

# EXHIBIT E

~~FILED UNDER SEAL~~

~~CONFIDENTIAL~~

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

-----x

ABDIQAFAR WAGAFE, et al., on :  
behalf of themselves and :  
others similarly situated, :  
Plaintiffs, :

-vs- : No.

DONALD TRUMP, President of the: 17-cv-00094 RAJ  
United States, et al., :  
Defendants. :

-----x

CONFIDENTIAL UNDER THE PROTECTIVE ORDER

30 (B) (6) VIDEOTAPED DEPOSITION OF USCIS

BY AND THROUGH KEVIN QUINN

Thursday, September 3, 2020

10:09 a.m.

Job No.: 623013

Pages 1 - 312

Reported by: Tammy S. Newton

~~CONFIDENTIAL~~

1

2

Confidential videotaped deposition

3

of KEVIN QUINN taken by Counsel for Plaintiffs,

4

held remotely before Tammy S. Newton, Notary

5

Public, beginning at approximately 10:09 a.m.

6

EST, when were present on behalf of the

7

respective parties:

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

~~CONFIDENTIAL~~

Page 3

1 A P P E A R A N C E S

2 ON BEHALF OF PLAINTIFFS:

3 JENNIFER PASQUARELLA, ESQUIRE

4 ACLU Foundation of Southern California

5 1313 W. 8th Street

6 Los Angeles, California 90017

7 (213) 977-5236

8 jpasquarella@aclusocal.org

9 and

10 PAIGE L. WHIDBEE, ESQUIRE

11 NICHOLAS GELLERT, ESQUIRE

12 Perkins Coie LLP

13 1201 Third Avenue, Suite 4900

14 Seattle, Washington 98101-3099

15 (206) 359-3629

16 pwhidbee@perkinscoie.com

17 ngellert@perkinscoie.com

18

19

20

21

22

~~CONFIDENTIAL~~

Page 4

1           A P P E A R A N C E S (Continued):

2           ON BEHALF OF THE DEFENDANTS:

3           BRIAN C. KIPNIS, ESQUIRE

4           U.S. Attorney's Office (SEA)

5           700 Stewart Street, Suite 5220

6           Seattle, Washington 98101-1271

7           (206) 553-7970

8           brian.kipnis@usdoj.gov

9           and

10          ANDREW BRINKMAN, ESQUIRE

11          U.S. Department of Justice

12          450 5th Street, N.W.

13          Washington, D.C. 20530

14          (202) 305-7035

15          andrew.brinkman@usdoj.gov

16

17

18

19

20

21

22

~~CONFIDENTIAL~~

Page 5

1           A P P E A R A N C E S (Continued):

2           ON BEHALF OF DEFENDANTS:

3           CAITLIN MILLER, ESQUIRE

4           JESSICA SCHAU NELSON, ESQUIRE

5           KAITLYN CHARETTE, ESQUIRE

6           U.S. Citizenship & Immigration Services

7           U.S. Department of Homeland Security

8           111 Massachusetts Avenue, N.W.

9           Suite 3100

10          Washington, D.C. 20529-2121

11          (202) 272-1107

12          caitlin.e.miller@uscis.dhs.gov

13          jessica.r.schaunelson@uscis.dhs.gov

14          kaitlin.charette@usdoj.gov

15

16          ALSO PRESENT:

17          DAN KATZ, Videotape Operator

18

19

20

21

22

~~CONFIDENTIAL~~

1	C O N T E N T S	
2	EXAMINATION OF KEVIN QUINN	PAGE:
3	By Ms. Pasquarella	8
4	By Mr. Kipnis	307
5		
6	DEPOSITION EXHIBITS	PAGE:
7	Number 1 - Notice of Deposition	9
8	Number 2 - Certified Administrative	
9	Record	17
10	Number 3 - Training Module 4	166
11	Number 4 - Interoffice Memo	218
12	Number 5 - Training Module 4	221

13  
14  
15  
16  
17  
18  
19  
20  
21  
22

(All exhibits attached to transcript.)

~~CONFIDENTIAL~~

Page 7

1 P R O C E E D I N G S

2 VIDEOTAPE OPERATOR: We are now on the  
3 record. This begins Video 1 in the deposition of  
4 Kevin Quinn in the matter of Abdiqafar Wagafe, et  
5 al. versus Donald Trump, President of the United  
6 States, et al. in the United States District  
7 Court, Western Division of Washington at Seattle.

8 Today's date is Thursday, September  
9 3rd, 2020. The time is 10:09 a.m. This  
10 deposition is being taken remotely at the request  
11 of Perkins Coie LLP. The videographer's name is  
12 Dan Katz, and the court reporter is Tammy Newton,  
13 both from Magna Legal Services. All counsel and  
14 parties present will be noted on the stenographic  
15 record. Will the court reporter please swear in  
16 the witness.

17 COURT REPORTER: Does everyone  
18 stipulate to the following: No party to the  
19 litigation will object to the remote deposition  
20 on the grounds that the stenographer may not have  
21 the legal authority to swear in the witness.

22 MS. PASQUARELLA: Plaintiffs agree.



~~CONFIDENTIAL~~

Page 8

1 MR. KIPNIS: So stipulate.

2 KEVIN QUINN,

3 after having been duly sworn remotely by the

4 stenographer, was examined and testified as

5 follows:

6 EXAMINATION BY COUNSEL FOR THE PLAINTIFF

7 BY MS. PASQUARELLA:

8 Q Good morning, Mr. Quinn.

9 A Good morning.

10 Q Can you please state your name and

11 spell it for the record.

12 A Sure. My name is Kevin Quinn. Last

13 name spelled Q-U-I-N-N. First name K-E-V-I-N.

14 Q And tell us your title.

15 A I am division chief for USCIS Fraud

16 Detection and National Security, National

17 Security and Public Safety Division.

18 Q How long have you been division chief?

19 A I have been a division chief for a

20 little over four years. I've been with the

21 National Security and Public Safety Division for

22 a little over a year.

~~CONFIDENTIAL~~

Page 31

1 BY MS. PASQUARELLA:

2 Q So do you know why the agency decided  
3 that it was important to launch the CARRP policy?

4 A We wanted to ensure that we had a  
5 consistent approach for identifying potential  
6 national security concerns for reviewing those  
7 cases, for documenting and working those cases  
8 and for getting those cases to and through  
9 adjudication.

10 Q And was there something inconsistent  
11 about the way national security cases were  
12 handled prior to CARRP?

13 MR. KIPNIS: Objection; scope. You  
14 can answer in your personal capacity.

15 THE WITNESS: Prior to CARRP, those  
16 cases were, as I said, handled at headquarters,  
17 and part of CARRP was returning responsibility of  
18 those cases back to the field offices.

19 BY MS. PASQUARELLA:

20 Q And why did they want to do that?

21 MR. KIPNIS: Objection. Go ahead and  
22 answer.

~~CONFIDENTIAL~~

Page 310

1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, Tammy S. Newton, the officer before  
3 whom the foregoing proceedings was taken, do  
4 hereby certify that the foregoing transcript is a  
5 true and correct record of the proceedings; that  
6 said proceedings were taken by me  
7 stenographically and thereafter reduced to  
8 typewriting under my supervision; and that I am  
9 neither counsel for, related to, nor employed by  
10 any of the parties to this case and have no  
11 interest, financial or otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set  
13 my hand and affixed my notarial seal this 15th  
14 day of September, 2020.

15 My commission expires:

16 3/05/2022

17

18

\_\_\_\_\_

19

Notary Public in and for the

20

State of Maryland

21

22