

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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COLOR OF CHANGE AND CENTER FOR CONSTITUTIONAL RIGHTS,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civil Action No. 16-CV-8215 (WHP)
	:	
UNITED STATES DEPARTMENT OF HOMELAND SECURITY,	:	
	:	
Defendant.	:	
	x	

**DECLARATION OF OMAR FARAH IN SUPPORT OF PLAINTIFFS’  
MOTION FOR SUMMARY JUDGMENT**

I, Omar Farah, hereby declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge:

1. I am an attorney at the Center for Constitutional Rights (“CCR”), co-counsel for Plaintiffs in this litigation. I am admitted to practice in this Court. I make this Declaration in Support of Plaintiffs’ Memorandum of Law in Support of their Motion for Partial Summary Judgment.

2. Attached hereto as Exhibit 1 is a true and correct copy of a chart, “List of Individual Race Paper Documents,” created by Plaintiffs’ counsel. This chart lists eight entries with corresponding Bates numbers, and contains information from Defendants’ *Vaughn* index for each entry. The corresponding documents were produced to Plaintiffs by DHS on May 22, 2017, June 19, 2017 and January 9, 2018. True and correct copies of the documents listed in this chart are annexed to Exhibit 1 as Documents A-H.

3. Attached hereto as Exhibit 2 is a true and correct copy of an excerpted record from Defendant DHS's August 1, 2017 document production, Bates No. NPPD 2034-2036.

4. Attached hereto as Exhibit 3 is a true and correct copy of an excerpted record from Defendant DHS's May 22, 2017 document production, Bates No. IALI 253-255.

5. Attached hereto as Exhibit 4 is a true and correct copy of an excerpted record from Defendant DHS's May 22, 2017 document production, Bates No. IALI 318-324.

6. Attached hereto as Exhibit 5 is a true and correct copy of an excerpted record from Defendant DHS's May 22, 2017 document production, Bates No. IALI 261-262.

7. Attached hereto as Exhibit 6 is a true and correct copy of an excerpted record from Defendant DHS's June 2, 2017 document production, Bates No. NPPD 282-283.

8. Attached hereto as Exhibit 7 is a true and correct copy of a chart, "List of 'Race Paper'-Related Emails," created by Plaintiffs' counsel. This chart lists seven entries with corresponding Bates numbers, along with the date, subject line and attachment file name in each entry. The corresponding documents were produced to Plaintiffs by DHS on May 22, 2017. True and correct copies of the documents listed in this chart are annexed to Exhibit 7 as Documents A-G.

9. Attached hereto as Exhibit 8 is a true and correct copy of the *Vaughn* index provided by Defendant DHS *Vaughn* index, transmitted to Plaintiffs' counsel via email from Defendants' counsel on January 9, 2018.

Date: March 19, 2018

New York, New York

Respectfully submitted,



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