DEF-00002933 to DEF-00002950; DEF-00000209 to DEF-00000210;

18 18. For purposes of reviewing certain cases in which national security concerns have
19 been raised, USCIS established a Senior Leadership Review Board (SLRB) and an associated
20 working group. It was necessary to develop guidance describing the roles and responsibilities of
21 the board and its members, and to establish procedures and processes related to the board's work.
22 The following documents are predecisional, reflecting the process of review and deliberation that
23 occurred in the context of developing guidance and procedures for the SLRB, and in advance of
24 the adoption or modification of final guidance for the SLRB. DEF-00010897; DEF-00011086;
25 DEF-00011087; DEF-00011088; DEF-00011089; DEF-00011093; DEF-00011097; DEF-
26 00011098; DEF-00011099; DEF-00011104; DEF-00011105; DEF-00011108; DEF-00011110;
27 DEF-00011111; DEF-00011112; DEF-00011113; DEF-00011114; DEF-00011134; DEF-
28 00011144; DEF-00011145; DEF-00011146; DEF-00011147; DEF-00011148; DEF-00011149;

1 DEF-00011150; DEF-00011151; DEF-00011152; DEF-00011153; DEF-00011154; DEF-
2 00011155; DEF-00011156; DEF-00011157; DEF-00011159; DEF-00011160; DEF-00011171;
3 DEF-00011172; DEF-00011173; DEF-00011175; DEF-00011176; DEF-00011177; DEF-
4 00011195; DEF-00011204; DEF-00011205; DEF-00011206; DEF-00011207; DEF-00011213;
5 DEF-00011214; DEF-00011215; DEF-00011246; DEF-00011383; DEF-00011468; DEF-
6 00011471; DEF-00011491; DEF-00011505; DEF-00011514; DEF-00011519; DEF-00008643 to
7 DEF-00008672; DEF-00010508 to DEF-00010537; DEF-00016542 to DEF-00016563; DEF-
8 00016568; DEF-; DEF-00016570; DEF-00010744 to DEF-00010745; DEF-00010768 to DEF-
9 00010770; DEF-00010506; DEF-00016540; DEF-00011180 to DEF-00011183; DEF-00011186
10 to DEF-00011188; DEF-00011192 to DEF-00011194; DEF-00011196 to DEF-00011199; DEF-
11 00011476 to DEF-00011478; DEF-00011481 to DEF-00011484; DEF-00011488 to DEF-
12 00011490; DEF-00011492 to DEF-00011495; DEF-00011502 to DEF-00011504; DEF-
13 00011506 to DEF-00011509.

14 19. The following draft documents are predecisional reflect USCIS's efforts to create
15 or revise policy related to USCIS's use of TECS background checks. DEF-00001272 to DEF-
16 00001275; DEF-00001276 to DEF-00001279; DEF-00001280 to DEF-00001283; DEF-
17 00001284 to DEF-00001288; DEF-00001098 to DEF-00001102; DEF-00001222 to DEF-
18 00001226; DEF-00001315 to DEF-00001319; DEF-00005481 to DEF-00005482; DEF-
19 00005491; DEF-00003273 to DEF-00003278; DEF-00003279 to DEF-00003282; DEF-
20 00004045 to DEF-00004063; DEF-00016587.

21 20. The following documents reflect USCIS's predecisional and deliberative efforts
22 to revise sections of the National Background Identity and Security Operation Procedures
23 (NaBISCOP). The NaBISCOP is considered a living document and is updated as the need
24 arises. Evaluation of potential changes to the procedures requires candid discussion and
25 deliberation within the agency. DEF-00003301 to DEF-00003302; DEF-00005517 to DEF-
26 00005518; DEF-00003005 to DEF-00003006; DEF-00011028 to DEF-00011029; DEF-
27 00002653 to DEF-00002666; DEF-00003045 to DEF-00003049; DEF-00003052 to DEF-
28 00003053; DEF-00003054 to DEF-00003063; DEF-00003246 to DEF-00003247; DEF-

1 00003248 to DEF-00003249; DEF-00001106 to DEF-00001109; DEF-00001110; DEF-
2 00002998 to DEF-00003002; DEF-00003038; DEF-00003236 to DEF-00003237; DEF-
3 00003250 to DEF-00003252; DEF-00003271 to DEF-00003272; DEF-00001105; DEF-
4 00001220 to DEF-00001221; DEF-00003003 to DEF-00003004; DEF-00001217; DEF-
5 00003009 to DEF-00003013; DEF-00001088; DEF-00001111 to DEF-00001115; DEF-
6 00001089 to DEF-00001091; DEF-00003039 to DEF-00003041; DEF-00003050 to DEF-
7 00003051; DEF-00001218 to DEF-00001219; DEF-00010896; DEF-00010912; DEF-00010959;
8 DEF-00010960; DEF-00010961; DEF-00010962; DEF-00010963; DEF-00010964; DEF-
9 00010965; DEF-00010966; DEF-00010967; DEF-00010968; DEF-00010969; DEF-00010970;
10 DEF-00010971; DEF-00010972; DEF-00010975; DEF-00010989; DEF-00010990; DEF-
11 00011002; DEF-00011005; DEF-00011006; DEF-00011024; DEF-00011050; DEF-00011051;
12 DEF-00011063; DEF-00011073; DEF-00011080; DEF-00011081; DEF-00011082; DEF-
13 00011083; DEF-00011084; DEF-00011085; DEF-00011096; DEF-00011116; DEF-00011122;
14 DEF-00011242; DEF-00011255; DEF-00011286; DEF-00011355; DEF-00011391; DEF-
15 00011393; DEF-00009263 to DEF-00009429; DEF-00009430 to DEF-00009597; DEF-
16 00009598 to DEF-00009764; DEF-00008924 to DEF-00009091; DEF-00009092 to DEF-
17 00009254; DEF-00009800 to DEF-00009954; DEF-00008764 to DEF-00008923; DEF-
18 00003064 to DEF-00003235; DEF-00001229 to DEF-00001229; DEF-00001230 to DEF-
19 00001231; DEF-00001116 to DEF-00001132; DEF-00003792 to DEF-00003975; DEF-
20 00001103 to DEF-00001104; DEF-00001206 to DEF-00001216; DEF-00003303 to DEF-
21 00003304; DEF-00003308 to DEF-00003309; DEF-00003315 to DEF-00003316; DEF-
22 00003317 to DEF-00003318; DEF-00002970; DEF-00003014 to DEF-00003037; DEF-
23 00010978 to DEF-00010988; DEF-00011034 to DEF-00011049; DEF-00003288 to DEF-
24 00003290; DEF-00003297 to DEF-00003299; DEF-00011010 to DEF-00011011; DEF-
25 00010999 to DEF-00011001; DEF-00011027; DEF-00010991 to DEF-00010992; DEF-
26 00010995; DEF-00010996; DEF-00010997 to DEF-00010998; DEF-00011060 to DEF-
27 00011062; DEF-00011094 to DEF-00011095; DEF-00011267 to DEF-00011268; DEF-
28 00011269 to DEF-00011270; DEF-00011390; DEF-00011057 to DEF-00011059; DEF-

1 00000425 to DEF-00000431; DEF-00002815 to DEF-00002821; DEF-00000276 to DEF-
2 00000302; DEF-00002668 to DEF-00002694; DEF-00000303 to DEF-00000329; DEF-
3 00002695 to DEF-00002721; DEF-00000554 to DEF-00000595; DEF-00000330 to DEF-
4 00000346; DEF-00002722 to DEF-00002738; DEF-00000373 to DEF-00000398; DEF-
5 00002764 to DEF-00002789; DEF-00000399 to DEF-00000424; DEF-00002790 to DEF-
6 00002814; DEF-00000347 to DEF-00000372; DEF-00002739 to DEF-00002763; DEF-
7 00000097; DEF-00001050; DEF-00000614 to DEF-00000616; DEF-00001039; DEF-00002907
8 to DEF-00002909; DEF-00002929.

9 21. The following documents reflect the predecisional course of USCIS policy
10 deliberation in the context of a NaBISCOP advisory panel, tasked with review, discussion,
11 debate, revision, and development of agency operating procedures for background, identity and
12 security checks. DEF-00003238; DEF-00002667; DEF-00001133; DEF-00001134; DEF-
13 00001135; DEF-00003239 to DEF-00003241; DEF-00001142 to DEF-00001145; DEF-
14 00001146 to DEF-00001147; DEF-00001148 to DEF-00001150; DEF-00001151 to DEF-
15 00001152; DEF-00001153 to DEF-00001156; DEF-00001157 to DEF-00001159; DEF-
16 00001160 to DEF-00001161; DEF-00001162 to DEF-00001163; DEF-00001164 to DEF-
17 00001166; DEF-00001167 to DEF-00001169; DEF-00001170 to DEF-00001171; DEF-
18 00001172 to DEF-00001174; DEF-00001175 to DEF-00001176; DEF-00001177 to DEF-
19 00001178; DEF-00001179 to DEF-00001181; DEF-00001182 to DEF-00001184; DEF-
20 00001185 to DEF-00001187; DEF-00001188 to DEF-00001189; DEF-00001190 to DEF-
21 00001191; DEF-00001192 to DEF-00001193; DEF-00001194 to DEF-00001197; DEF-
22 00001198 to DEF-00001199; DEF-00001200 to DEF-00001201; DEF-00001202 to DEF-
23 00001203; DEF-00001204 to DEF-00001205; DEF-00003242 to DEF-00003243; DEF-
24 00003244 to DEF-00003245

25 22. USCIS engages in data exchange and collaboration with other DHS components,
26 for example Customs and Border Protection, for purposes of vetting and adjudicating certain
27 immigration benefit applications. The following documents are drafts of weekly reports
28 generated in power point related to collaborative data exchange and application vetting and

1 review. These documents are predecisional in that they are not final versions of these reports,
2 and further because they are used to inform the ongoing development and implementation
3 USCIS's policies and procedures relating to how this data is used. They are also deliberative.
4 They reflect work that is intended to facilitate candid discussion within the agency about policy
5 and procedure. DEF-00011794; DEF-00011795; DEF-00011796; DEF-00011797; DEF-
6 00011799; DEF-00011800; DEF-00011801; DEF-00011802; DEF-00011803; DEF-00011804;
7 DEF-00011805; DEF-00011806; DEF-00011807; DEF-00011808; DEF-00011809; DEF-
8 00011810; DEF-00011811; DEF-00011812; DEF-00011813; DEF-00011814.

9 23. USCIS established the Screening Coordination Working Group (SCWG) as a
10 forum for the discussion of screening, background check, and hit resolution issues among USCIS
11 offices responsible for screening and support. The SCWG is tasked with identifying areas of
12 concern related to screening policies and practices, ensuring coordination and consistency within
13 USCIS and with DHS screening processes, and identifying and developing new policies and
14 practices for screening and information sharing. The following predecisional documents reflect
15 review, comment, or further proposed policy or procedural development from the SCWG.
16 DEF-00001289 to DEF-00001290; DEF-00001291 to DEF-00001292; DEF-00001293 to DEF-
17 00001294; DEF-00001295 to DEF-00001297; DEF-00001298 to DEF-00001299; DEF-
18 00001300 to DEF-00001301; DEF-00001302 to DEF-00001304; DEF-00001305 to DEF-
19 00001306; DEF-00001307 to DEF-00001308; DEF-00001309 to DEF-00001310; DEF-
20 00001311 to DEF-00001312; DEF-00001313 to DEF-00001314; DEF-00001320 to DEF-
21 00001336; DEF-00001337 to DEF-00001347; DEF-00001250 to DEF-00001268; DEF-
22 00004064 to DEF-00004102;

23 24. These are predecisional draft documents reflecting USCIS's efforts to procure
24 training for USCIS officers in interviewing techniques related to CARRP. They reflect the
25 candid internal process of editing and commenting that is necessary to the collaborative efforts of
26 agency personnel tasked with this procurement. DEF-00014823; DEF-00014824; DEF-
27 00014825; DEF-00014826; DEF-00014827; DEF-00014828; DEF-00014829; DEF-00014858;
28 DEF-00014821; DEF-00014830; DEF-00014822

1 25. This document is a draft of USCIS guidance regarding personnel tasked to work
2 with the Joint Terrorism Task Force (JTTF). This version contains edits, comments, and other
3 indicia of a collaborative internal review process involving multiple editors. It is predecisional
4 and deliberative. DEF-00010891

5 26. This 2016 email exchange reflects efforts to evaluate a question from training
6 related to TECS. The exchange includes advice and suggestions shared internally and for
7 purposes of providing a response, and proposing ways to improve the training. It is predecisional
8 and deliberative. DEF-00010771 to DEF-00010772

9 27. This 2017 email exchange reflects a series of questions regarding efforts to
10 prepare for a meeting to discuss USCIS background checks and efforts to meet agency goals.
11 The exchange includes answers to the questions and comments regarding internal processes and
12 issues. This email exchange reflects information shared internally and for purposes of guiding
13 decisions and actions. It is predecisional and deliberative. DEF-00010763 to DEF-00010767

14 28. This 2013 draft document reflects options for implementing process changes
15 regarding national security cases at USCIS. This draft document contains edits, comments, and
16 other indicia of an ongoing collaborative editing and review process. It is predecisional and
17 deliberative. DEF-00011379 (also DEF-00017065)

18 29. These 2017 email exchanges regard the collaborative review of comments and
19 edits related to new agency policy. They reflect issues raised by reviewers and their comments,
20 and requests for advice and assistance regarding how to proceed. They are predecisional and
21 deliberative. DEF-00011115; DEF-00011289 to DEF-00011290; DEF-00011118 to DEF-
22 00011119; DEF-00011251 to DEF-00011252; DEF-00011354; DEF-00011361 to DEF-
23 00011362; DEF-00011374 to DEF-00011375; DEF-00011239 to DEF-00011240

24 30. This 2010 email exchange reflects a conversation regarding the consequences of a
25 new policy memorandum, posing questions regarding inclusions and omissions in that policy,
26 and engaging in planning for additional work as a consequence. It reflects an internal discussion
27 for purpose of planning future actions and guiding decisions. It is predecisional and
28 deliberative. DEF-00010751 to DEF-00010753.

1 31. This 2017 email exchange reflects a series of status updates, questions, personal
2 assessments, and recommendations for future action regarding a host of pressing issues as
3 between these individuals. It reflects information shared internally and for purposes of guiding
4 decisions and actions. It is predecisional and deliberative. DEF-00010750 to DEF-00010750

5 32. This 2015 draft document was created for purposes of establishing new
6 procedures within FDNS. This draft document contains edits, comments, and other indicia of an
7 ongoing collaborative editing and review process. It is predecisional and deliberative. DEF-
8 00010481 to DEF-00010487

9 33. This 2015 email exchange reflects the circulation of documents with a request for
10 review and comment, and includes guidance regarding the nature of the comment and review
11 being requested. This email exchange further documents and discusses the responses received,
12 and the action necessary to be taken thereafter in furtherance of stated goals. This email
13 exchanges reflects an ongoing collaborative review and response process. It is predecisional and
14 deliberative. DEF-00010760 to DEF-00010762

15 34. This 2013 email exchange among USCIS personnel reflects a request for
16 information and assistance in furtherance of efforts to develop or improve case processing. It
17 also discusses personal opinions and concerns regarding matters affecting USCIS priorities, as
18 well as efforts to explore changes in policy. It is predecisional and deliberative. DEF-00010471
19 to DEF-00010472

20 35. This 2014 document is a draft of an FDNS Office of Liaison Activity Report.
21 This draft document reflects assessments of the role of the Office of Liaison, and provides
22 analysis and recommendations regarding additional work that needs to be done. It is
23 predecisional and deliberative. DEF-00010443 to DEF-00010470

24 36. These 2007 documents are drafts of the FDNS Interagency Border Inspection
25 System (IBIS) Standard Operating Procedure and an associated appendix. They contain
26 comments, edits, highlighting, and questions, reflecting an ongoing collaborative internal review
27 process. These are predecisional deliberative documents. DEF-00010362 to DEF-00010442;
28 DEF-00010538 to DEF-00010733

1 37. These are 2010 and 2011 documents created for USCIS that describe the
2 development of CARRP web based training, including the scope of the project, final
3 deliverables, general design considerations, content outlines, and other information reflecting the
4 planned development and implementation of training. DEF-00010195 to DEF-00010255; DEF-
5 00010256 to DEF-00010335

6 38. This is a draft of a 2009 document created to inform leadership of the reports that
7 FDNS planned to generate on a monthly basis using the Fraud Detection and National Security
8 Data System. This version contains edits, comments, and other indicia of a collaborative internal
9 review process involving multiple editors. It is predecisional and deliberative. DEF-00009260 to
10 DEF-00009262

11 39. This is a draft of a 2008 document created to provide information regarding
12 USCIS national security screening tools. This version contains edits and proposed changes from
13 multiple editors reflecting an ongoing collaborative internal process of review. It is
14 predecisional and deliberative. DEF-00009257 to DEF-00009259

15 40. This document reflects suggested names for to the revision and consolidation of
16 CARRP policy that was not implemented. They are proposals from an individual USCIS
17 employee. They do not reflect any final decision. DEF-00005648

18 41. These documents reflect a series of USCIS draft org charts regarding specific
19 offices and subdivisions of USCIS, including the National Security Branch, FDNS, the Office
20 and Intelligence and Analysis, and USCIS as a whole. DEF-00010865 to DEF-00010870; DEF-
21 00010877 to DEF-00010882; DEF-00010890 to DEF-00010890; DEF-00010883 to DEF-
22 00010883; DEF-00010884 to DEF-00010889; DEF-00010871 to DEF-00010876; DEF-
23 00004931; DEF-00004949; DEF-00004821; DEF-00004937 to DEF-00004938;

24 42. This 2013 email exchange among USCIS personnel reflects further review and
25 discussion of recently-discussed options to improve case processing. It reflects comments and
26 opinions regarding the best option to select for purposes of achieving stated goals, and also
27 references and comments on a document provided for review and editing. Further questions and
28

1 concerns are raised for discussion. This document is predecisional and deliberative. DEF-
2 00005639 (also DEF-00017064)

3 43. This 2016 email exchange between USCIS personnel reflects review and
4 comment on language used to describe data derived from a USCIS system, its limitations, as well
5 as the actual exchange of preliminary data. It is predecisional and deliberative. DEF-00005608
6 to DEF-00005609

7 44. This 2014 email exchange between USCIS personnel reflects discussion and
8 debate regarding the benefits and issues raised by information being exchanged in a report, as
9 well as who should be included as recipients in the distribution of the information. It is
10 predecisional and deliberative. DEF-00005586

11 45. These 2012 draft documents reflect a proposal to modify USCIS CARRP
12 processes and procedures. They describe goals, and present recommendations and analysis to
13 support the proposed goals. These documents do not reflect final agency decisions or actions,
14 but are documents that reflect internal deliberation in furtherance of proposed goals. They are
15 predecisional and deliberative. DEF-00005575 to DEF-00005578; DEF-00005579 to DEF-
16 00005582

17 46. This 2016 email exchange reflects internal discussion regarding reorganization
18 taking place within one part of a USCIS directorate, including various naming proposals, and a
19 request to see if any additional assistance or direction is required. It is predecisional and
20 deliberative. DEF-00005572 to DEF-00005573

21 47. This 2014 email requests the specific reassignment of personnel for purposes of
22 helping to achieve USCIS priorities related to CARRP and improve processes and procedures. It
23 is predecisional and deliberative. DEF-00005537 to DEF-00005538

24 48. This 2015 email reflects an exchange of questions, issues, and discussion
25 regarding how certain features necessary for the referral of national security cases for legal
26 sufficiency review were planned to be incorporated into USCIS's Electronic Immigration System
27 (ELIS). It is predecisional and deliberative. DEF-00005531 to DEF-00005536
28

1 49. This 2017 email reflects an exchange of questions, issues, and guidance regarding
2 USCIS policies and procedures and possible confusion as they relate to interacting with USCIS
3 systems. It is predecisional and deliberative. DEF-00005524 to DEF-00005525

4 50. This 2016 email reflects draft language and collaborative editing of a meeting
5 notice regarding the Screening Coordination Working Group. It is predecisional and
6 deliberative. DEF-00005521 to DEF-00005522

7 51. This is 2015 email exchange between USCIS personnel regarding CARRP
8 training, seeking review and input. It is predecisional and deliberative. DEF-00005509 (also
9 DEF-00016588)

10 52. This is a 2014 email exchange between USCIS personnel regarding CARRP
11 training, proposing changes and improvements to the training. It is predecisional and
12 deliberative. DEF-00005504 to DEF-00005505

13 53. This is a 2016 email exchange between USCIS personnel regarding CARRP
14 questions that had arisen at a meeting relating to best practices and procedures, and seeking
15 guidance from leadership. It is predecisional and deliberative. DEF-00005520 (also DEF-
16 00016599)

17 54. This is a 2014 draft of a USCIS FDNS guidance regarding changes to internal
18 processes and procedures for documenting National Crime Information Center (NCIC) checks in
19 USCIS systems. It contains indicia showing that this draft was proposed change, and not a final
20 memorandum. It is a predecisional deliberative document. DEF-00005472 to DEF-00005479

21 55. This is a 2010 draft of a USCIS FDNS frequently asked questions (FAQ)
22 document regarding CARRP. It contains edits, comments, and other indicia of collaborative
23 review, discussion, editing, and debate. It is a predecisional deliberative document. DEF-
24 00005442 to DEF-00005468

25 56. This is a 2008 draft of a USCIS FDNS document describing USCIS background
26 check policies and procedures. It contains edits, comments, and other indicia of collaborative
27 review, discussion, editing, and debate. It is a predecisional deliberative document. DEF-
28 00005058 to DEF-00005092

1 57. This is a 2008 draft of USCIS FDNS standard operating procedures document
2 describing declassification and the use of classified information in immigration proceedings. It
3 contains edits, comments, and other indicia of collaborative review, discussion, editing, and
4 debate. It is a predecisional deliberative document. DEF-00004991 to DEF-00005025

5 58. This draft internal 2013 presentation describes proposed changes to FDNS
6 systems in furtherance of leadership goals and to improve processing of cases. It is consistent
7 with USCIS's ongoing efforts to review, revise, and improve internal processes and procedures,
8 and reflects the kind of predecisional internal planning and deliberation that is necessary to the
9 proper function of this agency. DEF-00004971 to DEF-00004989

10 59. This 2009 internal review was prepared for the Chief of FDNS. It proposes
11 changes that would affect the structure of the National Security Branch, and includes a proposed
12 plan to implement those changes. It is predecisional and deliberative. DEF-00004919 to DEF-
13 00004923

14 60. This is a 2013 email from a USCIS employee who attended CARRP training
15 directed to a general mailbox where questions were directed. It seeks guidance and clarification
16 regarding matters discussed in the training, and in furtherance of the individual's proper
17 understanding of CARRP policy and procedure, which will be necessary when he or she uses this
18 information to make decisions. It is predecisional and deliberative. DEF-00004401 to DEF-
19 00004401

20 61. This is a draft of a fact sheet for naturalization applicants regarding the security
21 screenings conducted by USCIS. It reflects edits, comments, and other indicia of candid
22 collaborative internal review among USCIS personnel for the purposes of revising and editing
23 consistent with USCIS policy and procedure. This document is predecisional and deliberative.
24 DEF-00005487 to DEF-00005490

25 62. This is a draft of a USCIS presentation prepared to support discussion of possible
26 future enhancements to USCIS's policies and procedures regarding information sharing with law
27 enforcement. It discusses USCIS's current and anticipated procedures and policies related to
28

1 information sharing. It is a predecisional document that is deliberative in nature. DEF-
2 00004034 to DEF-00004042

3 63. This is a predecisional 2015 draft document reflecting proposed revisions to
4 USCIS's TECS Record Creation Standard Operation Procedures. It contains edits, comments,
5 and other indicia of the collaborative review and editing process that is a necessary part of
6 USCIS's internal review of changes to policy and procedures. DEF-00003253 to DEF-00003269

7 64. This is a Field Office Directorate document reflecting the collection of
8 information that various contributors suggest should be included in a standardized memo
9 prepared for purposes of resolving TECS information. It is predecisional and deliberative.
10 DEF-00003045 to DEF-00003049

11 65. This document is a draft of a USCIS FDNS briefing paper from 2011. It was
12 prepared to assist in the briefing of FDNS leadership regarding certain issues related to the
13 vetting of cases being considered by FDNS, identifying possible solutions, and recommending
14 one from among those solutions for possible implementation. It is an unfinished draft. It is
15 predecisional and deliberative. DEF-00003007 to DEF-00003008

16 66. This document is a draft of a USCIS National Benefit Center SOP regarding
17 CARRP referrals. It reflects comments and edits consistent with the process of collaborative
18 review that is necessary to the effective implementation of USCIS policy and procedure. DEF-
19 00001375 to DEF-00001446

20 67. This document is a draft of a paper from April of 2016 that was prepared to assist
21 in the briefing of USCIS senior leadership regarding certain national security issues. It is
22 predecisional and deliberative. DEF-00001371 to DEF-00001373

23 68. These predecisional documents and emails reflect the editing and development of
24 USCIS training regarding cases that may raise national security concerns. They include email,
25 draft word processing documents, and draft power point presentations memorializing the
26 ongoing comment, review, and editing process necessary to the development of this training.
27 DEF-00015004 to DEF-00015005; DEF-00015003; DEF-00015006; DEF-00015007; DEF-
28

1 00015013; DEF-00015014; DEF-00015015; DEF-00015018; DEF-00015019; DEF-00015016;
2 DEF-00015020; DEF-00015000 to DEF-00015002; DEF-00015008 to DEF-00015010;

3 69. These are predecisional documents reflecting the development of annual goals
4 and priorities for FDNS, in furtherance of achieving agency goals, implementing policy,
5 improving processes and procedures, and identifying issues that may require additional attention.
6 These documents reflect the drafting, editing, and revision of FDNS's annual goals, including
7 candid debate and discussion among USCIS personnel regarding that effort. DEF-00005595 to
8 DEF-00005597; DEF-00005598 to DEF-00005604; DEF-00005615 to DEF-00005622; DEF-
9 00005623 to DEF-00005630; DEF-00005631 to DEF-00005638; DEF-00005587 to DEF-
10 00005594; DEF-00010473 to DEF-00010480; DEF-00010740 to DEF-00010741 (also DEF-
11 00016527 to DEF-00016528); DEF-00010742 to DEF-00010743; DEF-00010773 to DEF-
12 00010774; DEF-00016539.

13 70. These are predecisional draft documents that reflect the cooperative internal
14 review and revision processes that are a necessary part of developing and managing training, in
15 furtherance of agency policy objectives. The training in questions regards helping USCIS
16 personnel develop communication skills and strategies necessary for conducting interviews and
17 assessing responses. DEF-00011868; DEF-00011876; DEF-00011869; DEF-00011870; DEF-
18 00011871

19 71. This email discusses the status of an interim policy under consideration at USCIS
20 at the time. The policy had not been adopted and the email relates questions, concerns, and
21 discussion points in anticipation of the potential adoption of the policy. This email and its
22 contents reflect the candid predecisional discussion and debate necessary to the effective
23 implementation of agency policy. DEF-00005480 (also DEF-00016525)

24 72. USCIS creates guidance and standard operating procedure documents for
25 purposes of aiding adjudicators and other officers. This is a predecisional comment draft of a
26 document providing guidance regarding screening and notification issues that may come up
27 during the processing of a case. DEF-00001348 to DEF-00001370
28

1 73. USCIS FDNS officers encounter information that has national security
2 significance in the context of cases they review. USCIS FDNS has developed procedures and
3 policies to guide personnel in that aspect of their work. The following documents are
4 predecisional draft versions of procedural guidance regarding the handling of such information.
5 They contain edits, comments, highlighting, and other indicia consistent with the candid internal
6 review and development of agency policy and procedure. DEF-00005151 to DEF-00005211;
7 DEF-00009955t to DEF-00010016; DEF-00010017 to DEF-00010076; DEF-00010077 to DEF-
8 00010136; DEF-00010137 to DEF-00010194; DEF-00005093 to DEF-00005150; DEF-
9 00005212 to DEF-00005274; DEF-00005275 to DEF-00005327; DEF-00005328 to DEF-
10 00005381; DEF-00005382 to DEF-00005439; DEF-00010758

11 74. This is an email forwarding a predecisional draft version of procedural guidance
12 regarding the handling of national security information. It contains internal direction and
13 guidance consistent with the candid internal review and development of agency policy and
14 procedure. DEF-00010758 (also marked DEF-00016571)

15 75. The following predecisional draft documents reflect development of agency
16 guidance prepared to provide further clarification and direction regarding matters pertaining to
17 the vetting of cases involving national security concerns. The various drafts here reflect edits,
18 comments, questions and other indicia of the necessary predecisional review and development of
19 internal agency guidance documents. DEF-00011074; DEF-00011075; DEF-00011076; DEF-
20 00011077; DEF-00011078; DEF-00011079; DEF-00005539 to DEF-00005568; DEF-00010778
21 to DEF-00010820; DEF-00009765 to DEF-00009799; DEF-00008691 to DEF-00008722; DEF-
22 00005026 to DEF-00005057; DEF-00008723 to DEF-00008763; DEF-00005649 to DEF-
23 00005691; DEF-00004120 to DEF-00004364; DEF-00004365 to DEF-00004400; DEF-
24 00009255 to DEF-00009256; DEF-00010913 to DEF-00010942

25 76. These predecisional draft documents reflect the development of a working aid and
26 training intended to provide USCIS personnel with guidance regarding how to determine
27 whether an articulable link exists between an individual and a national security concern and how
28 to properly record and report information. DEF-00011273; DEF-00011275; DEF-00011543;

1 DEF-00016573 to DEF-00016577; DEF-00017051 to DEF-00017054; DEF-00004477 to DEF-
2 0004480; DEF-00004403 to DEF-00004404; DEF-00005509 [also DEF-00016588]; DEF-
3 00016589; DEF-00011281; DEF-00016591 to DEF-00016593; DEF-00016595 to DEF-
4 00016598; DEF-00016600 to DEF-00016604; DEF-00016949; DEF-00011276 to DEF-
5 00011277

6 77. These predecisional draft documents reflect the development of a statistical report
7 on workload and production numbers related to the FDNS mission, including work on national
8 security related cases. DEF-00004963 to DEF-00004965; DEF-00004966 to DEF-00004968;
9 DEF-00004969 to DEF-00004970

10 78. This document is an internal e-mail reflecting candid discussion regarding the
11 possibility of generating statistical information that could be released to the public, and
12 requesting comment. It is predecisional and deliberative. DEF-00005485

13 79. These are draft power point trainings regarding interview techniques. DEF-
14 00012277; DEF-00012361

15
16 80. This document is an internal e-mail discussing questions relating to a future
17 internal audit of use and recording of time in processing national security cases. DEF-00005583
18 to DEF-00005584

19 81. This document contains meeting minutes from an FDNS field manager's seminar,
20 and reflects internal discussion and information exchange on FDNS issues reflecting review,
21 comment, or further proposed policy or procedural development. DEF-00010336 to DEF-
22 00010360

23 82. This predecisional draft document reflects the development of training for
24 CARRP, including issues in current training and possible goals for new training. DEF-00010488
25 to DEF-00010505; DEF-00010864

26 83. This predecisional draft e-mail and report reflects internal discussions about
27 launching a new caseload management process. DEF-00010735 to DEF-00010738
28

1 84. This document is an internal discussion memo regarding takeaways from a
2 scheduling pilot project that at USCIS Application Support Centers (ASCs). It part of the candid
3 process of review and comment that is necessary to review a test or pilot program, and that may
4 inform whether the pilot can or should be adopted or by the agency. It is predecisional and
5 deliberative. DEF-00011650

6 85. These are predecisional internal draft documents and notes relating to developing
7 vetting processes for applicant information. DEF-00011765; DEF-00011766 to DEF-00011767;
8 DEF-00011775 to DEF-00011789; DEF-00011815 to DEF-00011826; DEF-00011790 to DEF-
9 00011793

10 86. These draft documents reflect internal discussion and input regarding how to
11 improve training presentations relating to the conduct of interviews, including comments,
12 proposed edits, questions, and suggestions about how to improve the presentation. They are
13 predecisional and deliberative. DEF-00011887 to DEF-00011890; DEF-00011891 to DEF-
14 00011904; DEF-00012099 to 00012102; DEF-00012103 to DEF-00012116

15 87. This document is a draft version of a memorandum intended to provide guidance
16 regarding the CARRP handling of DACA cases with NS concerns. It is predecisional and is part
17 of the internal deliberative process of drafting, editing, commenting, and revising policy and
18 procedure in advance of implementation. DEF-00001233 to DEF-00001234

19 88. These are predecisional draft documents regarding how USCIS personnel should
20 resolve potential national security cases that involve information from the Treasury Financial
21 Crimes Enforcement Network, including policy and procedure under consideration. DEF-
22 00001269 to DEF-00001271; DEF-00003042 to DEF-00003044

23 89. This document is draft FDNS-DS User Guide training which reflects the editing
24 and development of USCIS training regarding cases that may raise national security concerns
25 and use of USCIS' FDNS-DS system. It is predecisional and deliberative. DEF-00016572

26 90. This is an email forwarding a draft of USCIS Operational Guidance for the
27 Audiovisual Recording of Immigration Interviews, providing comments and discussion, and
28

1 requesting further comment. It is predecisional and deliberative. DEF-00016525; DEF-
2 00016526.

3 91. These documents reflect deliberative, predecisional discussions between agency
4 officials regarding whether the agency should contract for interview training, the selection of a
5 vendor for interview techniques training, and exchanging an existing interview training project
6 plan. DEF-00014818 to DEF-00014819; DEF-00014844; DEF-00014859 to DEF-00014861;
7 DEF-00014862 to DEF-00014863; DEF-00014864

8 92. This document reflects deliberative, pre-decisional notes on the implementation of
9 EB Form I-485 interview and adjudication process. DEF-00015176

10 93. The matters contained in this declaration are based upon my review of documents
11 which have been withheld in the case of *Wagafe, et al., v. Trump, et al.*, Case No. 2:17-cv-00094
12 in the United States District Court for the Western District of Washington, my personal
13 knowledge, my knowledge of the documents kept by USCIS in the course of ordinary business,
14 and on information provided to me by other USCIS employees in the course of my official duties
15 as Associate Director of FDNS.

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

17 Executed this 30th day of April, 2018 at Washington, D.C.

18
19 

20 Matthew D. Emrich

21 Associate Director, FDNS

22 U.S. Citizenship and Immigration Services

23 Washington, D.C.
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