

EXHIBIT D

October 9, 2019

U.S. Citizenship and Immigration Services
National Records Center, FOIA/PA Office
P.O. Box 648010
Lee's Summit, MO 64064-8010
uscis.foia@uscis.dhs.gov

RE: Request under the Freedom of Information Act
Fee Waiver Requested

To Whom It May Concern:

This letter constitutes a request for records pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 (2012).

I am conducting an academic study on citizenship that examines the determinants of naturalization petition outcomes. In connection with this study, **I request anonymized, individual-level data on every person who filed an application for naturalization with the U.S. Citizenship and Immigration Services ("USCIS") between August 1, 2018 and the present.** Individual-level data means that each row in the dataset pertains to an individual who filed an application for naturalization ("applicant"), and each column in the dataset pertains to a field containing information about the individual. Please note that I am not seeking any individually-identifying information that will compromise individual applicants' privacy.

To facilitate USCIS's search for records and the utility of the information provided, I request that electronic copies of the data be provided to me pursuant to 5 U.S.C. § 552 (a)(3)(C), either as a series of csv files or other machine readable data format. I also request current translation files for any fields containing coded entries (e.g., data dictionary), and detailed notes on the database query and limitations of the data, including explanations of any changes to the way any given field might have been coded over time.

For each applicant, I request the following information the applicant submitted to the USCIS on his or her Form N-400, Application for Naturalization. Specifically, I request information submitted under the following required categories on Form N-400:

1. Information about the applicant's eligibility for naturalization (e.g., lawful permanent resident for at least 5 years, etc.).
2. Information about the applicant (e.g., country of birth, gender, etc.).
3. Accommodations for individuals with disability and/or impairments (whether applicant is requesting accommodation due to disabilities, etc.).



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4. Information about the applicant's place of residence (excluding street address but *including city or town, county, state, etc.*).
5. Information about the applicant's parents (e.g., country of birth, etc.).
6. Biographic information about the applicant (e.g., race, ethnicity, etc.).
7. Information about the applicant's employment and schools attended (dates of employment, occupation, etc.).
8. Time the applicant spent outside the United States (e.g., total days outside the United States, etc.).
9. Information about the applicant's marital history (e.g., current marital status, etc.).
10. Information about the applicant's children (e.g., total number of children, etc.).
11. Additional information about the applicant (e.g., whether the applicant ever claimed to be a U.S. citizen, ever registered to vote, owe taxes, have criminal conviction, etc.)

In addition, I request the following records pertaining to the USCIS' decision on each person's naturalization application:

1. USCIS' decision on the applicant's naturalization application (e.g., denied, granted, etc.)
2. The date of the USCIS' decision on the applicant's naturalization application.
3. For each application denied, the basis or the reason(s) for the denial decision.

Finally, I request **an anonymized ID** to identify the individual both within a single table and across separate tables or outputs if the data is provided in separate tables. To allow for identification of the same individual over time, individuals with records across multiple fiscal years should be assigned unique IDs that stay the same across separate tables associated with different fiscal years. An anonymized ID refers to a random subject ID that the Department of Homeland Security has routinely included in its prior record productions to other requesters unrelated to this Request (see, for example, "Unique Subject ID" variable in a series of files titled "Total Individuals Detained by ICE FY15 through August," under the tab "Detention Facility Statistics," available at <https://www.ice.gov/foia/library>).

* * *

I request a waiver or a reduction in fees pursuant to 5 U.S.C. § 552(a)(4)(ii)(II) (2012) ("fees shall be limited to reasonable standard charges for document duplication when records are not sought for commercial use and the request is made by...educational or noncommercial scientific institution") and 6 C.F.R. § 5.11(d)(1) (search fees shall not be charged to "educational institutions"). I am an academic researcher at the University of Southern California, which qualifies as an "educational institution" within the meaning of FOIA, 6 C.F.R. § 5.11(b)(4) (2012) (defining "educational institution" as "an institution of undergraduate higher education [or] an institution of graduate higher education...that operates a program of scholarly research.").

Furthermore, the information requested is not sought for a commercial purpose. I seek the information for my scholarly research on the U.S. immigration system. A primary goal of my scholarly research is to advance public understanding of policy-relevant social scientific knowledge. A

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summary of my scholarship can be found here:
<http://weblaw.usc.edu/contact/contactInfo.cfm?detailID=71271>.


I look forward to your reply to the records requested within twenty (20) business days as required under FOIA, 5 U.S.C. § 552(a)(6)(A)(i) (2012). I also request that you provide an estimated date by which you will complete the processing of this request, 5 U.S.C. §552(a)(7)(B). See Muttitt v. U.S. Cent. Command, 813 F. Supp. 2d 221 (2011).

Please furnish the information requested to me by email at eryo@law.usc.edu or by mail:

Emily Ryo
Professor of Law & Sociology
USC Gould School of Law
699 Exposition Blvd.
Los Angeles, CA 90089-0071

If you have any questions, please contact me at 650-248-3855 or via e-mail at eryo@law.usc.edu. Thank you in advance for your timely consideration of this request.

Sincerely,



Emily Ryo, JD, PhD
Professor of Law & Sociology
USC Gould School of Law