

3 Q And on page number 10795, do you see the
4 paragraph in the lower right headed by the phrase
5 "CATEGORIES OF RECORDS IN THE SYSTEM"?

6 A Yes.

7 Q Is this where we would be able to find
8 whether the VIS -- let me back up, try that question
9 again.

10 Is this section of the SORN where we would
11 learn whether SAVE verification includes seeing the
12 person's Certificate of Naturalization number?

13 A Whether SAVE includes the data field of
14 Certificate of Naturalization Number. Let me -- it
15 appears so, yes.

16 Q And do you see in that paragraph A, which
17 starts with the phrase "Data originating from the
18 USCIS Central Index System," do you see there in
19 that paragraph whether it says anything about the
20 Certificate of Naturalization?

21 (Witness reviewed the document.)

22 A Not yet. I'm still reading.

0032

1 (Witness reviewed the document.)

2 I do not see it included.

3 Q If you look a little bit further down in
4 this column and over onto the next page, you will
5 see a paragraph D, which talks about data
6 originating from CLAIMS 4.

7 A Yes, I see that.

8 Q Do you see that there?

9 A Yes.

10 Q Do you see in that section anything
11 related to the number of the Certificate of
12 Naturalization?

13 A No, I do not.

14 Q Is it correct, then, to say that
15 currently, the SAVE system does not allow you to
16 see, or does not pull up information about the
17 number of the Certificate of Naturalization for a
18 naturalized citizen?

19 A Yes.

20 Q Thank you. Here's my question for you.
21 In this exhibit, which is Exhibit 8, talking
22 about -- does Exhibit 8 talk about VIS generally for

0033

1 both SAVE and E-verify?

2 A Yes.

3 Q So when this document, Exhibit 8, refers
4 to CLAIMS 4 information, that would be something
5 that's going to be featured in E-verify after May 5;
6 is that right?

7 (Witness reviewed the document.)

8 A I don't yet see in this document anywhere
9 where that is pieced out. I see a description of
10 what's in the VIS. I don't see, at least in this
11 section, "CATEGORIES OF RECORDS IN THE SYSTEM" that
12 we're talking about, where it goes on to describe
13 whether E-verify and/or SAVE specifically would
14 access a particular data field.

15 Q Do you notice in paragraph A, again in
16 that section where it talks about data originating
17 from the Central Index System, there's lots of
18 information here about employment authorization,
19 such as the date the employment authorization

20 decision issued. Do you see that there?

21 A Yes.

22 Q Is that kind of thing available in SAVE?

0034

1 A There is information in SAVE about work
2 authorization status that is relevant for some, but
3 not all, SAVE users' purposes.

4 Q Is that because it's relevant to the
5 verification of qualified alien under PRWORA for
6 public benefits?

7 A I don't know.
8 (Deposition Exhibit 9 identified.)

9 BY MS. PERALES:

10 Q I'm handing you what has been marked
11 Deposition Exhibit 9. Can you tell me if you can
12 identify that document?

13 A This is entitled "G-845s, Document
14 Verification Request." It's a USCIS form.

15 Q Do you know what its use is?

16 A It is used by agencies to verify
17 information about certain noncitizens and
18 naturalized citizens who are applying for a benefit
19 as defined and applicable in the context of that
20 user. It is not used in every instance.
21 Different users use it at a different
22 stage of the process.

0035

1 Q when you say "users," do you mean SAVE
2 users?

3 A Yes.

4 Q Is this a document used within the SAVE
5 program?

6 A Yes.

7 Q And it says "SAVE" across the top, doesn't
8 it?

9 (Laughter.)
10 THE WITNESS: There's a clue.

11 BY MS. PERALES:

12 Q Yes. Just checking.
13 Can you find the place on this form where
14 CIS responds, confirming that somebody is
15 naturalized?

16 A It's tiny font, but I will try.
17 (Witness reviewed the document.)
18 I don't see any category -- or category is
19 the wrong word, in the response section, section B.
20 I don't see any possible printed response that would
21 say naturalized citizen.

22 Q And is that because the document

0036

1 verification request in SAVE is used for the purpose
2 of figuring out whether noncitizens who present
3 certain kinds of documents are available for these
4 benefits?

5 A Typically, yes.

6 Q Okay. You had mentioned earlier that in
7 order to be a user of SAVE or a participant in SAVE,
8 an agency has to have an MOU.

9 A Yes.

10 Q Can you tell me what MOU stands for?

11 A Memorandum of understanding.

12 Q And is it a legal requirement that a SAVE
13 user have a memorandum of understanding?

14 A It is required by our program before
15 granting access to the system, yes.
16 Q And why do you require an MOU for users?
17 A The MOU spells out our duties, what we
18 will do, and the users' duties and responsibilities,
19 what they will do, so that it is clear how -- you
20 know, as a condition of granting them access to the
21 SAVE system, to have documented the proper use of
22 the system.

0037

1 Q And is it true that the SAVE system
2 contains personal private information?
3 A Yes.
4 Q And does the MOU serve to protect from the
5 misuse or the improper sharing of this private
6 information?
7 A That's a part of it, yes.
8 Q And do you know, with respect to the
9 Arizona county recorders, whether you have MOUs with
10 separate counties or whether you just have one big
11 MOU?
12 A Separate MOUs with each county.
13 Q So if a county wanted to use the SAVE
14 program, that county would have to enter into an MOU
15 with USCIS?
16 A Yes.
17 Q And would it be a violation of your rules
18 if a county used SAVE without an MOU?
19 A Yes.
20 Q Do federal agencies other than USCIS use
21 SAVE?
22 A Yes.

0038

1 Q Give me an example.
2 A Well, one of the biggest is the Social
3 Security Administration. They use SAVE for people,
4 noncitizens, applying for a Social Security number.
5 That's benefit, as they use that word, for their
6 program.
7 Also, if someone is applying for SSI, they
8 would use it. Office of Personnel Management uses
9 it in background investigation processes.
10 Exhibit 6 includes all of them. I'm just
11 looking to see if there's any particularly
12 interesting. But SSA is the largest.
13 Transportation Security Administration,
14 this is a DSA agency, uses it for certain licenses
15 like the TWIC program for hazardous material
16 driver's licenses.
17 Q With respect to Exhibit 8, which is the
18 SORN, is there another document that would set out
19 for me the immigration-related -- the
20 immigration-related information that is just
21 accessed by SAVE?
22 A At the top of my head, I'm not sure. I'm

0039

1 actually thinking it's likely listed in the web
2 pages that we were looking at a minute ago.
3 Q We found -- you know, we found some
4 documents related to VIS, including your SORN, but
5 now I think it's dawned on me that the descriptions
6 of VIS can include information that's accessed by
7 E-verify and not necessarily SAVE.

8 And the documents we have for SAVE that
9 are on the web I'm not sure set out the information
10 that SAVE accesses related to immigration.

11 So I'm just wondering if you can think of
12 any other document.

13 A I mean, certainly, we have internal
14 documents that describe every last detail of the
15 entire system in public presentations and PowerPoint
16 slides, we -- I mean, it's three databases. You
17 know, it's CIS, CLAIMS 3 and IBIS. So I can't think
18 at this moment of a discrete document that I would
19 say, oh, I know that sentence is in there. But it
20 is such a public fact that I'm sure it's in many
21 documents that I just can't specifically name at
22 this moment.

0040

1 Q How about if I leave a little space in the
2 deposition, and if, when you go back to your office
3 or if before you sign your deposition, you can refer
4 us or include something that lists the information
5 that SAVE uses, you know, for that SAVE draws upon
6 that relates on to immigration and naturalization?

7 A Sure, that's fine with me.

8 MR. GREGORY: Yeah. If there's any public
9 document, we'd be happy to point you to what -- you
10 know, get you a copy or tell you where you can
11 access it.

12 MS. PERALES: Thanks.

13 THE WITNESS: Yeah.

14 BY MS. PERALES:

15 Q Some of the nitty-gritty on the case, as
16 you can tell, has to do with SAVE and the kind of
17 information that might be accessible, particularly
18 with respect to naturalization, like, you know, is
19 there a certificate number in there that SAVE can
20 reach to, or can SAVE reach to the date of
21 naturalization or not, is it just a part of the
22 Central Index System that's not fed into SAVE. So

0041

1 we're particularly interested in the scope of SAVE's
2 access to data related to naturalization in
3 particular.

4 MR. GREGORY: Yeah, I mean, I think if we
5 can find -- we certainly want to present a clear
6 picture.

7 THE WITNESS: Yeah, absolutely.

8 MR. GREGORY: As we find something, I'll
9 be happy to share that with you.

10 THE WITNESS: Although I'm telling you
11 under oath that it's those three databases, but
12 definitely there's going to be documents also that
13 you can --

14 BY MS. PERALES:

15 Q However, we've also established that SAVE
16 doesn't access every piece of information in the
17 Central Index System.

18 A Correct.

19 Q All right. I --

20 A Correct.

21 Q I know Mr. Quinn educated us a great deal
22 about all of the information that's in CIS, the

0042

1 Central Index System. But it's my understanding

2 that SAVE, for its particular purposes, may only be
3 reaching for some information from the Central Index
4 System.

5 A Right.

6 Q Okay. Is it correct to say that in a
7 web-1 verification request, that a SAVE user would
8 see information showing whether an immigrant is
9 naturalized or not?

10 A I'm sorry, I got lost in the question. In
11 web-1 --

12 Q Yes. Is a SAVE user able to see
13 information showing whether an immigrant is
14 naturalized or not?

15 A Yes. And I did bring screenshots of the
16 actual web pages to walk you through, if that's of
17 interest.

18 Q Oh, yes. I'm excited to do that with you,
19 but I want to ask you a couple of questions before
20 that.

21 When SAVE is showing whether an immigrant
22 is naturalized or not, do you know where that

0043
1 particular information is coming from?

2 A Central index.

3 Q Can you walk me through the steps that a
4 SAVE user would perform to do a verification like
5 the kind of verification that's done by county
6 recorders in Arizona?

7 A Yes, and I would most easily and
8 efficiently for you do that by showing -- walking
9 you through the web pages.

10 Q Let's do that.

11 A I only brought one copy because I thought
12 since it's so many pages, you might feel more
13 comfortable copying it here to ensure everyone got
14 the same pages. So --

15 Q Can we mark this first?

16 A Yes.

17 (Deposition Exhibit 10 identified.)

18 BY MS. PERALES:

19 Q I'm handing you what has been marked
20 Deposition Exhibit Number 10. Can you identify the
21 document for me?

22 A These are screenshots of the actual web
0044
1 pages from the web-1 SAVE access method.

2 Q Is that method used by Arizona county
3 recorders to verify citizenship?

4 A Yes.

5 Q Okay. Can you walk me through it now?
6 And tell me also, kind of in a narrative way, how a
7 user gets in and does it.

8 A Does it?

9 Q Yes.

10 A The first page of the -- this is
11 essentially a PowerPoint-type presentation. This is
12 what it's -- these web pages are pasted into.

13 So the first page -- and you'll see
14 there's a number 2, and you will wonder where is
15 number 1. Number 1 was just a cover sheet that my
16 staff put on there, and I was like I don't need a
17 cover sheet. So there's no missing page, just later
18 when you're copying, you don't think we dropped off

19 a page, it was a cover sheet.
20 So page -- first page, which does have a
21 page 2 on it, is called "Initial Log-in Screen."
22 So the user who is ready to perform a

0045
1 query would literally have to put in their user ID
2 and password. This is unique to the person. If
3 someone shares their ID or password with someone
4 else to allow them to use it, that's a violation of
5 the MOU.
6 So they log into the system from this
7 screen. The next screen they will see is just the
8 general user home page. It says welcome to the SAVE
9 program's VIS. And then they would -- they want to
10 do a query, so they're going to go to -- there's a
11 menu on the left, and one choice is "Initial
12 Verification." So they're going to go into that
13 choice.

14 Q Let me stop you there. Are all of those
15 choices available for a web-1 level user?

16 A Yes.

17 Q So somebody like a county recorder in
18 Arizona would select that first option, "Initial
19 Verification"?

20 A Yes.

21 Q Is that what it's called?

22 A Yes.

0046
1 Q Okay. Thank you.
2 A Then the next screen they would get is
3 called initial verification data input. The web-1
4 access method is a query by alien number, or
5 A-number, known as A-number.

6 So they would fill in the data field with
7 the person's A-number, and then there's a
8 benefits -- benefits screen where some agency users,
9 like SSA, might be verifying for SSN or SSI. So in
10 that case, they would choose which of their benefits
11 they are pursuing in this case.

12 For the registrar's voter registration
13 purpose, I'm not sure if this is blank or if it
14 always selects voting registration. I just don't
15 know. But for users who have choices, they would
16 make that selection.

17 Q So it's a selection from a menu as opposed
18 to kind of a freestyle write your own thing?

19 A Correct, correct. So it's possible this
20 is blank for the Arizona counties we're talking
21 about. I'm just actually not sure. They wouldn't
22 get other agencies' choices. They only get their

0047
1 own choices, if any. So they wouldn't see driver's
2 license, employment.

3 So then they hit "Submit Initial
4 verification" button. If there is an error that
5 looks like, you know, what we call fat finger, an
6 innocent typo, just to try to avoid going down a
7 mismatch path when it was just a typo, we do a check
8 and come back to the person to say, you know, there
9 seems to be a problem, you know, you didn't put any
10 A-number at all, the field is blank, so it can come
11 back and say you had an error.

12 Q would that also happen if you entered an

13 insufficient number of digits for the A-number?

14 A It should. It should. I don't know that
15 absolutely.

16 So this wouldn't pop up in every case
17 because it's not going to apply.

18 Then this is actually an example of seeing
19 a system response that someone is a U.S. citizen.

20 Q Does that page have a number on it within
21 this exhibit?

22 A It doesn't, because it was something I

0048

1 asked for after this was created. I said I'd like
2 to see what it -- you forgot to give me what it
3 looks like when someone is a citizen, and that's an
4 important element for my purpose. So it was just
5 one page I inserted, in between page -- the pages
6 that are numbered 5 and 7, because there used to be
7 a permanent resident example, which seemed less
8 useful than a U.S. citizen example.

9 Q I'm going to hand you the pen. Can you
10 put the little 6 in the corner for that page?

11 A Yes, putting the 6 in the corner.

12 Q Perfect. All right. So we're discussing
13 page 6. You said it was a screen for confirmation
14 for somebody who is a U.S. citizen.

15 A Right. So it's the web-1 access method
16 that returned a response United States citizen.

17 You can see that there's some data fields
18 that are blank because they're not relevant for this
19 user, like EAD expiration date, you know. In some
20 context, you would want to know that for other
21 benefits, if you were talking about that. For this
22 context, it's not relevant.

0049

1 It shows Class of Admission. COA is Class
2 of Admission, USC, date of birth is filled in, the
3 person's name, their country of nationality.

4 Q And it wouldn't include the person's
5 original country?

6 A This does not. This does not. Central
7 Index certainly does, but for this purpose, it's not
8 relevant.

9 It's a query by A-number, and then the
10 page will show you who is the actual user and the
11 date the query was run. So you can see this was
12 just run this week, for me, you know.

13 Then on the page marked 7, if there is
14 some nondefinitive response or match, this system
15 response will be "INSTITUTE ADDITIONAL
16 VERIFICATION."

17 So the system could come back
18 definitively, just like this U.S. citizen response,
19 and say permanent resident, some other class of
20 admission, nonimmigrant class, it could do that and
21 be like this is our definitive response according to
22 this A-number, you know.

0050

1 And then the voting registration user
2 would look at this to determine, okay, this same
3 number that I inputted is a U.S. citizen, I didn't
4 input the name on the first screen, I only inputted
5 the A-number, so now they're going to check to see
6 is this the person -- the name I'm expecting.

7 If it is, this is our complete response.
8 If the voter registration user says, oh, wait a
9 minute, my application was Gerri Ratliff, this says
10 Saliba Crumb, so this -- the person with this
11 A-number is a citizen, but I was expecting a
12 different name, there's some mismatch, which the
13 system doesn't know there's a mismatch because they
14 were only pulling by A-number.
15 So then the user can go to what we call
16 secondary verification, and that button is called
17 "Request Additional Verification," which I'll show
18 you. Or if this is the name they were expecting,
19 they're done, they have no further questions, then
20 they would hit the button "Complete and Close Case."
21 So if -- however, instead of a definitive
22 response, if the system -- there's some problem, you

0051
1 know, this is not this case, but maybe that A-number
2 doesn't even exist in Central Index, Or based on --
3 this is not the best example for the voting
4 registration user, because this is someone who --
5 why would the system automatically think additional
6 verification was needed? This is a person who is --
7 they're a B-2, somehow -- I don't know. This is a
8 background investigation. This is not the best
9 example for you.

10 But the system can say I think further
11 digging is needed based on the logic behind it. So
12 that's what this sample is, that the system -- that
13 the best example I could think of for the voting
14 registration issue would be the A-number didn't even
15 exist. It would say need more information to figure
16 this out.

17 Q Or let me ask you this. If the user put
18 in a Certificate of Naturalization Number.

19 A Well, that's not possible.

20 Q Would it --

21 A Because we don't have a data field. By
22 mistake?

0052
1 Q Yes. If the user entered the nat
2 certificate number instead of the A-number into the
3 A-number field, what would happen?

4 A Well, if it -- I don't know how many
5 digits the nat certificate number is. If it's the
6 same number of digits as an A-number, eight or nine,
7 it would either pull up some coincidental person who
8 had that A-number that matches that other person's
9 certificate number, but it would pull up a different
10 name.

11 And then the voter registration user
12 would -- should see that and then hit "Request
13 Additional Verification," something is wrong here,
14 or if they notice their mistake, they could just
15 close out the case and start over.

16 Q When you go in the initial entering of the
17 A-number in the web-1, do you have to include the
18 letter A or do you just start with the number?

19 A It's just the number, yeah.

20 Q So you might get a request for additional
21 verification from the system if you entered a
22 nonexistent A-number, or if the user transposed some

0053

1 of the numbers within a valid A-number and then it
2 couldn't find a match?

3 A Right, exactly, and it didn't match
4 someone else's A-number coincidentally, then it
5 would say we need -- you know, the system would say,
6 basically, please give me more information, I can't
7 definitively answer you.

8 And then the user could follow through and
9 push this button that's called "Request Additional
10 Verification." They could, in theory, go I don't
11 want to do that, complete and close the case.

12 So in my walking you through all the
13 possibilities, the user does hit this button,
14 request additional verification.

15 Then they get a screen that asks for more
16 information, like the quick search didn't do it,
17 give me more and we'll figure this out.

18 So, again, this is a background
19 investigation example, but you can see the data
20 fields that will pop up. So now you're able to put
21 the person's name in, an alias, I-94 number, date of
22 birth, document type that if it's a case where --

0054

1 this isn't in every case, but where the benefit
2 applicant has had to show a document or give a copy
3 of a document, what was that.

4 Document expiration date, special
5 comments. So in other words, giving us a lot of
6 information about this person.

7 Hit "Submit Additional Verification," and
8 then the user will see the next screen will say "DHS
9 Verification in Process," meaning you've just got to
10 wait until we get back to you, we've got to search
11 around.

12 Q At that point, does it turn into a manual
13 task by CIS to try to verify?

14 A Yes.

15 Q This goes to a human being?

16 A Yes, yes. Yes.

17 Then when -- those staff are called status
18 verifiers, and when they have completed their
19 research, they will through the system send a
20 response back to that user with the end of the
21 story, essentially, with the information that they
22 found.

0055

1 Or if they were not able to come to a
2 definitive conclusion, they can try to send this to
3 a third step, where they come back and say resubmit
4 document, which this then means -- and in this case,
5 there's no reason that -- you haven't even submitted
6 a document yet, but it's basically saying I need to
7 see the actual document, I still need more clues.

8 And that is the manual G-845 stage, where
9 this user would print that out, attach copies of
10 whatever documents were -- had been provided by the
11 noncitizen or the -- or if they're a naturalized
12 citizen, and then mail it in. It says to the
13 appropriate DHS office because we divvy up the work,
14 so it doesn't just go to one office who then has to
15 farm it out. We sort of say okay, Arizona, you're
16 all going to mail your work here and they're going
17 to do your work, or now we're moving you over here

18 because we hired more people here, just trying to
19 keep it moving more quickly.

20 Q How many status verifiers do you have?

21 A We have around 100. That's not -- it's
22 not exactly 100, but to give you the ballpark, it's

0056
1 around 100.

2 Q If you wanted to do a web-1 verification
3 on somebody for whom you did not have an A-number,
4 could you, for example, put in a few zeros and hit
5 submit and get prompted to go to that next level and
6 fill out the name of the person and some of that
7 other information so that you could get to a human
8 being who would try to help you out with the
9 verification?

10 A You can -- you can force a secondary. I
11 don't actually right now exactly know if putting in
12 three zeros would do it, but I know there is a step
13 where you can get to secondary if you feel that you
14 need to.

15 Q Okay. Do you know the extent to which
16 people in the Arizona county recorders' offices
17 force secondaries?

18 A I don't. The system could show that
19 activity, but I don't know that information in my
20 head today.

21 Q Maybe we could leave a little blank for
22 that information, if you happen to come across it.

0057
1 A Sure.

2 Q Does the verifier, the human being who
3 works at that secondary level, have access to the
4 full Central Index System?

5 A Yes. They have access, even, to the paper
6 file if they need it.

7 Q They could request it if it was in another
8 location?

9 A Uh-huh, uh-huh.

10 Q Do you know how long it takes, typically,
11 for a secondary verification to occur?

12 A It depends on the access method. So
13 assuming you're most interested in web-1, and I can
14 get you that information, it is typically a few
15 days. I mean, we track it, and I could give you a
16 more exact number. But --

17 Q Okay. Now, the web user -- or the SAVE
18 user would have to go -- well, let's just say that
19 the request is sent to secondary verification. Does
20 the web user of SAVE get an e-mail back when that's
21 complete, saying, hey, we've got an answer for you,
22 or does the SAVE user have to log back in to web-1

0058
1 to check and see?

2 A It's through the SAVE system. So the user
3 has to log back in, and then they will be able to --
4 for example, under "View Cases," If they go into
5 view cases, they can see all of their cases and the
6 status. And they would be able to see there's an
7 update.

8 Q If a user would like to use SAVE, is there
9 a charge associated with having -- being able to use
10 web-1?

11 A Yes.

12 Q How much is it?
13 A Currently, it is approximately -- it's by
14 the query. It's approximately 26 cents for a query
15 that resolves instantly, meaning doesn't have to go
16 to the additional verification step. And it is
17 approximately another 26 cents, in that ballpark,
18 for a query that has to go to a secondary step.
19 Q Does it ever become more expensive than
20 that on a particular verification?
21 A No. And the fees are going up October 1,
22 but not by much. I think a query that resolves on
0059
1 primary, that first step, is going up to 50 cents
2 and a query that will need to also go to secondary I
3 think is going up to a total of a dollar, roughly.
4 So it -- the fees recoup the system costs,
5 not the full program costs.
6 Q Certainly not the people power it takes
7 to --
8 A Right.
9 Q -- look and do a secondary?
10 A Right, right.
11 Q If I decided it was too expensive to
12 become a SAVE user or to use web-based SAVE
13 application, could I send you a paper request for
14 verification?
15 A Some agencies don't use the SAVE system,
16 they only submit the paper G-845 to us. That is
17 currently free.
18 On October 1, we will begin charging for
19 that and, therefore, we will have to enter into MOUs
20 with those users to then establish the basis for
21 charging them.
22 Q So if somebody is going to ask for a
0060
1 verification in SAVE through the submission of a
2 form, it would have to be the G-845, there is no
3 other form out there that you would use?
4 A Correct.
5 Q Does anybody in the SAVE program perform
6 updating of alien records?
7 A In the past, status verifiers or at least
8 certain or many status verifiers, had the ability to
9 directly update information in CIS. I am not 100
10 percent sure if any of the status verifiers who are
11 currently working on secondary verifications
12 continue to do that. That actually was something I
13 asked my program yesterday.
14 We do not and we have never had the
15 ability to directly update the IBIS information,
16 since that's owned by CVP.
17 Q Do your status verifiers do secondary
18 verification on both SAVE and E-verify requests?
19 A The group of people in the branch, the
20 status verification operations branch, there are,
21 like, 100 or more status verifiers who could do
22 either SAVE or E-verify. Right now, there's about
0061
1 seven of the status verifiers who only do E-verify
2 secondaries, just for efficiencies, that's done in
3 Los Angeles, in that office, and the others do SAVE.
4 They're typically assigned just to certain users
5 and -- but there is fluidity if the E-verify work

6 went up and SAVE went down, we could reassign.
7 Because they are essentially doing the same types of
8 activities, whether for SAVE or E-verify, because
9 the E-verify -- our E-verify status verifiers are
10 only verifying noncitizen status, they're not doing
11 SSA's secondaries. SSA does that, in terms of U.S.
12 citizenship and SSN.

13 Q So, for example, you might have to add to
14 your staff if a state passes a law saying all of
15 their employers have to participate in E-verify,
16 you'd have to pick up some people?

17 A Well, the DHS mismatch rate over
18 noncitizen status in E-verify is very low. It's
19 only .5 percent of all queries. It's trending
20 downward. So the program would have to grow a lot
21 before we had an issue. And we're continually
22 hiring anyway. We're in a growth mode anyway.

0062

1 Q That's good. Do you know how long it
2 takes between the time a person takes the oath of
3 citizenship in Phoenix and when the SAVE system
4 would send a confirmation to a Web-I user showing
5 citizenship?

6 A There's two pieces of that. I don't know
7 how long it takes our domestic operations
8 directorate that -- I'm in NSRV, and they're the
9 directorate where the person is naturalized. Their
10 staff would update CLAIMS 4 about, yes,
11 naturalization completed. CLAIMS 4 updates Central
12 Index.

13 I don't know how much time that takes. I
14 do know that the second half of it, which is once
15 Central Index has the information that the person is
16 naturalized, we get nightly uploads, so we would
17 know the next day.

18 Q So you know that SAVE would reflect
19 somebody's U.S. citizenship the day after the
20 Central Index System would know?

21 A Yes, yes.

22 Q But you don't know how long it takes

0063

1 between the time a person takes the oath of
2 citizenship and Central Index System having that
3 information?

4 A Correct.

5 Q Do you know if there are differences in
6 the rate that Central Index System updates for
7 different types of changes in status? Do you know
8 whether it's faster when somebody goes from a
9 conditional resident to a permanent resident for CIS
10 or SAVE to reflect that, versus naturalization?

11 A I don't know. It's a direct function of
12 how quickly the adjudicator who granted that benefit
13 application then completed their task of updating
14 the system about that, which probably varies office
15 to office and adjudicator to adjudicator based on
16 workload.

17 Q Is it also true that after your
18 naturalization is approved, you still have to go
19 through that ceremony of taking the oath and then
20 have that information transmitted --

21 A Yes.

22 Q -- to the adjudicator or to the field

0064

1 office?

2 A Yes. You're not -- you're not naturalized
3 until you've gone through the oath ceremony.

4 Q Did you ever work in a field office?

5 A No.

6 Q Okay. Did you ever have any -- have you
7 ever been an adjudicator?

8 A No.

9 Q I got the chance to talk to Mr. Quinn
10 about that previous part of his professional life.

11 A Yeah.

12 Q But I guess we won't be able to talk about
13 that.

14 The exhibit that we marked with your list
15 of SAVE users, Exhibit 6, is that a complete --
16 would that show all of the SAVE users who are county
17 recorders in Arizona? Is this an updated list?

18 A Yes, this was prepared on April 17 and, to
19 my knowledge, there's been no additional counties
20 granted MOUs since update. And the last four on the
21 list are the Arizona counties' registrar's offices
22 with current SAVE MOUs.

0065

1 Q So on this list, there are four Arizona
2 counties that have these SAVE MOUs; is that right?

3 A Correct. In interest of full disclosure,
4 there are three counties who used to have SAVE MOUs
5 who recently self-terminated and told us they no
6 longer wanted to use SAVE, so they're not reflected
7 there, they have been dropped off.

8 Q Do you have any idea what they're doing
9 now to inquire into citizenship for their
10 applicants?

11 A No, no.

12 Q Do you have any idea what the 11 counties
13 that are not on this list are doing to inquire into
14 citizenship status?

15 A No.

16 Q Does this document contain the dates on
17 which these users became users?

18 A It does not. I think because there's
19 almost 300 users, the person who prepared this
20 didn't have the time to pull all that information.
21 I do have the relevant dates for the Arizona
22 counties.

0066

1 Q Great. Will you share that with us, then?

2 A Yes. It is on a piece of paper that also
3 indicates -- and I wrote this out by hand, I didn't
4 copy it, so -- but of course you're going to, so I
5 don't have one for Peter that shows the dates.

6 Q Wait. Before you start talking about it,
7 let's mark it.

8 (Deposition Exhibit 11 identified.)

9 THE WITNESS: And that's my last handout.

10 BY MS. PERALES:

11 Q There's nothing worse than going back to
12 the deposition and wondering what it was you were
13 discussing at that particular point. I'm going to
14 hand you what has been marked Deposition Exhibit 11.
15 Can you describe the document for me?

16 A This is a handout I brought to the