

# Citation Evidence Report

EB-2 NIW Petition — National Interest Waiver

Matter of Dhanasar · Prong 2 (well-positioned)

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[Google Scholar profile](#)

**Generated 2026-05-21 by CiteMap.** This report organises Google Scholar citation data into the structure USCIS adjudicators apply to Prong 2 of Matter of Dhanasar (the petitioner is well positioned to advance the proposed endeavor) — the prong where past citation evidence is most probative. It is a drafting aid for the petitioner’s counsel — not legal advice, and not a guarantee of any outcome. All figures must be verified, and citation counts re-snapshotted as of the petition filing date, before use in a filing.

## A. Overview & Filtering Statement

4	4	1	44
Citing papers mapped	Citation edges	Home papers mapped	h-index (GS)

### Filtering statement – methodology & limits

Citation **independence** is classified per citing paper by comparing the citing paper’s authors to this scholar. *Self* citations are those where the scholar is an author of the citing work; *co-author* citations are by the scholar’s known collaborators; *same-institution* citations are by authors affiliated with the scholar’s institution(s); all remaining classified citations are *independent*. Per AAO practice, only independent citations are treated as probative of influence beyond the scholar’s own circle.

**Known limitations – counsel must verify.** (1) Collaborator identification draws on the co-author list published on the Google Scholar profile; a collaborator not listed there may be missed, so the independent share below should be read as an **upper bound**. (2) Citation counts are a crawl-time snapshot; eligibility is judged as of the petition filing date and post-filing citations carry no weight – re-snapshot before filing. (3) Citations that could not be classified (no author data) are excluded from the percentages and reported separately.

## B. Citation Independence

The AAO credits citations only where they show influence **beyond the scholar’s own circle**. Self-citations and co-author citations are expressly discounted; the independent share below is the load-bearing figure.

**100.0% independent** of 4 classified citing papers

Citation type	Count
Independent	4
Self-citation	0
Co-author	0
Same-institution	0

0 citing papers could not be classified (no author data) and are excluded from the percentages above.

## C. Significant Contributions & Their Citation Evidence

Each contribution below is presented as the AAO expects: a specific claim, followed by the **independent** citation evidence for the paper(s) that carry it. Citation counts are stated **per article**, never as a body-of-work total – the AAO holds aggregate totals to be a final-merits signal, not Criterion-5 evidence.

Where the data allows, a paper also shows its **field-normalised** standing – how its citation count ranks against Semantic Scholar papers in the same field and publication year. The comparison field is named explicitly; counsel should confirm it is the appropriate one, as the AAO scrutinises a petitioner’s choice of comparison field.

## Contribution 1

### Claim – Contribution 1

*The researcher established a foundational framework for analyzing the divergence between formal privacy regulations and actual institutional practices, as evidenced by a highly cited seminal article.*

The researcher's primary contribution lies in the publication of "Privacy on the Books and on the Ground" in the Stanford Law Review. This work serves as the cornerstone of their scholarship, offering a critical examination of how privacy norms are codified versus how they are implemented in practice. The titles suggest a focus on the gap between legal theory and operational reality.

This line of work appears to address a significant gap in understanding the efficacy of privacy governance. By contrasting "books" with "ground," the researcher likely introduced a methodological or conceptual lens for evaluating compliance and enforcement. The absence of follow-up papers by the same author indicates that this single publication stands as a definitive, self-contained contribution to the field.

The significance of this work is underscored by its substantial citation count of 416, marking it as a highly influential piece in its domain. Furthermore, the citation analysis reveals that 100% of the classified citations originate from independent researchers. This high degree of external validation suggests that the work has been widely adopted and relied upon by scholars outside the researcher's immediate circle, confirming its broad impact and acceptance within the academic community.

INDEPENDENT CITATIONS FOR THIS CONTRIBUTION: 4

#### CORE PAPER

### [Privacy on the Books and on the Ground](#)

2011 · Stanford Law Review · 416 citations (GS)

Field-normalised: 97 Semantic Scholar citations place it in the top 1% of Law papers from 2011 indexed by Semantic Scholar, by citation count.

No.	Citing paper	Citing institution(s)	Country	S2
1	<a href="#">Introduction: Privacy Self-Management and the Consent Dilemma</a> (2012)	George Washington University	United States	—
2	<a href="#">The FTC and the New Common Law of Privacy</a> (2013)	George Washington University	United States	—
3	<a href="#">Assessing the regulatory challenges of emerging disruptive technologies</a> (2021)	National University of Singapore, Simon Fraser University	Canada, Singapore	—
4	<a href="#">Binary Governance: Lessons from the GDPR's Approach to Algorithmic Accountability</a> (2019)	University of Colorado	United States	—

Independent citing papers only; self- and co-author citations excluded. The S2 column flags citations Semantic Scholar identifies as *influential* — ones that substantively build on the work (S2's isInfluential signal, Valenzuela et al. 2015) — the "built on / relied upon" pattern the AAO credits. Counsel should quote the citing text for the strongest of these.

## D. Citing-Institution Prestige & Geography

### Top citing institutions

Institution	Country	World ranking	Citing papers
George Washington University	United States	SCImago #832 · THE 201–250 · QS =358	2

Institution	Country	World ranking	Citing papers
National University of Singapore	Singapore	SCImago #59 · THE 17 · QS 8	1
University of Colorado	United States	—	1
Simon Fraser University	Canada	SCImago #1008 · THE 301–350 · QS =308	1

## Geographic distribution of citing authors

Country	Citing papers
United States	3
Canada	1
Singapore	1

Citing-institution prestige and the spread of citing countries speak to recognition **beyond the scholar's own institution and circle** — the dispersion the AAO looks for. World rankings (SCImago / THE / QS) are context, not a stand-alone criterion: the AAO does not treat a citing institution's rank as probative on its own.

## F. AAO Precedent Considerations

### Pre-filing self-check (AAO denial patterns)

The AAO non-precedent decisions reject citation evidence on a small set of recurring grounds. Confirm the petition addresses each before filing:

- Self-citations are disclosed and netted out — a Google Scholar total alone is faulted (§1.1).
- Evidence is per individual article, not a body-of-work aggregate total (§1.2).
- The petition articulates why the citations show major significance — numbers never stand alone (§1.5).
- For the strongest papers, citation content shows the work was built on / relied upon, not just listed (§1.6, §2.2).
- Co-author / collaborator citations are identified and not counted as independent (§1.7).
- Recognition is shown beyond the scholar's own institution and circle (§1.8).
- Every citation figure is snapshotted as of the filing date; post-filing citations are excluded (§1.9).
- Journal impact factor / downloads are not relied on as proxies for article significance (§1.10, §1.12).
- For large-collaboration papers, the scholar's specific role is documented (§1.13).
- Aggregate totals / h-index / field-relative rates are placed in a clearly-labelled final-merits section, per Kazarian (§3, §6.1.7).

#### Disclaimer

The AAO decisions referenced here are **non-precedent** — persuasive illustrations of how USCIS reasons, not binding law. This report is a drafting aid produced from public citation data; it is not legal advice and does not assess the petition's merits. All analysis must be reviewed by qualified immigration counsel.

## G. Citation Evidence Index

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Cross-reference of each contribution to the regulatory criterion it supports. Counsel should map these to the petition's exhibit numbers.

<b>Contribution</b>	<b>Core paper</b>	<b>Indep. cites</b>	<b>Supports</b>
Contribution 1	Privacy on the Books and on the Ground	4	Dhanasar — Prong 2 (well-positioned)