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

16 RAHINAH IBRAHIM,

17  
18 Plaintiff,

19 v.

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

22 Defendants.  
23  
24

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

**DECLARATION OF MAUREEN DUGAN,  
CUSTOMS AND BORDER  
PROTECTION, IN SUPPORT OF LAW  
ENFORCEMENT PRIVILEGE  
ASSERTION**

**DECLARATION OF MAUREEN DUGAN**

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2  
3 1. I am the Deputy Executive Director, Office of Field Operations, National Targeting  
4 Center (NTC"). I have held this position since June 2011; prior to that, I was the  
5 Assistant Executive Director for Admissibility and Passenger Programs from 2007 to  
6 2011. I have been employed by U.S. Customs and Border Protection ("CBP") and its  
7 predecessor, the Immigration and Naturalization Service since 1991. I make this  
8 declaration on the basis of personal knowledge and knowledge acquired by me in the  
9 course of my official duties.
- 10 2. I make this declaration in support of a claim of law enforcement privilege over the  
11 information contained in my earlier declaration, provided to the Court and to Plaintiff's  
12 counsel on December 4, 2013.
- 13 3. I am appearing in Court in this matter on December 5, 2013. I am expected to testify  
14 regarding the travel of Ms. Mustafa Kamal, Plaintiff's daughter, on Dec 1-2, 2013.
- 15 4. Customs and Border Protection established the NTC as a twenty four hour, seven days a  
16 week, operation to provide advance targeting, research, and coordination among  
17 numerous law enforcement and intelligence agencies. The NTC provides this support in  
18 both the passenger and cargo environments.
- 19 5. In order to provide the information requested by the Court, my testimony will likely  
20 explore present day processes and procedures followed by the National Targeting  
21 Center-Passenger ("NTC-P") in vetting flights before they depart a foreign place for the  
22 United States.
- 23 6. Such testimony will likely encompass factors and methods CBP uses to determine  
24 whether an individual may pose a variety of risks or concerns to the U.S., including but  
25 not limited to national security concerns and inadmissibility issues related to terrorism, as  
26 well as smuggling, human trafficking and other serious concerns.
- 27 7. While these factors may not be present in this specific case, the procedures NTC-P  
28 follows in a variety of circumstances could be revealed in my testimony. For example,

1 my testimony will likely include details regarding the specific information that CBP  
2 reviews during its vetting, the databases that CBP views when making vetting decisions,  
3 the inter-agency coordination which may be necessary to address certain vetting  
4 concerns, and foreign partnerships (including with carriers and governments) that CBP  
5 utilizes.

6 8. Much of this information is not publicly available, and to the extent it is, the explanations  
7 are general in nature (unlike what would be called for to address this specific case) and  
8 exposing it in a public setting would provide potential wrongdoers with a clear view of  
9 the current vetting criteria and processes, thereby allowing them to alter their behavior to  
10 circumvent the protections currently in place in an effort to violate U.S. law.

11 9. I have made the determination that the disclosure of this information to the public would  
12 have a serious detrimental effect on CBP's ability to fulfill its responsibilities, including  
13 its national security mission.

14 10. As a result, my testimony should be presented in closed session, in order to prevent the  
15 public disclosure of this sensitive information.

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17 DATED: December 5, 2013

18 */s/ Maureen Dugan*

19 MAUREEN DUGAN  
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