

EXHIBIT 7



**U.S. Citizenship
and Immigration
Services**

July 21, 2015

APP2015001099

Seth Watkins
Adduci, Mastriani and Schaumberg
1133 Connecticut Avenue, NW
Washington, DC 20036

Dear Mr. Watkins:

Re: COW2014000817

You appealed the action of the National Records Center regarding your request for access to records pertaining to Operating Procedures for Administration of H-1B, dated December 04, 2014. The original determination of the National Records Center was to withhold 228 pages in part and 127 in full.

After careful consideration of your appeal, and as a result of discussions with the National Records Center, we have decided to release 218 additional pages to you, copies of which are enclosed. We are releasing 217 pages in part and 1 in full. We have redacted information pursuant to 5 U.S.C. §§ 552 (b)(4), (b)(5) and (b)(6).

On the remaining pages, we found that the National Records Center properly withheld certain information that is protected from disclosure. We have determined that this information is not appropriate for discretionary release.

In your appeal letter, you requested a Vaughn index; however, at this stage a Vaughn index is not given or required. *See Vaughn v. Rosen*, 484 F. 2d 820 (D.C. Cir. 1973). Your request that we itemize and justify each item of the information withheld is denied. You are not entitled to such a listing at the administrative stage of processing FOIA requests and appeals. *See Judicial Watch v. Clinton*, 880 F.Supp. 1,11 (D.C. Cir. 1995).

If you are dissatisfied with our action on your appeal, you may seek judicial review in accordance with 5 U.S.C. § 552(a)(4)(B). The Office of Government Information Services (OGIS) also mediates disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. The OGIS does not have the authority to handle requests made under the Privacy Act of 1974. If you wish to contact OGIS, you may email them at ogis@nara.gov or call 1-877-684-6448.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan D. Hughes".

Alan D. Hughes, Associate Counsel
Commercial and Administrative Law Division
Department of Homeland Security
Citizenship and Immigration Services