

file is not forwarded to the field office until all required background checks are complete, there are certain cases with pending background checks where “the NBC determines that a local field office would be in a better position than the NBC to complete a required background check,” and in such cases, the file may be forwarded to the field office before the completion of all such required checks.

See Attachment (Young Declaration), at ¶ 4.

DATED: November 26, 2019

Respectfully submitted,

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By: /s/ C. Frederick Sheffield
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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE
Civil Action No. 1:17-00998-ESH

I HEREBY CERTIFY that on this 26th day of November, 2019, a true copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing via e-mail to the following:

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United States Department of Justice

ATTORNEY FOR DEFENDANTS

Attachment

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

DR. KUSUMA NIO, et al.,)	
Plaintiffs,)	
)	
v.)	Civil Action No.
)	
UNITED STATES DEPARTMENT OF)	1:17-cv-00998
HOMELAND SECURITY, et al.;)	
)	
Defendants.)	

DECLARATION OF CLAUDIA F. YOUNG

I, Claudia F. Young, make the following declaration, as permitted by Section 1746 of Title 28 of the United States Code. I am aware that this declaration will be filed in the above-captioned civil action with the United States District Court for the District of Columbia. I hereby certify:

1. I am employed by the United States Department of Homeland Security (“DHS”), U.S. Citizenship and Immigration Services (“USCIS”), as Assistant Associate Director of the Field Operation Directorate. Within my position, I oversee the citizenship and naturalization program for USCIS, which includes military naturalizations.
2. I make this declaration based on my personal knowledge, and review of official documents and records maintained by USCIS.
3. I understand that on November 19, 2019, the Government submitted a response to the Plaintiffs’ November 15, 2019 filing, and that the Government’s response contained the following language:

The National Benefits Center (“NBC”) does not release cases to field offices for adjudication until all background checks required by law, regulation, or USCIS policy are complete and up-to-date.

4. In general, this statement is accurate. However, there are certain cases in which the NBC determines that a local field office would be in a better position than the NBC to complete a required background check. In such a case, the NBC may release the case to a field office before all required background checks have been completed. Thus, the fact that the NBC has sent a case to a local field office does not always indicate that all required background checks are complete.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 25th day of November, 2019, at Washington, D.C.



Claudia F. Young
Assistant Associate Director
Field Operations Directorate
U.S. Citizenship and Immigration Services
U.S. Department of Homeland Security