

12 the name.
 13 If it's exactly as it is, we have a good
 14 success rate with pulling the old film and
 15 retrieving the data.
 16 We send folks -- we have cards -- a lot of
 17 the old ceremonies were all done in the courts, so
 18 the certificates are on file with the court. And
 19 what we have is an index card that says where the
 20 person was naturalized and in what court and what
 21 date, and we turn that over to the districts a lot
 22 of times, you know, and they work with the courts in
 0059

1 some cases if it doesn't exist in our system.
 2 Q Do you know if it's not found by the
 3 court, whether they will just make up a new
 4 naturalization certificate, or are they really
 5 looking for that original?
 6 A I mean, they -- I'm sure they would --
 7 again, I don't know what they do in practice. I
 8 would -- I would think that they want some evidence
 9 that the person was actually naturalized before they
 10 can grant a new certificate, because everybody we
 11 deal with isn't totally honest all the time.
 12 So you have to have some proof that they
 13 were granted a benefit previously to reissue the --
 14 you know.

15 Q If I lost my naturalization certificate
 16 and I applied for a replacement, would CIS have to
 17 pull my A-record and physically inspect it before
 18 issuing me a replacement?
 19 A In practice, I would.
 20 Q Let me mark this as an exhibit. This is
 21 going to be an exhibit under seal, so we're going to
 22 have to seal it up at the end of the deposition. We
 0060

1 have an agreement in this case that when we have a
 2 document that is personal to an individual, that we
 3 have, you know, just the lawyers and the witness can
 4 look at it, and then we put it in a special envelope
 5 and seal it up.

6 (Quinn Exhibit 2 identified.)
 7 BY MS. PERALES:

8 Q Mr. Quinn, I'm handing you what has been
 9 marked Deposition Exhibit Number 2. Do you
 10 recognize this as a naturalization certificate?

11 A Yes.
 12 Q And do you see that this person
 13 naturalized in February of 1960?

14 A Yes, ma'am.
 15 Q Do you also see that there is a
 16 certificate of naturalization number on this
 17 document?

18 A Yes.
 19 Q And tell me, where is that number located?
 20 A The certificate number?

21 Q Yes.
 22 A Right up here in the upper right, next to
 0061

1 where it says "number."
 2 Q And that's the number --
 3 A 8123269.

4 Q Thank you. Can you find an A-number on
 5 this certificate?

6 A No, ma'am.
 7 Q Is it possible that this woman never
 8 received an A-number?
 9 A I don't want to say anything is possible.
 10 But is it possible? Yes. But what I would do -- I
 11 mean, you didn't ask, but I would --
 12 Q well, tell me what you would do, for what
 13 purpose.
 14 A well, for the purpose of updating the
 15 system, if there is an associated A-number, I would
 16 take the petition number, pull the old petition and
 17 then look at it to see if there was an associated
 18 A-number.
 19 Q How would you find the old petition?
 20 A By this number.
 21 Q Where would you go looking for the old
 22 petition?

0062

1 A In the archives, in -- fortunately, here
 2 we have a lot of the old documents. At headquarters
 3 we have them on film, so I can go to the petition
 4 number, or even they have old ledgers that go far
 5 back in history.
 6 what they could do currently, in the
 7 district offices, there's a mechanism to try to find
 8 it without -- based on the date she was naturalized,
 9 we're required to catalog, especially these older
 10 what we call retirement accessions, once they're
 11 done and they go to NARA, or the National Archives.
 12 Based on the date of my last action, I
 13 would go to my old 135s, which are where I list my
 14 files, and see what was the closest date to when
 15 this naturalization ceremony took place.
 16 Like if this took place February 1960,
 17 then I would go to my next retirement accession
 18 after this date, and she would probably -- or he,
 19 I'm sorry. Is that --
 20 Q she.
 21 A she would probably be included in that
 22 access number -- I mean in that accession.

0063

1 Now, it may take the retrieval of the
 2 whole accession, because when you are talking about
 3 back in the '60s, a lot of things were still done
 4 with, you know, pencil and paper. So -- and I can't
 5 account for the quality of bookkeeping back then.
 6 Obviously, it's nothing like with automation.
 7 so I would retrieve -- in my case, I would
 8 just retrieve the whole accession and catalog
 9 everything I could.
 10 Q And --
 11 A So if I look at the petition and I find an
 12 associated A-number within the petition, I would --
 13 I mean, then I would update the system.
 14 Q Does CIS routinely update its system with
 15 these old records?
 16 A Routinely? Yes. Here in D.C., we do it
 17 every day. I know currently that the national
 18 records center is pulling back old retirements
 19 office by office throughout the country because
 20 they're all moved next door to the federal records
 21 center, and they're updating all of them and
 22 bar-coding them.

0064

1 So I would say yes. I mean, I know for
2 the last few years, they have been doing it. And
3 they asked for extra money to do it, to take care of
4 these things. And we've submitted for the same for
5 here, to make sure the older retirements -- you
6 know, it's more than -- for more than this reason.
7 We do it for a lot of reasons. But we're trying to
8 pull them all back.

9 Q What is the likelihood that we would find
10 Ms. Weber, whose certificate we're looking at now,
11 what's the likelihood that we would find her in the
12 Central Index System right now?

13 A Oh, gosh. Honestly, I don't know. It
14 depends. I mean, I don't know -- if she was natz'd
15 in 1960, there's a good chance you wouldn't find her
16 right now.

17 Q How would we search for her in the Central
18 Index System, because we have no A-number?

19 A By name and date of birth is normally what
20 you'll do. But anyone -- you know, again, if she
21 was natz'd in 1960 and CIS didn't come around
22 until '75, there's -- the A-numbers from below 12

0065

1 million, unless an individual has filed for a
2 subsequent benefit, probably will not be in central
3 index.

4 Q And we don't even know if this woman has
5 an A-number, do we?

6 A No. Based on being naturalized in 1960, I
7 would say yes, she does, and it would be a low
8 A-number. And that's just based on the work I do
9 regularly.

10 Q Do you know when certificates of
11 naturalization began to feature A-numbers printed on
12 them?

13 A No, I don't know. That would be, like,
14 the form center and field operations folks when they
15 redesigned forms. No, I don't actually know the
16 date.

17 Q One last question on Exhibit 2. You had
18 mentioned you would look for her possible presence
19 in the Central Index System using her name. Would
20 it be possible to search based on her certificate of
21 naturalization number?

22 A Yes.

0066

1 Q And so if she was in the CIS system at
2 all --

3 A I could put in the certificate number,
4 right. And if she was in there, she would come up.

5 Q If I was living in Arizona and I lost my
6 naturalization certificate, would I apply at the
7 field office for a replacement?

8 A They used to, but my understanding now is
9 that service centers are processing the
10 replacements, either Dallas or Nebraska, depending
11 on where you live. And I believe that's posted on
12 the USCIS web site. I only know that because I had
13 some discussion with the service centers on a
14 teleconference, and it came up that they were
15 processing replacements now.

16 Now, I don't know that that means that the

17 districts are doing no more or if it was just the
 18 large numbers were moved to the service center.
 19 Q Are you aware of the service centers
 20 requesting A-records from the National Archives for
 21 the purpose of issuing replacement nat certificates?
 22 A Yes, ma'am.

0067

1 Q So you're the -- your office is the one
 2 that's tracking these A-records out to the service
 3 centers?
 4 A For the old ones, yes. Now, for the ones
 5 that we retired. If another office retired the
 6 file, they retrieve it and give it to the service
 7 center. It's only for the holdings. Like if we
 8 retired it, we would get it to them, yes.
 9 Q But you would be arranging for it to move
 10 from, let's say, Missouri out to Nebraska?

11 A Yes. If it's one we retire, yes.
 12 Q Would you know the reason you're moving
 13 this A-record, or you're just moving the A-record
 14 and you don't know that it's for a replacement nat
 15 certificate?

16 A You don't always know, but the service
 17 centers are good about, in central index, when you
 18 do a request, it has a person action line. And some
 19 folks will put N-565, or they will put their section
 20 and responsible party code from NFTS, which normally
 21 gives us a description. So we still know that it's
 22 for adjudication, and normally, it will -- it will

0068

1 let us know.
 2 In most cases, from the records side, we
 3 just want to make sure you're a valid employee or a
 4 current employee and you're requesting it and we get
 5 it to the right address. We don't necessarily get
 6 into the why do you need it issue. It's not our
 7 place to question it, to be honest.

8 Q Is it a fairly common occurrence for a
 9 file to be transferred from the National Archives
 10 out to one of the service centers for the purpose of
 11 issuing a replacement nat certificate?

12 A I believe it's a common practice, because
 13 again, they want validation, especially for the
 14 older ones that previously didn't appear in the
 15 mainframe, they would need some evidence.

16 Q And people do commonly request
 17 replacements for their nat certificate?
 18 A Sure, for -- whether if it's lost or like
 19 you had said earlier, in case of a fire, or
 20 something, or if they change their name, you know,
 21 marriage, divorce, whatever. So yeah, it's not
 22 uncommon.

0069

1 Q When I'm quiet, I'm skipping through
 2 questions.
 3 A Oh, no, that's fine.
 4 MR. GREGORY: Do you know how much longer
 5 you're going to be? Mike wanted to -- it's almost
 6 10:40. He had a doctor's appointment.

7 MS. PERALES: well, I'm trying to figure
 8 out if I have any questions left in my outline. Do
 9 you want to take a five-minute break and then --

10 THE WITNESS: No, no, I'd rather get

11 through so I can get to the doctor.
 12 MS. PERALES: Off the record.
 13 (Discussion off the record.)
 14 BY MS. PERALES:
 15 Q I have a few more questions, not too many.
 16 A Okay.
 17 Q At different times during our
 18 conversation, you've mentioned that when you
 19 transfer a file to somebody, that you want to make
 20 sure that they are authorized to receive that file;
 21 is that right? That the requester -- that it's a
 22 valid request for an A-file.

0070

1 A When we get a request for an A-file, we
 2 route ours to the records section there. But what
 3 we can -- we normally -- specifically in the case of
 4 classified material, we have to make sure that the
 5 person is entitled to view that file based on the
 6 type of material in there, the sensitivity.
 7 So we check -- in those cases, we check
 8 with the security office, make sure they are cleared
 9 to that level before we'll send the file or we'll
 10 deny it.
 11 Q Now, putting aside the classified A-files,
 12 let's just talk about a regular, average A-file. Is
 13 that information in that file considered personal or
 14 private?
 15 A I mean, it's -- we safeguard the stuff.
 16 we can't -- we don't just -- if you call and ask
 17 about somebody's file, we're not going to tell you.
 18 I'm not, anyway.
 19 Q And is it true that DHS from time to time
 20 will issue Privacy Act notices, talking about the
 21 protection of information?
 22 A Yes.

0071

1 Q And specifically in the A-files?
 2 A There's -- we get the Privacy Act
 3 information, and we get, what is it called, PA
 4 system notices, or Privacy Act system notices and
 5 what's current. So we review that stuff as it comes
 6 out to make sure, you know, that we're not breaking
 7 any laws or doing something we're not supposed to.
 8 Q Okay. Are you familiar with sort of the
 9 legal basis for being able to release information
 10 from an A-file to somebody outside of CIS?
 11 A Very, very limited. What I know under the
 12 Privacy Act that I'm -- you know, when there's an
 13 ongoing investigation from -- what I release to
 14 other federal agencies for investigations and those
 15 type things, we can give certain information out.
 16 And when I have a question, I go to the
 17 attorneys. I don't -- I mean, that's what I do,
 18 because I don't -- I don't just give people
 19 anything.
 20 But based on what we get in the Privacy
 21 Act, I mean, government agencies, investigative, you
 22 know, branches or enforcement-type things for active

0072

1 investigations, et cetera, we can release
 2 information.
 3 And the only other side of it that I know,
 4 that I'm confident with, is once somebody is dead,

5 they lose their right to privacy, because I've
6 actually asked that question, and I didn't know
7 that. I just figured it was yours, regardless of
8 whether you were deceased or not.

9 But I was assured that once a person is
10 deceased, they lose their right to privacy. So I
11 was -- then, of course, I went back and read to make
12 sure. But, you know.

13 Q Does a person who wants to receive a copy
14 of her own A-file -- is there a process that person
15 has to go through in order to get that information?

16 A Normally, they submit a FOIA request or
17 freedom of information request, the form, and then
18 they do -- they will request the file or the copy of
19 the file for that purpose.

20 Q And do you find yourself, sometimes your
21 office moving files to field offices?

22 A The national records center.

0073

1 Q From the national records center?

2 A To the national records center.

3 Q Do they make a copy of it there at
4 National?

5 A FOIA is now a centralized program for our
6 agency, for USCIS. So the FOIA staff, we get all
7 our requests from FOIA in Lee's Summit at the
8 national records center.

9 Q So if a person's alien record happens to
10 be somewhere other than Missouri, the record is
11 going to get sent to Missouri for --

12 A For the FOIA.

13 Q For the FOIA?

14 A Yes, yes.

15 Q You mentioned this earlier, but can you
16 explain to me the difference between the A-number
17 and the number of the certificate of naturalization?

18 A The number for the certificate is -- it's
19 exactly that. It's a secure form, so what happens,
20 they're issued in a sequence, in an order, and we
21 have to safeguard those in account -- they have to
22 be -- they're accountable forms. We have to account

0074

1 for each certificate, and they all have a number.

2 It's like a serial number, I guess is a
3 simple way to say it. The A-number is -- it becomes
4 related to the C-number when a person gets
5 naturalized and it goes in their A-file, but they're
6 two separate and distinct numbers. The A-file is
7 from beginning when you apply for benefits, and it
8 basically is your ID number to follow you through.
9 And that's the -- you know, the specific number for
10 that particular certificate.

11 Because you want to make sure there's no
12 duplicate issuance of certificates or no duplication
13 or the number is not reused.

14 And, again, we are responsible to secure
15 those. People go to jail over those things if they
16 misuse them.

17 Q The certificates?

18 A Yeah.

19 Q Well, and I did want to ask you, are you
20 familiar with the language on the certificate of
21 naturalization that talks about duplication?

22
0075

A Oh, yeah.

1 Q Tell me, what's that about?

2 A It's -- the question came up just this
3 morning. There's a blurb -- and I say a blurb, I
4 don't know -- had a saying that says you're not
5 supposed to reproduce it or some such thing.

6 I don't know if that came from the
7 Government Printing Office, or whose language that
8 is, you know.

9 Q Do you know what the purpose is of telling
10 people not to photocopy their nat certificate?

11 A I mean, just what I -- only from my own
12 experience is they -- people -- they don't want
13 people to use it fraudulently to copy, but -- and
14 the only reason I know -- I actually had a message
15 this morning regarding copying of files, because
16 someone had questioned if they could make a copy of
17 their certificate to turn in as part of an
18 employment process, because -- or something, some
19 such, somebody requested it.

20 You know, on there, it's based on the
21 Government Printing Office or the old standard, they
22 say don't reproduce it. But obviously, you know,

0076

1 there was a need at some point to reproduce it.

2 We make certified copies of files in
3 accordance with the law. We do -- 8 CFR is a
4 provision of law where we do certified copies for
5 specific reasons, court cases, et cetera, and we're
6 governed by that. So we produced them for official
7 purpose.

8 Q What is HC -- that term?

9 A Oh, 8 CFR, code of --

10 Q Oh, 8 CFR.

11 A Code of Federal Regulations.

12 Q I've got it. So CIS, if requested, can
13 make a certified copy of a naturalization
14 certificate?

15 A In accordance with the federal reg, yes.

16 Q Do you charge for that?

17 A No, because I do it for -- within the
18 agency. Like I said, it's normally for the
19 attorneys for court cases and those type things, for
20 discovery and that. But --

21 Q You don't do these at the request of
22 immigrants?

0077

1 A No, no. No, ma'am. I've never had to,
2 anyway.

3 Q In the case of the woman whose
4 naturalization certificate we've been looking at
5 here in Exhibit 2, and the fact that her A-number is
6 not on her certificate, do you know if she would
7 possess any other document showing her A-number, if
8 she had an A-number? would she still have her green
9 card?

10 A She shouldn't but again --

11 Q Why shouldn't she?

12 A If I go by today's practice, when you get
13 a certificate, we retrieve the green card. Now,
14 historically, back in the '60s, maybe you were
15 allowed to keep it as a -- I don't want to say

16 souvenir, but just to document your own path to
17 citizenship.

18 So as criteria changes and rules change --
19 I mean, now I know we recover them. Did they always
20 recover them? Probably not. I don't -- I don't
21 know back then.

22 She would -- we used to have U.S. citizen
0078

1 ID cards. I mean, we didn't but the service did,
2 way back when. So -- and some folks had -- the
3 number was on that. But again, without seeing if
4 she has an A-number, without pulling a petition, I
5 wouldn't know. But just based on the date, I would
6 say yes, she has a low A-number.

7 Q Do you have any knowledge of the records
8 concerning Maria Magdalena Gonzalez?

9 A I'm sorry?

10 Q Do you have any information, before I let
11 you go, do you have any information concerning the
12 records of a woman named Maria Magdalena Gonzalez
13 who lives in Yuma, Arizona? Have you --

14 A Do we have the records?

15 Q Do you -- as a 30(b)(6) witness today,
16 have you reviewed those records or do you have any
17 information about them?

18 MR. GREGORY: Excuse me, I objected, I
19 don't know if you got my letter, but I objected on
20 my grounds of nonintentional, on the grounds of Privacy
21 Act, so I would have to direct Mr. Quinn not to
22 answer that, unless we get --

0079

1 MS. PERALES: Right. Your objection was
2 to a request to produce those documents, and we
3 didn't request on the subpoena that any documents be
4 produced in the deposition. But we did request
5 somebody with knowledge, for example, to tell us the
6 amount of time that elapsed between the
7 naturalization and the time that the database was
8 updated.

9 MR. GREGORY: But the Privacy Act not only
10 covers records, but it covers information derived
11 from those records. So we can't short-circuit the
12 Privacy Act by just, you know -- for example, if you
13 had someone call up and say, you know, I don't want
14 the records but I want to know all information you
15 have on a particular person, you know, it's our
16 position the Privacy Act protects not only the
17 records itself but information derived from those
18 records, unless we get a waiver -- a valid waiver
19 that would allow us to disclose the records and/or
20 the information contained in those records.

21 MS. PERALES: All right. So is it your
22 position that CIS cannot release the information

0080

1 regarding the length of time that elapsed between
2 the date of naturalization and the date on which
3 Ms. Gonzalez's CIS records were updated to reflect
4 her naturalization?

5 MR. GREGORY: Right, because it's, well,
6 my understanding that Ms. Gonzalez -- well, she's a
7 citizen -- well, she's a citizen, and therefore,
8 Privacy Act applies to her and any records that are
9 retrievable by her name are protected by the Privacy

10 Act.

11 MS. PERALES: Okay. And is that also your
12 position with respect to Mr. Gonzalez and the amount
13 of time that elapsed between the date of his
14 naturalization and the date his records were updated
15 to reflect his naturalization?

16 MR. GREGORY: Yes, again, because as a
17 citizen, his records are -- information relating to
18 him is protected by the Privacy Act, and any
19 information that's retrievable through his name is a
20 Privacy Act record which we are prohibited from
21 disclosing, absent a waiver.

22 BY MS. PERALES:

0081

1 Q Do you have any knowledge of the E-verify
2 system?

3 A No.

4 MS. PERALES: I need a minute to confer.

5 THE WITNESS: Sure.

6 BY MS. PERALES:

7 Q My colleague wants me to ask you this
8 question one more time but I think we've gone over
9 it.

10 A That's fine.

11 Q Is it correct to say that the Central
12 Index System would contain, for a naturalized
13 immigrant, not only the alien registration number
14 but also the number of the certificate of
15 naturalization?

16 A If the system was updated correctly, yes,
17 it will have both.

18 Q So you could go in with just a certificate
19 number and attempt to locate an alien record based
20 on that?

21 A Yes.

22 Q In the Central Index System?

0082

1 A Yes.

2 Q Do you happen to know whether if one were
3 entering into either E-verify or the SAVE system,
4 whether information about naturalization certificate
5 numbers would be available?

6 A I don't know. I don't know. I don't work
7 with those systems. For CIS, it's just one of the
8 search categories, you can search by certificate
9 number if they claim citizenship. But the other
10 systems, I don't know.

11 MS. PERALES: Can we take a one-minute
12 break so I can take my folks outside and I'll pass
13 the witness.

14 THE WITNESS: Yes, ma'am.

15 (Recess.)

16 BY MS. PERALES:

17 Q Back on the record. I only have one
18 little tiny set of questions.

19 A Sure.

20 Q We talked a lot earlier about the
21 naturalization certificate, and I forgot to ask you
22 some questions related to the certificate of

0083

1 citizenship.

2 A Okay.

3 Q Are you familiar with the situation where

4 a minor child would become a citizen by operation of
5 law if both of his parents naturalized?

6 A I know there's a provision, Child
7 Citizenship Act, and there's certain criteria folks
8 meet, and the child can get -- become a U.S.
9 citizen.

10 Q Now, if the child's parents both become
11 citizens and naturalize -- it's actually only one,
12 thank you -- then does the child at that point have
13 the option of applying for a certificate of
14 citizenship?

15 A If -- I mean, if they meet the criteria
16 under the Child Citizenship Act, they're entitled to
17 be a citizen, but they don't necessarily have to
18 come to us.

19 Q Would that child --

20 A See, that's a dilemma for us.

21 Q You might not know about that child?

22 A Right. We would never know that their

0084

1 status changed, because in some cases -- and I try
2 to deal with it here as far as try to fix -- address
3 it -- if the parents go and take their information
4 and they satisfy the requirements for the U.S.
5 passport office, the child is issued a U.S. passport
6 and we never see them, they never file a petition
7 for a certificate, so we'll never know they became a
8 citizen unless subsequently, they go outside the
9 country and come back, and if they're stopped for
10 inspection and they say, well, our system says
11 you're whatever class of admission resident, what
12 are you doing with a passport type -- something like
13 that happens.

14 Or if they go to ask for a benefit and
15 they use their U.S. passport, we would have no way
16 to know they became a citizen because they didn't
17 have to come through us to get a certificate as a
18 child.

19 You know, in some cases then, we get folks
20 who apply for a passport but also want the
21 certificate, so their parents, if it's a minor
22 child, they will do the N600 to get the child a

0085

1 certificate as a derived citizen, but not in all
2 cases.

3 Q Is it possible that a person could be a
4 U.S. citizen and not have a U.S. passport, not have
5 applied for or gotten a U.S. passport, and also not
6 be in your system as a U.S. citizen?

7 A Is it possible that an individual could be
8 a U.S. citizen and not be in our system?

9 Q As a U.S. citizen. You had mentioned that
10 a moment ago --

11 MR. GREGORY: You mean talking about other
12 than individuals born in the country? Obviously we
13 won't have records of people born in the country.

14 BY MS. PERALES:

15 Q That's very true. Most people are U.S.
16 citizens and not in your system.

17 So let me back up a little bit, and let's
18 just stick with the Child Citizenship Act and what
19 we call either derived citizenship or whatever term
20 we want to use.

21 You had mentioned that some of these folks
22 who become citizens through the naturalization of a
0086

1 parent or both parents will go out and get
2 themselves a U.S. passport; is that right?

3 A Yes.

4 Q And sometimes they don't go out and get a
5 passport. Is that right also?

6 A I would guess. I mean, I would guess that
7 in some cases, they may not.

8 Q And so in that situation, a person might
9 have neither a passport nor a record with CIS
10 showing U.S. citizenship?

11 A That's possible, yes.

12 Q Okay. And in order for somebody who has
13 become a citizen by operation of law through the
14 naturalization of a parent to get a certificate of
15 citizenship, that person has to file an N600; is
16 that right?

17 A I couldn't be specific on -- I believe so,
18 yes.

19 Q All right. Some kind of paperwork?

20 A It's either going to be an N600, and in
21 some cases, depending on their age at the time, they
22 may require an N400. I don't know specifically, but
0087

1 they would have to file some sort of petition
2 stating that they are entitled to the benefit so
3 that it could be adjudicated.

4 Q And there would be a fee associated with
5 that as well?

6 A Yeah, as far as I know, yeah.

7 Q Okay. And do you know how long the
8 processing times are for these certificates of
9 citizenship, for example, in the Phoenix or Arizona
10 area?

11 A No, I don't -- I don't know what their
12 actual time frames are, no.

13 Q Do you have a process or a project in CIS
14 to match the records of naturalized citizens up with
15 information about their children, to kind of
16 automatically update the Central Index System to
17 show that minors have become citizens through the
18 naturalization of their parents?

19 A To match them up with their parents?

20 Q Yes, and then update your records to show
21 the minors becoming citizens.

22 A No, not right now, no.
0088

1 Q So the only way your records are going to
2 get updated in the Central Index System to show
3 citizenship is going to be if that person
4 affirmatively applies for that certificate?

5 A If they file a petition, right. Because
6 we don't know, like, how many children somebody has
7 or -- no, we don't -- no, there's no mechanism right
8 now, no, ma'am, none that I know of, anyway.

9 MS. PERALES: I pass the witness.

10 MR. GREGORY: No questions.

11 (Whereupon, at 11:07 a.m., the deposition
12 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.

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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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16 X
17 Notary Public

18
19
20
21 My commission expires: .

22
0090

1 C O N T E N T S

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3 WITNESS EXAMINATION
4 MICHAEL QUINN
5 by Ms. Perales 5

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9
10
11 E X H I B I T S

12
13 EXHIBIT NUMBER IDENTIFIED
14
15 Quinn Exhibit 1 8
16 Quinn Exhibit 2 60
17
18
19
20
21
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