



Georgia Department of Driver Services

2206 East View Parkway • Conyers, Georgia 30013 • 678.413.8650

Brian P. Kemp
Governor

Spencer R. Moore
Commissioner

March 10, 2020

American Oversight
Attn: Austin Evers and Khahilia Shaw
1030 15th Street NW
Suite B255
Washington, DC 20005

Re: Open Records Request\ Settlement Agreement and U.S. Territories

Dear Mr. Evers and Ms. Shaw:

This letter is in response to your request under the Open Records Act we received on 2/28/2020. You requested the following information:

1. All final settlement agreements, official and unofficial statements, protocols, guidance, decision memoranda, or documents regarding the decision to allow holders of U.S. Territories driver's licenses to waive the knowledge exam and road test when applying for a Georgia driver's license.

Response to Request No. 1:

Please see the attached fully executed settlement agreement, internal investigation press statement with supporting documents, relevant manager's bulletin, and internal memo.

Please do not hesitate to let me know if you have any questions.

Very truly yours,



ASHLEY POWELL
Assistant General Counsel
ashley.powell@dds.ga.gov

cc: Angelique McClendon, General Counsel
Crandall Heard, Deputy General Counsel

Attachments

RELEASE AND SETTLEMENT AGREEMENT

FOR AND IN CONSIDERATION of payment in the sum of one hundred thousand dollars (\$100,000.00), and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, and for other good and valuable consideration, including the mutual promises contained herein and in the Addendum hereto, the receipt and sufficiency of which also is hereby acknowledged, **Kenneth Caban Gonzalez, both individually and as the representative of members of the proposed class as identified in the LITIGATION (as defined herein)** (hereinafter, RELEASOR) does hereby release, satisfy, quitclaim and forever discharge any and all claims, demands, actions, causes of action, and damages, of every kind and nature whatsoever, past, present or future, whether known or unknown, and whether for monetary or injunctive relief, specifically including, but not limited to, all claims asserted, or which could have been asserted, which RELEASOR and class members might have, or have had, against any or all of the following persons and/or entities: Spencer R. Moore; James Woo; Georgia Department of Driver Services (DDS); the State of Georgia; the Georgia Department of Administrative Services; and all other offices, authorities, agencies, departments, units, divisions, subdivisions, instrumentalities, institutions, commissions, boards and entities of the State of Georgia and any and all employees or agents and former employees or agents of the State of Georgia (collectively, the RELEASED PARTIES), relating to or arising from RELEASOR's own application for a Georgia driver's license or from the applications of class members, including without limitation all claims asserted or which could have been asserted in the civil action styled *Kenneth Caban Gonzalez v. Spencer R. Moore and James Woo*, in the United States District Court for the Northern District of Georgia, Atlanta Division, No. 1:19-cv-3035 (the LITIGATION).

This Release and Settlement Agreement is made by RELEASOR in full and final satisfaction of all such claims against the RELEASED PARTIES through the date of the execution of this Release and Settlement Agreement.

RELEASOR and undersigned counsel expressly acknowledge that as additional consideration for the releases herein, DDS has taken or will take the actions that are set forth in the Addendum hereto, and that such actions and the payment hereunder shall resolve to the satisfaction and benefit of RELEASOR, undersigned counsel, and the Proposed Class (as defined in the Addendum) the claims asserted or that could have been asserted in the LITIGATION.

As further consideration for the payment hereunder, RELEASOR expressly warrants, represents and agrees as follows, and hereby expressly understands and acknowledges that the RELEASED PARTIES are relying upon these warranties, representations, and agreements in tendering the payment under this Release and Settlement Agreement:

1.

The RELEASED PARTIES shall make payment hereunder, and RELEASOR authorizes payment to be made hereunder, by one check in the amount of forty thousand dollars (\$40,000.00) made payable to "Kenneth Caban Gonzalez" and one check in the amount of (\$60,000.00) made payable to "Southern Center for Human Rights as attorneys for Kenneth Caban Gonzalez" by the Department of Administrative Services, within ten days after the execution of this Release and Settlement Agreement and the Addendum hereto.

2.

RELEASOR represents and warrants that he is competent and of legal age to contract. He further represents that as of the date of the execution he has the right and authority to execute this Release and Settlement Agreement and has not sold, assigned, transferred, conveyed or

otherwise disposed of any claim or demand related to any rights surrendered by virtue of this Release and Settlement Agreement.

3.

RELEASOR is the proper party to bring an action for any injuries and any other damages arising out of the above-referenced incident, including but not limited to all bodily, psychological, and personal injuries, and any other expenses or damages that belong to the RELEASOR or which may hereafter accrue to the RELEASOR on account of or resulting from the incidents alleged in the LITIGATION; no other person or entity has, or has had, any interest in the claims, demands, obligations, or causes of action referred to in this Release. RELEASOR has the sole right and exclusive authority to execute this Release and receive the sums specified in it. RELEASOR has not sold, assigned, transferred, conveyed or otherwise disposed of any of the claims, demands, obligations, or causes of action referred to in this Release.

4.

The undersigned will save and hold the RELEASED PARTIES harmless from, and indemnify them for, any and all claims of any nature whatsoever that may hereafter be asserted against the RELEASED PARTIES by any person, agency or entity, resulting from the incidents which are alleged in the LITIGATION.

5.

No promise or agreement not expressed herein or in the Addendum hereto has been made to RELEASOR. In executing this Release and Settlement Agreement RELEASOR is not relying upon any statement or representation made to him by the RELEASED PARTIES or by anyone who has acted for the RELEASED PARTIES, or on the RELEASED PARTIES' behalf, and RELEASOR is relying solely upon his own judgment and the advice of his counsel.

6.

RELEASOR agrees, as further consideration and inducement for this compromise settlement, that this Release and Settlement Agreement shall apply to all unknown, undisclosed and unanticipated injuries and damages resulting from, or alleged to result from, the above-described occurrences, including any issues pertaining to attorneys' fees under 28 U.S.C. § 1920, 42 U.S.C. § 1988, or any other statute or basis for an attorney fee recovery, or any costs and expenses incurred as a result of the pursuit of individual or class claims in the LITIGATION.

7.

RELEASOR understands that this is a final disposition of the dispute between the parties, both as to legal liability and as to the nature and extent of any injuries and/or damages resulting from alleged acts or omissions attributable to the RELEASED PARTIES; that liability is expressly denied by the RELEASED PARTIES; that said payment and settlement and compromise are made to seek peace and secure resolution and to terminate further controversy respecting all claims for damages that have been or could be asserted against the RELEASED PARTIES on account of said occurrence, including attorneys' fees, costs, and expenses; and that this full and final settlement thereof is not an admission of liability, shall not be treated as an admission at any time or in any manner whatsoever, and in no way prejudices the rights of the RELEASED PARTIES to deny liability.

8.

RELEASOR understands that his counsel will sign the Stipulation of Dismissal With Prejudice in Civil Action No. 1:19-cv-3035 (N.D. Ga.), a copy of which is attached hereto, contemporaneously with the signing of this Release and Settlement Agreement and agrees that

his counsel will file the same with the Court as soon as possible but no later than fifteen business days following receipt of the payment described herein.

9.

No insurance carrier, medical provider or other entity or person, including state and federal governmental entities or agencies, has any lien or subrogation interest or claim for reimbursement arising out of the aforesaid occurrence, specifically including but not limited to any liens or claims arising out of the payment of workers' compensation benefits; hospital, medical expenses; ERISA, Medicare or Medicaid payments; or if there are any such liens, interests, or claims for reimbursement, they will be satisfied by the proceeds received by RELEASOR paid in connection herewith, and the undersigned will save and hold the RELEASED PARTIES harmless from, and indemnify them for, any and all claims of any nature whatsoever that may hereafter be asserted against them by any person, agency or entity claiming any such interest, lien, or reimbursement.

10.

RELEASOR acknowledges and agrees that it will be the sole responsibility of RELEASOR to pay any taxes due on the settlement amount if any; and that RELEASOR specifically agrees to hold RELEASED PARTIES harmless as to any tax liability that may result. RELEASOR agrees to provide any tax forms, including but not limited to W-9 forms, required in order for the RELEASED PARTIES to process any payment agreed to upon request.

11.

RELEASOR understands that all or a portion of the consideration paid herewith is being paid by the Georgia Department of Administrative Services as administrator of the Liability Trust Fund and, to the extent it is considered to be a liability insurance carrier, it is acting as an

independent contractor in connection with this settlement and not as an agent of any party released hereby. RELEASOR hereby waives any further notice of that fact and acknowledges that the entities or individuals discharged under this Release have not consented in writing and thus are not precluded from the assertion of any claims that they may have or claim to have against the undersigned, pursuant to O.C.G.A. § 33-7-12.

12.

Nothing in this Release and Settlement Agreement or in the Addendum hereto shall be construed as the State of Georgia's waiver of immunities available under state and/or federal law.

13.

All agreements and understandings between the parties hereto are embodied and expressed herein and in the Addendum hereto and the terms of this Release and Settlement Agreement and Addendum are contractual and not mere recitals. This Release and Settlement Agreement and Addendum constitute an accord and satisfaction of any and all claims of the RELEASOR against the RELEASED PARTIES. The RELEASOR further declares and represents that no promise, inducement, or agreement not expressed herein or in the Addendum has been made to him, and this Release and Settlement Agreement and Addendum contain the entire agreement between the parties. All of the foregoing representations are made in order for the RELEASED PARTIES to rely upon them in effecting this compromise.

14.

This Release and Settlement Agreement and the Addendum hereto may not be altered, amended, or modified in any respect whatsoever, except in writing, duly executed by all parties

hereto: however, copies or facsimiled versions of the original Release and Settlement Agreement and the Addendum may be used for any purpose for which the original may be used.

15.

This Release and Settlement Agreement and the Addendum hereto are made and entered into in the State of Georgia, and shall in all respects be interpreted, enforced, and governed under the laws of said State. The language of all parts of this Release and Settlement Agreement and the Addendum shall in all cases be construed as a whole, according to its fair meaning.

16.

With the exception of any provisions relating to the payments agreed to be made to RELEASOR by the RELEASED PARTIES pursuant to this Release and Settlement Agreement, should any provision of this Release and Settlement Agreement or the Addendum hereto be declared or be determined by any court to be illegal or invalid, the validity of the remaining parts, terms, or provisions shall not be affected thereby and said illegal or invalid part, term, or provision shall be deemed not to be part of this Release and Settlement Agreement or the Addendum.

17.

This Release and Settlement Agreement shall become effective following execution by the RELEASOR and his counsel.

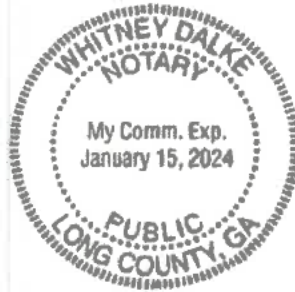
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BY SIGNATURE BELOW RELEASOR REPRESENTS THAT HE HAS READ THE FOREGOING AND FULLY UNDERSTANDS AND AGREES TO ITS TERMS

IN WITNESS WHEREOF, RELEASOR, Kenneth Caban Gonzalez, individually and as the representative of members of the Proposed Class as identified in the LITIGATION, has set his hand and seal this 31 day of January, 2020.

Kenneth Caban Gonzalez
Kenneth Caban Gonzalez

Sworn to and subscribed
before me this 31
day of January, 2020.
Whitney Dalke
Notary Public



I HAVE READ AND APPROVED THIS RELEASE AND SETTLEMENT AGREEMENT AND THE ADDENDUM HERETO ON BEHALF OF RELEASOR AND MEMBERS OF THE PROPOSED CLASS AS IDENTIFIED IN THE LITIGATION

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Atteeyah Hollie
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Gerald Weber
Georgia Bar No. 744878
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*As Attorney for RELEASOR and
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*As Attorney for RELEASOR and
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Kira Romero-Craft
Kira Romero-Craft
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Orlando, Florida
*As Attorney for RELEASOR and
members of the Proposed Class*

ADDENDUM

This Addendum is made as of this 31st of January, 2020, between and among Kenneth Caban Gonzalez (Plaintiff), the Southern Center for Human Rights and Latino Justice PRIDEF, as counsel for Plaintiff and members of the Proposed Class (as defined herein), and the Georgia Department of Driver Services (DDS).

WHEREAS, Plaintiff through his undersigned counsel and on behalf of himself and others similarly situated asserted claims against DDS and individual Defendants in the case styled *Kenneth Caban Gonzalez v. Spencer R. Moore and James Woo*, in the United States District Court for the Northern District of Georgia, Atlanta Division, Civil Action No. 1:19-cv-3035 (the LITIGATION):

WHEREAS, the LITIGATION is a civil action under 42 U.S.C. § 1983 and Title VI of the Civil Rights Act of 1964 and asserts claims arising from applications for Georgia driver's licenses that were submitted by Puerto Rico-born United States Citizens. Specifically, in the LITIGATION, Plaintiff, on behalf of himself and others similarly situated, claims (i) that DDS' policies and practices deny notice and an opportunity for a hearing to Puerto Rico-born United States citizens seeking Georgia driver's licenses in violation of the Due Process clause of the U.S. Constitution; (ii) that DDS unlawfully and/or discriminatorily failed to exchange valid Puerto Rico driver's licenses for Georgia Driver's licenses in violation of the U.S. Constitution's Privileges and Immunities clause and Equal Protection clause, as well as Title VI of the Civil Rights Act; and (iii) that DDS and its individual employees or officers unlawfully retained valid Puerto Rico driver's licenses and original identity documents in violation of the Fourteenth Amendment to the U.S. Constitution. These claims are asserted both individually and as a proposed class action, with the Proposed Class defined as "Puerto Rico-born applicants for a

Georgia driver's license, who established residence in the State from July 2017 through the present, but whose applications remain unlawfully undecided by DDS and/or whose Puerto Rican identity documents are unlawfully retained for an unreasonable amount of time;"

WHEREAS, DDS and the individual Defendants deny the claims and allegations in the LITIGATION, deny that its policies or practices unlawfully discriminated against or in any other way violated the rights of the Proposed Class, and deny all claims of wrongdoing, damages, and any liability whatsoever to Plaintiff or members of the Proposed Class:

WHEREAS, without conceding the merits or lack of merit of any claim or defense or the existence of any liability whatsoever, the parties wish to settle, compromise, and finally and forever resolve all matters, controversies, disputes, and claims that may exist between them relating to the subject matter of the LITIGATION, including without limitation any claims that were or could have been asserted in the LITIGATION by Plaintiff or by members of the Proposed Class:

WHEREAS, Plaintiff and his undersigned counsel have signed or contemporaneously with this Addendum will sign a Release and Settlement Agreement (the Release) which provides for Plaintiff's release and dismissal of all claims he has asserted or could assert in the LITIGATION in exchange for the settlement payment set forth in the Release and the additional promises and actions set forth herein which are to be carried out by DDS;

NOW, THEREFORE, in consideration of the mutual covenants and promises set forth in the Release and in this Addendum, and for other good and valuable consideration, the adequacy and sufficiency of which are hereby acknowledged, the parties agree as follows:

I. EXCHANGE OF VALID U.S. TERRITORY-ISSUED LICENSES FOR GEORGIA DRIVER'S LICENSES

1. DDS shall issue a Georgia driver's license without requiring completion of the knowledge exam and road skills tests to applicants from U.S. territories, including Puerto Rico, who (i) present a valid driver's license (current or expired for less than two years) issued by a U.S. territory (Puerto Rico, Guam, U.S. Virgin Islands, American Samoa, and Northern Mariana Islands); (ii) are eighteen (18) years of age or older; and (iii) meet the Georgia residency and proof of identity requirements set forth in Ga. Comp. R. & Regs. § 375-3-1-.02(3) and (5). DDS shall treat Puerto Rico original documents in the same manner as similar documents from U.S. mainland states, provided that DDS will only accept birth certificates issued by Puerto Rico on or after July 1, 2010.

2. To effectuate this term, no later than seven (7) days after the effective date of this Addendum, DDS will issue and disseminate the Field Operations Manager's Bulletin entitled "Transfers from Puerto Rico and other U.S. Territories" (Attachment 1).

3. In addition, no later than seven (7) days after the effective date of this Addendum, DDS will publish the following notice on its website:

Effective January XX, 2020, customers with valid driver's licenses or licenses that have been expired for less than two years issued by United States Territories (Puerto Rico, Guam, U.S. Virgin Islands, American Samoa, and Northern Mariana Islands) will be exempt from the knowledge exam and road skills tests.

4. Finally, beginning January 2020, DDS will propose to its board language to amend Ga. Comp. R. & Regs. § 375-3-1-.05(1) to permit reciprocity as set forth herein for applicants presenting U.S. territorial driver's licenses. The parties understand that the amendment of DDS' rules and regulations will follow the typical promulgation process.

II. CONFIRMATION OF DISCONTINUANCE OF USE OF “PUERTO RICO INTERVIEW GUIDE”

5. Consistent with prior statements and actions of DDS, DDS will issue a Commissioner Directive to the Office of Investigative Services (“OIS”) disavowing the so-called “Puerto Rico Interview Guide” (“Guide”) and categorically prohibiting its use. DDS will clarify to OIS staff that the Guide was not authorized by DDS and is not to be used.

6. To effectuate this term, no later than seven (7) days after the effective date of this Addendum, DDS will issue and disseminate the Commissioner Directive to OIS regarding the “Puerto Rico Interview Guide” (Attachment 3).

III. NOTICES IN APPLICATION PROCESS

7. DDS will provide the following notices to a customer whose application has been referred to OIS due to suspected fraud.

- i. DDS will provide the customer with the OIS Referral Letter (Attachment 5) at the point of application;
- ii. DDS will provide the customer with the Discrepancy Letter (Attachment 6) at the point an investigation is opened by OIS. The Discrepancy Letter will serve as a denial of the application if the customer does not contact OIS within fifteen (15) days after issuance of the Discrepancy Letter.
- iii. DDS will provide the customer with the Open/Pending Investigation Letter (Attachment 7) in the event the customer has contacted the OIS investigator but has not provided sufficient information for the investigator to confirm his or her identity;
- iv. DDS will provide the customer with the 180-day Letter (Attachment 9) in the event that an investigation remains pending or unresolved for a period of 180

days or more. This letter serves as a denial of the application and informs the customer of their right to appeal the denial to the State Superior Court in accordance with O.C.G.A. § 40-5-66;

v. DDS will provide the customer with the Referral for Prosecution Notice (Attachment 10) in the event their application is referred for prosecution. This letter serves as a denial of the application and informs the customer of their right to appeal the denial to the State Superior Court in accordance with O.C.G.A. § 40-5-66.

8. A customer whose application remains pending OIS investigation may, on a periodic basis, request an update on the status of the investigation. OIS will provide a written Status Update (Attachment 8) upon request from the customer, but no more than one such update will be provided every thirty (30) days. Customers must respond to the Discrepancy Letter in order to receive a Status Update while their application remains pending.

9. To effectuate these terms, no later than seven (7) days after the effective date of this Addendum, DDS will issue and disseminate to OIS staff the following documents:

- i. OIS Referral Letter (Attachment 5);
- ii. Discrepancy Letter (Attachment 6);
- iii. Open/Pending Investigation Letter (Attachment 7);
- iv. Status Update (Attachment 8);
- v. 180-day Letter (Attachment 9);
- vi. Referral for Prosecution Notice (Attachment 10).

10. Further, no later than seven (7) days after the effective date of this Addendum, DDS will issue and disseminate the Commissioner Directive to OIS regarding Policy Changes

(Attachment 4). DDS will apprise OIS staff of the terms referenced herein and advise them that customers whose application remains pending for 180 days or more will have the option to request and arrange the return of their original identity documents.

IV. AFFIRMATIVE ANTI-DISCRIMINATION ACTIONS AND LANGUAGE ASSISTANCE

11. DDS will make notice of its non-discrimination policy more available and prominent at its customer service locations.

12. To effectuate this term, no later than seven (7) days after the effective date of this Addendum, DDS will issue and disseminate the Field Operations Manager's Bulletin regarding Limited English Proficiency Accommodations (Attachment 2).

13. DDS will also continue to provide training to its service staff on the Title VI program and how to refer cases to its Non-Discrimination Policy Coordinator for investigation.

It is the intent of the parties that, in acting in accordance with the terms described herein, DDS will satisfactorily address and resolve the basic claims of the LITIGATION, namely (i) that DDS' policies and practices deny notice and an opportunity for a hearing to Puerto Rico-born United States citizens seeking Georgia driver's licenses in violation of the Due Process clause of the U.S. Constitution; (ii) that DDS unlawfully and/or discriminatorily failed to exchange valid Puerto Rico driver's licenses for Georgia Driver's licenses in violation of the U.S. Constitution's Privileges and Immunities clause and Equal Protection clause, as well as Title VI of the Civil Rights Act; and (iii) that DDS and its individual employees or officers unlawfully retained valid Puerto Rico driver's licenses and original identity documents in violation of the Fourteenth Amendment to the U.S. Constitution; and more broadly, that DDS discriminated against Puerto Rico-born applicants for Georgia driver's licenses.

DDS is committed to following the practices set forth herein. However, the parties agree that DDS retains full and sole authority, discretion, and ability to alter or modify its policies, processes, and internal bulletins and/or correspondence, including any of the attachments to this Addendum, and is not required to seek leave from Plaintiff, the undersigned counsel for Plaintiff or the Proposed Class, or the Court, to make any such modifications, provided that such modifications do not substantively alter DDS' commitment to reciprocity, due process notifications, and anti-discrimination practices as set forth in this Addendum.


This Addendum shall become effective following its execution and the execution of the Release.

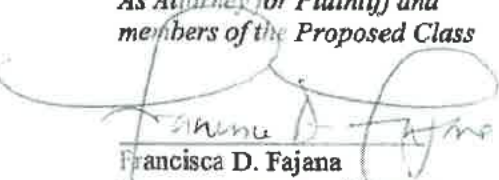
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REVIEWED AND AGREED TO BY:

FOR PLAINTIFF AND
THE PROPOSED CLASS:

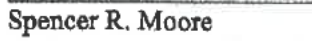

Kenneth Caban Gonzalez

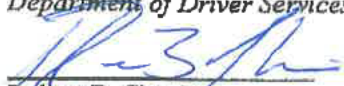

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FOR DEFENDANTS:


Spencer R. Moore
*As Commissioner of the Georgia
Department of Driver Services*


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Roger A. Chalmers
Georgia Bar No. 118720
STATE LAW DEPARTMENT
40 Capitol Square, S.W.
Atlanta, Georgia 30334
*As Attorney for the Georgia
Department of Driver Services
and the individual Defendants*



December 17, 2019

Statement

Internal Investigation Results

Georgia Department of Driver Services (DDS) released the following response to findings in an internal affairs investigation conducted by the Georgia Bureau of Investigation (GBI) into the Agency's handling of documents presented from Puerto Rico and a subsequent lawsuit.

Commissioner Spencer R. Moore appreciates the thorough investigation conducted by the GBI. DDS policy is and has always been to treat all customers with dignity and respect. The investigation provided valuable information concerning the handling of Mr. Caban Gonzalez's case. It was determined that the investigation of this case did not follow appropriate DDS protocol and as a result the following actions have been taken:

Reorganization of the DDS Office of Investigative Services (OIS)

- Appropriate Personnel Actions have been taken
 - The Director of OIS resigned from his position and will be demoted to a non-law enforcement role.
 - The Deputy Director of OIS was terminated.
- Internal policy changes have been updated to provide for enhanced transparency, case management, and oversight.
- Improvements include providing timely updates for customers, initiating a time limit for investigations, providing customers frequent updates on their case and providing information to the customer about any appeal rights which may be applicable to their situation.
- Language interpretation and translation, which has been available to customers in multiple languages since the Agency's existence, will continue through our Title VI Program.
- Commissioner Moore reiterated that The "Puerto Rican Interview Guide" originally provided prior to 2003 by the Diplomatic Security Service, should never be used by DDS staff, under any circumstances, as it is not an authorized DDS document.
- The OIS Division will be required to receive additional comprehensive investigations training.

We will continue to make efforts to enhance DDS policy and communication for all investigations while preventing any potential fraud or breach in homeland security.

The handling of this case does not represent our agency; we will continue to serve our customers with integrity, dignity, and respect.

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SUMMARY AND FINDINGS OF FACT

On Monday, July 29, 2019, GEORGIA DEPARTMENT OF DRIVER'S SERVICES COMMISSIONER SPENCER MOORE made a request to the GEORGIA BUREAU OF INVESTIGATION (GBI) for assistance in an internal/administrative investigation. GOVERNOR BRIAN KEMP had directed the GEORGIA DEPARTMENT OF DRIVER'S SERVICES (DDS) to conduct a full investigation into the allegations surrounding the arrest and investigation of KENNETH CABAN GONZALEZ. The investigation would also focus on the general creation, use and directives related to a document entitled "Puerto Rican Interview Guide". GEORGIA BUREAU OF INVESTIGATION DIRECTOR VICTOR REYNOLDS directed GBI OFFICE OF PROFESSIONAL STANDARDS DIRECTOR FRED MAYS to conduct the internal/administrative investigation on behalf of DDS.

GEORGIA DEPARTMENT OF DRIVER'S SERVICES GENERAL COUNSEL ANGELIQUE MCCLENDON provided DIRECTOR MAYS a series of documents that included emails, DDS Manager's Bulletins, memorandums, and various awareness bulletins from various law enforcement agencies. COUNSEL MCCLENDON provided these documents to DIRECTOR MAYS to assist him in conducting the internal/administrative investigation. Many of the documents that were released to DIRECTOR MAYS by COUNSEL MCCLENDON were in reference to fraudulent Puerto Rican birth certificates. There were also numerous documents and alert memos from the UNITED STATES DEPARTMENT OF STATE in reference to stolen and fraudulent Puerto Rican birth certificates. Also contained in the documents released to DIRECTOR MAYS by COUNSEL MCCLENDON were alerts and intelligence bulletins from HOMELAND SECURITY INVESTIGATIONS (HSI) /ICE in reference to Puerto Rican birth certificates.

It was a general practice of the DEPARTMENT OF DRIVER'S SERVICES to submit documents that originated from Puerto Rico by individuals who had not been previously issued an ID Card or Driver's License in Georgia to DDS OFFICE OF INVESTIGATIVE SERVICES (OIS) to verify the legitimacy of the documents and/or the identity of the individual. Many of the DDS Investigators utilized the Puerto Rican Interview Guide questionnaire to validate the individual's domicile. It was discovered during DIRECTOR MAYS' investigation that most of the investigators that were using the Puerto Rican Interview Guide were using an outdated version of the guide. For example, one of the questions in the Puerto Rican Interview Guide under the political section is "Who is the current Governor of Puerto Rico?" The answer in the Puerto Rican Interview Guide was PEDRO ROSSELLO. The answer to that question is outdated and according to DIRECTOR MAYS' research during the investigation, GOVERNOR PEDRO ROSSELLO was the Governor of Puerto Rico from 1996 to 2000. According to DDS DEPUTY DIRECTOR OF INVESTIGATION LANCE TAYLOR, the DDS no longer review the documents of individuals who present documents from Puerto Rico and question them to validate their domicile. DD TAYLOR advised that DDS stopped that practice in December 2017 after a townhall meeting with local officials and the community in Hinesville, Georgia. The practice of submitting the documents of individuals seeking first issuance of a Georgia Driver's License or ID Card to DDS OFFICE OF INVESTIGATIVE SERVICES was discontinued upon the issuance of a Manager's Bulletin dated December 21, 2017. The Manager's Bulletin advised employees at the local DDS offices to only send Puerto Rican documents to the DDS OFFICE OF INVESTIGATIVE SERVICES if fraud was suspected. (Exhibit #2)

According to the many documents, alert bulletins, Manager's Bulletins, and pages of emails that DIRECTOR MAYS received from DDS GENERAL COUNSEL ANGELIQUE MCCLENDON in reference to fraudulent Puerto Rican birth certificates, it was a necessary practice to validate the domicile of individuals who stated that they were from Puerto Rico when they applied for first issuance of Driver's License or ID Card.

One of COMMISSIONER MOORE'S request from the GBI internal/administrative investigation was to establish the creation, use and directive related to the Puerto Rican Interview Guide. DIRECTOR MAYS contacted RESIDENT AGENT IN CHARGE, NORMAN RAMIREZ-SEDA in San Juan, Puerto Rico. RAMIREZ-SEDA is the RESIDENT AGENT IN CHARGE (RAC) with the UNITED STATES DEPARTMENT OF STATE, DIPLOMATIC SECURITY SERVICES located in San Juan, Puerto Rico. The reason DIRECTOR MAYS contacted RAC RAMIREZ-SEDA was to establish the origination of the Puerto Rican Interview Guide. DIRECTOR MAYS had viewed an email dated March 13, 2018 from RICHARD HAYS in reference to questions to validate individuals who claimed to be from Puerto Rico. RICHARD HAYS, at that time was the RESIDENT AGENT IN CHARGE (RAC) of the DIPLOMATIC SECURITY SERVICES in San Juan, Puerto Rico. RAC HAYS stated in his email that the interview guide was developed by SPECIAL AGENT WALTER RIOS to assist in determining the validity of a subject's claim to be from Puerto Rico and thus a United States citizen. RAC HAYS stated in his memo that the guide was meant to be used as a resource and is not all encompassing. (EXHIBIT #2) After DIRECTOR MAYS had contacted RAC RAMIREZ-SEDA on September 25, 2019, RAC RAMIREZ-SEDA advised DIRECTOR MAYS that RAC HAYS had retired and he had taken RAC HAYS' position as the RESIDENT AGENT

IN CHARGE in the SAN JUAN DIPLOMATIC SECURITY SERVICES office. DIRECTOR MAYS forwarded three versions of the Puerto Rican Interview Guide to RAC RAMIREZ-SEDA that DIRECTOR MAYS had received from DDS OIS Investigators. DIRECTOR MAYS asked RAC RAMIREZ-SEDA if he could identify the three versions of the Puerto Rican Interview Guide. (Exhibit #19) The first Puerto Rican Interview Guide that DIRECTOR MAYS forwarded to RAC RAMIREZ-SEDA contained as a cover sheet with a DDS logo and questions in reference to Puerto Rico. The second Puerto Rican Interview Guide that DIRECTOR MAYS forwarded to RAC RAMIREZ-SEDA had a cover sheet with DIPLOMATIC SECURITY SERVICES, PUERTO RICAN INTERVIEW GUIDE and questions in reference to Puerto Rico. The third Puerto Rican Interview Guide that DIRECTOR MAYS forwarded to RAC RAMIREZ-SEDA did not contain a cover sheet and was labeled Unclassified Puerto Rican Interview Guide. The first two Puerto Rican Interview Guides that DIRECTOR MAYS forwarded to RAC RAMIREZ-SEDA contained the question, "Who is the current governor of Puerto Rico?" with the answer being PEDRO ROSSELLO. The third version of the Puerto Rican Interview Guide that was labeled Unclassified Puerto Rican Interview Guide did not contain the question, "Who is the current governor of Puerto Rico?" On October 9, 2019, RAC RAMIREZ-SEDA contacted DIRECTOR MAYS with his results of the identification of the three versions of the Puerto Rican Interview Guide that DIRECTOR MAYS had forwarded to him. RAC RAMIREZ-SEDA explained to DIRECTOR MAYS that he nor his staff recognized the first two versions of the Puerto Rican Interview Guide that DIRECTOR MAYS had forwarded to him; the guide with the DDS logo on it and the guide with the DIPLOMATIC SECURITY SERVICES as a cover sheet. RAC RAMIREZ-SEDA advised DIRECTOR MAYS that the

second version of the Puerto Rican Interview Guide with the cover sheet DIPLOMATIC SECURITY SERVICES was not a working document ever used by his office or his staff. RAC RAMIREZ-SEDA stated that one of his staff members did recognize some of the questions contained in version number two of the document, but the questions were never formatted like they were formatted in the version that DIRECTOR MAYS had sent him. RAC RAMIREZ-SEDA stated that one of his Criminal Investigators assigned to his office did recognize version number three of the Puerto Rican Interview Guide questionnaire. The Criminal Investigator had reviewed the questionnaire back in 2015 when he was asked to do so by US DEPARTMENT OF STATE, DIPLOMATIC SECURITY SERVICES HEADQUARTERS. RAC RAMIREZ-SEDA stated that he and his staff were not aware that the Puerto Rican Interview Guide questionnaire had been shared with outside agencies. RAC RAMIREZ-SEDA stated that the Puerto Rican Interview Guide questionnaire is no longer in use by his office or his investigators.

Out of the 21 current and former DDS employees that DIRECTOR MAYS interviewed during the course of this investigation, no one knew where the Puerto Rican Interview Guide originated from or who placed the DDS logo as a cover sheet on the Puerto Rican Interview Guide. The majority of the employees that were interviewed by DIRECTOR MAYS stated that the Puerto Rican Interview Guide questionnaire was given to them by a supervisor or a co-worker when they first started working with DDS. The majority of the employees stated that when they utilized the Puerto Rican Interview Guide, they would only ask the individuals certain questions from the questionnaire and they would not ask the individuals all the questions that are contained in the Puerto Rican Interview Guide.

During this investigation, DIRECTOR MAYS interviewed 21 current and former employees of the GEORGIA DEPARTMENT OF DRIVER'S SERVICES. DIRECTOR MAYS also interviewed SONYA ORTIZ who is with the DEPARTMENT OF HOMELAND SECURITY/ICE in San Juan, Puerto Rico, NORMAN RAMIREZ-SEDA who is the RESIDENT AGENT IN CHARGE, U.S. DEPARTMENT OF STATE DIPLOMATIC SECURITY SERVICES in San Juan, Puerto Rico, and SAMANTHA ASHDOWN who is the VICTIM/WITNESS COORDINATOR with the ATLANTIC JUDICIAL CIRCUIT DISTRICT ATTORNEY'S OFFICE in Hinesville, Georgia.

COMMISSIONER SPENCER MOORE also requested the GEORGIA BUREAU OF INVESTIGATION to investigate the allegations surrounding the arrest and investigation of KENNETH CABAN GONZALEZ. During the course of the investigation by DIRECTOR FRED MAYS involving KENNETH CABAN GONZALEZ the following facts were discovered;

- On July 17, 2017, JAMES WOO was hired as an Investigator I with the GEORGIA DEPARTMENT OF DRIVER'S SERVICES. At some point INVESTIGATOR WOO was given a document titled Puerto Rican Interview Guide by his supervisor and training officer, GREG DIAL, to assist him in potential fraud investigations in reference to individuals claiming to be from Puerto Rico.
- On October 4, 2017, an individual by the name of MICHAEL LASALLE BOGDANICH entered the Hinesville, Georgia, GA DDS OFFICE and attempted to obtain a Georgia ID Card. MICHAEL LASALLE BOGDANICH'S documents were retained. According to INVESTIGATOR WOO, MICHAEL LASALLE BOGDANICH AND KENNETH CABAN GONZALEZ share the same address.

- On October 13, 2017, MICHAEL LASALLE BOGDANICH was interviewed by INVESTIGATOR JAMES WOO. MICHAEL LASALLE BOGDANICH failed to answer 11 out of the 18 questions that INVESTIGATOR WOO asked him from the Puerto Rican Interview Guide.
- On October 31, 2017, KENNETH CABAN GONZALEZ entered the Hinesville, Georgia, GA DDS OFFICE and completed an application for a Georgia Driver's License. KENNETH CABAN GONZALEZ'S documents were retained, and the investigation was given to INVESTIGATOR WOO to investigate.
- On November 2, 2018, INVESTIGATOR WOO contacted CABAN GONZALES to set up an interview for November 8, 2018. CABAN GONZALES never showed up for the interview and was never interviewed by or questioned by INVESTIGATOR WOO or any other DDS employee.
- On November 7, 2017, INVESTIGATOR WOO sent MICHAEL LASALLE BOGDANICH'S AND KENNETH CABAN GONZALEZ'S documents to his supervisor, GREG DIAL, to get his opinion if the documents were genuine. SUPERVISOR DIAL responded to INVESTIGATOR WOO, "The documents do not appear to be legitimate". (Exhibit #9)
- On November 15, 2017, upon approval from his supervisor, GREG DIAL, INVESTIGATOR WOO obtained arrest warrants for KENNETH CABAN GONZALEZ for forgery and false statements and writing. KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH were arrested by INVESTIGATOR WOO when they entered the Savannah DDS office to retrieve their documents.

- On November 22, 2017, INVESTIGATOR ANTHONY KNOTTS received an email from CARL LICHVARCIK, OPERATIONS SECTION CHIEF (OSC), HOMELAND SECURITY INVESTIGATIONS FORENSIC LABORATORY. OSC LICHVARCIK advised INVESTIGATOR KNOTTS that the verification process to verify Puerto Rican birth certificates had changed and is no longer valid. (Exhibit #3)
- On December 1, 2017, DDS INVESTIGATOR ANTHONY KNOTTS advised INVESTIGATOR WOO and SUPERVISOR DIAL that he had been informed that the security features that was used to verify and authenticate Puerto Rican birth certificates were no longer accurate to verify Puerto Rican birth certificates.
- On December 28, 2017, MICHAEL LASALLE BOGDANICH'S and KENNETH CABAN GONZALEZ'S Puerto Rican documents were sent to HOMELAND SECURITY'S lab to be authenticated per DDS DEPUTY DIRECTOR LANCE TAYLOR and DIRECTOR RICK MILLER.
- February 1, 2018, thru August 10, 2018, INVESTIGATOR WOO sent multiple emails to INVESTIGATOR KNOTTS for updated status on KENNETH CABAN GONZALEZ'S and MICHAEL LASALLE BOGDANICH'S documents that were sent to HOMELAND SECURITY. (Exhibit #9)
- On July 16, 2018 and July 23, 2018, HOMELAND SECURITY FORENSIC LAB verified that MICHAEL LASALLE BOGDANICH'S and KENNETH CABAN GONZALEZ'S documents were genuine, but MICHAEL LASALLE BOGDANICH ID Card could not be verified. (Exhibit #9)

- August 10, 2018 INVESTIGATOR KNOTTS advised INVESTIGATOR WOO that KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH documents were authentic.
- On November 21, 2018, INVESTIGATOR WOO received a call from the LIBERTY COUNTY DISTRICT ATTORNEY'S OFFICE in reference to MICHAEL LASALLE BOGDANICH'S and KENNETH CABAN GONZALEZ'S case. INVESTIGATOR WOO contacted DD LANCE TAYLOR and advised DD TAYLOR that the DA's Office was inquiring about the charges pending KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. INVESTIGATOR WOO stated to DD TAYLOR, "So question....an assist from the DA office in Hinesville called about those PBRs from last year that turned out to be valid which TONY verified. We are going to withdraw those charges correct. Just wanted to double check". DD TAYLOR replied, "Did you tell them that"? DD TAYLOR advised INVESTIGATOR WOO, "Ok.... we will discuss it. Thanks" (Exhibit #9)
- On November 28, 2018, INVESTIGATOR WOO received KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH documents back from INVESTIGATOR KNOTTS.
- On November 28, 2018, MICHAEL LASALLE BOGDANICH entered the Savannah DDS office and applied for a Georgia ID Card. MICHAEL LASALLE BOGDANICH produced a Puerto Rican birth certificate, social security card and a health insurance card as his ID. INVESTIGATOR WOO approved MICHAEL LASALLE BOGDANICH to receive the Georgia ID Card after INVESTIGATOR WOO'S supervisor at the time, JARED SMITH, cleared the request.

- On December 12, 2018, DIRECTOR RICK MILLER contacted PAUL STEIER, AAMVA seeking a law enforcement contact in Puerto Rico to get MICHAEL LASALLE BOGDANICH'S AND KENNETH CABAN GONZALEZ'S Driver's License verified with photo ID. (Exhibit #2)
- On December 13, 2018, PAUL STEIER replied to DIRECTOR MILLER'S request and gave DIRECTOR MILLER the contact information for ALEJITA SANTOS in Puerto Rico as a law enforcement contact. (Exhibit #2)
- On December 13, 2018, INVESTIGATOR WOO was advised by DEPUTY DIRECTOR TAYLOR and DIRECTOR MILLER to contact ALEJITA SANTOS in Puerto Rico to obtain Driver's License photos of KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. (Exhibit #9)
- On January 8, 2019, INVESTIGATOR JAMES WOO emailed ALEJITA SANTOS TURULL in Puerto Rico to obtain a Driver's License photograph of MICHAEL LASALLE BOGDANICH and KENNETH CABAN GONZALEZ. There is no other documented contact between INVESTIGATOR WOO and SANTOS after this date. This was also the last documented investigative act in reference to the investigation of KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH by DDS. (Exhibit #9)
- On January 17, 2019, KENNETH CABAN GONZALEZ entered the Hinesville, Georgia, GA DDS OFFICE and applied for a Georgia ID Card. LICENSE EXAMINER MARQUITA JONES contacted INVESTIGATOR WOO and INVESTIGATOR WOO contacted DEPUTY DIRECTOR TAYLOR. DEPUTY

DIRECTOR TAYLOR authorized EXAMINER JONES to issue KENNETH CABAN GONZALEZ a Georgia ID Card. (Exhibit #2)

- On March 12, 2019, DDS DEPUTY DIRECTOR LANCE TAYLOR contacted SAMANTHA ASHDOWN with the ATLANTIC JUDICIAL CIRCUIT DISTRICT ATTORNEY'S OFFICE and requested dismissal of the charges pending against KENNETH CABAN GONZALEZ.
- On July 2, 2019, KENNETH CABAN GONZALEZ filed a lawsuit in the UNITED STATES DISTRICT COURT for the NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION on GEORGIA DEPARTMENT OF DRIVER'S SERVICES COMMISSIONER SPENCER MOORE and INVESTIGATOR JAMES WOO.
- On July 25, 2019, DDS DEPUTY DIRECTOR LANCE TAYLOR once again contacted SAMANTHA ASHDOWN, VICTIM/WITNESS COORDINATOR for the ATLANTIC JUDICIAL CIRCUIT DISTRICT ATTORNEY'S OFFICE in Hinesville, Georgia. DD TAYLOR requested ASHDOWN to dismiss the criminal charges pending against MICHAEL LASALLE BOGDANICH.
- On July 29, 2019, GEORGIA DEPARTMENT OF DRIVER'S SERVICES COMMISSIONER SPENCER MOORE requested GBI's assistance in an administrative/internal investigation involving the investigation and arrest of KENNETH CABAN GONZALEZ and the creation and origination of a document titled "Puerto Rican Interview Guide". (Exhibit #2)
- On July 29, 2019, letters were sent out to DDS personnel in reference to an internal/administrative investigation being conducted by the GEORGIA BUREAU OF INVESTIGATION. (Exhibit #2)

- August 1, 2019 through November 4, 2019, DIRECTOR FRED MAYS conducted interviews in reference to the DDS internal/administrative investigation.

DIRECTOR FRED MAYS recorded all interviews of all the DDS employees and former employees that DIRECTOR MAYS interviewed. The interviews conducted by DIRECTOR MAYS with SONYA ORTIZ, SAMANTHA ASHDOWN and NORMAN RAMIREZ-SEDA were not recorded. The individuals that DIRECTOR MAYS interviewed stated essentially the following;

- ANTHONY KNOTTS – INVESTIGATOR ANTHONY KNOTTS has worked for the GEORGIA DEPARTMENT OF DRIVER’S SERVICES for approximately 14 years. He is currently assigned to the ICE TASK FORCE of HOMELAND SECURITY. INVESTIGATOR KNOTTS has been assigned to the ICE TASK FORCE at HOMELAND SECURITY since February of 2015. Sometime around December of 2017, INVESTIGATOR KNOTTS met with INVESTIGATOR JAMES WOO in Macon, Georgia and INVESTIGATOR WOO released to INVESTIGATOR KNOTTS documents belonging to KENNETH CABAN GONZALES and MICHAEL LASALLE BOGDANICH. INVESTIGATOR KNOTTS was asked to send the documents to the HOMELAND SECURITY FORENSIC LABORATORY to be authenticated. It was the decision of DDS DIRECTOR OF INVESTIGATIONS, RICK MILLER and DDS DEPUTY DIRECTOR OF INVESTIGATIONS, LANCE TAYLOR to have INVESTIGATOR KNOTTS send the documents to the HOMELAND SECURITY LABORATORY to be analyzed. This was the first time that INVESTIGATOR KNOTTS was asked to send documents to be authenticated. When INVESTIGATOR KNOTTS received the documents from INVESTIGATOR

WOO, INVESTIGATOR KNOTTS viewed the documents through the plastic bags and the documents appeared to be authentic. INVESTIGATOR KNOTTS received the results from MICHAEL LASALLE BOGDANICH'S and KENNETH CABAN GONZALEZ'S documents from the HOMELAND SECURITY FORENSIC LAB in August of 2018. All the documents that were sent to the laboratory by INVESTIGATOR KNOTTS were verified to be authentic except a spelling on one of the Drivers' Licenses. INVESTIGATOR KNOTTS released the documents back to INVESTIGATOR WOO on November 28, 2018. After INVESTIGATOR KNOTTS received word from the HOMELAND SECURITY LABORATORY that the documents were authentic, INVESTIGATOR KNOTTS advised INVESTIGATOR WOO and INVESTIGATOR WOO'S Supervisor, GREG DIAL. There was only one document that could not be verified, and it was either a Driver's License or an ID Card from Puerto Rico.

INVESTIGATOR KNOTTS has never seen the Puerto Rican Interview Guide with the cover sheet DDS on it until May of 2019. INVESTIGATOR KNOTTS has seen the Puerto Rican Interview Guide with the DIPLOMATIC SECURITY SERVICE logo on it but it was only when he was in training. INVESTIGATOR KNOTTS has never utilized the Puerto Rican Interview Guide when he was investigating potential fraud cases in reference to Puerto Rico. INVESTIGATOR KNOTTS would ask certain questions about Puerto Rico to the individuals he was interviewing to determine if they were from Puerto Rico or not. The reason the questions were asked about Puerto Rico was to prevent fraud. There have been many cases

where birth certificates have fallen into the hands of illegal aliens who were trying to pose as U.S. citizens. Instead of utilizing the Puerto Rican Interview Guide, INVESTIGATOR KNOTTS developed questions of his own and has utilized Google Translate to assist him with the questions. DDS DEPUTY DIRECTOR LANCE TAYLOR had asked INVESTIGATOR KNOTTS to obtain an updated version of the Puerto Rican Interview Guide. INVESTIGATOR KNOTTS contacted KAREN TURNER who works for the STATE DEPARTMENT. TURNER emailed INVESTIGATOR KNOTTS a copy of the Puerto Rican Interview Guide in March of 2018. INVESTIGATOR KNOTTS passed along the Puerto Rican Interview Guide that he had received from TURNER to DEPUTY DIRECTOR TAYLOR.

INVESTIGATOR KNOTTS feels that INVESTIGATOR WOO should not have rushed and obtained warrants for KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. INVESTIGATOR KNOTTS feels that you need to do all your homework before you make an arrest.

- CALVIN HEARD – CALVIN HEARD has been an INVESTIGATOR with the GEORGIA DEPARTMENT OF DRIVER'S SERVICES for 7 years and 3 months. After INVESTIGATOR HEARD had been with DDS for a couple of years, he was given a copy of the Puerto Rican Interview Guide by DEPUTY DIRECTOR LANCE TAYLOR to be utilized when interviewing individuals from Puerto Rico. INVESTIGATOR HEARD used the Puerto Rican Interview Guide on an average 25 to 30 times. INVESTIGATOR HEARD did not use every question from the Puerto Rican Interview Guide, only a select few.

- CINDY BOYD – CINDY BOYD has worked for the GEORGIA DEPARTMENT OF DRIVER'S SERVICES for approximately 12 years. BOYD'S current title is LEVEL II BUSINESS MANAGER at DDS. When BOYD first started working for DDS, part of her job duties was to assign cases to investigators, until she was promoted to supervisor in a different division. BOYD is not familiar with the case involving KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. It was BOYD'S understanding that the investigators at DDS were interviewing everyone who had not been issued a license in the state of Georgia or another state. BOYD was told the reason investigators were interviewing the individuals from Puerto Rico was because at some point there was a problem with people bringing valid Puerto Rican birth certificates, but the birth certificates did not belong to the person that was bringing them in. The individuals were from another country. They were fraudulently given license in someone else's name with a valid document, therefore the interview process was implemented to question people to see if they were actually from Puerto Rico. BOYD has witnessed DDS investigators interview people from Puerto Rico, but she has never seen the Puerto Rican Interview Guide Questionnaire.
- CLYDE BYERS – CLYDE BYERS is an INVESTIGATOR with the GEORGIA DEPARTMENT OF DRIVER'S SERVICES and he first began working at DDS in May of 2008. BYERS left DDS and went to work for the GEORGIA DEPARTMENT OF CORRECTIONS for three and a half years and he came back to work at DDS on June 3, 2019. BYERS left DDS to go to work for DEPARTMENT OF CORRECTIONS in October 2015, so he was not employed with DDS during the

arrest/investigation of KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. When BYERS first started working for DDS, the Puerto Rican Interview Guide was being utilized by investigators. BYERS has utilized the Puerto Rican Interview Guide on many occasions while conducting investigations. The Puerto Rican Interview Guide was very helpful for BYERS and it assisted him in making a number of arrests for people that were purporting to be from Puerto Rico but actually they were from another country. When BYERS utilized the Puerto Rican Interview Guide, he would pick out random questions from the guide. Since BYERS has been back with DDS, the Puerto Rican Interview Guide is no longer being used to interview people from Puerto Rico. BYERS does not know the origin of the Puerto Rican Interview Guide or when it was first introduced to DDS.

- DANNY SMITH – DANNY SMITH is an INVESTIGATOR with the GEORGIA DEPARTMENT OF DRIVER'S SERVICES, and he has worked at DDS since 2007. INVESTIGATOR SMITH has never seen the DDS Puerto Rican Interview Guide, but he was given the Puerto Rican Interview Guide with the DIPLOMATIC SECURITY SERVICE cover sheet on it when he first started working at DDS in 2007. INVESTIGATOR SMITH was given the DIPLOMATIC SECURITY SERVICE Puerto Rican Interview Guide by his supervisor at the time, DAVID POSEY. POSEY retired in 2012. INVESTIGATOR SMITH did not use all the questions in the Puerto Rican Interview Guide because some of them were too difficult to answer. INVESTIGATOR SMITH does not know who put the DDS logo on the DIPLOMATIC SECURITY SERVICE Puerto Rican Interview Guide Questionnaire. INVESTIGATOR SMITH was not involved in the arrest/investigation of KENNETH

CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. From what INVESTIGATOR SMITH has heard about the KENNETH CABAN GONZALEZ / MICHAEL LASALLE BOGDANICH investigation, he would have been more cautious before taking out the charges on them.

- JAMES WOO – JAMES WOO is an INVESTIGATOR with the GEORGIA DEPARTMENT OF DRIVER'S SERVICES. INVESTIGATOR WOO has worked for the DEPARTMENT OF DRIVER'S SERVICES since July of 2017. When INVESTIGATOR WOO was first hired at DDS his supervisor, GREG DIAL, gave him a copy of a document titled Puerto Rican Interview Guide. SUPERVISOR DIAL advised INVESTIGATOR WOO to utilize the guide whenever he suspected fraud in reference to Puerto Rican Birth Certificates. INVESTIGATOR WOO has utilized the Puerto Rican Interview Guide more than 50 times during his career with DDS. INVESTIGATOR WOO did not use the Puerto Rican Interview Guide when he was investigating KENNETH CABAN GONZALEZ because KENNETH CABAN GONZALEZ would not come in for an interview. INVESTIGATOR WOO did utilize the questionnaire when he interviewed MICHAEL LASALLE BOGDANICH. KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH were roommates. On October 4, 2017, MICHAEL LASALLE BOGDANICH entered the DDS OFFICE in Hinesville, Georgia and attempted to obtain a Georgia ID Card. At that time, MICHAEL LASALLE BOGDANICH'S documents were retained for further investigation. INVESTIGATOR WOO was assigned the investigation. On October 13, 2017, INVESTIGATOR WOO interviewed MICHAEL LASALLE BOGDANICH utilizing the Puerto Rican Interview Guide. MICHAEL LASALLE

BOGDANICH answered 11 out of the 18 questions that INVESTIGATOR WOO asked him incorrectly. On October 31, 2017, KENNETH CABAN GONZALEZ entered the Hinesville, Georgia, GA DDS OFFICE and completed an application for a Georgia Driver's License. KENNETH CABAN GONZALEZ'S documents were also retained for further investigations per DDS protocol. INVESTIGATOR WOO sent MICHAEL LASALLE BOGDANICH'S and KENNETH CABAN GONZALEZ'S documents to his supervisor, GREG DIAL, for examination. Based on INVESTIGATOR WOO'S training he felt that the documents were fraudulent. SUPERVISOR DIAL advised INVESTIGATOR WOO that the documents seemed to be fraudulent and for INVESTIGATOR WOO to take arrest warrants on MICHAEL LASALLE BOGDANICH and KENNETH CABAN GONZALEZ. INVESTIGATOR WOO obtained warrants for KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH for false statements and writings and forgery. INVESTIGATOR WOO arrested KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH on November 15, 2017, when they came to the Savannah DDS OFFICE to retrieve their documents. INVESTIGATOR WOO was advised around the 1st of December 2017 that the process of authenticating Puerto Rican documents that they were using at DDS were no longer valid. DEPUTY DIRECTOR LANCE TAYLOR advised INVESTIGATOR WOO to send the documents to the HOMELAND SECURITY LABORATORY to be verified. MICHAEL LASALLE BOGDANICH'S and KENNETH CABAN GONZALEZ'S documents were sent to HOMELAND SECURITY FORENSIC LABATORY to be verified. INVESTIGATOR WOO received information that MICHAEL LASALLE

BOGDANICH and KENNETH CABAN GONZALEZ documents had been verified to be authentic by the HOMELAND SECURITY LABORATORY. The only thing that was not verified was MICHAEL LASALLE BOGDANICH'S ID Card that was sent with the other documents.

On November 21, 2018, INVESTIGATOR WOO received an email from the Hinesville, Georgia DISTRICT ATTORNEY'S OFFICE inquiring about the status of the charges pending against MICHAEL LASALLE BOGDANICH and KENNETH CABAN GONZALEZ. INVESTIGATOR WOO at that time contacted DEPUTY DIRECTOR LANCE TAYLOR and stated to TAYLOR, "Since the documents came back verified authentic from the HOMELAND SECURITY LABORATORY, they were going to drop the charges on MICHAEL LASALLE BOGDANICH and KENNETH CABAN GONZALEZ, correct?" DD TAYLOR responded to INVESTIGATOR WOO, "You didn't tell them that, did you?" INVESTIGATOR WOO told DD TAYLOR, "No" and TAYLOR told INVESTIGATOR WOO that they would discuss it. INVESTIGATOR WOO was advised to contact a law enforcement official in Puerto Rico to verify KENNETH CABAN GONZALEZ'S and MICHAEL LASALLE BOGDANICH'S identification. (Exhibit #9)

After the arrest of KENNETH CABAN GONZALEZ, KENNETH CABAN GONZALEZ came back to the Hinesville, Georgia, GA DDS OFFICE to obtain a Georgia ID Card and DEPUTY DIRECTOR LANCE TAYLOR authorized KENNETH CABAN GONZALEZ to be issued an ID Card. INVESTIGATOR WOO

authorized MICHAEL LASALLE BOGDANICH to be issued an ID Card after his arrest with approval from his supervisor at that time.

When INVESTIGATOR WOO first started his employment with DDS, he was made aware of an incident that happened with his supervisor, GREG DIAL. The incident was a racial discrimination issue. SUPERVISOR DIAL had a bumper sticker in his cubicle when he was assigned to the Conyers, Georgia location. The sticker was an illegal alien permit bumper sticker that read, "You may hunt day or night with or without dogs around borders, poultry plants, onion fields, farms, citric groves, construction sites, goats, low riders, tunnels, packing plants. You can use Coronas, Jose Cuervo, burritos as bait. No bag limit or tagging required." INVESTIGATOR WOO did not personally see the bumper sticker but was told about it when he started working at DDS. Another incident that happened with SUPERVISOR DIAL was when INVESTIGATOR WOO and other DDS investigators were in a use-of-force training class being taught by INVESTIGATOR DANNY SMITH. INVESTIGATOR WOO overheard SUPERVISOR DIAL discuss how a particular Police Chief got his job. SUPERVISOR DIAL made the comment that the Police Chief, who was of Middle Eastern descent, put the City Council Member in a camel cod choke hold. INVESTIGATOR WOO felt that was a racial biased comment, "camel cod lock choke hold." INVESTIGATOR WOO reported SUPERVISOR DIAL because he felt that SUPERVISOR DIAL was influencing his cases. INVESTIGATOR WOO felt that SUPERVISOR DIAL was influencing him to take charges on people of color. INVESTIGATOR WOO has witnessed SUPERVISOR

DIAL make racial comments in reference to minorities in the past. INVESTIGATOR WOO made his complaint on SUPERVISOR DIAL to the HUMAN RESOURCE DEPARTMENT and they conducted an internal investigation. After the investigation, SUPERVISOR DIAL was terminated from DDS.

- JARED SMITH – JARED SMITH is an INVESTIGATOR with the GEORGIA DEPARTMENT OF DRIVER'S SERVICES. INVESTIGATOR SMITH has worked for DDS for approximately 5 years. INVESTIGATOR SMITH was told that there were at one time 10,000 or more Puerto Rican birth certificates that was stolen from the island. The Puerto Rican Interview Guide was used as a vetting process for first time issuance of Georgia Driver's License or ID Cards. INVESTIGATOR SMITH never used the guide per se, but he has used portions of the Puerto Rican Interview Guide. INVESTIGATOR SMITH has not had anyone that he was questioning from the Puerto Rican Interview Guide not able to answer the questions. INVESTIGATOR SMITH was advised by DEPUTY DIRECTOR LANCE TAYLOR to utilize the Puerto Rican Interview Guide when INVESTIGATOR SMITH first started working at DDS. One day when INVESTIGATOR SMITH was on desk duty, INVESTIGATOR WOO contacted him and asked for authorization to issue MICHAEL LASALLE BOGDANICH an ID Card and INVESTIGATOR SMITH approved it because MICHAEL LASALLE BOGDANICH'S and KENNETH CABAN GONZALEZ'S documents had been verified to be authentic.
- JOHN KEISER – JOHN KEISER is an INVESTIGATOR with the GEORGIA DEPARTMENT OF DRIVER'S SERVICES. INVESTIGATOR KEISER has worked for the DDS since April of 2012. INVESTIGATOR KEISER was issued a copy of

the Puerto Rican Interview Guide when he was first hired with DDS. INVESTIGATOR KEISER has used the Puerto Rican Interview Guide while conducting investigations, but he only used portions of the guide and not the entire guide. INVESTIGATOR KEISER feels that the Puerto Rican Interview Guide Questionnaire needs to be revamped to make it more germane to the younger generation. INVESTIGATOR KEISER estimates that he has used the Puerto Rican Interview Guide a couple of hundred times during his employment with DDS. The last time INVESTIGATOR KEISER used the Puerto Rican Interview Guide was in 2017. INVESTIGATOR KEISER remembers receiving a memo stating that they were no longer to utilize the Puerto Rican Interview Guide or retain documents of individuals from Puerto Rico. INVESTIGATOR KEISER has received numerous Manager's Bulletins and emails in reference to fraudulent Puerto Rican birth certificates. INVESTIGATOR KEISER was not involved in the investigation and arrest of KENNETH CABAN GONZALEZ or MICHAEL LASALLE BOGDANICH.

- KAREN BROOKS – KAREN BROOKS is an INVESTIGATOR with the GEORGIA DEPARTMENT OF DRIVER'S SERVICES. She has been employed with DDS since 2006. INVESTIGATOR BROOKS was not involved in the arrest and investigation on KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. INVESTIGATOR BROOKS has utilized the Puerto Rican Interview Guide in the past while conducting investigations dealing with individuals that purported to be from Puerto Rico. INVESTIGATOR BROOKS does not ask every question in the Puerto Rican Interview Guide; she picks out random questions depending on what part of Puerto Rico the individual is from. At one-point DDS

was interviewing everyone from Puerto Rico until DDS DIRECTOR OF INVESTIGATIONS RICK MILLER sent out an email advising DDS investigators to stop the interview process.

- KOREY BRYSON – KOREY BRYSON is an INVESTIGATIVE ASSISTANT (IA) at the GEORGIA DEPARTMENT OF DRIVER'S SERVICES. IA BRYSON has worked for DDS since May of 2015. IA BRYSON was not involved in the investigation and arrest of KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. Part of IA BRYSON'S administrative duties are to review cases and determine if fraud is involved and to create a case file. IA BRYSON has been involved with potential fraud cases from Puerto Rico. IA BRYSON has never seen the Puerto Rican Interview Guide questionnaire, but she knows it does exist at DDS. IA BRYSON has heard some of the questions on the Puerto Rican Interview Guide and she is familiar with the interview process in reference to the Puerto Rican Interview Guide. At some point the interview process of utilizing the Puerto Rican Interview Guide stopped. IA BRYSON is not familiar what year DDS stopped utilizing the Puerto Rican Interview Guide to interview people from Puerto Rico.
- LANCE TAYLOR – LANCE TAYLOR is the DEPUTY DIRECTOR OF INVESTIGATION with the GEORGIA DEPARTMENT OF DRIVER'S SERVICES. DD TAYLOR has worked for DDS since April of 2003. DD TAYLOR started as an INVESTIGATOR with DDS. DD TAYLOR is familiar with the arrest and investigation of KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. It has been DD TAYLOR'S experience in the past that many of the

Puerto Rican birth certificates that are used to obtain Georgia Driver's Licenses and ID Cards are authentic, but the birth certificates do not belong to the person that are presenting them. Once DD TAYLOR and DDS found out that the process of authenticating Puerto Rican birth certificates was no longer valid, they could have dismissed the charges on KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH, but DDS wanted to continue to investigate the case. At that point, KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH were both out of jail on bond. DDS was trying to set up an interview with KENNETH CABAN GONZALEZ to see if he was from Puerto Rico or not. DD TAYLOR feels that there was enough probable cause for INVESTIGATOR WOO to take out warrants on MICHAEL LASALLE BOGDANICH and KENNETH CABAN GONZALEZ because of the training that they had received regarding fraudulent Puerto Rican birth certificates. Looking back at the situation now, DD TAYLOR feels that maybe DDS should have done a little more investigating before the warrants were secured. DD TAYLOR and DIRECTOR OF INVESTIGATION RICK MILLER both discussed sending KENNETH CABAN GONZALEZ'S and MICHAEL LASALLE BOGDANICH'S documents to HOMELAND SECURITY (HSI) FORENSIC LAB to be verified, but ultimately it was DIRECTOR MILLER'S decision to send the documents to the HSI LAB. DD TAYLOR does not remember ever sending any other documents to the HSI LAB to be verified other than KENNETH CABAN GONZALEZ'S and MICHAEL LASALLE BOGDANICH'S documents. The reason DDS sent the documents to the HSI LAB was because DDS had made an arrest on KENNETH CABAN GONZALEZ and MICHAEL

LASALLE BOGDANICH and then they received information that the verification process may not be valid. Once the warrants were taken out on KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH by INVESTIGATOR WOO, the charges were in the hands of the LIBERTY COUNTY DISTRICT ATTORNEY'S OFFICE. DDS continued to try to authenticate KENNETH CABAN GONZALEZ'S and MICHAEL LASALLE BOGDANICH'S documents in order to support the arrest warrants that had been secured against them. When INVESTIGATOR KNOTTS advised DDS that the birth certificates were authentic, INVESTIGATOR WOO asked TAYLOR if they were going to dismiss the warrants on KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. DD TAYLOR advised INVESTIGATOR WOO that they were not going to dismiss the charges yet because he did not have enough information and they needed to discuss it. Just because the documents came back genuine, it did not push DD TAYLOR to a sense of urgency to drop the charges. DD TAYLOR contacted the LIBERTY COUNTY DA'S OFFICE and advised them to dismiss the warrants on KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH because they were still unable to validate the documents. DD TAYLOR does not necessarily know that it was unreasonable to dismiss the charges on KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. DD TAYLOR does not think that it was okay for INVESTIGATOR JARED SMITH to authorize INVESTIGATOR WOO to issue MICHAEL LASALLE BOGDANICH a Georgia ID Card because INVESTIGATOR SMITH did not have complete knowledge of the case involving KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH.

When DD TAYLOR first started working at DDS it was a practice of DDS to retain the documents of everyone from Puerto Rico that entered a DDS OFFICE for a first issuance of a Georgia Driver's License or ID Card. The documents were then given to an INVESTIGATOR with DDS to investigate. There were known issues with Puerto Rican identity documents being compromised and it had been an issue for quite a while. The process of retaining documents from individuals claiming to be from Puerto Rico for first issuance stopped in December of 2017. DD TAYLOR doesn't remember if the Puerto Rican Interview Guide questionnaire was in place or not when he first started working for DDS. DD TAYLOR has utilized the Puerto Rican Interview Guide when conducting investigations. When DD TAYLOR used the Puerto Rican Interview Guide questionnaire, he would only ask three or four questions from the questionnaire. DD TAYLOR does not know who put the DDS logo on the Puerto Rican Interview Guide.

- LARRY WAYNE MCDUFFIE – LARRY WAYNE MCDUFFIE is an INVESTIGATOR for the GEORGIA DEPARTMENT OF DRIVER'S SERVICES and he has worked for DDS since 2010. Ever since INVESTIGATOR MCDUFFIE started working for DDS, they have been utilizing the Puerto Rican Interview Guide questionnaire. INVESTIGATOR MCDUFFIE would ask random questions when he was investigating a Puerto Rican case. DIRECTOR RICK MILLER sent out an email around the end of 2017, or the beginning of 2018, to all DDS Investigators to stop conducting the Puerto Rican interviews. INVESTIGATOR MCDUFFIE is not familiar where the Puerto Rican Interview Guide originated from.

- LAURA BAUM – LAURA BAUM has worked for the GEORGIA DEPARTMENT OF DRIVER'S SERVICES for approximately 15 years. BAUM is currently the supervisor over the Hinesville, Georgia, GA DDS OFFICE. The names of MICHAEL LASALLE BOGDANICH and KENNETH CABAN GONZALEZ did not sound familiar to BAUM, but she might have had interaction with them because she is the supervisor of the Hinesville, Georgia office. BAUM has never actually seen the Puerto Rican Interview Guide, but she may have in the past been asked to translate Spanish for one of the Investigators while he was utilizing the Puerto Rican Interview Guide because she is bilingual. As of 2012, a DDS bulletin was issued stating that if a customer came into the DDS office for a Georgia Driver's License or ID Card and they had a Puerto Rican Driver's License and a Puerto Rican birth certificate, a case was generated and given to a DDS investigator. That process ended in 2017.
- LINDA DAVIS – LINDA DAVIS has worked for GEORGIA DEPARTMENT OF DRIVER'S SERVICES since December of 2010. She is an INVESTIGATOR II. INVESTIGATOR DAVIS is familiar with the Puerto Rican Interview Guide and she has utilized it in the past when she conducted fraud investigations. INVESTIGATOR DAVIS would pick out random questions from the guide to ask the individuals. INVESTIGATOR DAVIS does not know where the Puerto Rican Interview Guide originated from.
- MARQUITA JONES – MARQUITA JONES is a LICENSE EXAMINER for the GEORGIA DEPARTMENT OF DRIVER'S SERVICES, and she is assigned to the Hinesville, Georgia, GA DDS OFFICE. On January 17, 2019, DEPUTY

DIRECTOR LANCE TAYLOR emailed MARQUITA JONES at the Hinesville, Georgia, GA DDS OFFICE and advised JONES to go ahead and issue KENNETH CABAN GONZALEZ an ID Card based on the original documents which were located in ONBASE.

- RICHARD MILLER – RICHARD MILLER is the DIRECTOR OF INVESTIGATIONS for the GEORGIA DEPARTMENT OF DRIVER'S SERVICES. DIRECTOR MILLER has been with DDS since September 6, 2006. DIRECTOR MILLER'S recollection of the investigation involving KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH was that they were arrested by INVESTIGATOR JAMES WOO for fraudulent documents. MICHAEL LASALLE BOGDANICH and KENNETH CABAN GONZALEZ were roommates. The documents that KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH produced when they entered the DDS OFFICE to obtain a Driver's License and ID Card, INVESTIGATOR WOO determined to be fraudulent. INVESTIGATOR WOO discussed the fraudulent documents with his supervisor, GREG DIAL, and INVESTIGATOR WOO arrested MICHAEL LASALLE BOGDANICH and KENNETH CABAN GONZALEZ on November 15, 2017. After MICHAEL LASALLE BOGDANICH and KENNETH CABAN GONZALEZ were arrested, SUPERVISOR DIAL and INVESTIGATOR WOO were unsure about their original judgment of the documents presented by KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. DIRECTOR MILLER suggested they send the documents to the HSI/ICE LAB for verification. After the documents were returned from the HSI/ICE LAB as being authentic, DDS made the decision to drop

the warrants on KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. DIRECTOR MILLER does not remember having a conversation with GREG SUPERVISOR DIAL in reference to SUPERVISOR DIAL suggesting that they should drop the charges on MICHAEL LASALLE BOGDANICH and KENNETH CABAN GONZALEZ because the process of authenticating the birth certificate was no longer valid. After KENNETH CABAN GONZALEZ'S and MICHAEL LASALLE BOGDANICH'S documents were verified to be authentic, INVESTIGATOR WOO was trying to contact Puerto Rico's VITAL RECORDS DIVISION to verify KENNETH CABAN GONZALEZ'S and MICHAEL LASALLE BOGDANICH'S identity. Because MICHAEL LASALLE BOGDANICH'S and KENNETH CABAN GONZALEZ'S identity had not been verified, DIRECTOR MILLER made the decision not to dismiss the warrants. MICHAEL LASALLE BOGDANICH and KENNETH CABAN GONZALEZ had been arrested and were out on bond. DIRECTOR MILLER feels that it would have been premature to drop the charges on MICHAEL LASALLE BOGDANICH and KENNETH CABAN GONZALEZ.

The practice of retaining the documents of individuals from Puerto Rico when they entered a DDS OFFICE for a first issuance of a Driver's License or ID Card was in practice when DIRECTOR MILLER started with DDS in 2006. The practice was terminated in December of 2017.

DIRECTOR MILLER had not seen and did not know that DDS FORMER SUPERVISOR, GREG DIAL had a racist sticker in his cubicle at his office in Conyers, Georgia. Based on FORMER SUPERVISOR GREG DIAL'S outward

actions, DIRECTOR MILLER feels that it appears that FORMER SUPERVISOR DIAL is prejudice against minorities. DIRECTOR MILLER had not seen the Puerto Rican Interview Guide until they were processing Open Records requests in reference to the KENNETH CABAN GONZALEZ lawsuit.

- RODRICK WHITE - RODRICK WHITE is an INVESTIGATOR with the GEORGIA DEPARTMENT OF DRIVER'S SERVICES. INVESTIGATOR WHITE has worked for DDS for approximately 5 years. INVESTIGATOR WHITE was not involved in the arrest and investigation involving KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. INVESTIGATOR WHITE has utilized the Puerto Rican Interview Guide approximately 50 or 60 times in the past while he was conducting investigations at DDS. When INVESTIGATOR WHITE first started working for DDS, it was DDS policy for the Investigator to interview anyone from Puerto Rico that came in for a first-time issuance. DDS was already utilizing the Puerto Rican Interview Guide when INVESTIGATOR WHITE was hired at DDS. When INVESTIGATOR WHITE utilized the Puerto Rican Interview Guide, he generally would go through the entire questionnaire with the individual. At some point INVESTIGATOR WHITE received information from DEPUTY DIRECTOR LANCE TAYLOR or DIRECTOR RICK MILLER not to conduct interviews anymore in reference to Puerto Rican's first issuance.
- SANDRA WILLIAMS – SANDRA WILLIAMS is an INVESTIGATOR with the GEORGIA DEPARTMENT OF DRIVER'S SERVICES. INVESTIGATOR WILLIAMS has worked for DDS since December of 2010. INVESTIGATOR WILLIAMS was given a copy of the Puerto Rican Interview Guide when she first

started working at DDS in 2010. INVESTIGATOR WILLIAMS has utilized the guide during her investigations. WILLIAMS does not know where the Puerto Rican Interview Guide originated from. INVESTIGATOR WILLIAMS picked out certain questions from the interview guide to question the individual during her investigations. INVESTIGATOR WILLIAMS was not involved in the investigation/arrest of KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH.

- STANLEY MOORE – STANLEY MOORE is an INVESTIGATOR with the GEORGIA DEPARTMENT OF DRIVER'S SERVICES. INVESTIGATOR MOORE has worked for DDS for approximately 7 years. INVESTIGATOR MOORE was given a copy of the Puerto Rican Interview Guide when he was first hired at DDS. The Puerto Rican Interview Guide was given to INVESTIGATOR MOORE by either DEPUTY DIRECTOR LANCE TAYLOR or ALLEN RUSSELL. RUSSELL does not work with DDS anymore. INVESTIGATOR MOORE occasionally used the Puerto Rican Interview Guide, but he did not rely on the questionnaire too much. INVESTIGATOR MOORE did not always utilize the Puerto Rican Interview Guide during his investigations, only occasionally. INVESTIGATOR MOORE was not involved in the investigation/arrest of KENNETH CABAN GONZALEZ and MICHAEL LASALLE.
- WENDY HILL – WENDY HILL is an INVESTIGATIVE ASSISTANT (IA) WITH THE GEORGIA DEPARTMENT OF DRIVER'S SERVICES. IA HILL has worked for DDS for approximately 13 years. One of IA HILL'S job duties is to create case files. IA HILL is familiar with the Puerto Rican Interview Guide. IA HILL has only utilized

the Puerto Rican Interview Guide one time during her employment with DDS. The one time that IA HILL used the Puerto Rican Interview Guide was when she was working a Saturday shift at DDS.

It is the finding of this investigation that the Puerto Rican Interview Guide originated from the U.S. DEPARTMENT OF STATE DIPLOMATIC SECURITY SERVICES AGENCY. At some point a version of the Puerto Rican Interview Guide was shared with GEORGIA DEPARTMENT OF DRIVER'S SERVICES personnel. According to RESIDENT AGENT IN CHARGE NORMAN RAMIREZ-SEDA, the DIPLOMATIC SECURITY SERVICES in San Juan, Puerto Rico does not utilize the Puerto Rican Interview Guide any longer. RAC RAMIREZ-SEDA advised that he nor his co-workers were aware that the Puerto Rican Interview Guide had been shared with outside agencies. At some point someone attached a DDS logo onto the Puerto Rican Interview Guide. Every DDS employee that DIRECTOR MAYS interviewed during the course of this investigation stated that they had no knowledge of who might have attached the DDS logo to the Puerto Rican Interview Guide. Every DDS INVESTIGATOR that utilized the Puerto Rican Interview Guide was using an outdated version of the questionnaire. For example, one of the questions is "Who is the current governor of Puerto Rico?" The answer listed in the guide was PEDRO ROSSELLO. PEDRO ROSSELLO was the governor of Puerto Rico from 1996 to 2000.

With the many Manager's Bulletins, awareness alerts, information and emails that were provided to DIRECTOR MAYS in the beginning of this investigation, the Puerto Rican

Interview Guide seemed to be a necessary tool to establish the validity of a person claiming to be from Puerto Rico. The finding of this investigation discovered that there was a great deal of fraud and stolen birth certificates occurring in Puerto Rico. The majority of the Manager's Bulletins, awareness alerts, and information emails in reference to fraudulent Puerto Rican documents came from the U.S. DEPARTMENT OF STATE, HOMELAND SECURITY//ICE and the GEORGIA DEPARTMENT OF DRIVER'S SERVICES.

For many years because of the influx of fraudulent documents evolving from Puerto Rico the GEORGIA DEPARTMENT OF DRIVER'S SERVICES initiated a plan to interview and obtain the documents of every person that entered a GEORGIA DEPARTMENT OF DRIVER'S SERVICES OFFICE to obtain a Driver's License or ID Card. After the documents were obtained by the staff at DDS, a DDS INVESTIGATOR would investigate the case to determine if the person was in fact from Puerto Rico. Many times, the DDS INVESTIGATORS would utilize the Puerto Rica Interview Guide to establish the domicile of the individual seeking the Georgia Driver's License or ID Card. There was a townhall meeting in the latter part of 2017 in Hinesville, Georgia and after the townhall meeting DDS discontinued retaining the documents and questioning individuals from Puerto Rico that were seeking a first issuance of a Georgia Driver's License or ID Card.

It is also the finding of this investigation that GEORGIA DEPARTMENT OF DRIVER'S SERVICES DIRECTOR OF INVESTIGATION RICHARD MILLER and DEPUTY

DIRECTOR LANCE TAYLOR did not act in a timely manner in dismissing the charges pending against KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. INVESTIGATOR JAMES WOO who was hired at DDS on July 17, 2017 was the CASE AGENT assigned to the case on KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. INVESTIGATOR WOO felt that KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH had produced fraudulent documents to obtain a Georgia Driver's License/ ID Card. INVESTIGATOR WOO'S supervisor at the time, GREG DIAL, also felt that the documents were fraudulent. SUPERVISOR DIAL advised INVESTIGATOR WOO to take out arrest warrants on KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. INVESTIGATOR WOO arrested KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH on November 15, 2017 and charged them with forgery and false statements and writing. On December 1, 2017, DDS INVESTIGATOR ANTHONY KNOTTS advised INVESTIGATOR WOO and SUPERVISOR DIAL that he had received information that the process of validating Puerto Rican birth certificates that they were taught in training were no longer valid. INVESTIGATOR WOO had used the validation when he determined that the documents that KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH had produced were fraudulent. Instead of dismissing the charges against KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH, DIRECTOR RICK MILLER advised INVESTIGATOR WOO and INVESTIGATOR KNOTTS to send KENNETH CABAN GONZALEZ'S and MICHAEL LASALLE BOGDANICH'S documents to the HOMELAND SECURITY FORENSIC LAB to be validated on December 28, 2017. Because of the backlog at the HOMELAND SECURITY LAB, the results of KENNETH CABAN

GONZALEZ'S and MICHAEL LASALLE BOGDANICH'S documents weren't released until August of 2018. The results of the documents were that they were genuine but the ID Card of MICHAEL LASALLE BOGDANICH could not be verified. Once SUPERVISOR GREG DIAL received the information that the documents were genuine from INVESTIGATOR KNOTTS, SUPERVISOR DIAL stated that he immediately went into DIRECTOR MILLER'S office and advised him of the results and stated to DIRECTOR MILLER that they needed to dismiss the warrants. DIRECTOR MILLER nor DEPUTY DIRECTOR TAYLOR did not want to dismiss the warrants on KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. INVESTIGATOR WOO also felt that the charges pending against KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH should be dismissed. DIRECTOR MILLER and DEPUTY DIRECTOR TAYLOR discussed the KENNETH CABAN GONZALEZ/MICHAEL LASALLE BOGDANICH investigation and decided that they would get a contact in Puerto Rico to verify the identity of KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. On January 8, 2019, INVESTIGATOR WOO emailed ALAJITA SANTOS who is with VITAL RECORDS in Puerto Rico to obtain Driver's License photographs of KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH DDS. That was the last investigative act that was conducted in reference to the investigation/arrest of KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. DIRECTOR MAYS was able to get KENNETH CABAN GONZALEZ'S and MICHAEL LASALLE BOGDANICH'S documents verified in a few weeks during the course of this investigation. SONIA ORTIZ, HSI/ICE, SAN JUAN, PUERTO RICO, verified the documents as genuine for DIRECTOR MAYS. ORTIZ' contact information was contained in the documents that

was given to DIRECTOR MAYS in the beginning of the investigation. No one from DDS contacted ORTIZ to get KENNETH CABAN GONZALEZ'S and MICHAEL LASALLE BOGDANICH'S documents verified.

It is the finding of this investigation that the GEORGIA DEPARTMENT OF DRIVER'S SERVICES failed to follow up and complete the investigation on KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH. Both subjects were arrested on November 15, 2017. The charges on KENNETH CABAN GONZALEZ were not dismissed until March 12, 2019 and the charges pending against MICHAEL LASALLE BOGDANICH were not dismissed until July 24, 2019. Even though KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH had bonded out of jail on the charges that INVESTIGATOR WOO had taken out on them, it took DEPUTY DIRECTOR LANCE TAYLOR approximately 15 months to dismiss the charges on KENNETH CABAN GONZALEZ and it took DEPUTY DIRECTOR TAYLOR approximately 19 months to dismiss the charges on MICHAEL LASALLE BOGDANICH. DEPUTY DIRECTOR TAYLOR only asked the charges to be dismissed after the DDS LEGAL SECTION got involved. DIRECTOR RICHARD MILLER stated during his interview with DIRECTOR MAYS that ultimately the decision to dismiss the charges on KENNETH CABAN GONZALEZ and MICHAEL LASALLE BOGDANICH was his responsibility.

DIRECTOR FRED MAYS
sb: 11/03/2019

Reciprocity for US Territories

#020620-03

EMPLOYEE ACTION for February 6, 2020

After you read this bulletin, place your initials below and pass it to another employee. The last employee to read this bulletin should return it to their supervisor or manager.

CSC Manager Action Required

- 1) Review and discuss with Team Members.
- 2) Ensure that all Team Members are following the same guidelines and procedures.
- 3) **DO NOT** give copies of any Bulletin to customers.

Remember!

- 1) This bulletin may not cover every situation that may arise.
- 2) Before any customer is denied service, please refer customer to a Manager.
- 3) **DO NOT** give Legal's telephone number to customers.
- 4) **DO NOT** give legal advice to customers!

Overview

The purpose of this bulletin is to update Team Members (TM) on the requirements for servicing customers who present documents from US Territories

Knowledge Exams & Road Skills Test

DDS has previously interpreted language in Georgia law to exclude the U.S. territories from statutory exemptions from the knowledge and skills exams. DDS has reviewed existing Georgia law and now interprets the law to extend the exemption to the following U.S. territories:

1. Puerto Rico
2. Guam
3. U.S Virgin Islands
4. American Samoa
5. Northern Mariana Islands/Saipan

Effective February 6, 2020, customers with valid driver's license or licenses that have been expired for less than two years issued by United States territories will be exempt from the knowledge exam and road skills test.
(See attachment for samples of credentials from US territories).

Customers who do not have the physical credentials to present at the time of application will be required to submit a certified driver history report from their home jurisdiction/US territory.

PLEASE NOTE:
Commercial Driver's License (CDL) privileges are not transferable for US Territories.

(FOR INTERNAL USE ONLY)

EMPLOYEE ACTION for February 6, 2020

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CSC Manager Action Required

- 4) Review and discuss with Team Members.
- 5) Ensure that all Team Members are following the same guidelines and procedures.
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Remember!

- 5) This bulletin may not cover every situation that may arise.
- 6) Before any customer is denied service, please refer customer to a Manager.
- 7) **DO NOT** give Legal's telephone number to customers.
- 8) **DO NOT** give legal advice to customers!

Puerto Rico

Please continue to accept Puerto Rican birth certificates issued on or after July 1, 2010, REGARDLESS of whether customers are new to Georgia or currently hold a Georgia license, permit or identification card. **Puerto Rican birth certificates issued before July 1, 2010 will not be accepted.**

- Do not forward Puerto Rican birth certificates to the Office of Investigative Services (OIS) unless fraud is suspected.
- Customers presenting documents originating from Puerto Rico should continue to be treated the same as customers from other US states or D.C.

Title VI reminders:

If any customer expresses that they feel discriminated against, inform them that they can contact our Title VI Anti-discrimination Programs Coordinator. Please refer to the **MB 100716-02 Title VI Compliance** for more information.

Title VI reminders are listed below:

- Title VI brochures must be accessible to the public in the same location as driving manuals and other published materials.
- If an individual requests information about Title VI or nondiscrimination policies, or wishes to file a complaint, direct them to the Title VI brochure, or our public website:

<http://www.dds.georgia.gov/title-vi-and-dds>

Title VI advertisements will continue to air in CSCs on the Motor Vehicle Network (MVN) screens.

- Individuals can submit complaints about suspected discrimination using a Title VI Program Complaint Form, which will be reviewed and investigated by the Program Coordinator.

Contact Us If We Can Help

(FOR INTERNAL USE ONLY)

Business Support Analyst I
BSU Manager

Michael Ishola
Juenesse Holman

[Redacted]

[Redacted]

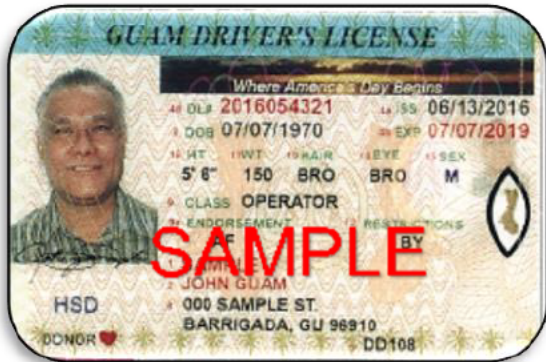
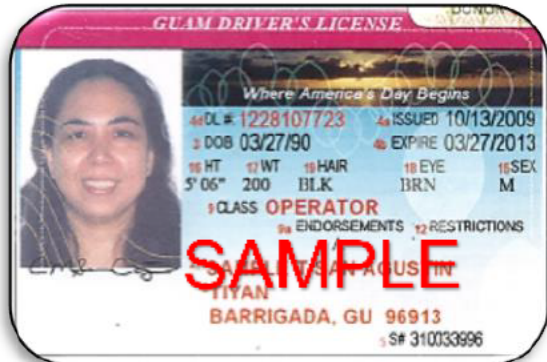
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Sample Puerto Rico Driver's License



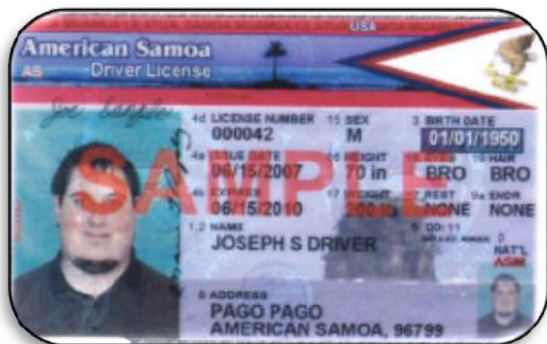
Sample Guam Driver's License



Sample US Virgin Islands Driver's License



Sample American Samoa's Driver License



Sample Northern Mariana Island Driver License. *Issued in Saipan only





Georgia Department of Driver Services

2206 East View Parkway • Conyers, Georgia 30013 • 678.413.8650

Brian P. Kemp
Governor

Spencer R. Moore
Commissioner

December 16, 2019

To: All OIS Investigators, and Investigative support staff
From: Commissioner Spencer R. Moore
RE: "Puerto Rican Interview Guide" – discontinue use

Many of you are aware that there is a pending lawsuit that claims that a document entitled "Puerto Rican Interview Guide" was used in the course of investigations involving suspicion of fraud related to Puerto Rican birth certificates or driver's licenses. This document originated from the State Department's Diplomatic Security Service but may have been shared with you with a DDS logo affixed to it.

You have previously been directed to discontinue use of this document. However, it is my intention to remind you and make it clear that this document or any other version of this document should not be used in any investigation, or training – formal or informal. This document is not a document approved by this administration, and it is my understanding that it was not approved by any prior commissioners. Any use of this document, any version, is considered a violation of DDS policy and could result in an investigation and/or discipline.

Sincerely,

Spencer R. Moore
Commissioner

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