

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>ANGE SAMMA, et al.,</b>	)	
<b>Plaintiffs,</b>	)	<b>Civil Action No.</b>
	)	
<b>v.</b>	)	<b>20-cv-01104-PLF</b>
	)	
<b>U.S. DEPARTMENT OF DEFENSE, et al.,</b>	)	
<b>Defendants.</b>	)	
	)	

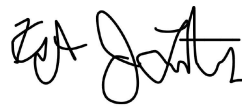
**DECLARATION OF KATHERINE J. LOTSPEICH**

I, Katherine J. Lotspeich, do hereby state and declare as follows, pursuant to Section 1746 of Title 28 of the United States Code.

1. I am employed by the United States Department of Homeland Security (“DHS”), United States Citizenship and Immigration Services (“USCIS”), as Chief of the Office of Performance and Quality (“OPQ”).
2. As Chief of OPQ, I am responsible for oversight and management in producing data and operational analyses to senior USCIS decision-makers to promote effective and efficient decision-making, and for responding to immigration data requests from key stakeholders including Congress, DHS, other government agencies, researchers, and the general public.
3. I make this declaration based on my personal knowledge, and review of official documents and records maintained by USCIS, as well as on information available to me in the course of my official duties.
4. I have reviewed the document attached as **Exhibit 1**, entitled “N-400, Application for Naturalization By Active Military, Receipt, Approval, and Denial.” This document was prepared by OPQ on October 14, 2021. It presents information about applications for military naturalization filed by individuals who are identified in USCIS records as current members of the U.S. armed forces.

5. The data was compiled from two USCIS systems of records used for maintaining data on naturalization applications, specifically the Computer Linked Application Information Management Systems (“CLAIMS 4” or “C4”) and the USCIS Electronic Immigration System (“ELIS”).
6. C4 generally contains information about military naturalization applications filed before approximately October 2019 and adjudicated before approximately October 2020.
7. ELIS contains information about military naturalization applications filed or adjudicated after those dates. Current members of the U.S. armed forces were identified in ELIS records by determining whether the applicant responded “yes” to the following question on Form N-400: “Are you currently a member of the U.S. armed forces?”
8. Current members of the U.S. armed forces were identified in C4 records using other system flags that would denote a current military member, but because the information in C4 is not as exact, it is an estimate.
9. I certify that the data in the document attached as Exhibit 1 are true and correct to the best of USCIS’s knowledge and ability based on USCIS systems of records.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 15<sup>th</sup> day of October, 2021, at Washington, D.C.



Digitally signed by  
KATHERINE J LOTSPEICH  
Date: 2021.10.15 13:41:28  
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Katherine J. Lotspeich  
Chief  
Office of Performance and Quality  
U.S. Citizenship and Immigration Services  
U.S. Department of Homeland Security