

DECLARATION OF ERIN FRICKER OF PROJECT CITIZENSHIP

I, Erin Fricker, declare under penalty of perjury and in accord with 28 U.S.C. § 1746 as follows:

1. I am the Legal Director of Project Citizenship. Project Citizenship's office is located at 11 Beacon Street, Suite 720 in Boston, Massachusetts.

2. Project Citizenship seeks to increase the naturalization rate in New England, with a focus on the most vulnerable and disadvantaged populations. Each year, we assist over 1,000 people apply for naturalization and proof of U.S. citizenship with the help of hundreds of trained volunteers. I have directed Project Citizenship's legal efforts since January 2021. I joined Project Citizenship as a Staff Attorney in August 2019.

3. I have provided this declaration based upon my personal knowledge and my review of our client records. These records are the types that are generated in our ordinary course of business and on which I customarily rely when performing my job.

4. As of August 22, 2022, five of our clients for whom we filed applications for naturalization in 2020 with U.S. Citizenship and Immigration Services (USCIS) have never been scheduled for an interview. Based on information provided in response to our inquiries, these cases have been delayed due to "circumstances created by the coronavirus pandemic" or "workload factors." Two additional clients who applied in 2020 have had their previously scheduled interviews cancelled by USCIS and not yet rescheduled.

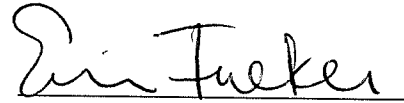
5. Although I understand that USCIS has received the A-files of naturalization applicants that were previously in storage, seven of our clients with naturalization applications filed in 2020 still have not been scheduled for interviews in the future.

6. Based on a review of our client records, USCIS received naturalization applications of our clients on January 19, 2021, March 2, 2021, and April 5, 2021. USCIS scheduled the first-filed for an interview at the Boston Field Office on June 14, 2022, the second-

filed at the same Field Office on May 7, 2021, and the third-filed at the same Field Office on June 30, 2021. I do not know why the first filed application was scheduled for an interview many months later than the two later filed applications.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of August 2022, in Boston, Massachusetts.


Erin Fricker