

1           A.    I believe that's correct.  And I believe I  
2   saw figures on the Internet maybe five years ago,  
3   like, starting at 40 and going up to 80, depending on  
4   where you were, if you're in a very rural area or a  
5   large hospital --

6           Q.    Small animals?

7           A.    I don't know the difference -- actually, I  
8   think there are some doctors who work with horses who  
9   make a lot more.  But I'm no expert, I don't know.

10          Q.    Do you recognize that document?

11                I guess there are two on there, two  
12   different photographs.

13          A.    Yes.

14          Q.    What is the first one?

15          A.    This is my passport, my American passport.

16          Q.    And that's issued by the United States?

17          A.    Yes.

18          Q.    And what is the document below it?

19          A.    This is my official Dominican residence.

20          Q.    It's a resident card?

21                **A.    Resident card.  I'm a legal Dominican**  
**22   resident.**

23          Q.    And do these both state your name?

24          A.    Yes.

1 Q. What is the name that's on them?

2 A. Sandra Clarissa Zemialkowski, and Sandra  
3 Clarissa Zemialkowski Rivera.

4 Q. May I ask why one has a different name than  
5 the other?

6 A. Because in Latin American we always use  
7 both last names. Only here we just use the paternal  
8 last name.

9 Q. So Rivera is your mother?

10 A. Is my mother's last name. We -- in fact,  
11 most people down there use their mother's last name,  
12 like, always.

13 Q. So you're a U.S. citizen?

14 A. I'm a U.S. citizen.

15 Q. And that's because you were born in Puerto  
16 Rico?

17 A. I was born in an Air Force base in Puerto  
18 Rico.

19 Q. And your mother is a U.S. citizen?

20 A. She's Dominican. She's a U.S. citizen.  
21 She was a naturalized citizen.

22 Q. So she has dual citizenship?

23 A. Yes, she has dual citizenship.

24 Q. And your father, is he a U.S. citizen?

1 A. Yes.

2 Q. He was born in the United States?

3 A. Yes.

4 Q. Is he a Dominican citizen as well?

5 A. No, he's a Dominican resident as well.

6 Q. And you're a Dominican resident?

7 A. I'm a Dominican resident.

8 Q. And have you applied for residency for your  
9 daughter, Kali?

10 A. I started to, but it's still in process.  
11 It takes some time.

12 MS. BERRIEN: Can you mark that?

13 (Exhibit 8, marked)

14 Q. (By Ms. Berrien) What does one need an ID  
15 card for in the Dominican Republic? Why do you have  
16 an ID card?

17 A. Are you referring to the resident card?

18 Q. Yes, the normal ID card, I'm sorry, is that  
19 called --

20 A. It's called a cedula, C-E-D-U-L-A.

21 Q. Does everybody have one?

22 A. Yes, everybody is supposed to have one.

23 This is -- it's pretty much similar to the Social  
24 Security number, it's just the way that you can open

1 up bank accounts and just go about business, it's  
2 like an ID number.

3 Q. What if you're not a Dominican citizen; you  
4 still get one of those, right?

5 A. Yes, you do, but you can only receive that  
6 after you get your official residence.

7 Q. So if someone's in the country and they're  
8 not an official resident, they would not have one of  
9 those cards?

10 A. No, you need to get that stuff first and  
11 then you can get your cedula.

12 Q. So, you moved to Massachusetts, you said,  
13 June 27, 2007?

14 A. Yes.

15 Q. And why did you move to Massachusetts?

16 A. I was seven months pregnant at the time,  
17 and since both Dhanika and I, we didn't have  
18 relatives or family in Florida, we were trying to  
19 think about solutions for child care. At that point  
20 I didn't consider what I had -- what possibilities I  
21 had on my side. We considered what possibilities he  
22 had available in Massachusetts because his mother  
23 lives here in the house that they have together.

24 Q. So he has a house in Massachusetts; that