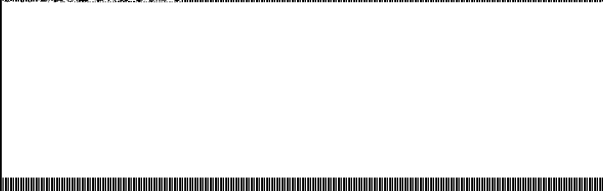


COVINGTON

BEIJING BRUSSELS DUBAI FRANKFURT JOHANNESBURG

Covington & Burling LLP
One CityCenter
850 Tenth Street, NW

Washington, DC 20001-4056



ROYAL EXHIBIT

Office of the General Counsel

Attorney General

Washington, DC 20530-0004

Mail Stop 0485

Washington, DC 20525-0485

Office of the Chief Counsel

Immigration and Customs Enforcement

Inspection Office

Services

ues. or as CIOU. Create
Log in to your account
able share on telegram
page

cerely,

Sinc

Mr. [redacted] [redacted]
[redacted]
[redacted]

Jason A. Carey
Bridney Theoti
Diane Ramirez
Clavinton & Bunting JAC
Washington, DC 20001
(202) 662-6000
M.Fid. [redacted]

J.Carey@dcyf.com

Michelle Lapointe
Southern Poverty Law Center
P.O. Box 1287
Daphne, GA 30081-1287
(404) 521-6700
Michelle.Lapointe@splcenter.org

[redacted]

Authorization Form, Birth Certificate, SR-95 Forms, SR-95 Affidavit, ...

Enclosures, Claim A

[redacted]

[redacted]

\$ 77 \$ H4] 2 I I L F R P R I O W D Q G * H H F X U D W \ & R X Q V H
0 X U U D \ / D Q H 6 :
0 D L O 6 W R S
: D V K L Q J W R Q ' &

2 I I L F H R I W K H 3 U L Q F L S D O 8 / 6 J D X \$ G R E V R D Q G % R U G H U 3 U R W H F W L
, P P L J U D W L R Q D Q G & X V W R P M L (F H R R U F W R H O W K L H I & R X Q V H O
W K 6 W U H H W 6 : 3 H Q Q V \ O Y D Q L D \$ Y H Q X H 1 :
: D V K L Q J W R Q ' & : D V K L Q J W R Q ' &

8 6 ' H S D U W P H Q W R I + H D O 8 W K D X G W X P D D Q G % R U G H U 3 U R W H F W L
6 H U Y L F H V 7 X F V R Q) L H O G 2 I I L F H
2 I I L F H R I W K H * H Q H U D O & R X Q V H D U D F O H 5 R D G
, Q G H S H Q G H Q F H \$ Y H Q X H X 6 W H
: D V K L Q J W R Q ' & 7 X F V R Q \$ =

& O D L P D Q W \ V 3 H U V R Q D O 5 H S U H V H Q W D W L Y H

& R X Q V H O 0 D W W K H Z 6 F K O H V L Q J H U & R Y Q V J W R Q 7 1 X Q U O K G
E O \ V H S D U D W H G E \ H D F J X I Q L W M R 3 ' + 6 K H V 8 H C H U B S P D H U D W G Z W D
\$ 3 & Z D V S X W G L R W R W K H B 6 X V H S R D O W P K H D Q G R + X P D
3 + + 6 ' 2 I I L F H I R U W 5 W O H P H H Q 3 W H V 1 2 5 5 ' U H 2 D L O H G 1 3 Q 0 ' + 6
+ 3 0 D Q G \$ 3 & Z H U H Q R W U H X Q L W H G X Q W L O \$ X J X V
7 L P H \$ 0 R U 3 0

+ 3 0 G R H V Q R W N O O R G Z K L K H V B X J K M C H U Q Z W U K H I V H R S D U L D W H R
H Y H Q L Q J + 3 0 D Q G H K L H O G D I X Q K D W H O C R Z L W R K V Q R H Z R X W G R R U
O L J K W V Z H U H D O Z D \ O R N H S W W U R D F N W R K L W L P H O D K L O H L Q

\$WWDFKPHQW \$ WR 6WDQGDUG)RUP
&ODLPDQW + 3 0 RQ EHKDOI RI \$LBV&HOI DQG KLV PLQRU C

%DVLV RI &ODLPV

\$ 7KH *RYHUQPHQW)RUMFHGOA 8HDS IURP \$ 3 &

%HWZH HQ PLG DQG ODWH WKHL BQL WWRG N6 WDKR N V
RI FKLOGUHQ IURPHVGHQU S/DKHPQWWMIB ELORLFWLH K XCCGU H G V I
DZD\ 7KHVH IDPLOL SVHURVWFIXWLRG XODWUK HMURIQFOR HWIR HQFR
WKH YHU\ SODFX JMKH\$WIRX JEKWL QJH H SDDQD WWHGL L B KSLDUGH QWV
XQDEOH WR FRPPXQLF DWR Q WRV Z3HDUNB QMW KGHUG WQRHL UN QRZO G
VDIH²RU HYHQ ZKHUHQ ZWKUHL U& K K O G W V W F Q & OZK QWR VK DQ B B S S
WKHP 7KH JRYHUQPHQW WRUH DSDG \$ D D P Q QLVH W RVXRE QW R W
DQJXLVK DQG WRUPHQW

7KH JRYHUQPHQW XQV KIDW VLRV B DWKHEI KODUFRALQJVR QWWW R
FKLOGUHQ \$ D R P Q W K V M Q R W I L V K N E S A S E U R P L E V W L Q W H Q G L Q J W K D W
LQIOLFHWG RQ WKHWHUI B P L K C L U H V D P R X O L Q G W U R R W R H J 8 Q L W H G C

+ 3 0 DQG KLV W&HGD XJK WHDU \$ R G H I D P U B L D P R Z K R W Z H U H
DSDUW E\ WKH 8 63 DR YHQGQ \$ BQ&V V X O I H B H G W S D K O V L D F Q G H P R W I
EHFDXVH RI D PXOWLWXGH RI XQFR QD V Q L W X I W O B Q H D W L D F W H V C
E\ D UDQJH RI 8 6 JRYHUQPHQW D K W R K L V K M R W H O R I Y Z I O R P R R S
JRYHUQPHQW ZKR WHH J R D U P Z D Q V G V L R U F W R K O O \$ I F R Q J D R Q K M U W K
IHGHUDO DFWRUV X I O N R I Q V E D U L C H I S D P P D M L V G G + D X J K W H U H P S
H [F H V V L Y H I R U F K H D Q G R E Q X H O R W D Z G H I M K B H E G W L F H F [H U H F I D Q G C
DUH KDOOPDUNV RI D FLYLOLJHG VRFLHW\

+ 3 0 DQG \$ 3 & ZLXPD RDUBU FLKED MWKDS V B H B W B B QWKH U
WKHLU OLYHV 7RHP\ W K H N U R Y H G U Q P H V Q K H I R R Y W K B P K H Q W P K D V F
WKHP

+ 3 0 DQG \$ 3 & \$ Q L W H G I 6 Q D W K H I V B D Q % 3 D U H 7 D M
& X V W R G \

+ 3 0 DQG \$ 3 & UHDFKHG \$UL]RQDYRQJR UOBIGRXLRG B D F
WKHLU KRPHWRZ Q I L L W W K H I O B O D O P R I O G L B D W O P D O W H U W K H
WKH 8 6 ERUGHU R L Q V R U \$ J L M R Q D D J K H P W 7 K S S B R I D F K H G D V N H C
L I K H Z D V * X D W H P S R D Q G H G 3 H V D I Q S F W K I G R I L E F D Q G G \$ 3 & W F
WKH %RUGHU 3DWURO YHKLFOH ZLWXKQRWKR XVPD QGDQVNH G Z
ZHUH JRLQJ + 3 0 H B M O X G U K I G U K E H O Q W K I D O R L Z J W R E H D O O U L J
GLG QRW NQRZ ZKHUH WKH RIILFHU ZDV WDNLQJ WKHP

7KH %RUGHU 3DWURO DDGQ\$ G U R Y S R U B [D R D F W W O R Q L D W H
PLQXWHV DZD\ ZKLFRH M M H L R H G S R L R Q F D W B R O H D % I R O V M U E B R X J K
WRJHWKHU EHIRUPHWRU D X W I S I G H W V B O V R V O K S E R O M H U V 7 K H % R U
DJHQW WROG + 3 0 W D R X V \$ R 3 W K W R R H K L F O H P I D J O G Q M R V Q Z K R Z H
7KH DJHQW DVNHG Z D V O K I L V \$ B X J K H G H B K L O B Q + X Q O H O B W S R Q
\$ 3 & ZDV KLV G D X H K W D H G U \$ D Q G W M B W H U W K H F B U M Q W L F W K H Q V W

\$WWDFKPHQW \$ WR 6WDQGDUG)RUP
&ODLPDQW + 3 0 RQ EHKDOI RI \$LBV&HOI DQG KLV PLQRU C

SDUHQWV FRXOG RRVOR BQLWFGROWDQVWZLWKD WKWGB\ ZRX
VHSDUDWHG 7KHXRIFDQHWXDLHGFKWEDGHOHQHDVDVLFNRUHWV + 3
XQGHUVWDQG ZKDWVQK HV BHHQJM PNBQQLX LQKWH S UH \$ DGB D WL

2QFH WKH DJHQW PROHGWREUWIRQGLHOMVGDHVSDELBQRW N
ZKDW WKH RIILFHUUPKH DQWROG ZKHVHS DDDVLRGVURVPK\$U RIIL
DSSURDFKHG + 3 0 HSDGD \$ B G&W B G WDWK LTX HRXVL B Q X J KWHU"
UHSHDWHGO\ VDLGRINHLVHBRPDV RHOVKB B ZDVZKH3WOKHV GDXJKW
VKH DOVR UHVSRRQGHG WKDW + 3 0 ZDV KHU IDWKHU

\$ IHZ PLQXWHV ODWIRID DJ%RWGHLU\$ B B W HGR+ JH W IDQGR D
ZLWK RWKHU LQGLGLG XDFOW H7 B B DUEH QW/OJH \$IKWHUZNRPH WI
+ 3 0 DQG \$ 3 & DUULYHG DW DQRW KXUGEB F DWR RQW Z KELHF K
FHQWHU + 3 0 ZDQ DPHYRU WRLO/GGMVGH QW X DQ X FUIH DZWKH\ LW
ZDV ORFDWHG 7KH\ ZHUH HVFRUWHG WLQMPR VDREXHEB Y B JWZK
JDUPHQWV EHOWV EDFNSDFNV DQG B VKRHOQD \$ HBV& 7 R B DJH
DOXPLQXP EODQNHW HDFK DQG HVFRSUSURGLW B WPH OMR DROWK
DQG FKLOGUHQ ZHUH DEHG QJ 3K B O G W HUSRFG DQGV B HDKOL]HG W
H[WUHPHO\ FROG ' ORLNHL DQER[' + 8 0 ERDQZSR B H RQO\ VOHH
VKLUWV VLQFH WKHLU RXWHU JDUPHQWV KDG EHHQ WDNHQ

\$W ILUVW + 3 0 Q B H V R G S 3 K B U D W K H \ + Z R X O G L O G H Q R M V Z R Q Q
\$ 3 & WR SDQLF R K H B B K F D U E H X W + H Q p € P p 0 _ H H Y H O H V V D
CDQGKLQRZLQJ
LQò° € € 0 ç...VQÀ° p à € ` 0 p € p U` p ¶ S Z K H 2 U F K W @ 4 Å ° + p 0 W K W € P . 8 Å Q K H

\$WWDFKPHQW \$ WR 6WDQGDUG)RUP
&ODLPDQW + 3 0 RQ EHKDOI RI \$LBV&HOI DQG KLV PLQRU C
+H IHOW GHVSHU D WEIXWRGK B OCSR\$ NQ RKZ ZFRXW G V B R G Z D \$ KRC
FORVHO\

7KH 8 6 *RYHUQPHQW 7DNHV \$ 3 & IURP + 3 0

6RRQ DIWHU + 3 CHUDHQGLSV3W&S072 FHG 10Q EHKHDQ WR VHH
RIILFHUV VHS DUDWLV Q H UPR WKRFU WRDQLU WFKH OJGDWVQ V B Q HO LC
+H VDZ RIILFHUV SK\VLFD00\ SXO B Q Q W FKQ G G UH D Q J D Z D \ W K R I
KDOOZD\ ZKLOH S D W X O H I A G R W R W V K H Q HOVHZKHUH \$ 3 & F
VHS DUDWLRQV R F H e t a U L Q Z H R Q V V L G H W K H

'XULQJ ZKDW + 3 0 Y E H E C H L H Q H W K M R I K H D Q G G J D R I L Q K G H L W H V W
RIILFHU RSHQH G i e W k H D C C F U D O V R H V K H 3 0 W R K L P 7 K H R I I L F H
D Q G F O R W K H V D Q \$ 3 W R O G K D F W K R R K H Y R H I G F H 3 D O W R F R Q I L U
\$ 3 & ¶ V Q D P H D Q G 3 G D W I I H C R W G L H V W K H Q D W Q W K H \ Z R X O G I L Q D O
U H O H D V H G : K L O H K H 3 E D W K R I G L \$ 3 G U W K Z H V N K H Q B D W D G 6 K H F
E D U H O \ V W D Q G X S

\$V + 3 0 H[LWRB PWZLHWKDS\$X& KH IV B Z UDV JZDLXVSL Q U R R U
7KH RIILFHUV LQ R W P R X Y F W W G R 3 H O D M C H Q B I L V K M W K D F O D I Z G \$ 3
WKH RSSRVLWH V L G U H H Z L W K 3 R O W K L P U W F G L D V H L O Q J R E W X W W K L V
G D X J K W H U ' 2 Q H B G W K 3 O R I W L K B W V M X B \ & D 7 K M R R I W L D F N I U V D L G
RIILFHUV ZR X O G U W D D Q G H V C H U B Q R G K H N O W Z R H X O I G H E H O E D V F H U 7 K H
H[SODLQHG WKDW WKH FKLOGUH Q G Z H W Q I E E R Q W W D N H Q Q V R R E
+ 3 0 W R O G \$ 3 & W K R H U R F Z I L W G U W H Q O D R O G H M / K D W M K R R Z O R + H G I
W R P D N H W K H P R R H U Q \$ V 3 D Q \ K D Q G G K H E Z R X G E G H V G H W K D W V R R Q
RIILFHU K D G H[S O D L Q H G W H R G U X \$ Q 3 F O R W W H D Q W R I I L F 3 H Q S E X V K L V D U F
K H U D Q G S X V K H G K H I Z U K E H D F W H \$ I 3 W B H W K O F O U R R O J D D Q G G V F U H D I
+ 3 0 I H O W G H Y G D Q W V W N Q R Z X Z M D G W K W R R G B F W B V S U H R Y H Q V N M Q J
\$ I W H U W K D W W B H O R D I Z L F H U Q D H C R G H 0 K I Q W D G L W H F K L I Q J + 3 0
E H L Q J O H G D Z D \ Z D O R S B & U R L Q Q V W K + K 3 W 0 W B D D H i e t a R X O D Q W H

\$WWDFKPHQW \$ WR 6WDQGDUG)RUP
&ODLPDQW + 3 0 RQ EHKDOI RI \$LBV&HOI DQG KLV PLQRU C

\$ GD\ RU WZR ODWHUWR+ BVOVZU MOVOC ZLLGD +LV VLVWH
WROG + 3 0 WKD V D KFD Q DG URFF HILYRIFQ D Q FZR UNK-DUWV\$ 3 & Z
OLFKLJDQ + 3 0 XQHG N B F WDR Q Z RVKNDHW WWRVHG L Q O DTZ WKDW
DUULYHG LQ WKHF B Q P S D I G L G D W H V Q Q R O V H N Q R Z O Z K G L U H O L F K L
RU ZK\ VRFLDO ZRUVNHU V Q V Q D Z G W K K D V O B \$ Q H & E W U K L Y H H O W L P
KHDULQJ WKDW \$ D V & N Q R Z C R D Q G L V B D W V K H Z D V Q R W O

+ 3 0 LV)LQW B O S \$ H D O H Z L W K \$ 3 &

2Q RU DURXQG OD\ DQ RIILFGIUDWYRHRKLP D OSKVR R H
QXPEHU :KHQ + 3 Q X B E B O H G H W K S R N H R Z L Q W H K Q D V Z I R P H G Q K Z H U V H C
\$ \$ D VRFLDO ZRUNHU + 3 0 D V N B G O Z D \$ G K H V K H D L N G Q H F Z V Z
\$ 3 & ZDV ZLWKS X H U \$ O 3 V & \$ R Q W K H V B / K W Q R D S Q V H D U K D O P R Z H H
VHSDUDWHG + 3 H E S S J A I G E O S P R Z A W W K E S K A S C A P O E B O D A @ W B A P O H Q J
DW WRO@HWCD0 &•p AH KO V` È@ Àp /

HQLQ B BKQI@ VOR OZJ W@ P\$ €DVRCR @WLKDW WK p H N Q D K U À Y \$ \$ I O À D P O À

\$WWDFKPHQW \$ WR 6WDQGDUG)RUP
&ODLPDQW + 3 0 RQ EHKDOI RI \$B&HOI DQG KLV PLQRU C

\$WWDFKPHQW \$ WR 6WDQGDUG)RUP
&ODLPDQW + 3 0 RQ EHKDOI RI \$LBV&HOI DQG KLV PLQRU C

2Q -XO\ \$ 3 & GZ DAR V D Q B W K O N U W R D W H Z D V D P R U H
H[SHULHQFHG LQ 3WUDXPD LQIRUPH G V H D G J R R O F W H Q D R B D S V B
ZHOO EHLQJ DQG QHM G D E R O E H H Q Q L D H R P O L Q H G Z L S V & W K H Q H Z
IDPLO\ XQWLO KHU UHWXUQ WR *XDWHPDOD

\$IWHU \$SSUR[LDPDWHSDUDWDWRQRJ)DWB&HH DQG 'D
5HXQLWHG

6LQFH EHLQJ GHSRUW V H S U H V 3 / H G I D Q C J D Q H W R X X Q H G U K R P H
ZLWKRXW KLV GDXR K V H M S H S J D W Z D V K R O S H D & Q T P R U H W X E R 0 V
LQLWLDOO\ WROZGR K E G Q R D W E \$ D B O I H P L R U H R W X D S S W R [K P D W I

2Q RU DURXQG \$XJXVWDWLRQ D Q G L J P M U R Q W R H G \$ W 3 K & P V
YROXQWDU\ GHSDUV W W H W Y \$ H Z & Z L K D G V D R C E L * X O D W H P D O Z H H N O D
ZDV LVVXH G WUDYH O G R O W D I F O W G R O S \$ X J X V S D U H Q Q G V L Q I R U P
WKHP WKDW \$ 3 & ZDV VFKHG XOH

\$WWDFKPHQW \$ WR 6WDQGDUG)RUP
&ODLPDQW + 3 0 RQ EHKDOI RI \$B V&HOI DQG KLV PLQRU C
,Q WKH QDPH RI GHUHQPHQW EG WKHUPRMDW WOF KW B G H H
WKHLU SDUHQWQ WKQ W V V Q G V F R U H G L W R V L Q Q W P D S D X A K L O G U

\$WWDFKPHQW \$ WR 6WDQGDUG)RUP
&ODLPDQW + 3 0 RQ EHKDOI RI \$LBV&HOI DQG KLV PLQRU C

€ ,Q WKH '+6 \$GYLVRU\ &RPPLWWHUVRFRQDPLXGHSG
WKDW ³WKH VHSDUDWLRQ RI IDPLQDUFVHPHQW \$XUSRVV
PDQDJHPHQW RYHGLQWQWLERQWVLQWHUHV RI FKL

€ ,Q)HEUXDU\ KDYLQJ QRWLFHGUDH QDUHSHDGDVW/G
IURP SDUHQWV DWK WQNLROJGHHG RYHGLQWQWLERQWVLQWHUHV
DERXW WKH KDUPV RI IDPLO\ VHSDUD

\$WWDFKPHQW \$ WR 6WDQGDUG)RUP
&ODLPDQW + 3 0 RQ EHKDOI RI \$B&HOI DQG KLV PLQRU C
\$GPLQLVWUDWLRQ W & M Z B O O V D Z D P L O R G H S D X V D W L R Q I Z B H L W
VHSDUDWLQJ IDPLOLHV LQ PLG

.QRZLQJ WKH +DUP WKH *RYHUQPHQW

\$WWDFKPHQW \$ WR 6WDQGDUG)RUP

\$WWDFKPHQW \$ WR 6WDQGDUG)RUP
&ODLPDQW + 3 0 RQ EHKDOI RI \$LBV&HOI DQG KLV PLQRU C

LQFRPPXQLFDGR IURF GIDFYKH Q WLK \$UDU HQHW WK R K Q G R L X O N G Z K E
D FRUUHFW SKRQ O R F X P E I H R Q I R S J K W V W M F D O O V Z H U H F O B W L D Q G
PDNH VHYHUHO\ O L L R L X W L Q U Q X K M H V O I Z S D M O S G U H Q Q W R X D G K H D
R W K H U \ V 7 K R L D Q V X L V K R I Q R W V N Z Q R Z U L Q J W I K H U L U B R I Q W U O H R W P E H
K R Z W K H \ Z H U H G R L H Q J J D Q B O W K M R Q S R W Q B H P W D Q N Q Q I X R Q F H V
F R Q W D F W I X U G V M K U H H D [Q F X I L M E D D Q G K I K O G U P H S D V X I Q M U V H D Q I G R P
D S D U W

\$WWDFKPHQW \$ WR 6WDQGDUG)RUP
&ODLPDQW + 3 0 RQ EHKDOI RI \$LBV8HOI DQG KLV PLQRU C

6WDWH WKH 1DWXUH DQG (JWHQWKRI:KDFK),RMPXUWRKH &
%DVLV RI WKH &ODL&ODL,P2DQWU6TKDQKHV,QM XDPG BHUV
RU 'HFHGHQW

7KH IHGHUDO JRYHQQPHQW VHQGL&3UDWRDQGL\$VXWLRQ
LQFOXGLQJ WKHLQW HJKWWWRDIOE EIDLXVHGHV QQRWVVERD KDUP V
FXVWRG\ 7KH JRYHQQPHQW\TVHDFZHDQGLGLJODXGHW-R 3 0 D
\$ 3 & VYHUUH WUDXPD DQG HPRWLRQDO GLVWUHV

7KH JRYHUQPHQW WQDZLVQKDSW3IRUFURDHLGOO WZKXP ZLW
WHUURU GHVSHUD\$XLRQRVHQ&ODQJXQNDK P,WHRQ WKDQ DQG \$
LQVWLOO IHDXHQCFRPSKXQGHG H/ WWKDRWWKHDXPDLQJVDNRHSLQ
DQG \$ 3 & DSDRWDIRSU B [WRDWDHO\ WHGOLOJZLWKRKXQ\WKLQ
RWKHU\TV ZKHUHDQRXZLWKR XZM ODO ERZSLQDNWKRFRB MHQQW WKH
DSSUR[LPDWHO\ GDDQVSDQQ ZRWKRXUHLTXLQJLQJ KHP3 0 WR
EHWZHHQ UHXQLIXFJXWHRQDZLQV \$XKLXFGDQJLWKEIQG EV\GHSRUV
+ 3 0 ZLWKRXW KLVHGDXQJKRHWK\$WJDRYHUQDQ\$QV\QXDFHV ER
DQG \$ 3 & FRQLQWKHWIRIMXFWHUQURWKH VHSUDWLR

+ 3 0 DQG \$ 3 & ZLOO FDUU\ WKW RDUPKERQ HDWRHWKTH
JRYHUQPHQW\TV FRQGRQDKHOUH DQ\$XQMRQDQQRWLYHCHLJHG V

:LWQHVVHV

>5HGDFWHG@

E 3KRQH 1XPEHU RI 3HUVRQ 6LJQLQJ WKH)RUP

ODWWKHZ 6FKQHWLRQHU%&URYLQJ //3
OLFKHOH /DSRLQYHUW6RDXZK&HUQW3HU

\$PRQJ RWKHU FDXVHV RI DFWLRQFONDKIPVDIRWVLQHOLDFWHLGCKIRUHHLPORWKS
LQWHQWLRQDO RU QHJOLJHQW HICDWHLRQVHKLCSFHIZD.XVK QKHSOLDHIGW FEK
IDOVH LPSULVRQPHQDIWWHQGRXLRACKGZPHQW WKR\$WKE 8QLWHG 6WDWHV & F