

*Office of the Principal Legal Advisor*

U.S. Department of Homeland Security  
500 12<sup>th</sup> Street, S.W. (b)(6);(b)(7)(C)  
Washington, DC 20024



**U.S. Immigration and  
Customs Enforcement**

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Jane Minichiello, Chief Counsel  
Office of Chief Counsel, Newark

John Tsoukaris, Field Office Director  
Enforcement and Removal Operations, Field Office Newark

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

*Office of the Chief Counsel*

**U.S. Department of Homeland Security**

26 Federal Plaza, Rm. (b)(6)  
New York, NY 10278



**U.S. Immigration  
and Customs  
Enforcement**

March 22, 2017

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Assistant Chief Counsel  
Office of the Chief Counsel, New York City

THROUGH: (b)(6);(b)(7)(C) Senior Attorney  
Office of the Chief Counsel, New York City

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, Field Office New  
York City

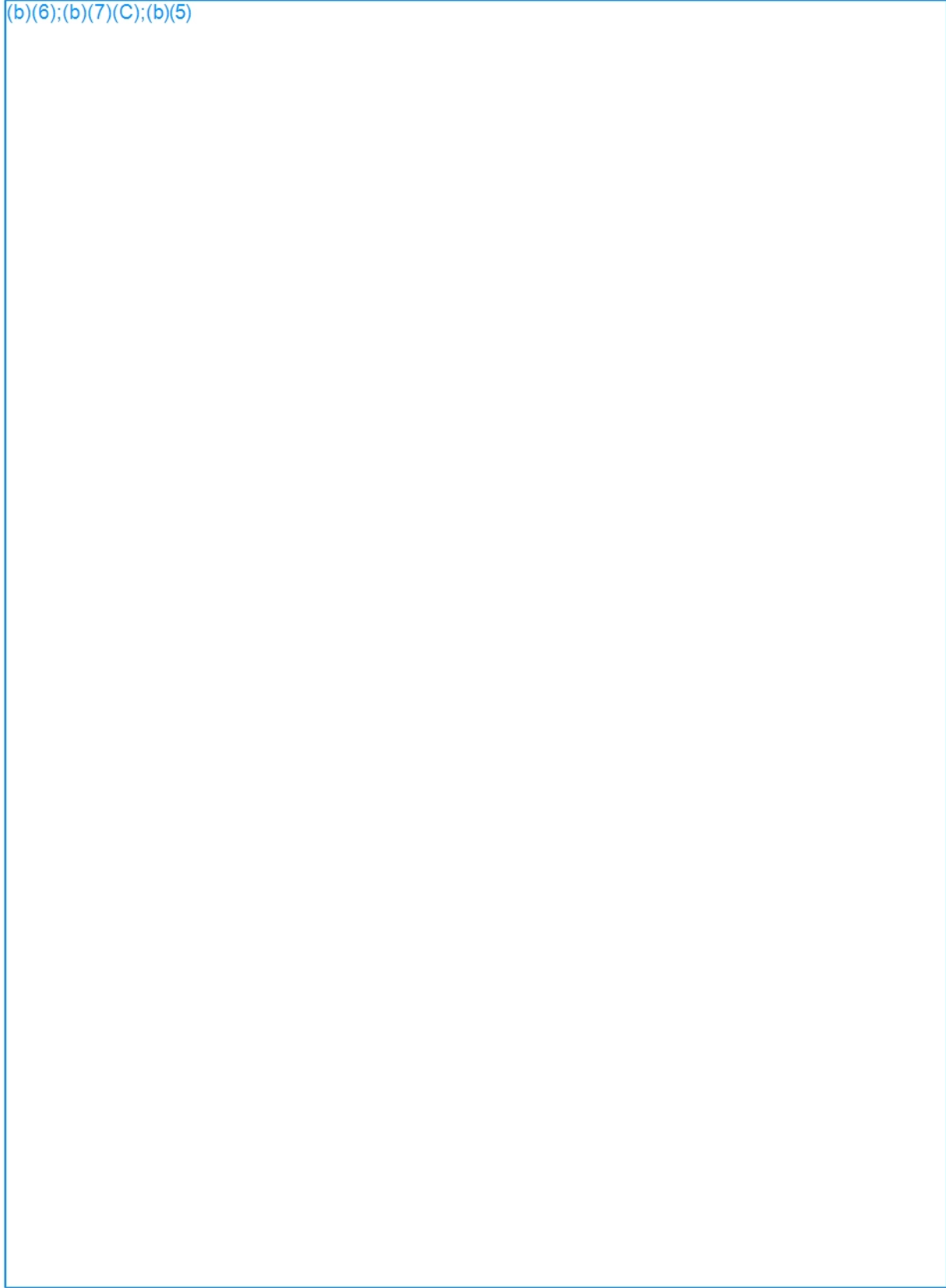
SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



*Office of the Principal Legal Advisor*

**U.S. Department of Homeland Security**  
500 12<sup>th</sup> Street, S.W., 11<sup>th</sup> Floor  
Washington, DC 20024



**U.S. Immigration and  
Customs Enforcement**

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Jane Minichiello, Chief Counsel  
Office of Chief Counsel, Newark

John Tsoukaris, Field Office Director  
Enforcement and Removal Operations, Field Office Newark

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

*Office of the Chief Counsel*  
U.S. Department of Homeland Security

18201 S.W. 12<sup>th</sup> Street  
Miami, Florida 33194



U.S. Immigration and  
Customs Enforcement

May 11, 2017

MEMORANDUM FOR: DPLA for FIELD LEGAL OPERATIONS, OPLA  
ASSISTANT DIRECTOR FOR FIELD OPERATIONS, ERO

FROM: Nelson Perez  
Chief Counsel  
Office of Chief Counsel, Miami

Marc J. Moore  
Field Office Director  
Enforcement and Removal Operations, Field Office Miami

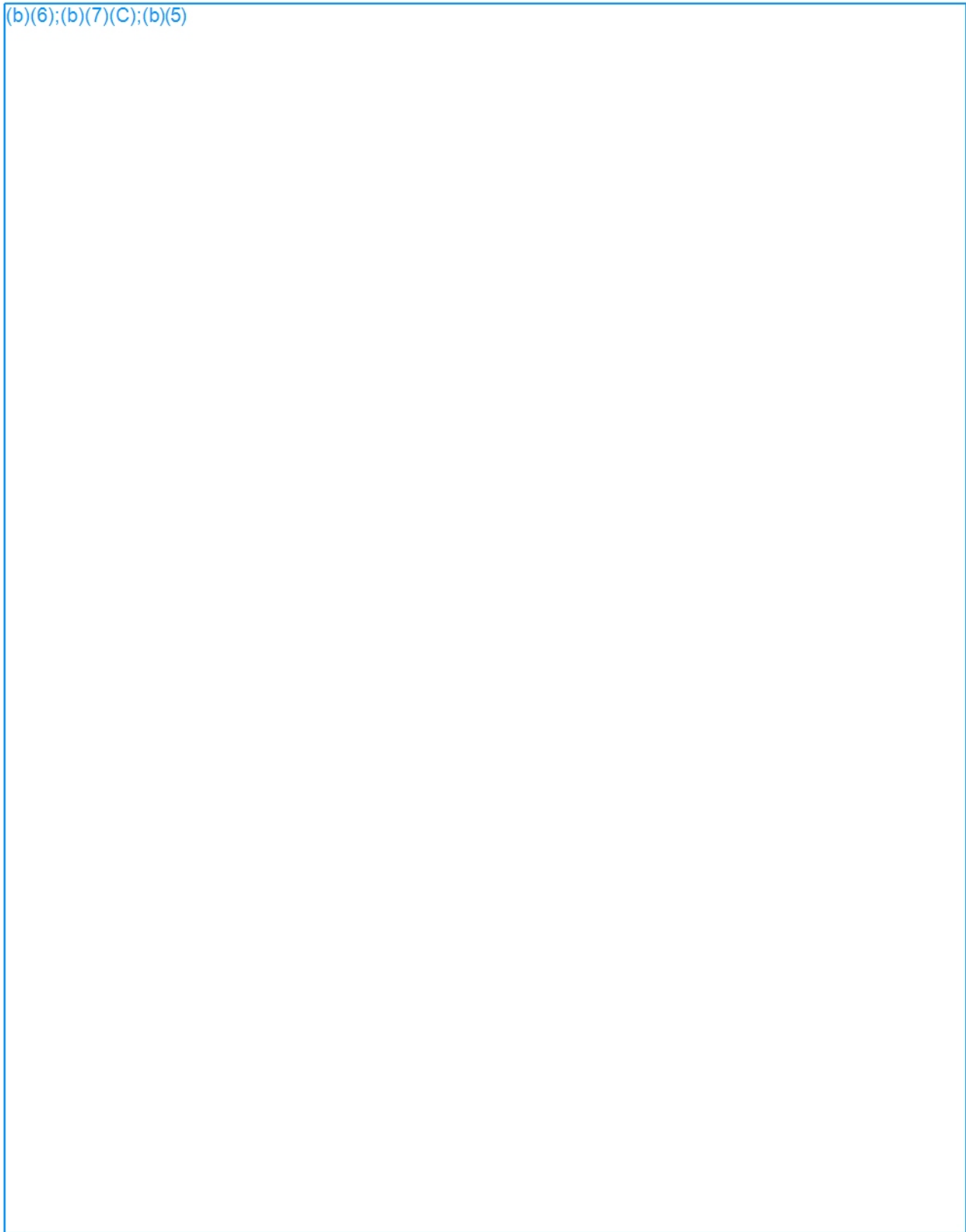
SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)





LEGAL ANALYSIS

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

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(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

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(b)(5);WIF Draft

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Page 4571

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(b)(5);WIF Draft

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Page 4572

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Page 4575

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(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Jane Minichiello, Chief Counsel  
Office of Chief Counsel, Newark

John Tsoukaris, Field Office Director  
Enforcement and Removal Operations, Field Office  
Newark

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

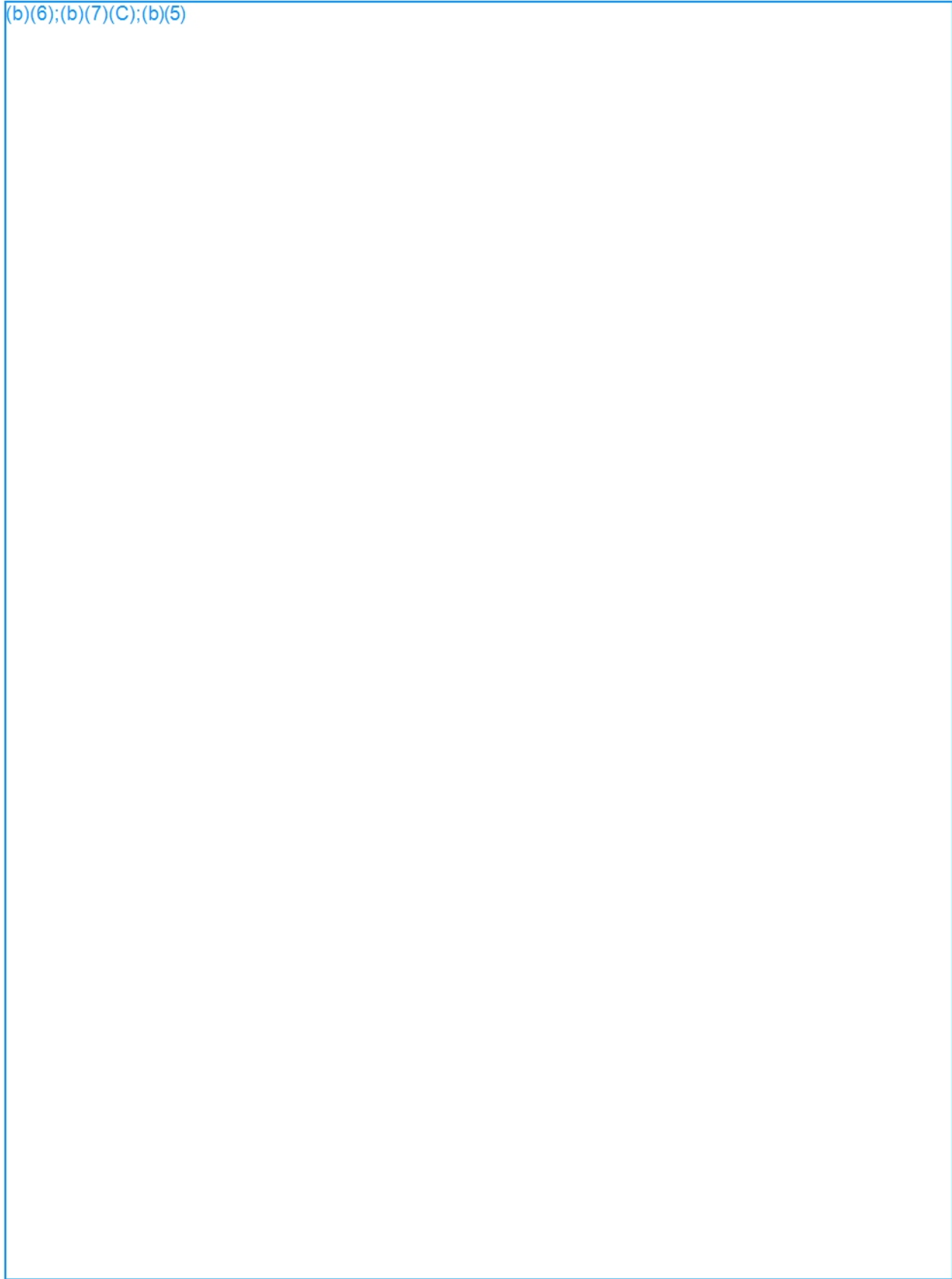


(b)(6);(b)(7)(C);(b)(5)





(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)



DATE: January 27, 2017

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Raphael Choi, Chief Counsel,  
Office of Chief Counsel, Arlington

M. Yvonne Evans, Field Office Director  
Enforcement and Removal Operations, Field Office, Washington

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)





U.S. Immigration  
and Customs  
Enforcement

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

April 6, 2017

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Karen E. Lundgren, Chief Counsel  
Office of Chief Counsel, Chicago

Ricardo Wong, Field Office Director  
Enforcement and Removal Operations, Field Office Chicago

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

Page 4593

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Page 4595

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of the Freedom of Information and Privacy Act

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Withheld pursuant to exemption

(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

## USC CLAIMS MEMORANDUM TEMPLATE

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Interim Chief Counsel  
Office of Chief Counsel, Phoenix

Enrique Lucero, Field Office Director  
Enforcement and Removal Operations, Field Office  
Phoenix

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

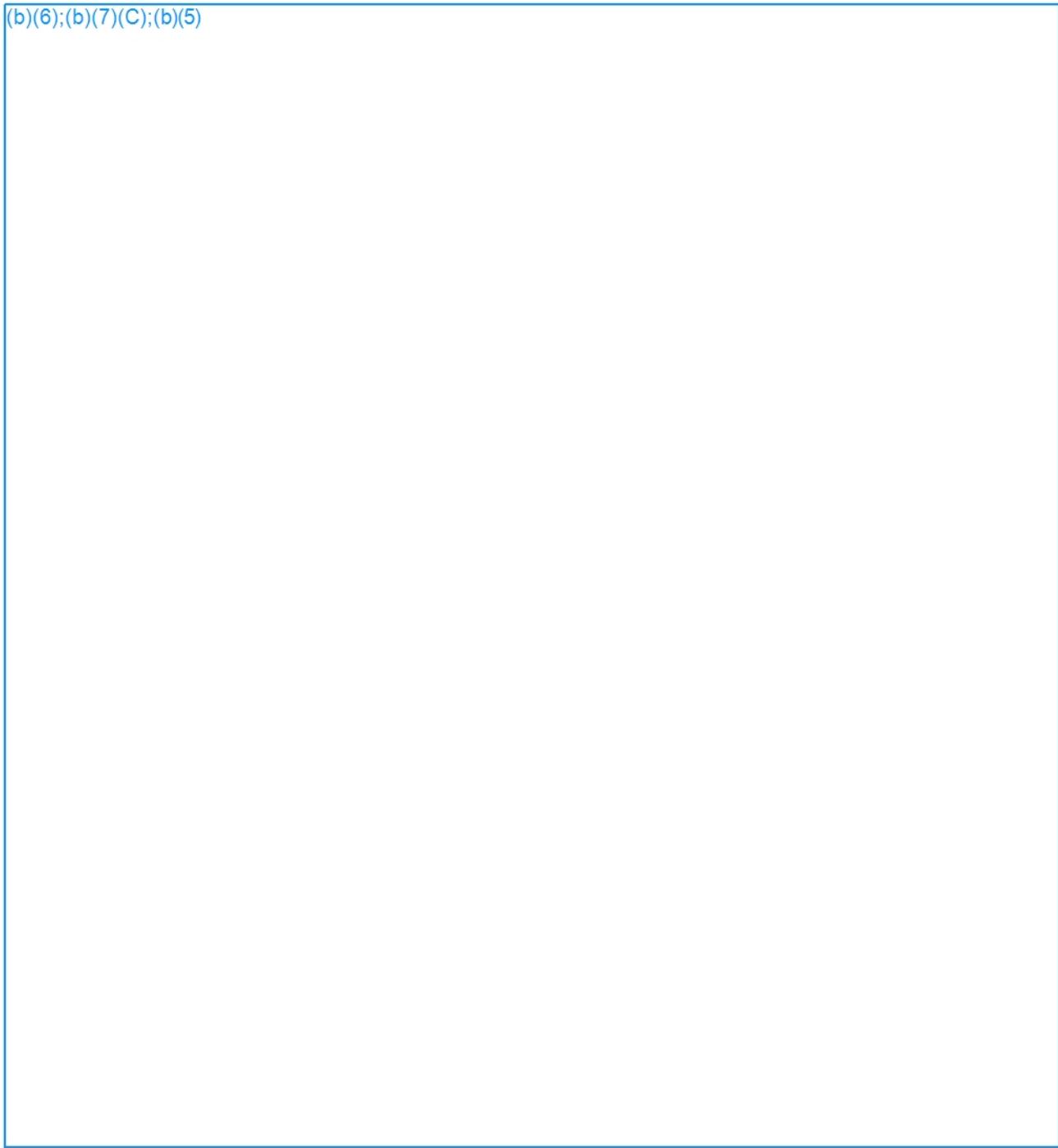
(b)(6);(b)(7)(C)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)



## USC CLAIM MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Jason B. Aguilar, Chief Counsel  
(b)(6);(b)(7)(C) Deputy Chief Counsel  
, Assistant Chief Counsel  
Office of Chief Counsel, San Diego

Gregory Archambeault, Field Office Director  
Enforcement and Removal Operations, Field Office San  
Diego

CLAIMANT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)





U.S. Immigration  
and Customs  
Enforcement

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

March 28, 2017

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistance Director for Field Operations, ERO

FROM: Karen E. Lundgren, Chief Counsel  
Office of the Chief Counsel, Chicago

Ricardo Wong, Field Office Director  
Enforcement and Removal Operations, Field Office Chicago

SUBJECT: Claim to United States Citizenship

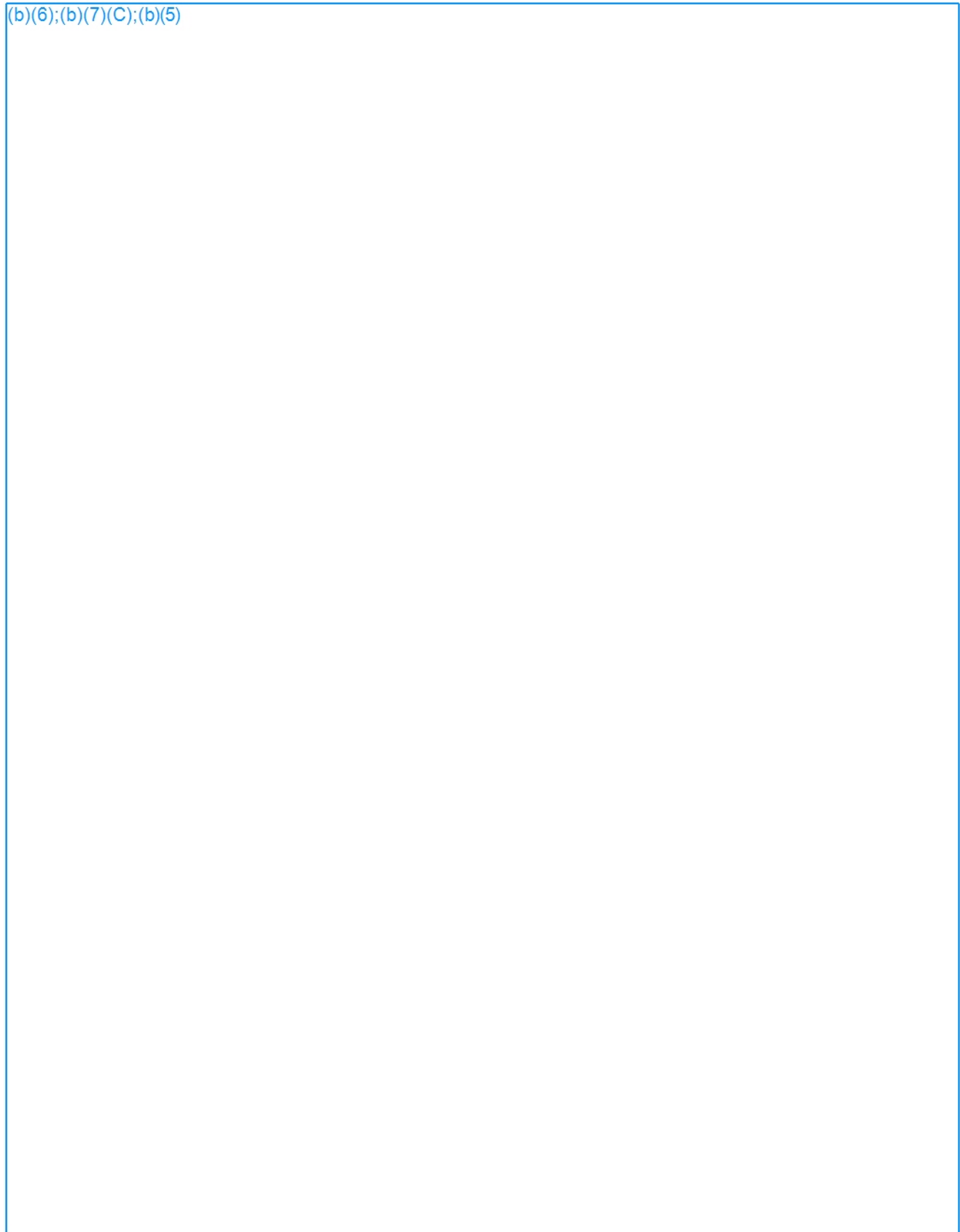
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C)



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of the Freedom of Information and Privacy Act

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Sarah L. Hartnett, Chief Counsel  
Office of Chief Counsel, Houston, Texas

Patrick D. Contreras, Field Office Director  
Enforcement and Removal Operations, Field Office Houston,  
Texas

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(7)(C);(b)(6);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(7)(C);(b)(6);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

*Office of the Chief Counsel*  
U.S. Department of Homeland Security

18201 S.W. 12<sup>th</sup> Street  
Miami, Florida 33194



U.S. Immigration and  
Customs Enforcement

January 27, 2017

MEMORANDUM FOR: DPLA for FIELD LEGAL OPERATIONS, OPLA  
ASSISTANT DIRECTOR FOR FIELD OPERATIONS, ERO

FROM: Nelson Perez  
Chief Counsel  
Office of Chief Counsel, Miami

Marc J. Moore,  
Field Office Director  
Enforcement and Removal Operations, Field Office Miami

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

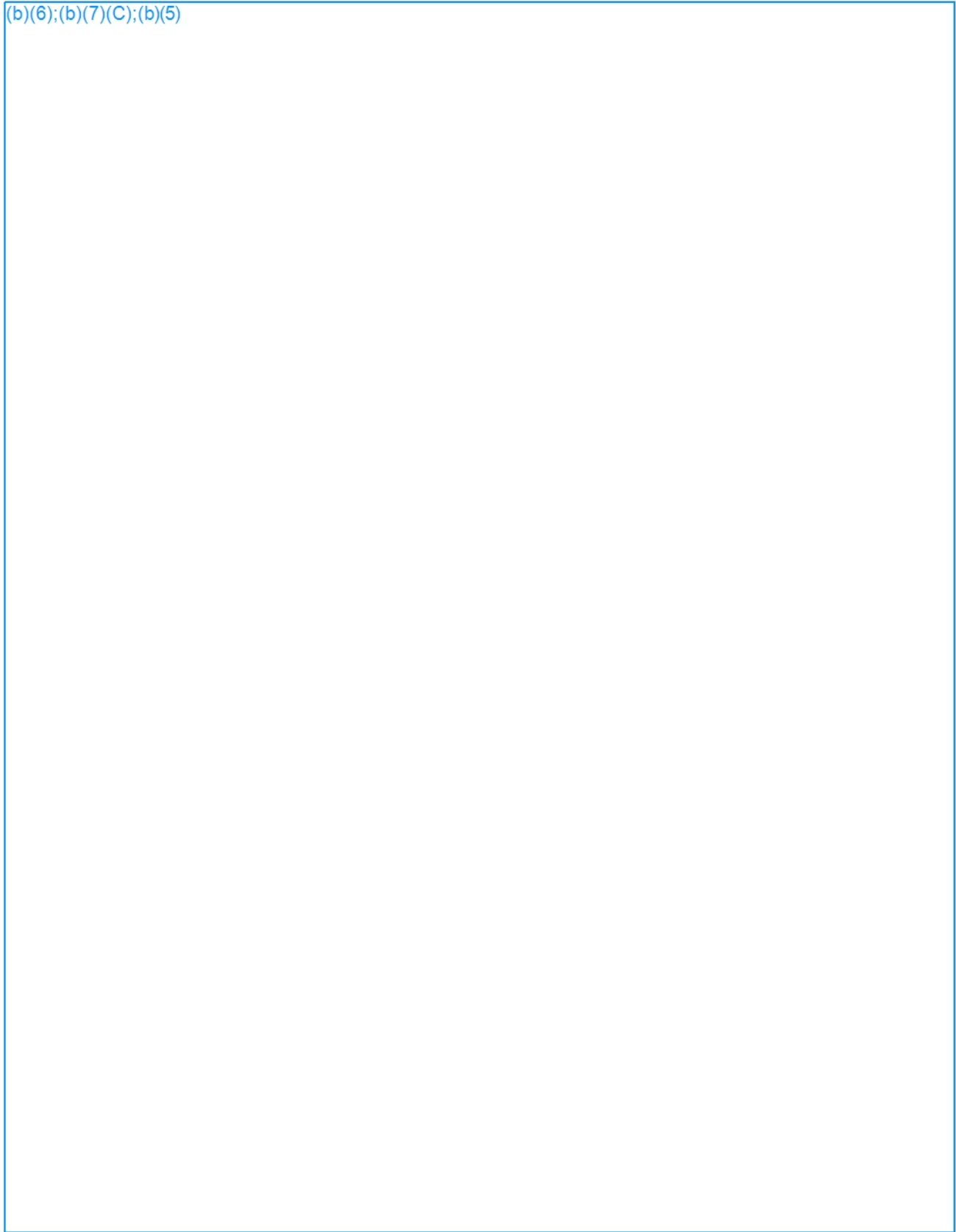


(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, DRO

FROM: Sarah L. Hartnett, Chief Counsel  
Office of Chief Counsel, Houston, Texas

Bret A. Bradford, (A) Field Office Director  
Enforcement and Removal Operations, Field Office Houston,  
Texas

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



MEMORANDUM FOR: DPLA for FIELD LEGAL OPERATIONS, OPLA  
Assistant Director for Field Operations, ERO

FROM: Nelson Perez, Chief Counsel  
Office of Chief Counsel, Miami

Marc J. Moore, Field Office Director  
Enforcement and Removal Operations, Field Office Miami

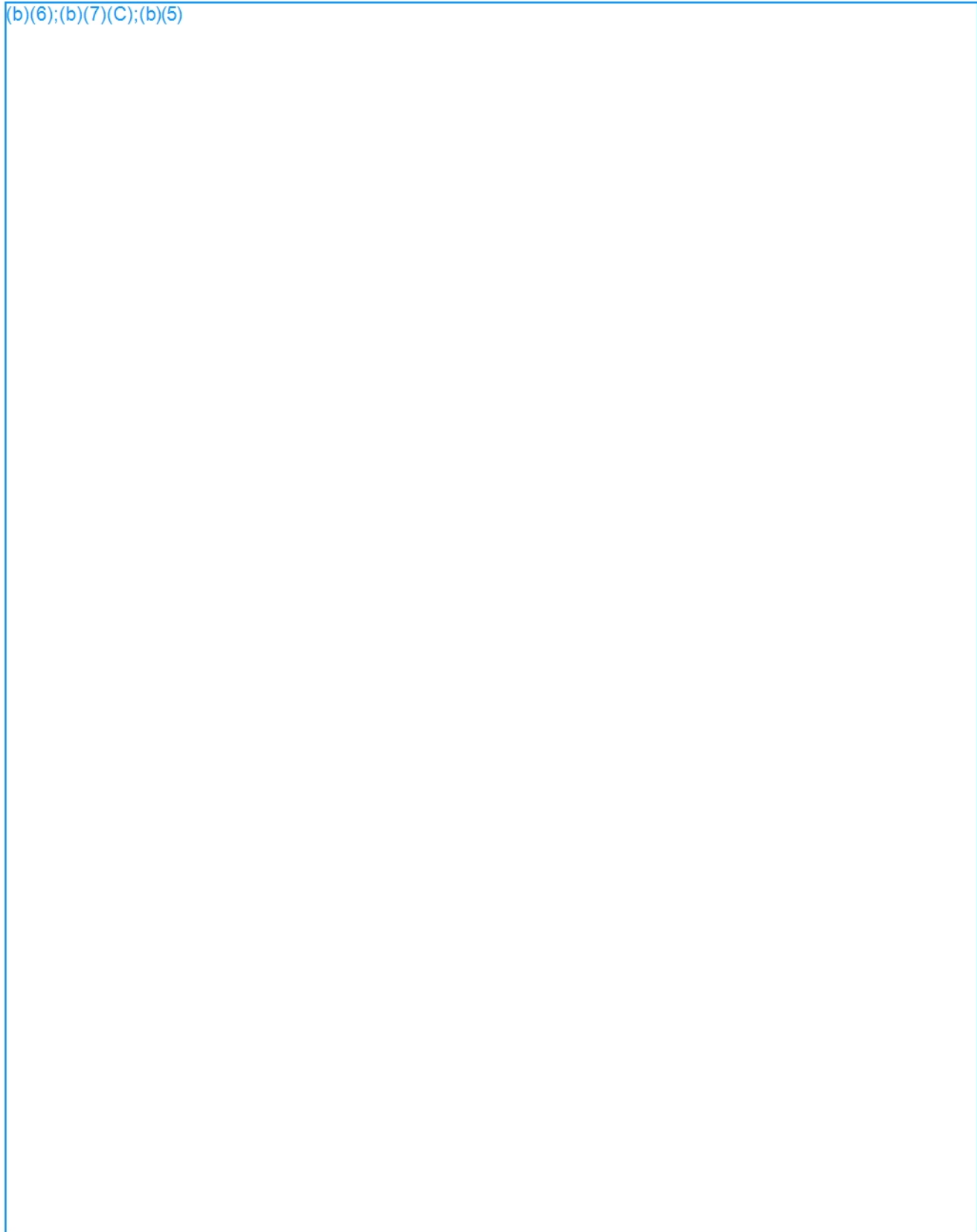
SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

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(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C)

(b)(6);(b)(7)(C);(b)(5)

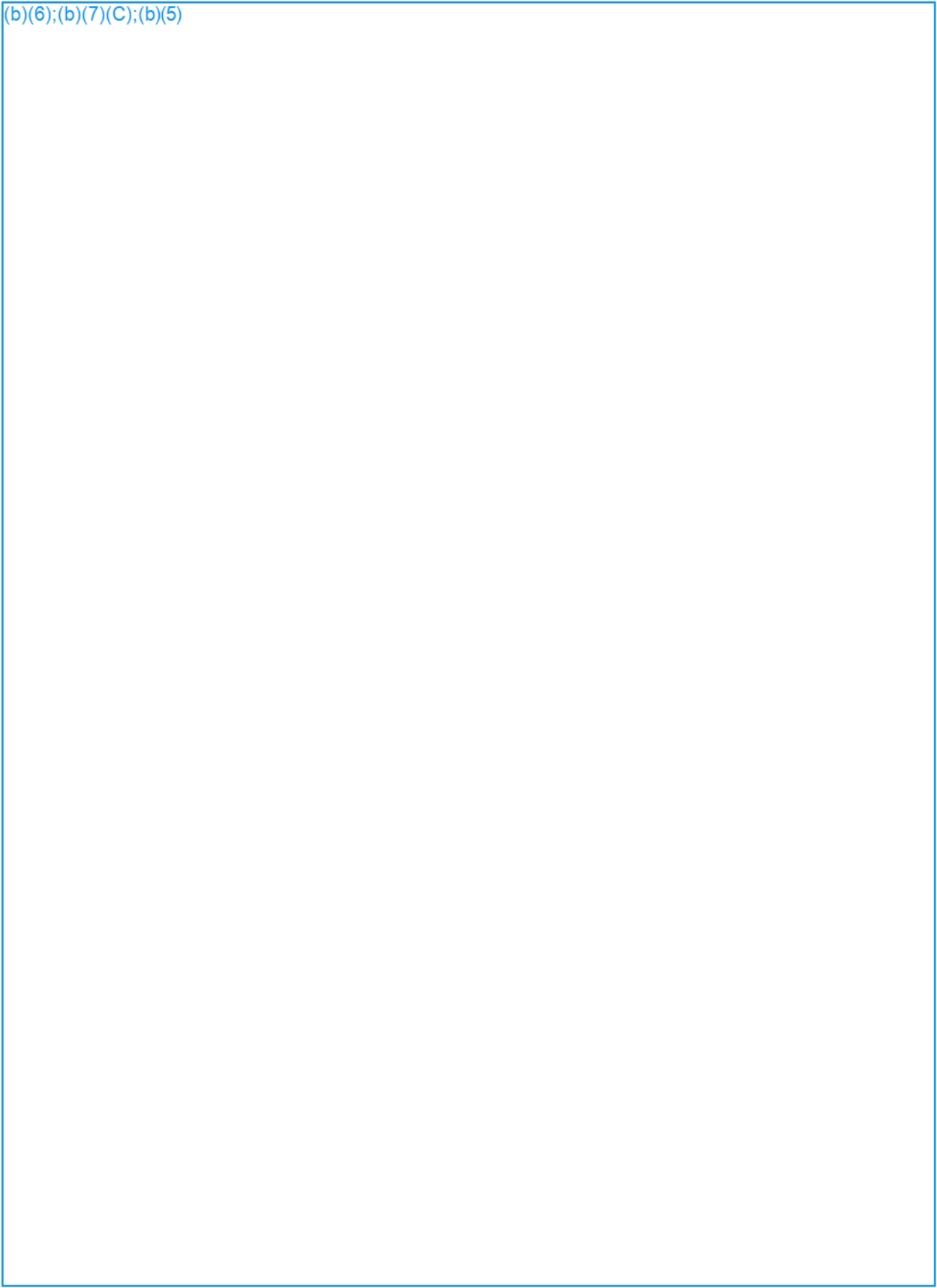


(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



## USC CLAIMS MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York City

(b)(6);(b)(7)(C) Acting Assistant Field Office Director  
Enforcement and Removal Operations, New York City

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



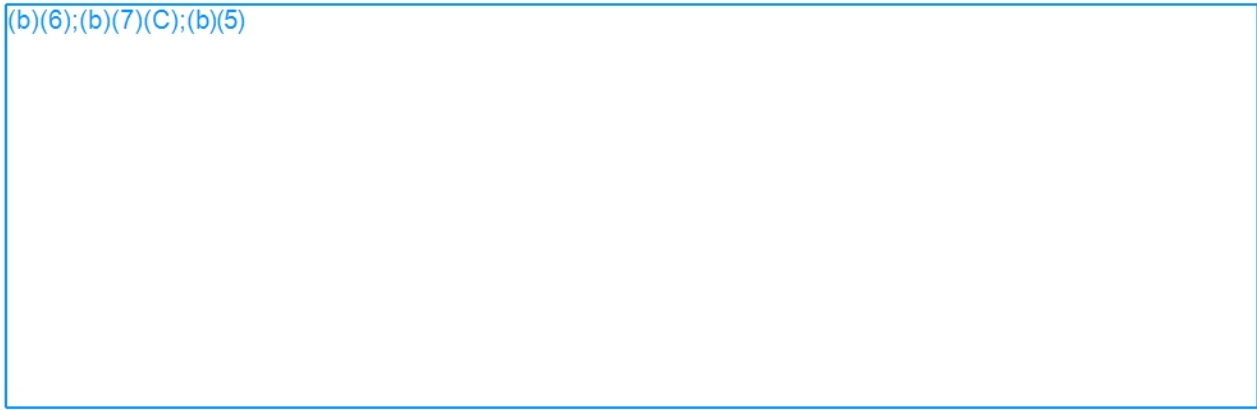
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(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)





**U.S. Department of Homeland Security**  
U.S. Immigration and Customs Enforcement  
15 Governor Drive  
Newburgh, New York 12550  
*Phone: (845) 831-1576, ext. 2148/2149*

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Office of the Chief Counsel

June 1, 2017

The Honorable Roger Sagerman  
EOIR – Immigration Court  
c/o Ulster Correctional Facility  
P.O. Box 800, Berne Road  
Napanoch, New York 12458

Re: (b)(6);(b)(7)(C)  
(IHP) Ulster Correctional Facility

Dear Judge Sagerman:

The enclosed documents are being offered by the U.S. Department of Homeland Security, Immigration and Customs Enforcement, as evidence in the above referenced removal proceedings to be held at the Ulster Correctional Facility in Napanoch, New York on June 16, 2017.

- 1) Form G-166C, Investigative Statement
- 2) Respondent's Birth Certificate
- 3) Marriage Certificate pertaining to respondent's father
- 4) N-400, Application to File Petition for Naturalization pertaining to respondent's father

Respectfully submitted,

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(b)(6);(b)(7)(C)

Assistant Chief Counsel



**CERTIFICATE OF SERVICE**

**CASE NAME:**

(b)(6);(b)(7)(C)

**A Number:**

I HEREBY CERTIFY that on June 1, 2017, I caused to be served the foregoing document(s):

  X   by placing a true and correct copy thereof in a sealed envelope, with postage thereon to be fully prepaid by normal government process, and causing the same to be mailed by first class mail to the person at the address set forth below:

\_\_\_\_\_ by causing to be personally delivered a true and correct copy thereof to the person at the address set forth below:

\_\_\_\_\_ by causing to be personally delivered a true and correct copy thereof by Federal Express / United Parcel Service to the person at the address set forth below:

\_\_\_\_\_ by telefaxing, with acknowledgment of receipt requested, a true and correct copy thereof to the person at the address set forth below:

Prisoners' Legal Services of New York

Attn: (b)(6);(b)(7)(C) Esq.

41 State Street, Suite (b)(6);(b)(7)(C)

Albany, NY 12207

\_\_\_\_\_  
(b)(6);(b)(7)(C)

Assistant Chief Counsel

February 17, 2017

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Melody A. Brukiewa, Chief Counsel  
Office of Chief Counsel, Phoenix

Enrique M. Lucero, Field Office Director  
Enforcement and Removal Operations,  
Phoenix Field Office

Reviewed by: Senior Attorney, (b)(6);(b)(7)(C)  
Florence, Arizona

Author: Assistant Chief Counsel (b)(6);(b)(7)(C)  
Tucson, Arizona

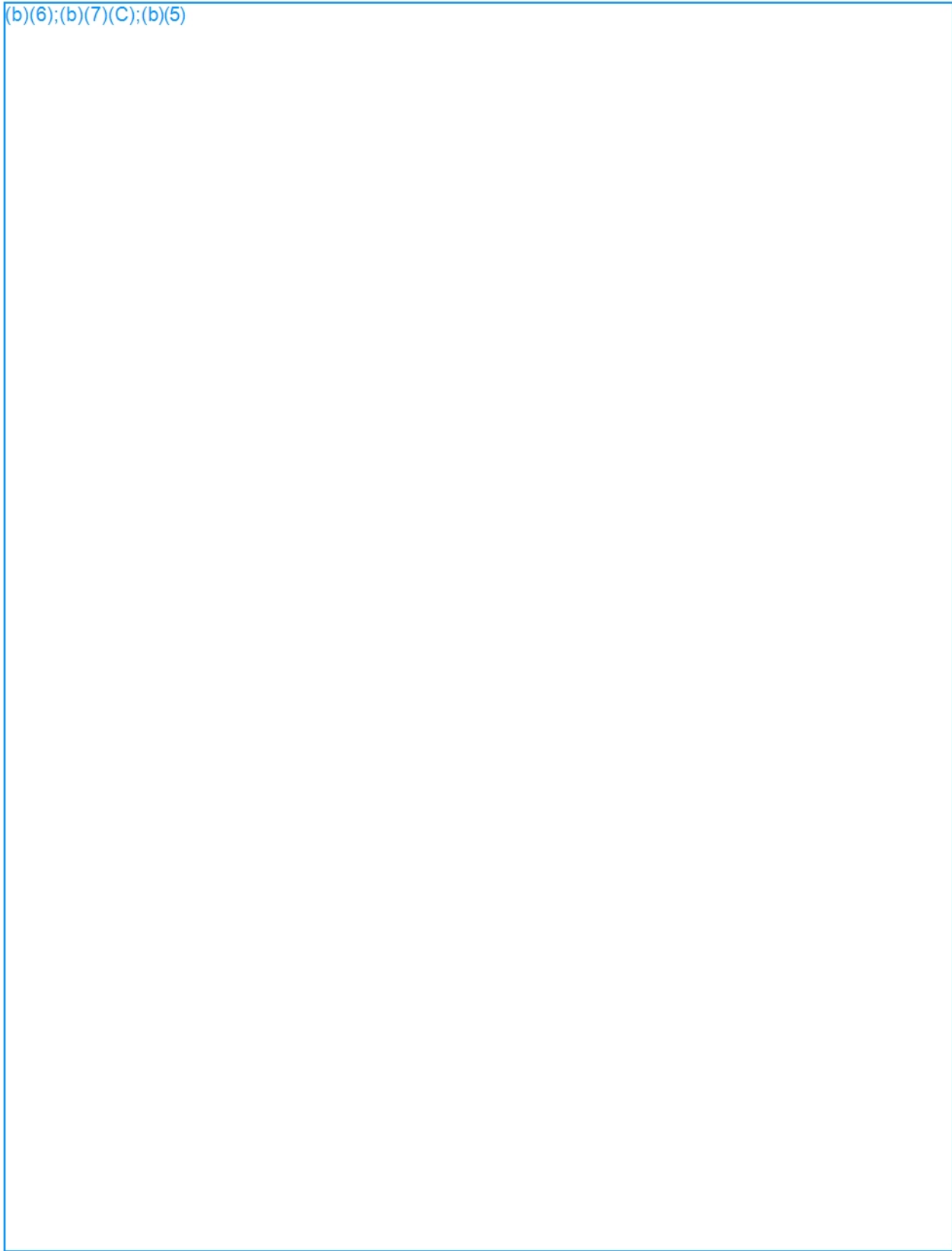
SUBJECT: Claim to United States Citizenship  
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STATEMENT OF THE CASE

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(b)(6);(b)(7)(C);(b)(5)

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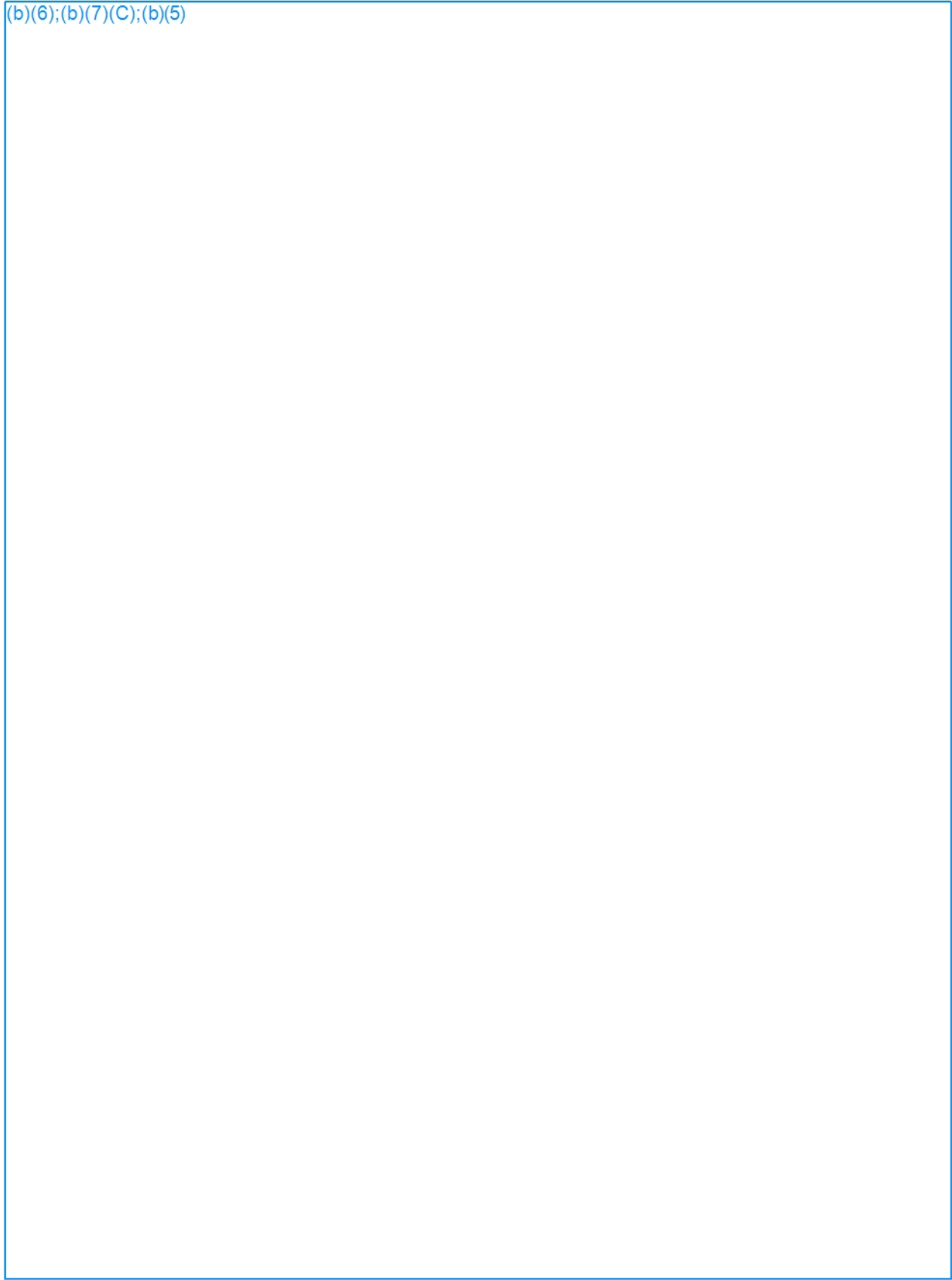


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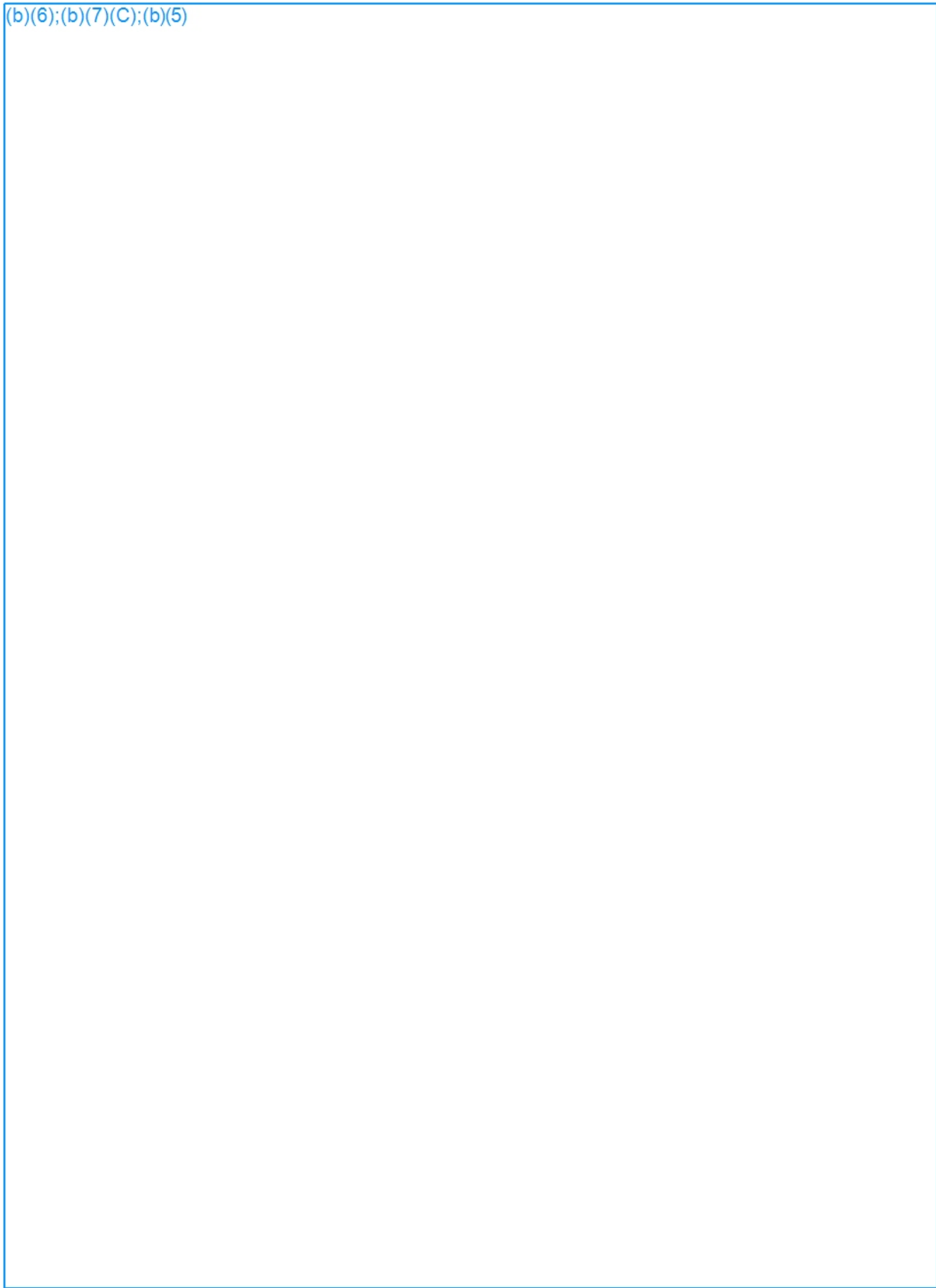
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(b)(6);(b)(7)(C);(b)(5)





(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(5)



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Page 4671

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Page 4673

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Page 4674

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WIF Draft;(b)(5)

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Page 4675

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of the Freedom of Information and Privacy Act

MEMORANDUM FOR: DEPUTY PRINCIPAL LEGAL ADVISOR FOR  
FIELD LEGAL OPERATIONS, OPLA  
ASSISTANT DIRECTOR FOR FIELD OPERATIONS, ERO

FROM: Catherine Pincheck, Chief Counsel, DET, OPLA  
Rebecca J. Adducci, Field Office Director, DET, ERO

SUBJECT: Claim to United States Citizenship

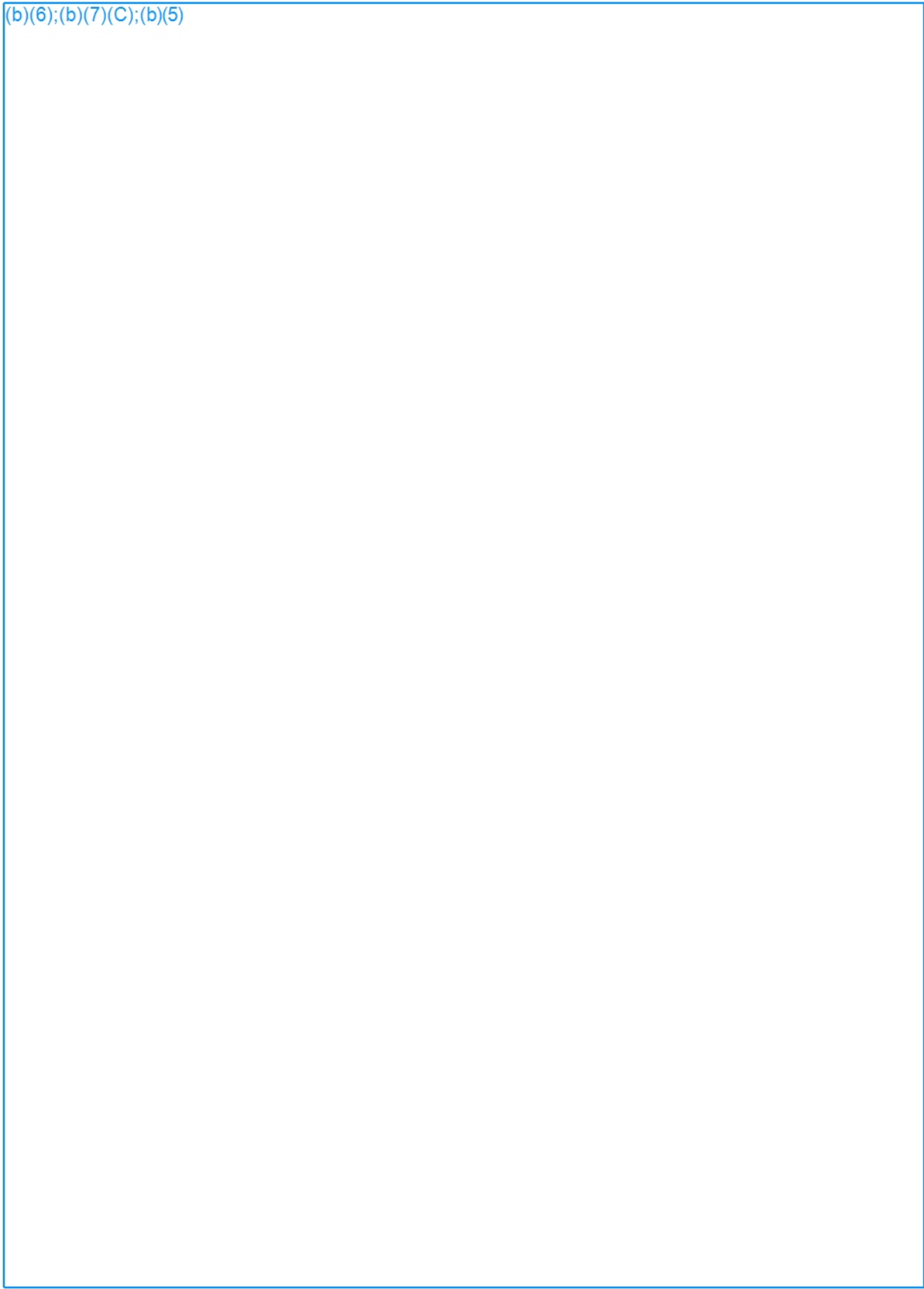
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STATEMENT OF THE CASE

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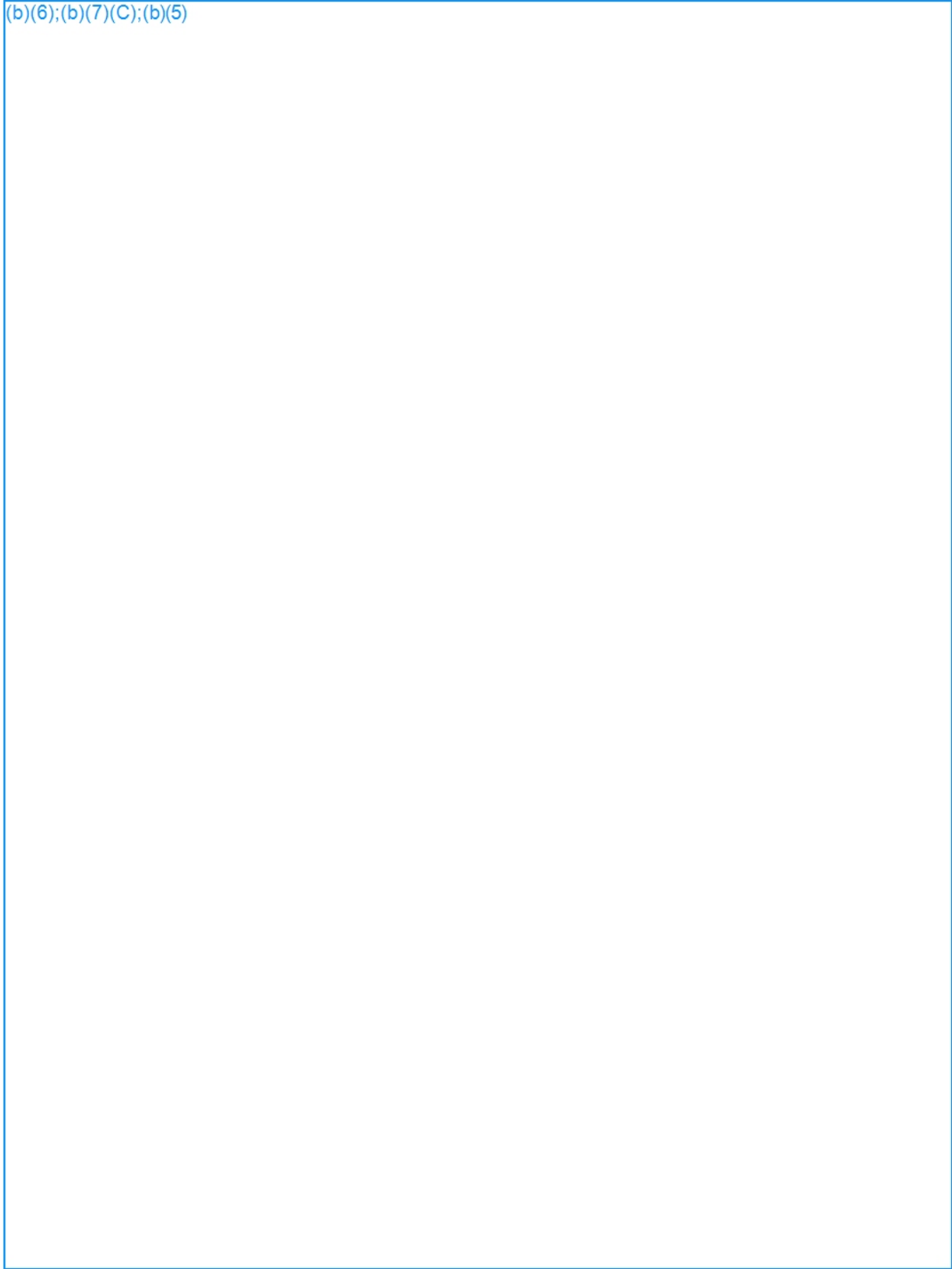
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(b)(5)



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Page 4686

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Page 4687

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Page 4688

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of the Freedom of Information and Privacy Act

Page 4690

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act



**UPDATED USC CLAIM MEMORANDUM**

MEMORANDUM FOR: Director of Field Legal Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Jo Ann McLane, Chief Counsel  
Office of the Chief Counsel, San Antonio, Texas

Daniel Bible, Field Office Director  
Enforcement and Removal Operations, Field Office San  
Antonio, Texas

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(5)





## USC CLAIMS MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York City

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, New York City

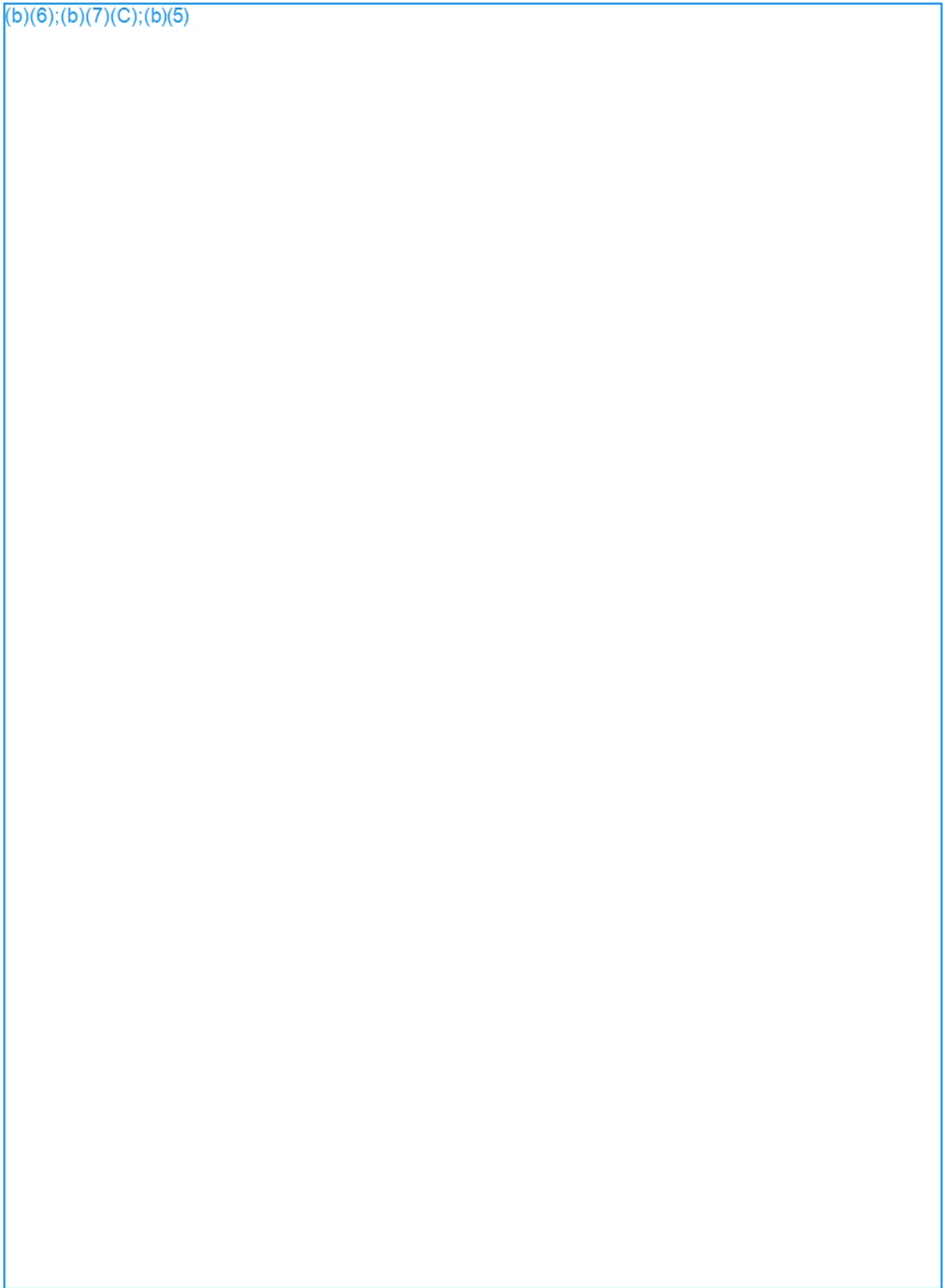
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### STATEMENT OF THE CASE

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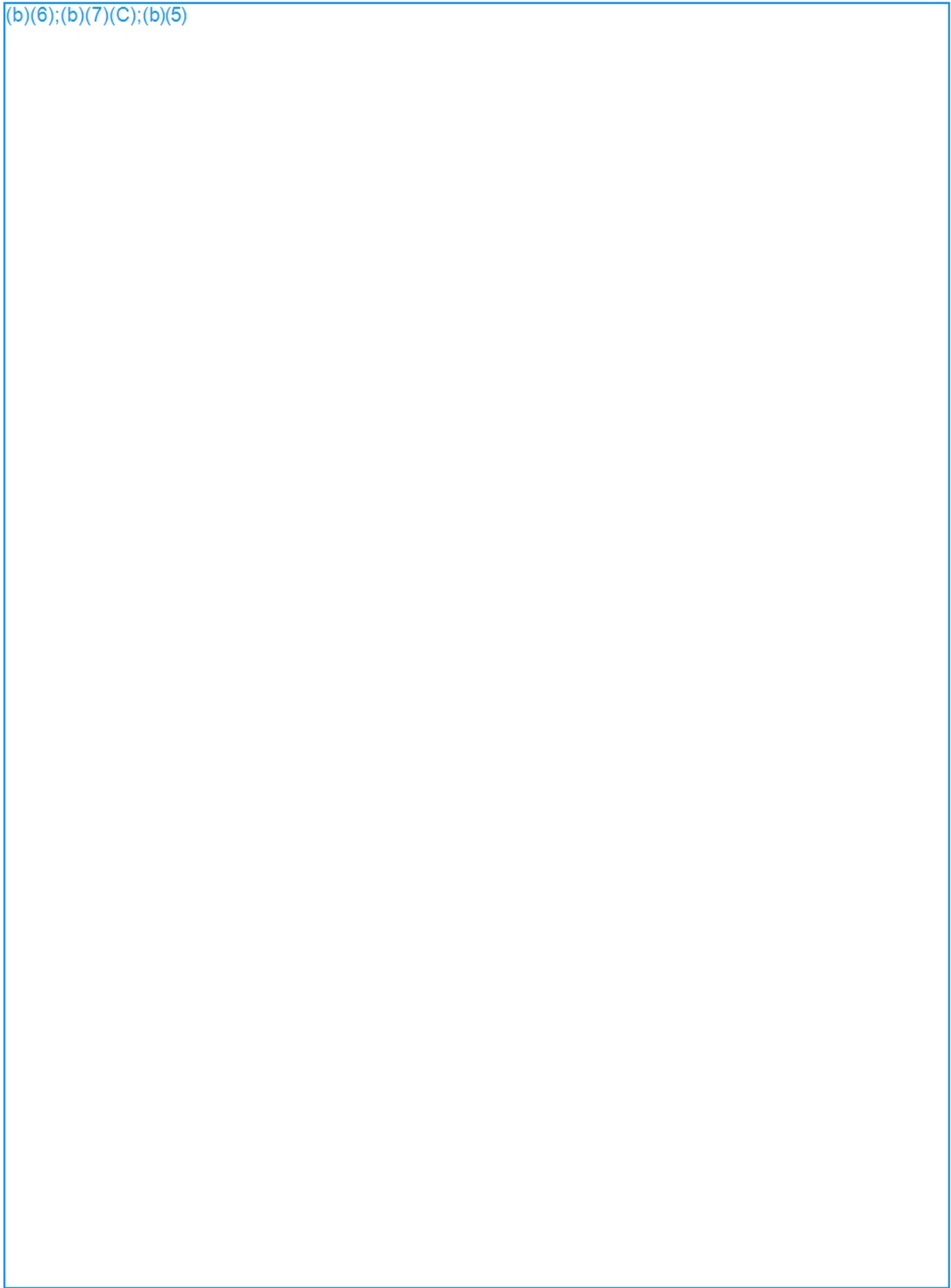
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(b)(6);(b)(7)(C);(b)(5)



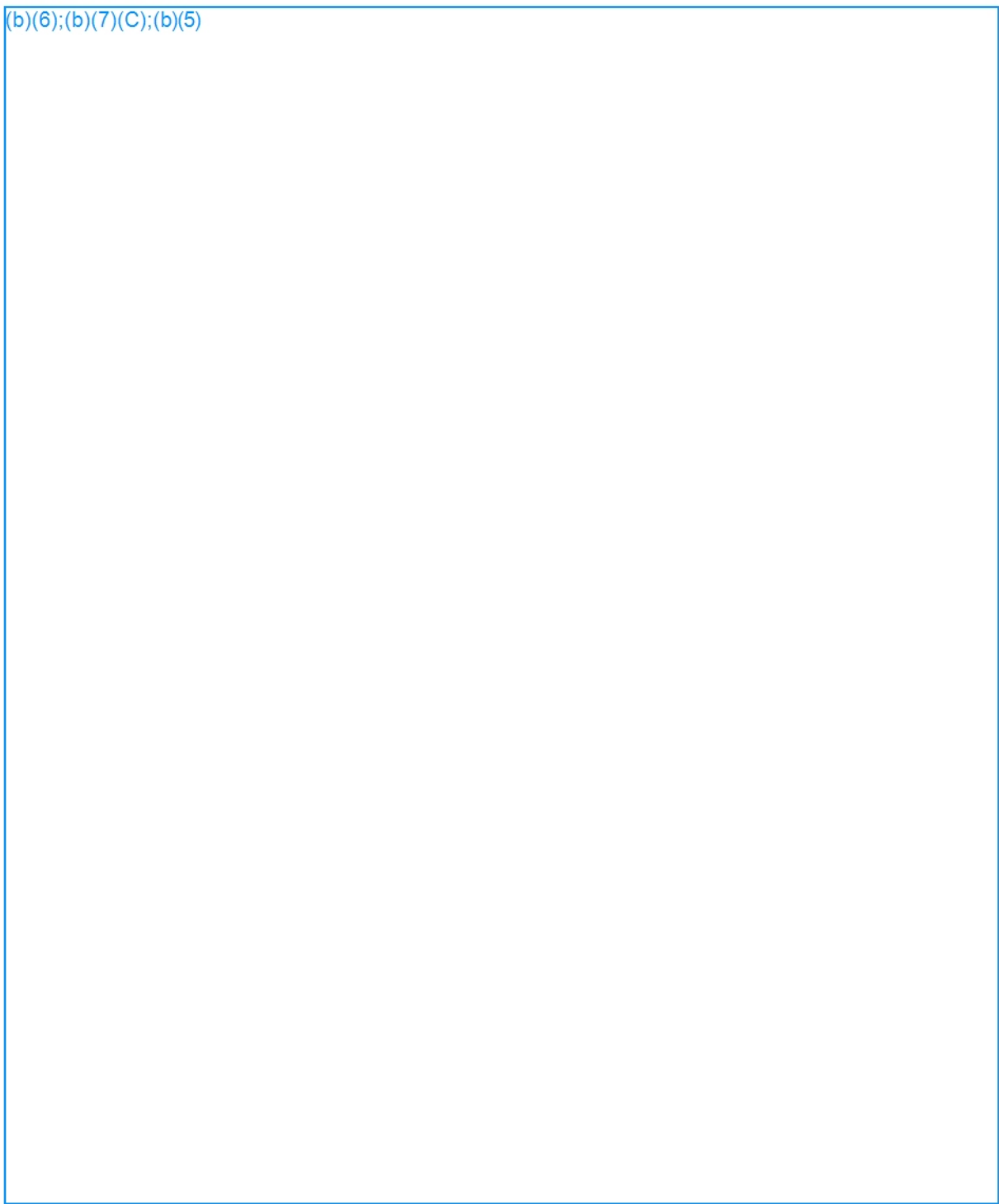
(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)





**U.S. Immigration  
and Customs  
Enforcement**

*Office of Enforcement and Removal Operations*  
**U.S. Department of Homeland Security**  
606 S. Olive St., Suite 800  
Los Angeles, CA 90014

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

DATE: February 17, 2017

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: David Marin, Field Office Director  
Enforcement and Removal Operations, Field Office, Los Angeles, CA

(b)(6);(b)(7)(C) Deputy Chief Counsel  
Office of the Chief Counsel, Los Angeles

(b)(6);(b)(7)(C) Assistant Chief Counsel  
Office of the Chief Counsel, Los Angeles

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

Page 4712

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

Page 4713

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

Page 4714

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act



Page 4715

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of the Freedom of Information and Privacy Act

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of the Freedom of Information and Privacy Act

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of the Freedom of Information and Privacy Act

Page 4718

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

## USC CLAIMS MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York City

(b)(6);(b)(7)(C) Acting Assistant Field Office Director  
Enforcement and Removal Operations, New York City

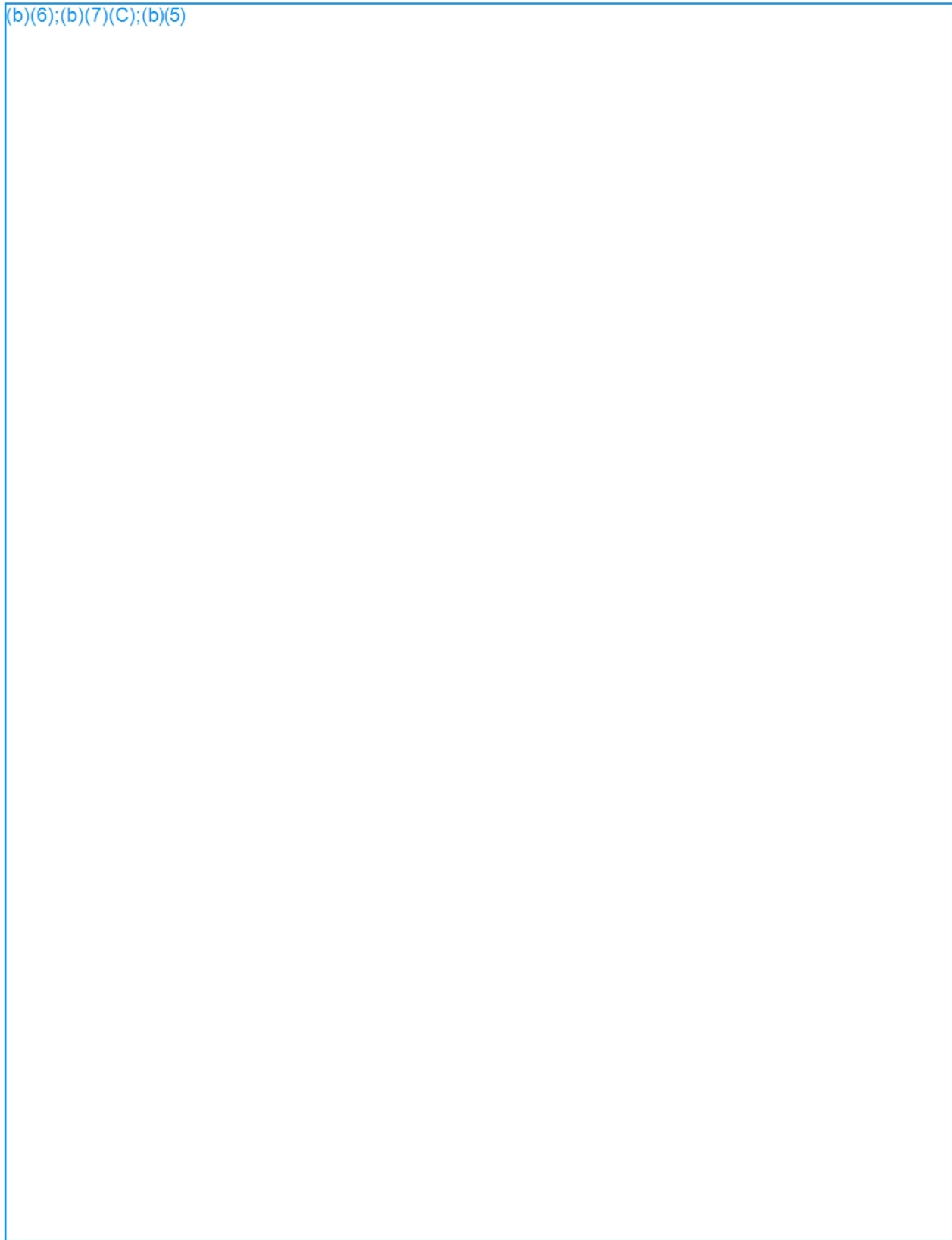
SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

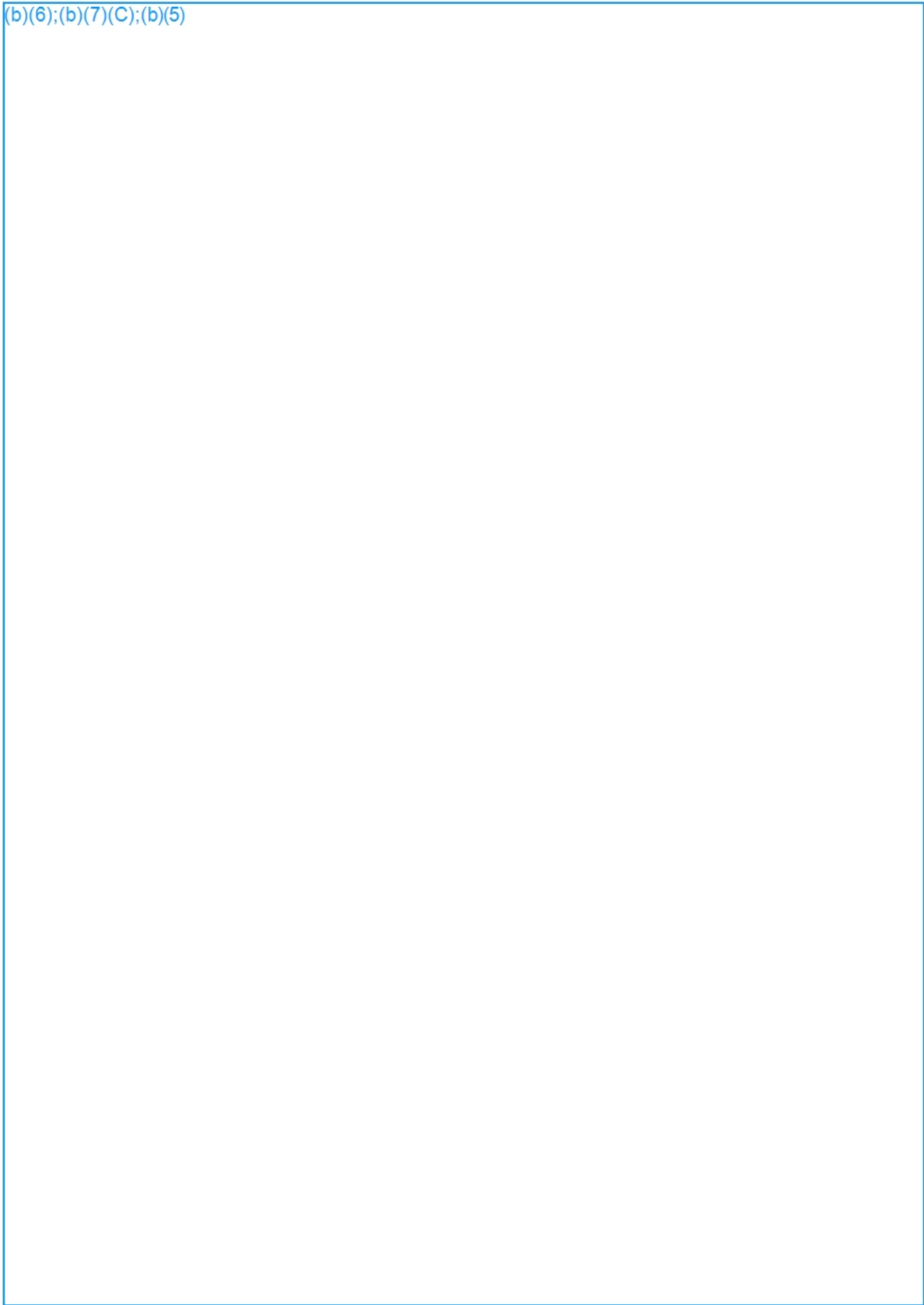
(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)



U.S. Immigration  
and Customs  
Enforcement

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

May 11, 2017

MEMORANDUM FOR: Deputy Principal Legal Advisor for Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Karen E. Lundgren, Chief Counsel  
Office of Chief Counsel, Chicago

Ricardo Wong, Field Office Director  
Enforcement and Removal Operations, Field Office Chicago

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



Page 4731

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

Page 4732

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of the Freedom of Information and Privacy Act

Page 4733

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

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of the Freedom of Information and Privacy Act

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of the Freedom of Information and Privacy Act

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of the Freedom of Information and Privacy Act

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act



**U.S. Immigration  
and Customs  
Enforcement**

*Office of Enforcement and Removal Operations*

**U.S. Department of Homeland Security**  
300 N. Los Angeles Street  
Los Angeles, CA 90012

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

DATE: January 19, 2017

MEMORANDUM FOR: DIRECTOR OF FIELD LEGAL OPERATIONS, OPLA  
ASSISTANT DIRECTOR FOR FIELD OPERATIONS, ERO

FROM: (b)(6);(b)(7)(C)  
Acting Field Office Director, Los Angeles, CA

(b)(6);(b)(7)(C)  
Deputy Chief Counsel

(b)(6);(b)(7)(C)  
Assistant Chief Counsel

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C)

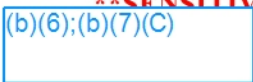
(b)(6);(b)(7)(C)

(b)(6);(b)(7)(C)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C)

*Office of the Chief Counsel*  
U.S. Department of Homeland Security

18201 S.W. 12<sup>th</sup> Street  
Miami, Florida 33194



U.S. Immigration and  
Customs Enforcement

April 2, 2017

MEMORANDUM FOR: DPLA for FIELD LEGAL OPERATIONS, OPLA  
ASSISTANT DIRECTOR FOR FIELD OPERATIONS, ERO

FROM: Nelson Perez  
Chief Counsel  
Office of Chief Counsel, Miami

Marc J. Moore,  
Field Office Director  
Enforcement and Removal Operations, Field Office Miami

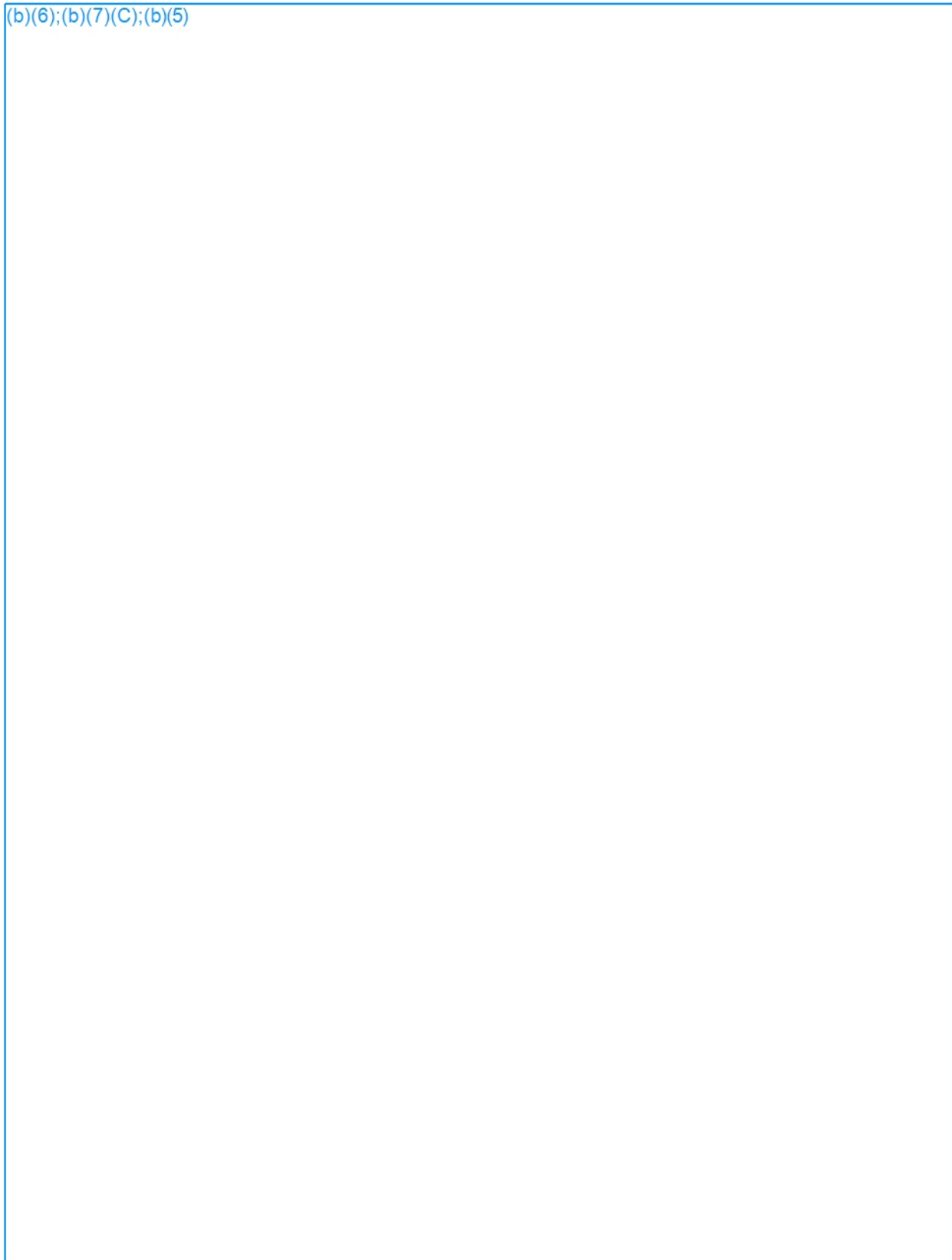
SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



# U.S. Immigration and Customs Enforcement

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

DATE: May 4, 2017

MEMORANDUM FOR: DIRECTOR OF FIELD LEGAL OPERATIONS, OPLA  
ASSISTANT DIRECTOR FOR FIELD OPERATIONS, ERO

FROM: David A. Marin, Field Office Director  
Enforcement and Removal Operations, Los Angeles, CA

Sandra D. Anderson, Chief Counsel  
Office of the Chief Counsel, Los Angeles, CA

(b)(6);(b)(7)(C) Deputy Chief Counsel  
Office of the Chief Counsel, Adelanto, CA

(b)(6);(b)(7)(C) Assistant Chief Counsel  
Office of the Chief Counsel, Los Angeles, CA

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

## STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



Page 4755

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

Page 4757

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

*Office of the Chief Counsel, Denver*

**U.S. Department of Homeland Security**  
12445 East Caley Avenue  
Centennial, CO 80111-6432



**U.S. Immigration and Customs Enforcement**

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Corina E. Almeida, Chief Counsel  
Office of Chief Counsel, Denver

John Longshore, Field Office Director  
Enforcement and Removal Operations, Field Office Denver

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

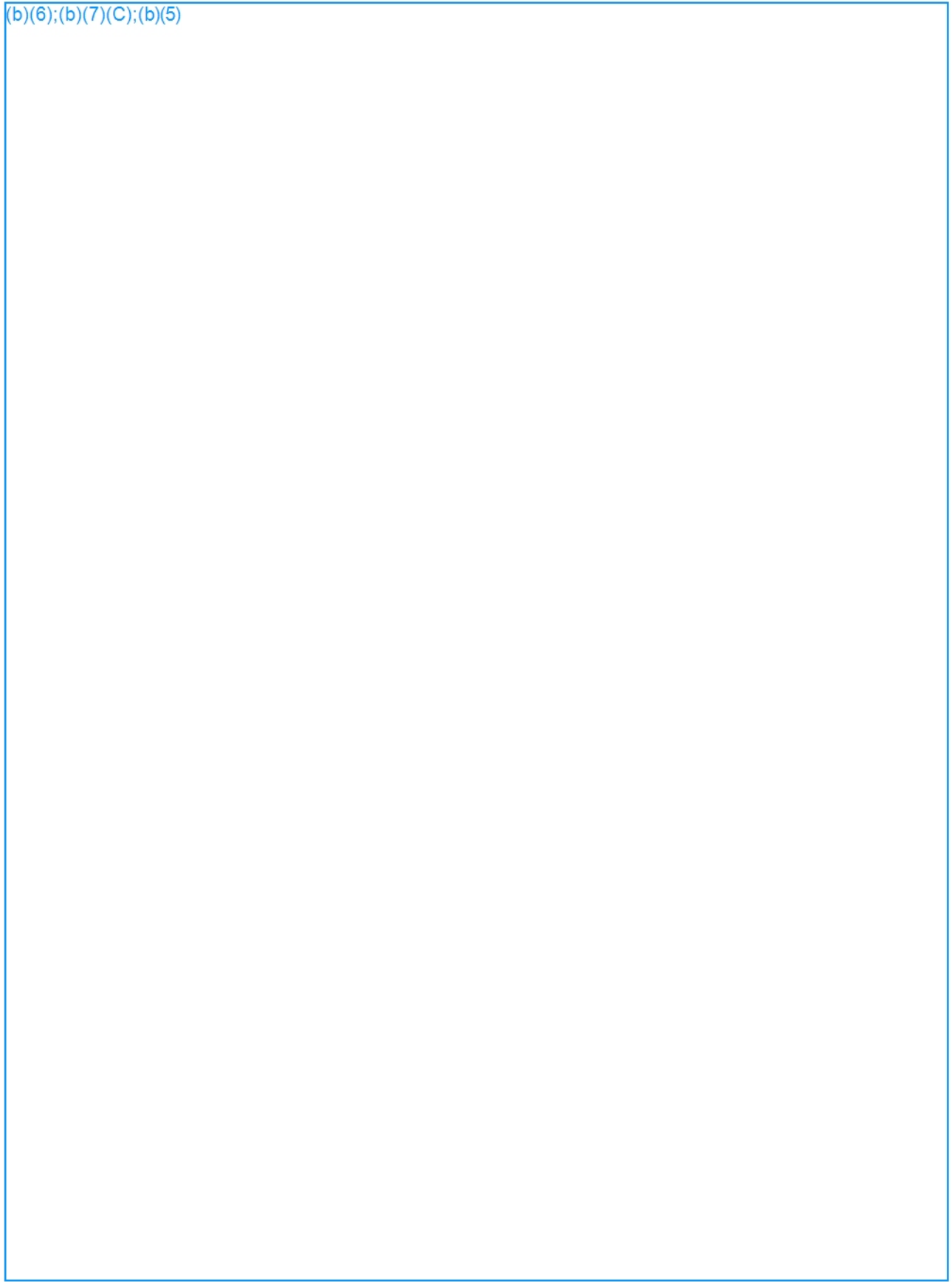
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(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

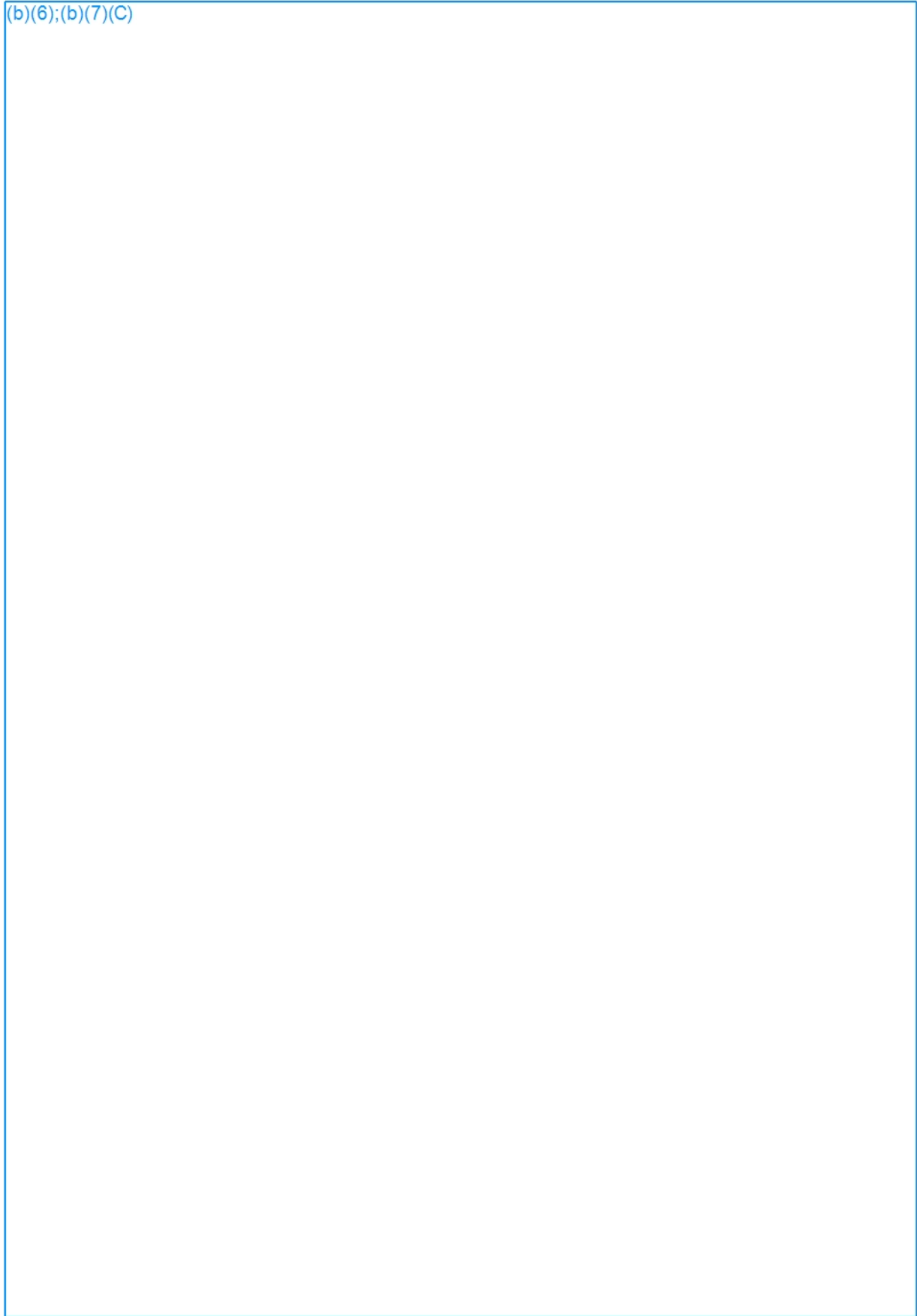
(b)(6);(b)(7)(C);(b)(5)

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(b)(6);(b)(7)(C)



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of the Freedom of Information and Privacy Act

Page 4766

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

*Office of the Chief Counsel*  
U.S. Department of Homeland Security

18201 S.W. 12<sup>th</sup> Street  
Miami, Florida 33194



U.S. Immigration and  
Customs Enforcement

May 15, 2017

MEMORANDUM FOR: DPLA for Field Legal Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Nelson Perez  
Chief Counsel  
Office of Chief Counsel, Miami

Marc J. Moore  
Field Office Director  
ERO Miami Field Office

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

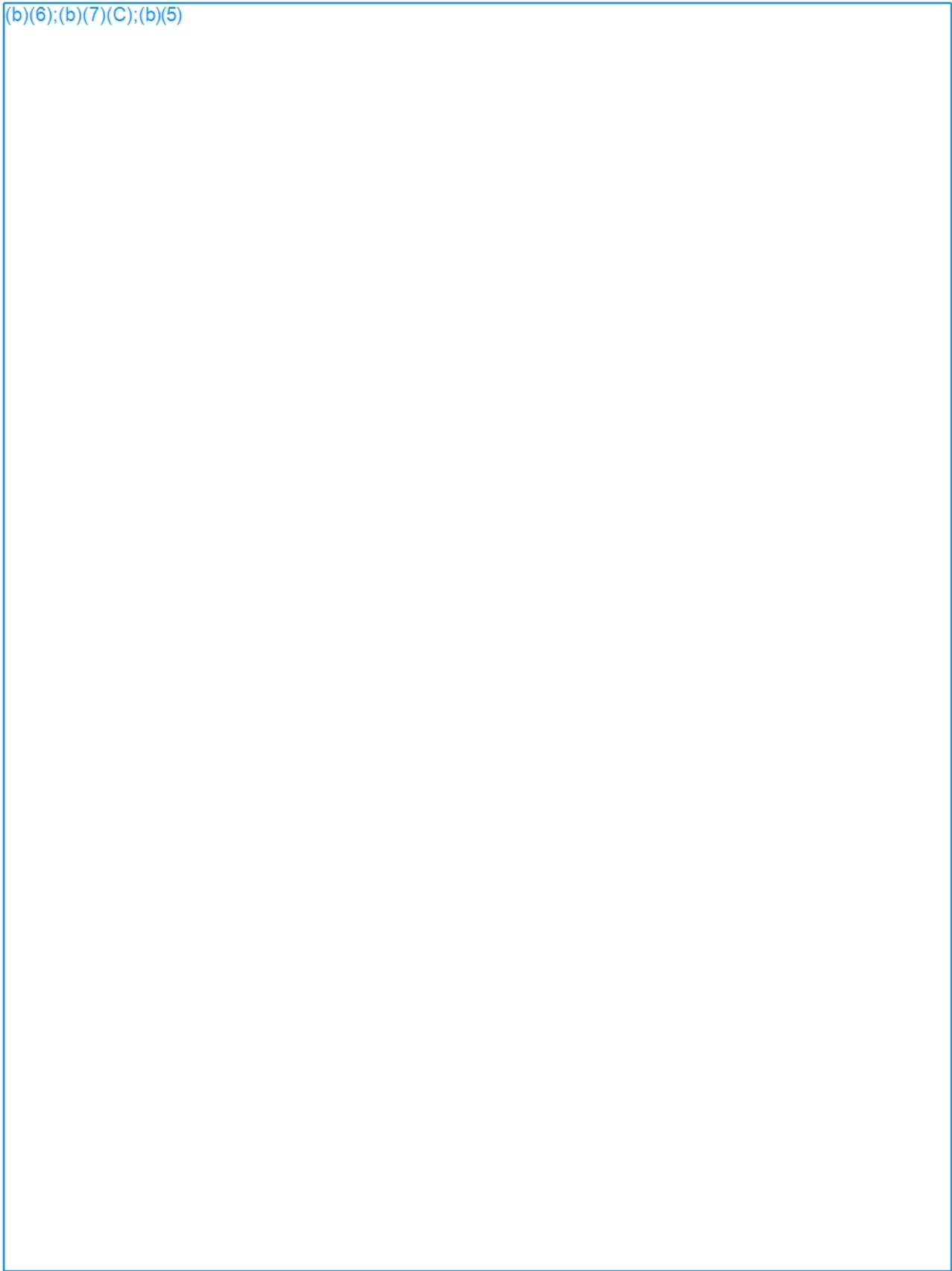
(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)



Page 4774

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

Page 4775

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

Page 4776

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act



U.S. Immigration  
and Customs  
Enforcement

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

May 11, 2017

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Karen E. Lundgren, Chief Counsel  
Office of Chief Counsel, Chicago

Ricardo Wong, Field Office Director  
Enforcement and Removal Operations, Field Office Chicago

SUBJECT: Claim to United States Citizenship

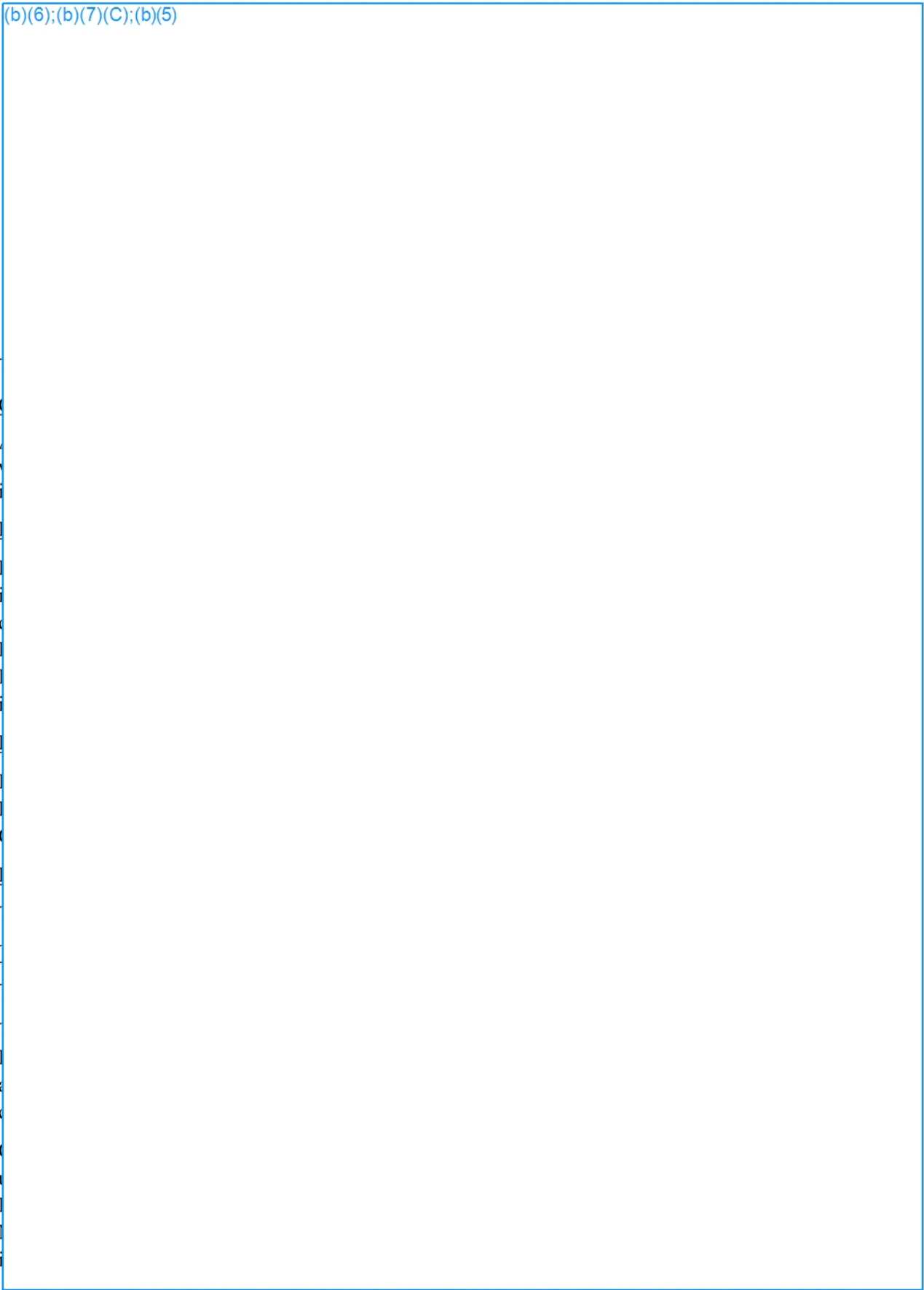
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

(b)(6);(b)(7)(C);(b)(5)





(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

MEMORANDUM FOR: Director of Field Legal Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Jo Ann McLane, Chief Counsel  
Office of the Chief Counsel, San Antonio, Texas

Daniel Bible, Field Office Director  
Enforcement and Removal Operations, Field Office San  
Antonio, Texas

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

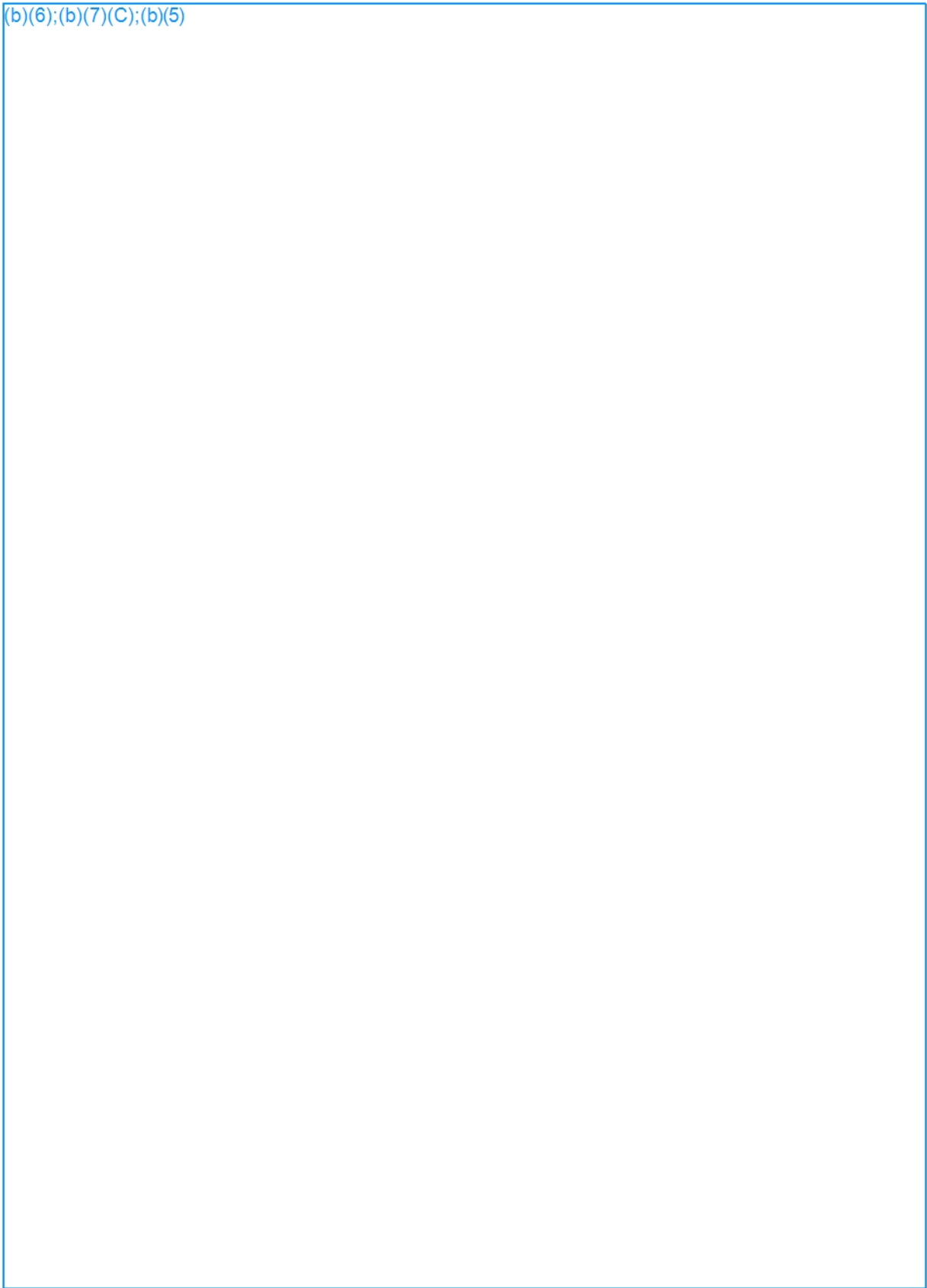
(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

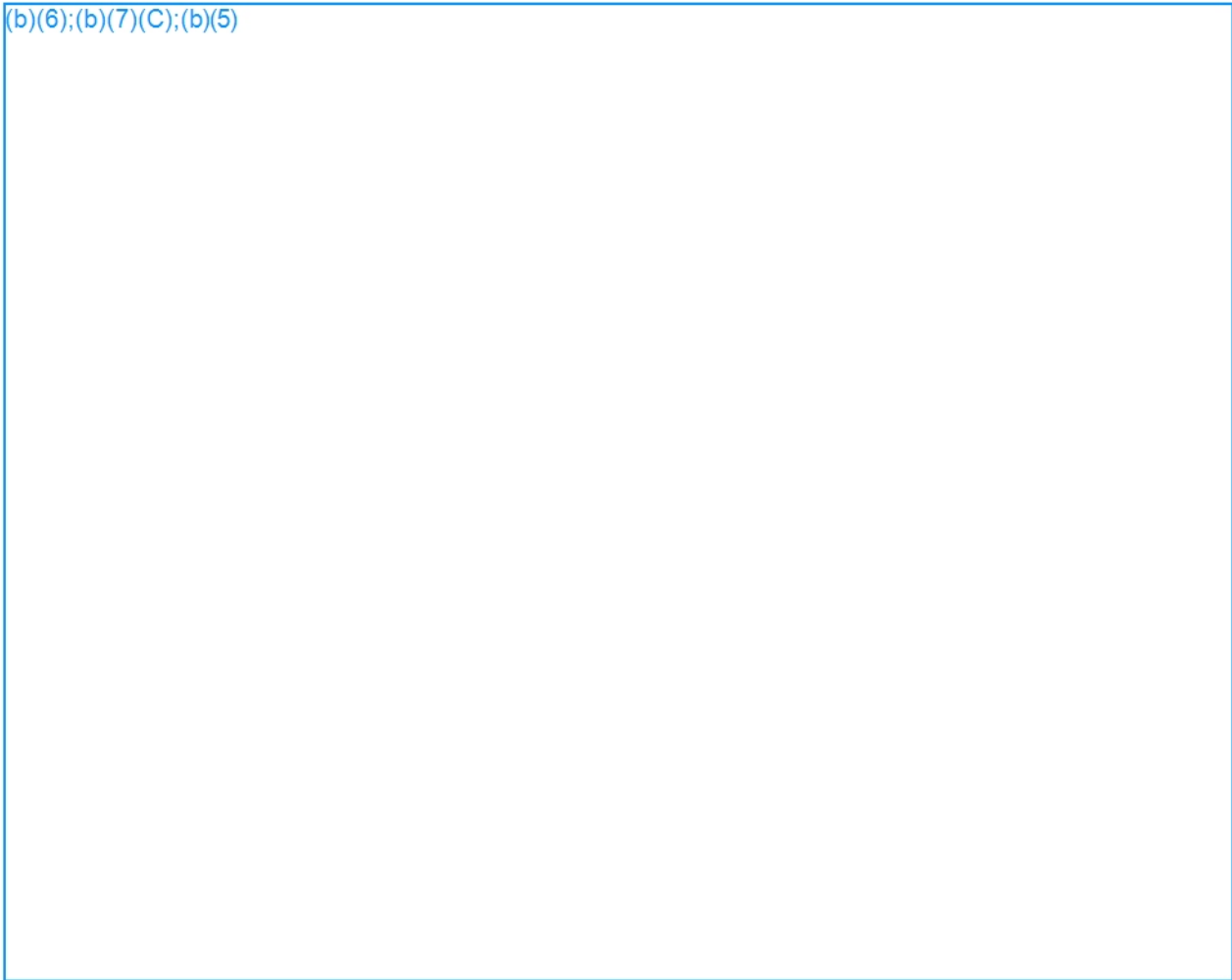
(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)





(b)(6);(b)(7)(C);(b)(5)



## USC CLAIMS MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York City

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, New York City

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

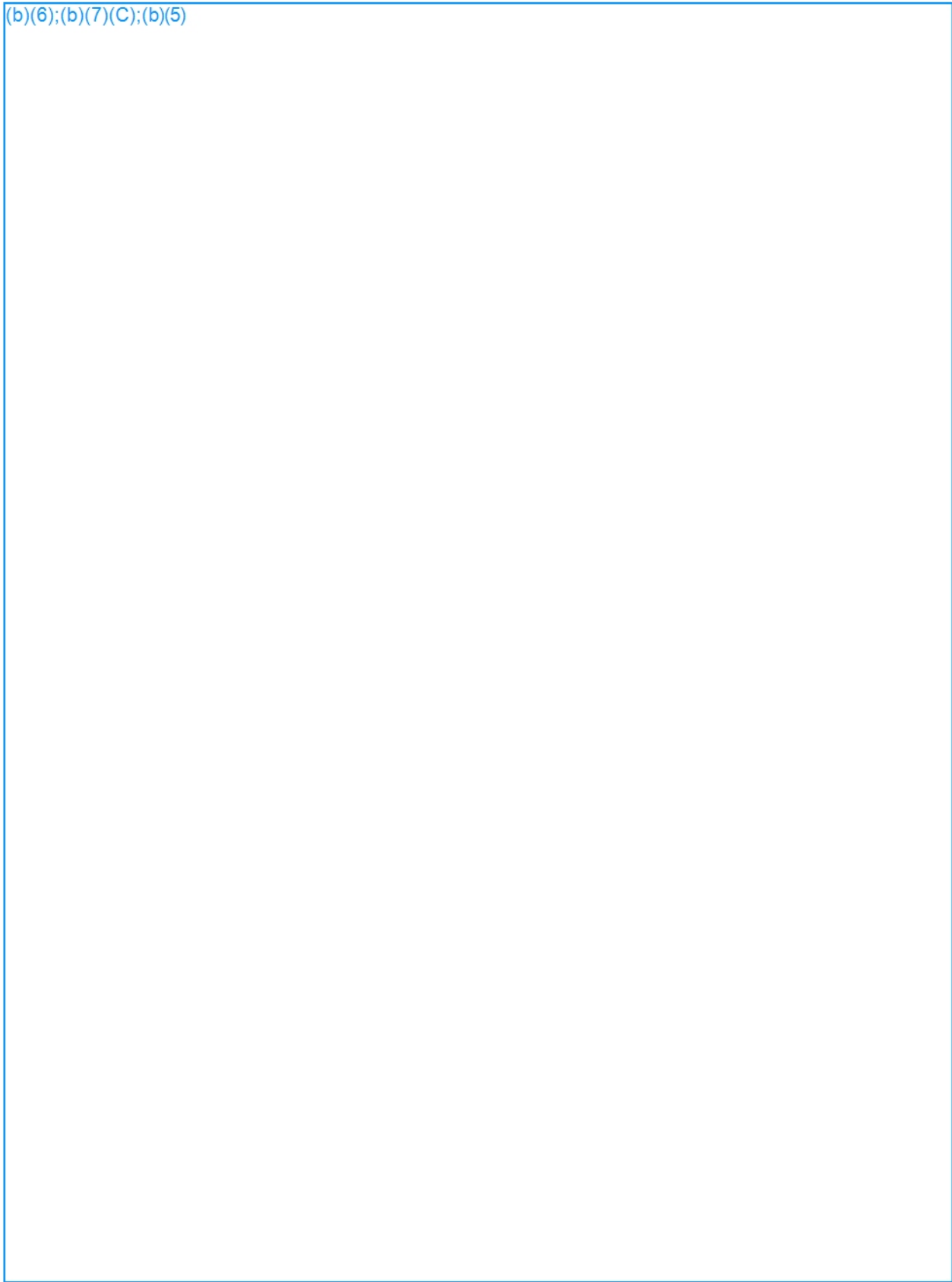
(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

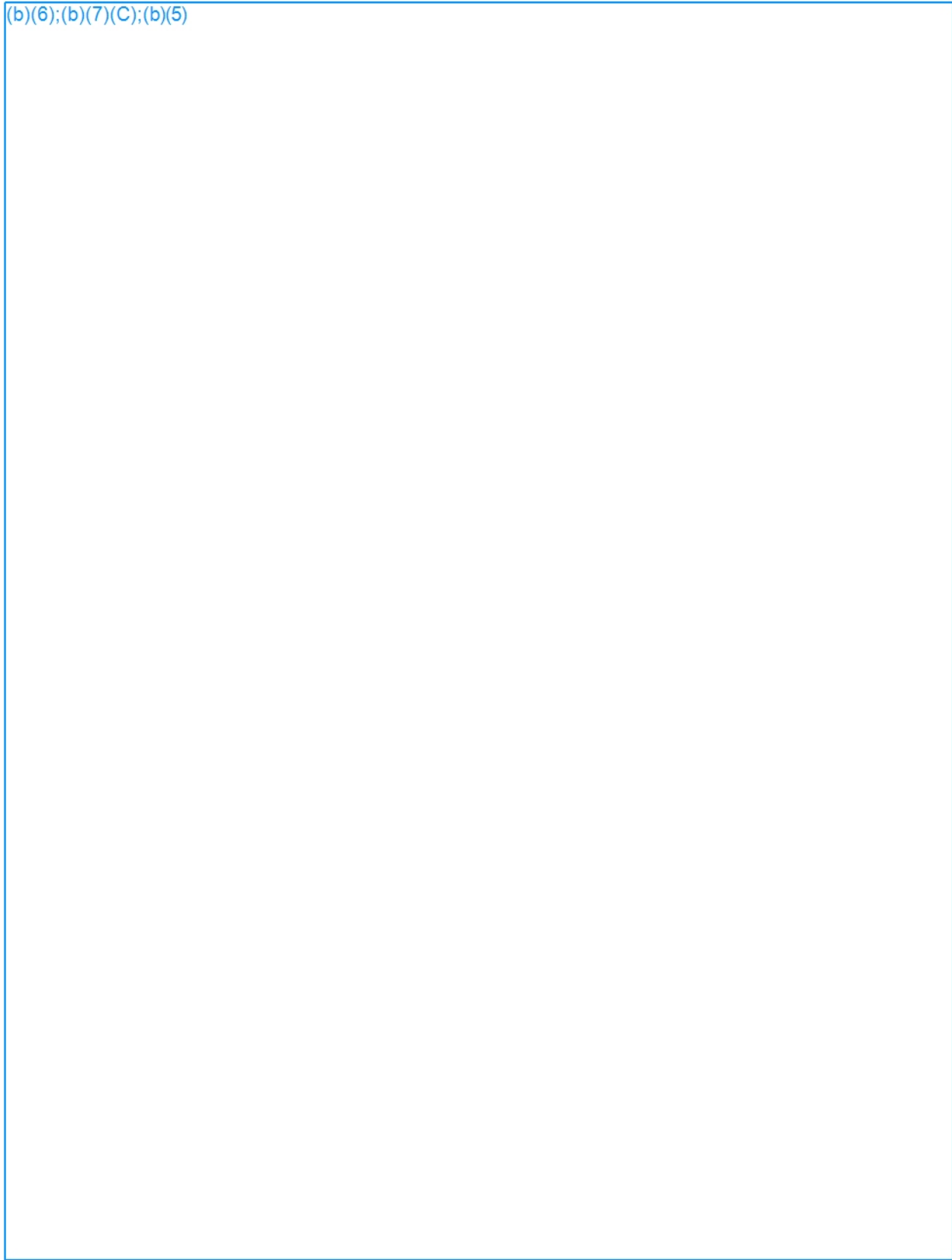
(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

Page 4797

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(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

Page 4798

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(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

Page 4799

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(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

Page 4800

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(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

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(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

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(b)(5);WIF Draft

of the Freedom of Information and Privacy Act



Page 4803

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(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

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(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

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(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

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of the Freedom of Information and Privacy Act

Page 4808

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of the Freedom of Information and Privacy Act

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of the Freedom of Information and Privacy Act

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of the Freedom of Information and Privacy Act



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of the Freedom of Information and Privacy Act

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of the Freedom of Information and Privacy Act

Page 4813

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

## USC CLAIMS MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York City

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, New York City

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

Wen Ting Cheng  
Chief Counsel

(b)(6);(b)(7)(C)

U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security  
26 Federal Plaza, (b)(6);(b)(7)(C)  
New York, NY 10278  
(212) 264-(b)(6);(b)(7)(C)

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
NEW YORK, NEW YORK**

\_\_\_\_\_)  
)  
In the Matter of )  
)  
(b)(6);(b)(7)(C) )  
)  
)  
In Removal Proceedings )  
)  
\_\_\_\_\_)

File No.: (b)(6);(b)(7)(C)

**Immigration Judge Mimi Tsankov**

**Next Hearing Date: December 21, 2017**

**THE DEPARTMENT’S MOTION TO DISMISS WITHOUT PREJUDICE**

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
NEW YORK, NEW YORK**

\_\_\_\_\_  
)  
)  
In the Matter of )  
)

(b)(6);(b)(7)(C)

File No.:

(b)(6);(b)(7)(C)

)  
)  
In Removal Proceedings )  
)  
\_\_\_\_\_ )

**THE DEPARTMENT’S MOTION TO DISMISS WITHOUT PREJUDICE**

The U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement (Department), moves the Immigration Judge to dismiss the instant proceedings because based upon information and belief the respondent is not in the United States. See 8 C.F.R. §§ 1239.2(c) and 239.2(a)(4). The Department asserts that any dismissal or termination pursuant to this motion is without prejudice and does not constitute a final judgment rendered on the merits of any issue in these proceedings. *See generally* 8 C.F.R. § 1239.2(c) (providing that dismissal “shall be without prejudice to the alien or the Department of Homeland Security”).

Based upon the forgoing, the Department requests that the Immigration Judge grant this motion to dismiss without prejudice. Attached, for the Immigration Judge’s convenience is a proposed order relating to this motion.

Respectfully submitted,

Dated: \_\_\_\_\_

\_\_\_\_\_  
(b)(6);(b)(7)(C)  
Deputy Chief Counsel  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security  
26 Federal Plaza, (b)(6);(b)(7)(C)  
New York, NY 10278  
212-264-(b)(6);(b)(7)(C)

**CERTIFICATE OF SERVICE**

I, (b)(6);(b)(7)(C) hereby certify that on May 3, 2017, I caused to be served by first-class mail a true and correct copy of the attached motion upon the respondent by placing such copy in my office's outgoing mail system in an envelope duly addressed as follows:

(b)(6);(b)(7)(C)

Southampton, NY 11968

(b)(6);(b)(7)(C) \_\_\_\_\_

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
NEW YORK, NEW YORK**

**In the Matter of:**

(b)(6);(b)(7)(C)

**File No.:**

(b)(6);(b)(7)(C)

**ORDER OF THE IMMIGRATION JUDGE**

Upon consideration of the Motion to Dismiss without Prejudice, the Court HEREBY ORDERS that the motion be:

**GRANTED.** Good cause has been established for this motion. These proceedings are hereby terminated without prejudice. This termination order does not constitute a final judgment rendered on the merits of these proceedings.

**DENIED.** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Immigration Judge Mimi Tsankov

Date: \_\_\_\_\_

---

Certificate of Service

This document was served by:  Mail  Personal Service  
To:  Alien  Alien c/o Custodial Officer  Alien's Atty/Rep  DHS

Date: \_\_\_\_\_ By: Court Staff \_\_\_\_\_

March 31, 2017

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Elias Gastelo, Chief Counsel  
Office of Chief Counsel, Phoenix

Enrique M. Lucero, Field Office Director  
Enforcement and Removal Operations, Field Office,  
Phoenix

Reviewed by: (b)(6);(b)(7)(C)  
Senior Attorney, Florence, Arizona

Author: (b)(6);(b)(7)(C)  
Assistant Chief Counsel, Tucson, Arizona

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



*Office of the Chief Counsel*

**U.S. Department of Homeland Security**

26 Federal Plaza, Rm. 1130  
New York, NY 10278



**U.S. Immigration  
and Customs  
Enforcement**

March 22, 2017

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Angela Marra, Assistant Chief Counsel  
Office of the Chief Counsel, New York City

Through: (b)(6);(b)(7)(C) Senior Attorney  
Office of the Chief Counsel, New York City

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, Field Office New  
York City

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



*Office of the Chief Counsel*

**U.S. Department of Homeland Security**

26 Federal Plaza, Rm. (b)(6);  
New York, NY 10278



**U.S. Immigration  
and Customs  
Enforcement**

March 21, 2017

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Assistant Chief Counsel  
Office of the Chief Counsel, New York City

Through: (b)(6);(b)(7)(C) Senior Attorney  
Office of the Chief Counsel, New York City

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, Field Office New  
York City

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)





*Office of the Chief Counsel*

**U.S. Department of Homeland Security**

26 Federal Plaza, Rm. 1130  
New York, NY 10278



**U.S. Immigration  
and Customs  
Enforcement**

March 23, 2017

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Assistant Chief Counsel  
Office of the Chief Counsel, New York City

THROUGH: (b)(6);(b)(7)(C) Senior Attorney  
Office of the Chief Counsel, New York City

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, Field Office New  
York City

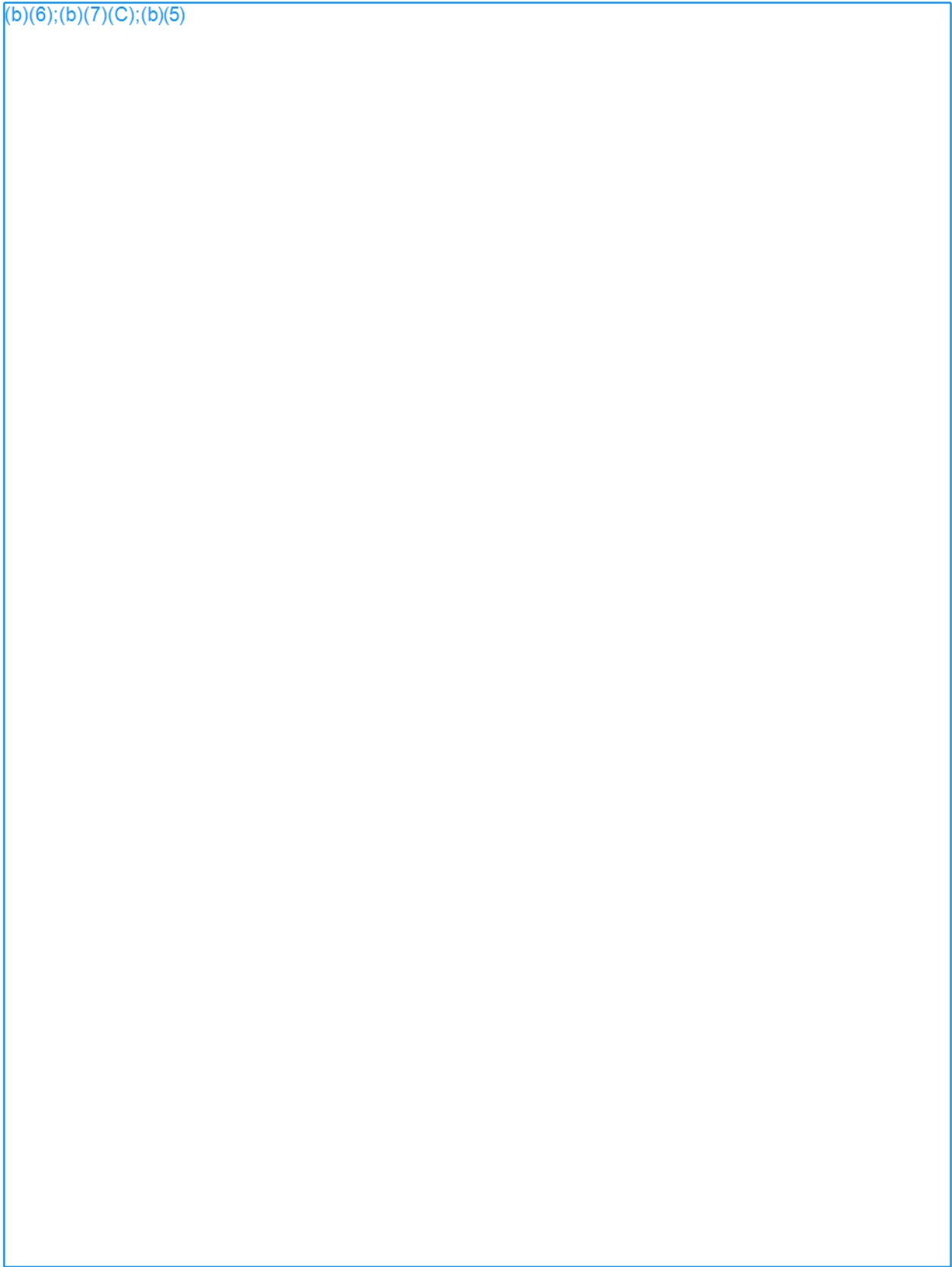
SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

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(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

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(b)(5);WIF Draft

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(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

## USC CLAIMS MEMORANDUM

MEMORANDUM FOR: Field Legal Operations, OPLA  
Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Deputy Chief Counsel  
Office of Chief Counsel, San Diego

Gregory J. Archambeault, Field Office Director  
Enforcement and Removal Operations, San Diego Field  
Office

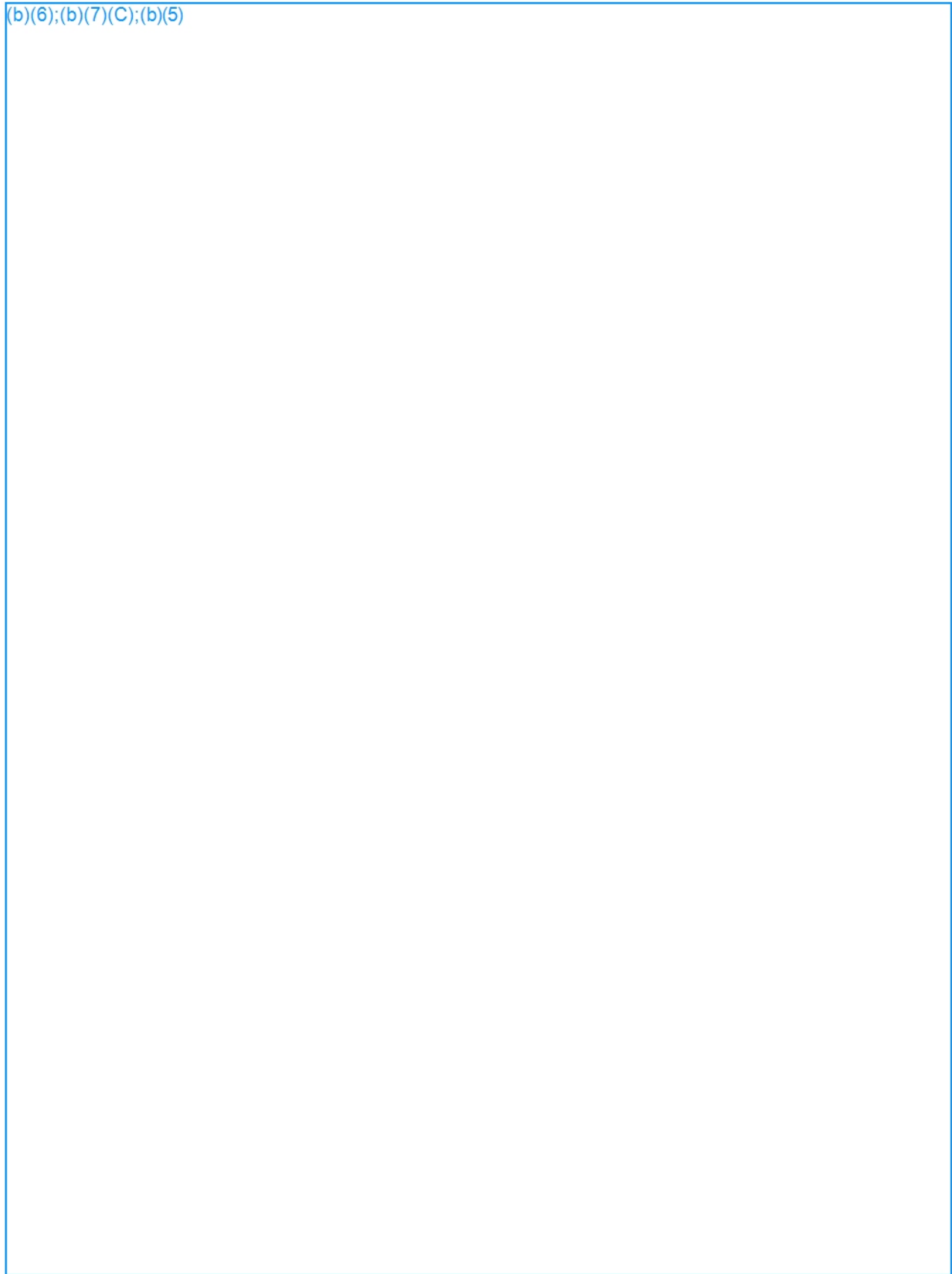
SUBJECT: United States Citizenship Claim

(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

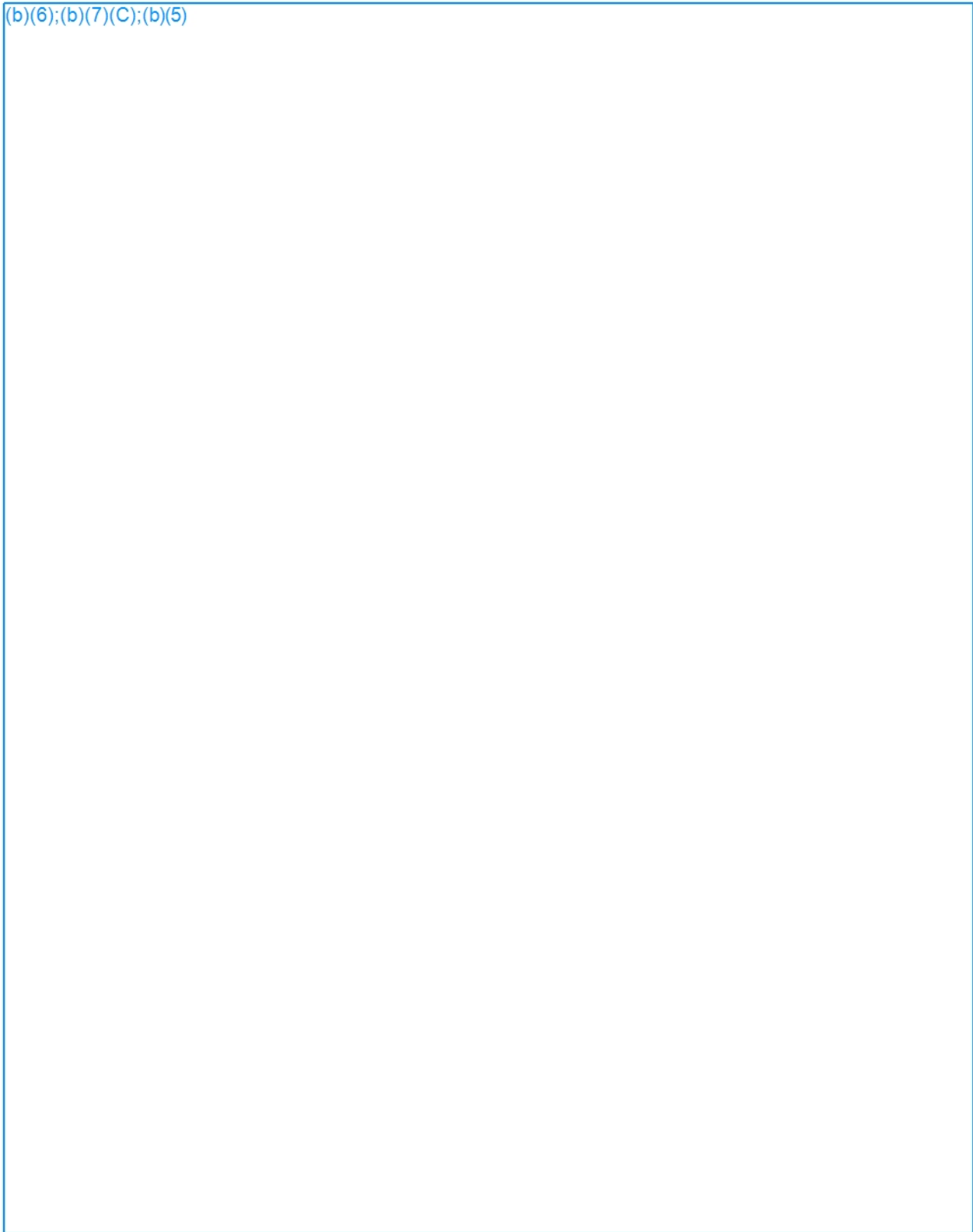
(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Sarah L. Hartnett, Chief Counsel  
Office of Chief Counsel, Houston, Texas

Patrick D. Contreras, Field Office Director  
Enforcement and Removal Operations, Field Office  
Houston, Texas

SUBJECT: Claim to United States Citizenship

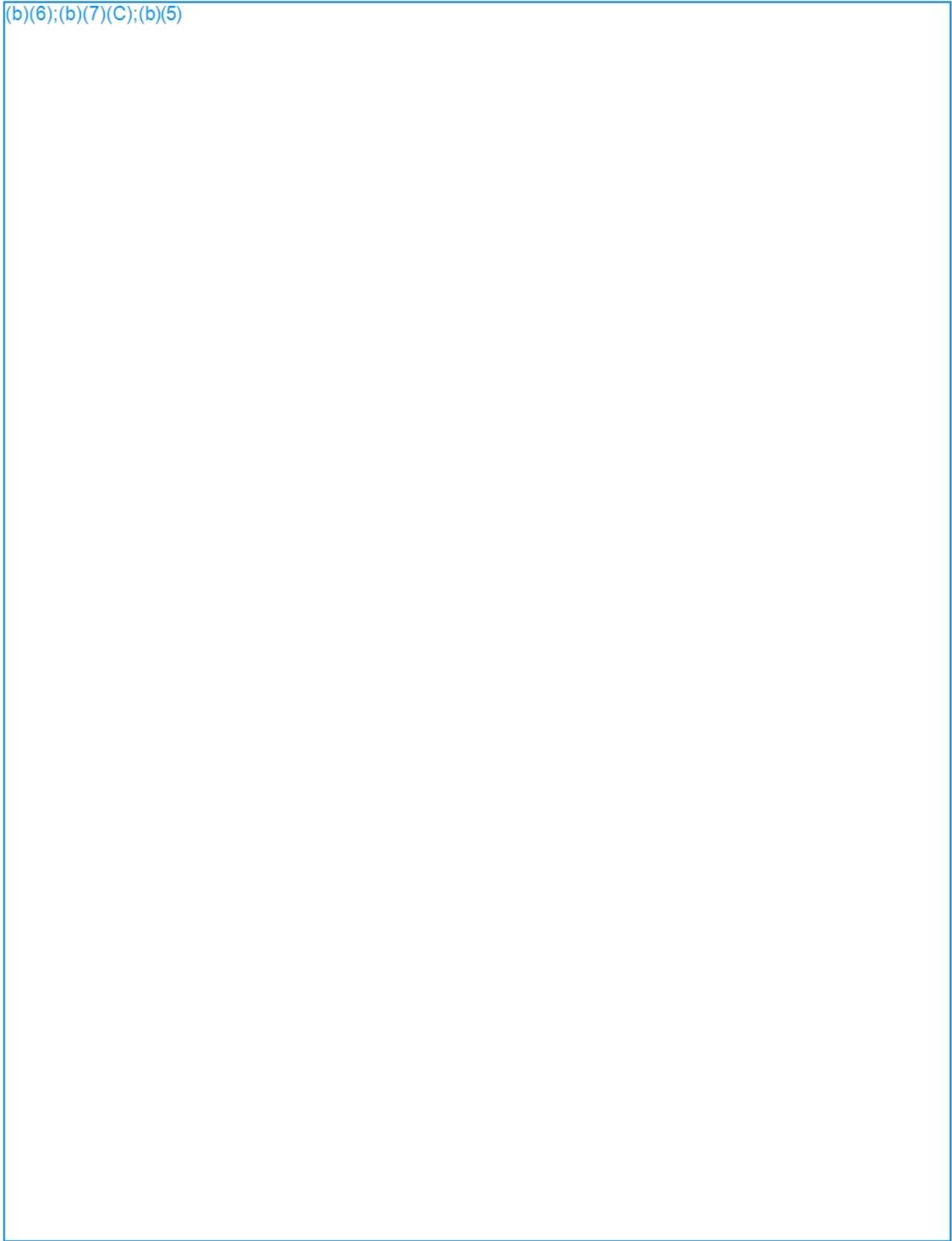
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)





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of the Freedom of Information and Privacy Act

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of the Freedom of Information and Privacy Act

**USC CLAIM MEMORANDUM**

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Jo Ann McLane, Chief Counsel  
Office of Chief Counsel, San Antonio

Daniel A. Bible, Field Office Director  
Enforcement and Removal Operations,  
Field Office San Antonio

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

May 3, 2017

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Nicole Guzman, Chief Counsel  
Office of Chief Counsel, Phoenix

Enrique M. Lucero, Field Office Director  
Enforcement and Removal Operations, Field Office Phoenix

Reviewed by: Senior Attorney (b)(6);(b)(7)(C)  
Phoenix, Arizona

Author: Assistant Chief Counsel (b)(6);(b)(7)(C)  
Phoenix, Arizona

SUBJECT: United States Citizenship Analysis  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

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of the Freedom of Information and Privacy Act

MEMORANDUM FOR: Director of Field Legal Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Jo Ann McLane, Chief Counsel  
Office of the Chief Counsel, San Antonio, Texas

Daniel Bible, Field Office Director  
Enforcement and Removal Operations, Field Office San  
Antonio, Texas

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

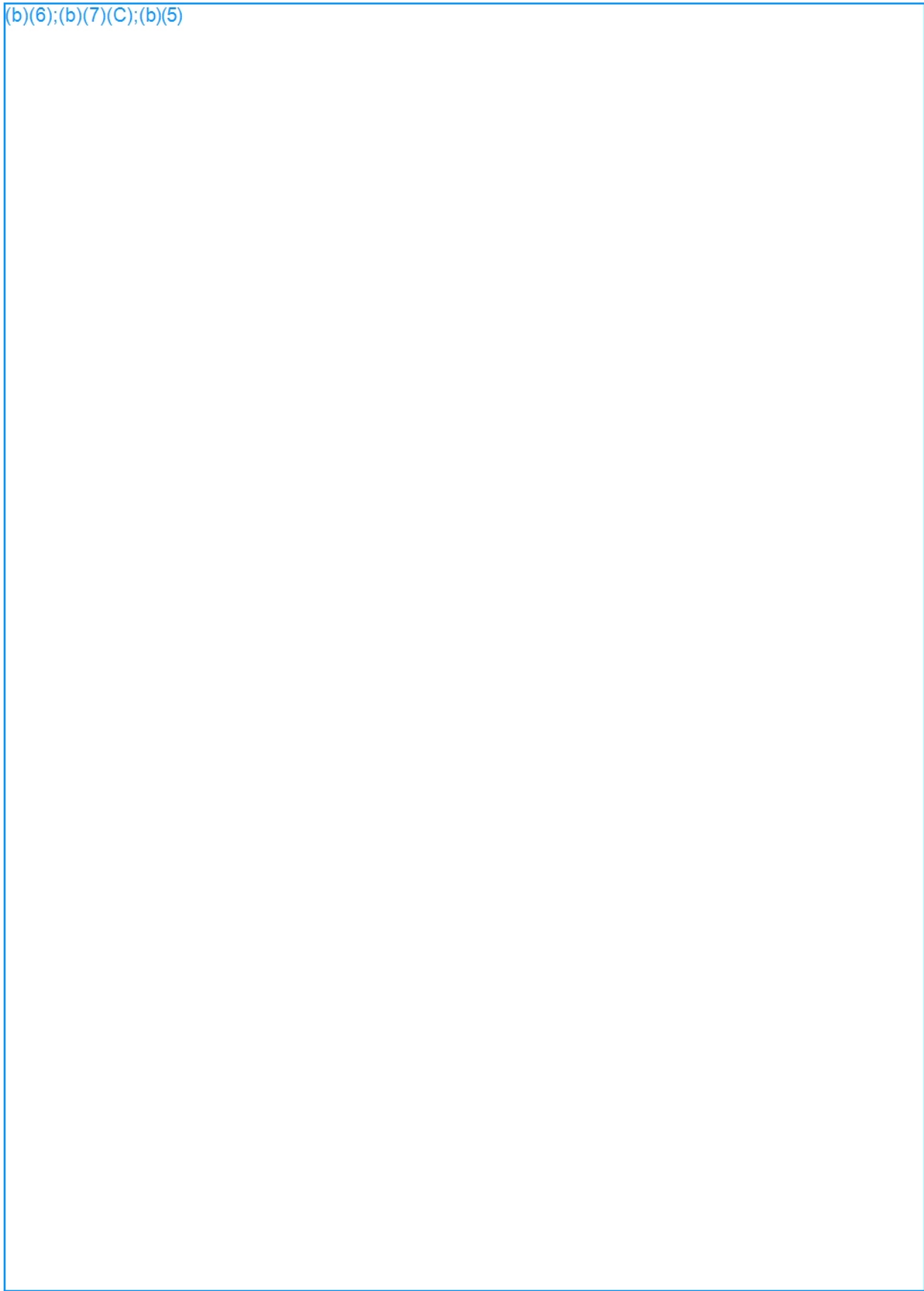
STATEMENT OF THE CASE

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(b)(6);(b)(7)(C);(b)(5)

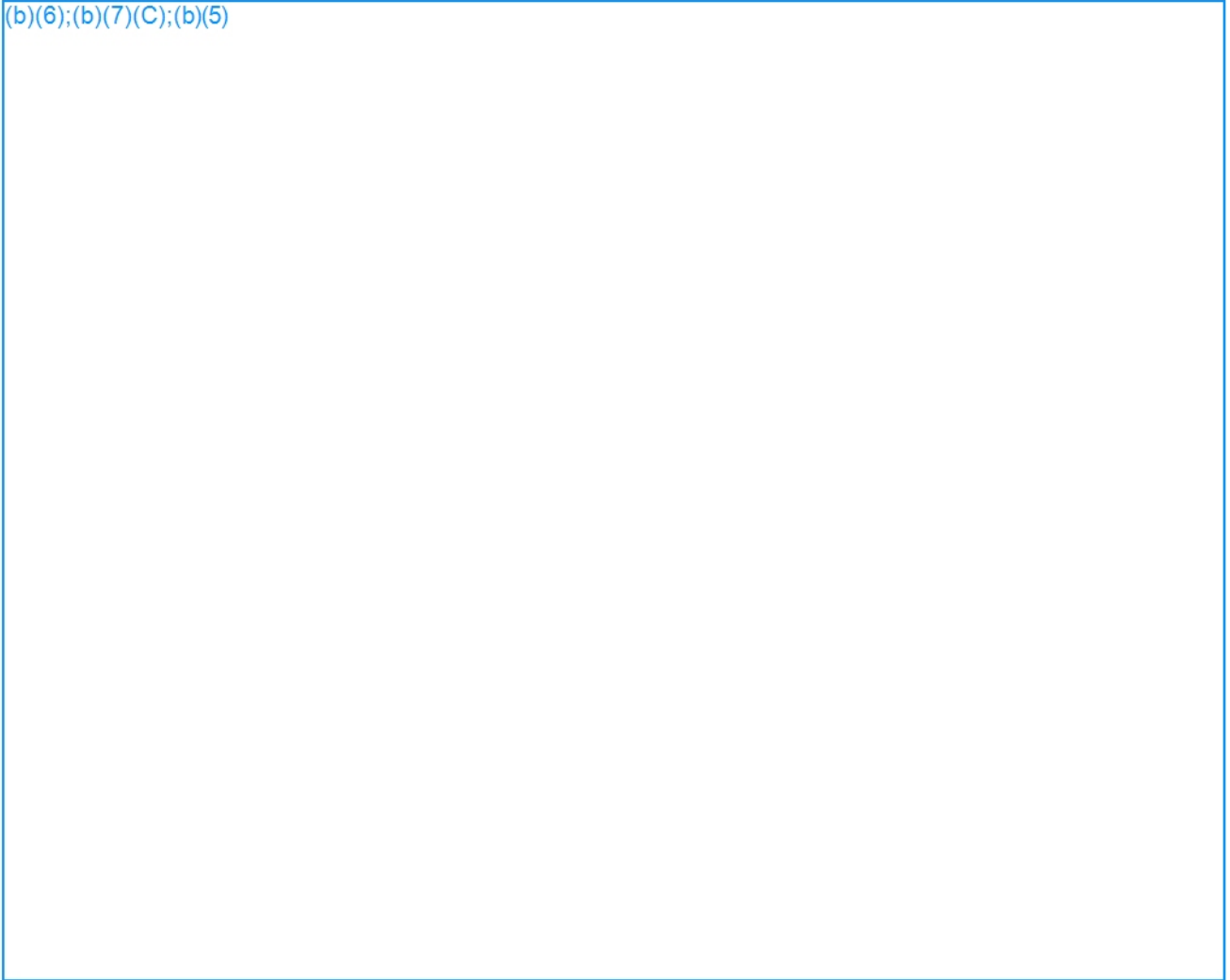


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(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



*Office of the Chief Counsel - Arizona*  
U.S. Department of Homeland Security  
2035 N. Central Avenue  
Phoenix, AZ 85004



U.S. Immigration and Customs Enforcement

May 3, 2017

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Nicole Guzman, Chief Counsel,  
Phoenix, OPLA

Enrique Lucero, Field Office Director,  
Phoenix Field Office, ERO

REVIEWED BY: (b)(6);(b)(7)(C) Senior Attorney, Phoenix, Arizona

AUTHOR: (b)(6);(b)(7)(C), Assistant Chief Counsel, Phoenix, Arizona

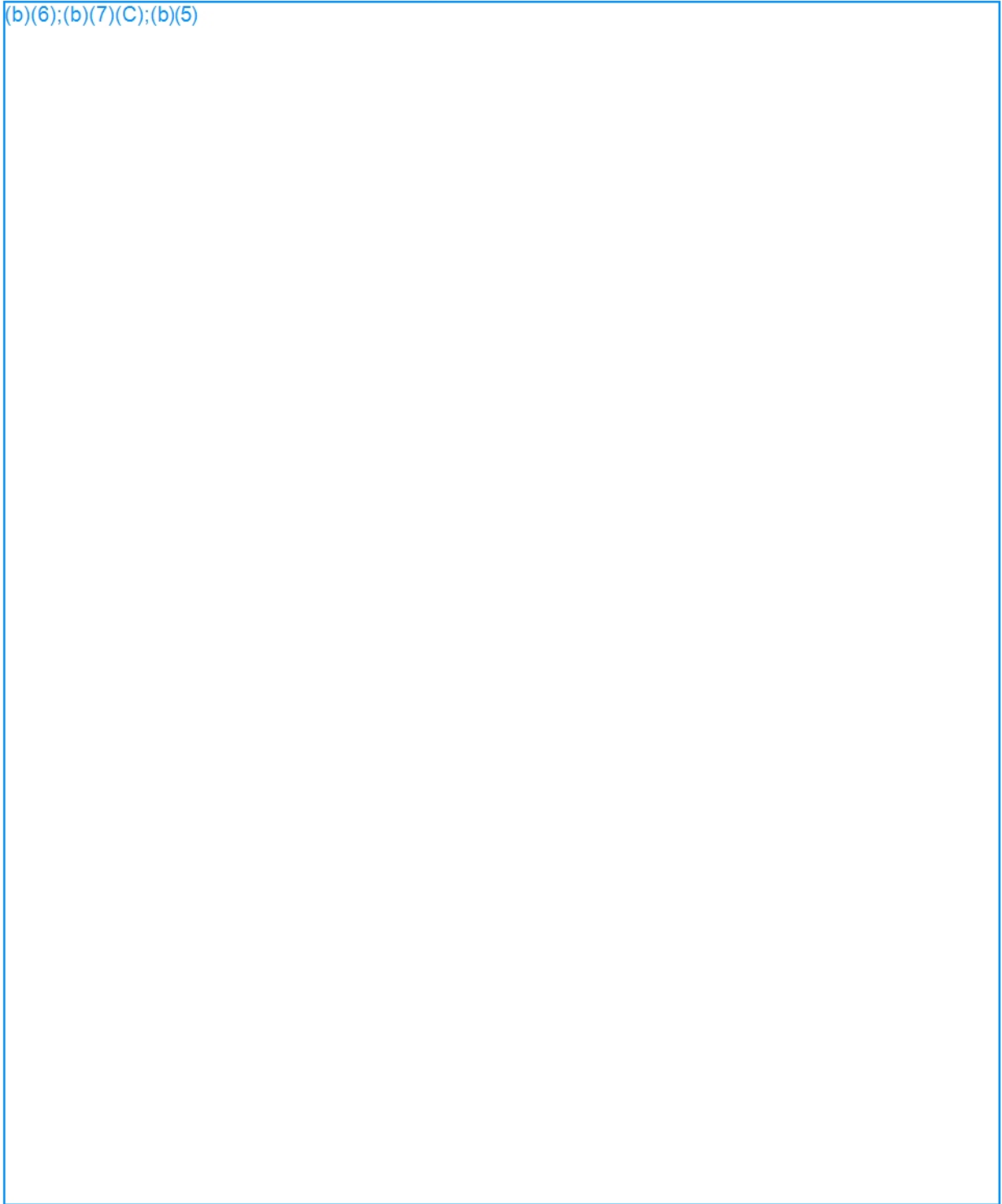
SUBJECT: Case Analysis - Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

FACTS

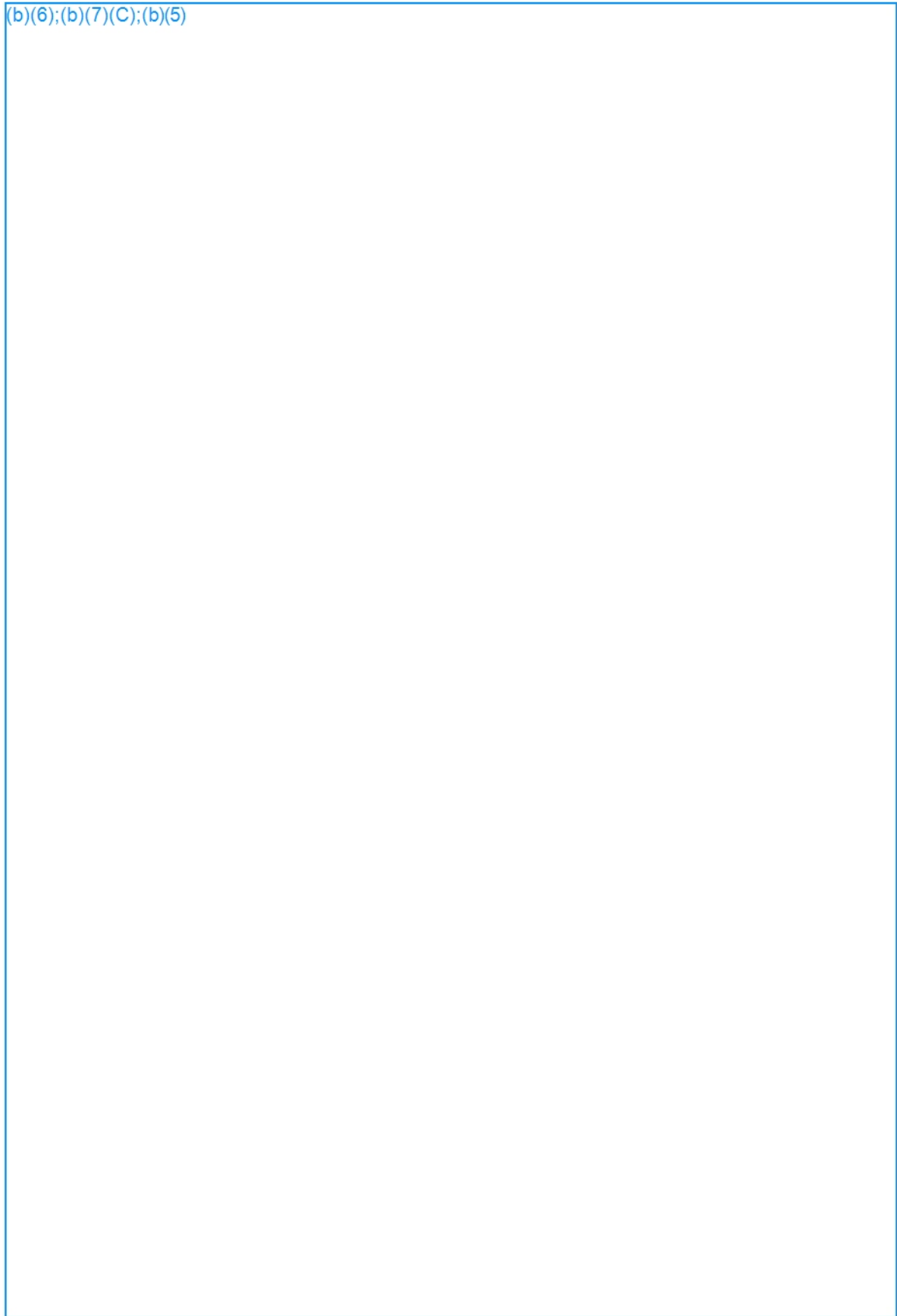
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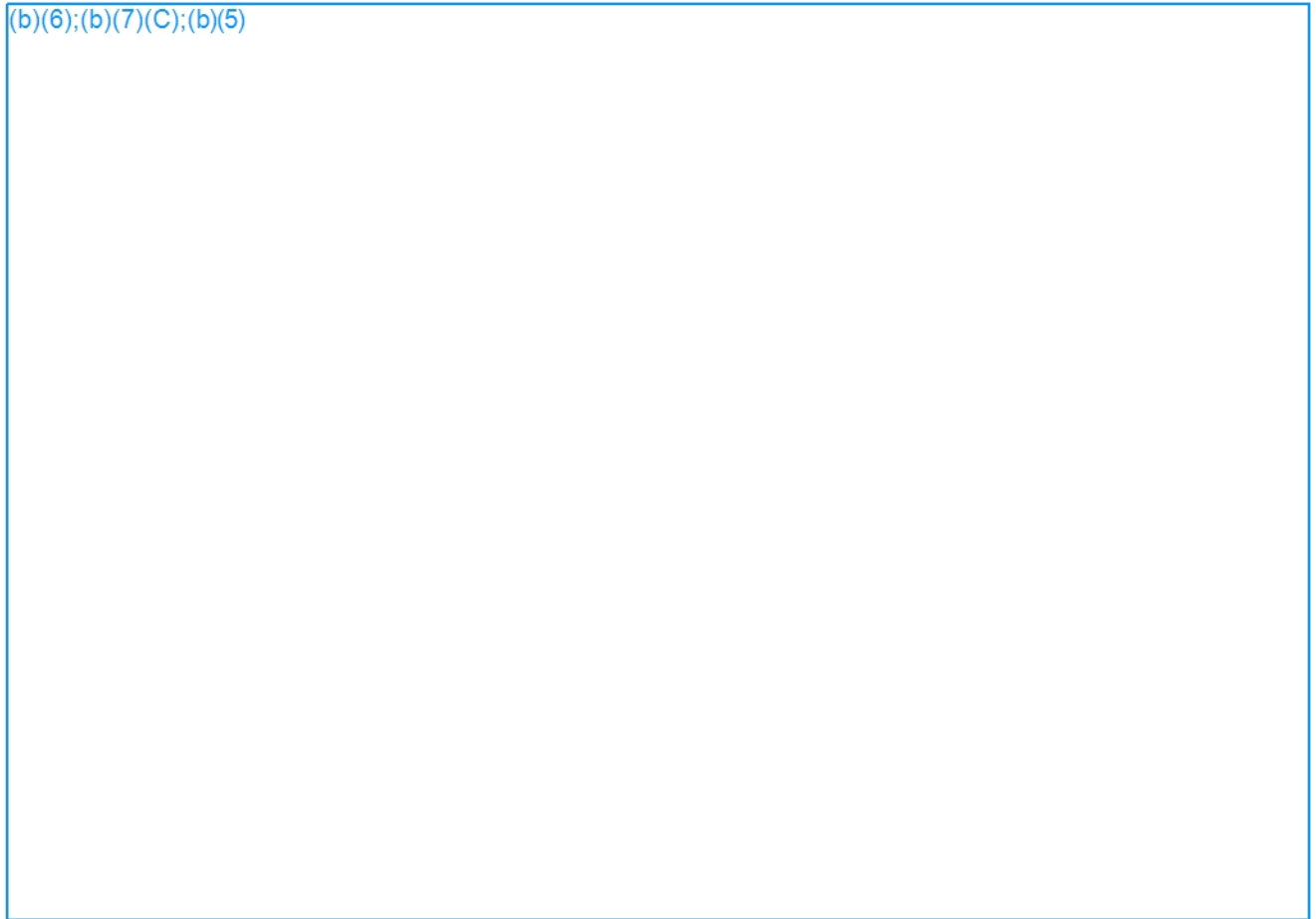


(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



## USC CLAIMS MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York City

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, New York City

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

## USC CLAIMS MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York City

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, New York City

CLAIMANT: Derivation to United States Citizenship  
(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

(b)(6);(b)(7)(C);(b)(5)

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**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



## USC CLAIMS MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York City

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, New York City

CLAIMANT: Derivation to United States Citizenship  
(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

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(b)(6);(b)(7)(C);(b)(5)

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(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

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of the Freedom of Information and Privacy Act

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Sarah L Hartnett, Chief Counsel  
Office of Chief Counsel, Houston, Texas

Patrick D. Contreras, Field Office Director  
Enforcement and Removal Operations, Field Office  
Houston, Texas

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



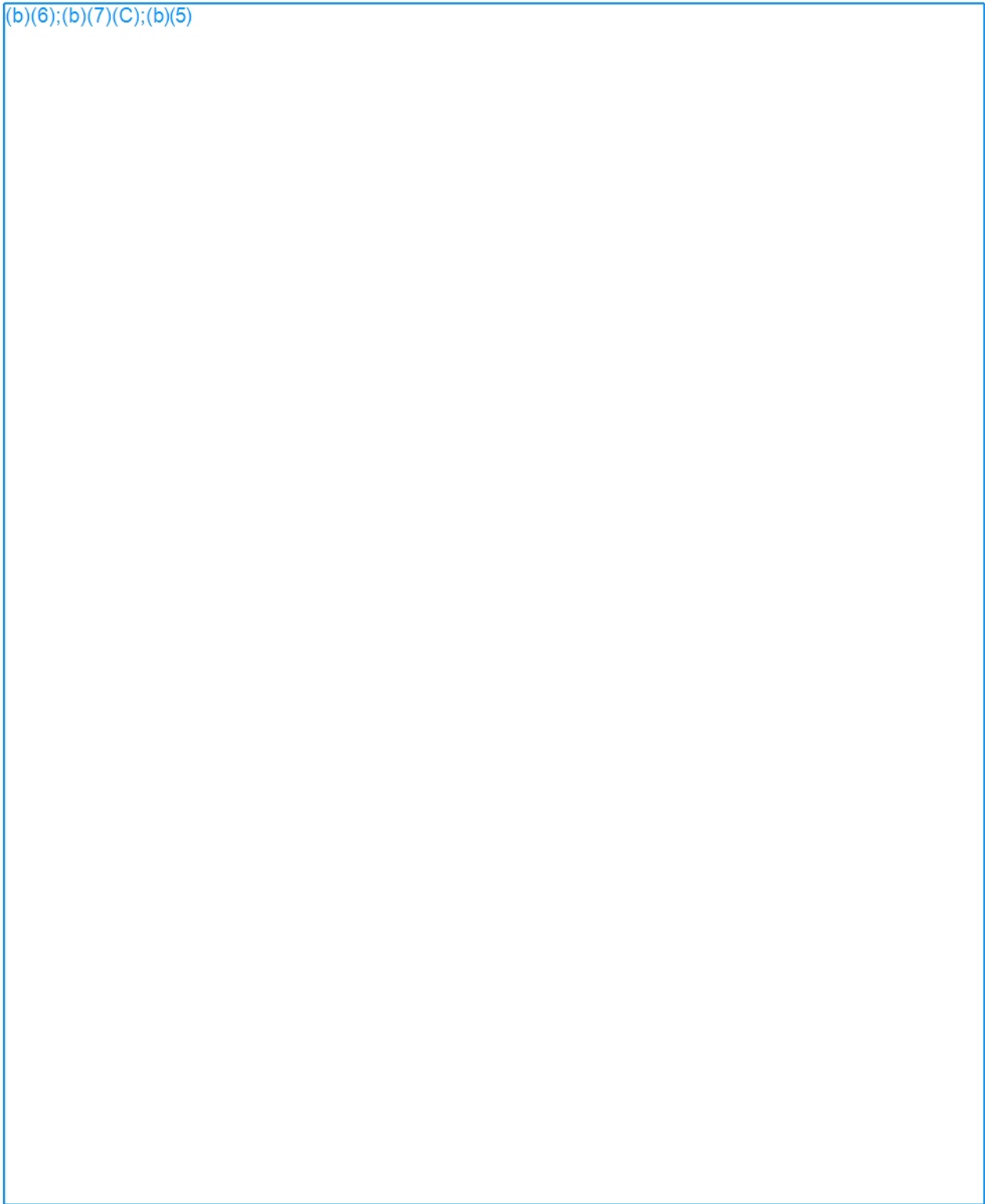
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(b)(6);(b)(7)(C);(b)(5)

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(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



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of the Freedom of Information and Privacy Act

## USC CLAIM MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Jo Ann McLane Chief Counsel  
Office of Chief Counsel,  
  
Daniel Bible, Field Office Director  
Enforcement and Removal Operations, Field Office San  
Antonio

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



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## USC CLAIMS MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: Sarah Hartnett, Chief Counsel  
Office of Chief Counsel, Houston, Texas

Patrick D. Contreras, Field Office Director  
Enforcement and Removal Operations, Field Office  
Houston

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

WIF Draft;(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



# U.S. Immigration and Customs Enforcement

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

DATE: January 19, 2017

MEMORANDUM FOR: DIRECTOR OF FIELD LEGAL OPERATIONS, OPLA  
ASSISTANT DIRECTOR FOR FIELD OPERATIONS, ERO

FROM: David A. Marin, Field Office Director  
Enforcement and Removal Operations, Los Angeles, CA

Sandra D. Anderson, Chief Counsel  
Office of the Chief Counsel, Los Angeles, CA

(b)(6);(b)(7)(C) Deputy Chief Counsel  
Office of the Chief Counsel, Adelanto, CA

(b)(6);(b)(7)(C) Assistant Chief Counsel  
Office of the Chief Counsel, Adelanto, CA

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

## STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

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(b)(6);(b)(7)(C);(b)(5)

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*Office of the Chief Counsel*

**U.S. Department of Homeland Security**  
201 Varick Street, Rm. (b)(6)  
New York, NY 10014



**U.S. Immigration  
and Customs  
Enforcement**

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, New York

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



*Office of the Chief Counsel*

**U.S. Department of Homeland Security**  
15 Governor Drive  
Newburgh, NY 12550



**U.S. Immigration  
and Customs  
Enforcement**

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, New York

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

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(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

CONCLUSION AND RECOMMENDATION

## USC CLAIMS MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York City

(b)(6);(b)(7)(C) Acting Assistant Field Office Director  
Enforcement and Removal Operations, New York City

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

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(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

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(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

## USC CLAIMS MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York City

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, New York City

CLAIMANT: Derivation to United States Citizenship  
(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

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(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

## USC CLAIMS MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York City

(b)(6);(b)(7)(C) Acting Assistant Field Office Director  
Enforcement and Removal Operations, New York City

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

### STATEMENT OF THE CASE

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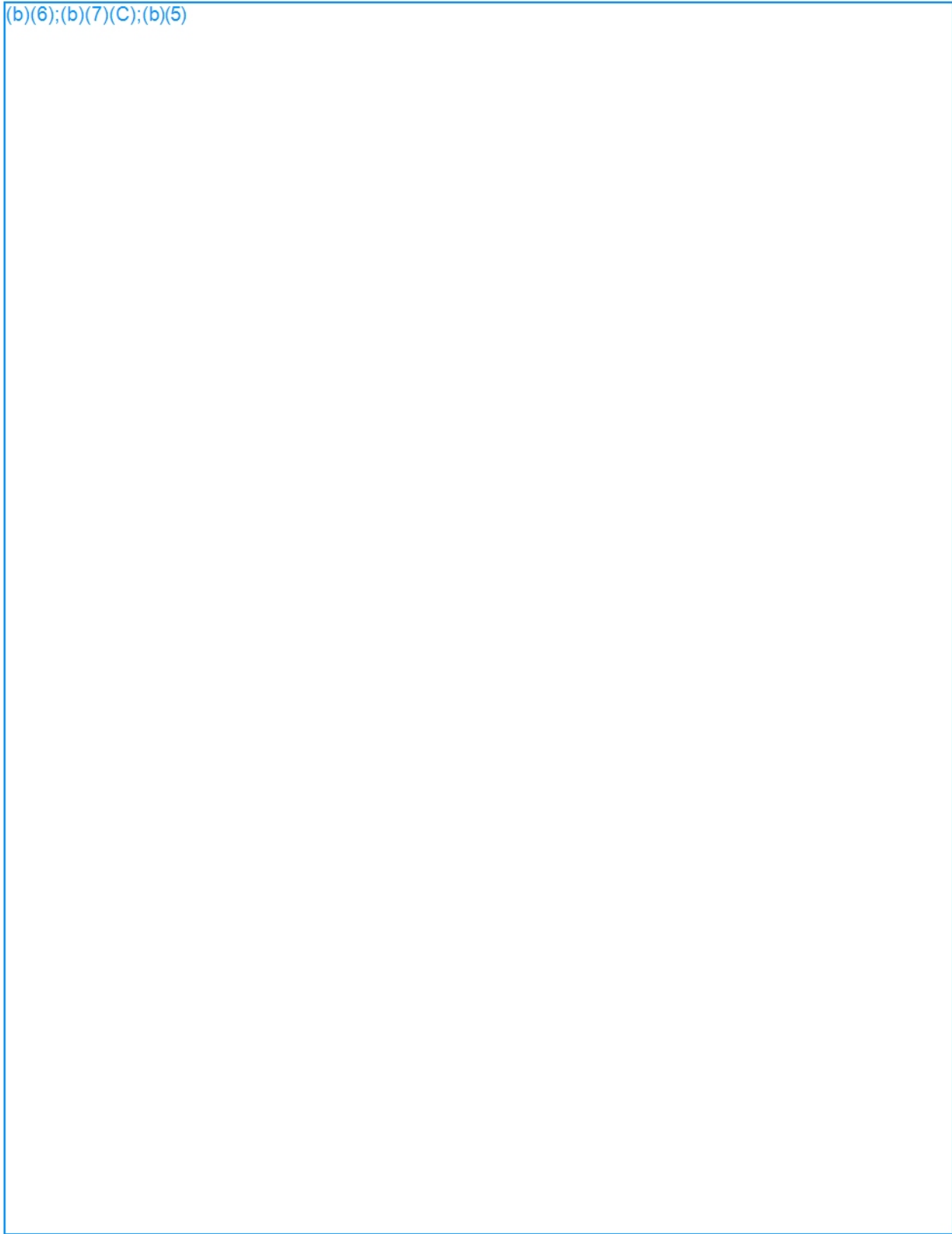
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(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)





**U.S. Immigration  
and Customs  
Enforcement**

*Office of Enforcement and Removal Operations*  
**U.S. Department of Homeland Security**  
606 S. Olive St., Suite (b)(6);(b)(7)(C)  
Los Angeles, CA 90014

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

DATE: April 26, 2017

MEMORANDUM FOR: Deputy Principal Legal Advisor for Field Legal Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: David Marin, Field Office Director  
Enforcement and Removal Operations, Field Office, Los Angeles, CA  
(b)(6);(b)(7)(C) Deputy Chief Counsel  
Office of the Chief Counsel, Los Angeles  
(b)(6);(b)(7)(C) Assistant Chief Counsel  
Office of the Chief Counsel, Los Angeles

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

## USC CLAIMS MEMORANDUM

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York City

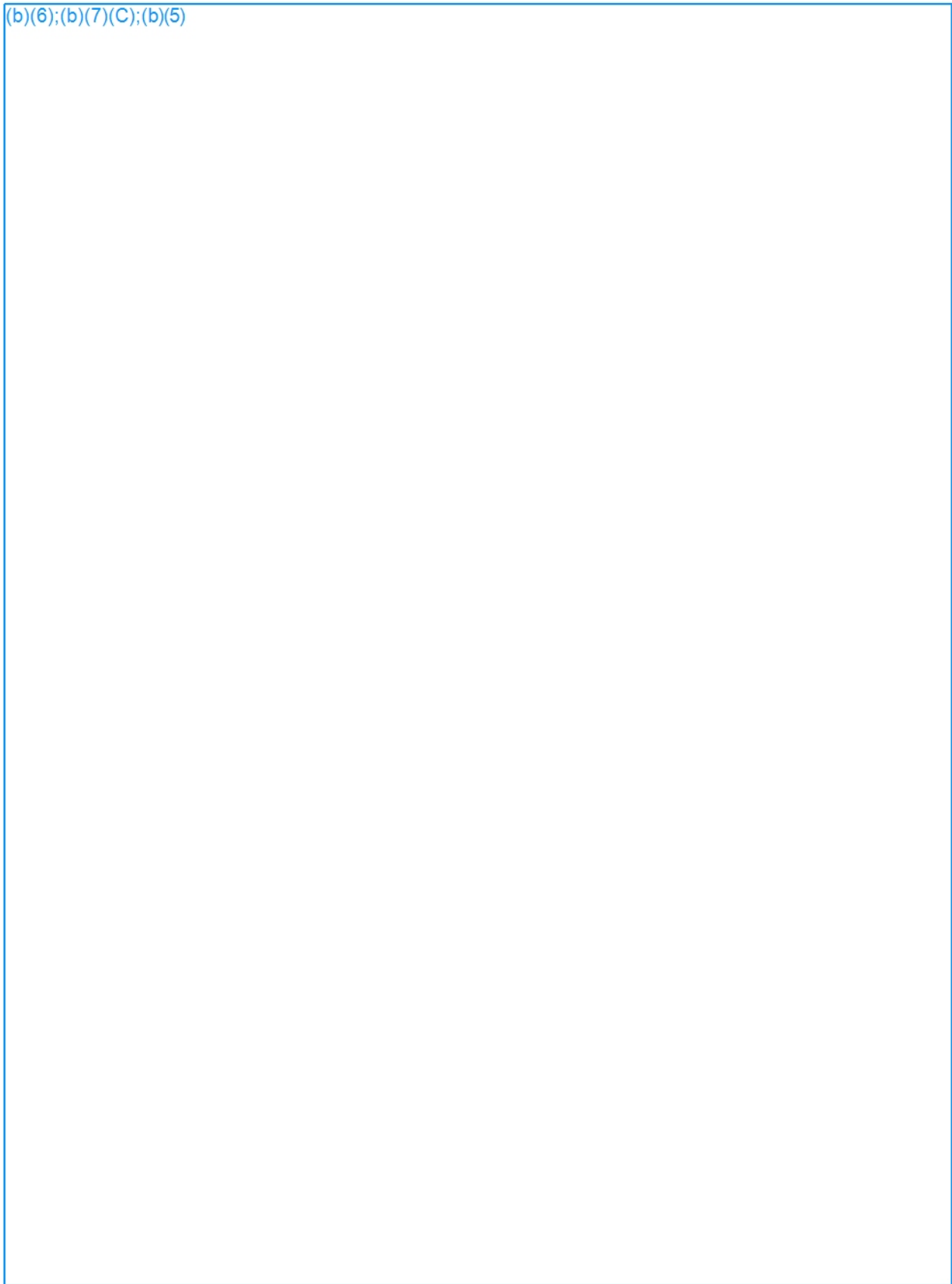
(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, New York City

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

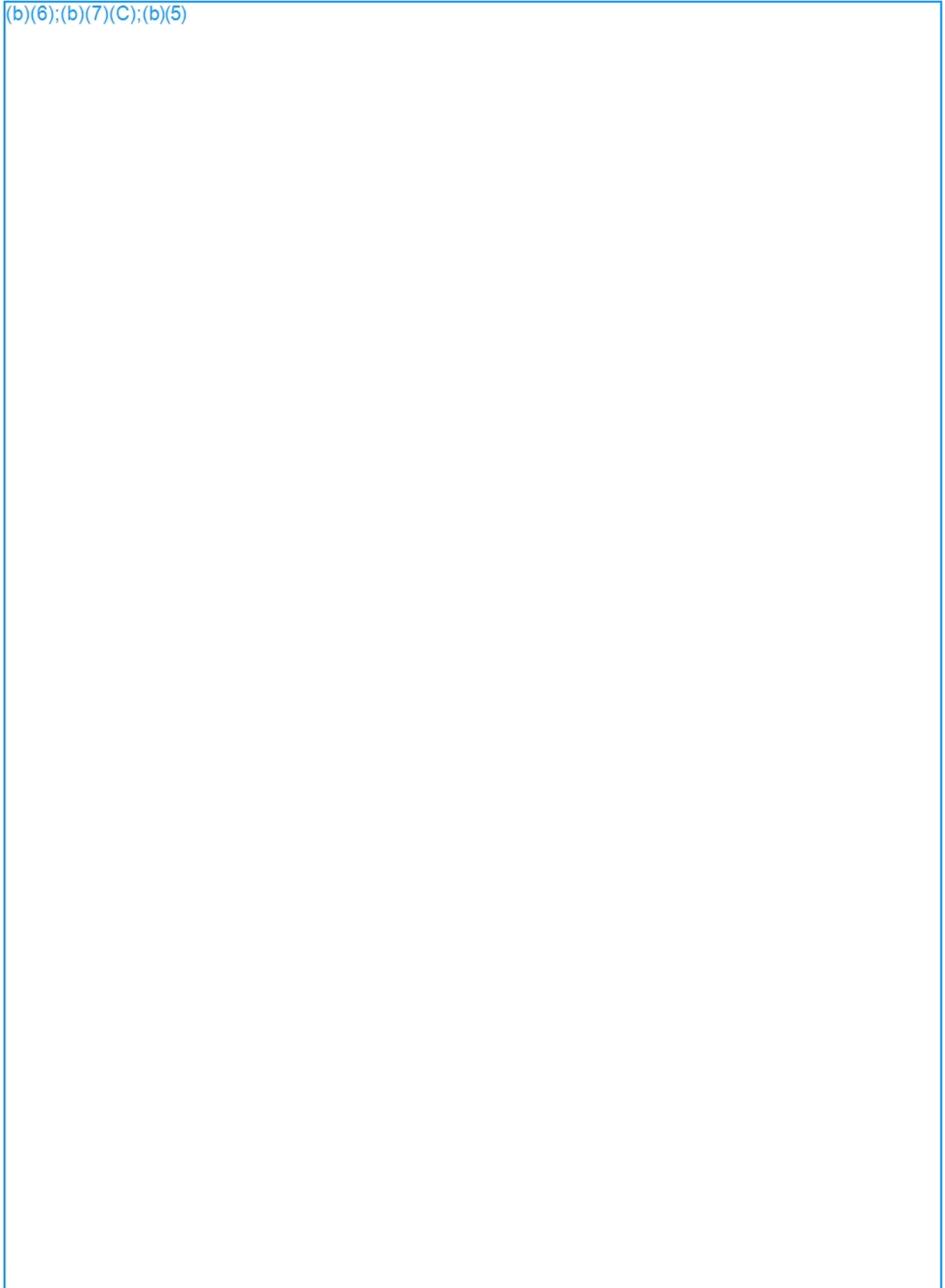
### STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)





(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)



# U.S. Immigration and Customs Enforcement

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

DATE: May 01, 2017

MEMORANDUM FOR: DIRECTOR OF FIELD LEGAL OPERATIONS, OPLA  
ASSISTANT DIRECTOR FOR FIELD OPERATIONS, ERO

FROM: David A. Marin, Field Office Director  
Enforcement and Removal Operations, Los Angeles, CA

Sandra D. Anderson, Chief Counsel  
Office of the Chief Counsel, Los Angeles, CA

(b)(6);(b)(7)(C) Deputy Chief Counsel  
Office of the Chief Counsel, Adelanto, CA

(b)(6);(b)(7)(C) Assistant Chief Counsel  
Office of the Chief Counsel, Adelanto, CA

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

## STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)



# U.S. Immigration and Customs Enforcement

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

MEMORANDUM FOR: DIRECTOR OF FIELD LEGAL OPERATIONS, OPLA  
ASSISTANT DIRECTOR FOR FIELD OPERATIONS, ERO

FROM: David A. Marin  
Field Office Director, Los Angeles, CA

(b)(6);(b)(7)(C)

Deputy Chief Counsel

(b)(6);(b)(7)(C)

Assistant Chief Counsel

SUBJECT: Claim to United States Citizenship

(b)(6);(b)(7)(C)

## STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

**\*\*SENSITIVE/PRIVILEGED\*\*PRE-DECISIONAL\*\*ATTORNEY WORK PRODUCT\*\***

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(5)



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Withheld pursuant to exemption

WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

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Withheld pursuant to exemption

WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act



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of the Freedom of Information and Privacy Act

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of the Freedom of Information and Privacy Act

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of the Freedom of Information and Privacy Act

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WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

*Office of the Chief Counsel*

**U.S. Department of Homeland Security**  
15 Governor Drive  
Newburgh, NY 12550



**U.S. Immigration  
and Customs  
Enforcement**

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, New York

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

*Office of the Chief Counsel*

**U.S. Department of Homeland Security**  
15 Governor Drive  
Newburgh, NY 12550



**U.S. Immigration  
and Customs  
Enforcement**

MEMORANDUM FOR: Director of Field Operations, OPLA  
Assistant Director for Field Operations, ERO

FROM: (b)(6);(b)(7)(C) Senior Attorney  
Office of Chief Counsel, New York

(b)(6);(b)(7)(C) Assistant Field Office Director  
Enforcement and Removal Operations, New York

SUBJECT: Claim to United States Citizenship  
(b)(6);(b)(7)(C)

STATEMENT OF THE CASE

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)

(b)(6);(b)(7)(C);(b)(5)



(b)(6);(b)(7)(C);(b)(5)