

EXHIBIT 20

From: Palmer, David [REDACTED]
Sent: Wednesday, August 30, 2017 1:40 PM
To: Nuebel Kovarik, Kathy [REDACTED]; Hamilton, Gene [REDACTED]; McDonald, Christina [REDACTED]
Cc: Symons, Craig M [REDACTED]; Maher, Joseph [REDACTED]; Baroukh, Nader [REDACTED]; Shah, Dimple [REDACTED]; McCament, James W [REDACTED]
Subject: RE: Sudan TPS

Gene

I added you to the chain between Christina McDonald and Policy.

Best,

David

David J. Palmer
Chief of Staff
Office of the General Counsel
U.S. Department of Homeland Security

From: Nuebel Kovarik, Kathy
Sent: Wednesday, August 30, 2017 1:37 PM
To: Hamilton, Gene [REDACTED]; McDonald, Christina [REDACTED]
Cc: Symons, Craig M [REDACTED]; Maher, Joseph [REDACTED]; Palmer, David [REDACTED]; Baroukh, Nader [REDACTED]; Shah, Dimple [REDACTED]; McCament, James W [REDACTED]
Subject: RE: Sudan TPS

New memo signed, FRNS completed. All should have been sent up. Cristina was sharing with Policy to get concurrence again.

From: Hamilton, Gene
Sent: Wednesday, August 30, 2017 1:35:41 PM
To: Nuebel Kovarik, Kathy; McDonald, Christina
Cc: Symons, Craig M; Maher, Joseph; Palmer, David; Baroukh, Nader; Shah, Dimple; McCament, James W
Subject: RE: Sudan TPS

What's the latest here?

Gene P. Hamilton
Senior Counselor to the Secretary
U.S. Department of Homeland Security

From: Nuebel Kovarik, Kathy
Sent: Wednesday, August 30, 2017 11:55 AM
To: McDonald, Christina [REDACTED]
Cc: Symons, Craig M [REDACTED]; Maher, Joseph [REDACTED]; Palmer, David [REDACTED]; Baroukh, Nader [REDACTED]; Shah, Dimple [REDACTED]; McCament, James W [REDACTED]; Hamilton, Gene [REDACTED]
Subject: RE: Sudan TPS

Esex is packaging right now. New memo is signed. FRNs cleared by OCC and me.

Kathy Nuebel Kovarik
Chief, Office of Policy and Strategy
U.S. Citizenship and Immigration Services

This email, along with any attachments, is intended solely for the use of the addressee(s) and may contain information that is sensitive or protected by applicable law. Unauthorized use or dissemination of this email and any attachments is strictly prohibited. If you are not the intended recipient, please notify the sender and delete or destroy all copies.

From: McDonald, Christina
Sent: Wednesday, August 30, 2017 11:36 AM
To: Nuebel Kovarik, Kathy
Cc: Symons, Craig M; Maher, Joseph; Palmer, David; Baroukh, Nader; Shah, Dimple; McCament, James W; Hamilton, Gene
Subject: RE: Sudan TPS

Kathy:

I'm not trying to be a pest again. But ESEC just checked in with me, and so I'm checking with you folks. When do you folks think USCIS will send the updated TPS Sudan/South Sudan packages to OGC?

PLCY requires the updated memo so that they can clear the memo. And ESEC requires PLCY's clearance before the package can move forward.

Christina E. McDonald
[REDACTED]
[REDACTED]

This communication, along with any attachments, is covered by federal and state law governing electronic communications and may contain confidential and legally privileged information. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, use or copying of this message is strictly prohibited. If you have received this in error, please reply immediately to the sender and delete this message. Thank you.

From: Nuebel Kovarik, Kathy
Sent: Wednesday, August 30, 2017 7:51 AM
To: McDonald, Christina [REDACTED]
Cc: Westmoreland, Megan [REDACTED]
Subject: RE: Sudan TPS

That's the plan. Assume he will sign, send to exec sec and have it sent up again.

Kathy Nuebel Kovarik
Chief, Office of Policy and Strategy
U.S. Citizenship and Immigration Services
[REDACTED]

From: McDonald, Christina
Sent: Wednesday, August 30, 2017 7:48 AM
To: Nuebel Kovarik, Kathy
Cc: Westmoreland, Megan
Subject: RE: Sudan TPS

Ok. So you folks will send it on over once James signs (or approves autopen)?

Christina E. McDonald
Office of the General Counsel
U.S. Department of Homeland Security
[REDACTED]
[REDACTED]

From: Nuebel Kovarik, Kathy
Sent: Wednesday, August 30, 2017 12:26:12 AM
To: McDonald, Christina
Subject: RE: Sudan TPS

Just sent a revised memo to James. Apologies.

Kathy Nuebel Kovarik
Chief, Office of Policy and Strategy
U.S. Citizenship and Immigration Services
[REDACTED]

From: McDonald, Christina
Sent: Tuesday, August 29, 2017 10:31 PM
To: Hamilton, Gene; Nuebel Kovarik, Kathy; Shah, Dimple; McCament, James W; Baroukh, Nader; Symons, Craig M
Cc: Petyo, Briana; Westmoreland, Megan; Maher, Joseph
Subject: RE: Sudan TPS

Kathy - will you guys send an updated memo on Wed am? We can then send it to ESEC and ask them to swap out the doc.

Christina E. McDonald
Office of the General Counsel
U.S. Department of Homeland Security
[REDACTED]
[REDACTED]

From: Hamilton, Gene
Sent: Tuesday, August 29, 2017 10:10:35 PM
To: Nuebel Kovarik, Kathy; Shah, Dimple; McCament, James W; McDonald, Christina; Baroukh, Nader; Symons, Craig M
Cc: Petyo, Briana

Subject: RE: Sudan TPS

We need to repackage.

Gene P. Hamilton
Senior Counselor to the Secretary
U.S. Department of Homeland Security

From: Nuebel Kovarik, Kathy
Sent: Tuesday, August 29, 2017 10:09 PM
To: Hamilton, Gene [REDACTED]; Shah, Dimple [REDACTED]; McCament, James W [REDACTED]; McDonald, Christina [REDACTED]; Baroukh, Nader [REDACTED]; Symons, Craig M [REDACTED]
Cc: Petyo, Briana [REDACTED]
Subject: RE: Sudan TPS

Well, I will take the blame for this. The options memo went up, and because of our rush to add recommendations, I didn't catch the contradiction. How would you like us to proceed?

Kathy Nuebel Kovarik
Chief, Office of Policy and Strategy
U.S. Citizenship and Immigration Services
[REDACTED]

From: Hamilton, Gene
Sent: Tuesday, August 29, 2017 9:52 PM
To: Shah, Dimple; McCament, James W; McDonald, Christina; Baroukh, Nader; Nuebel Kovarik, Kathy; Symons, Craig M
Cc: Petyo, Briana
Subject: Sudan TPS
Importance: High

My understanding is that there is a problem with the Sudan TPS memo.

On page 1 of the decision memo it says:

assessment and recommendation are under review by Secretary Tillerson's office. The draft package that was submitted to Secretary Tillerson's office for review assesses that the statutory conditions supporting Sudan's TPS designation continue to be met and recommends an 18-month extension of Sudan's designation for TPS. This memorandum relies upon the content of the draft

At the bottom of page 3 it says this:

Options

Your options include the following actions:

- 1) *Extend Sudan's Designation for TPS*

Under the TPS statute, if you determine that the statutory conditions supporting a country's designation for TPS continue to exist, you must extend the TPS designation for an additional period of 6, 12, or 18 months. The review of conditions in Sudan indicates that it remains unsafe for individuals to return to Sudan and that the statutory requirements to designate a country for TPS under *Immigration and Nationality Act* § 244(b)(1)(A) (ongoing armed conflict) and under § 244(b)(1)(C) (extraordinary and temporary conditions) continue to be met.

On page 4 it says:

3) *Terminate Sudan's Designation for TPS*

If you determine that Sudan no longer continues to meet the statutory requirements for its TPS designation, you must terminate TPS for Sudan. Termination would end TPS benefits for existing Sudanese TPS beneficiaries. Upon the termination of TPS benefits, former beneficiaries without another immigration status or authorization to remain would no longer have permission to work and remain in the United States. Because the conditions supporting Sudan's TPS designation persist, termination does not appear to be warranted.

And then on page 5, despite all the foregoing, the recommendation is to *terminate* TPS for Sudan!

Recommendation: USCIS recommends termination, but to delay the effective date of the termination by 12 months to provide for an orderly transition for those recipients to return to Sudan. This recommendation is supported by the following factors:

Gene P. Hamilton
Senior Counselor to the Secretary
U.S. Department of Homeland Security