

1 index -- before the inception of central index,
2 which was around 1975, they were -- we had
3 certificate numbers issued. There were some low
4 A-numbers, but as far back as what we call old law
5 files, there was a certificate number and a
6 certificate file.

7 So older historic files didn't have alien
8 numbers.

9 Q When you say "certificate number," are you
10 meaning certificate of naturalization?

11 A Yes, ma'am.

12 Q So these are for people who were aliens
13 and who became naturalized?

14 A They were naturalized prior to April of
15 1956, we used the certificate number. The problem
16 with certificate numbers -- not the problem. That
17 was just a different series. So there weren't
18 always A-numbers back in the '40s, '50s, '30s.
19 There were certificate file numbers, not alien file
20 numbers. Instead of an A, it was a C.

21 Q So if the number is leading with a C, we
22 know that this is one of these old certificate

1 got to think when they started being issued. We'll
2 find some low A-numbers around that time, but I
3 don't know the exact year that they moved over to
4 A-numbers.

5 Q So if I entered the country as a bride of
6 a U.S. citizen in 1960, would I have received an
7 A-number?

8 A Yes, ma'am.

9 Q All right. But maybe not in 1950?

10 A Possibly not.

11 Q Are you aware that some certificates of
12 naturalization do not have an A-number printed on
13 them?

14 A The old historic ones that didn't have an
15 A-number, yes.

16 Q If somebody has one of these C-numbers, or
17 certificate numbers, would you be able to find that
18 person in the Central Index System?

19 A Probably not. Those are the files that
20 are maintained on microfiche and microfilm.

21 Q What if somebody wrote to you and said
22 they needed a replacement copy of their

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

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

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?

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.

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.

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

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.

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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

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 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,

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?

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

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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