

The Honorable Richard A. Jones

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IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf of  
*himself and other similarly situated,*

Plaintiffs,

v.

JOSPEH R. BIDEN, President of the United  
States, *et al.*,

Defendants.

CASE NO. 2:17-cv-00094-RAJ

**DECLARATION OF LEON B.  
TARANTO IN SUPPORT OF  
DEFENDANTS' OPPOSITION TO  
PLAINTIFFS' MOTION TO  
EXCLUDE OPINIONS OF DR.  
BERNARD SISKIN**

I, Leon B. Taranto, do declare and say:

1. I am a duly appointed Trial Attorney for the U.S. Department of Justice, Civil Division, Torts Branch in Washington, D.C., and I am one of the attorneys assigned to represent Defendants in this action.

2. Marked as "Exhibit 1" and filed separately under seal is a true and correct copy of excerpts from the transcript of the January 10, 2020 Deposition of Mr. Daniel Renaud;

3. Attached hereto and marked as "Exhibit 2" is a true and correct copy of excerpts from the transcript of the January 8, 2020 Deposition of Mr. Matthew Emrich;

DECLARATION OF LEON B. TARANTO IN SUPPORT OF  
DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION TO  
EXCLUDE OPINIONS OF DR. BERNARD SISKIN - 1

(Case No. 2:17-cv-00094-RAJ)

UNITED STATES DEPARTMENT OF JUSTICE  
CIVIL DIVISION, OFFICE OF IMMIGRATION LITIGATION  
Ben Franklin Station, P.O. Box 878  
Washington, D.C. 20044  
(202) 616-4900

1 4. Attached hereto and marked as “Exhibit 3” is a true and correct copy of excerpts from the  
2 transcript of the September 3, 2020 Deposition of Mr. Kevin Quinn, appearing pursuant to  
3 F.R.Civ.P. 30(b)(6). A true and correct copy of the unredacted excerpts is marked as “Exhibit 3 –  
4 Filed Under Seal” and filed separately under seal;

5 5. Marked as “Exhibit 4” and filed separately under seal is a true and correct copy of  
6 excerpts from the January 31, 2020 Deposition of Mr. Kevin Quinn.

7  
8 I declare under penalty of perjury that the foregoing is true and correct.

9 Executed on this 5th day of April 2021, at Washington, D.C.

10  
11 /s/ Leon B. Taranto  
12 LEON B. TARANTO

EXHIBIT 1  
– FILED UNDER SEAL –

# EXHIBIT 2

ATTORNEYS' EYES ONLY

Emrich, Matthew

January 8, 2020

1

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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ABDIQAFAR WAGAFE, et al., on :  
 behalf of themselves and others : Case No. :  
 Similarly situated, : 17-CV-00094 RAJ  
 Plaintiffs, :  
 VS. :  
 DONALD TRUMP, President of the : ATTORNEYS' EYES ONLY  
 United States, et al., :  
 Defendants. :

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Washington, DC  
Wednesday, January 8, 2020

Videotaped Deposition of MATTHEW EMRICH  
held at U.S. Department of Justice, 450 5th Street,  
NW, Washington, DC 20530, commencing at 9:37 a.m.,  
before Sherry L. Brooks, Certified LiveNote Reporter  
and Notary Public, in and for the District of  
Columbia.

ATTORNEYS' EYES ONLY

Emrich, Matthew

January 8, 2020

44

1 Q. Okay. And when did that stop?

2 A. I don't recall exactly.

3 Q. Was it in the last year?

4 A. That -- to the best of my recollection,  
5 that stopped in late 2011 or early 2012, but, again,  
6 that's to the best of my recollection right now.

7 Q. Okay. Thank you. Was there a division or  
8 a unit referred to as the CPIA?

9 A. There was. I don't recall which division  
10 that unit was in.

11 Q. Was that the unit that did the  
12 prioritization?

13 A. I don't recall exactly.

14 Q. Okay. Is CARRP an important policy for  
15 USCIS?

16 A. By important -- it is a policy -- if by  
17 important you mean it's a policy that provides  
18 benefits to the agency, I would say that it's an  
19 important policy.

20 Q. And why? Why is it important?

21 A. It provides the agency with a standard and  
22 -- a standardized way of identifying, recording, and

ATTORNEYS' EYES ONLY

Emrich, Matthew

January 8, 2020

45

1 adjudicating cases where national security indicators  
2 are present.

3 Q. Why is it important to have a standardized  
4 way to identify, record, and adjudicate cases where  
5 national security concerns are present?

6 A. In my experience, if there's not a  
7 standardized way of doing things, individuals will  
8 attempt to carry out their duties to the best of  
9 their ability. But because they're individuals, they  
10 will end up doing things in different ways.

11 Q. Do you think that CARRP plays an important  
12 role in protecting the national security of the  
13 United States?

14 A. I do.

15 Q. And why is that?

16 A. It -- the agency must not -- the agency  
17 cannot grant an immigration benefit without  
18 considering all available information that may impact  
19 the eligibility of the applicant or impact the  
20 eligibility of the person for that benefit.

21 Additionally, the agency must ensure that  
22 individuals are eligible for benefits. So the CARRP

ATTORNEYS' EYES ONLY

Emrich, Matthew

January 8, 2020

46

1 process provides a standard way that USCIS employees  
2 can identify national security concerns, can review  
3 those concerns to see if they -- to review those to  
4 identify national security indicators, to review  
5 those indicators to see if they constitute a national  
6 security concern, and work to obtain all of the  
7 information that the agency has -- obtain  
8 information, and ultimately the goal here is to  
9 adjudicate the case.

10 Q. So you said that one reason why CARRP is  
11 important to protecting national security is because  
12 you can't grant a benefit without considering a  
13 person's eligibility.

14 Did I get that right?

15 A. That's correct.

16 Q. And isn't that what the agency does in  
17 general in considering immigration benefit  
18 applications?

19 A. The agency has to consider all available  
20 evidence and matters that are reasonably available to  
21 it that may impact the person's eligibility for the  
22 benefit.



ATTORNEYS' EYES ONLY

Emrich, Matthew

January 8, 2020

47

1 Q. And what is -- what do immigration  
2 benefits have to do with national security?

3 A. If individuals obtain immigration benefits  
4 who may pose a risk to national security, they may --  
5 the immigration benefits may allow them to remain in  
6 the United States to obtain positions of public  
7 trust, to become U.S. government employees with  
8 security clearances.

9 Additionally, if individuals are involved  
10 in some type of terrorist activity, if they attain  
11 immigration benefits, then they may not be removable  
12 from the United States if they pose a threat to  
13 national security.

14 Q. I'm sorry. Say that again. They may not  
15 be removable --

16 A. If they pose -- individuals who pose a  
17 threat to national security may -- may -- the  
18 attainment of immigration benefits may mean that  
19 they're no longer removable under various removable  
20 grounds.

21 Q. You mean if they are made a citizen?

22 A. Correct.

ATTORNEYS' EYES ONLY

Emrich, Matthew

January 8, 2020

48

1 Q. And when you say positions of public  
2 trust, what are you referring to?

3 A. Many positions, both in local, state, and  
4 the Federal Government, are based on a person being a  
5 U.S. citizen. So that could be -- that could be law  
6 enforcement officers, people who work in sensitive  
7 government positions, people who hold sensitive  
8 positions with federal, state, and local government.

9 Q. And why is CARRP important for determining  
10 eligibility, if that's what your testimony -- did I  
11 get that right, that CARRP is important for  
12 determining whether a person is eligible for --

13 A. CARRP is important in providing the agency  
14 a standardized way to identify matters that may  
15 impact eligibility, specifically national security  
16 indicators.

17 It provides a standard way of reviewing  
18 those indicators to see if they constitute a national  
19 security concern and provides the agency procedures  
20 by which to consider, consider that national --  
21 consider the national security concerns if they do --  
22 if they are confirmed to be national security

ATTORNEYS' EYES ONLY

Emrich, Matthew

January 8, 2020

49

1 **concerns and ultimately adjudicate the case.**

2 Q. In what way did the national security  
3 indicators laid out in the CARRP policy relate to  
4 eligibility for immigration benefits?

5 A. It is not -- it is my understanding that  
6 there's no exhaustive list of national security  
7 indicators that are within CARRP policy.

8 Q. What do you mean by that?

9 A. There's no -- there is no defined list of  
10 potential national security indicators.

11 Q. So how would an officer know whether  
12 something is a national security indicator?

13 A. There are -- there are -- there are sample  
14 national security indicators, but that list does not  
15 purport to be exhaustive.

16 Q. So an officer adjudicating or reviewing an  
17 immigration benefit could conclude based on their own  
18 definition that someone is a national security  
19 concern?

20 A. The process by which an officer would come  
21 to the determination of a national security concern  
22 is the -- one or more national security indicators

ATTORNEYS' EYES ONLY

Emrich, Matthew

January 8, 2020

51

1           **A.**     So CARRP standardizes the procedures that  
2     are being followed by the officers. It standardizes  
3     recordkeeping. As far as the cases go, it  
4     establishes -- it reinforces the standard in the  
5     process by which indicators are reviewed.

6                     It provides for training and it outlines  
7     processes and procedures so that cases where national  
8     security concerns are identified can ultimately be  
9     adjudicated. That's the goal.

10           **Q.**     Okay. But ultimately the conclusion that  
11     a person is a national security concern is up to the  
12     individual officer that's reviewing that case?

13           **A.**     It is -- an officer reviews and an officer  
14     ultimately makes the decision whether or not the case  
15     is a national security concern, yes.

16           **Q.**     Okay. But there are some documents that  
17     do spell out what national security concerns -- what  
18     are indicators of national security concerns,  
19     correct?

20           **A.**     Correct.

21           **Q.**     And one of those documents is what's  
22     referred to as Attachment A; is that right?

ATTORNEYS' EYES ONLY

Emrich, Matthew

January 8, 2020

239

1 which relates to whether or not the person is on the  
2 terrorism watchlist and has been nominated to the  
3 terrorism watchlist and meets the interagency  
4 criteria for inclusion on the terrorism watchlist.

5 So non-KST is defined as it implies, a  
6 non-KST.

7 Q. Correct. But there are certain codes that  
8 are put into TECS that would indicate that someone is  
9 a non-KST, right?

10 A. It's my understanding that the information  
11 in TECS would be the basis of whether or not there  
12 was a national security indicator.

13 Q. Okay. You're not answering my question.  
14 We know that TECS would reveal that -- whether or not  
15 somebody is a KST. It's also the case that TECS --  
16 the codes in TECS could reveal that a person is a  
17 non-KST, correct?

18 A. By that -- so -- as I -- the -- TECS may  
19 include information that -- that is a national  
20 security indicator that would -- that may cause a  
21 person to become a national security concern if those  
22 -- if the indicators in the totality of circumstances

ATTORNEYS' EYES ONLY

Emrich, Matthew

January 8, 2020

245

1 question reveals any of that.

2 MR. TARANTO: The witness may answer to  
3 the extent it doesn't reveal details in law  
4 enforcement information concerning the TSDB.

5 **A. Could you repeat the question, please?**

6 BY MS. PASQUARELLA:

7 Q. The coding in TECS that indicates that  
8 someone is a TSDB comes from -- I'm sorry.

9 The coding in TECS that indicates that a  
10 person is a KST comes from the TSDB, correct?

11 **A. That is my understanding.**

12 Q. Okay. And sorry if I already asked this.  
13 You're not familiar with any coding that reflects  
14 that a person may be a non-KST, correct?

15 **A. The -- I am -- I am familiar with the fact  
16 that TECS includes information that may be a national  
17 security indicator.**

18 Q. Okay. And who inputs that information  
19 into TECS, what agency?

20 **A. That -- I'm not familiar with all of the  
21 agencies that can put information into TECS.**

22 Q. Does the FBI put information into TECS?

EXHIBIT 3  
– UNREDACTED  
VERSION FILED  
UNDER SEAL –

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Page 1

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



CONFIDENTIAL

Page 31

1 BY MS. PASQUARELLA:

2 Q So do you know why the agency decided  
3 that it was important to launch the CARRP policy?

4 A We wanted to ensure that we had a  
5 consistent approach for identifying potential  
6 national security concerns for reviewing those  
7 cases, for documenting and working those cases  
8 and for getting those cases to and through  
9 adjudication.

10 Q And was there something inconsistent  
11 about the way national security cases were  
12 handled prior to CARRP?

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

15 THE WITNESS: Prior to CARRP, those  
16 cases were, as I said, handled at headquarters,  
17 and part of CARRP was returning responsibility of  
18 those cases back to the field offices.

19 BY MS. PASQUARELLA:

20 Q And why did they want to do that?

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

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Page 32

1 THE WITNESS: Because the -- part of  
2 the reason was that the local offices would have  
3 greater familiarity with the A file, with the  
4 case, possibly with the case agents and cases of  
5 law enforcement activity, and that coordination  
6 of the cases and, again, ultimately working with  
7 adjudications would be facilitated by having the  
8 vetting of the cases done in the local office.

9 BY MS. PASQUARELLA:

10 Q Okay. And who was involved in the  
11 formulation of the CARRP policy?

12 A Within USCIS, it was led -- it was  
13 FDNS, Fraud Detection and National Security  
14 division, as part of our national security and  
15 recordation directorate at the time, as well as  
16 domestic operations, which oversaw the field  
17 offices and service centers, and the refugee  
18 asylum international operations directorate, as  
19 well as our Office of Chief Counsel.

20 Q Did anyone outside of USCIS  
21 participate in the formulation of CARRP?

22 A No.

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Page 35

1 question?

2 Q What information did the agency  
3 consider when it came up with its definition of  
4 national security concern that's contained in the  
5 2008 CARRP policy?

6 A We reviewed the Immigration and  
7 Nationality Act for the grounds of  
8 inadmissibility and removability to be included.  
9 The cases involving national security concerns  
10 were being worked at headquarters at the time.  
11 So the experience gained from working on those  
12 cases informed the development of CARRP policy.

13 Q Okay. So the INA and your own  
14 on-the-job experience. Was there anything else  
15 that was considered?

16 A No.

17 Q And in the CARRP -- the 2008 CARRP  
18 policy defines national security concerns to  
19 include known or suspected terrorists, correct?

20 A This is correct.

21 Q We'll refer to that as KST, a known or  
22 suspected terrorist.

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Page 36

1           Are you aware of any other information  
2   that the agency considered in deciding to treat  
3   KSTs as national security concerns?

4           A       Besides what we discussed?

5           Q       Correct.

6           A       No.

7           Q       Okay. And did USCIS consider  
8   information about the accuracy of the KST  
9   designation in deciding to include KSTs as  
10 national security concerns in the CARRP policy?

11          A       What do you mean by "the accuracy"?

12          Q       Any information about whether or not  
13 the KST designation is accurate.

14          A       Besides our experience working on  
15 cases involving such individuals, no.

16          Q       And when you say "experience", you  
17 mean your on-the-job experience, correct?

18          A       Yes.

19          Q       Did it consider at the time the  
20 evidentiary standard that's used by the  
21 intelligence community in making the  
22 determination that somebody is a KST?

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Page 60

1 and security checks.

2           Additionally, there is a small section  
3 in the NaBISCOP that describes at a high level  
4 some parts of the CARRP policy for those officers  
5 who are running background and security checks  
6 but may not be otherwise familiar with the CARRP  
7 policy.

8           Q       Who would those people be who are  
9 running the background checks that are not  
10 otherwise familiar with the CARRP policy?

11          A       It might be Immigration Services  
12 officers who are doing the upfront background and  
13 security checks or who are otherwise running  
14 background checks on cases prior to adjudication.

15          Q       Okay. And when an adjustment of  
16 status or a naturalization application is first  
17 filed, at what point are the background checks  
18 initially run?

19          A       A number of the background checks are  
20 initiated fairly early in the process. The TECS  
21 checks are typically done -- TECS is one of our  
22 background and security checks and is required in

CONFIDENTIAL

Page 61

1 all adjustment and naturalization cases. That

2

3 receipt of the application.

4 The FBI Name Checks are typically  
5 implemented sometime shortly after that. A FBI  
6 fingerprint check is typically also required for  
7 those applications, and that would be initiated  
8 sometime after we were able to capture the  
9 applicant's biometrics so those can be submitted.

10 Q So those are the background checks  
11 that are run very early on. Are there other  
12 background checks that are run at a later point?

13 A There are other systems that officers  
14 may review as part of their adjudication, but  
15 those are the mandatory background checks that  
16 are run on all cases.

17 Q I see. So the TECS FBI Name Check and  
18 FBI fingerprint are the mandatory background  
19 checks that are run in every case?

20 A Actually, I apologize. I will add  
21 that our officers also review, as part of the  
22 reviewing the information from the FBI

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Page 62

1 fingerprint check, information from the DHS  
2 database IDENT, which houses biometric typically  
3 entry information, as well as other biometric  
4 encounters. So that's part of the biometrics  
5 collection. But yes, TECS, FBI fingerprint, FBI  
6 Name Check, and IDENT.

7 Q And then other database systems or  
8 background check systems may be run depending on  
9 the circumstances in a given case; is that right?

10 A That is correct.

11 Q But there are no other mandatory  
12 checks that are required. Am I getting that  
13 right?

14 A That is correct.

15 Q Okay. While we're on the subject of  
16 IDENT, IDENT is the DHS biometric database,  
17 correct?

18 A That is correct.

19 Q And what is USCIS's IDENT for?

20 A For biometrically comparing the  
21 applicant information that we receive to other  
22 individuals in the system, to identify potential

CONFIDENTIAL

Page 63

1 fraud, as well as to identify other prior  
2 collections, encounters with the applicant.

3 Q When you say "encounters", do you  
4 mean -- what do you mean by that?

5 A Typically, I mean other biometric  
6 collections by -- typically by DHS.

7 Q Okay.

8 A So their entry at the border, for  
9 example, or at a port of entry.

10 Q And are you familiar with the database  
11 ADIS, A-D-I-S?

12 MR. KIPNIS: Objection; scope. You  
13 can answer in your personal capacity.

14 THE WITNESS: I am familiar with ADIS.

15 BY MS. PASQUARELLA:

16 Q Is that -- is that database reviewed  
17 through TECS?

18 MR. KIPNIS: Objection; scope.

19 THE WITNESS: No, I don't believe so.

20 Sorry.

21 BY MS. PASQUARELLA:

22 Q Okay. And what is -- what's the



CONFIDENTIAL

Page 64

1 information that USCIS is looking -- is accessing  
2 when it -- when it accesses TECS?

3 A Information in TECS would typically  
4 include prior encounters with law enforcement  
5 agencies. So it may include other encounters  
6 with Customs & Border Protection. It might  
7 include information about other law enforcement  
8 investigations for which the applicant is the  
9 subject, and it may also include information on  
10 whether or not the individual is listed as a  
11 known or suspected terrorist.

12 Q Okay. Anything else?

13 A It is a general law enforcement  
14 lookout communication system. So it may have  
15 other types of law enforcement lookouts and  
16 encounter information. But lookouts and  
17 encounters is broadly how I would categorize the  
18 rest of the information.

19 Q Okay. And what information is USCIS  
20 accessing when it -- when it accesses the FBI  
21 fingerprint system?

22 A The FBI's fingerprint system includes

CONFIDENTIAL

Page 65

1 information from the FBI on arrests, as well as  
2 state-level information shared by those states  
3 with the CJIS, Criminal Justice Information  
4 System.

5 Q Would that be criminal history  
6 information?

7 A Yes.

8 Q And the mandatory checks that we  
9 talked about, IDENT checks, FBI Name Check, FBI  
10 fingerprint, are those run at the National  
11 Benefits Center?

12 MR. KIPNIS: Objection; scope.

13 THE WITNESS: They are -- yes. The  
14 National Benefits Center runs -- initiates  
15 those -- well, no. I apologize.

16 So they do the upfront TECS checks,  
17 and they will submit the FBI Name Checks. The  
18 FBI fingerprint checks are initiated when an  
19 individual is -- submits their biometric  
20 information at one of our applications support  
21 centers, though the NBC may review the results of  
22 those background checks also.

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Page 66

1 BY MS. PASQUARELLA:

2 Q But the initial checks that we talked  
3 about that are run [REDACTED] like, for  
4 example, TECS, is that typically run by -- is  
5 that the National Benefits Center that's running  
6 them or who's running them?

7 A Yes. The National Benefits Center  
8 runs those.

9 Q Okay. And when those initial checks  
10 flag something that should be investigated, as a  
11 potential indicator of a national security  
12 concern, who -- who then investigates those  
13 flags?

14 [REDACTED]

15 [REDACTED]

16 MR. KIPNIS: I'm going to object -- go  
17 ahead and answer. I'm sorry. Objection to  
18 scope. You can answer.

19 THE WITNESS: I apologize.

20 MR. KIPNIS: No, it's my fault.

21 [REDACTED]

[REDACTED]

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Page 148

1 BY MS. PASQUARELLA:

2 Q Okay. I want to talk now about KSTs.  
3 What's USCIS's understanding of what it means to  
4 be a KST?

5 A A KST, a known or suspected terrorist,  
6 is an individual who is known or is reasonably  
7 suspected of being engaged in terrorist activity,  
8 of being a member of a terrorist organization or  
9 planning terrorist activity.

10 Q And who makes the determination about  
11 who is a KST?

12 MR. KIPNIS: Based on USCIS's  
13 knowledge?

14 MS. PASQUARELLA: Yes.

15 THE WITNESS: Law enforcement and  
16 intelligence agencies nominate individuals for  
17 placement on the watchlist as a known or  
18 suspected terrorist.

19 BY MS. PASQUARELLA:

20 Q And then who decides who actually  
21 places them? Who gets to be placed on that  
22 watchlist?



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Page 150

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Page 151

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 BY MS. PASQUARELLA:

9 Q Does USCIS know what the evidentiary  
10 standard is to nominate someone to the TSDB?

11 A U.S. -- sorry.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CONFIDENTIAL

Page 152

1 activity.

2 BY MS. PASQUARELLA:

3 Q And what is the definition that's used  
4 of terrorist activity in finding that's there's  
5 reasonable suspicion to place someone on the  
6 watchlist?

7 MR. KIPNIS: Objection; scope.

8 THE WITNESS: I'm not sure --

9 COURT REPORTER: What was that?

10 MR. KIPNIS: I objected based on the  
11 lack of foundation also.

12 THE WITNESS: And I said I'm not sure  
13 what that is.

14 BY MS. PASQUARELLA:

15 Q Okay. Does being a KST satisfy  
16 CARRP's articulable link standard?

17 COURT REPORTER: I'm sorry. Can you  
18 repeat the question?

19 BY MS. PASQUARELLA:

20 Q Does being a KST satisfy CARRP's  
21 articulable link standard?

22 A Yes. We consider an individual who is



CONFIDENTIAL

Page 153

1 listed as a K -- is a confirmed KST to have an  
2 articulable link to national security across  
3 USCIS.

4 Q Why does USCIS think that being an KST  
5 satisfies the articulable link standard?

6 A Because of the -- the -- a person is  
7 nominated as a KST if there is a reasonable  
8 suspicion, the person has been involved in  
9 terrorist activities. Because of that and  
10 because terrorist activities are included in INA  
11 212, we consider that to be similar to our own  
12 articulation of a national security concern for  
13 non-KST security concerns.

14 Q But, again, USCIS doesn't know what  
15 definition is applied to terrorist activity when  
16 an agency nominates someone to the watchlist?

17 MR. KIPNIS: Objection; scope.

18 THE WITNESS: I'm sorry. I forget  
19 exactly what the definition of terrorism is that  
20 they use in the watchlist.

21 BY MS. PASQUARELLA:

22 Q So you don't know whether that

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

CONFIDENTIAL

Page 161

- █ [REDACTED]
- █ [REDACTED]
- █ [REDACTED]
- █ [REDACTED]
- █     █ [REDACTED]
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- █ [REDACTED] [REDACTED]
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EXHIBIT 4  
– FILED UNDER SEAL –