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14
15 **UNITED STATES DISTRICT COURT**
16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

17 RAHINAH IBRAHIM,

No. 3:06-cv-0545 (WHA)

18
19 Plaintiff,

20 v.

21 DEPARTMENT OF HOMELAND
22 SECURITY, *et al.*,

23 Defendants.
24

**NOTICE OF COMPLIANCE WITH
COURT'S JANUARY 21, 2014 ORDER**

1 Pursuant to the Court's January 21, 2014 Order (Dkt. 686), Defendants hereby attach a
2 redacted version of the December 4, 2013 Declaration of Maureen Dugan. This document was
3 previously filed under seal on December 13, 2013. The redactions are made pursuant to
4 Defendants' Assertion of the Law Enforcement Privilege (Dkt. 649) and the Privacy Act, 5
5 U.S.C. § 552a.

6
7 January 28, 2014

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11 /s/ Paul G. Freeborne
12 PAUL G. FREEBORNE
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Civil Division

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LAW ENFORCEMENT SENSITIVE -- SUBJECT TO PROTECTIVE ORDER

NOT FOR PUBLIC DISSEMINATION

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14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**

16 RAHINAH IBRAHIM,

No. 3:06-cv-0545 (WHA)

17
18 Plaintiff,

19 v.

20 DEPARTMENT OF HOMELAND
21 SECURITY, *et al.*,

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**LAW ENFORCEMENT SENSITIVE -- SUBJECT TO PROTECTIVE ORDER
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DECLARATION OF MAUREEN DUGAN

1. I am the Deputy Executive Director, Office of Field Operations, National Targeting Center ("NTC"). I have held this position since June 2011; prior to that, I was the Assistant Executive Director for Admissibility and Passenger Programs from 2007 to 2011. I have been employed by U.S. Customs and Border Protection (CBP) and its predecessor, the Immigration and Naturalization Service since 1991. I make this declaration on the basis of personal knowledge and knowledge acquired by me in the course of my official duties.
2. CBP established the NTC as a twenty four hour, seven days a week, operation to provide advance targeting, research, and coordination among numerous law enforcement and intelligence agencies. The NTC provides this support in both the passenger and cargo environments. Subsequent to the attempted in-flight bombing of NW flight #253 on December 25, 2009, the National Targeting Center-Passenger ("NTC-P") began vetting all flights prior to their departure from a foreign location to the United States.

3.

4.

DECLARATION OF MAUREEN DUGAN
Ibrahim v. DHS, et al., 3:06-cv-00545 (WHA)

LAW ENFORCEMENT SENSITIVE -- SUBJECT TO PROTECTIVE ORDER
NOT FOR PUBLIC DISSEMINATION

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DECLARATION OF MAUREEN DUGAN
Ibrahim v. DHS, et al., 3:06-cv-00545 (WHA)

LAW ENFORCEMENT SENSITIVE -- SUBJECT TO PROTECTIVE ORDER

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[REDACTED]

10. [REDACTED]

11. [REDACTED]

12. [REDACTED]

13. [REDACTED]

14. [REDACTED]

DECLARATION OF MAUREEN DUGAN
Ibrahim v. DHS, et al., 3:06-cv-00545 (WHA)

LAW ENFORCEMENT SENSITIVE -- SUBJECT TO PROTECTIVE ORDER
NOT FOR PUBLIC DISSEMINATION

15.

[REDACTED]

16.

[REDACTED]

17.

[REDACTED]

18.

[REDACTED]

19.

[REDACTED]

DECLARATION OF MAUREEN DUGAN
Ibrahim v. DHS, et al., 3:06-cv-00545 (WHA)

LAW ENFORCEMENT SENSITIVE -- SUBJECT TO PROTECTIVE ORDER
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7 21. No one from the Department of Justice was involved in the activities described above.
8 None of the actions described in this declaration were intended to prevent her from
9 attending the trial in this matter.

10 22.
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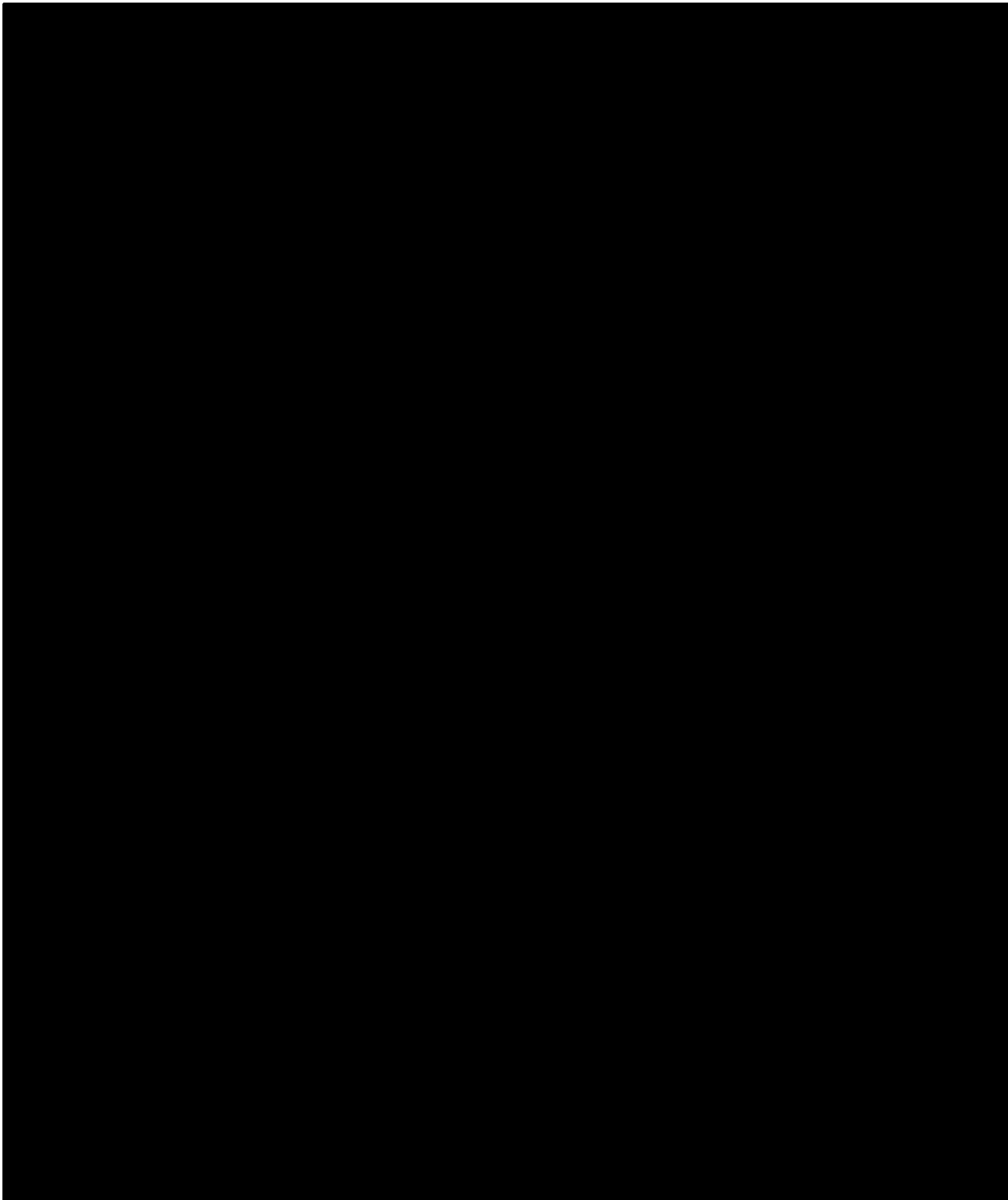
15 23. I declare that the foregoing is true and correct to the best of my knowledge, information
16 and belief.
17

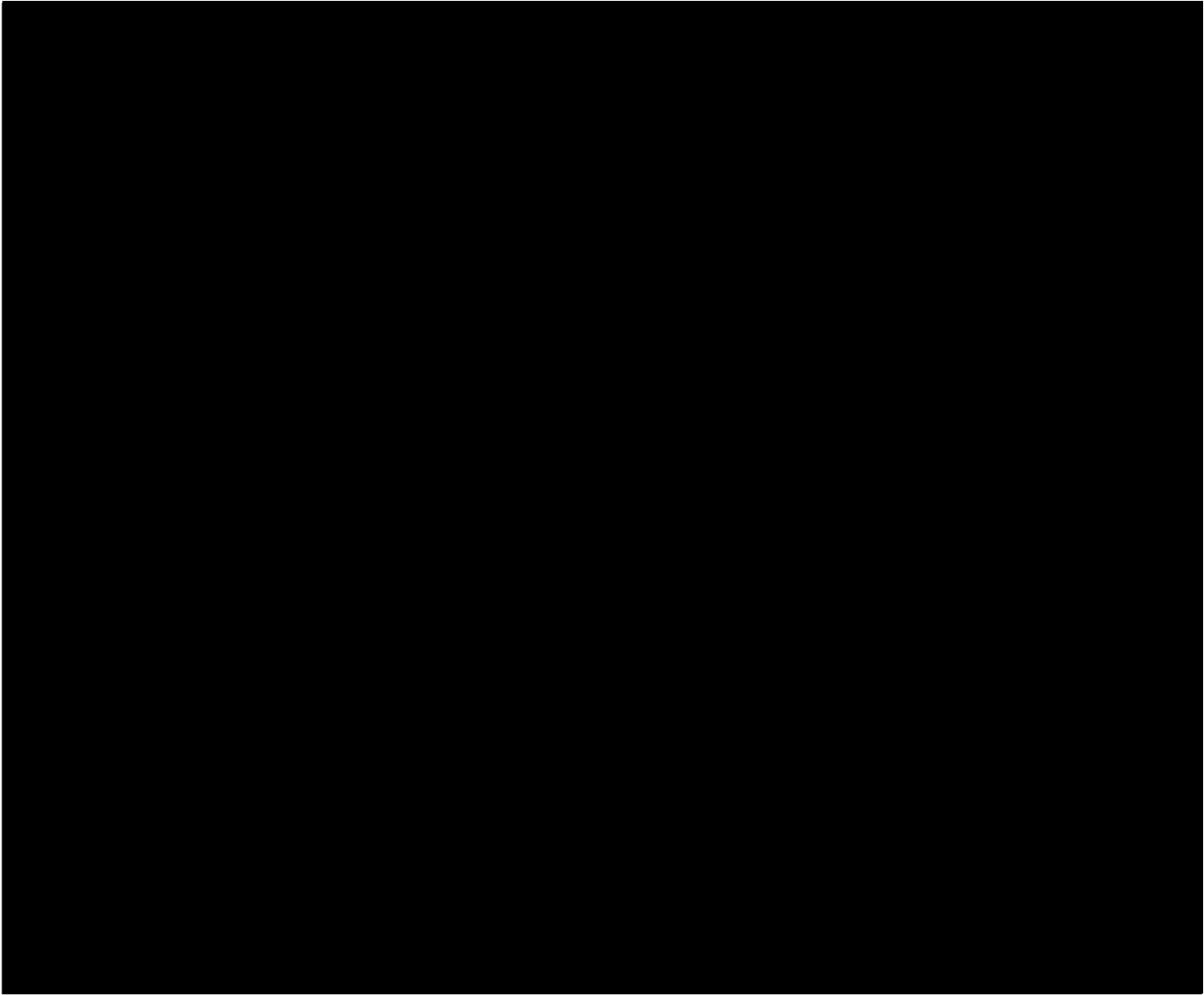
18 DATED: December 4, 2013

19 
20 MAUREEN DUGAN
21
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26 DECLARATION OF MAUREEN DUGAN
27 Ibrahim v. DHS, et al., 3:06-cv-00545 (WHA)
28

Ex.A





Ex.B

U.S. Department of Homeland Security
U.S. Customs and Border Protection
Office of Field Operations
Washington D.C.



**U.S. Customs and
Border Protection**

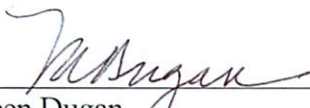
AUTHORIZATION TO TRANSPORT UNITED STATES CITIZEN TO THE UNITED STATES

DATE ISSUED: 03 December 2013
THIS DOCUMENT IS VALID UNTIL: 31 December 2013
NAME OF BEARER: [REDACTED]
DATE OF BIRTH: [REDACTED]
PASSPORT NUMBER / COUNTRY: [REDACTED] United States

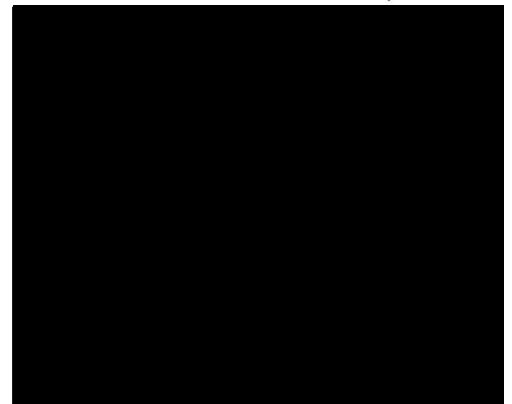
TO: Transportation Company

Presentation of this document confirms for the transportation company the named bearer, whose photograph is attached, may be carried onboard their aircraft for travel to the United States without liability under 8 U.S.C. 1323, given that the individual is a U.S. Citizen. In the event of any questions regarding this letter or a copy of this letter, please contact the Regional Carrier Liaison Group in Honolulu, Hawaii at (808) 237-4632.

Issued by:



Maureen Dugan
National Targeting Center
U.S. Customs and Border Protection



Photograph of Bearer