

EXHIBIT 73

THE DEPUTY SECRETARY OF STATE
WASHINGTON

September 1, 2017

The Honorable
Elaine C. Duke
Acting Secretary of the Department of Homeland Security
Washington, DC 20528

Dear Acting Secretary Duke:

As conditions in Sudan prevent its nationals and habitual residents from returning in safety, I recommend that you extend the Temporary Protected Status (TPS) designation for Sudan when the current designation expires on November 2, 2017, for a period of six months due to ongoing armed conflict and extraordinary and temporary conditions in the country. To help inform your decision, the Department of State has prepared the enclosed Country Conditions Report, which finds that the conditions that served as the basis for the previous extension effective May 3, 2016, continue to exist.

While we have engaged the government of Sudan since June 2016 under the Five Track Engagement Plan to take positive steps in several key areas, including maintaining a unilateral cessation of hostilities, armed conflict in Sudan continues. In Darfur, while fighting between government forces and the armed opposition largely ceased in September 2016 -- a partial outcome of Five Track engagement -- intertribal armed conflict and actions by armed militias continue to generate insecurity. In 2016, armed conflict displaced 97,500 people in Darfur and 3,026 people in the "Two Areas" (South Kordofan and Blue Nile states). In 2017, international organizations reported 7,600 newly displaced persons in North Darfur and potentially new, although unverified, displacements in South Darfur and West Kordofan states. In March, the UN Office for the Coordination of Humanitarian Affairs reported that in the government-controlled areas of South and West Kordofan, 4,139 and 2,764 people were displaced, respectively. The majority of those displaced over the past fourteen years -- currently around 2 million in Darfur since 2003 and 230,000 in the Two Areas since 2011 -- have not yet returned home due to persistent insecurity.

The extraordinary and temporary conditions that served as a basis for the previous extension of Sudan's TPS designation also continue to exist. Pre-dating and apart from the Five Track plan, the United States has pressed Sudan to improve its human rights record. Despite this effort, Sudan's overall human rights and religious freedom records remain extremely poor. The government continues to violently suppress protests and abuse members of certain populations, including activists, youth, journalists, and those belonging to, or perceived as belonging to, political opposition groups. Although drought and flooding that occurred in 2016 no longer prevent Sudan from adequately supporting the return of its nationals, populations in some conflict-affected areas continue to experience acute levels of food insecurity. One of the overarching goals in our bilateral relationship through the Five Track process with Sudan, and beyond, remains achieving sufficient progress in key areas (including internal peace and respect for human and religious rights) that would allow for an end to TPS status for Sudan. Even if

there is a decision to revoke certain sanctions against Sudan through the Five Tracks, conditions that merit extension of TPS will continue.

For these reasons, I recommend that you extend by six months the TPS designation for Sudan when the current designation expires on November 2, 2017. A six-month extension will allow for a timely review should conditions change given our ongoing efforts to improve relations with and conditions in Sudan.

Sincerely,

A handwritten signature in black ink, appearing to read "John J. Sullivan". The signature is fluid and cursive, with a large initial "J" and "S".

John J. Sullivan

Enclosure