

EXHIBIT 1

~~FILED UNDER SEAL~~

~~ATTORNEYS' EYES ONLY~~

Renaud, Daniel

January 10, 2020

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIQAFAR WAGAFE, et al., on	:	
behalf of themselves and others	:	Case No.:
Similarly situated,	:	17-CV-00094 RAJ
Plaintiffs,	:	
VS.	:	
DONALD TRUMP, President of the	:	
United States, et al.,	:	
Defendants.	:	ATTORNEYS' EYES ONLY

Washington, DC

Friday, January 10, 2020

Videotaped Deposition of DANIEL RENAUD
held at Perkins Coie, 700 13th Street, NW, Suite 600,
Washington, DC 20005, commencing at 9:36 a.m., before
Sherry L. Brooks, Certified LiveNote Reporter and
Notary Public, in and for the District of Columbia.

~~ATTORNEYS' EYES ONLY~~

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1 delayed. There's a difference between delay and
2 taking longer to process.

3 If you -- if you order a slice of cake in 19:25
4 a restaurant, it comes right out. If you order a
5 souffle, it's going to take longer. If you're saying
6 the souffle is being delayed, then I would -- I don't
7 think it's being delayed. I think it just takes
8 longer to process or to bake a souffle.

9 It takes longer to process a case that has 19:25
10 additional complexities and questions to it, so I
11 don't -- I don't see that as a delay, at least not
12 from my perspective.

13 Q. Well, before you can bake the souffle, 19:26
14 you've got to crack the eggs and whip them, right?

15 A. I'm not a pastry chef, but sure. 19:26

16 Q. Before you bake the cake, you have to 19:26
17 create the batter, right?

18 A. We're going to torture this analogy, but 19:26
19 yes.

20 Q. All right. So delays can happen. It's 19:26
21 not a matter of getting it from the oven to the
22 table. It's a matter of people paying attention and

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1 doing their job, right?

2 A. Sure. The steps in the process need to be 19:26
3 done and they need to be done in a timely manner.

4 Q. Have you evaluated whether the CARRP 19:26
5 policy creates incentives for your officers to delay
6 making decisions on applications?

7 A. I think the CARRP process, as I think I 19:26
8 mentioned earlier, does just the opposite. The CARRP
9 process defines those steps. It defines how you go
10 from one step to another, and it gets a case to a
11 final decision faster than we were doing before --
12 than was happening before the CARRP process.

13 Q. That's your belief. Have you evaluated, 19:27
14 in fact, whether your belief is justified?

15 A. I think the data proves it out. I think 19:27
16 that if you look at the CARRP process that has been
17 used over the last two years, we've completed about
18 -- I think it's about 6,000 cases in the last two
19 years, which is more cases than in the history of
20 CARRP through that process, certainly more than
21 before CARRP.

22 Those cases were simply not moving. That 19:27

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1 was the state of our processing of national security
2 cases prior to CARRP.

3 We had some fits and starts. We had some 19:27
4 delays. I will admit that because of -- anytime you
5 have a new process, there is -- there's hesitation.
6 There's course correction. There is the
7 straightening out of -- of guidance and providing
8 clarity.

9 But if you -- you asked me the question of 19:28
10 if CARRP were discontinued today, or whatever the
11 question was, would there be harm.

12 We have a process in place now where over 19:28
13 the last two years because of CARRP, because of the
14 way that we're managing the CARRP process, we
15 completed more cases that had been identified as
16 national security concerns in a two-year period than
17 we have in the history of this agency.

18 To take that away at this point would, in 19:28
19 my estimation, certainly cause displace (sic) -- the
20 process works to get cases to final decision.

21 Q. Let me ask you one last subject. The 19:28
22 6,000 or so cases that you say have been processed

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