

# Exhibit 2

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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

1	MARIA M. GONZALEZ, et al.,	)	
2		)	
3		)	
4		)	
5	Plaintiffs,	)	
6		)	CV06-1268-PHX-ROS(LEAD)
7	vs.	)	CV06-1362-PCT-ROS
8		)	CV06-1575-PHX-ROS
9	STATE OF ARIZONA, et al.,	)	
10		)	
11	Defendants.	)	
12	<hr/>		

DEPOSITION OF GEORGIA MORRISON FLORES

Taken on Thursday, January 17, 2008

at 256 S 2nd Avenue, suite E  
Yuma, Arizona

At 1:00 p.m.

Reported by: Pamela E. Banas'-Cook, RPR, CCR, CR  
AZ CR No. 50259

0002

Appearances:

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2		David Urias, Esq.
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0003

I N D E X

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EXHIBITS

NUMBER		MARKED
1	Yuma County Forms - 3 Pages	35
2	Arizona Motor Vehicle Division Forms - 12 Pages	51
3	Photocopy of Arizona Driver's License - 1 Page	70

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0004

DEPOSITION OF GEORGIA MORRISON FLORES

The deposition of Georgia Morrison Flores was taken pursuant to Notice before Pamela E. Banas'-Cook, RPR, New Hampshire CCR, Arizona CR, on the 17th day of January, 2008, commencing at 1:00 p.m. at 256 S 2nd Avenue, Suite E, Yuma, Arizona.

The following proceedings were had:

GEORGIA MORRISON FLORES, was called as a witness by the Defense, and having been first duly sworn by the Court Reporter, was examined, and testified as follows:  
(Mr. Bernal not present at this time.)

EXAMINATION

BY MS. BAILEY:

- Q. Good afternoon, Ms. Morrison-Flores.
- A. Good afternoon.
- Q. Is that how you would like to be addressed at the deposition, Ms. Morrison-Flores? Is that the name you go by?
- A. Yes, that's fine. Thank you.
- Q. Okay. Thank you for being here today.
- A. You're welcome.

0005

1 Q. I appreciate your time. Have you ever had  
2 your deposition taken before?

3 A. No.

4 Q. Okay. I'll just explain a little bit of  
5 the process. And I understand your lawyers may have  
6 already talked to you about that. But basically I  
7 will just be asking you questions. Ms. Rapp may ask  
8 some questions, as well, later in the deposition.  
9 And you will answer the questions. And the Court  
10 Reporter will take down what is said --

11 A. Okay.

12 Q. -- while we're on the record.

13 Because she's typing down what we say,  
14 it helps if we are not speaking over each other. So,  
15 if you would wait until I ask the question, and then  
16 I will do my best to wait for you to answer the  
17 question, and then we can -- we can go on question by  
18 question then.

19 A. Okay.

20 Q. And, if you want to take a break at any  
21 time, just let me know. If there's a question that  
22 is pending, I would ask that you answer the question,  
23 and then we could take a break.

24 I actually don't expect that this will  
25 be a terribly long deposition. So --

0006

1 A. Okay.

2 Q. The other thing I was going to mention to  
3 you is that if at any point during the deposition if  
4 you think of some information that -- that hadn't  
5 come to you in response to a previous question, and  
6 you want to go back and clarify a previous answer, or  
7 add to that, just let me know at that time, and we  
8 will -- we will do that.

9 A. Okay. Thank you.

10 Q. Is there any reason why you cannot answer  
11 my questions fully and completely today?

12 A. No.

13 Q. Okay. All right. Great.

14 Ms. Morrison-Flores, what is your  
15 understanding of the issues that are raised in this  
16 lawsuit?

17 MR. URIAS: Objection, form.

18 THE WITNESS: Basically not being able  
19 to vote when I was -- when I went to vote.

20 Q. (BY MS. BAILEY) Okay.

21 A. I wasn't allowed to vote.

22 Q. Okay. And is it your understanding that  
23 one of the voting requirements that is being  
24 challenged in this lawsuit then is the requirement of  
25 a voter to show identification at the polls in order

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1 to vote on Election Day?

2 A. Yes.

3 Q. If you wouldn't mind, just speak up just a  
4 little bit for the Court Reporter, that would be  
5 great.

6 A. Okay.

7 Q. And is it also your understanding in this  
8 lawsuit that the voting -- one of the voting  
9 requirements being challenged in this lawsuit is the  
10 requirement that a person wishing to register to vote  
11 provide proof of citizenship in order to register to

12 vote?  
13 A. Yes.  
14 Q. Okay. And, in terms of your participation  
15 in this lawsuit -- well, let me strike that.  
16 Do you have -- is it your  
17 understanding that there are any other voting  
18 requirements being challenged in this case?  
19 MR. URIAS: Objection, form.  
20 THE WITNESS: I'm sorry, I don't  
21 understand.  
22 Q. (BY MS. BAILEY) Well, I asked you if it  
23 was your understanding that this lawsuit is  
24 challenging the identification at the polls  
25 requirement.

0008

1 A. Yes.  
2 Q. Right?  
3 A. (Nods head up and down.)  
4 Q. And then I asked you if the lawsuit, it's  
5 your understanding that in this lawsuit the proof of  
6 citizenship in order to register to vote requirement  
7 is being challenged.  
8 A. Yes.  
9 Q. And that's your understanding?  
10 A. (Nods head up and down.)  
11 Q. And what I just wanted to ask is are you  
12 aware of any other challenges being brought in this  
13 lawsuit?  
14 A. No.  
15 Q. Okay. And, as far as your participation in  
16 this lawsuit, are you challenging the voting  
17 requirement of providing identification at the polls  
18 in order to vote on Election Day?  
19 A. Yes.  
20 Q. Okay. And is it correct that you are not  
21 challenging the requirement that one shows proof of  
22 citizenship in order to register to vote?  
23 A. Yes.  
24 Q. That's correct?  
25 A. Well, my understanding, that you don't need

0009

1 to provide, yes.  
2 Q. Okay.  
3 A. I'm sorry.  
4 Q. Yes, let me clarify that.  
5 A. Thank you.  
6 Q. And I actually should have mentioned  
7 previously, if -- if you don't understand my  
8 question, sometimes I'm not very good at asking the  
9 question, please just let me know.  
10 A. Thank you.  
11 Q. And I will try to clarify that. Because I  
12 want to get your best testimony today.  
13 A. Thank you.  
14 Q. Is it -- as far as your participation in  
15 this lawsuit goes, are you challenging the voting  
16 requirement of proof of citizenship in order to  
17 register to vote?  
18 MR. URIAS: Objection, form.  
19 THE WITNESS: Provide proof of  
20 citizenship?  
21 Q. (BY MS. BAILEY) Yes.  
22 MR. URIAS: If you don't understand

23 the question, you can just tell her that.  
24 Q. (BY MS. BAILEY) Yes.  
25 A. I'm sorry.  
0010  
1 Q. That's all right. We'll just move on from  
2 there. How did you first hear about this lawsuit?  
3 A. I was approached by -- oh, gee. Who was --  
4 I met a lady at -- when I took my mother to vote, and  
5 I met a lady. Oh, I forgot her name.  
6 MR. URIAS: If you can't recall what  
7 her name was, that's --  
8 THE WITNESS: Maria? Hm. I met a  
9 lady. I met a lady at the time, when I went to try  
10 to vote. I took my mother, and I met this lady from  
11 their office. (Indicating.) And she informed me  
12 when I was coming out, did I get to vote? And I  
13 said, no. And she said, why? And I said, because  
14 they had my name mixed up, they had my name wrong, so  
15 I didn't get to vote. And that's how it all started.  
16 But I can't remember her name.  
17 Q. (BY MS. BAILEY) Okay.  
18 A. Anyway...  
19 Q. Was that back in November of 2006?  
20 A. Yes, ma'am.  
21 Q. Okay. And so can you tell me about that  
22 conversation -- well, first of all, I should ask,  
23 was -- was that a lawyer that you're referring to?  
24 A. Yes.  
25 Q. Okay. So it was a lawyer that you talked  
0011  
1 to at that time?  
2 A. Um-hum.  
3 Q. Okay. And is that your current lawyer in  
4 this lawsuit?  
5 A. Hm. No. No.  
6 Q. Okay. And how did you come to be a  
7 Plaintiff in this lawsuit?  
8 A. They called me and they asked me about  
9 my -- what had took place. And I told them. And  
10 basically this was that I wasn't able to vote, even  
11 though I had my -- my ID. But because one name was  
12 on their record, and my ID was another name, I -- I  
13 wasn't able to vote.  
14 Q. Okay. Okay. Thank you.  
15 A. You're welcome.  
16 Q. And I don't want to actually get into any  
17 communications that you had with any of your lawyers.  
18 So, if I ask a question, you know, that gets into  
19 those communications, you just let me know. Okay?  
20 A. Thank you.  
21 Q. Okay.  
22 Are you paying for legal services in  
23 this case?  
24 A. No.  
25 Q. Okay. I think I know the answer to this  
0012  
1 question from the complaint. But just for the  
2 record, what is your ethnicity?  
3 A. I'm black.  
4 Q. Okay. Where were you born?  
5 A. Yuma, Arizona.  
6 Q. Okay. A native?  
7 A. Yes.

8 Q. where were your parents born?  
9 A. My dad and mom were born in Hope, Arkansas.  
10 Q. Okay. That's Bill Clinton's hometown?  
11 A. Yes.  
12 Q. Okay. And so have you lived in Arizona all  
13 your life?  
14 A. Yes, I have.  
15 Q. Okay. And always here in Yuma County?  
16 A. Yes.  
17 Q. Okay. And I take it is English your native  
18 language?  
19 A. Yes.  
20 Q. Okay. Are you married?  
21 A. Yes.  
22 Q. And when did you marry your husband?  
23 A. July the 5th, 2003.  
24 Q. And did you get married here in Yuma  
25 County?  
0013  
1 A. Yes.  
2 Q. And what is your husband's name?  
3 A. Casimiro Flores. C-a-s-i-m-i-r-o Flores.  
4 Q. And did you obtain a marriage license from  
5 here in Yuma County?  
6 A. Yes.  
7 Q. And what did you do to get that marriage  
8 license?  
9 A. what did I do?  
10 Q. Yes, what did you have to do to get the  
11 marriage license?  
12 A. Go up to the courthouse, pay for it, and  
13 take it to our minister, and then get married.  
14 Q. Okay.  
15 A. Yes.  
16 Q. Okay. Do you remember what the fee was to  
17 get that marriage license?  
18 A. I think it was fifty dollars, but I don't  
19 remember exactly. But I think it was fifty dollars.  
20 Q. Okay. And did you have to provide any  
21 identification in order to get the marriage license?  
22 A. I don't remember. I don't remember.  
23 Q. Okay. What is the name that you go by  
24 today?  
25 A. Georgia A. Morrison-Flores.  
0014  
1 Q. What was the name that you went by before  
2 you married your husband?  
3 A. Georgia A. Morrison-Vasquez.  
4 Q. Okay.  
5 Does your husband work?  
6 A. Not at the present, no.  
7 Q. Okay. Has he ever been employed since  
8 you've been married?  
9 A. Yes.  
10 Q. Okay. And what did he do --  
11 A. His --  
12 Q. -- for employment?  
13 A. His last job he was an oil technician at  
14 the Valvoline Oil Change Center on 24th.  
15 Q. And what -- can you tell me what time  
16 period he worked there during your marriage?  
17 A. Um -- oh, golly, I'm sorry, I don't  
18 remember.

19 Q. If you only know an approximate time  
20 period, that would be helpful.  
21 A. Oh, gee. Probably from 2004 to 2006.  
22 Q. And do you know what his income was for  
23 that work, either monthly or -- or annual?  
24 A. Monthly, he was getting like -- it was like  
25 525 every two weeks.

0015  
1 Q. And he has not been employed since he left  
2 that position in 2006?  
3 A. No, ma'am, he hasn't.  
4 Q. Okay. Does your husband receive any other  
5 income apart from that income that he earned while an  
6 oil technician?  
7 A. No.  
8 Q. Okay. And what is his level of education,  
9 highest level of education obtained?  
10 A. High school.  
11 Q. High school?  
12 A. Um-hum.  
13 Q. Okay. And is he a native English speaker?  
14 A. Yes, ma'am.  
15 Q. All right.  
16 A. He was born in San Diego.  
17 Q. Okay. Do you have any children?  
18 A. No.  
19 Q. No children?  
20 A. No children.  
21 Q. And do you live with your husband  
22 currently?  
23 A. Not at the present.  
24 Q. Not at present? Okay. Do you live with  
25 anyone other -- do you live with anyone, I should  
0016 say?  
1 A. At the present, no.  
2 Q. At the present? Okay.  
3 And what is your current address?  
4 A. 510 South 17th Avenue.  
5 Q. And that's here in Yuma?  
6 A. Yuma, yes.  
7 Q. 85364?  
8 A. Yes, ma'am.  
9 Q. I took that actually from one of your I  
10 think responses on the Interrogatories.  
11 A. (Nods head up and down.)  
12 Q. So... And how long have you been at that  
13 address?  
14 A. Actually, that's where I was raised at.  
15 Q. Oh, okay.  
16 A. Yeah.  
17 Q. So when did you begin living there?  
18 A. Hm. 19 -- about 1956.  
19 Q. Okay. Now, have you lived at that address  
20 since 1956?  
21 A. No, no.  
22 Q. Okay. How long has it been since you most  
23 recently moved to that address?  
24 A. Me and my husband separated in July, 2005.

0017  
1 Q. Okay.  
2 A. And that's when I moved back home with my  
3 mother and started taking care of my mother.

4 Q. Okay. So you do live with your mother,  
5 then?  
6 A. Just recently she died last -- she died in  
7 November.  
8 Q. Oh, I'm sorry.  
9 A. Thank you.  
10 Q. I'm sorry.  
11 Okay. And are you able to receive  
12 mail at that address?  
13 A. Yes.  
14 Q. Okay. Do you receive mail at that address?  
15 A. Yes.  
16 Q. Okay. What kind of mail do you receive at  
17 that address? And I can give you some examples. For  
18 example, you know, bills, just junk mail? I'm going  
19 to ask you about election mail, personal mail. But  
20 I'll just ask you generally, what mail do you receive  
21 at that address?  
22 A. All of the above.  
23 Q. Okay.  
24 A. Utility bills, personal letters, tax bills.  
25 Q. Okay. And do you also have a post office  
0018 box?  
1 A. No, no longer have it.  
2 Q. Oh, you don't?  
3 A. No.  
4 Q. Okay. I understand at some point from your  
5 discovery responses you did have a post office box;  
6 correct?  
7 A. Yes, ma'am.  
8 Q. Okay. When did -- do you recall what that  
9 post office box address was?  
10 A. 1349. PO Box 1349.  
11 Q. Here in Yuma?  
12 A. Yes, ma'am. 85364 -- I'm sorry, 85366.  
13 Q. Okay. And for what period did you have  
14 that post office box address?  
15 A. Oh. Since about 1970 to about 2007.  
16 Q. Okay.  
17 A. I -- I canceled it when my mother died.  
18 Q. Okay. In November of 2007?  
19 A. Yes, ma'am.  
20 Q. Okay. Can you tell me what the fee was for  
21 that PO box?  
22 A. Oh. It varies. In fact, I think even for  
23 December I think it went up. Like 36, 39 dollars for  
24 every six months.  
25  
0019  
1 Q. Okay. And so do you receive mail at any  
2 address other than 510 South 17th Avenue in Yuma?  
3 A. No.  
4 Q. Okay. Do you presently own a home?  
5 A. Well, I'm thinking 510 South 17th Avenue is  
6 my home.  
7 Q. Okay.  
8 A. But after all the legal things are taken  
9 care of with it.  
10 Q. I see. That was your mother's home?  
11 A. My mom and my dad.  
12 Q. Okay. So you don't presently pay taxes on  
13 that home; is that correct?  
14 A. Yes.

15 Q. Okay. Do you own any other real property?

16 A. No.

17 Q. Okay. You mentioned that you receive  
18 utility bills, sometimes, at your present address?

19 A. Um-hum.

20 Q. Could I ask you if you would to tell me  
21 which utility bills you receive at -- at that  
22 address?

23 A. Arizona Public Service for electric.  
24 Southwest Gas for the gas. City of Yuma for the  
25 water. Qwest for the phone bill.

0020

1 Q. Okay. And are each of those utilities  
2 presently in your name?

3 A. No, they were in my mother's name.

4 Q. Your mother's name. And what is her name?

5 A. Bobbie Morrison. B-o-b-b-i-e.

6 Q. Okay. Do you presently have any utilities,  
7 services that are in your name?

8 A. No, I do not.

9 Q. Okay. And do you have a -- a cell phone?

10 A. Yes.

11 Q. And who is that with? Which carrier?

12 A. Virgin Mobile.

13 Q. Okay. And is that cell phone account in  
14 your name?

15 A. Yes.

16 Q. Okay. And do you receive invoices for that  
17 account at your present address?

18 A. No.

19 Q. No?

20 A. No.

21 Q. Do you receive any invoices --

22 A. No.

23 Q. -- for that service?

24 A. No.

25 Q. No?

0021

1 A. This is one of those prepaid.

2 Q. Okay.

3 A. Yeah.

4 Q. You pay as you go?

5 A. Yeah.

6 Q. Okay. Do you receive any mail from Virgin  
7 whatsoever?

8 A. No, ma'am, I don't.

9 Q. Okay. Do you have cable or satellite  
10 television?

11 A. No, ma'am.

12 Q. Okay.

13 MR. URIAS: I'm sorry, would you like  
14 some water?

15 THE WITNESS: No, I'm fine, thank you.

16 Q. (BY MS. BAILEY) Do you intend to transfer  
17 any of the utility accounts from your mother's name  
18 into your name?

19 A. Sometime in the future, yes.

20 Q. Okay. At this point do you know when you  
21 expect to do that?

22 A. No, ma'am, I don't. I was home taking care  
23 of mom, make sure she'd take her medication, make  
24 sure she'd eat, and all that. So she was basically  
25 the one responsible for paying the bills. And now

0022

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.

0023

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.)

0024

1 Q. (BY MS. BAILEY) Have you ever had  
2 insurance on your vehicle?  
3 A. Yes.  
4 Q. Okay. How long have you not had insurance  
5 on it?  
6 A. Since about 2001.  
7 Q. Since 2001?  
8 A. Um-hum.  
9 Q. So, do you have a current registration on  
10 your motor vehicle?

Morrison, Georgia.txt

11 A. Um-hum.  
12 Q. Okay.  
13 MS. RAPP: I'm sorry, is that a yes?  
14 THE WITNESS: Yes. I'm sorry.  
15 Q. (BY MS. BAILEY) Do you know where that  
16 registration was mailed to?  
17 A. To the PO box.  
18 Q. To the PO box? Okay.  
19 okay. After you married in 2003, did  
20 you take any steps to change your name information  
21 with any public offices?  
22 A. No, ma'am, not right away.  
23 Q. Okay. Have you since that time in 2003  
24 taken any steps to change your name to your married  
25 name with any public offices?  
0025  
1 A. Yes.  
2 Q. And which offices would that be?  
3 A. Motor Vehicle Department.  
4 Q. Okay. And any others?  
5 A. Um -- not any public offices, no.  
6 Q. Okay. Did you change your name information  
7 with any credit card companies?  
8 A. No.  
9 Q. Okay. How about with any creditors in  
10 general?  
11 A. No, don't have any creditors.  
12 Q. Okay. Did you change your name with any  
13 utility companies?  
14 A. Don't have any utility --  
15 Q. Okay. Okay. You said -- the reason I  
16 asked that question or those questions is that I  
17 asked you if you had changed your name with any other  
18 public offices. And you said, no, no public offices.  
19 But I wondered if there were any other companies or  
20 entities that you had changed your name with, that  
21 you can think of, as you sit here.  
22 A. The only major one that I changed my name  
23 with is the IRS.  
24 Q. Okay.  
25 A. Yeah, Internal Revenue Department.  
0026  
1 Q. And do you recall when you did that?  
2 A. And that -- oh, no, ma'am. And my Social  
3 Security card.  
4 Q. What did you have to do to change your name  
5 information with the Social Security Administration?  
6 A. I had to go down to their office and ask  
7 for a name change.  
8 Q. And did you fill out some kind of form to  
9 do that?  
10 A. Yes, ma'am.  
11 Q. Okay.  
12 A. Social Security form.  
13 Q. Did they issue you a new card at that time?  
14 A. It took a couple weeks before I got it, but  
15 yes.  
16 Q. Okay. And is there any fee for doing that  
17 with the SSA?  
18 A. No.  
19 Q. Okay. And do you recall when you did that?  
20 A. Oh, golly, gee. Probably 2006 -- end of  
21 2006, beginning of 2007. Um... April, 2007.

22 Q. Okay. And how about you had mentioned that  
23 you had changed your name information with the Motor  
24 Vehicle Division?

25 A. Um-hum.

0027

1 Q. Do you recall when that was?

2 A. April, 2007.

3 Q. Okay.

4 A. Because Motor Vehicle has to go by what  
5 social security has.

6 Q. Okay.

7 A. So after the change with social security,  
8 then I had to go to Motor Vehicle.

9 Q. I see. Okay. And did you pay a fee when  
10 you went to Motor Vehicle Division to update your  
11 name information with that office?

12 A. I believe it was twelve dollars, but I'm  
13 not sure.

14 Q. Okay. Are you currently employed?

15 A. No, ma'am.

16 Q. If you would, would you please walk me  
17 through your employment history, just generally  
18 telling me who you worked for in the past and  
19 generally the time frame that you worked for them?

20 A. Hm. Well, I worked for the government,  
21 civil service. I worked for the government for 19  
22 years. It ended December the 24th, 1992. At which  
23 time I started doing income tax, in March of 1993.  
24 And I also was a Notary for the State of Arizona.  
25 And my Notary ended December, 2006. And I haven't

0028

1 renewed it. That's about it, since 2006, when my  
2 Notary ended.

3 Q. And you have not been employed since  
4 December of 2006?

5 A. That's when my Notary ended, when I would  
6 notarize people's paperwork. I haven't had -- I  
7 haven't gone back to work for the government or any  
8 other job anywhere.

9 Q. Okay. You mentioned that you did tax work  
10 beginning in March of 1993?

11 A. Um-hum.

12 Q. And how long did you do that work?

13 A. I'm still doing it.

14 Q. Okay.

15 A. When people come to me to get me to --

16 Q. Okay. Is that sort of -- are you  
17 self-employed in that?

18 A. Yes, ma'am.

19 Q. Okay. Can you estimate for me what your  
20 income is from your tax work in a given year, any  
21 given year?

22 A. From about January to April I guess about  
23 \$2200 I can earn. I don't charge that much for doing  
24 taxes.

25 Q. Okay.

0029

1 A. Some people tell me I'm stupid for not  
2 doing it, but...

3 Q. And how about for the Notary work that you  
4 did, I understand that it ended in December of '06?

5 A. Um-hum.

6 Q. Can you estimate while you were doing that

7 work what income you earned through that in a given  
8 year?

9 A. It wasn't constant notarizing people's  
10 paperwork. Like notarizing vehicle titles. A lot of  
11 my friends and clients had titles to a vehicle that  
12 they sold, and they'd come to me and say, would you  
13 notarize my title, I'm selling it to this guy. And  
14 most I would charge is like five dollars --

15 Q. Um-hum.

16 A. -- to do it. So, from January to the end  
17 of the year, there were some months that I didn't  
18 even do anything. So I don't know. I couldn't give  
19 you a -- a basic estimate, because a lot of times I  
20 didn't do anything.

21 Q. Yeah. Okay. And when did you -- you said  
22 your -- your -- would it be fair to say Notary  
23 credentials ended in December of '06? I'm not sure  
24 what -- is it certification?

25 A. You are a Notary for four years.

0030

1 Q. Okay.

2 A. Mine ended in December of 2006.

3 Q. Okay. And when did you first get that  
4 Notary credential?

5 A. Well, this is my second time having it.  
6 Oh, gee. Well, six, five, four, -- six, five, four,  
7 three. And then three, two, one... I'm going to say  
8 like 19 --

9 Q. Is it two four-year terms?

10 A. Yes, ma'am.

11 Q. Okay.

12 A. Yes, ma'am.

13 Q. So maybe 1998?

14 A. '98, '99, 2000, 2001, 2002 --

15 MR. URIAS: If you don't know, don't  
16 speculate. But just do your best.

17 THE WITNESS: Yeah.

18 Q. (BY MS. BAILEY) Okay. That's fine.

19 A. Yeah, two four-year terms.

20 Q. Okay. Ending in 2006?

21 A. Yes, ma'am.

22 Q. Okay. Do you currently receive any income?

23 A. No, ma'am.

24 Q. Do you receive any kind of public benefits?

25 A. I get food stamps.

0031

1 Q. Food stamps?

2 A. Um-hum.

3 Q. Okay. What would you estimate the amount  
4 of the food stamps to be by month?

5 A. 146. 146. No, it just went up. 153.

6 Q. Okay. And how do you presently pay for the  
7 utility services in the home where you live?

8 A. Well, right now they're paid up. But they  
9 will be coming soon where I need to pay them.

10 Q. Okay. And you -- do you intend to look for  
11 employment?

12 A. Yes, ma'am.

13 Q. In the near future?

14 A. In the present, actually, yes.

15 Q. Okay. You're presently looking for  
16 employment?

17 A. Yes, ma'am.

18 Q. Okay. You mentioned that you had worked  
19 for 19 years in civil service?

20 A. Um-hum.

21 Q. Which government agency was that?

22 A. I worked at the United States Army, Yuma  
23 Proving Grounds.

24 Q. Okay.

25 A. And I worked at Fort Huachuca, Sierra

0032

1 Vista. And I worked also at the Marine Corps Air  
2 Station, Yuma.

3 Q. What did you do -- were you finished with  
4 your answer?

5 A. And -- I'm -- go ahead.

6 Q. I'm sorry. Were those the three places  
7 that you worked in civil service?

8 A. I also went to Camp Pendleton.

9 Q. Okay.

10 A. But I was only there a couple months.

11 Q. Okay. What was your position? What did  
12 you do when you worked in civil service?

13 A. I started out as a clerk typist. And I  
14 worked in the meat department of the commissary. I  
15 was a meat handler. I worked in the produce  
16 department at the commissary. I worked in the  
17 headquarters office as a secretary. I worked in the  
18 security department as a security clerk. I worked --  
19 oh, God. Oh, God, what -- where else did I work.

20 I worked in the supply department as a  
21 supply clerk. I worked in the personnel office as a  
22 personnel clerk. Now it's Human Resources, but --  
23 what else did I do.

24 I even worked at the dispensary. I  
25 worked in the military personnel office. Um -- I

0033

1 worked in the Public Affairs office.

2 I got all that experience, yes.

3 Q. By the time you left there in December of  
4 1992 --

5 A. Um-hum.

6 Q. -- can you tell me what your annual income  
7 was?

8 A. Oh, gee. I was getting like \$11.63 an hour  
9 when I left. So, figuring that out, roughly, yeah.

10 Q. Okay. And that was a full-time position?

11 A. Yes, ma'am.

12 Q. Okay. And do you receive any kind of  
13 retirement or pension from that job?

14 A. No, ma'am.

15 Q. Okay. And what is the highest level of  
16 education that you have attained?

17 A. I have gone to Arizona Western College,  
18 where I took two years.

19 Q. Did you obtain a degree while you were  
20 there?

21 A. No, I just got a certificate.

22 Q. Okay. What did you study there?

23 A. Business management and auto mechanics.

24 Q. Oh, okay. When did you get your  
25 certificate from the Arizona Western College?

0034

1 A. Oh, gee. Probably in 1976, maybe.

2 Q. Okay. Are you registered to vote here in

3 Arizona?  
4 A. Yes, ma'am.  
5 Q. And did you register here in Yuma County?  
6 A. Yes, ma'am.  
7 Q. Okay. When did you first register to vote?  
8 A. Hm. 2004.  
9 Q. And how did you come to register to vote?  
10 A. My husband and I went shopping at Del Sol  
11 Market down on 16th and 4th Avenue. And there was  
12 this lady standing outside signing people up to  
13 register.  
14 Q. Okay. What made you decide to register to  
15 vote at that time?  
16 A. He wanted to do it. And I said, oh, sure,  
17 hubby.  
18 Q. Okay. That was not long after you had just  
19 been married; right?  
20 A. Yes, ma'am.  
21 Q. Okay. So, do you recall, was the woman  
22 that helped you register to vote, was she with an  
23 organization?  
24 A. I really don't know.  
25 Q. If she was, you don't recall the name of  
0035  
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  
0036  
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.

0037

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?

0038

1 A. Yes.  
2 Q. Did you ever work as a polling place  
3 worker?  
4 A. No, ma'am.  
5 Q. No? Okay. I was just curious about that.  
6 were you ever contacted to work at a  
7 polling place?  
8 A. No, ma'am. No.  
9 Q. Okay. If you would turn to the first page  
10 of this exhibit.  
11 A. Um-hum.  
12 Q. Again, I don't -- I will ask you, actually,  
13 have you seen this page before?  
14 A. No.  
15 Q. Okay. You see towards the top, it has  
16 name, and it lists Georgia Flores-Morrison, your  
17 middle name is Ann? Do you see that?  
18 A. Um-hum.  
19 Q. And does it include your correct current  
20 address?  
21 A. Yes.  
22 Q. Okay. And it includes your PO box that you  
23 no longer have, but that was the PO box number that  
24 you had until recently?

25 A. Yes.

0039

1 Q. Okay. I wanted to ask you, just direct  
2 your attention to towards the right side of that  
3 exhibit, that page. There is a column that says  
4 election?

5 A. Um-hum.

6 Q. And underneath it it says 2006. And then  
7 underneath that it says 2004?

8 A. Um-hum.

9 Q. Do you see where I am?

10 A. Um-hum.

11 Q. Okay. And to the right of that it  
12 indicates primary and general?

13 A. Um-hum.

14 Q. Okay. And there is a handwritten notation.  
15 And I have no idea who made that handwritten notation  
16 towards the bottom. It says, no voting history, and  
17 an arrow pointing up to that election category?

18 A. Yes.

19 Q. And I wanted to ask you if you had voted in  
20 the 2004 general election.

21 A. No.

22 Q. No? Okay. And I take it you did not vote  
23 in the 2004 primary election?

24 A. No.

25 Q. Is that correct?

0040

1 A. Yes.

2 Q. And did you vote in the 2006 primary  
3 election?

4 A. No.

5 Q. Okay. And did you vote in the 2006 general  
6 election?

7 A. No.

8 Q. Okay. And is it correct that you attempted  
9 to vote in the 2006 general election?

10 A. Yes.

11 Q. Okay. I'm going to ask you about that in  
12 just a moment. But I wanted to ask you if you have  
13 ever voted in any Arizona election?

14 A. No.

15 Q. Okay. And have you ever voted in any  
16 elections outside of Arizona?

17 A. No.

18 Q. Okay. When you had registered back in  
19 September of 2004, did you intend at that time to  
20 vote in the general election of 2004?

21 A. Yes.

22 Q. And what happened, why didn't you vote in  
23 the general election of 2004?

24 A. My husband and I started having problems,  
25 and didn't have my mind on voting.

0041

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,

0042

1 Flores-Morrison?

2 A. Um-hum.

3 Q. I'm a little bit confused about how you  
4 wrote the name -- you had testified today, as I  
5 understand, you go by the name of Morrison-Flores?

6 A. Um-hum.

7 Q. How is it that you came to write it as  
8 Flores-Morrison?

9 MR. URIAS: Objection, form.

10 Just to clarify, I'm not sure, did she  
11 testify that she filled it out? I'm not sure that  
12 she did. But go ahead and ask her the question  
13 again.

14 Q. (BY MS. BAILEY) Oh. I thought that you  
15 had testified that you filled out this form?

16 A. Yes.

17 Q. Okay. And I was just trying to get  
18 clarification on how you put down your name on the  
19 form. Because, as I understood your testimony, you  
20 go by the name of Georgia Morrison-Flores. And this  
21 box indicates the last name of Flores-Morrison. So,  
22 what did you understand when you -- when you were  
23 writing that down as Flores-Morrison?

24 A. Last name Flores. Maiden name is Morrison.  
25 Georgia.

0043

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?