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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

FEB 6 2008
SOLICITOR GENERAL'S OFFICE

MARIA M. GONZALEZ, et al.,)	
)	CV06-1268-PHX-ROS (LEAD)
)	
Plaintiffs,)	
)	CV06-1362-PCT-ROS
VS.)	
)	
STATE OF ARIZONA, et al.,)	CV06-1575-PHX-ROS
)	
)	
Defendants,)	
_____)	

YUMA, ARIZONA

JANUARY 17, 2008

1:00 P.M.

DEPOSITION OF GEORGIA MORRISON FLORES

PREPARED FOR:

MS. BARBARA A. BAILEY, ESQ.
OFFICE OF THE ATTORNEY GENERAL
1275 W WASHINGTON
PHOENIX, ARIZONA 85007

BORT COURT REPORTING SERVICE

REGISTERED PROFESSIONAL REPORTERS
220 SOUTH SECOND AVENUE
YUMA, ARIZONA 85364
PHONE: (928) 782-7591

BY: PAMELA E. BANAS'-COOK, RPR
AZ CR NO. 50259

1 that she's gone I gotta go and find a job to take
2 care of all that.

3 Q. Okay. Do you presently have a bank
4 account?

5 A. Yes.

6 Q. Okay. And who is that with?

7 A. SunBank.

8 Q. SunBank?

9 A. Um-hum.

10 Q. And is your name on the account?

11 A. Yes, ma'am.

12 Q. Okay. And do you receive any statements
13 from that bank?

14 A. Yes.

15 Q. Okay. And what address do you receive
16 those statements at?

17 A. 510 South 17th Avenue.

18 Q. Okay. Do you receive monthly statements
19 from them?

20 A. I got one statement only from them since
21 I've opened it.

22 Q. How long have you had that account?

23 A. Um -- since December.

24 Q. December of 2007?

25 A. 2007, um-hum.

1 Q. Okay. Do you expect that you will receive
2 monthly statements from that bank?

3 MR. URIAS: Objection, form.

4 THE WITNESS: Yes.

5 Q. (BY MS. BAILEY) Do you own a computer?

6 A. Yes.

7 Q. And do you have internet service on that
8 computer?

9 A. Not at the present.

10 Q. No? Okay. Do you expect to obtain
11 internet service at any point in the near future?

12 MR. URIAS: Objection, form.

13 THE WITNESS: Sometime.

14 Q. (BY MS. BAILEY) Sometime?

15 A. Yes.

16 Q. Okay. Do you have a car or a vehicle,
17 motor vehicle?

18 A. Yes.

19 Q. Is your car registered with Arizona Motor
20 Vehicle Division?

21 A. Yes.

22 Q. And do you have insurance on your car?

23 A. No.

24 Q. No insurance? Okay.

25 (Mr. Bernal enters.)

1 the organization?

2 A. I don't recall it. Yes, ma'am.

3 Q. Okay. And did you receive a voter
4 registration card when you registered to vote?

5 A. Yes, ma'am.

6 Q. At that time when you registered you were
7 using the name Georgia Morrison-Flores?

8 A. Yes, ma'am.

9 Q. Okay. And is that the name that you
10 registered under?

11 A. Yes, ma'am.

12 Q. Okay. I'm going to get an exhibit out
13 here.

14 MS. BAILEY: If you want to mark this
15 as our first exhibit.

16 (Exhibit 1 marked for identification.)

17 Q. (BY MS. BAILEY) Okay. I'm handing you
18 what the Court Reporter has marked as Exhibit 1.

19 (Tenders.)

20 A. (Complies.)

21 Q. And, if you would just take a moment to
22 look over that, and I'm going to ask you a few
23 questions about it.

24 A. Okay. (Complies.)

25 Q. And let me represent to you that these

1 three pages are pages that Yuma County produced in
2 response to a request by your counsel.

3 A. Um-hum.

4 Q. And I just stapled these three pages
5 together because I wanted to ask you just a few
6 questions about them.

7 A. Um-hum.

8 Q. I don't expect actually that you would
9 recognize all of them. But I wanted to ask you if
10 you would to turn to the second page.

11 A. (Complies.)

12 Q. And ask you if you recognize this document?

13 A. Yes, ma'am.

14 Q. Can you tell me what this is?

15 A. This is the -- it was -- it was a form that
16 the lady gave us to fill out. It was a blue, red
17 form.

18 Q. Voter registration form?

19 A. Um-hum. Yes.

20 Q. And is this filled out by you?

21 A. Yes, ma'am.

22 Q. Okay. And just, again, for the record's
23 sake, it states the name Georgia -- it says Flores
24 dash Morrison, middle name Ann. Do you see that?

25 A. Um-hum.

1 Q. And then it gives a street address of 510
2 South 17th Avenue?

3 A. Um-hum.

4 Q. And a PO Box 1349?

5 A. Um-hum.

6 Q. In Yuma, 85366? Do you see that?

7 A. Um-hum.

8 Q. And that is your current address, the 510
9 South 17th Avenue?

10 A. Yes.

11 Q. Okay. And is that your signature at the
12 bottom of the form?

13 A. Yes.

14 Q. Georgia A. Morrison-Flores?

15 A. Yes.

16 Q. And did you sign and date that on September
17 3rd, 2004?

18 A. Yes.

19 Q. Okay. I noticed at the bottom of the form,
20 it's hard to read, but the very -- almost the very
21 last line it says, will you be willing to work at a
22 polling place on Election Day. And the yes box is
23 checked?

24 A. Um-hum.

25 Q. Did you check that box?

1 Q. I see. Okay. And -- okay, I've already
2 asked that question.

3 Do you have a voter registration card?

4 A. Yes.

5 Q. Do you have that with you today?

6 A. I -- no.

7 Q. Okay.

8 A. I couldn't find it.

9 Q. Couldn't find it. Can you tell me what
10 name is on the voter registration card that you have,
11 the most recent voter registration card?

12 A. Georgia Morrison-Flores. Georgia A.
13 Morrison-Flores.

14 Q. Okay. That's consistent with the page two
15 of Exhibit 1, would you agree?

16 A. Georgia. Yes, ma'am.

17 Q. Okay.

18 Okay. Would you please tell me what
19 happened --

20 (Counsel confer off the record.)

21 Q. (BY MS. BAILEY) Actually, on -- if you
22 would look at page two of your exhibit.

23 A. (Complies.)

24 Q. In the box towards the top left it says
25 last name, and you had written there,

1 Q. Okay. But you go by Morrison-Flores?

2 A. Georgia A. -- yeah, Morrison-Flores.

3 Q. Okay.

4 A. Morrison is my maiden name. Flores is my
5 married name.

6 Q. Okay.

7 A. I don't think I would go by --

8 Q. Okay. Right.

9 A. Yeah. Okay. Thank you.

10 Q. All right. Okay.

11 I wanted to ask you about your
12 experience when you went to vote in November of 2006.

13 A. Um-hum.

14 Q. First of all, you went to vote in person on
15 Election Day in November of 2006; is that correct?

16 A. Yes.

17 Q. Okay. And where did you go to vote?

18 A. The Martin Luther King Center down on 3rd.

19 Q. Okay. And that is your polling place;
20 correct?

21 A. Yes.

22 Q. Okay. And would you just describe for me
23 what happened when you went in to vote that day?

24 A. Well, I took my mother to go vote. And I
25 was going to do my vote. And we went up to the

1 table. And there were these four black ladies that
2 were sitting there. Knew every one of them. In
3 fact, one of them was my neighbor. So she knew me.
4 And I had my mother's ID, for my mother. And then
5 they wanted mine. And gave them mine. And they
6 said, this is wrong. My name on my driver's license
7 was not the name on their list. So I couldn't vote
8 for that little error on there.

9 Q. Okay. What -- did they show you the name
10 that they had on the list?

11 A. Yes.

12 Q. What was that name?

13 A. Flores.

14 Q. So --

15 A. Georgia A. Morrison-Flores.

16 Q. Okay. And what was the name that you had
17 on your license that you showed to them?

18 A. Georgia Morrison-Vasquez.

19 Q. Okay. Were you talking with one poll
20 worker?

21 A. Actually, they all four were talking to me.

22 Q. Okay. So they were kind of all together
23 and you were --

24 A. Yeah, they all knew me. And so they were
25 kind of all talking to me.

1 Q. How had you heard that you were going to
2 need identification, do you recall?

3 A. No.

4 Q. After you left the polling place did you
5 ever contact anyone to complain about not being able
6 to vote?

7 A. No.

8 Q. Okay. Was that the first time you had
9 attempted to vote since you became a registered
10 voter?

11 A. Yes.

12 Q. Okay. And, just so I'm complete, is there
13 anything else that was said at the polling place
14 either by you or the poll workers, other than what
15 you've told me?

16 A. Regarding?

17 Q. Regarding your attempt to vote --

18 A. No.

19 Q. -- on Election Day in 2006?

20 A. No.

21 Q. Okay. At some point did you go to -- well,
22 I think that you testified that you did at some point
23 go to the Motor Vehicle Division and update your name
24 with the MVD. Is that correct?

25 A. I had to go first to Social Security.

1 Q. Okay.

2 A. And correct it there. And then go to Motor
3 Vehicle.

4 Q. Okay. And that was in April of 2007?

5 A. Yes, ma'am.

6 Q. Okay. And did you have a new photograph
7 taken at that time?

8 A. Yes.

9 Q. For your driver's license?

10 A. Yes.

11 Q. Okay. And at that time when you went in to
12 update your information with the MVD did you have to
13 fill out some kind of form to get a new license?

14 A. Yes, their application form I had to fill
15 out.

16 Q. Okay. And on that form did you indicate
17 the reason that you were seeking a new license was a
18 name change --

19 A. That's right.

20 Q. -- due to marriage?

21 A. Yes.

22 Q. And at that time did you provide to the MVD
23 your married name of Georgia Ann Morrison-Flores?

24 A. Yes.

25 Q. Have you had any Arizona driver's licenses

1 A. Actually, when you're a permanent employee,
2 they put indefinite on it.

3 Q. Okay.

4 A. So, I don't know what they do nowadays, but
5 back then that's what they used to do.

6 Q. Okay. Does that ID have your address on
7 it?

8 A. I'm not sure. It has my picture. And my
9 height and weight. I'm not sure.

10 Q. Okay. And you mentioned that you could not
11 find your voter registration card to bring today; is
12 that correct?

13 A. Yes, ma'am.

14 Q. Okay. But you do recall receiving a voter
15 registration card?

16 A. Yes, ma'am.

17 Q. All right. Do you intend to -- to vote
18 in -- in the general election this year?

19 A. Yes.

20 Q. Okay. And will you -- do you intend to
21 vote in person at that election?

22 A. Yes.

23 Q. Okay. What do you intend to use for
24 identification to vote in person at the general
25 election in 2008?

1 A. The driver's license.

2 Q. Okay. That's the driver's license you
3 brought here with you today?

4 A. Yes.

5 Q. Okay. Do you intend to vote in the primary
6 in 2008?

7 A. Yes.

8 Q. Okay. And are you going to use your
9 driver's license to vote then?

10 A. Yes.

11 Q. All right. Are you aware that voters in
12 Arizona can vote early?

13 A. Yes.

14 Q. Okay. Have you ever attempted to vote
15 early at any election?

16 A. I've done it for my mother.

17 Q. For your mother?

18 A. Yes.

19 Q. What did you do to help your mother vote
20 early?

21 A. They sent her an early voters in the mail.
22 And we filled it out and sent it back in.

23 Q. Okay. Have you ever considered doing that
24 for yourself?

25 A. No, ma'am.

1 A. Yes. No. No.

2 Q. How about ACORN? They go by ACORN
3 sometimes. Are you familiar with that organization?

4 A. An organization called ACORN?

5 Q. Um-hum.

6 A. Acorn Casino?

7 Q. I doubt if it's the same organization.

8 A. Oh. No. No. I'm sorry. No.

9 Q. Okay. That's fine.

10 MS. BAILEY: I'd like to take just a
11 few minute break, if that's okay?

12 MR. URIAS: Sure.

13 MS. BAILEY: All right.

14 (There was a short break taken at
15 2:30 p.m. until 2:44 p.m.)

16 (Exhibit 3 marked for identification.)

17 MS. BAILEY: Okay. I think we can go
18 back on the record, when you're ready.

19 Q. (BY MS. BAILEY) Ms. Morrison-Flores, I'm
20 handing you what has been marked as Exhibit 3.

21 (Tenders.)

22 A. (Complies.)

23 Q. And I just wanted to ask you if that is a
24 true and correct copy of your current Arizona
25 driver's license.

1 A. Yes, it is.

2 Q. Okay. Thank you.

3 A. Um-hum.

4 MS. BAILEY: At this time I don't have
5 any further questions for you. And I understand
6 Ms. Rapp has some questions for you.

7 THE WITNESS: Thank you.

8 MS. BAILEY: So I'll turn it over to
9 you.

10 EXAMINATION

11 BY MS. RAPP:

12 Q. And I really truly only have a few, so
13 we'll be brief here. Much earlier Ms. Bailey asked
14 you if you lived in Arizona your whole life. Do you
15 remember when she asked you that?

16 A. Um-hum.

17 Q. And you said yes; is that correct?

18 A. Yes.

19 Q. And I think a little bit later on you
20 remembered that you were at Camp Pendleton for
21 awhile. Is that correct?

22 A. Camp Pendleton, and Sierra Vista.

23 Q. Oh, in Sierra Vista? Okay.

24 A. Um-hum.

25 Q. I was under the impression that Camp

Tab 20



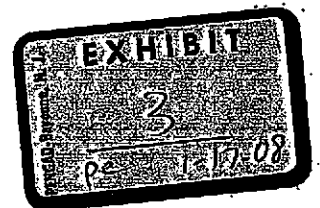
Redacted:
DL number & DOB



Number
Expires 08/08/2018
Date of Birth 04/05/2007



Class: D Operator
Restrictions: NONE
Restrictions: A Corrective Lenses



Tab 21

Action I Add, Chg, Del

Voter Number 129317

Confidential

Name-Last FLORES-MORRISON

First GEORGIA

Middle ANN

Res Ads 510 S 17TH AVE

Res City YUMA

Res Zip 85364 - 0000 Telephone 928 - 782 - 0819

Mail Adr P O BOX 1349

Mail City YUMA

Mail State AZ

Mail Zip 85366 - 0000

Date of Birth

Sex F

Birth State/Country AZ

SSN

Parent's Name MORRISON

Occupation Code: 86

Precinct 2

Party D

Reg Date 20040903

Date of Change

ELECTION PRIM GEN

2006

2004

Cong Dist 7

Legs Dist 24

High Dist 70

Elem Dist 1

Supv Dist 1

J\P Dist 1

J\C Dist 4

City Dist 1

Fire Dist

Misc Dist

Pest Dist

Notice

F3 - Return Selector

Registration Code: I

F5 - More Information

F6 - Alt. Address

Registration Form# 50022975

F7 - Return Main Menu

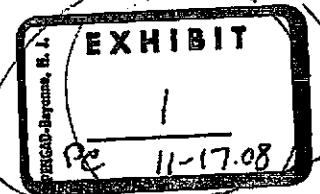
Print Registration Card?

Print Absentee Ballot?

Redacted:
DOB & Last 4 of SSN

NO Voting
History

* This is from old County
Computer System



VRA2 New Voter # 1500126309

Are you a citizen of the United States of America? Yes No
Will you be 18 years of age on or before election day? Yes No
If you checked "No" to either of these questions, do not complete this form.

22975 129317 ^{AK}

Last Name: FLORES-MORRISON First Name: GEORGIA Middle Name: ANN

Address where you live (home number, street and street number; do not use address described below): 510 S. 17th Ave P.O. Box 1349
Do not use post office box or business address unless a sign below is located in front area (provide apt. or suite no. if applicable)

City: YUMA State: ARIZONA Zip: 85366 Address where you are employed (if not at home): P.O. BOX 1349

Specify Party Preference: ? Occupation: SELF-EMPLOYED Driver's license no. (See race registration requirements above): MORRISON

Are you registered to vote at another address? Yes No (Not Sure) your name can differ from that on file with registration if former name

- Vote Declaration - By signing below, I swear or affirm that the following is true:
- I am a CITIZEN of the United States
 - I am a RESIDENT of Arizona and the above stated county
 - I will be at least 18 YEARS OF AGE by the next general election
 - I am NOT a convicted (FEDERAL or any other) crime are restored
 - I have NOT been adjudicated INCOMPETENT (A.R.A. § 4-5103)
 - I am not presently a state registered sex offender

SEP 13 2004

SIGN HERE: Georgia A. Morrison-Flores DATE: 9-3-2004

If you see this on the form, the form can be completed if your signature is present. The person who checked you must sign here: _____ Date: _____

Will you be willing to work at a polling place on election day? Yes No

Remove tape and fold to fit

If no street address check () box here:

Check only the box

Inactive

Precinct

Center

Redacted:
DOB & Last 4 of SSN



Registrant ID: 9500126389 Secure Signature Permanent Absentee

Name: Title: Last: FLORES-MORRISON First: GEORGIA Middle: ANN Suffix:

Address: Standard Non-Standard
Street No: 510 St: Dir Prefix: S Street: 17TH Type: AVE Dir Suffix:
Unit Type: Unit No: City: YUMA State: AZ Zip: 85364 CR:
Precinct Part: 002.01 Email:

Registrant Data: SSN: DL or ID#: Date of Birth: 54 yrs. Gender: FEMALE Party: PARTY NOT DEL. How Reg: ID Required:
Federal Data: Reg Date: 9/3/2004 Status: A Reason: VALID REGISTRATION Source: OTHER Assistance: Citizenship Verified?

Precinct: Additional: Addresses: Previous: Assistant: **Voting History** Activity: Attachments: Notes

Election Date Political Party Precinct Part Voted Where How Voted: ABS Reason

Table with columns: Election, Date, Political Party, Precinct Part, Voted Where, How Voted: ABS Reason. The table is mostly empty with a large handwritten note: "No Voting History" and a redacted area: "Redacted: DOB & Last 4 of SSN".

* Printed from New "Power Profile" Statewide Program