

# **EXHIBIT 131**

DONALD WARREN NEUFELD, 30(B)(6) - 08/09/2018

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

Case No. 3:18-cv-1554-EMC

-----x

CRISTA RAMOS, et al.,  
Plaintiffs,

vs.

KIRSTJEN NIELSEN, et al.,  
Defendants.

-----x

VIDEOTAPE 30(B)(6) DEPOSITION OF  
U.S. DEPARTMENT OF HOMELAND SECURITY  
VIA ITS REPRESENTATIVE DONALD WARREN NEUFELD

Thursday, August 9, 2018  
Washington, D.C.

REPORTED BY:  
Susan Ashe, RMR, CRR  
Job Number LA-185456

1 acting director.

2 I'm trying to remember all these.

3 Then went back to headquarters as the  
4 chief of field operations, which was the component  
5 that oversees not the service centers but the other  
6 offices, domestic offices that adjudicate benefits  
7 involving interviews.

8 I became the deputy associate director for  
9 domestic operations, which was a component at the  
10 time that managed all the domestic operations other  
11 than the asylum offices.

12 We had a reorganization in 2010 that  
13 basically dissolved the domestic operations  
14 component and established Service Center Operations  
15 as its own directorate, and I became the associate  
16 director at that time.

17 So that was in January/February of 2010,  
18 and that's what I've been doing ever since.

19 Q. And I apologize, I know you said this. Is  
20 your title still associate director?

21 A. Yes.

22 Q. Is there a director of Service Center  
23 Operations?

24 A. Yes.

25 Q. And who is that?

1 A. No -- oh, director? I'm sorry, I  
2 misunderstood your question.

3 Q. I'm sorry. I apologize.

4 I have not worked in CIS, so if I mix up  
5 some of the titles and names -- let me ask that a  
6 different way.

7 You're the associate director of Service  
8 Center Operations.

9 Who do you report to?

10 A. I report to the deputy director of USCIS.

11 Q. And who currently has that role?

12 A. There's nobody permanently in that role.

13 The acting deputy director is Tracy  
14 Renaud.

15 Q. Roughly how long has Ms. Renaud been in  
16 that position?

17 A. Probably about a year.

18 Q. Did she work with USCIS before the current  
19 administration came in?

20 A. Yes.

21 Q. Do you recall what her role was before  
22 this administration?

23 A. When she's not the acting deputy, she is  
24 the associate director for management, the  
25 management directorate. And I believe she was in

1           A.     So I get the order of these things mixed  
2 up, but I know that Haiti, because I asked Haiti,  
3 was the last one that we -- was the first one that  
4 we did not do the FRN for. So whatever ones came  
5 after that, we did not do the FRN.

6           Q.     Okay. And how did this transition on  
7 drafting the FRN come about?

8           A.     I'm not sure precisely if it was directed  
9 or just a group decision that that's what made sense  
10 to do.

11                     Again, the FRN really is a document that  
12 only can be finalized once you know what the  
13 decision is going to be because it just announces  
14 the decision and then explains the basis for the  
15 decision and then the operational process that needs  
16 to follow from that.

17                     And the difference now is that the  
18 decisions are less foreseeable what they're going to  
19 be.

20                     So the effort involved in developing the  
21 FRN for one of those possible outcomes is not as  
22 worthwhile.

23                     If you don't know what the likely decision  
24 is going to be, then you can't really draft  
25 something that's explaining what that decision that

1 DISTRICT OF COLUMBIA )

2 : ss

3

4 I, SUSAN ASHE, a Registered Merit Reporter  
5 and Notary Public, do hereby certify:

6 That the foregoing proceedings were taken before  
7 me at the time and place herein set forth; that any  
8 witnesses in the foregoing proceedings, prior to  
9 testifying, were placed under oath; that a verbatim  
10 record of the proceedings was made by me using machine  
11 shorthand which was thereafter transcribed under my  
12 direction; further, that the foregoing is a true record  
13 of the testimony given.

14 Before completion of the deposition, review of  
15 the transcript [X ] was [ ] was not requested. If  
16 requested, any changes made by the deponent (and provided  
17 to the reporter) during the period allowed are appended  
18 hereto.

19 I further certify that I am not interested in  
20 the outcome of the action.

21 WITNESS my hand this date August 10th, 2018.

22

23

24

25 My Commission Expires: May 31, 2022