

Exhibit I

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.

DONALD TRUMP, et al.,

Defendants.

No. 2:17-cv-00094-RAJ

DECLARATION OF JULIE E.
FARNAM IN SUPPORT OF
DEFENDANTS' RESPONSE TO
PLAINTIFFS' MOTION TO COMPEL

I, Julie E. Farnam, do hereby declare and say:

1. I am a Senior Advisor for Field Operations Directorate (FOD), United States Citizenship and Immigration Services ("USCIS"), Department of Homeland Security ("DHS"). From January 30, 2017 to August 7, 2017, I was detailed to the Acting Director's Office of USCIS as a Senior Advisor.

2. During my detail to the Acting Director's Office, I was tasked with leading implementation efforts for USCIS for Executive Order 13769, "Protecting the Nation from Foreign Terrorist Entry into the United States," 82 Fed. Reg. 8977 (Feb. 1, 2017), and Executive Order 13780, "Protecting the Nation from Foreign Terrorist Entry into the United States," 82 Fed. Reg. 13209 (Mar. 9, 2017) (hereinafter "Executive Orders" or "First EO and "Second EO" respectively). This assignment involved leading agency

1 efforts related to all applicable deliverables required in the Executive Orders, meeting
2 regularly with DHS headquarters officials, serving as USCIS's representative on the DHS
3 Executive Order Task Force and coordinating with other agencies and departments as
4 necessary.

5 3. The matters contained in this declaration are based on my review of the
6 Plaintiffs' First Requests for Production in *Wagafe, et al., v. Trump, et al.*, Case No. 2:17-
7 cv-00094, now pending in the United States District Court for the Western District of
8 Washington, and information available to me from leading implementation efforts of the
9 Executive Orders from January 30, 2017 to August 7, 2017.

10 4. I am aware of the class action litigation involving Plaintiffs that has been filed
11 in the United States District Court for the Western District of Washington, and that in this
12 class action Plaintiffs challenge the Controlled Application Review and Resolution
13 Program ("CARRP").

14 5. I am familiar with the USCIS Memorandum entitled "Policy for Vetting and
15 Adjudicating Cases with National Security Concerns," dated April 11, 2008 (hereinafter
16 "CARRP Memorandum"), which established CARRP.

17 6. I am aware of current CARRP policies and guidance.

18 7. I am familiar with the Executive Order 13769, "Protecting the Nation from
19 Foreign Terrorist Entry into the United States," 82 Fed. Reg. 8977 (Feb. 1, 2017), and
20 Executive Order 13780, "Protecting the Nation from Foreign Terrorist Entry into the
21 United States," 82 Fed. Reg. 13209 (Mar. 9, 2017). Based on my duties while detailed to
22 the Acting Director's Office, I reviewed all agency efforts to implement the Executive
23 Orders and participated in discussions regarding the actions that USCIS should take to
24 implement the EOs. I am aware of actions that USCIS took to implement the Executive
25 Orders.

26 8. To the best of my knowledge, information, and belief, neither the First nor
27 Second EO has impacted the development, adoption, review, or revision of CARRP.
28

1 9. To the best of my knowledge, information, and belief, efforts to implement the
2 Executive Orders have not involved changing, modifying, or updating CARRP policy.

3 10. To the best of my knowledge, information, and belief, CARRP and any policy,
4 program, or effort that supports implementation of the Executive Orders are unrelated
5 and distinct from one another.

6 11. If directed to search for information relating to CARRP and the relationship
7 between its development, adoption, review, or revision and the First and Second EOs, to
8 the best of my knowledge, information, and belief, such information does not exist at
9 USCIS.

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

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Executed this 6th day of October, 2017 at Washington, D.C.

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Julie E. Farnam
Senior Advisor
U.S. Citizenship and Immigration Services
Washington, D.C.

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