

EXHIBIT C

~~FILED UNDER SEAL~~

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1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF WASHINGTON
3 AT SEATTLE

4 ABDIQAFAR WAGAFE, *et al.*, on behalf
of themselves and others similarly situated,

No. 2:17-cv-00094-RAJ

5 Plaintiffs,

6 v.

7 DONALD TRUMP, President of the
United States, *et al.*,

8 Defendants.
9

10 **SECOND SUPPLEMENTAL EXPERT REPORT OF SEAN M. KRUSKOL**

11 I, Sean M. Kruskol, hereby declare:

12 I make this declaration based on my own personal knowledge, and if called to testify, I could and
13 would do so competently as follows:

14 **I. Introduction**

15 **A. My Assignment**

16 1. I was engaged by counsel for the Plaintiffs to: 1) review, analyze, and compile
17 summary statistics related to Application to Register Permanent Residence or Adjust Status
18 (“Form I-485”) and Application for Naturalization (“Form N-400”) data provided by U.S.
19 Citizenship and Immigration Services (“USCIS”); and 2) review, merge, and analyze various
20 lists of individuals subject to a current USCIS program called the Controlled Application Review
21 and Resolution Program (“CARRP”).¹ I issued an Expert Report in this matter dated February
22 28, 2020 (“February Report”). My February Report contained certain opinions pertaining to
23 Forms I-485 and N-400 applications using summary data provided by USCIS (“Original USCIS
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26 ¹ For a more detailed discussion of background information relevant to this Supplemental Report, see my February Report, ¶¶ 11–20.

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1 Data”).² Since I issued my February Report, data and information used to form my opinions in
2 my February Report were updated by USCIS. As a result, I issued a Supplemental Expert Report
3 dated July 17, 2020 (“Supplemental Report”). My Supplemental Report contained certain
4 opinions pertaining to Forms I-485 and N-400 applications using updated summary data
5 provided by USCIS and the underlying application data used to create the updated summary data
6 (“Updated USCIS Detailed Data”). Since I issued my Supplemental Report, new information
7 used to form my opinions in my February Report and Supplemental Report became available
8 through a Federal Rule of Civil Procedure 30(b)(6) (“30(b)(6)”) deposition regarding the
9 Updated USCIS Detailed Data, including information regarding a purported data error that was
10 discovered by USCIS and that led to the creation of the Updated USCIS Detailed Data. As a
11 result, I have been asked by Plaintiffs to review and analyze this additional information.

12 **B. Purpose of this Second Supplemental Report**

13 2. On August 31, 2020, subsequent to the issuance of my February Report and
14 Supplemental Report, Plaintiffs deposed an individual from USCIS regarding topics including:
15 1) how USCIS identified a purported error in the data I relied upon for my February Report; 2)
16 the process by which USCIS queried its databases to correct the purported error it identified; 3)
17 the data definitions for fields contained within underlying data USCIS produced subsequent to
18 my February Report; and 4) validation procedures, if any, performed by USCIS to ensure the
19 updated data it produced is complete and accurate.

20 3. My findings and opinions are based on my education, training, professional
21 experience, and the list of documents/information considered and included in Exhibit BG. The
22 documents I have considered include items such as pleadings, class lists, data from USCIS, two
23 depositions and related exhibits, and publicly available data and information. I was supported by
24 a team of professionals at Cornerstone Research working under my direction and supervision.
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² For a detailed description of the Original USCIS Data, see my February Report, ¶¶ 22–25.

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1 4. The opinions and analyses presented in this Second Supplemental Report are
2 based on currently available information. If new information relating to my analyses or opinions
3 becomes available, I may need to modify this Second Supplemental Report.³

4 5. I have not testified as an expert at trial or by deposition in any case within the past
5 four years. My current CV, including publications I authored within the past 10 years, is
6 included as Exhibit BF.

7 **II. Summary of Opinions**

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9 6. Based on my review and analyses of data and information produced to date, the
10 Updated USCIS Detailed Data appears to overstate the number of applications subject to
11 CARRP. If I was provided data containing more granular fields regarding the processing of
12 CARRP processed applications, I would be able to quantify this potential overstatement and the
13 effect it may have on the processing times and approval and denial rates of CARRP processed
14 applications.

15 7. Based on my review and analyses of data and information produced to date, I
16 identified additional potential data anomalies such as: 1) duplicate records; and 2) application
17 processing times that are inconsistent with my understanding of the duration of USCIS's
18 adjudication process.

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23 ³ On 9/14/20, I received a dataset containing 10,621,174 records that purports to be the underlying data for the
24 Original USCIS Data. I have performed certain preliminary validation, review, and analysis procedures over this data.
25 Based on my preliminary review and analysis, in the Updated USCIS Detailed Data, I identified approximately 200
26 CARRP processed applications with a CME Completed *after* June 21, 2017 that did not have a CME Created Date or
CME Completed Date in the underlying data for the Original USCIS Data. See for example, "newid 04VHR5KR01."
In USCIS's 30(b)(6) deposition, USCIS indicated that it corrected a purported data error that was the result of a date
parameter that excluded NS Concern CMEs for applications where the NS Concern CME was completed *before* June
21, 2017. It is unclear why underlying detailed data, such as CME Created Dates or CME Complete Dates, for
records with CME Completed Dates *after* June 21, 2017 would be different between the two datasets. If permitted to
submit an additional report, I may present additional analysis related to this data.

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III. Basis for Opinions

A. USCIS's Definition of CARRP Processed Applications in this Litigation

8. In my Supplemental Report, I analyzed USCIS's definition of CARRP processed applications.⁴ My analysis was performed by using the Updated USCIS Detailed Data and comparing, for a given anonymized application: 1) the date a National Security Concern ("NS Concern") case was purportedly opened and potentially completed per Case Management Entity ("CME") dates contained within the Updated USCIS Detailed Data; 2) the date an application was received per the Updated USCIS Detailed Data ("Receipt Date"); and 3) the most recent status date of an application per the Updated USCIS Detailed Data ("Last Application Status Date"). Essentially, I identified CARRP processed applications by comparing one data source to another data source.⁵ I was unable to review any underlying applications.

9. Based on my analysis, I concluded that it is unclear how an NS Concern designation for an application relates to the designation of CARRP vs. Not-CARRP. For example, it was unclear to me why an application was identified as CARRP if the application is associated with: 1) an NS Concern case that was opened, but the NS Concern case was not completed; or 2) an NS Concern case was opened, but the NS Concern case was not completed until *after* the adjudication date. See my Supplemental Report, Exhibit AA.

10. The method of replicating USCIS's identification of CARRP processed applications, as described in my Supplemental Report, appears to be consistent with the testimony of Kevin M. Shinaberry, USCIS's 30(b)(6) witness regarding the Updated USCIS Detailed Data. USCIS testified that it does not maintain a contemporaneous field in its databases

⁴ ¶¶ 18–20.

⁵ From the USCIS 30(b)(6) deposition and Defendants' Objections and Responses to Plaintiffs' Fifth Request for Production of Documents and Third Interrogatory, I understand that CME dates contained within the Updated USCIS Detailed Data were sourced from the Fraud Detection and National Security Data System ("FDNS-DS"), while Receipt Date and Last Application Status Date were sourced from CLAIMS 3, CLAIMS 4, and Electronic Immigration System ("ELIS"). See 30(b)(6) Deposition of USCIS's Witness Kevin M. Shinaberry, 30(b)(6) deposition regarding the Updated USCIS Detailed Data, 8/31/20 ("USCIS 30(b)(6) Deposition"), p. 110. See also, Defendants' Objections and Responses to Plaintiffs' Fifth Request for Production of Documents and Third Interrogatory, 10/16/18, p. 22. For more detailed description on the various USCIS sources used to prepare the Updated USCIS Detailed Data, see Section III.B.1 below.

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1 that identifies applications as subject to CARRP or not.⁶ In addition, USCIS confirmed that it
2 did not review underlying applications to validate its results as to whether any applications were
3 subject to CARRP or not.⁷ Instead, USCIS relied on an algorithm to identify CARRP processed
4 applications in the Updated USCIS Detailed Data.⁸ This algorithm was created for the purposes
5 of this litigation.⁹ According to this algorithm, if a CME was open at any time between the
6 application Receipt Date and Last Application Status Date, that application would be identified
7 as CARRP.¹⁰

8 11. USCIS’s use of this algorithm to identify CARRP processed applications appears
9 to overstate the number of applications subject to CARRP in the Updated USCIS Detailed Data
10 and related Updated USCIS Summary Data. This apparent overstatement is a result of USCIS’s
11 algorithm using the earliest date a CME was opened as its indicator of a CARRP processed
12 application.

13 12. According to the FDNS-DS User Guide Release 16.2 (“FDNS-DS User Guide”),
14 an NS Concern CME “is created when an application or petition is associated with information
15 that *could* fall under current Controlled Application Review and Resolution Program (CARRP)
16 guidance.”¹¹ In the 30(b)(6) deposition, USCIS acknowledged that based on the FDNS-DS User
17 Guide, one could “infer” that “an NS concern CME could be created even when the application
18 does not definitely fall under CARRP.”¹²

21 ⁶ USCIS 30(b)(6) Deposition, pp. 101–102, 108.

22 ⁷ USCIS 30(b)(6) Deposition, pp. 52–55.

23 ⁸ USCIS 30(b)(6) Deposition, pp. 98–100 (“[T]here’s an algorithm that’s run that does a date comparison on CME
24 creation and completion dates against the receipt and status date of the application... If they have a CME creation
25 date prior to the status date of their application that’s less than or equal to and they have the completion date -- CME
26 completion date is either null or is greater than or equal to the receipt of the application... So, for example, if the -- the
CME created date 1 and completion date 1 -- if those -- if those dates, compared to their receipt and current status
date of an application, indicated that the case was CARRP processed, then the CME CARRP indicator []would be a
yes.”)

⁹ USCIS 30(b)(6) Deposition, p. 101.

¹⁰ USCIS 30(b)(6) Deposition, p. 103 (“Q. But if the CME was open at any time between the receipt and the current
status date, then it would be considered a CARRP case; is that correct? A. Correct.”)

¹¹ USCIS Fraud Detection and National Security-Data System User Guide, Release 16.2, 1/31/20 (DEF-00428622)
 (“FDNS-DS User Guide”), p. 85 (emphasis added).

¹² USCIS 30(b)(6) Deposition, p. 126.

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1 13. The FDNS-DS User Guide also states that an NS Concern CME can be created
2 for an applicant even when the applicant “has not been confirmed as an NS Concern.”¹³ In the
3 30(b)(6) deposition, USCIS confirmed that “the CME could be created prior to confirmation” of
4 an NS Concern.¹⁴

5 14. The FDNS-DS User Guide indicates that the FDNS-DS database contains “four
6 sub-statuses depending on the individual facts of the [NS Concern] investigation.”¹⁵ These sub-
7 statuses are “NS Not Confirmed,” “NS Confirmed,” “NS Concern Resolved,” and “NS Concern
8 Unresolved” (collectively “Sub-statuses”).¹⁶ In the 30(b)(6) deposition, USCIS confirmed that,
9 according to its algorithm, “an individual’s application could be labeled a CARRP case even if
10 the applicant had a sub[-]status of NS [N]ot [C]onfirmed.”¹⁷ USCIS also confirmed that,
11 according to its algorithm, “an individual’s application could be labeled a CARRP case even if
12 the applicant had a sub[-]status of NS [C]oncern [R]esolved.”¹⁸ This means USCIS’s algorithm
13 identified an application as being subject to CARRP even when “[n]o nexus to national security
14 existed at the date of completion.”¹⁹

15 15. The FDNS-DS User Guide also indicates that FDNS’s database contains three
16 concern types: “KST,” “Non-KST,” and “Non-NS” (collectively “Concern Types”).²⁰ An
17 applicant is first classified as KST or Non-KST. An applicant cannot start out as a “Non-NS”
18 Concern Type.²¹ An applicant is identified as “Non-NS” when the applicant “is no longer a
19 national security concern or it has been determined that the information does not relate to the
20 [applicant].”²² In the 30(b)(6) deposition, USCIS confirmed that, according to its algorithm, “an
21 individual’s application would be labeled a CARRP case even if the applicant eventually had a
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23 ¹³ FDNS-DS User Guide, p. 450.

24 ¹⁴ USCIS 30(b)(6) Deposition, p. 129.

25 ¹⁵ FDNS-DS User Guide, p. 453.

26 ¹⁶ FDNS-DS User Guide, p. 454.

¹⁷ USCIS 30(b)(6) Deposition, p. 150.

¹⁸ USCIS 30(b)(6) Deposition, pp. 150–151.

¹⁹ FDNS-DS User Guide, p. 454.

²⁰ FDNS-DS User Guide, p. 454.

²¹ FDNS-DS User Guide, p. 454.

²² FDNS-DS User Guide, pp. 490–491.

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1 concern type of non-NS.”²³ This means USCIS’s algorithm could potentially overstate the
2 number of applications subject to CARRP if the application was deemed Non-NS.

3 16. Previous summary data provided by USCIS in response to Interrogatory No. 3
4 (“IROG 3 Data”) designated the number of applicants purportedly subject to CARRP into the
5 three Concern Types: “KST,” “Non-KST,” and “Non-NS.”²⁴ The IROG 3 Data shows the
6 number of CARRP processed applications by Concern Type for FY 2015–FY 2018 for Forms I-
7 485 and N-400.²⁵ For example, according to the IROG 3 Data, a total of 3,641 Forms I-485 and
8 N-400 were processed under CARRP in FY 2015.²⁶ Of this total, 3,060 Forms I-485 and N-400
9 were designated as Non-NS.²⁷ This means that at least 84.0% of Forms I-485 and N-400 that
10 were identified as being subject to CARRP with an initial Concern Type of KST or Non-KST
11 were determined to be Non-NS Concerns.

12 17. The Updated USCIS Detailed Data did not contain fields for the four Sub-statuses
13 or three Concern Types. In the 30(b)(6) deposition, USCIS acknowledged that it could update
14 the Updated USCIS Detailed Data to add the four Sub-statuses and the three Concern Types.²⁸ If
15 provided with Updated USCIS Detailed Data including the four Sub-statuses and the three
16 Concern Types identified for each application, I would be able to: 1) calculate mean and median
17 processing times; and 2) calculate approval and denial rates for applicants categorized into those
18 various Sub-statuses and Concern Types.²⁹

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20 _____
21 ²³ USCIS 30(b)(6) Deposition, p. 155.

22 ²⁴ See for example, 2018-10-16 Defendants’ Spreadsheet re Response to Plaintiffs’ 3rd Interrogatory No. 3.XLSX, tab
23 A – Total CARRP. See also, USCIS 30(b)(6) Deposition, Exhibit I.

24 ²⁵ This data was produced prior to USCIS’s identification of its purported data error and the resulting production of the
25 Updated USCIS Summary Data. I was unable to reconcile the total number of CARRP processed applications from
26 the IROG 3 data to the Original USCIS Data that was produced before USCIS’s production of the Updated USCIS
27 Summary Data. See 2019-11 Wagafe_Internal_Data_FY2013_FY2019 (Confidential Pursuant to Protective Order)
28 Feb6 updates.xlsx.

29 ²⁶ See 2018-10-16 Defendants’ Spreadsheet re Response to Plaintiffs’ 3rd Interrogatory No. 3.XLSX, tab A - Total
30 CARRP, cell Q5.

31 ²⁷ See 2018-10-16 Defendants’ Spreadsheet re Response to Plaintiffs’ 3rd Interrogatory No. 3.XLSX, tab A - Total
32 CARRP, cell Q8.

33 ²⁸ USCIS 30(b)(6) Deposition, pp. 151, 156.

34 ²⁹ According to the FDNS-DS User Guide Release 16.2, CARRP application processing data is also captured and
35 presumably maintained. “As the NS Concern moves forward through the [CARRP] Process there is a series of
36 specialized Process Phases. These include Internal Vetting (found in the Systems Check tab), External Vetting

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1 18. After the 30(b)(6) deposition, it remains unclear to me how an NS Concern case
 2 can be opened but not completed until after the application has been adjudicated (i.e., the Last
 3 Application Status Date). According to the FDNS-DS User Guide, an NS Concern CME should
 4 be closed when:

- 5 a. the applicant’s “NS Concern has been Vetted and Resolved”;
- 6 b. the applicant’s “NS Concern Remains Unresolved and the [Applicant] is
 7 Determined to be Ineligible for the Benefit Sought”;
- 8 c. the applicant’s “KST NS Concern Remains Unresolved but HQ Senior
 9 Leadership and USCIS Deputy Director have Authorized Approval of the Benefit
 10 Sought”;
- 11 d. the applicant’s “Non-KST NS Concern Remains Unresolved but Senior-
 12 Level Official has Authorized Approval of the Benefit Sought”; or
- 13 e. the applicant’s “Case has been transferred to the IJ/ Executive Office
 14 Immigration Review (EOIR) for Decision.”³⁰

15 19. The FDNS-DS User Guide indicates that a USCIS officer should “proceed to
 16 close out [an] NS Concern record” “[a]fter completing the CARRP process and rendering an
 17 adjudicative decision.”³¹ This appears to indicate that a CME Completed Date for a given
 18 application can be on or after the adjudication date.³² However, the FDNS-DS User Guide also
 19 indicates that an “NS Concern record can be closed...prior to the final adjudication of the
 20 application/petition.”³³ Given these seemingly inconsistent FDNS-DS User Guide procedures
 21 and lack of data regarding how an NS Concern CME case was closed, I am unable to reconcile
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24 (found in the Special Actions tab), Deconfliction (Deconfliction tab), and others... There is also Process Phase control
 25 which requires Supervisory Approvals.” See FDNS-DS User Guide, p. 85.

26 ³⁰ FDNS-DS User Guide, pp. 490-494.

³¹ FDNS-DS User Guide, p. 490.

³² For example, this does not appear to explain a 190-day lag time from adjudication date to CME Completed Date.
 See “newid 07E1SJEOOP,” in the Updated USCIS Detailed Data.

³³ FDNS-DS User Guide, p. 491.

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1 why NS Concern cases that were opened but not completed until after adjudication, or remained
2 open after adjudication exist in the Updated USCIS Detailed Data.³⁴

3 20. Based on my analysis and the 30(b)(6) deposition of USCIS, I am able to
4 conclude that: 1) USCIS did not review underlying documents to confirm whether a given
5 application was processed under CARRP; 2) the use of USCIS's algorithm appears to overstate
6 the number of applications processed under CARRP and fails to differentiate between
7 applications based on Sub-status and Concern Type fields in FDNS-DS; 3) it is unclear how an
8 NS Concern case can be opened but not completed until after the application has been
9 adjudicated, or remain open after adjudication; and 4) if I were provided the Sub-status and
10 Concern Type fields contained in FDNS's database(s), I would be able to calculate mean and
11 median processing times and approval and denial rates for applications subset into various
12 categories, including for applicants: (a) where an NS Concern was not confirmed; (b) where the
13 NS Concern was confirmed; (c) where the NS Concern was resolved prior to adjudication, and
14 (d) where the NS Concern was not resolved prior to adjudication.³⁵

15 **B. Additional High-level Data Validation Procedures and Analyses**

16 21. In my February Report and Supplemental Report, I identified data inconsistencies
17 or anomalies as a result of my analyses to date.³⁶ For example: 1) why certain applications that
18 were identified as CARRP in the Original USCIS Data are no longer identified as CARRP in the
19 Updated USCIS Detailed Data;³⁷ and 2) why it appears that certain applications in the Class Lists
20 do not appear in the Updated USCIS Detailed Data.³⁸ I performed additional high-level data
21 validation procedures in response to USCIS's 30(b)(6) deposition.

22
23 ³⁴ The Updated USCIS Detailed Data contains records with no CME Completed Date even though the applications
24 have been adjudicated. See for example, "newid 72NR2MMC5Y," in the Updated USCIS Detailed Data. See also,
25 USCIS 30(b)(6) Deposition, Exhibit C3.

26 ³⁵ If I were provided the last known phase of CARRP processing for each application, I could also potentially identify
which applications were adjudicated during internal vetting, external vetting, deconfliction, etc. or not subject to
CARRP.

³⁶ It is unclear how the review, analysis, and results of Defendants' Expert Dr. Bernard R. Siskin address many of
these inconsistencies or anomalies.

³⁷ See my Supplemental Report, ¶ 15.

³⁸ See my Supplemental Report, ¶ 59.

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1. Identification of Potential Duplicate Records

22. I understand that the Updated USCIS Detailed Data was queried from multiple databases maintained by USCIS.³⁹ The results of these queries from multiple databases were combined for the purposes of this litigation.⁴⁰ According to USCIS’s 30(b)(6) deposition, the Updated USCIS Detailed Data is comprised of application data from:

- a. CLAIMS 3 (“C3”);
- b. CLAIMS 4 (“C4”);
- c. Electronic Immigration System (“ELIS”);
- d. Central Index System (“CIS”); and
- e. Fraud Detection and National Security Data System (“FDNS-DS”).⁴¹

23. Data from C3, C4, ELIS, and CIS was queried by Mr. Shinaberry, while FDNS-DS was queried by the Fraud Detection and National Security Directorate (“FDNS”).⁴² FDNS provided the results of its query to Mr. Shinaberry.⁴³ To combine the results of the various queries, Mr. Shinaberry used an application’s A-Number.⁴⁴

24. According to USCIS, the data was checked for duplicates “both at the end of each query in each of those systems” and “then again after combining [the application data].”⁴⁵ USCIS’s 30(b)(6) witness testified that after the application data was combined, USCIS ran “a small program that sorts the [application data from various databases] by application number, and [the program] essentially just makes sure that there’s one instance of that application.”⁴⁶ Subsequent to USCIS checking for duplicate records, USCIS removed the corresponding

³⁹ USCIS 30(b)(6) Deposition, p. 35; 2020-06_Wagafe_Internal_Data_FY2013-2019_(Confidential_Pursuant_to_Protective_Order).xlsx.

⁴⁰ USCIS 30(b)(6) Deposition, pp. 22–23 (“A. So I have queried USCIS’ adjudicative information systems and matched up the results of those queries -- for fiscal year ’13 to ’19 receipts with data from FDNS to identify applications that were subject to CARRP processing... Q. So you played the primary responsibility for creating the data that has been produced by Defendants in this case, Wagafe versus Trump? A. That’s correct.”)

⁴¹ USCIS 30(b)(6) Deposition, pp. 35–37.

⁴² USCIS 30(b)(6) Deposition, p. 35.

⁴³ USCIS 30(b)(6) Deposition, pp. 18, 33 110–111.

⁴⁴ USCIS 30(b)(6) Deposition, pp. 39–40.

⁴⁵ USCIS 30(b)(6) Deposition, p. 93.

⁴⁶ USCIS 30(b)(6) Deposition, pp. 93–94.

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1 application number and assigned each unique application an anonymize identifier, or “new ID
2 number.”⁴⁷

3 25. As a result of this unique identifier, I am unable to check for duplicate records
4 based on A-Number, application number, or receipt number. However, when I remove this
5 unique identifier and check for duplicates across the remaining fields, I identified 213,647
6 instances of potential duplicate records. For example, by removing the unique identifier created
7 by Mr. Shinaberry, I identified 24 records with the same: form number (I-485), applicant age
8 [REDACTED], applicant sex (M), applicant country of birth ([REDACTED]), application receipt date ([REDACTED]
9 [REDACTED]), application adjudication status (Pending), application adjudication date ([REDACTED]
10 [REDACTED]), and description of class of admission (Children of Priority Workers). I performed this
11 analysis for various adjudication statuses and presented the top 10 results by number of records
12 identified in the Updated USCIS Detailed Data. See Exhibit BH.

13 2. Data Entry Errors Related to Receipt Date and Current Status Date

14
15 26. According to USCIS’s 30(b)(6) deposition: 1) the Updated USCIS Detailed Data
16 included potential data entry errors;⁴⁸ and 2) as a result, USCIS excluded applications with some
17 date anomalies from its analysis of mean and median processing times.⁴⁹ As USCIS excluded
18 some, but not all, date anomalies, USCIS’s Updated Summary Data includes applications that
19 were adjudicated between 1 and 60 days after application receipt. I understand from counsel for
20 Plaintiffs that this is inconsistent with a reasonable expectation of the time it usually takes to
21

22 ⁴⁷ According to USCIS’s 30(b)(6) witness, “[n]ew ID is an anonymized identifier in lieu of something like receipt
number.” See USCIS 30(b)(6) Deposition, p. 85.

23 ⁴⁸ These data entry errors appear to be consistent with the finding of a FY2014 INSITE Review of CARRP. This
24 finding indicated that 9 out of 129 USCIS offices responded “No” to the following question: “Is information on the
adjudicative action(s), under the ‘Forms’ tab in the FDNS-DS records, complete and accurate for every form
25 identified in the A file/ Receipt file?” See USCIS FY2014 INSITE Review Results—CARRP Assessment, December
2014 (DEF-00147440), p. 4.

26 ⁴⁹ USCIS 30(b)(6) Deposition, p. 207. USCIS’s 30(b)(6) witness estimated that the number of records “with zero or
negative processing times is a very small number. Out of all 10.6 million applications, I believe it’s probably a few
hundred.” See USCIS 30(b)(6) Deposition, pp. 205–206. Based on my analysis, I identified 4,723 records that
indicate the application was received on or before September 30, 2019 and where the last status date is before
September 30, 2019 and before the receipt date.

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1 adjudicate an I-485 or N-400 application. As a result, I analyzed the number of applications that
2 were adjudicated between: 1–30 days after receipt and in 30 day increments thereafter (e.g., 31–
3 60 days, 61–90 days) until 180 days after receipt. In order to ensure I was analyzing all
4 adjudications, my analysis also included a total for the number of applications adjudicated more
5 than 180 days after receipt.

6 27. Based on the results of my analysis, I identified 96,571 Forms I-485 and N-400
7 applications that were adjudicated between FY 2013 and FY 2019 in fewer than 61 days. I
8 performed this analysis by form type (I-485 and N-400) and by CARRP and Not-CARRP
9 processed. See Exhibit BI.

10 28. I declare under penalty of perjury that the foregoing is true and correct. Executed
11 this 21st day of September 2020 in Chicago, IL.

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13 

14 _____
SEAN M. KRUSKOL

EXHIBIT BF

Sean M. Kruskol, CPA/CGMA, CFE Principal

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SUMMARY

Mr. Kruskol has addressed forensic accounting, valuation, causation, and economic damages issues in a wide variety of commercial disputes, generally involving large-scale data analytics. He is a Certified Public Accountant (CPA), Chartered Global Management Accountant (CGMA), and a Certified Fraud Examiner (CFE). In dispute-related matters, Mr. Kruskol's clients have included both public and private companies in professional services, manufacturing, pharmaceutical, banking, real estate, healthcare, insurance, entertainment, and technology industries. In investigation-related matters, he has examined financial reporting fraud, Ponzi schemes, asset misappropriation, and other forms of corporate misconduct. He has performed his work in nine different countries across three different continents.

ACADEMIC BACKGROUND

2006–2007	Miami University (Ohio) <i>M.Acc., Accounting</i>	Oxford, Ohio
2003–2007	Miami University (Ohio) <i>B.S., Accounting</i>	Oxford, Ohio

PROFESSIONAL EXPERIENCE

2013–Present	Cornerstone Research, Inc. <i>Principal</i>	Chicago, Illinois
2011–2013	Navigant Consulting, Inc. <i>Managing Consultant</i>	Chicago, Illinois
2010–2011	Ryan Specialty Group <i>Director of Finance - Wholesale</i>	Chicago, Illinois
2007–2010	KPMG <i>Senior Associate</i>	Chicago, Illinois

**Sean M. Kruskol, CPA/CGMA, CFE
Principal**

REPRESENTATIVE CONSULTING MATTERS

Breach of Contract Disputes

Analyzed the costs incurred by a client on a failed software implementation project. Analyzed thousands of general ledger transactions over a 6-year+ period.

Calculated pre- and post-judgment interest on damages awarded in breach of contract matter.

Provided financial and accounting consulting services in a dispute involving a lost-profits claim due to breach of contract in an entertainment-industry lawsuit.

Assisted counsel with analyzing damages related to an alleged breach of contract on the sale of services for tens of thousands of hardware devices for a technology company.

Assisted counsel with calculating damages and responding to a breach of contract and fraudulent inducement claim over the sale of a manufacturing facility.

Calculated pre-judgment interest on potential damages related to a breach of contract matter.

Accounting and Auditing

Evaluated financial statements and disclosures for compliance with accounting frameworks (US GAAP and IFRS), GAAS literature (US GAAS and ISA), and SEC filing requirements in various matters across multiple industries.

Analyzed and critiqued claimant's \$400 million damages claim in an accounting malpractice dispute. Analyzed the timing and causes of plaintiff's deteriorating financial condition and bankruptcy.

Assisted counsel with evaluating the SEC's claims that two auditors were professionally negligent when overseeing the audit of a Brazilian subsidiary of a large manufacturer.

Provided audit services to clients in the Consumer Products and Financial Services industries. Work included the auditing of revenue transactions under SAB 104 and related revenue recognition accounting literature.

Assisted counsel with the defense of a former independent auditor against claims brought by third party lending institutions.

Recalculated interest amounts on various post-acquisition dispute matters.

Data Analytics

Used SQL to analyze a hundred million+ transactional records for a large global automotive manufacturer to study the timing of vehicle sales.

Used SQL to analyze billions of transactional records for a large on-line retailer to study customer behavior.

Used SQL to analyze a billion+ records related to components of computer hardware for a computer manufacturer to study component costs.

Used SQL and SAS to analyze millions of Medicare, Medicaid, and other insurance related claims for various healthcare services including prescription drugs, surgical procedures, and other medical procedures on various cases.

**Sean M. Kruskol, CPA/CGMA, CFE
Principal**

Used SQL to analyze millions of transactional records for a large global manufacturer to study the timing of payments to vendors.

Used SQL to analyze millions of journal entries to find patterns of non-standard journal entries.

Consistently used Computer Assisted Audit Techniques (CAATs) to address fraud risks for clients. Specifically, used ACL and IDEA stored procedures to run analyses regarding Benford's Law, Phantom Employees and Vendors, Accounts Receivable / Payable Aging, and General Ledger entries.

Assisted a large titanium and steel-alloy forging company in assessing potential liability allegations that the company failed to pay proper wages. Used the company's payroll and timekeeping data sets to quantify potential liability based on applicable state laws.

Assisted in the review of qui tam allegations involving the False Claims Act regarding Medicaid claims paid by the Federal Government. Responsibilities included database creation and analysis of Medicaid claims as well as analyzing the plaintiff's sampling methodology. Further responsibilities included drafting text and exhibits for the expert report.

As part of a Fraud in the Audit (FITA) rotation, used Computer Assisted Audit Techniques (CAATs) software to import, validate, analyze, and report on the fraud risk associated with millions of journal entries.

Forensic Investigations

Assisted a Special Committee of the Board of Directors for a global automotive manufacturing company by analyzing the timing of revenue recognition associated with six years of vehicle sales.

Analyzed the quarterly accounts payable balance for a global manufacturing company to assist counsel in responding to issues raised by the SEC.

In a post-acquisition dispute, assisted counsel in investigating and reporting on a potential seven-year earnings management scheme.

Analyzed customer bank account activity to identify patterns evidencing transactions consistent with the customer's Ponzi scheme.

Analyzed corporate bank account activity for a loan originator and servicer to identify patterns in cash transfers between operating and fiduciary accounts.

Assisted the Chief Accounting Officer and Internal Audit for the Australian subsidiary of a billion-dollar logistics company with an earnings management investigation and financial statement reconstruction, addressing allegations of improper accounting procedures. Assisted in the development of comprehensive analyses related to the impact of accounting errors on the company's statutory financial statements.

Assisted counsel in investigating a whistleblower complaint related to allegations of improper conduct related to promotional allowance activity in the retail industry.

Assisted the audit committee in investigating claims of improper revenue recognition practices on a long-term government contract.

Assisted the EMEA Controller of a former Fortune 300 brokerage company in the performance of accelerated audits for multiple subsidiaries in four different countries over a period of two and a half months.

**Sean M. Kruskol, CPA/CGMA, CFE
Principal**

Assisted counsel of a global financial services company by analyzing electronic evidence to support a multi-faceted investigation regarding alleged theft of trade secrets. Conducted an analysis of the targets' web-based email, instant messaging, internet browsing history, phone logs, and other electronic evidence.

Other Consulting and Industry Experience

Assisted the Interim CFO of the Australian subsidiary of a billion-dollar logistics company by providing advice on technical accounting matters, coordinating year-end audit preparation with the external auditors, delegating tasks to support staff, and participating in monthly management meetings.

Led financial due diligence on potential acquisition targets in the wholesale insurance industry, modeled results of financial due diligence, and presented findings to the CEO, CFO, and Business-Unit Presidents.

Performed recalculation of interest on short-term and long-term debt for various audit clients.

Created and used various financial planning and analysis tools and templates for a business segment of a start-up company.

Performed security administrator duties for a start-up company's ERP, Microsoft Great Plains, and expense reimbursement tool, Concur Expense.

Served as a member of the implementation team for Microsoft Great Plains and Concur Expense for a start-up company.

**Sean M. Kruskol, CPA/CGMA, CFE
Principal**

CERTIFICATIONS

Certified Public Accountant (CPA). Illinois license number: 065-035214

Chartered Global Management Accountant (CGMA)

Certified Fraud Examiner (CFE)

SPEAKING ENGAGEMENTS

Illinois CPA Society – 2020 Annual Summit August 2020
Simple Questions and Complex Fraud: A Primer

Chicago Bar Association – Startup Bootcamp April 2017
Panelist

Miami University Farmer School of Business, Masters of Accountancy Program. October 2009
Invited Guest Speaker. Topic related to integrity, leadership, and transparency.
First M.Acc. alumnus to be invited back to formally speak to graduate students

TEACHING/INSTRUCTION

Olin Business School at Washington University in St. Louis, Undergraduate Finance 2015–Present
Recurring guest lecturer on modeling damage scenarios

Justice Entrepreneurs Project 2013–2016
Guest presenter on budgeting for solo and small law firms

Excel and Access Training for new consultants at Navigant 2012–2013
Taught intermediate Excel/Access functionality and overall data management

Computer Assisted Audit Techniques (CAATs) Seminar at KPMG 2008–2009
Instructed on data import, analysis, and interpretation

Ernst & Young Business Excellence Summit at Miami University September 2008
Small group leader and discussion facilitator

PUBLICATION

“Efficiencies Defense Newly Viable After T-Mobile/Sprint Ruling” with Russell Molter, Breno De Castro Vieira, and Michael Hilfiker *Law360*, March 13, 2020; *The National Law Review*, July 2, 2020 Volume X, Number 184

PROFESSIONAL MEMBERSHIPS

Member, American Institute of Certified Public Accountants

Member, Illinois CPA Society

Member, Association of Certified Fraud Examiners

Associate Member, American Bar Association

**Sean M. Kruskol, CPA/CGMA, CFE
Principal**

PROGRAMMING LANGUAGES USED IN LITIGATION MATTERS

SQL, SAS, R, and VBA

OTHER PROGRAMMING LANGUAGES

Java and COBOL

OTHER ACTIVITIES

Illinois CPA Society, Audit & Assurance Services Committee, Member	2017–Present
Illinois Legal Aid Online Board Member, Exec. Committee Member	2017–Present
Illinois Legal Aid Online Board Member, Secretary	2019–Present
Illinois Legal Aid Online Board Member, Treasurer	2017–2019
Illinois Legal Aid Online Board Member, Finance Committee Member	2016–Present
Justice Entrepreneurs Project – Chicago, Advisory Board Member	2016–Present
Illinois Legal Aid Online YPB, Executive Committee Member	2013–2016

AWARDS AND RECOGNITION

Illinois CPA Society Distinguished Service Award	2018–2019
Illinois CPA Society, <i>Insight Magazine</i> , IN Play: Q&A	Winter 2019

Exhibit BG

Documents Considered

Additional documents considered since my July 17, 2020 report are in **bold**.

Legal Pleadings

Complaint, *Abdiqafar Wagafe, et al., v. United States Citizenship Immigration Services, et al.*, 1/23/17
Amended Complaint, *Abdiqafar Wagafe, et al., v. Donald Trump, et al.*, 2/1/17
Plaintiffs' First Requests for Production to Defendants, 8/1/17
Order Granting Class Certification, 6/21/17
Declaration of James W. McCament in Support of Defendants' Response to Plaintiffs' Motion to Compel, 10/10/17
Defendants' Objections and Responses to Plaintiffs' Fifth Request for Production of Documents and Third Interrogatory, 10/16/18
Defendants' Motion for Limited Protective Order, 3/1/18
Order Granting in Part and Denying in Part Plaintiffs' Motion to Compel Production of Documents, 10/19/17
Order Granting in Part and Denying in Part Plaintiffs' Motion to Compel and Defendants' Cross-Motion for a Protective Order, 7/9/19

Depositions

Deposition Testimony and Exhibits 54–67 of Daniel Renaud, 1/10/20
Deposition Testimony and Exhibits A–I of USCIS's Witness Kevin M. Shinaberry, 8/31/20

Expert Reports

Expert Report and Exhibits of Bernard R. Siskin, 2/28/20
Amended Report and Exhibits of Bernard R. Siskin, 7/17/20

Produced Data

Class List as of 4/12/18 (Class List (as of Apr. 12 2018) with Race Religion (002) ATTORNEYS EYES ONLY (Defendant's counsel sent via email on 10-24-2018).xlsx)
Class List as of 6/30/18 (Class List (as of June 30, 2018) (Confidential Attorney Eyes Only) (password protected).xlsx)
Class List as of 9/30/18 (Class List (as of September 30, 2018) (FOUO - Do Not Distribute Outside USG).xlsx)
Class List as of 12/31/18 (Class List (as of December 31, 2018) (Confidential - Attorney Eyes Only).xlsx)
Class List as of 3/31/19 (Class List (as of March 31, 2019) (Confidential - Attorney Eyes Only).xlsx)
Class List as of 6/30/19 (Class List (as of June 30 2019) (Confidential - Attorney Eyes Only).xlsx)
Class List as of 9/30/19 (Class List (as of Sept. 30, 2019) (Confidential - Attorney Eyes Only).xlsx)
2019-07-26 - Wagafe - USCIS_data_FY2013_to_FY2019.xlsx
2019-11 Wagafe_Internal_Data_FY2013_FY2019 (Confidential Pursuant to Protective Order) Feb6 updates.xlsx
2018-10-16 Defendants' Spreadsheet re Response to Plaintiffs' 3rd Interrogatory No. 3.XLSX
Records #48 FOIA Response.pdf
DEF-00072676 - CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER.xlsx
DEF-00131632.pdf
DEF-00156511 - CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER.xlsx
DEF-00038830.xlsx
DEF-00044519.pdf
2020-06_Wagafe_Internal_Data_FY2013-2019_(Confidential_Pursuant_to_Protective_Order).xlsx
USCIS_Data_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv
data_dictionary – Subject to Attorneys' Eyes Only Protective Order.xlsx

Exhibit BG

Documents Considered

Additional documents considered since my July 17, 2020 report are in **bold**.

Public Materials

Form N-400 and Instructions, available at <https://www.uscis.gov/n-400>

Form I-485 and Instructions, available at <https://www.uscis.gov/i-485>

USCIS Affirmative Asylum Application Statistics and Decisions Annual Report, 6/20/16, available at <https://www.dhs.gov/sites/default/files/publications/U.S.%20Citizenship%20and%20Immigration%20Services%20-%20Affirmative%20Asylum%20Application%20Statistics%20and%20Decisions%20Annual%20Report%20-%20FY%202016.pdf>

Department of Homeland Security Yearbook of Immigration Statistics, FY 2017–FY 2018, available at <https://www.dhs.gov/immigration-statistics/yearbook>

DHS/USCIS Privacy Impact Assessment for the Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR), 7/26/18, available at <https://www.dhs.gov/sites/default/files/publications/privacy-pia-uscis-023b-eciscor-july2018.pdf>

USCIS Historical Processing Times, available at <https://egov.uscis.gov/processing-times/historic-pt>

"Data preprocessing in detail," IBM Developer, 6/14/19, available at <https://developer.ibm.com/technologies/analytics/articles/data-preprocessing-in-detail>

Memorandum from Jonathan Scharfen, Deputy Director of USCIS to Field Leadership, "Policy for Vetting and Adjudicating Cases with National Security Concerns," 4/11/08, available at https://www.uscis.gov/sites/default/files/USCIS/About%20Us/Electronic%20Reading%20Room/Policies_and_Manuals/CARRP_Guidance.pdf

United States Code, Title 8—Aliens and Nationality, § 1571–1572, effective 10/17/00

Code of Federal Regulations, Title 8, Chapter I, Subchapter C, §335.6 Failure to appear for examination, amended 8/29/11

Code of Federal Regulations, Title 8, Chapter I, Subchapter C, §335.10 Withdrawal of application, amended 8/29/11

Code of Federal Regulations, Title 8, Chapter I, Subchapter C, §337.10 Failure to appear for oath administration ceremony, 9/24/93

Adjudicator's Field Manual - Redacted Public Version, Chapter 10.3 General Adjudication Procedures

Adjudicator's Field Manual - Redacted Public Version, Chapter 10.5 Requesting Additional Information

Adjudicator's Field Manual - Redacted Public Version, Chapter 15.1 Interview Policies

Adjudicator's Field Manual - Redacted Public Version, Chapter 20.4 Petition Withdrawal

USCIS Policy Manual, Volume 12, Part B, Chapter 4 Results of the Naturalization Examination, current as of 2/24/20

USCIS Policy Manual, Volume 7, Part A, Chapter 11 Decision Procedures, current as of 2/26/20

Privacy Impact Assessment Update for the Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, 3/25/16, available at <https://www.dhs.gov/sites/default/files/publications/privacy-pia-uscis-claims3appendixupdated-september2019.pdf>

Privacy Impact Assessment Update for the Computer Linked Application Information Management System 4 (CLAIMS 4), 11/5/13, available at <https://www.dhs.gov/sites/default/files/publications/privacy-pia-update-uscis-claims4-november2013.pdf>

Privacy Impact Assessment for the USCIS Electronic Immigration System (USCIS ELIS), 5/17/16, available at <https://www.dhs.gov/sites/default/files/publications/privacy-pia-uscis-elisappendixaupdate-may2018.pdf>

A Guide to Naturalization, revised 11/16, available at <https://www.uscis.gov/sites/default/files/files/article/M-476.pdf>

Exhibit BG

Documents Considered

Additional documents considered since my July 17, 2020 report are in **bold**.

Annual Report on the Impact of the Homeland Security Act on Immigration Functions Transferred to the Department of Homeland Security, 4/13/18, available at <https://www.uscis.gov/sites/default/files/reports-studies/Annual-Report-on-the-Impact-of-the-Homeland-Security-Act-on-Immigration-Functions-Transferred-to-the-DHS.pdf>

Trends in Naturalization Rates: FY 2014 Update, 11/16, available at <https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports/Trends-in-Naturalization-Rates-FY14-Update.pdf>

USCIS Form I-485 Performance Data, FY 2016–FY 2019

USCIS Form N-400 Performance Data, FY 2016–FY 2019

The World Factbook, Central Intelligence Agency, available at <https://www.cia.gov/library/publications/the-world-factbook/>

Statement on Standards for Forensic Services, No. 1, effective for engagements accepted on or after 1/1/20, available at <https://www.aicpa.org/content/dam/aicpa/interestareas/forensicandvaluation/resources/standards/downloadable-documents/ssfs-no-1.pdf>

Lawful Permanent Residents (LPR), U.S. Department of Homeland Security, updated 2/24/20, available at <https://www.dhs.gov/immigration-statistics/lawful-permanent-residents#:~:text=>

Citizenship Through Naturalization, U.S. Citizenship and Immigration Services, updated 4/17/19, available at <https://www.uscis.gov/us-citizenship/citizenship-through-naturalization#:~:text=>

USCIS Policy Manual, Volume 12, Part A, Chapter 2 Becoming a U.S. Citizen, current as of 2/26/20

USCIS Policy Manual, Volume 7, Part A, Chapter 4 Documentation, current as of 2/26/20

USCIS Policy Manual, Volume 7, Part A, Chapter 5 Interview Guidelines, current as of 2/26/20

USCIS Policy Manual, Volume 7, Part A, Chapter 6 Adjudicative Review, current as of 2/26/20

USCIS Policy Manual, Volume 7, Part A, Chapter 10 Legal Analysis and Use of Discretion, current as of 2/26/20

USCIS Policy Manual, Volume 12, Part B, Chapter 2 Background and Security Checks, current as of 2/26/20

USCIS Policy Manual, Volume 12, Part B, Chapter 3 Naturalization Interview, current as of 2/26/20

USCIS Glossary, for entries "Reject (as compared to denial)" and "Fiscal year," available at <https://www.uscis.gov/tools/glossary>

Pew-Templeton Global Religious Futures Project–Palestinian territories, Pew Research Center, available at http://www.globalreligiousfutures.org/countries/palestinian-territories#/?affiliations_religion_id=0&affiliations_year=2010®ion_name=All%20Countries&restrictions_year=2016

Arabia, Encyclopædia Britannica, Britannica Group, Inc., updated 11/20/19, available at <https://www.britannica.com/place/Arabia-peninsula-Asia>

Yugoslavia, Encyclopædia Britannica, Britannica Group, Inc., updated 2/22/19, available at <https://www.britannica.com/place/Yugoslavia-former-federated-nation-1929-2003>

Note: Even if not included in this list, I also considered and relied upon any other documents cited in my report or exhibits.

Duplicate Records in the Updated USCIS Detailed Data^[1]

Pending, Approved, and Denied Applications

Record Count ^[2]	form_number	ben_age	ben_sex	race	receipt_date	rec_fy	current_status	current_status_date	current_status_fy	rec_adj_proc_tm	fy_2018_pen_proc_tm	fy_2019_pen_proc_tm	cis_class_of_admission	coa_description	cis_status_of_admission	i485_class_of_admission	i485_coa_description	country_of_birth_name
24	I485	8	M							550	185	550	PEN	PENDING CLASSIFICATION CODE		E10	CHILDREN OF PRIORITY WORKERS	
24	I485	38	F							550	185	550	PEN	PENDING CLASSIFICATION CODE		E19	SPOUSES OF PRIORITY WORKERS	
23	I485	36	F							550	185	550	PEN	PENDING CLASSIFICATION CODE		E19	SPOUSES OF PRIORITY WORKERS	
23	I485	36	F							549	184	549	PEN	PENDING CLASSIFICATION CODE		E19	SPOUSES OF PRIORITY WORKERS	
23	I485	39								278		278	PEN	PENDING CLASSIFICATION CODE				
23	I485	40								278		278	PEN	PENDING CLASSIFICATION CODE				
22	I485	37	F							549	184	549	PEN	PENDING CLASSIFICATION CODE		E19	SPOUSES OF PRIORITY WORKERS	
22	I485	40	M							549	184	549	PEN	PENDING CLASSIFICATION CODE		E18	MULTINATIONS EXEC AND MANAGERS	
21	I485	38	M							550	185	550	PEN	PENDING CLASSIFICATION CODE		E18	MULTINATIONS EXEC AND MANAGERS	
20	I485	37	M							550	185	550	PEN	PENDING CLASSIFICATION CODE		E18	MULTINATIONS EXEC AND MANAGERS	
10	N400	64	F							228			USC	US CITIZEN	USC			
9	N400	61	F							203			USC	US CITIZEN	USC			
9	N400	59	F							227			USC	US CITIZEN	USC			
8	N400	58	F							191			USC	US CITIZEN	USC			
8	N400	56	M							228			USC	US CITIZEN	USC			
7	N400	56	F							128			USC	US CITIZEN	USC			
7	N400	55	M							156			USC	US CITIZEN	USC			
7	N400	57	F							156			USC	US CITIZEN	USC			
7	N400	60	F							198			USC	US CITIZEN	USC			
7	N400	56	M							203			USC	US CITIZEN	USC			
3	I485	24	M							484			PEN	PENDING CLASSIFICATION CODE				
3	I485	32	M							724			RE	REFUGEE		RE8	ADJ OF CH OF A REFUGEE	
3	I485	11	F							455			H4	SPS OR CH OF H1, H2, H3 OR H2R		E28	CHILDREN OF E26	
3	I485	15	M							144			UN	UNKNOWN, NONE, OR NOT REPORTED				
3	I485	15	F							341			H4	SPS OR CH OF H1, H2, H3 OR H2R		E30	CHILDREN OF E36, E37	
2	N400	26	M							132			USC	US CITIZEN	USC			
2	N400	76	F							228			USC	US CITIZEN	USC			
2	N400	52	F							329			USC	US CITIZEN	USC			
2	N400	50	M							182			S26	PERM RES SPEC AGRIC WORKER GROUP2		LPR		
2	N400	93	F							212			IR5	PARENT OF US CITIZEN		LPR		

Source: USCIS_Data_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:
 [1] Columns in the Updated USCIS Detailed Data for which all values are null are excluded from this analysis.
 [2] Application records are sorted by descending record count, ascending receipt date, and ascending beneficiary age.

Duplicate Records in the Updated USCIS Detailed Data^[1]

Pending, Approved, and Denied Applications

Record Count ^[2]	form_number	ben_age	ben_sex	race	receipt_date	rec_fy	current_status	current_status_date	current_status_fy	rec_adj_proc_tm	fy_2018_pen_proc_tm	country_of_citizenship_name	carrp_case_flag	cme_basis_category1	cme_basis_category2	cme_basis_category3	cme_carrp_ind1	cme_carrp_ind2	cme_carrp_ind3	relevant_cme_basis_category	carrp_status_change
24	I485	8	M							550	185		NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
24	I485	38	F							550	185		NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
23	I485	36	F							550	185		NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
23	I485	36	F							549	184		NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
23	I485	39								278		UNKNOWN	NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
23	I485	40								278		UNKNOWN	NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
22	I485	37	F							549	184		NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
22	I485	40	M							549	184		NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
21	I485	38	M							550	185		NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
20	I485	37	M							550	185		NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
10	N400	64	F							228			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
9	N400	61	F							203			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
9	N400	59	F							227			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
8	N400	58	F							191			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
8	N400	56	M							228			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
7	N400	56	F							128			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
7	N400	55	M							156			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
7	N400	57	F							156			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
7	N400	60	F							198			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
7	N400	56	M							203			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
3	I485	24	M							484			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
3	I485	32	M							724			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
3	I485	11	F							455			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
3	I485	15	M							144			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
3	I485	15	F							341			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
2	N400	26	M							132			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
2	N400	76	F							228			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
2	N400	52	F							329			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
2	N400	50	M							182			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO
2	N400	93	F							212			NO	Non-CARRP	Non-CARRP	Non-CARRP	NO	NO	NO	Non-CARRP	NO

Source: USCIS_Data_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:
 [1] Columns in the Updated USCIS Detailed Data for which all values are null are excluded from this analysis.
 [2] Application records are sorted by descending record count, ascending receipt date, and ascending beneficiary age.

Distribution of Processing Times for Adjudicated Applications^[1]

Forms I-485 and N-400

FY 2013–FY 2019

Processing Time (Days) ^[2]	CARRP		Not-CARRP		Total Adjudications	% of Total Adjudications
	Count of Adjudications	% of Adjudications	Count of Adjudications	% of Adjudications		
<i>Form I-485:</i>						
1 – 30	10	0.1%	6,522	0.2%	6,532	0.2%
31 – 60	15	0.2%	76,411	2.0%	76,426	2.0%
61 – 90	29	0.4%	274,665	7.2%	274,694	7.1%
91 – 120	82	1.1%	407,735	10.6%	407,817	10.6%
121 – 150	137	1.8%	437,741	11.4%	437,878	11.4%
151 – 180	166	2.2%	401,823	10.5%	401,989	10.5%
181+	6,975	94.1%	2,233,510	58.2%	2,240,485	58.3%
<i>Form N-400:</i>						
1 – 30	0	0.0%	1,959	0.0%	1,959	0.0%
31 – 60	1	0.0%	11,653	0.2%	11,654	0.2%
61 – 90	7	0.0%	154,504	2.9%	154,511	2.9%
91 – 120	38	0.2%	649,026	12.2%	649,064	12.2%
121 – 150	148	1.0%	879,079	16.6%	879,227	16.5%
151 – 180	296	1.9%	647,766	12.2%	648,062	12.2%
181+	14,880	96.8%	2,963,257	55.8%	2,978,137	56.0%

Source: USCIS_Data_June2020 Confidential Subject to Attorneys Eyes Only Protective Order.csv

Note:

[1] Adjudicated applications includes application records with a current status of "Approved," "Denied," "Admin Closed," "Revoked," "██████████" or "Withdrawn."

[2] Processing time is calculated as the number of days between the receipt date and current status date for a given application. Applications that have a processing time that is less than 1 day (i.e. where the receipt date is the same or after the current status date) are excluded.