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UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

THE UNITED STATES OF AMERICA,
Plaintiff,

vs. No. 2:18-cv-00490-JAM-KJN

THE STATE OF CALIFORNIA; EDMUND
GERALD BROWN, JR., Governor of
California, in his Official Capacity;
and XAVIER BECERRA, Attorney General
of California, in his Official Capacity,
Defendants.

DEPOSITION OF JOE DOMINIC
Sacramento, California
Friday, June 1, 2018

Reported By:
JENNIFER SCHUMACHER
CSR No. 9763
Job No. 2930424
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Defendants.

Deposition of JOE DOMINIC, taken on behalf of
Plaintiff, at United States Attorney's Office, 501 I
Street, Sacramento, California, beginning at 11:21
a.m. and ending at 3:14 p.m. on Friday, June 1, 2018,
before JENNIFER SCHUMACHER, Certified Shorthand
Reporter No. 9763.

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WITNESS

EXAMINATION

JOE DOMINIC

By Mr. Reuveni

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EXHIBITS

Plaintiff's

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1 so access to the criminal offender record information is
2 accessible to immigration authorities.

3 BY MR. REUVENI:

4 Q. Regardless of whether their law enforcement
5 purpose is criminal or civil?

6 A. Correct.

7 Q. So you mentioned 54 databases in this
8 paragraph. Can you tell me which ones have an entry for
9 an individual's release date and time?

10 A. So our automated criminal history system has
11 custody release. Our supervised release file has
12 information for release into supervision, parole or
13 probation, and our CSAR system also has similar release
14 information.

15 Q. So just those three would have that
16 information, in your view?

17 A. That's what I'm currently aware of.

18 Q. Okay. And what databases would have
19 information concerning an individual's address, home or
20 work?

21 A. Automated criminal history system has an
22 address field, our supervised release file has address
23 information, and our sex and arson registry system,
24 CSAR, also has address information.

25 Q. What databases of those 54 have other -- other

1 THE WITNESS: Yes. I'm sorry. Go ahead. I
2 read that. I'm sorry.

3 BY MR. REUVENI:

4 Q. What is an interaction with the criminal
5 justice system?

6 A. Means that they were booked with an arrest
7 print coming in via our fingerprint system and/or going
8 into CDCR being released, or providing information to
9 our supervised release file, or if there's a registry
10 for California Sex and Arson Registry system, they would
11 put that information as well. So every time there's
12 interaction, if there's information has changed with
13 address, that information potentially could be updated
14 at that time.

15 Q. So is it fair to say that an arrest begins,
16 quote, interaction with the criminal justice system, and
17 anything that follows would be an interaction with the
18 criminal justice system?

19 A. In that particular point, the beginning, yeah,
20 would be the arrest print coming in.

21 Q. Okay. So you list a number of examples here
22 that are in the SRF. Down there at the bottom, line 28,
23 you say it has information about active parolees,
24 probationers, sex and arson registrants, violent
25 offenders and career criminals.

1 Active parolees, let's start with them. So is
2 an active parolee someone who has been convicted of a
3 crime and released from state as opposed to local
4 custody?

5 A. That's my understanding.

6 Q. So they have been in DOC custody; is that
7 right? They were detained by DOC or imprisoned by DOC
8 at a DOC facility?

9 MR. RUSSELL: Objection. Vague and ambiguous.

10 THE WITNESS: I'm sorry. In this case are you
11 referring to our --

12 BY MR. REUVENI:

13 Q. State Department of Corrections.

14 A. Corrections, right.

15 Q. So if they are an active parolee, they have
16 been paroled from the State Department of Corrections?

17 A. Correct.

18 Q. Okay. And then probationers. Probationers,
19 are these individuals who have been convicted of a
20 crime?

21 A. Yes.

22 Q. And they have just been -- instead of going --
23 serving time, they have been released on probation?

24 A. Uh-huh, correct.

25 MR. RUSSELL: Objection. Vague and ambiguous.

1 Lacks foundation.

2 BY MR. REUVENI:

3 Q. So they have been convicted of a crime, though,
4 correct?

5 A. If they are put on probation, they have
6 committed some crime.

7 Q. Crime. And they have been convicted of that
8 crime. And then in lieu of jail time they are on
9 probation?

10 A. (Witness nodded head.)

11 Q. Okay. And the sex and arson registrants, all
12 those individuals have been convicted of a crime as
13 well, right?

14 A. My understanding.

15 Q. In order to be -- because you mention it in
16 paragraph 7, when you refer to sex and arson registrants
17 here, are you referring to the same individuals that
18 would be in the California Sex and Arson Registry?

19 A. They are different systems.

20 Q. Okay. So tell me about the sex and arson
21 registrants in paragraph 6. What is that system?

22 A. This is for anyone who is getting released who
23 is a sex and arson registrant.

24 Q. Okay. I see. So my question is different. If
25 someone is a sex and arson registrant, i.e., they had to

1 register as a sex offender or an arson offender, would
2 they also be in the California sex arson registry?

3 A. They would have to -- law enforcement would be
4 entering that in as a registrant when they get released.

5 Q. And then they would be also be in CSAR, the
6 California Sex and Arson Registry?

7 A. That they have been released.

8 Q. Okay. Violent offenders, also convicted of a
9 crime, right? Not just someone who has been arrested or
10 suspected of, but they have been convicted of a crime?

11 A. Yes.

12 Q. And last, career criminals, same deal, they
13 have been convicted of several crimes, presumably,
14 that's what makes them a career?

15 A. (Witness nodded head.)

16 Q. Okay. So everyone in this example that you
17 have just -- we've just been discussing, the SRF file,
18 has been convicted of a crime?

19 A. Correct.

20 Q. None of them have been arrested for a crime and
21 not convicted?

22 A. Right, it's a supervised release file system,
23 so they are being released from custody.

24 Q. So I gave you the SB 54 statute a minute ago.
25 So let's go back to the definition of California law

1 THE WITNESS: Yeah, I'm having a -- again, I
2 understand these systems at a very high level, so I'm
3 trying to understand your question, what you're saying.

4 BY MR. REUVENI:

5 Q. I'm not asking you about the systems. I'm
6 asking you about your declaration. And I'm asking you
7 about where you referred to probationers in paragraph 6.

8 A. Uh-huh.

9 Q. So perhaps we should talk about probationers
10 again for a minute. Probationers, do you understand
11 this to include individuals who have not been detained
12 by the Department of Corrections and Rehabilitation?

13 A. So supervised release file gets information
14 from multiple entities and one is county probation and
15 CDCR.

16 Q. Okay. So it's your understanding that a
17 probationer could include both someone who was in the
18 custody of CDCR and someone who was released from county
19 custody?

20 A. I'm not clear about that, but potentially.

21 Q. Potentially. Okay. And a sex and arson
22 registrant, they would have been in the custody of CDCR
23 because they have been convicted of a sex or arson
24 crime?

25 A. Yes.

1 Q. Same with violent offenders?

2 A. Yes.

3 Q. And same with career offenders?

4 A. Yes.

5 Q. Okay. So let me refer you now to a different
6 section of SB 54, which you did tell us you were
7 familiar with. I am looking for the part with the
8 exceptions. Here we are. So if you look at page 3,
9 about halfway down page 3 it starts section 2, section
10 7282.5 of the Government Code. Do you see that?

11 A. Yeah.

12 Q. So this provision here lists various crimes
13 individuals have been convicted for that are not subject
14 to SB 54's limitations. So sex and arson registrants,
15 do you know if they would be subject to SB 4's [sic]
16 exceptions?

17 MR. RUSSELL: Objection. Vague and ambiguous.
18 Lacks foundation.

19 THE WITNESS: Can you please ask that question
20 again?

21 BY MR. REUVENI:

22 Q. So someone who has been convicted of a sex or
23 arson crime, do you know if they are covered by this
24 provision, 7282.5, meaning they are excepted from the
25 limitations that SB 54 places on local law enforcement?

1 Q. So could someone put that message in there?

2 A. I believe it's an open field, there's no
3 restrictions on what can be put into that field.

4 Q. Do you know if anyone is required by law or by
5 policy to actually input data into the SRF?

6 A. To the best of my understanding, CDCR is
7 required to send data to us. But maybe -- but from a
8 mandatory standpoint, statutory requirement, probation,
9 others, I believe are not.

10 Q. So only CDCR, to the best of your knowledge?

11 A. To the best of my knowledge.

12 Q. And again, CDCR would be -- have the custody of
13 people who have been convicted of crimes?

14 A. Correct.

15 Q. So do you know if the other agencies that input
16 information to the system, in fact, do it?

17 A. I've been -- my staff have told me that
18 other -- yes, they are inputting information. I just
19 don't have the details as to how many are doing it. But
20 yes, they are using the system.

21 Q. So could you say with 100 percent certainty
22 that everyone is filling out the information?

23 A. No, I cannot.

24 Q. Okay. You say in your paragraph 6 towards the
25 end there, "The SRF," this is the third line on page 2,

1 "The SRF also contains mandatory fields for the start
2 date of supervision." What does that mean, mandatory?
3 Is that what you just were referring to?

4 A. No. I'm referring to if there's a release, the
5 start date of supervision, they need to put that date in
6 there, the start date of supervision. That's mandatory.

7 Q. Are there any civil or criminal penalties for
8 failing to do so?

9 A. I'm not aware of that. I don't have knowledge
10 about that. My staff would know that.

11 Q. Do you know with 100 percent certainty that
12 this mandatory field is always filled out?

13 A. My understanding is if it's a mandatory field,
14 it has to be filled out.

15 Q. But you don't know if it's actually always
16 filled out?

17 A. Correct. But it's mandatory, meaning that for
18 them to be able to put into the system, the system would
19 require that data field to be updated.

20 Q. Oh, the system itself would prompt you to fill
21 that out?

22 A. Well, no, I'm saying it's a mandatory field.
23 I'm not sure if the system require -- I mean, it's
24 mandatory. I just don't -- I can't -- I don't have the
25 understanding -- knowledge of whether or not the system

1 requires it, but it's mandatory.

2 Q. Okay. So when you don't refer to any of the
3 other fields that you discuss in that paragraph as
4 mandatory, does that mean they are not mandatory?

5 A. Again, some data fields are mandatory and some
6 are optional. This is a mandatory field.

7 Q. So the address field is optional?

8 A. Yes.

9 Q. So the only field in SRF that is mandatory, as
10 you've stated here, is the start date of supervision?

11 A. That's not --

12 MR. RUSSELL: Objection. Vague and ambiguous.
13 Misstates testimony.

14 BY MR. REUVENI:

15 Q. Are there any other mandatory fields other than
16 start date of supervision?

17 A. Yes, there is.

18 Q. What are those?

19 A. I don't have those on the top of my head. My
20 staff would know that, but --

21 Q. But it doesn't include an address field,
22 correct?

23 A. Yes, it does include address field, name and
24 other data, PI information.

25 Q. I'm sorry. You earlier said the address field

1 is not mandatory.

2 A. Right.

3 Q. Are you saying it is mandatory?

4 A. No.

5 Q. Okay. It's not.

6 A. It's not. But I'm saying there's other data
7 fields within SRF.

8 Q. Okay.

9 A. I believe the attorneys gave you a document
10 that breaks down some more information about SRF.

11 Q. They did.

12 A. Okay.

13 Q. So in that last sentence there, "Under some
14 circumstances this would correlate with the date that a
15 person is scheduled to be released from custody," do you
16 see that, the last sentence in paragraph 6?

17 A. Yes.

18 Q. Now, does the start date of supervision, is
19 that just a date, like January 1st?

20 A. Yes, that's just a date.

21 Q. So it doesn't include a time?

22 A. I believe it doesn't include a time but a date.

23 Q. No time, just a date?

24 A. Correct.

25 Q. And when you say "in some circumstances this

1 putting the date into the system.

2 Q. You don't know how often that would happen?

3 A. Correct.

4 Q. Okay. Do you guys, your office, does it issue
5 any guidance or points of practice, best practices how
6 to enter this type of information, when to enter this
7 type of information?

8 A. So we have the handbook, and there's also -- we
9 do training to the various areas within the criminal
10 justice community in usage of the system and updating
11 the system.

12 Q. Does that guidance or training include guidance
13 or training on when it is appropriate to enter a start
14 date of supervision into the system?

15 A. I'm not clear about the details about what's
16 involved and what might be in the training or in the
17 guidebook fully.

18 Q. So --

19 A. As to that question.

20 Q. Okay. So you don't know?

21 A. I don't know.

22 Q. And I think earlier you mentioned the ACHS
23 database, the criminal history database, and you
24 mentioned addresses can appear in that database. Do you
25 know if entering an address in that database is

1 mandatory?

2 A. It's not mandatory.

3 Q. Do you know if you do enter a database -- I'm
4 sorry -- if you do enter an address, it must be the
5 actual house address?

6

7 [REDACTED]
8 the law enforcement agency time of booking is putting in
9 as address.

10 Q. I guess what I'm asking you is the field in
11 which you would input the address, if someone were to,
12 say, input simply Sacramento County as the address,
13 there would be no prompt to also enter, what about the
14 house address, what about the street, so someone could
15 enter just the county?

16 A. I am not sure about that, so I don't know.

17 Q. Okay. So you don't know if one has to enter a
18 specific home address into that field if they are going
19 to enter anything into that field?

20 A. It's an address field in the data specification
21 sheet that all LEAs have, so that's the field. If they
22 have an address, they would put that in that field, and
23 we accept what that would come in, in the address field.

24 Q. Right. So you would accept if it just listed
25 the county, or you would accept if it listed the house

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A. Yes.

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1 to immigration authorities, and they do have access and
2 the PP&Ps describe how to get access to our system.

3 BY MR. REUVENI:

4 Q. Earlier when I asked you a similar question,
5 you mentioned some guidance that is not yet complete.
6 Do you remember that?

7 A. I'm sorry?

8 Q. Earlier before the break you referred to
9 guidance that your office hadn't yet put out.

10 A. Yes.

11 Q. What guidance were you referring to?

12 A. SB 54 model policies that are required to be
13 implemented by October 1st.

14 Q. So let's go to the exhibit, I think it's A,
15 it's the SB 54 statute I gave you.

16 A. Which page?

17 Q. Go towards the end. It's 7484.8. Let me see
18 if I can actually find my copy here. Do you have a
19 copy? Great.

20 Yeah, page 10 at the bottom, subhead (b), where
21 it says, "For any databases operated by state and local
22 law enforcement," do you see that?

23 A. Yes.

24 Q. Is the guidance you're referring to guidance
25 that is required to be issued under that provision?

1 "Attorney General shall, by October 1st, 2018, in
2 consultation," da da da da da da da, "issue guidance
3 aimed at ensuring that those databases are governed in a
4 manner that limits the availability of information
5 therein to the fullest extent"?

6 A. That's the guidance.

7 Q. Okay. So this is guidance referring
8 specifically to immigration enforcement, correct?

9 MR. RUSSELL: Objection. Misstates testimony.
10 Lacks foundation.

11 THE WITNESS: So these are the model policies
12 that CJIS is currently working with DOJ counsel in
13 interpreting the bill.

14 BY MR. REUVENI:

15 Q. Right.

16 A. To help us develop. I can't speak to anything
17 beyond that.

18 Q. Will these policies change anything about the
19 access that DHS currently has to CLETS?

20 A. So as I stated, access to criminal offender
21 record information is accessible to immigration
22 enforcement authorities, and that's not -- that's in
23 place. And also SB 54 states that it's in accordance
24 with state and federal law, practical and consistent
25 with federal and state law.

1 Q. I'm sorry. Is that a yes or a no?

2 A. I'm just explaining that we have not published
3 the guidance, and I'm working with my legal counsel into
4 helping produce that document, and it will be within
5 federal, state law. That's my --

6 Q. So will the guidance change anything about
7 DHS's current access to CLETS?

8 A. I don't know. That's what I just said before
9 is what we're going to be doing with regards to
10 publishing the guidance. And again, within state and
11 federal laws.

12 Q. So where it says here at the bottom, and I'll
13 just read it to you, "published guidance, audit criteria
14 and training recommendation aimed at ensuring that those
15 databases are governed in a manner that limits the
16 availability of information therein to the fullest
17 extent practicable and consistent with federal and state
18 law to anyone or any entity for the purpose of
19 immigration enforcement." So that language is not
20 directed at immigration enforcement?

21 MR. RUSSELL: Objection. Vague and ambiguous.
22 Lacks foundation. Calls for a legal conclusion.

23 THE WITNESS: Yes. I did not say that.

24 BY MR. REUVENI:

25 Q. So the guidance you will be issuing will impact

1 immigration enforcement?

2 A. I can't answer that. It needs to be determined
3 based on what I just explained about what we're doing
4 with working on the guidance document. As I stated, DOJ
5 counsel is helping CJIS in putting that together with
6 the understanding that it's consistent with federal and
7 state law.

8 Q. And you don't know if it will change DHS's
9 access to CLETS?

10 A. That's for the -- for our counsel to determine.

11 Q. So it could or it could not, you don't know?

12 A. First of all, as I explained, access to
13 criminal offender record information to immigration
14 authorities will continue to be accessible.

15 Q. When you say that, do you mean ACHS, is that
16 what you're referring to?

17 A. I'm sorry?

18 Q. When you say criminal record --

19 A. Criminal offender record information.

20 Q. All right. So the database we discussed
21 earlier, ACHS, is that what you're referring to?

22 A. For example, that would be automated criminal
23 history system, supervised released file, and CSAR, for
24 example. Those are some of them.

25 Q. So access to those databases will not change?

1 MR. RUSSELL: Objection. Lacks foundation.
2 Asked and answered.

3 THE WITNESS: I believe I answered that
4 question before.

5 BY MR. REUVENI:

6 Q. Just remind me what your answer was. Was it a
7 yes or a no?

8 A. We have not published the guidance, but access
9 to the criminal offender record information, criminal
10 history information will be accessible to immigration
11 authorities.

12 Q. Are there any databases that will not be
13 accessible?

14 A. Again, I cannot answer that because the
15 guidance documents have not been published.

16 Q. So if guidance is issued that does preclude
17 access to certain databases, would your statement in
18 paragraph 9 that, quote, federal agencies may access
19 CLETS in the same manner as state and local law
20 enforcement officers, need to be amended?

21 MR. RUSSELL: Objection. Vague and ambiguous.
22 Lacks foundation. Assumes facts not in evidence.

23 THE WITNESS: Can you repeat that question?
24 I'm trying to -- what your question is --

25 BY MR. REUVENI:

1 Q. You have a statement here in paragraph --

2 A. Can look at the document?

3 (Interruption by the reporter.)

4 THE WITNESS: I'm sorry. I'd like to look at
5 the document.

6 BY MR. REUVENI:

7 Q. Should be one of the documents in front of you,
8 paragraph 9, third sentence starting, "Officers with
9 federal agencies may access CLETS in the same manner as
10 state and local law enforcement officers," lines 22 and
11 23.

12 Can you say, as you sit here, with certainty
13 that that will still be correct after this guidance is
14 issued?

15 MR. RUSSELL: Objection. Vague and ambiguous.
16 Calls for speculation. You can respond.

17 THE WITNESS: Repeat the question one more time
18 since I've read this. Sorry.

19 BY MR. REUVENI:

20 Q. So you say here, "Federal agencies may access
21 CLETS in the same manner as state and local law
22 enforcement officers." As you sit here today, can you
23 say that will still -- with certainty that will still be
24 the case after the guidance you referred to is issued?

25 A. Yes. Criminal justice purposes.

1 Q. Okay. So that -- again, that's the criminal
2 history, SRF and CSAR that you referred to earlier?

3 A. No. Officers of federal agencies may access
4 CLETS in the same manner as state and local law
5 enforcement officers.

6 Q. Right. So my question is, is that still going
7 to be correct once this guidance is issued that you
8 referred to earlier?

9 MR. RUSSELL: Objection. Vague and ambiguous.
10 Calls for speculation.

11 THE WITNESS: The statement that I made here is
12 accurate in my declaration.

13 BY MR. REUVENI:

14 Q. As of the date you made it?

15 A. It's accurate.

16 Q. As of today, as of the date you made it, when
17 do you mean?

18 A. As the date I made it is accurate.

19 Q. Okay. So I'm asking you once this guidance is
20 issued, to the best of your knowledge, will that
21 statement still be accurate?

22 A. Again, I'm working with my legal counsel at DOJ
23 to create the guidance documents.

24 Q. So you don't know? Is it fair to say you don't
25 know if that will still be accurate? It may be

1 accurate, it may not be, you just don't know?

2 A. I don't know.

3 Q. Okay. If someone were to contact a local law
4 enforcement officer with access to CLETS and say to
5 them, I would like you to access the CLETS database for
6 me, I need information, I'm going to go enforce civil
7 immigration law with the information you give me, could
8 the law enforcement officer respond to that query?

9 A. Would you repeat that again? I'm sorry. It
10 was long.

11 Q. Certainly. So if someone were to contact a law
12 enforcement agency who has access to CLETS, so they are
13 not looking at CLETS themselves, they are contacting an
14 officer of a local law enforcement agency who does have
15 access to CLETS, and they ask, I need you to give me
16 some information from CLETS, I am going to use it for
17 civil immigration law enforcement purposes, would that
18 be an acceptable use of CLETS if you were to respond?

19 A. Again, in my declaration I say that access to
20 criminal offender record information is accessible to
21 immigration authorities.

22 Q. Even if they are going to use it for civil
23 immigration enforcement purposes?

24 A. That is my understanding, for criminal
25 offender -- yes, if they are using criminal offender

1 issuing the guidance, working with DOJ counsel, and it
2 will be in compliance with state and federal laws is
3 what I said.

4 Q. Right.

5 A. So I don't know.

6 Q. I think you said CSAR, criminal history and the
7 SRF, they would continue to have access to that, those
8 three databases?

9 A. Who? I'm sorry.

10 Q. DHS would continue to have access to SRF, CSAR
11 and criminal history file after October 1st, 2018?

12 A. They have access now.

13 Q. And I believe you said earlier they will
14 continue to have access regardless of what the content
15 of this guidance you referred to is?

16 A. That is my understanding.

17 Q. So the other 51 databases, they could lose
18 access to those databases in some way?

19 MR. RUSSELL: Objection. Lacks foundation.
20 Calls for speculation.

21 THE WITNESS: So I'm going to go back to what I
22 said earlier, we're in the process of doing the guidance
23 documents with DOJ counsel, and so -- and again, we're
24 going to be within, you know, the state and federal laws
25 will be the parameters.

1 BY MR. REUVENI:

2 Q. So it's possible, you can't rule it out with
3 certainty?

4 A. I don't know, to answer that question. I mean,
5 as far as beyond what I just said.

6 Q. All right. I think we're close to done. Let's
7 take another break real quick, and then I'll wrap it up.

8 VIDEO OPERATOR: Okay. We're off the record.
9 It's 3:05.

10 (Break.)

11 VIDEO OPERATOR: Okay. We're back on the
12 record it's 1:13.

13 THE REPORTER: 3:13.

14 VIDEO OPERATOR: 3:13.

15 BY MR. REUVENI:

16 Q. We're almost done. Just a couple just
17 housekeeping type questions. Is there any reason why
18 the testimony you gave us today is inaccurate or
19 problematic?

20 A. I provided the answers to the best of my
21 ability with what I understand.

22 Q. Nothing impaired your ability to give testimony
23 today that you're aware of?

24 A. No, absolutely not.

25 Q. And with respect to this declaration, so your

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2 Joe Dominic

3 INSTRUCTIONS TO THE WITNESS

4 Please read your deposition over
5 carefully and make any necessary corrections.

6 You should state the reason in the
7 appropriate space on the errata sheet for any
8 corrections that are made.

9 After doing so, please sign the errata
10 sheet and date it.

11 You are signing same subject to the
12 changes you have noted on the errata sheet,
13 which will be attached to your deposition.

14 It is imperative that you return the
15 original errata sheet to the deposing
16 attorney within thirty (30) days of receipt
17 of the deposition transcript by you. If you
18 fail to do so, the deposition transcript may
19 be deemed to be accurate and may be used in
20 court.

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3 E R R A T A

4 - - - - -

5 PAGE LINE CHANGE

6 11 16 "Rich" should be "Reich"

7 Reason: Spelling

8 26 17 "pneumonic" should be "mnemonic"

9 Reason: Spelling

10 69 1 "bimetric" should be "biometric"

11 Reason: Spelling

12 69 1 "bimetrically" should be "biometrically"

13 Reason: Spelling

14 72 23 "CIC" should be "NCIC"

15 Reason: Spelling

16 73 1 "CIC" should be "NCIC"

17 Reason: Spelling

18 - - - - -

19 Reason: _____

20 - - - - -

21 Reason: _____

22 - - - - -

23 Reason: _____

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Joe Dominic

ACKNOWLEDGMENT OF DEPONENT

I, Joe Dominic, do
hereby certify that I have read the foregoing
pages and that the same is a correct
transcription of the answers given by
me to the questions therein propounded,
except for the corrections or changes in form
or substance, if any, noted in the attached
Errata Sheet.

6/5/18
DATE

[Signature]
SIGNATURE

2930424