EXHIBIT 110 FILED UNDER SEAL

	Page
UNITED STATES DI	STRICT COURT
WESTERN DISTRICT	OF WASHINGTON
AT SEAT	TLE
ABDIQAFAR WAGAFE, et al., on)
behalf of themselves and others) No. 17-cv-00094 RAJ
similarly situated,)
- · · · · · · · · · · · · · · · · · · ·)
Plaintiffs,)
)
VS.)
)
DONALD TRUMP, President of the)
United States, et al.,)
)
Defendants.)
** CONFIDENTIAL - SUBJECT VIDEOTAPED DE of NADIA R.	POSITION
OCTOBER 8,	2020
OCTOBER 8,	
MAGNA LEGAL (866)624-	SERVICES 6221
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	Page 2
1	APPEARANCES
2	(All parties appearing remotely via Zoom videoconference)
3	
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	Also Present:
14	Caitlin Miller - U.S. CIS and U.S. DHS
	Matt Adams - Northwest Immigrant Rights
15	Project
	Jessica Schau Nelson - U.S. CIS
16	Drew Brinkman - U.S. DOJ
	Leon B. Taranto - U.S. DOJ
17	Brendon Moore
18	
	Videographer:
19	Daniel Katz - Magna Legal Services
20	
21	
22	
23	
24	
25	



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3			
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4			June 29, 2020; 67 pages
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11	12	158	Expert Declaration of Nermeen Arastu dated
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Page 5
                   BE IT REMEMBERED that on Thursday, October 8,
 1
 2
          2020, at 8:12 a.m., before Karen M. Grant, CCR 2155,
          appeared Nadia R. Daud, the witness herein;
 3
                   WHEREUPON, the following proceedings were had,
 5
          to wit:
                               --000--
 7
                   VIDEOGRAPHER: We are now on the record. This
 8
 9
     begins Video 1 in the deposition of Nadia R. Daud in the
     matter of "Abdigafar Wagafe, et al., vs. Donald Trump,
10
     President of the United States, et al.," in the United
11
12
     States District Court, Western District of Washington at
     Seattle.
13
14
               Today is Thursday, October 8th, 2020. Time is
15
     8:12 a.m. This deposition is being taken remotely at the
     request of Perkins Coie, LLP.
16
17
               The videographer is Daniel Katz, the court
18
     reporter is Karen Grant, both of Magna Legal Services. All
     counsel and parties present will be noted on the
19
20
     stenographic record.
21
               Will the court reporter please swear in the
22
     witness.
23
    ///
    ///
24
25
     ///
```



Page 6 NADIA R. DAUD, 1 2 witness herein, having been first duly sworn on oath, 3 was examined and testified as follows: 5 EXAMINATION BY MS. WHIDBEE: 7 Good morning. My name is Paige Whidbee, and I Q. represent the plaintiff. Thank you for taking the time to 8 9 meet with us today. Have you ever been deposed before? 10 11 Α. No. 12 Okay. So just to start, I wanted to go over some general instructions for the deposition today. 13 14 First off, the court reporter is writing down 15 everything that we're saying today, so it's important that we try to avoid talking over each other. So I'll do my best 16 to wait until you're done answering a question to start 17 18 asking my next question, and in return I'll ask that you please wait until I'm done asking my question to give your 19 20 answer. Does that sound fair? 21 Α. Yes. 22 Ο. Great. 23 And for the same reason, it's really important that we give our answers verbally. So instead of nodding 24 25 for "Yes" or shaking your head for "No," just say "Yes" or



- 1 A. Oh, they would be on everything. And I was so
- 2 new, I couldn't -- I was new and I was dealing with my mom,
- 3 that I couldn't -- I just didn't even care, to be honest. I
- 4 didn't care.
- 5 Q. And have you received any nondetermination
- 6 training as a part of your job at USCIS in the Seattle
- 7 office?
- 8 A. I want to say we get like a yearly computer -- I
- 9 feel like we get one of those yearly computer ones that we
- 10 all do that we just, you know, push the button on, but at
- 11 the moment I can't think which one of those that is, and I'm
- 12 sure I just did it recently.
- If we're talking all time at USCIS, I'm -- I'm
- 14 fairly certain USC-- or Refugee Affairs Division did a few
- 15 things separate, and I know Department of State did before
- 16 going to Baghdad.
- 17 O. Okay --
- 18 A. (Inaudible.)
- 19 Q. Oh, pardon me. Go ahead.
- 20 A. That's all I can think of, but I -- nothing.
- 21 Q. The yearly computer training you were just
- 22 mentioning that you take in your current position, is that
- 23 training mandatory?
- 24 A. Yes. But I also can't remember it, which is not
- 25 very good.



```
Page 31
               And is it mandatory in all offices or just in the
 1
     Seattle office?
 2
                   MS. BRAGA: Objection; foundation.
 3
               They're all -- whatever we're taking is probably
          Α.
 4
 5
     mandatory in all offices. But the only one that I can
     remember is sexual harassment and trafficking, and I can't
 6
 7
     remember any of the rest of them.
               (By Ms. Whidbee) Okay. And can you remember the
 8
          Q.
     key take-aways from that yearly anti-discrimination training
 9
     that you were describing on the computer?
10
              No, not at all.
11
              Do you recall receiving something called cultural
12
          Q.
13
     sensitivity training?
14
          A.
             No.
                   MS. WHIDBEE: Okay. I'm going to share my
15
16
     screen here. I'm going to share some images with you that
     were -- are screen shots of training materials that
17
     Defendants produced in discovery.
18
               For the court reporter, I'll ask that we mark this
19
20
     as Exhibit 1.
21
                              (Plaintiffs' Exhibit 1 marked.)
              (By Ms. Whidbee) Do you recognize this training?
22
          0.
             I don't, actually.
23
          A .
          Q.
              Okay. So this was not the computer training that
24
25
     you were discussing previously?
```



- 1 No, unless I just wasn't paying attention.
- Q. Okay. I'm going to pull up one more site to see
- 3 if you recognize it. Do you recognize this slide discussing
- 4 the differences between high- and low-context cultures?
- A. I don't.
- 6 Q. Okay. I will stop sharing the screen.
- 7 As a part of your job in the Seattle office, have
- 8 you received any training on different country conditions,
- 9 organizations, groups, cultural practices and religion in
- 10 other countries?
- 11 A. In Seattle?
- 12 Q. Mm-hm.
- 13 A. So I've arranged trainings in Seattle for the
- 14 office, and I'm trying to think if any were done outside of
- 15 that. I heard that I missed one for Eritrea, but -- and I
- 16 arranged one for Iran and Iraq. No, not -- I don't think
- 17 besides that, though.
- 18 Q. Okay. And you mentioned that you gave a training
- 19 about Iran; is that right?
- 20 A. I arranged for somebody else to give it.
- Q. Do you remember when that was?
- 22 A. Yes. October 2019.
- 23 Q. And to who was that -- to whom was that training
- 24 given?
- 25 A. It was offered to the whole office and FDNS, but I



- 1 don't know if everybody was there, though.
- 2 Q. Okay. So it was not mandatory, then?
- 3 A. I mean --
- 4 MS. BRAGA: Sorry. Objection; foundation.
- 5 A. It was mandatory, but people weren't -- you know,
- 6 people were on leave, people had leave, so -- because after
- 7 it, I had many people contact me to see if they could get --
- 8 get it again, because they wanted it, but I couldn't arrange
- 9 it again.
- 10 Q. (By Ms. Whidbee) Okay. And did you also say you
- 11 arranged for training on Iraq?
- 12 A. So Iraqi, I've just done, in smaller groups, more
- 13 impromptu. And it wasn't like in a massive "for the whole
- 14 office," more as-needed.
- 15 Q. Okay. And how often have you arranged those
- 16 meetings?
- 17 A. Seems like every time an Iraqi case comes up.
- 18 Q. And do officers request those kinds of trainings,
- 19 or are they just given on a regular basis?
- 20 A. They want it. They want it.
- 21 Q. And are you able to arrange a training each time
- 22 an officer requests such a training?
- 23 A. Yeah. And sometimes it's easier to do the
- one-on-ones, because then I can help with that particular
- 25 case better.



Page 36 have found such inaccuracies? 1 I've never heard --2 MS. BRAGA: Objection; foundation, also form, 3 vaque. 4 (By Ms. Whidbee) I'm sorry. Was there an answer? 5 Q. I didn't hear it. 7 Oh. I said I've never heard of anybody. Α. 8 Q. Okay. Shifting gears a little, have you ever 9 heard any of your colleagues at USCIA - S, pardon me - make disparaging statements about applications for immigration 10 11 benefits? A. About --12 MS. BRAGA: Sorry. Objection; form, vaque. 13 What do you mean by "about application"? 14 **A** . (By Ms. Whidbee) Pardon me. I meant about 15 Q. 16 applicants' immigration benefits. 17 A. Yeah. Q. What kind of statements? 18 I mean, I've worked in there a long time, so I 19 A. 20 don't know at what point you want me to --21 Q. Sure. So in your work in the Seattle office, have 22 you heard disparaging statements about applicants for immigration benefits? 23 24 A. Yeah. We had one officer recently get in trouble. I can't remember his exact words, but he came to me with a 25



```
Page 37
1
     question, and he referred to his applicant in a derogatory
2
     term.
         Q. What derogatory term would that be?
 3
         A. I can't even remember how he referred to the
4
5
     applicant. The applicant was Mexican. And he said it twice
     in two different ways, and I reported him immediately. I
6
7
     would have to look at my phone to even remember, because I
8
     wrote it down. But I don't remember it.
9
         Q.
             Who did you report the statements to?
         A. My supervisor.
10
11
         Q.
             And do you know if anything was done as a
     consequence of the report?
12
13
         A. Yeah --
                  MS. BRAGA: Objection --
14
15
                  THE WITNESS: Oh, go ahead.
                  MS. BRAGA: Sorry.
16
              Objection; foundation.
17
         A. I don't know everything that was discussed with
18
     him, but I know that it was addressed with him immediately.
19
20
              I also know he had to apologize to the other
21
     co-worker that was next to me, who was Latina. He claims he
22
     apologized to me too, but he never did. He just avoided me
23
     forever.
24
              And I don't know what went on his record or
25
     anything. I have no idea.
```



```
Page 38
1
         Q.
              (By Ms. Whidbee) And is he still working at
2
     USCIS?
3
              Nope. He's with ICE.
          A.
              Do you know if he had to leave USCIS as a
          Q.
4
5
     consequence of your report?
                   MS. BRAGA: Objection; foundation.
 6
7
              No, I don't. I don't know what happened.
         A .
8
             (By Ms. Whidbee) Okay. Have you heard any other
         0.
9
     disparaging statements about applicants for immigration
     benefits while at your job in the Seattle office?
10
11
          A. We had one officer recently, and I couldn't tell
12
     if he was purposely saying this wrong or trying to be funny
13
     or being derogatory, so I did not report him. I just asked
     him to knock it off. He kept referring to his applicants
14
     very loudly in the hall as "Arab" instead of -- well, (a),
15
16
     he didn't need to refer to their race at all. But . . . I
17
     don't really know how to explain how he was doing it, but it
18
     was extremely annoying. I'm Arab American myself, so it was
     almost like a dagger every time he said it.
19
20
              So I probably should have said something higher
21
     up, but I really couldn't tell if he -- I couldn't tell why
     he was doing it, so I just made it uncomfortable for him,
22
23
     and he stopped.
              And can you recall any other disparaging
24
     statements you've heard for applicants for immigration
25
```



Page 39 1 benefits while in your current position in Seattle? 2 A. In Seattle, no, not about applicants. 3 Okay. Have you heard -- and do you recall ever Q. 4 hearing disparaging statements about applicants for 5 immigration benefits in your previous careers at USCIS? D.C. was good. There was nothing there, ever. 6 7 And I don't know if it was the job, the location, but there 8 was never, ever anything. 9 San Francisco, I started right after 9/11, directly after 9/11, so the January after 9/11. That was a 10 11 terrible time in Immigration. It was a terrible time 12 everywhere, but it was a terrible time in Immigration and a 13 terrible time to be an Arab American in Immigration. I was 14 one of very few. I didn't see any other Arab American names 15 in our email boxes, ever. So the sentiment was pretty harsh 16 at that time. 17 So I know you asked if I heard anything about 18 applicants. It was so common that I don't know how to, 19 like, narrow that down. It was a time of NSEERS, which is 20 when they were registering people from certain countries, 21 which usually tended to be Arabs and Muslims, which they later canceled out. So that was happening, along with 22 23 protesters outside the building because of NSEERS, and it was like hostile on kind of like both ends. 24 I think it was the first two weeks of work, and 25



- 1 they asked me to -- I was working in the Oakland office, and
- 2 they asked me to go to the San Francisco office to -- at
- 3 that time, I think they were like -- I don't know if it was
- 1 like nationally they weren't doing this or -- I don't even
- 5 know -- I wasn't part of like the bigger picture at that
- 6 time.
- But I know people were afraid to proceed with
- 8 Middle Eastern cases, so they asked me to go to the basement
- and go through all these boxes of cases and pull out -- at
- 10 the time, they -- the actual quote was "Arabic-sounding"
- 11 names." Like, I don't even know -- I feel like they were
- 12 I-130s, but at the time I didn't know documents. And there
- were other people through, and they did not know who I was,
- 14 because I was brand-new. So people were definitely saying
- derogatory things that entire -- I think we were there for
- several days doing that, so anything said in those days were
- 17 horrendous. That's just an example.
- 18 Q. And what about after that? Did you continue to
- 19 hear disparaging statements about applicants after that as
- 20 well?
- 21 A. I would say the first year, year and a half was
- 22 bad. It got better. It got better.
- Q. Did you continue to hear disparaging statements
- about applicants for immigration benefits even after it got
- 25 better?



```
Page 41
              I'm sure -- let me think. I mean, things would be
1
2
     said in trainings. I mean, it could go on for a while. I'm
     not thinking of exact examples. I'm -- it's more the --
 3
     well, pardon me. I was thinking of examples.
 4
5
              It took some time. By -- I will say this. By the
6
     time I left, they allowed me to have a speaker come in to --
7
     to train the office on their cultural background and
8
     interviewing Arab applicants by the time I left, so
9
     San Francisco did get a training.
10
              And why --
          Q.
11
                   MS. BRAGA: Sorry. Can I just interrupt for
     one second? Before you ask the next question, we're coming
12
     up to 90 minutes pretty soon, so (inaudible) a good place to
13
14
     stop for our first break?
15
                   MS. WHIDBEE: Sure. I'll get to a stopping
     point in just a couple minutes.
16
17
                   MS. BRAGA: Okay. Thank you.
              (By Ms. Whidbee) Why did you want to bring in
18
          Q.
     that speaker that you just referenced to talk to the SF
19
20
     office?
21
              Just I -- it wasn't -- for me, it wasn't just
          A.
22
     INS/USCIS that I had problems with. With my own background,
     I also had problems with Department of State. So -- and my
23
24
     mom knew this, and she kept saying, "You can leave and
25
     everything will stay the same, or you can stay and make a
```



Page 42 1 difference." So I kept thinking: If I stay, I have to make 2 a difference. 3 So I, with San Francisco, I joined their, we call 4 it -- in the USCIS, we call it Special Emphasis Program 5 Manager, which is like the people that do Women History Month and Black History Month, and, you know, there's no 6 7 Arab History Month, but I forced one on them. And I was in 8 charge of Women History Month, and so I snuck in -- on top 9 of Women History Month, I snuck in the Arab training, partly 10 because we had a very large Arab caseload in San Francisco, 11 and so I thought --12 Because towards -- towards the end of me leaving, 13 I started being the person that everybody was coming to to say: "Is this normal in a, like, an Arab marriage? Is this 14 15 normal with, in Islam, to have this in a marriage? Is this 16 normal?" So I started being the person everybody was asking 17 those cultural norms. (I'm not necessarily an expert on all 18 those things, but I was the closest thing they had, so I 19 thought maybe we should get an expert. 20 And could you describe a little bit the problems Q. 21 you mentioned you had with INS, USCIS, and DOS? Well, starting with DOS, it was security clearance 22 A. 23 issues. I think any Arab in government would say: That's where we start with our problems, is security clearance 24 25 issues, and DHS being the same. We just get checked a lot



- 1 more than anybody else, and our questions are different than
- 2 anybody else's. Where some people get checked every five
- years, we get looked at more like yearly, which is fine.
- 4 There's nothing to look at.
- As for work, as I was seeing with the protesters,
- 6 simple things. Like the protesters of NSEERS, that had
- 7 nothing to do with me, but the head of the office would
- 8 publicly accuse them of being my friends, multiple times in
- 9 meetings and over cubicle walls.
- 10 What else. I mean, even my welcome to Seattle
- 11 was an officer, who is clearly not my friend, showed up in
- my office and -- and I still don't understand what the point
- of this was. I think he knew my previous job was Refugee
- 14 Affairs Division, and he -- I don't know if he was attacking
- 15 that or attacking that I was Arab. (I don't know which one
- 16 it was, but -- and he was saying that all we brought was
- 17 Muslim refugees, and we needed to stop doing that, and that
- we weren't bringing the Christians, and we should be
- 19 bringing the Christian refugees. And then he left my
- office.
- And then the next day, he shows up again, doing
- 22 the same thing. So then I said -- oh. And the second day,
- 23 he said -- he referred to them as Syrians, and I said:
- 24 "Well, actually, I'm Syrian Christian. And my family's
- still there, and they actually don't want to leave." So I



```
Page 44
 1
     don't remember how that all happened, but that was the
 2
     welcome to the office.
              And then not too long after that, that same quy,
 3
     in front of an entire training, pulled up pictures to prove
 4
 5
     that I wasn't Syrian. He pulled up pictures of refugees on
     boats and running from Syria to say that I didn't look
 6
 7
     Syrian, so I couldn't be Syrian. So unnecessary, but in
 8
     front of a whole training. It was ridiculous.
9
              So there's some weird stuff in different areas,
     and I don't know why. But none of that ever happened in
10
11
     D.C. That's a highlight.
          Q. And did you report any of that person's statements
12
13
     that you were just talking about?
          A. Yeah, I did. Not -- not what he did in the
14
     beginning, because it was like my first few days. I didn't
15
     even know who he was. But the -- in front of the training,
16
17
     yes, I did report it.
          Q. And do you know if anything was done as a
18
     consequence of you reporting what happened?
19
20
                   MS. BRAGA: Objection; foundation.
21
          A. I don't know. (I just know that I never had to do)
22
     a training with him again.
23
         Q. (By Ms. Whidbee) And is that person still working
     at USCIS?
24
25
         A.
              Yes.
```



```
Page 45
                   MS. WHIDBEE: Okay. Okay. I think we're good
 1
 2
     to go off the record and take a break.
                   MS. BRAGA: Okay. Thank you.
 3
                   VIDEOGRAPHER: The time is 9:45 a.m. We're
 4
 5
     off the record.
                               (Deposition at recess.)
 7
                   VIDEOGRAPHER: 10:01 a.m., we're back on the
 8
     record.
              (By Ms. Whidbee) Okay. I wanted to ask you a
9
          Q.
     couple of follow-up questions about what we were just
10
11
     discussing. You were talking about the person who kind of
12
     greeted you when you first got to the Seattle office and
     gave that training that you reported him about. What is
13
14
     that person's position at USCIS?
             He's with FDNS.
15
          A.
16
              And who is that person? What is their name?
          Q.
17
              Okay. And you also mentioned NSEERS. Could you
18
     describe a little bit what NSEERS is, or was?
19
20
                   MS. BRAGA: Objection. To the extent that the
21
     response will call for third-agency law enforcement
     privileged information, I direct the witness not to answer.
22
23
     Otherwise, she can answer. Also foundation.
24
          A. Well, NSEERS is a system or database or something
25
     that they use to get bio-- basically, at that time, they
```



Page 46 asked to register any -- people from certain countries. 1 2 This was after 9/11, so at first it was people from certain 3 countries. They would list out these certain countries that were not Green Card holders or citizens, that were in the 4 5 U.S., and they asked them to come and get registered, and then they extended that list out. By registering, I believe 6 7 they were fingerprinting and taking their photos. 8 One of the additional -- I wasn't allowed to work 9 NSEERS, so I don't know all the details. And do you know why you weren't allowed to work 10 Q. 11 NSEERS? A. I was told it was because I was Arab. 12 MS. BRAGA: Sorry. Let me get my objections 13 14 in. 15 THE WITNESS: Okay. MS. BRAGA: Objection (inaudible). 16 COURT REPORTER: I didn't hear the objection. 17 18 MS. BRAGA: Sorry. Foundation. 19 COURT REPORTER: Thank you. 20 Q. (By Ms. Whidbee) And when you were working in, I 21 think you said it was SF at the time, did you see that NSEERS had -- did it have any impact on immigration benefits 22 that you were working on, applications for immigration 23 24 benefits? 25 MS. BRAGA: Objection; foundation.



```
Page 47
 1
         A.
              I really don't know.
 2
             (By Ms. Whidbee) Okay. And based on your
         Q.
     knowledge of NSEERS, did you think it was productive or
 3
     helpful for USCIS?
 4
 5
                  MS. BRAGA: Objection; form, vaque, also
     foundation.
 6
 7
          A.
              Did I think it -- the question was: Did I think
 8
     it was productive?
9
          Q.
              (By Ms. Whidbee) Yes.
             I don't really know enough on the real reasons for
         A.
10
11
     it.
              Okay. I want to ask you a little bit more too
12
         Q.
13
     about -- you were talking about when you -- shortly after
     you first arrived in SF, and they had you go and looking at
14
     boxes; is that correct?
15
16
         A. Yeah.
              And could you tell me a little bit more about what
17
          Q.
     they told you you should be doing while you were doing that?
18
              It was a long time ago, so I don't remember. This
19
          A.
20
     would be 2002. I don't remember everything. They just said
21
     I would be looking for Arab names and pulling those
     documents out, and they were applications.
22
              Do you know what happened to an application after
23
          Q.
24
     you pulled it out for that reason?
25
         A.
              No, I --
```



```
Page 48
                  MS. BRAGA: Objection; foundation.
 1
              (By Ms. Whidbee) Were you supposed to give those
2
     applications to somebody?
3
              They were piled up.
4
         A.
5
         Q. Okay. And do you know what happened to them after
     they were piled up?
6
 7
                  MS. BRAGA: Objection; foundation.
8
              I don't know.
         A.
              (By Ms. Whidbee) Okay. You also mentioned that,
9
         Q.
     shortly before you left SF, you managed to arrange a
10
11
     training there. Could you tell me who did that training?
12
         A. Without looking up her name, I wouldn't be able
     to. Her first name was Myah or Mia. Maya, I think. And
13
     El Ghazi or -- E-L -- I can't remember. It's G-H or G-A
14
     something.
15
16
              And do you know what their background was?
         Q.
                  MS. BRAGA: Objection; foundation.
17
         A. I can't remember how I found her. I was connected
18
     to the Arab American, in a community down there, so I found
19
20
     her somehow through that. And she gave trainings to
21
     offices. That's kind of what she did.
              (By Ms. Whidbee) And what was the focus of the
22
         0.
     training that she gave in SF?
23
24
         A. It was like -- it was cultural sensitivity
25
     post-9/11, I believe. I think it was all -- and I want --
```



```
Page 49
              Do you remember --
 1
         Q.
              Oh. Go ahead.
              It's okay. Go ahead.
 3
         Α.
              Okay. Do you remember what some of the kind of
 4
         0.
 5
     key take-aways of that training were?
              I wish I did. I really don't.
 6
         A.
 7
                  MS. WHIDBEE: Bless you.
 8
                  MS. BRAGA: Thank you.
9
         Q.
              (By Ms. Whidbee) Did you think that the training
     made any difference in the office?
10
11
         A.
             I heard that it did, from officers.
         Q. What did you hear about it?
12
             I had heard that they were glad to get it and that
13
         A.
     they wished they got training like that for other areas.
14
         Q. What other areas would they -- did they say they
15
16
     would like to get training on?
              San Francisco -- San Francisco population is
17
     primarily, like, Asian caseload, so that's what they would
18
19
     want.
20
         Q. Okay. Did you get any negative feedback to the
21
     training at all?
             I don't remember that, no.
22
         A .
23
         Q.
             Okay.
               Okay. You mentioned earlier that you received a
24
     federal law enforcement training when you were -- I believe
25
```



- 1 you said it was when -- for one of your previous jobs; is
- 2 that correct?
- 3 A. Mm-hm.
- 4 Q. Have you received any law enforcement-related
- 5 training for your current position?
- A. No. That original law enforcement training covers
- 7 my current -- that first -- they now call it basic. Back
- 8 then, they called it something else. It's the same
- 9 training.
- 10 Q. Okay.
- 11 A. So they --
- 12 Q. (Inaudible.)
- 13 A. -- send me back for basic.
- 14 COURT REPORTER: Can you repeat that?
- 15 THE WITNESS: So they didn't send me -- so for
- 16 my current position, what I would have needed was basic
- 17 training, called basic. And what I had before is the
- 18 equivalent of basic, so they did not send me back for the
- 19 same training I already had.
- Q. (By Ms. Whidbee) And aside from trainings, can
- 21 you describe any experience in law enforcement
- 22 investigations you've had?
- 23 A. I mean, the five years doing marriage-fraud
- 24 interviews and working somewhat with ICE, somewhat, is some
- 25 experience.



```
Page 171
                        CERTIFICATE
 1
 2
 3
     STATE OF WASHINGTON
                           ) ss
 4
     COUNTY OF PIERCE
                           )
 5
 6
               I, the undersigned certified court reporter,
     hereby certify that the foregoing deposition of NADIA R.
 7
     DAUD was taken before me on OCTOBER 8, 2020, and
     thereafter transcribed under my direction; that the
     transcript of the deposition contains the full, true, and
 8
     complete testimony of said witness, including all questions,
     answers, objections, motions, and exceptions of counsel;
 9
               That the witness, before examination, was by me
10
     duly sworn to testify the truth, the whole truth, and
11
     nothing but the truth, and that the witness RESERVED the
     right of signature;
12
               That I am neither attorney for, nor a relative or
     employee of, any of the parties to the action; further, that
13
     I am not a relative or employee of any attorney or counsel
     employed by the parties hereto, nor financially interested
14
     in the said action or the outcome thereof;
15
               IN WITNESS WHEREOF, I have hereunto set my
     signature this 16th day of October, 2020.
16
17
18
19
20
21
                               KAREN M. GRANT
                               Certified Court Reporter No. 2155
22
                               (Certification expires 04/19/2021)
23
24
25
```



1 2		ERRATA		
3				
4 PAGI	1/22	E CHANGE FROM	CHANGE TO	REASON
5 2	2	zoom videoconference	WebEx	correction
6 9	3	I had my home computer. It didn't	I had, but my computer at home didn't	correction
7 13	20	Then I worked in our records	I worked in the records	correction
8 14	18	Security with USCIS	Security, USCIS	correction
9 14	24	an officer for	a Refugee officer for	word missing
10 14	25	Refugee officer interviews.	conducting refugee interviews around the world.	correction
11_15	4	I was the Middle	I was with the Middle	correction
12_15	8	on I'm still supervising.	on refugee circuit rides as an acting supervisor.	correction
13_18	9	vetting.	vetting, after we applied for each other's positions	correction
₁₄ 19	11	happened, Turkey	happened, as it did in Turkey	correction
₁₅ 21	14			correction
16 29	16	touch a CARRP case.	touch a CARRP case in Seattle.	correction
17 30	5	nondetermination	nondiscrimination	correction
18 34	6-7	and Istans	and applicants from various "-istan" countries	correction
19 38	15	as "Arab" instead	as "A-rab" instead	correction
20 53	10	been (inaudible) years.	been one year.	correction
21 56	1_			correction
22 61	19			correction
23 73	17	were on a CARRP team	were not on a CARRP team	correction
24 81	18	in other countries	in other offices	correction
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11/23/2020

1	ACKNOWLEDGMENT OF DEPONENT
2	
3	J J
4	The state of the s
5	answers given by me to the questions therein propounded, except for the
6	corrections or changes in form or substance, if any, noted in the attached
7	Errata Sheet.
8	WITNESS NAME DATE
9	WITNESS NAME DATE
10	
11	Subscribed and sworn to before me this
12	day of, 20
13	My commission expires:
14	
15	Notary Public
16	
17	
18	
19	
20	
21	
22	

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