UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON

ABDIQAFAR WA	AGAFE, et. al.,)
	Plaintiffs,)
	v.) Case No. 17-CV-0094-RAJ
TRUMP, et al.,)
	Defendants.))

DECLARATION OF CARL GHATTAS

- I, Carl Ghattas, hereby state and declare as follows, pursuant to 28 U.S.C. § 1746:
- 1. I am the Executive Assistant Director of the National Security Branch of the Federal Bureau of Investigation ("FBI"), United States Department of Justice ("DOJ").
- 2. The matters stated herein are based on my personal knowledge, my background, training and experience related to national security matters, my review and consideration of documents and information available to me in my official capacity, and information furnished to me by Special Agents and other employees of the FBI and DOJ. It is also based on information furnished by U.S. Citizenship and Immigration Services ("USCIS") and its employees regarding USCIS' Controlled Application Review and Resolution Program ("CARRP").
- 3. I have been informed that CARRP is an USCIS agency-wide approach for identifying, processing and adjudicating applications and petitions for immigration benefits that involve national security concerns. The FBI, however, does not administer CARRP, which is solely a USCIS program.

- 4. Through the exercise of my official duties, I also have been briefed on the above-captioned lawsuit in which the Court has certified two classes of individuals seeking legal permanent resident status or naturalization. I understand that this matter is proceeding in discovery and that Plaintiffs have served document requests on the Defendants. I have been advised the Defendants have responded to the document requests and asserted objections over privileged information and documents. I also understand that a motion for sanctions has been filed against Defendants based upon USCIS' decision to withhold information from the USCIS A-files pertaining to the named Plaintiffs.
- 5. As explained in more detail in my declaration submitted *ex parte*, *in camera*, the FBI asserts the law enforcement and deliberative process privileges over FBI information contained in the A-files and any other USCIS records pertaining to the five named Plaintiffs in this civil action.

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

Executed this 9th day of April, 2018.

Carl Ghattas

Executive Assistant Director National Security Branch Federal Bureau of Investigation Washington, D.C.

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