UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

GLOBAL NURSE FORCE, et. al., Plaintiffs, v. DONALD J. TRUMP, President of the United States, et al., Defendants.	Case No. 4:25-cv-8454-HSG **DECLARATION**

I, Cara M. Selby, pursuant to 28 U.S.C. § 1746, declare the following:

1. I am employed by the U.S. Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS), as the Acting Associate Director of the USCIS Service Center Operations directorate. My current duties include managing multiple Service Centers that are responsible for the adjudication of various immigration benefit requests, including H-1B petitions.

2. I have reviewed data pertaining to the number of H-1B petitions (not subject to the cap) filed with USCIS that included, or were supplemented by, evidence of the $100,000 Proclamation payment, as well as data pertaining to fees received by USCIS with all H-1B petitions (not subject to the cap).

3. As of February 15, 2026, USCIS has received evidence of 85 settled payments of the $100,000 Proclamation payment resulting in $8.5 million in payments.

4. Between September 21, 2024, through February 15, 2025, USCIS received approximately 123,924 H-1B petitions (not subject to the H-1B cap) and collected approximately $524.9 million in various filing, statutory and premium processing fees.

5. Between September 21, 2025, through February 15, 2026, USCIS received approximately 105,611 H-1B petitions (not subject to the H-1B cap) and collected approximately $443.4 million in various filing, statutory and premium processing fees, including approximately $8.5 million in payments required by the Proclamation.

6. H-1B petitions (not subject to the H-1B cap) requesting consulate notification for aliens who are outside of the United States or, if present in the United States, will seek admission as an H-1B nonimmigrant from outside the United States, declined by approximately 87 percent based on a comparison of H-1B petitions (not subject to the H-1B cap) requesting consulate notification filed between September 21, 2024, through February 15, 2025, and September 21, 2025, through February 15, 2026.

7. The decline in the number of H-1B petitions (not subject to the cap) requesting consulate notification between September 21, 2024, through February 15, 2025, as compared to September 21, 2025, through February 15, 2026, represented a decline of approximately $28 million in fees collected by USCIS, far greater than the $8.5 million in Proclamation payments collected between September 21, 2025, through February 15, 2026.

8. I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

9. Executed at the USCIS Northeast Regional Office, South Burlington, Vermont on this 5th day of March 2026.

CARA M SELBY Digitally signed by CARA M SELBY Date: 2026.03.05 12:22:35 -05'00'

Cara M. Selby
Acting Associate Director
USCIS Service Center Operations