



From: "Sullivan, Elizabeth A. (CIV)" <Elizabeth.A.Sullivan@usdoj.gov>
Date: Wednesday, September 30, 2020 at 9:22 AM
To: FOIA <foia@americanoversight.org>
Cc: "Sullivan, Elizabeth A. (CIV)" <Elizabeth.A.Sullivan@usdoj.gov>
Subject: U.S. Department of Justice FOIA Request 145-FOI-17365

Good morning Mr. Evers,

Please find attached the Civil Division's response to FOIA request 145-FOI-17365.

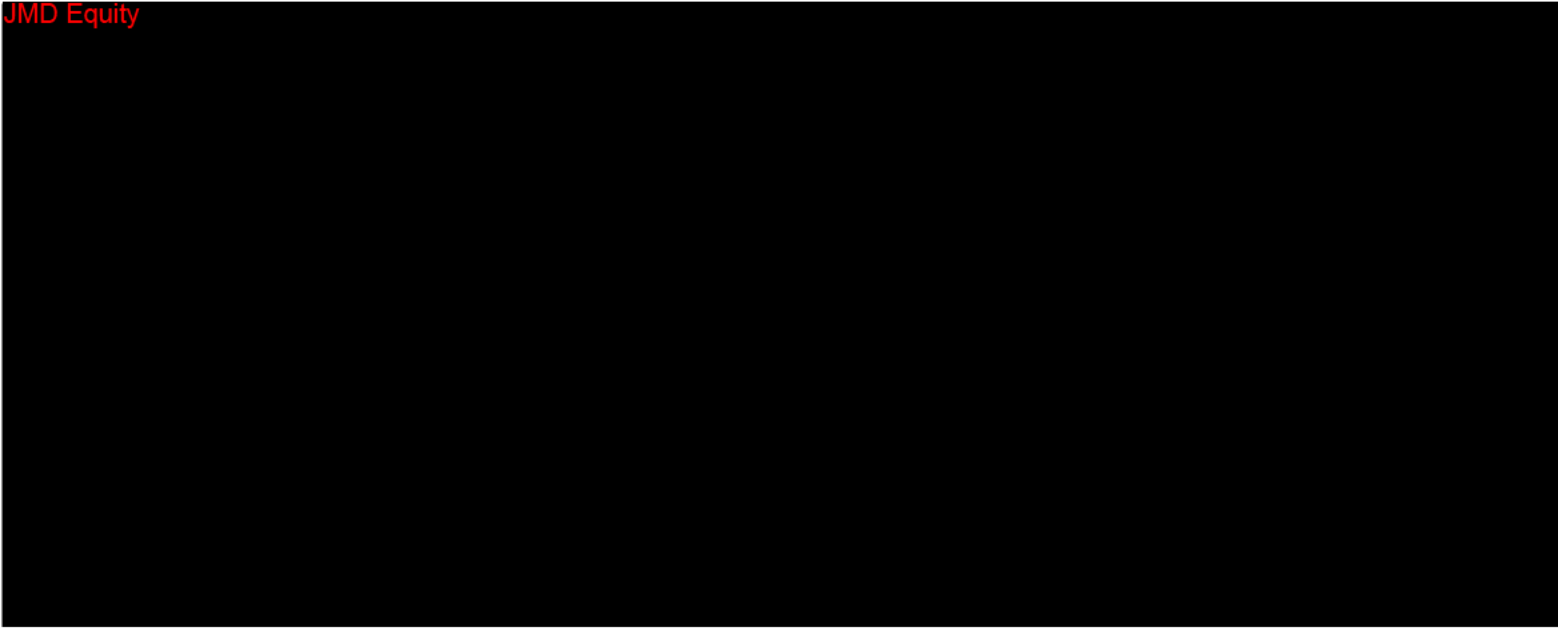
Thank you,
Elizabeth

Elizabeth A. Sullivan
Senior FOIA Counsel
FOIA, Privacy, and E-Discovery Office
Civil Division
Department of Justice
1100 L Street, NW
Washington, DC 20530
t: (202) 353-8704

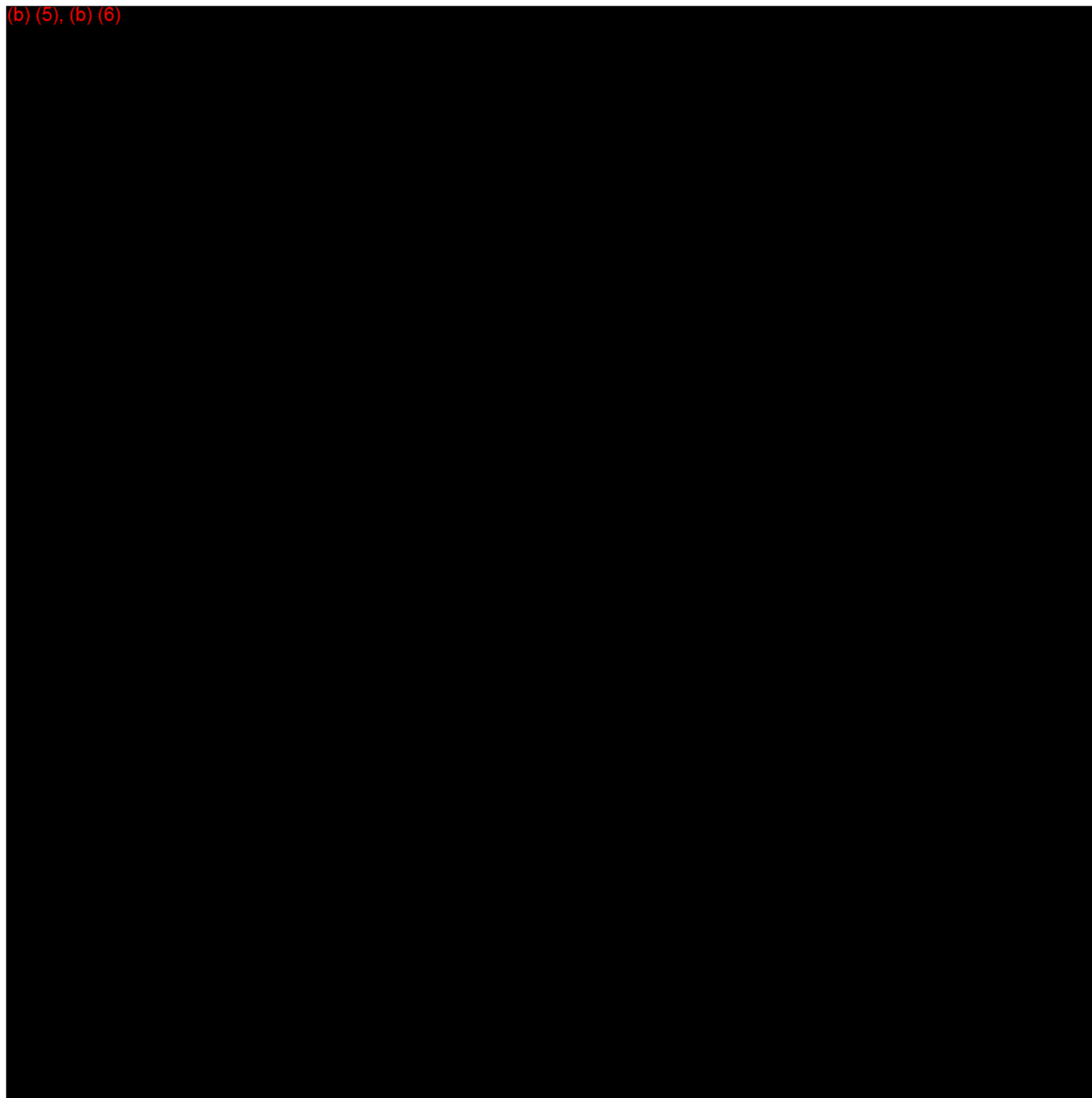
From: Hunt, Jody (CIV) (b) (6)
Sent: Wednesday, February 26, 2020 12:12 PM
To: Murray, Claire M. (OASG) (b) (6)
Subject: FW: Denat Release DRAFT 02.24.2020

From: Perkins, Paul R. (CIV) (b) (6)
Sent: Wednesday, February 26, 2020 12:10 PM
To: Hunt, Jody (CIV) (b) (6)
Subject: FW: Denat Release DRAFT 02.24.2020

JMD Equity



(b) (5), (b) (6)



From: Hunt, Jody (CIV) (b) (6)
Sent: Wednesday, February 26, 2020 11:56 AM
To: Civ-Gov <(b) (6)>
Subject: Message . . .

Civil Division Colleagues,

I am pleased to announce the creation of a new section within the Office of Immigration Litigation – the Denaturalization Section.

The Denaturalization Section will investigate and litigate revocation of naturalization cases against

DOJ-20-1256-A-000002

terrorists, war criminals, sex offenders, and other fraudsters. Attorneys in the Office of Immigration Litigation's District Court Section (OIL-DCS) already have achieved great success in the denaturalization cases they have thus far brought – in fact, they have won about 95% of the time (this may be a Civil Division record!). In *U.S. v. Kariye*, for example, OIL attorneys successfully sought the civil denaturalization of an individual who received military training in a jihadist training camp in Afghanistan; coordinated with Osama bin Laden and other known terrorist leaders; and was associated with terrorist organizations including Makhtab Al-Khidamat, a U.S. government-designated terrorist organization and pre-cursor to al Qaeda. And in *U.S. v. Arizmendi*, OIL attorneys successfully sought civil denaturalization of an individual convicted of multiple sex offenses, including as to students.

In large part because of the tremendous successes of our dedicated attorneys in OIL – and the growing number of referrals anticipated from law enforcement agencies – creating a new section devoted to denaturalization cases enables us to further prioritize this important work and dedicate particular resources to it. We will transition the denaturalization work from OIL-DCS to the new Denaturalization Section, which will allow OIL-DCS to focus on the many other responsibilities it has been tasked with handling, including a growing number of significant class actions and other cases. The new Denaturalization Section will have an SES Director, a hiring announcement of which will soon be posted.

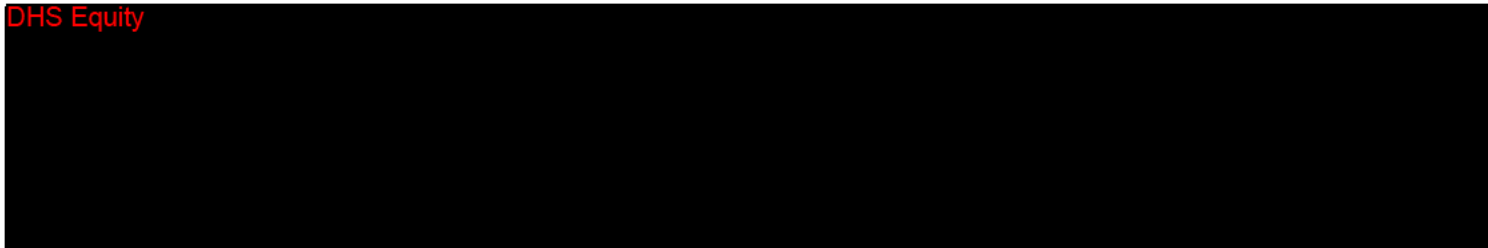
Please join me in thanking our OIL attorneys whose efforts and achievements have made possible the creation of the new Denaturalization Section!

Jody

From: Stewart, Scott G. (CIV) </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=92182393664F45AEAC9E75140BB78B93-STEWARD, SC>
Sent: Wednesday, March 11, 2020 1:03 PM
To: Canter, Nancy K (b) (6)
Subject: Re: New Denatz Unit at OIL

Thanks, Nancy—you too!

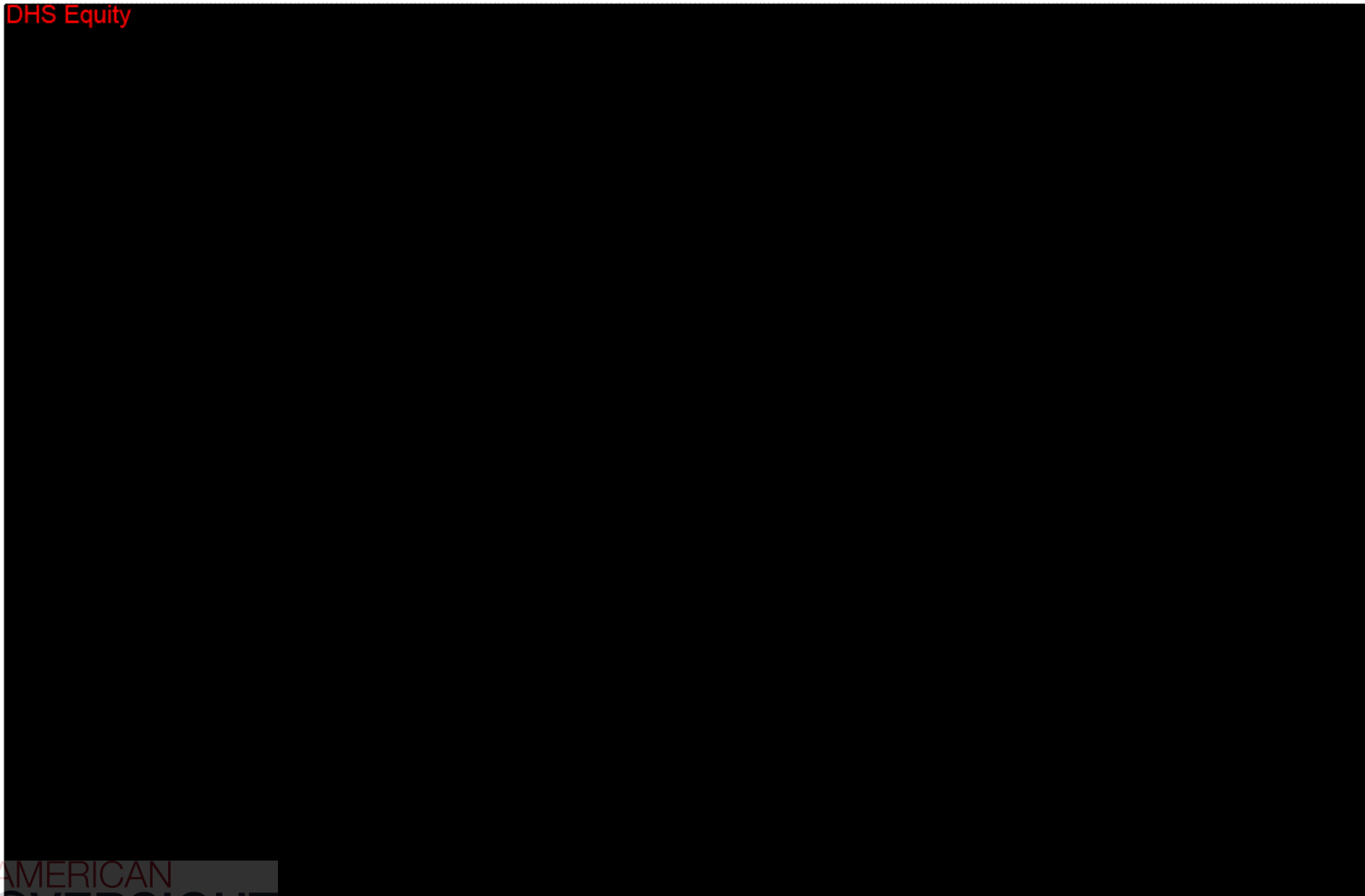
DHS Equity



From: Stewart, Scott G. (CIV) (b) (6)
Sent: Friday, February 28, 2020 4:42 PM
To: Canter, Nancy K (b) (6)
Subject: RE: New Denatz Unit at OIL

Thanks for reaching out, Nancy—it's good to hear from you. Can we try to connect when you're in town? I hope your work is going well on the west coast.

DHS Equity



I. Introduction:

The Office of Immigration Litigation (OIL) has jurisdiction over and is responsible for the nationwide coordination of immigration matters of all civil immigration litigation before the federal district courts and circuit courts of appeals. OIL has three sections. The District Court Section (OIL-DCS) handles both affirmative and defensive litigation in federal district courts, as well as the appeals which arise from those cases. The Appellate Section (OIL-Appellate) defends the Government in every petition for review filed in the United States Courts of Appeal, which account for 12% of all the federal appeals currently filed, and in those same cases which are remanded to the district court. The Denaturalization Section (OIL-Denaturalization) handles investigation and litigation of civil denaturalization cases. All three sections of OIL work closely with United States Attorneys' Offices on immigration-related cases. OIL provides support and counsel to all federal agencies involved in the admission, regulation, and removal of aliens under our immigration and nationality statutes, as well as related areas of border enforcement and national security.

The Director, Office of Immigration Litigation (Denaturalization Section) manages both the litigation and administrative responsibilities required of the Section under the direction of the Deputy Assistant Attorney General (DAAG). In addition to the leadership and management roles required, the incumbent serves as a senior litigation specialist and, as such, oversees the most difficult litigation in this area, personally directing and supervising the handling of the most complicated cases, and providing expert advice and counsel to the DAAG or the Assistant Attorney General.

II. Duties and Responsibilities:

1. The incumbent supervises and directs the work of subordinate managers, in assigning and distributing the work of the unit. This work includes the review and approval of pleadings, briefs and other papers filed with the courts, and the counseling of attorneys concerning approaches and strategies to be followed in preparing for or presenting the case.
2. Confers with and directs subordinate supervisors and attorneys concerning all aspects of their work and performs both official and informal appraisals. Advises and consults with staff on new program orientations or directives and ensures that adequate resources will be available for implementation. Evaluates organizational structures and makes necessary changes based on new case load requirements or policy directives.
3. Personally oversees the briefing and argument of the most difficult and precedent-setting cases falling within the OIL-Denaturalization Section.

4. Communicates with client agencies at the Department of Homeland Security and its Office of General Counsel, and EOIR, on a regular basis concerning cases, case management, trends, and related policy matters as appropriate.
5. Analyzes and reviews proposed and pending legislation which may affect the work of the OIL Denaturalization Section or which is in any way related to its responsibilities. Comments on or makes recommendations to revise, support, or oppose such legislation and assists in formulating the Department's position concerning the same. Occasionally testifies before Congressional committees on this legislation as a representative of the Department of Justice.
6. Represents the AAG to the officials and judges of the applicable courts in connection with all matters relating to the OIL Denaturalization Section and the Division's business with the court. Also represents the Division on various interdepartmental committees or activities with respect to related matters and in dealing with counsel for litigants or others, including members of Congress.
7. Makes decisions involving the management of personnel, budget resources, and operational issues of concern to OIL Denaturalization Section . Personnel management activities (including the selection, development, assessment, and promotion of employees) are performed with proper consideration given to the provisions of Merit Promotion and Equal Opportunity.

III. Controls Over Work:

The Director manages the extensive responsibilities of this Section under the minimal supervision of the DAAG. Only the most significant policy and litigation matters are discussed with the DAAG or the AAG as necessary. In general, litigation determinations made are not reviewed by any higher authority unless there are substantial policy implications that require involvement by the DAAG or the AAG. Recommendations made by the incumbent are normally accepted without reservation. Review of work is in terms of overall performance of assignments and demonstrations of legal judgment and expertise.

IV. Position Designation:

This position is classified as CAREER RESERVED in that it is necessary to restrict appointments to career employees in order to ensure impartiality or the public's confidence in the impartiality of the government.

TIM BELSAN

(b) (6)

EXPERIENCE

United States Department of Justice, Office of Immigration Litigation Washington, DC
Chief / Assistant Director, National Security & Affirmative Litig. Unit Dec. 2018-present
Acting Chief, National Security & Affirmative Litig. Unit Apr. 2017-Dec. 2018

- Supervise 12 attorneys directly and more than 50 attorneys on case-by-case basis, regarding the handling of 500+ cases involving national-security nexus, egregious fraud, or criminal conduct, in particular cases against terrorists, war criminals, murderers, spies, and sex offenders
- Responsible for selecting office's affirmative cases, overseeing all investigations, developing litigation strategy, reviewing filings, and training attorneys
- Leading office's integration into the Human Rights Violators and War Crimes Center as full agency member
- Primary responsibility for redesigning and overseeing office's affirmative litigation practice, achieving more than 600% growth
- Tried multiple cases to verdict
- Design and provide legal training for AUSAs, federal agents, and agency counsel nationwide

Deputy Chief, National Security & Affirmative Litig. Unit Jan. 2017-Apr. 2017

- Supervise team of 10 attorneys handling approximately 100 cases involving national security or a high media profile
- Launched nationwide training program

Senior Litigation Counsel, National Security & Affirmative Litig. Team Feb. 2016-Jan. 2017

- Intermediate supervisor for team of attorneys, responsible for reviewing filings and advising on litigation strategy
- First-chair counsel for cases involving complex issues, including *inter alia* the Political Question Doctrine, administrative law, and class action litigation

Trial Attorney, General Litigation Team Nov. 2011-Feb. 2016

- Served as lead counsel in over 120 civil suits relating to immigration in federal district courts and before the courts of appeals, and worked closely with the United States Attorneys' Offices in over 90 other cases
- Responsible for all phases of the litigation process, including motions practice, discovery, trial, settlement negotiations, and appellate briefing and argument
- Litigate cases involving the Administrative Procedure Act, the Immigration and Nationality Act, habeas corpus, *Bivens* claims, and constitutional questions

Awards: • 2020 Recipient – OMB Gears of Government Award

- 2019 & 2013 Recipient – Attorney General's Award for Distinguished Service
- 2019 & 2018 Recipient – DOJ Civil Division Special Commendation Award
- 2017 Recipient – DOJ Civil Division Training & Prof. Development Award
- 2015 Honoree – DOJ Civil Division Outstanding Mentor
- 2012 Recipient – DOJ Civil Division Rookie of the Year Award

TIM BELSAN

(b) (6)

United States Attorney's Office for the Eastern District of Virginia

Alexandria, VA

Special Assistant United States Attorney, Criminal Division (detail)

May 2015-Feb. 2016

- Investigated and prosecuted wide variety of misdemeanor and felony cases
- Tried cases to verdict

Washburn University School of Law

Topeka, KS

Adjunct Professor of Law

Summer 2011

- Taught Professional Responsibility, an ethics course required for graduation, to over 60 second- and third-year law students
- Created syllabus, designed course assignments, and wrote and graded final exams

United States Court of Appeals for the Tenth Circuit

Lawrence, KS

Law Clerk for the Hon. Deanell Reece Tacha

Aug. 2009-May 2011

- Drafted bench memoranda and more than 40 proposed opinions

BAR MEMBERSHIPS

State: Kansas; Missouri (inactive)

Federal: U.S. Supreme Court; most federal circuit and district courts

EDUCATION

Naval Postgraduate School, Center for Homeland Defense & Security

Monterey, CA

Executive Leaders Program

2019-20

Washburn University School of Law

Topeka, KS

Juris Doctor

Summa Cum Laude

May 2009

G.P.A.: 3.91

Class Rank: 1/137

Honors: *Washburn Law Journal*

- Editor-in-Chief

2008-09

J.L. Weigand Trust Scholarship

- 3-time recipient of Kansas' most prestigious law school scholarship

Awarded the Top Paper in 14 of 25 graded courses

Newman University

Wichita, KS

Bachelor of Arts, English

Minor: Journalism

Dec. 2005

G.P.A.: 4.0 *Summa Cum Laude*

Honors:

- Editor-in-Chief of Student Newspaper, Literary Journal, & Humanities Journal
- Creative Achievement Award

(b) (6)

TIM BELSAN

(b) (6)

PUBLICATIONS

- Aram A. Gavoor & Timothy M. Belsan, *The Forgotten FISA Court: Exploring the Inactivity of the ATRC*, OHIO ST. UNIV. L.J. (forthcoming April 2020)
- Timothy M. Belsan & Aaron R. Petty, *Civil Revocation of Naturalization: Myths & Misunderstandings*, 56 CAL. W. L. REV. 1 (Fall 2019)
- Timothy M. Belsan et al., *The Resurgence of Denaturalization: The Supreme Court's Decision in Maslenjak and Its Initial Impact on Civil and Criminal Cases Seeking Revocation of U.S. Citizenship*, U.S. ATTORNEYS' BULLETIN, Jan. 2018.
- Timothy M. Belsan et al., *OIL-DCS Availability for Assistance and Support in Denaturalization Prosecutions under 18 U.S.C. § 1425*, U.S. ATTORNEYS' BULLETIN, July 2017.
- Timothy M. Belsan et al., *Civil Immigration Enforcement in National Security Cases*, U.S. ATTORNEYS' BULLETIN, July 2017.
- Timothy M. Belsan & Anthony D. Bianco, *Civil Denaturalization: Revoking Unlawfully Gained U.S. Citizenship*, U.S. DEP'T OF JUSTICE MONOGRAPH, Dec. 2016.

COMMUNITY INVOLVEMENT

(b) (6)

INTERESTS

(b) (6)

TIM BELSAN

(b) (6)

April 19, 2020

Crystal Roy
Civil Division, Human Resources
U.S. Department of Justice
1100 L Street, NW
Washington, DC 20530

Via E-Mail to: Civil.SES-vacancies@usdoj.gov

Re: SES-10729892-20-CR

Dear Hiring Committee:

Please accept my application for the Director position within the Office of Immigration Litigation – Denaturalization Section. As explained below and in my resume and essays, I believe I have the background, skillset, and personality needed to lead the Denaturalization Section to success from day one.

I have been with the Office of Immigration Litigation – District Court Section for eight years and have been serving as the Chief of its National Security and Affirmative Litigation Unit since April 2017. In that role, I oversee a rapidly growing number of attorneys and cases, including hundreds of open investigations and denaturalization cases against terrorists, spies, war criminals, human rights violators, sex offenders, and fraudsters. I am our office’s primary liaison to the U.S. Attorneys’ Offices and our law enforcement partners for such cases, regularly working with senior leadership at multiple departments, as well as interacting with and presenting to U.S. Attorneys. I am also a member of multiple interagency working groups, and have primary responsibility for our office’s recent membership in the Human Rights Violators and War Crimes Center.

My leadership and insight into the area of civil denaturalization arises directly from my time in the trenches: prosecuting dozens of cases, drafting what would become the model pleadings, and innovating tactics and establishing best practices for maximizing success while ensuring efficient resource expenditure. I have served as trial counsel for more civil denaturalization trials than anyone in the Department, I have personally reviewed over 100 complaints and innumerable other briefs and filings, and moot all denaturalization-related oral arguments, and I was the lead author for the Department’s monograph on the topic. I am also a frequent lecturer on both civil and criminal denaturalization, having trained more than 2,000 attorneys, agents, and officers over the past four years. And despite my extensive management responsibilities, I still personally handle a few select cases each year, ensuring that I understand first-hand the realities of litigation on the front lines and enabling me to more easily identify areas for improvement in our practice.

Critically, however, I believe I also have both the managerial experience and vision required to thrive as the Director of a high-profile, affirmative litigation section. I previously stood up a unit of a dozen attorneys, including establishing most of its policies and practices from scratch, taking over as acting chief only three months after its creation. While doing so, I conceptualized, developed, and

implemented an award-winning national training program on the topic of civil denaturalization. I have helped design and oversee multiple interagency operations, including two that have successfully identified dozens of convicted sex offenders who concealed their crimes in order to naturalize. My litigation and supervision of civil denaturalization prosecutions, and my management of this departmental priority area, have been recognized with numerous awards, including the Attorney General's Award for Distinguished Service (2019), two Civil Division Special Commendation Awards (2019, 2018), and, earlier this year, the Office of Management and Budget's Gears of Government Award, the first time it has been awarded to Civil Division personnel.

I have been passionate about civil denaturalization since I handled my first case in 2013. These prosecutions have consistently brought me the most personal and professional fulfillment during my time with the Department. My devotion to these cases has propelled me constantly to seek out ways to improve the methods and manner in which we litigate, never settling for the status quo. Having invested so much of myself into this area of law and practice, it would be an honor to serve as the founding Director for a section dedicated to this important work, and I believe I am uniquely equipped to serve in that role.

Thank you for taking the time to consider my application. I would welcome the opportunity to meet with you and discuss how my skills and experience might fit your vision for the Denaturalization Section and its development as one of the premier litigation arms of the Department.

Sincerely,

Tim Belsan

From: [Tim Belsan](#)
To: [SES-vacancies, Civil](#)
Subject: Announcement # SES-10729892-20-CR
Date: Sunday, April 19, 2020 9:11:28 PM
Attachments: [Tim Belsan Cover Letter.pdf](#)
[Tim Belsan Resume.pdf](#)
[Tim Belsan - Statement on Mandatory Technical Qualifications.pdf](#)
[Tim Belsan - Statement on SES ECQs.pdf](#)

Good evening:

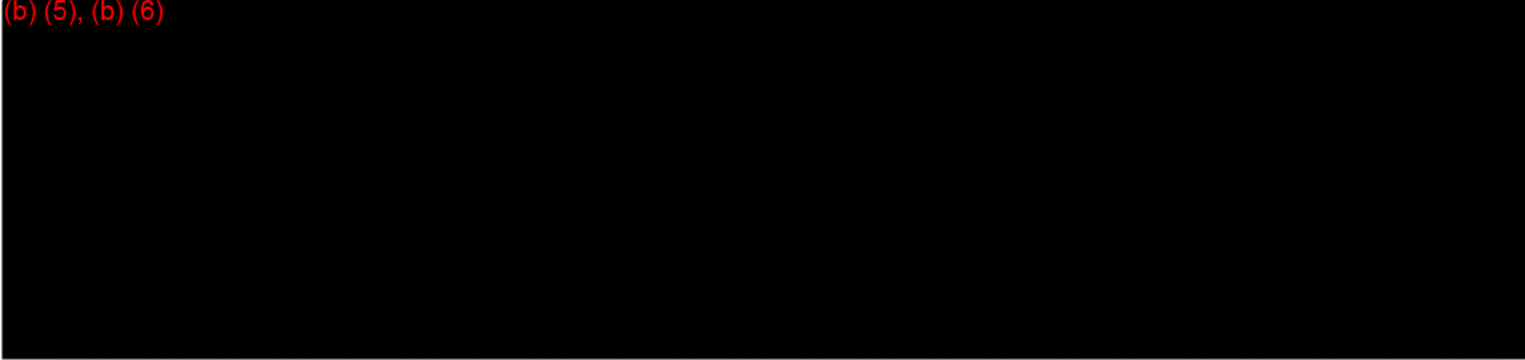
Please accept my application for the Director opening within the Office of Immigration Litigation - Denaturalization Section. Attached please find the following documents in support of my application:

- Cover Letter
- Resume
- Statements Addressing Mandatory Technical Qualifications
- Statements Addressing Senior Executive Service ECQs

I am happy to provide additional information or documents upon request.

Respectfully,
Tim Belsan

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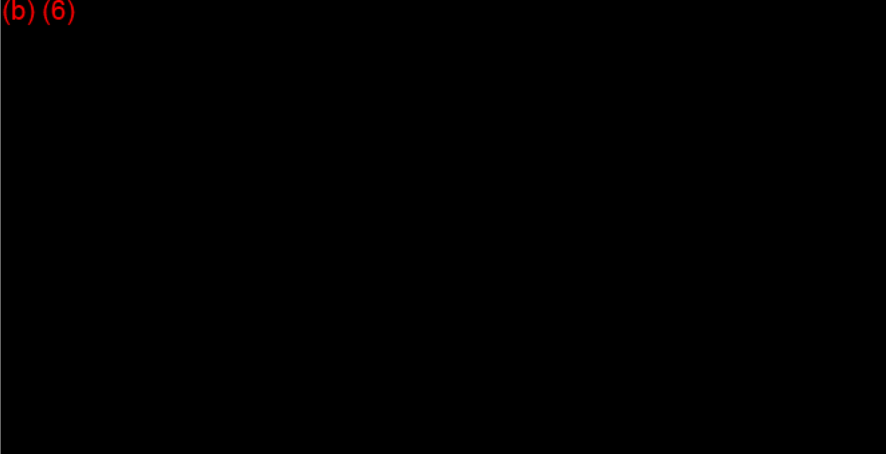
From: Perkins, Paul R. (CIV) (b) (6)

Sent: Wednesday, May 20, 2020 1:23 PM

To: Hunt, Jody (CIV) (b) (6)

Subject: OIL-Denaturalization Section Interview Schedule

(b) (6)



Thursday

4:15-4:35

Tim Belsan

(b) (6)

Host PIN: (b) (6)

Host access code: (b) (6)

(b) (6)

