

Exhibit 55

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

)	
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 TO PROTECTIVE ORDER **
VIDEOTAPED DEPOSITION
of
NADIA R. DAUD

OCTOBER 8, 2020

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File No. 641652

REPORTED REMOTELY BY: Karen M. Grant, WA CCR No. 2155



1 scheduling interviews. I really don't remember.

2 Q. Okay. And how long did you do that particular
3 aspect of the job?

4 A. It wasn't very long. I think it was around six
5 months. It wasn't very long. And then it -- then they
6 moved me up to be an officer, an interviewing officer.

7 Q. Okay. And how long were you an interviewing
8 officer?

9 A. In San Francisco, I was an interviewing officer
10 until -- until 2007, August 2007.

11 Q. Okay. And what were your responsibilities as an
12 interviewing officer?

13 A. I primarily did I-485 adjustments and primarily
14 marriage fraud.

15 Q. Okay. And what was your next job after that?

16 A. In August 2007, I moved to Washington, D.C., and
17 joined Refugee Affairs Division, also with Department of
18 Homeland Security with USCIS, and became a Refugee officer.

19 Q. Okay. And how long were you in that job?

20 A. I was with Refugee Affairs Division for ten --
21 just under ten years, but I had multiple positions within
22 Refugee Affairs.

23 Q. And what positions were those?

24 A. I was an officer for around a year so, just
25 Refugee officer interviews. And then I was a supervisor for

1 A. So . . .

2 Q. Okay.

3 A. I don't know how to answer that.

4 Q. That's fine.

5 Okay. So after that job, what was your next job
6 after, after that one?

7 A. I asked for -- my mom got sick, so I asked -- I
8 didn't want to leave Refugee Affairs Division. That's
9 actually a dream job. But I had to ask for a transfer to
10 Seattle USCIS.

11 Q. Okay. I'm sorry to hear that your mother wasn't
12 well.

13 And is that your current job?

14 A. Yeah. So I'm a senior immigration officer, an
15 ISO-III, in Seattle.

16 Q. Okay. And how long have you been in your current
17 position, then?

18 A. Since January 2017.

19 Q. And what are your responsibilities in your current
20 position?

21 A. They vary. Senior immigration officers tend to be
22 very different in different offices, and they're very
23 different in my office. I don't do the same thing as any of
24 the other senior officers. We all tend to do something
25 different.

1 VIDEOPHOTOGRAPHER: 5:34 p.m., we're back on the
2 record.

3

4 EXAMINATION

5 BY MS. BRAGA:

6 Q. Nadia, I wanted to follow up with you.

7 MS. BRAGA: Actually, can we put on the record
8 that Plaintiffs' counsel is done with questioning?

9 MS. WHIDBEE: Yes. That's all the questions I
10 have for now.

11 MS. BRAGA: Thank you.

12 Q. (By Ms. Braga) Nadia, I have some follow-up
13 questions on some things that you were asked about earlier.
14 Earlier today, you testified that when you were working in
15 the San Francisco field office, you were tasked with
16 reviewing files in a basement and, specifically, with
17 removing files from boxes when the files were for
18 individuals who had Arabic-sounding names. Do you recall
19 that testimony?

20 A. Yeah.

21 Q. During what time period did you perform that work?

22 A. It was soon after I started working there, so it
23 was 2002.

24 Q. And what years were you assigned to the
25 San Francisco field office?

1 A. 2002 to 2007.

2 Q. Okay. And since that time that you just mentioned
3 in 2002, have you ever been asked to treat immigrant
4 benefits applicants differently than other applicants based
5 on an applicant having an Arabic name?

6 A. No.

7 Q. You mentioned earlier today that an officer in the
8 Seattle field office [REDACTED] had said derogatory
9 things about Middle Eastern Africans. Do you remember that
10 testimony?

11 A. Yes.

12 Q. Does he work on CARRP cases?

13 A. No, he doesn't.

14 Q. Are you aware of any officers in the Seattle field
15 office who work on CARRP cases making derogatory comments
16 about individuals from the Middle East?

17 A. No, not at all.

18 Q. You also testified earlier today that, in response
19 to questions about law enforcement training, that you went
20 to something called basic?

21 A. Mm-hm.

22 Q. What did you mean when you referred to basic as
23 law enforcement training?

24 A. It was at the law enforcement training center in
25 Brunswick, Georgia.