

17 deposition entitled "Voter Registration" -- excuse
18 me, Arizona Voter Registration, SAVE usage by
19 County.

20 It shows the eight Arizona counties that
21 either -- that have had an MOU with SAVE at some
22 point. It indicates that four of them

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1 self-terminated on March 28 of this year. It shows
2 the query usage -- or the query volume of all the
3 counties from the date they first began running
4 queries through -- it runs through March 25.

5 Q Of?

6 A Of this year. so they're likely -- or
7 there could have been queries run after that date,
8 but that's when this report was prepared.

9 And there is one county, La Paz County,
10 who signed an MOU to use SAVE in 2006 that has run
11 no queries, so this is not an error. It's just that
12 they haven't self-terminated, but they have not run
13 any queries, so they're not in this chart.

14 And I would also tell you that these --
15 because you're going to ask me anyway, these four
16 counties are not listed up here with their query
17 volume because they didn't run any queries.

18 Q You mean they signed up and
19 self-terminated and never ran a query in between?

20 A Correct.

21 Q And that's Yavapai, Navajo, Coconino and
22 Pinal?

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1 A Correct.

2 Q And La Paz also signed up and never used
3 the system for a query?

4 A To date has not used it. They still have
5 an MOU with the SAVE program.

6 Q Thank you. This is great. This is very
7 helpful.

8 You mentioned before that it's a violation
9 of the MOU to allow someone to use your password; is
10 that right?

11 A Yes.

12 Q Is a password issued to a single
13 individual?

14 A Yes.

15 Q Okay. so, for example, an office like the
16 Maricopa County recorders office would not simply
17 get one password?

18 A Correct.

19 Q would Maricopa County have to tell you how
20 many people they wanted to have accounts?

21 A I am not sure of the exact method by which
22 they would communicate with us about the number of

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1 individual users they wanted to have access to the
2 system. That's information we could easily find
3 out.

4 But each -- each individual who runs
5 queries has to have their own user ID and password.

6 Q Do they have to sign any document as an
7 individual user, committing to treat the information
8 according to the rules?

9 A Not to my knowledge. I could find that
10 out definitively, but not to my knowledge.

11 Q And does the MOU itself set out rules
12 against disclosure of the information --
13 A Yes.
14 Q -- to third parties?
15 A Yes.
16 Q You have mentioned earlier about the legal
17 understanding of the term "benefit and license" for
18 the SAVE program. And you had mentioned public
19 benefits and driver's license. And then you said
20 voter registration as a benefit.

21 Can you tell me the legal basis for
22 understanding voter registration to be a benefit or
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1 a license for the purposes of SAVE access?
2 MR. GREGORY: Well, to the extent you're
3 asking her to provide legal opinion, I doubt that
4 she's competent to do that. She's not an attorney
5 with the agency.

6 BY MS. PERALES:
7 Q Do you have access to any written or
8 verbal agency interpretations that help you
9 understand how voter registration is included as a
10 benefit or a license?
11 A Well, by matter of -- by way of process,
12 procedures, if we receive a request from an agency
13 for an MOU that is for a benefit that is not
14 something we would consider run of the mill, that is
15 a case of first impression, we would consult with
16 counsel's office about the -- about whether that
17 request is proper in terms of having the correct
18 legal basis, sort of a generic answer. There is
19 that relationship and process in place.

20 In terms of something specifically about
21 this, in my head right now, I'm not sure if there's
22 anything in writing on that point. I mean, this
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1 certainly was a case of first impression, so I'm
2 sure -- I know we did consult with counsel before
3 entering into the agreement. I'm just not sure in
4 my head right now what documentation surrounds
5 that -- surrounded that consultation.

6 Q Okay. Do you have any other documentation
7 that sets out generally, you know, a guide for you
8 about what is a benefit or a license, other than
9 what we have here in these exhibits?

10 A No, no.

11 Q Do you recall when you received the first
12 request for an MOU from an Arizona county under this
13 law?

14 A I was not personally involved in the
15 program at that time. It was 2005, so --

16 Q were you with the federal government then?

17 A Yes.

18 Q where were you?

19 A 2005, let's see. I was -- was USCIS
20 born --

21 MR. GREGORY: 2005?

22 MS. PEREZ: February of 2003. Sorry.
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1 THE WITNESS: So I was with USCIS. I
2 was -- depending on -- I believe I was in the
3 Domestic Operations Directorate at headquarters,
4 either -- probably in that time working on -- in a

5 division called program and reg development that
6 oversaw reg writing for the agency.

7 BY MS. PERALES:

8 Q Are you aware of any regulations that
9 pertain to the SAVE program that helped further
10 flesh out the concept of license or benefit?

11 A No.

12 Q Do you know if Maricopa County -- I guess
13 we can see right here, Maricopa County was the first
14 county to come into an MOU under this law. March
15 15, 2005; is that right?

16 A Yes.

17 Q Can you describe for me the difference
18 between an alien registration number and the number
19 of a certificate of naturalization?

20 A Well, an A-number is a number that USCIS
21 assigns to a person at certain steps, when they file
22 applications for immigration benefits with us many

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1 years ahead of the stage of filing for
2 naturalization.

3 You keep your A-number with you throughout
4 your relationship with USCIS. When you become
5 naturalized, your certificate -- your naturalization
6 certificate will have a number on it that is
7 separate from your A-number.

8 Q Do you know what the certificate number is
9 for?

10 A It's to track the certificates, which are
11 a secured document, fairly kind of secure document
12 that we track in our offices carefully for antifraud
13 purposes, for inventory control so that they aren't
14 disappearing and being sold, et cetera.

15 Q Are you familiar with any uses of an
16 individual's A-number after she naturalizes?

17 A Well, one example, certainly, is for the
18 Arizona counties running voter registration queries
19 through Web-1, Web-1 -- the primary verification
20 method is only by A-number.

21 Q Are you aware of any other uses of an
22 individual's A-number -- occasions in which an

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1 individual would use her A-number after she
2 naturalizes?

3 A Searching my brain for any specific
4 instances, but generically, if someone is
5 establishing their naturalization status for some
6 purpose, the A-number is a key to doing that if
7 there's going to be a verification against USCIS's
8 records.

9 Q Would it be correct to say that CIS is
10 only authorized to enter into an MOU with an agency
11 that has legal authority to request somebody's
12 A-number?

13 A Well, USCIS's authority to enter into an
14 MOU with an agency that has legal authority to
15 verify that person's status, verification by
16 A-number is the most common way to do that. So I
17 would say yes.

18 Q If an agency told you they wanted to do
19 web-1 verification and everybody understood that
20 that was going to require the use of an A-number for
21 the query, and you learned that that agency did not

22 have legal authorization to request A-numbers from

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1 people, would that affect the process of entering
2 into an MOU?

3 A It's hard to imagine a case where an
4 agency would have legal authority to verify status,
5 yet not have authority to request an A-number, so
6 it's a hypothetical that I'm really not sure would
7 ever exist.

8 Q Can you answer the question if it did
9 exist?

10 A If they didn't have legal authority to
11 enter -- to request someone's A number, there are
12 other ways to verify their immigration status. So I
13 can certainly see a way to enter into an MOU with
14 them to verify status through other identifiers.

15 Q Is there another Web-based verification
16 system in SAVE that would allow you to perform a
17 query without having to use that A-number?

18 A Yes, and you can, even through web-1,
19 through part of the secondary screens, query by I-94
20 number, for example, although people who --
21 that's -- the I-94 number is more commonly used with
22 nonimmigrants who don't have an A-number.

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1 Q Might one never have had an I-94 number?

2 A Correct.

3 Q What would you recommend to an agency that
4 wanted to do some kind of web-based verification
5 with you, or paper-based, and they didn't have
6 A-numbers? What would you tell them?

7 MR. GREGORY: Objection; calls for
8 speculation.

9 BY MS. PERALES:

10 Q I'm trying to get a sense of your process.
11 Do you have alternative programs to offer? I
12 suppose the G- --

13 A 845.

14 Q -- 845 might be one way to do verification
15 without an A-number, although G-845 depends on a
16 document; is that right? Do you have to do a G-845
17 with a document?

18 A I do not believe it is required. I
19 believe an agency could fill out the section A and
20 submit it for verification.

21 Q Do you have any other web-based programs
22 that you could offer for an agency that didn't have

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1 access to A-numbers, other than telling them to
2 force a secondary verification?

3 A Every SAVE -- a SAVE query, in terms of
4 the way it's currently built, has to be done by
5 A-number or I-94 number. There's not another way to
6 do it, in terms of the key identifier.

7 Q So web-2, web-3, these other versions are
8 still going to prompt for the A-number to do the
9 query?

10 A Yes. The difference from web-1 is that
11 they -- for example, web-3 won't query only by
12 A-number, you will also have to fill in some other
13 data fields like name, so it's more of a matching
14 query.

15 Q If somebody's U.S. citizenship was not

16 reflected in the Central Index System, is it correct
17 to say that SAVE also would not show the person to
18 be a U.S. citizen?

19 A On the primary verification through VIS,
20 it could not verify citizenship because it's relying
21 on the citizenship field in CIS.

22 On a secondary or third step, a

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1 G-845-based verification that involves the status
2 verifiers doing their manual search, that search
3 currently includes access to CLAIMS 4, RNACS and
4 ordering the A-file, if necessary, to confirm -- to
5 do the complete search.

6 Q Let's say a minor child becomes a citizen
7 because of the naturalization of a parent but does
8 not apply for a Certificate of Citizenship and the
9 CIS, Central Index System, does not show that person
10 to be a U.S. citizen.

11 Is SAVE going to show the person to be a
12 U.S. citizen?

13 A Probably not.

14 Q And even if the status verifier were to
15 look at CLAIMS 4, what used to be RNACS and this
16 person does not have a Certificate of Citizenship,
17 is the status verifier going to be able to discover
18 the person to be a U.S. citizen?

19 A No.

20 Q I think I asked you this question before,
21 but are you familiar with the method by which
22 information about people being sworn in as citizen

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1 in federal court ceremonies, are you familiar with
2 how that information is communicated back to CIS?

3 A We talked about that a little bit. I
4 don't know the time frames, and it does differ from
5 office to office. But the adjudicator who granted
6 that case after the oath, or a related clerk
7 assistant would put into CLAIMS 4 that the oath had
8 been administered. That information is uploaded
9 into the Central Index.

10 Q Do you know how the information that the
11 oath was administered gets to the adjudicator or the
12 data entry person at the field office?

13 A It is different. It's not the same in
14 every office. Some offices have same-day
15 administrative oaths, so they have a much more --
16 they would have a different process to let the
17 adjudicator know yes, this person did -- stayed for
18 the oath ceremony.

19 Other offices have federal court scheduled
20 out, you then have to wait several months for your
21 judicial naturalization ceremony, and they would
22 have different procedures. But it would certainly

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1 involve confirming that the person did show up for
2 the oath and had no recent events that would
3 disqualify them and then, you know, was administered
4 the oath.

5 Now, whether in some offices that's done
6 paper, tick marks, a database on a laptop, I don't
7 know, and it probably does vary office to office.

8 Q Do you know for the Phoenix and Tucson
9 field offices, whether they do daily administrative

10 oaths?
 11 A I don't know.
 12 Q Have you ever seen or are you familiar
 13 with a form called the N4?
 14 A Hundred? The N400?
 15 Q No, just the N4.
 16 A No. Never heard of it.
 17 Q I don't know if we're going to mark it --
 18 A Oh, the N4. No, just kidding. Oh, this
 19 N4.
 20 Q You're not familiar with the N4?
 21 A Let me look at it. Deep in my brain where
 22 I used to work on naturalization policy issues,

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1 maybe I will remember this form.
 2 (witness reviewed the document.)
 3 I probably have never seen this before.
 4 I -- the N4 form itself, or I might have and don't
 5 have any memory of it. I have in my deep past jobs
 6 through the years been aware that there was a
 7 process where courts would report up their
 8 naturalization activity. So I'm inferring that it's
 9 via this form.
 10 But that is basically all I know about
 11 this topic.

12 Q Thanks. Let's go ahead and mark it since
 13 we talked about it.

14 (Deposition Exhibit 12 identified.)

15 BY MS. PERALES:

16 Q Are you aware whether the naturalization
 17 certificate says that it's a violation of law to
 18 photocopy or duplicate the certificate?

19 A I believe it does say that.

20 Q Do you know where that rule comes from?

21 A I believe it's a statute, I'm not 100
 22 percent sure. I'm aware that that is a rule and

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1 that we've had to clarify that for -- we get asked,
 2 I need to copy it for an official government
 3 purpose, but I'm afraid I'll get in trouble. And
 4 we've determined that, of course, you can copy it
 5 for official government purposes.

6 So I'm aware of the issue in general
 7 around that restriction.

8 Q Do you know if you have a regulation or
 9 any written guidance about photocopying
 10 naturalization certificates at CIS?

11 A I don't know. I'm not aware of any
 12 regulations about it one way or the other. I am
 13 fairly sure that at some point in our history,
 14 INS/USCIS, we put out in some written form that
 15 making copies for public government purposes is
 16 acceptable.

17 Q You don't remember the specific document?

18 A I don't, I don't.

19 Q After a person is naturalized, what
 20 document is she going to have that shows her
 21 A-number?

22 A It might be on the naturalization

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1 certificate. I think it is. Other than that, it
 2 would just be in whatever papers the person has
 3 kept, historical papers.

4 Q Does a person who naturalizes get to keep
5 their green card?

6 A They are supposed to turn it in.

7 Q And isn't it true that not all
8 certificates of naturalization have an A-number
9 printed on them?

10 A I don't know. Nothing surprises me, so
11 it's completely possible.

12 Q Can you think of -- well, other than
13 somebody maybe making a notation of her A-number
14 before she becomes a citizen because you turn in
15 your green card and if you'll go with me on the fact
16 that not all naturalization certificates have an
17 A-number, is it possible that a naturalized citizen
18 might find herself not in possession of her
19 A-number?

20 A Sure.

21 Q Do you know when your status verifiers in
22 the SAVE program on a secondary verification could

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1 verify citizenship if given the number of the
2 Certificate of Naturalization?

3 A I believe they could because they have
4 access to Central Index, To the whole central index.
5 They have access to the A-file if they need to --
6 even.

7 Q If there's no A-number to work from, do
8 your status verifiers, can they perform just a name
9 search?

10 A Yes.

11 Q Date of birth search?

12 A Yes. They can do what's called a Person
13 Centric Query, which allows them to search a lot of
14 databases at once and then kind of figure it out.
15 They can do a wild card search in some of the
16 databases, you know, maybe -- maybe somehow you're
17 in Central Index with an E or no E or a Z or an S,
18 and sort of do a wild card search and then see what
19 queries might match that.

20 Q And hopefully, the person doesn't have the
21 name like my client, Maria Gonzalez, and it might
22 take longer.

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1 A Somewhat longer, yes.

2 Q Are you familiar with the length of time
3 involved with requesting and obtaining a replacement
4 Certificate of Naturalization?

5 A In general.

6 Q Do you know how long it takes these days
7 to process the N-565?

8 A Is the N-565 --

9 Q The request for the replacement
10 Certificate of Naturalization.

11 A I don't know specifically. We publish
12 time frames on the web site, so it's -- we could
13 find it out. I mean, in general, it's not a form
14 that's adjudicated as quickly as others.

15 Q Do you know whether CIS goes ahead and
16 gets a hard copy A-file in order to make the
17 decision whether or not to approve the request?

18 A I don't know.

19 Q Are you familiar with the circumstances
20 under which an applicant for replacement

21 naturalization certificate would be asked to present
22 for an interview?

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1 A To come into a USCIS office for an
2 interview about their application for -- I don't
3 know.

4 Q And the same question for the
5 circumstances under which an applicant might be
6 requested to submit more information to CIS in
7 support of an application for replacement
8 naturalization certificate.

9 A I don't know specifically, but that, in
10 general, is done when the adjudicator feels they
11 need more information to make a complete decision.

12 Q What does it mean if the web -- Internet
13 doesn't have a processing time for the Nebraska
14 service center for the replacement naturalization
15 certificate?

16 A I don't know.

17 Q Is there a particular meaning if the
18 Phoenix field office doesn't have on the web site a
19 processing time for the replacement naturalization
20 certificate?

21 A I don't know.

22 Q Do you know if Arizona requests for

0087

1 replacement naturalization certificates go to
2 Nebraska?

3 A I don't know.

4 Q Do you know whether after naturalization,
5 an individual has to continue to update CIS on her
6 residence address?

7 A I'm quite -- I can't imagine why -- I'm
8 not aware of any legal duty to continue notifying
9 USCIS of your address after you've been naturalized.

10 Q And do you know whether there's any legal
11 requirement for a naturalized citizen to carry
12 documentary proof of naturalization when out and
13 about?

14 A I'm not aware of any legal requirement of
15 that.

16 Q Okay. Contrasted with a legal permanent
17 resident, who is required to carry --

18 A Right, right.

19 Q But you're not aware of anything for
20 naturalized?

21 A I'm not aware of that, no.

22 MR. GREGORY: Within the immigration

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1 context. She can't speak for all.

2 BY MS. PERALES:

3 Q Correct. As a CIS representative, for CIS
4 purposes.

5 A Right.

6 Q Are you aware of any continuing CIS
7 business or interest in the naturalized citizen
8 after naturalization?

9 A Generally, there would be no interest
10 beyond, as we've discussed, if a person needs to
11 file for replacement certificate. Generally, our
12 job is done.

13 Q And you close the file, right?

14 A We -- in accord -- well, in accordance

15 with the A-file or record retention schedule, we
16 would retire the file.

17 Q Do you know whether you bring that file
18 out of retirement if the naturalized citizen, let's
19 say, years down the line marries somebody from
20 another country and wants to bring them -- immigrate
21 them as a spouse? Do you know if you go back in and
22 get all that stuff from the A-file?

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1 A In that particular fact pattern, I don't
2 know. I don't -- I don't know.

3 Q We spoke much earlier about the tentative
4 nonconfirmation rate in E-verify for naturalized
5 citizens.

6 A Yes.

7 Q Do you have a sense of why that was? Like
8 what was causing that rate of tentative
9 nonconfirmations?

10 A I totally know why that was. Currently we
11 verify citizenship for E-verify queries, including
12 naturalized citizens, because we don't distinguish
13 in the query whether between U.S.-born and
14 naturalized citizens.

15 We verify the fact of citizenship through
16 the SSA's database citizenship field.

17 If someone came in and got their Social
18 Security number when they were, for example, a
19 nonimmigrant and SSA recorded them as a
20 nonimmigrant, if they then went on to become a
21 permanent resident, didn't update SSA with that
22 fact, then became a citizen, didn't go back, which

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1 why would it be at the top of your to do list, you
2 know, to drive to SSA, stand in line, update your
3 records? You'd need to do that. But it's typically
4 not at the top of anyone's list, until they years
5 later want to file for retirement benefits.

6 But if they don't update their records
7 with SSA, it's just like if you got married and
8 changed your name and didn't tell SSA. When we go
9 to verify that fact against SSA's records, they
10 can't verify it, you didn't tell them, they don't
11 know.

12 It's not that something is wrong. It's
13 that SSA only accurately reflects what you told it.

14 And so because when we look at the makeup
15 of the U.S. citizenship mismatches, naturalization
16 is the biggest problem. This gets back to on May 5,
17 we'll be checking CLAIMS 4 and RNACS and then before
18 issuing a mismatch, so if we can find you, despite
19 the fact that you didn't update SSA, fabulous.

20 And then another improvement that's a May
21 5 improvement is that if we have to issue a mismatch
22 notice because we queried -- the query will include

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1 an SSN match. And if you -- if we don't have your
2 SSN in CLAIMS 4, for example, which usually we do,
3 but if we don't or we put it in wrong or whatever,
4 we'll still have to issue a mismatch notice, but the
5 notice is now going -- on May 5 and on is going to
6 say you're mismatched. If you want to contest it,
7 here's what you can do. You can go into SSA.
8 That's the process.

9 Or if you're naturalized, you don't even
10 have to tell your employer what path you're taking,
11 but if you're naturalized, you can call us, your DHS
12 status verifier line, and we'll be able to do the
13 searches, pull the A-file, if necessary in some rare
14 case, to confirm citizenship. You still need one
15 day to update SSA records, but it doesn't have to
16 muddy up the E-verify query.

17 Q So in this way, E-verify has relied on a
18 different database than SAVE has for U.S.
19 citizenship?

20 A Yes, because E-verify is verifying all
21 citizens, including U.S.-born.

22 Q And so E-verify is going to look to Social

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1 Security records, but SAVE is going to look to the
2 Central Index System?

3 A Yes, because for -- there's a different
4 purpose. For SAVE, no one asks SAVE or could ask
5 SAVE to verify U.S.-born citizens. It's just
6 naturalized. So it's just a different model.

7 And most new hires are U.S.-born.

8 Q Right.

9 A So --

10 MS. PERALES: Do you want to take a
11 minute? We're going to take a minute if you don't
12 mind.

13 (Recess.)

14 BY MS. PERALES:

15 Q Let's go back on the record. We thought
16 we had it all straight, and then we got confused
17 again about one of these things, so I'm just going
18 to ask you again.

19 A Okay.

20 Q We talked earlier about hopefully getting
21 a list from you of the data that SAVE accesses when
22 doing verification, and it brings me around to maybe

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1 a related question, which is what is the source of
2 the information that somebody is naturalized from
3 SAVE? What is SAVE looking at?

4 A Central Index.

5 Q Central Index.

6 A Uh-huh. The class of admission, data
7 field will say USC.

8 Q So when we go back to the SORN, which
9 lists information coming from Central Index in
10 paragraph A, you know what, it doesn't even say
11 naturalization.

12 A Class of admission code, that's where --
13 just like in over here, in the example, it shows
14 under class of admission, USC.

15 Q And that's page 6 of Exhibit 10?

16 A Yes.

17 Q Okay. So SAVE is looking to CIS to tell
18 it the class of admission?

19 A Yes.

20 Q And that's where we're seeing United
21 States citizen?

22 A Yes.

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1 Q Does CLAIMS 4 -- do you know whether
2 CLAIMS 4 feeds into CIS?

3 A Yes, it does.
4 Q Okay. It's not the other way around, is
5 it? Do you know which system --
6 A CLAIMS 4 definitely feeds into CIS.
7 Q Okay. Do you know whether SAVE always
8 looked for citizenship status, as it does now?
9 A Well, it's always looked for class of --
10 for the class of admission field and pulls, you
11 know, whatever is in that field. It's always done
12 that.
13 Q From the Central Index System?
14 A Yes.
15 Q All right. So to the extent that the
16 Central Index System would have put U.S. citizen in
17 class of admission, SAVE would have reflected that
18 from the beginning?
19 A Yes.
20 Q Okay. Does SAVE have all the noncitizens?
21 A Does SAVE what?
22 Q Is SAVE able to find all the noncitizens

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1 that are here, or is SAVE only looking at sort of
2 subcategory of noncitizens?
3 A Because SAVE uses VIS, so the question is
4 is the combination of the databases in VIS, does
5 that cover every noncitizen here.
6 Every noncitizen is going to be in text --
7 the answer is yes, because you're either going to be
8 in the CVP IBIS database from your arrival, or if
9 you have changed your status in some way with USCIS,
10 you're going to be in USCIS database.
11 What you might not have with that
12 combination is the most recent information or some
13 specific information.
14 So, for example, if you're a student, a
15 certain category of student, you're going to be in
16 IBIS under that class of admission a J or whatever.
17 But if, for example, in a -- if the SAVE query needs
18 to know if you're work authorized, for example, that
19 information might not always be in -- this goes very
20 beyond the voter registration context, but just in
21 general, your class of admission might not indicate
22 if you're work authorized or not, because some

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1 students in a certain class may be work authorized
2 or not, depending on what their school has done.
3 Some, by definition of their class, are work
4 authorized.
5 And so you might need more information to
6 know for some of the students that they're work
7 authorized, if you need to know that. And that
8 information would be CVIS business, which is an IBIS
9 system, which we're also actually connecting to.
10 So --
11 Q Let's say you're on a humanitarian parole.
12 Are you going to be in the IBIS system? Are you
13 then going to ultimately show up in SAVE?
14 A I'm not sure. I mean, definitely, that's
15 something we could find out. I'm just not
16 absolutely sure if everyone on parole automatically
17 gets an A-number or not. I don't know. Do all of
18 them automatically get an EAD, which I'm not sure.
19 And so --

20 Q I'll make it easier. If you have an
21 A-number, are you somehow in the SAVE universe?
22 A Yes, yes. And if you have an I-94 number,
0097

1 you're in VIS SAVE, meaning VIS universe, because of
2 IBIS, but you might -- we might not be seeing --
3 just because we see you, we may not see your latest
4 status.

5 So if we query by I-94 number, which runs
6 against IBIS, and you've changed status recently,
7 IBIS won't know that. IBIS only knows your status
8 when you entered.

9 And so I think between Central Index and
10 IBIS, we have probably everyone or almost everyone,
11 but in order to confirm their latest status, we had
12 to add CLAIMS 3, because CLAIMS 3, if you come in
13 and you're in IBIS but then you extended or change
14 status, you're going to be in CLAIMS 3, not IBIS,
15 with your most recent status.

16 Q with your A-number too? Is it --

17 A Yes, with your A-number.

18 Q Is it going to help connect the I-94 and
19 the A-number information together?

20 A No, it doesn't connect it. It just
21 queries against the right, like, subset of this
22 essentially.

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1 Q Okay. I pass the witness.
2 MR. GREGORY: No questions.
3 (Whereupon, at 1:54 p.m., the deposition
4 was concluded.)
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1 I HEREBY CERTIFY that I have read this
2 transcript of my deposition and that this transcript
3 accurately states the testimony given by me, with
4 the changes or corrections, if any, as noted.
5
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7 X

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11 subscribed and sworn to before me this day of
12 , 20 .
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X
Notary Public

My commission expires:

0100

C O N T E N T S

3	WITNESS	EXAMINATION
4	GERRI RATLIFF	
5	by Ms. Perales	5

E X H I B I T S

11	EXHIBIT NUMBER	IDENTIFIED
13	Deposition Exhibit 3	17
14	Deposition Exhibit 4	17
15	Deposition Exhibit 5	21
16	Deposition Exhibit 6	25
17	Deposition Exhibit 7	27
18	Deposition Exhibit 8	30
19	Deposition Exhibit 9	34
20	Deposition Exhibit 10	43
21	Deposition Exhibit 11	66
22	Deposition Exhibit 12	81