

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
0044
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.
0045
1 Q. Okay. Do you remember the names of any of
2 those poll workers?
3 A. Oh, gee.
4 I knew my neighbor. Her name is Joyce
5 Hasso.
6 Q. Okay.
7 A. Oh, God. I can't remember the other three
8 ladies.
9 Q. How did you know the other three?
10 A. They knew my mom and knew my dad. And they
11 knew me from being mom and dad's daughter.
12 Q. Okay. And when they told you that the
13 names on your license and the signature roster didn't
14 match, did they tell you anything else?
15 A. That I couldn't vote because it didn't
16 match.
17 Q. Okay. Did they ask you if you had any
18 other forms of identification at that time?
19 A. No.
20 Q. No? And did they ask you -- did they tell
21 you that you could vote a provisional ballot at that
22 time?
23 A. No.
24 Q. Okay. Was anything else said once they
25 told you that you couldn't vote? Did you respond in
0046
1 any way?
2 A. Well, I kind of told my neighbor, oh, you
3 know me. You know, it's not like I'm a phoney-
4 baloney, but I'm the real thing, and it's me. And
5 she said, no, we got to go by what's in the record.

6 Q. Okay. And was anything else said then at
7 that time?
8 A. No, I just thanked them. My mother, I went
9 in and helped my mother vote. And we did our -- or
10 she did her little voting, marked who she wanted, we
11 left.
12 Q. Okay. Were you aware of -- were you aware
13 that you could vote a provisional ballot at that
14 time?
15 A. Well, I thought when I filled out my
16 voter's registration that I could go and vote. But,
17 no, had to have your ID same as your voter
18 registration. And that's what stopped me from doing
19 it.
20 Q. Okay. Did your mother provide
21 identification at that time?
22 A. Yeah, I had --
23 Q. Do you recall?
24 A. Yeah, I had her identification with me.
25 Q. Okay. What kind of identification did she
0047 provide?
1 A. Her old driver's license.
2 Q. Okay. Did you have any other forms of
3 identification with you? I understand that you
4 testified that they did not ask for any other forms
5 of identification, but did you have any with you at
6 that time?
7 A. I had took my purse with me, with all of my
8 other ones. But they only wanted to see my driver's
9 license.
10 Q. Okay. What other forms of identification
11 did you have with you at the time?
12 A. Oh, I had my college ID. Also I have not
13 only a driver's license, I also have an Arizona
14 picture ID. But they wanted driver's license, so...
15 So I showed them my driver's license.
16 Q. Okay.
17 Did you know before you went to vote
18 in November of 2006 that you would need
19 identification to vote at the polls?
20 A. Yes.
21 Q. Okay. How did you become aware of that?
22 A. Well, I figured they were going to ask for
23 an ID. So that's why I took my mother's ID and took
24 mine, too.
0048
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.

0049

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

0050

1 with names other than Georgia Ann Morrison-Flores or
2 Georgia Ann Morrison-Vasquez?
3 A. I had my original driver's license was
4 Georgia A. Morrison.
5 Q. Okay.
6 A. When I first got my first driver's license.
7 Q. Okay. When did you become Georgia A.
8 Morrison-Vasquez?
9 A. Um -- I married my first husband February
10 the 28, 19 -- 1989.
11 Q. Okay. And did you remain or keep the name
12 Georgia A. Morrison-Vasquez until you married in July
13 of 2003?
14 A. Yes.
15 Q. Okay. And when you went to the MVD in
16 April of 2007 did you receive a new driver's license?
17 A. I -- but I had to wait for my Social
18 Security card to come in the mail, to take it down to
19 Motor Vehicle and show them.
20 Q. Okay. And so, when you took your new
21 Social Security card in to the MVD, and you filled
22 out the MVD form --
23 A. Um-hum.
24 Q. -- to get a new license --
25 A. Um-hum.

0051

1 Q. -- with your new name, were you able to get

2 a new license at that time from MVD?
3 A. Yes.
4 Q. Okay.
5 A. Yes.
6 Q. And that new license reflected the name of
7 Georgia A. Morrison-Flores?
8 A. Yes.
9 Q. Okay. Why did you decide to -- to do that
10 in April of 2007?
11 A. I was just -- what's the word --
12 procrastinating, and --
13 Q. Oh.
14 A. And it meant changing other things. And I
15 wasn't ready yet to change it. So I kind of just
16 dragged my feet. And finally said, I'm not a Vasquez
17 anymore, I'm a Flores.
18 Q. I see.
19 (Exhibit 2 marked for identification.)
20 Q. (BY MS. BAILEY) Okay. I am handing you
21 what has been marked Exhibit 2. (Tenders.)
22 A. (Complies.) Thank you.
23 Q. And I will represent to you that Exhibit 2
24 is a collection of about twelve pages that are being
25 produced actually again in response to a request
0052
1 by -- by your lawyers in this case.
2 A. Um-hum.
3 Q. This -- these pages were generated by the
4 Arizona Motor Vehicle Division.
5 A. Um-hum.
6 Q. And I don't expect that you've ever seen
7 these before.
8 A. I recognize some of the numbers, yeah.
9 Q. Oh, okay. But I just wanted to ask you a
10 few questions about some of the information that's
11 reflected in here.
12 A. Um-hum.
13 Q. First of all, I will just ask you if you
14 would take a look at the first page of this exhibit,
15 just to confirm some of the information that is on
16 here.
17 A. Um-hum. (Complies.)
18 Q. It lists the name Georgia Ann
19 Morrison-Flores. And that is you; correct?
20 A. Um-hum.
21 Q. Is that yes?
22 A. Yes.
23 Q. It's okay. It's easy to forget.
24 A. (Nods head up and down.)
25 Q. It lists a residence address of 510 South
0053
1 17th Avenue in Yuma. And that's your address;
2 correct?
3 A. Yes.
4 Q. Okay. And it lists an expiration date
5 of -- I don't know if -- it's up towards the top
6 right side. It says EXP date?
7 A. Um-hum. Yes.
8 Q. 6/8/2018. Is that when your license is due
9 to expire?
10 A. Yes.
11 Q. Okay. And your date of birth is June 8th,
12 1953? Is that correct?

13 A. Yes.
14 Q. And according to this, and I understand
15 that you haven't seen this before, but it has a
16 category issue date. I don't know if you see that.
17 It's towards the right side, part way down.
18 A. Um-hum.
19 Q. And it indicates April 5th, 2007?
20 A. Um-hum.
21 Q. Is that the day that you went in to -- to
22 get a new license from MVD?
23 A. April, yes.
24 Q. Okay. It also lists towards the left side
25 of this first page, it says current Social Security,
0054
1 and it lists a number of 7319?
2 A. Yes.
3 Q. Are those the last four numbers of your
4 Social Security number?
5 A. Yes.
6 Q. Okay. I'm going to ask you, if you would,
7 to turn over to the last page, which is handwritten
8 page twelve at the bottom right corner of this
9 Exhibit 2.
10 A. (Complies.)
11 Q. And it says at the top of this, customer
12 fee segment. Do you see that?
13 A. Um-hum.
14 Q. And again, I know you haven't had an
15 opportunity to look at this, but I wanted to ask you
16 about the entries that are made here, to see if -- if
17 maybe I can make some sense of this.
18 The first entry, and it's a little bit
19 difficult to read, but if you see under description
20 -- (Indicating.) --
21 A. Um-hum.
22 Q. -- towards the left top?
23 A. Um-hum.
24 Q. And sort of right beneath that and off to
25 the left it has a date of April 5th, 2007? Do you
0055
1 see that? (Indicating.)
2 A. Yes.
3 Q. Okay. And then underneath that, mid way
4 through the page, is the word duplicate?
5 MR. URIAS: Objection.
6 THE WITNESS: Um-hum.
7 MR. URIAS: I'm going to object to a
8 line of questioning off of this document. This is
9 not something that Ms. Morrison-Flores might be
10 familiar with or had anything to do with. I know
11 it's something from the MVD. So, to the extent that
12 she's saying that those things actually mean those
13 dates, I'm not sure that she can testify to that.
14 But you're free to ask her questions, of course,
15 about the information itself.
16 MS. BAILEY: Sure.
17 Q. (BY MS. BAILEY) And, as I mentioned, I
18 understand that you haven't seen this document
19 before. Is that correct?
20 A. Correct.
21 Q. Okay. And I understand that you can't
22 attest to the information. But I am going to ask you
23 if any of this information that -- how I read it may

24 refresh your recollection as to certain steps that
25 you took with the MVD. So I understand the

0056

1 objection.

2 MR. URIAS: Okay.

3 Q. (BY MS. BAILEY) So that first entry that
4 says duplicate --

5 A. Um-hum.

6 Q. -- if you look towards the right there,
7 there is a four dollar --

8 A. Um-hum.

9 Q. Do you think it's possible that it was four
10 dollars that you paid for your duplicate at that
11 time?

12 A. Um-hum.

13 Q. You had testified before that you thought
14 it might have been twelve. Do you recall one way or
15 the other what fee that you paid when you went in in
16 April of 2007?

17 MR. URIAS: Objection, asked and
18 answered. Go ahead.

19 THE WITNESS: I know that twelve
20 dollars is a transfer fee. Four dollars for a
21 duplicate license. Hm. Oh, God. Okay, twelve
22 dollars transfer fee. Transfer of ownership from one
23 registered owner to one new owner, I believe is
24 twelve dollars. Duplicate driver's license is four
25 dollars.

0057

1 Q. (BY MS. BAILEY) Okay. That's fine. I
2 actually was going to ask you what a transfer fee
3 was. I wasn't sure what you were referring to.

4 A. Okay. Transfer of one owner of a vehicle
5 to another owner of a vehicle is twelve dollars.
6 Okay?

7 Q. Okay.

8 I wanted to ask you, and I understand
9 it's been awhile since you were in there --

10 A. Yeah.

11 Q. -- this page reflects three other entries.
12 And again, I understand that you can't attest to this
13 document, but I did want to ask you, it -- it appears
14 to me that according to this record that you had gone
15 in and obtained a duplicate license on other
16 occasions. And so I wanted to ask you about that.
17 Had you ever gone in before April of 2007 to the MVD
18 and obtained a duplicate driver's license?

19 A. Yes, I have.

20 Q. And on how many occasions have you done
21 that?

22 A. Several. 'Cause I misplaced my wallet one
23 time, couldn't find my driver's license. And another
24 time, driver's license got washed, before they
25 started to use laminate -- laminated.

0058

1 Q. All right.

2 A. So, yeah, I recognize duplicates.

3 Q. So, do you recall how many times prior to
4 April of 2007 you had gone in and requested a
5 duplicate driver's license?

6 A. Hm. I'm going to -- maybe two, three
7 times.

8 Q. Okay. And do you recall about when you did

9 that?
10 A. No, ma'am.
11 Q. Okay. I'm going to ask you if you would
12 look at this page twelve again, and tell me if you
13 possibly went in on September 30th of 2003 for a
14 duplicate license, in to MVD?
15 A. Possibly did.
16 Q. Okay. And how about do you think it's
17 possible that you went in on March 14th of 2002 --
18 A. Um-hum.
19 Q. -- and obtained a duplicate license?
20 A. Yes. Yes.
21 Q. And is it possible that you went in and
22 obtained a duplicate license on December 28th of
23 2001?
24 A. Yes.
25 Q. Okay. And each time you went in did you
0059
1 pay a four dollar charge for the duplicate license?
2 A. Yes, I did.
3 Q. Okay.
4 A. Yes.
5 Q. All right. Do you have your license with
6 you today?
7 A. Yes.
8 Q. If you wouldn't mind to take that out, I
9 would like to ask you a few questions about it.
10 A. Okay. (Complies.)
11 Q. Would you please tell me what the name is
12 on that license?
13 A. Georgia Ann Morrison-Flores.
14 Q. And what is the issue date on that license?
15 A. This was issued April 5th, 2007.
16 Q. And what is the expiration date on that
17 license?
18 A. 06/08/2018.
19 Q. And is the photograph on that license you?
20 A. Yes.
21 Q. Okay. And what is the address listed on
22 that license?
23 A. 510 South 17th Avenue, Yuma, Arizona,
24 85364-2808.
25 Q. Okay. Thank you.
0060
1 A. We're not going to discuss the weight;
2 right?
3 Q. Okay. No, I promise.
4 A. Okay. Thank you.
5 MS. RAPP: On any of our driver's
6 licenses.
7 MS. BAILEY: That's right.
8 Q. (BY MS. BAILEY) I don't want to repeat my
9 questions, so I'm trying to go back here quickly and
10 see if I had already asked about this.
11 I can't remember if I asked. So, if I
12 did, I'm sorry.
13 A. Okay.
14 Q. I know that you have mentioned that you
15 have a vehicle registration for your vehicle.
16 A. Um-hum.
17 Q. Is that correct?
18 A. Um-hum.
19 Q. Does the vehicle registration have your

20 address on that?

21 A. It has the PO box on the registration.

22 Q. Okay. And that's the --

23 A. 1349.

24 Q. PO Box 1349?

25 A. Yes.

0061

1 Q. You had mentioned I think when you were
2 telling me about going in and attempting to vote in
3 2006 that you did have some other identification with
4 you. And I thought you mentioned you had a college
5 ID with you. Is that correct?

6 A. Yes.

7 Q. What -- was that for Western Arizona
8 college?

9 A. Arizona Western College. Yes.

10 Q. Arizona Western College. Does that
11 identification have your address on it?

12 A. No.

13 Q. Okay.

14 A. No.

15 Q. I didn't think it probably did, but I
16 wanted to check.

17 A. Yes.

18 Q. Do you have any other government issued
19 identification of any kind?

20 A. I have old civil service ID. But I don't
21 carry it around. It's just like my souvenir.

22 Q. Okay.

23 A. Hey, I used to work there.

24 Q. Right. Do those -- does that ID have an
25 expiration on its face?

0062

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?

0063

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.
0064
1 Q. why not?
2 A. Just seems lazy.
3 Q. Oh.
4 A. Go down there and do it.
5 Q. You like to go in to the polls?
6 A. (Nods head up and down.)
7 Q. Okay. But you're aware of how you would go
8 about --
9 A. Yes, ma'am.
10 Q. -- getting an early ballot?
11 A. Yes, ma'am.
12 Q. And you're aware that you could call and
13 request one from the County?
14 A. Yes, ma'am.
15 Q. Okay. Are you aware that you can take an
16 early ballot in to the polling place on Election Day
17 to cast that ballot?
18 A. Yes, ma'am.
19 Q. Okay. How far is your polling place from
20 where you live?
21 A. We live on 17th Avenue and 5th -- well,
22 "we." I live on 17th Avenue and 5th Street. The
23 polling place is on 3rd and -- 15, 14 -- 13th.
24 Q. Okay. For someone like me who has no idea
25 what Yuma is like --
0065
1 A. I'm sorry. Martin Luther King Center.
2 Q. How far is that?
3 A. The center is on 3rd and 13th, right on the
4 corner from Sanguinetti baseball park. And where I
5 live is on 5th Street and 17th Avenue. So you're
6 like one, two, three -- four blocks over.
7 Q. Would you say it's less than a mile?
8 A. Yeah. Yes.
9 Q. Okay. Have you ever received any mail
10 from -- from the Yuma County Elections Department?
11 A. For myself?
12 Q. Um-hum, for yourself.
13 A. Or -- yes, I've gotten when they send out
14 these booklets that tells you about the different --
15 yeah, I've gotten that.

16 Q. Like the publicity pamphlet?
17 A. That tells you about the different --
18 Q. A sample ballot?
19 A. Yes, ma'am.
20 Q. Okay. Did you receive a publicity pamphlet
21 before the 2007 general election in November?
22 A. 2007?
23 Q. Do you recall receiving any -- any election
24 mail from Yuma County?
25 A. I had received a booklet, about -- almost

0066

1 an -- about an inch thick, that tells about the
2 different petitions that was going on, proposition
3 this, proposition that. I don't remember what date
4 it was.
5 Q. Okay. Do you recall whether it was
6 addressed to you?
7 A. It was -- yes, ma'am.
8 Q. Okay. I want to ask you again a little bit
9 about your involvement in this lawsuit, just to make
10 sure I understand what you are claiming in this
11 lawsuit.

12 It's my understanding from your
13 testimony that you are claiming that you were
14 deprived of the right to vote in November of 2006 in
15 the general election. Is that correct?

16 A. Yes.
17 Q. Okay. Are there any other injuries that
18 you are complaining about in this lawsuit?

19 A. No.
20 Q. Okay. It's the loss of the right to vote
21 in November of 2006?

22 MR. URIAS: Objection, form.
23 THE WITNESS: Yes.
24 Q. (BY MS. BAILEY) Yes? Okay. But you do
25 expect to vote in the 2008 --

0067

1 A. If -- if --
2 Q. -- elections?
3 A. If there's no problems, yes.
4 Q. Okay. Do you expect with your driver's
5 license that you currently have that you will be able
6 to vote at the polls on Election Day in November of
7 2008?

8 MR. URIAS: Objection, form.
9 Go ahead.
10 THE WITNESS: I won't know until I get
11 there. Hopefully, yes. But I won't know until I get
12 there.

13 Q. (BY MS. BAILEY) Okay. But what you were
14 told in November of 2006 at the polls was that the
15 reason you couldn't use your driver's license to vote
16 was that name did not match the signature -- the
17 voter's signature roster; is that correct?

18 A. The name did not match what they had on
19 their computer printout, their records.

20 Q. Okay. Do you know any of the other
21 plaintiffs in this lawsuit?

22 A. No.
23 Q. Have you ever met any of the other
24 plaintiffs in this lawsuit?

25 A. No, I haven't.

0068

1 Q. Have you ever talked with any of the other
2 Plaintiffs in this lawsuit?

3 A. No.

4 Q. Okay. Are you familiar with the
5 organization called Valle Del sol? Valle Del sol?

6 A. Valle Del sol?

7 Q. Yes.

8 A. Is that the market? I'm sorry.

9 Q. Oh, that's a Plaintiff in this lawsuit.
10 It's an organization. And I'm just asking if you're
11 familiar with it.

12 A. No.

13 Q. Okay. Are you familiar with an
14 organization called Friendly House?

15 A. (Shakes head from side to side.)

16 Q. Okay. How about Chicanos Por La Causa?

17 A. I've heard of them.

18 Q. Heard of them?

19 A. Yeah, I believe --

20 THE COURT REPORTER: Excuse me --

21 MS. RAPP: Can we -- go ahead.

22 THE WITNESS: I believe it's -- there
23 is an office over in Somerton. Yeah.

24 Q. (BY MS. BAILEY) Okay.

25 MS. RAPP: Can we go back to the

0069
1 question before, so -- I don't know if I heard an
2 answer. So I don't know if the Court Reporter did,
3 either.

4 (Previous Q and A, Page 68, Lines
5 13 thru 15, read back by the
6 Reporter.)

7 Q. (BY MS. BAILEY) I'm sorry. I should have
8 asked for an audible answer. Are you familiar with
9 Friendly House?

10 A. No.

11 Q. Okay. Are you familiar with Arizona
12 Hispanic Community Forum?

13 A. No.

14 Q. How about an organization called Common
15 Cause?

16 A. I've heard of it, but I'm not sure what it
17 is.

18 Q. Okay. How about an organization called
19 Project Vote?

20 A. No.

21 Q. Okay. And are you familiar with an
22 organization called Association of Community
23 Organizations for Reform Now?

24 A. No.

25 Q. That's a mouthful.

0070
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?

Morrison, Georgia.txt

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.

0071

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.

EXAMINATION

10 BY MS. RAPP:

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

0072

1 Pendleton was in California. Am I wrong?
2 A. San Diego.
3 Q. There's one in -- there's two of them?
4 A. Well, the one I went to is in San Diego.
5 Q. Okay. You were in --
6 A. Camp Pendleton, San Diego.
7 MR. URIAS: She said -- a little while
8 ago she said Camp Pendleton, and Sierra Vista.
9 MS. RAPP: Oh, okay. I see.
10 Q. (BY MS. RAPP) Okay. Did you actually live
11 at Camp Pendleton for a little while?
12 A. It was only -- it was only what, maybe like
13 three months. Because my brother was stationed
14 there.
15 Q. My cousin was stationed there, too, when he
16 was in the Marine Corps.
17 A. Yes.
18 Q. Is there anywhere else that you lived
19 outside of Arizona other than the few months in Camp
20 Pendleton?
21 A. No.
22 Q. Okay. You mentioned to Ms. Bailey earlier

23 that in November of 2006 you had a photo -- an
24 Arizona photo ID that was not a driver's license; is
25 that correct?

0073

1 A. Yes.
2 Q. Do you know what name was on that
3 identification?
4 A. My -- my picture ID; right?
5 Q. Yes, your picture ID.
6 A. Georgia A. Morrison-Vasquez.
7 Q. It was Vasquez, as well?
8 A. Um-hum.
9 Q. Okay. Now, I think earlier you testified
10 that in September of 2003 you went to the MVD to get
11 a duplicate license. Is that correct?
12 A. Um-hum.
13 Q. Is that a yes?
14 A. Yes. I'm sorry.
15 Q. No, that's okay. Do you remember if you
16 went in to the Motor Vehicle Department or if you did
17 that online?
18 A. No, I went in to the Motor Vehicle
19 Department.
20 Q. Okay.
21 A. Where you had to get your number and sit
22 there.
23 Q. That's the worst, isn't it?
24 A. Oh, God help us.
25 Q. Did you have to fill out a form in order to

0074

1 do that?
2 A. Yes.
3 Q. Now, you were married in July of 2003; is
4 that correct?
5 A. Yes.
6 Q. When you went in, September of 2003, to get
7 your duplicate license, what name did you tell the
8 MVD?
9 A. Flores-Morrison. Georgia A.
10 Morrison-Flores.
11 Q. So the duplicate license that you got in
12 September of 2003 said Georgia A. Morrison-Flores on
13 it?
14 A. Georgia A. Morr -- I'm sorry. The
15 duplicate was in Georgia A. Morrison-Vasquez.
16 Q. Were you already married when you got that
17 duplicate to Mr. Flores?
18 A. I -- um -- 2003, yes.
19 Q. And, were you already using the name
20 Georgia Morrison-Flores at that point in time?
21 A. Yes.
22 Q. But you told the MVD that your name was
23 Georgia Morrison-Vasquez?
24 A. On my driver's license it was Georgia A.
25 Morrison-Vasquez.

0075

1 Q. when you filled out the new form in
2 September of 2003, what name did you tell the -- the
3 MVD that you were using?
4 A. When I filled out the form in 2003?
5 Q. Yes. I think you told me that in September
6 2000 --
7 A. It was Vasquez. Because that was still in

8 the records as Vasquez.
9 Q. Okay. why didn't you try to change your
10 name at that point in time?
11 A. I -- I hadn't got my new Social Security
12 card to take down to Motor Vehicle to show them that
13 my new name was Flores.
14 Q. Okay. when did you learn that you had to
15 have your Social Security card changed before you
16 could have your driver's license changed?
17 A. Oh, gee. I had called Motor Vehicle, and I
18 told them I needed to get a new name change. They
19 said at first I need to go to Social Security Office,
20 get it changed there, then bring it to the Motor
21 Vehicle Department to change it then.
22 Q. Okay.
23 A. But until then, Motor Vehicle was going to
24 go by what Social Security had on their record, which
25 was Vasquez.

0076

1 Q. Okay. But in September of 2003 you were
2 already going by Georgia Morrison-Flores; is that
3 correct?
4 A. Yes.
5 Q. Okay. when you first registered to vote in
6 Yuma County did you get a voter registration card?
7 A. Yes, I did.
8 Q. And did you have that voter registration
9 card in November of 2006?
10 A. 2006? Yeah, because -- yeah -- I, oh, gee,
11 where did I -- let me see. when I -- when I was
12 at -- when I saw the lady at Del Sol Market, we
13 filled that out. My name was listed as
14 Morrison-Flores. Georgia A. Morrison-Flores. But it
15 was still -- my driver's license name hadn't been
16 changed from Vasquez to Flores. So it was basically
17 still in the Motor Vehicle records that it was
18 Vasquez.
19 Q. Okay. Did you get a voter registration
20 card from the Elections Department or from the
21 Recorder's Office after you registered to vote?
22 A. Recorder's Office.
23 Q. And what name was on that card?
24 A. Flores.
25 Q. Did you -- when you went to vote in

0077

1 November of 2006 did you know where that card was?
2 A. Hm. I had it somewhere at the house.
3 Q. Okay.
4 A. Yeah. The card that I'm talking about,
5 when you fill out -- when we filled out the form at
6 Del Sol Market with this lady, it was like a
7 duplicate, like you fill out the front and then
8 underneath there was a duplicate. She gave us the
9 duplicate copy of this little blue and white form
10 that we filled out. So I had that.
11 Q. Did you get a card in the mail from the
12 Yuma County Recorder's Office at some point in time
13 after that?
14 A. Yeah, I got it in the mail.
15 Q. What did that card look like?
16 A. It was a little kind of -- (Indicating.) --
17 a little cardboard like paper.
18 Q. Okay.

19 A. Cardboard like.
20 Q. Do you know -- do you still have that card?
21 A. Yes.
22 Q. Do you know where it is?
23 A. Somewhere at the house.
24 Q. Okay. Could you find it, if you needed to?
25 A. I'm looking for it today for the guys. And

0078

1 I couldn't find it.
2 Q. Okay.
3 A. But I got it in the mail, showing to the
4 fact that I was now a registered voter.
5 Q. Do you know -- can you remember if you knew
6 where it was in November of 2006?
7 A. Somewhere at the house.
8 Q. Okay.
9 A. Yeah.
10 Q. But you don't know exactly where?
11 A. Yeah.
12 Q. That's fair?
13 A. Somewhere at the house. I'm sorry.
14 Q. No, that's okay. Did you know that you can
15 get a replacement card if you want one?
16 A. Yeah, but I -- I'm not sure, because at the
17 courthouse or voter's registration. There used to be
18 a place down here on Orange Avenue, right next to the
19 literacy place, where you can go. But I don't know
20 where it's at now. Probably at the courthouse, but
21 I'm not sure where I could go to get that copy of it.
22 Q. Okay. Do you know if there's a charge for
23 getting a replacement?
24 A. I don't know.
25 Q. Okay. You told Ms. Bailey earlier that you

0079

1 helped your mom vote early; is that correct?
2 A. Yes.
3 Q. Do you know about how many times you did
4 that?
5 A. What do you mean, how many times?
6 Q. Well, I know that you took her to the polls
7 at least in November of 2006; right?
8 A. Yes.
9 Q. And you said that you helped her fill out
10 an early ballot; also?
11 A. Yes.
12 Q. Did you only help her fill out an early
13 ballot once?
14 A. She did it one year, like maybe -- oh, gee,
15 I don't even remember the year that she did. They
16 sent it in the mail. And we did it, because I was
17 telling the -- when they sent it to you, there's a
18 little round metal -- a little round wire thing that
19 you have to use to punch, and they sent that.
20 Q. Oh.
21 A. Maybe -- I'm not sure what year it was.
22 Before 2006.
23 Q. That's okay. Did you only do it one time,
24 though?
25 A. Yes.

0080

1 Q. Okay. Now, can you look back at Exhibit 1
2 that Ms. Bailey handed you?
3 A. Um-hum. (Complies.)

4 Q. And look on the second page of that.
5 A. (Complies.)
6 Q. Do you see about four lines down it asks
7 the question, address where you have mail delivered?
8 A. Um-hum.
9 Q. And you have the PO box filled in there; is
10 that correct?
11 A. Yes.
12 Q. And I think you said earlier that you no
13 longer have that PO box; is that right?
14 A. Yes.
15 Q. Do you plan on updating your records with
16 Yuma County so that they're not sending your mail to
17 that PO box anymore?
18 A. Actually, I closed it when my mother died.
19 I closed the PO box in November.
20 Q. Okay. Did you tell the Voter Registration
21 Department?
22 A. I haven't told -- no, I haven't told them.
23 Q. Okay. Do you plan on telling them?
24 A. Yeah, 'cause -- 'cause the street address
25 is going to be where I'm going to be getting my mail.
0081
1 Q. Okay. And do you have any idea when you
2 plan on telling them that they need to send your mail
3 somewhere else?
4 A. After everything has been taken care of
5 with mom, then, yeah --
6 Q. Okay.
7 A. -- down the line. By the grace of God,
8 yeah.
9 Q. Have you -- have you received any mail from
10 the Yuma County Recorder's Office or Elections
11 Department since you closed that PO box?
12 A. No.
13 Q. Okay.
14 A. Because I just closed it in November.
15 Q. Okay. Now, a little earlier Ms. Bailey
16 asked you if you plan on voting in 2008. And you
17 said you hope so, as long as everything goes all
18 right, but that you didn't know -- you wouldn't know
19 until you showed up that day?
20 A. Until I show up.
21 Q. Is that what you testified?
22 A. Yes.
23 Q. Have you made any attempt to contact the
24 Yuma County Elections Department to see if the ID
25 that you have now is adequate for you to vote in
0082
1 2008?
2 A. No.
3 Q. No? Have you contacted the Recorder's
4 office to ask that question?
5 A. No.
6 Q. Have you asked anybody whether the
7 identification that you have now will allow you to
8 vote in 2008?
9 A. No.
10 Q. Do you plan on contacting anybody before
11 Election Day to find out?
12 A. Well, I'm hoping that it is okay.
13 Q. Um-hum.
14 A. Because my old one was Vasquez and their

15 record was Flores. So now that my new one is Flores,
16 their records should reflect Flores.

17 Q. Do you have any plans on calling anybody
18 before Election Day just to check?

19 A. No.

20 Q. Okay.

21 A. Not really.

22 Q. I was just curious.

23 A. Oh.

24 MS. RAPP: I don't think I have any
25 other questions. Thank you very much for your time

0083
1 today.

2 THE WITNESS: You're welcome. Thank
3 you.

4 EXAMINATION

5 BY MR. URIAS:

6 Q. I only have one quick question for you,
7 Ms. Morrison-Flores. And that is just to clarify,
8 earlier you were asked some questions by Ms. Bailey
9 regarding your -- the time that it took for you to go
10 in and have your name changed on your driver's
11 license. Do you remember that?

12 A. Um-hum.

13 Q. Okay. And I think you mentioned at one
14 point that part of the reason you waited awhile
15 before you changed it was because you were -- the
16 word was procrastination, I think you used that word.
17 Do you recall that?

18 A. Yes.

19 Q. Is there any other reason that you can
20 think of that may -- other than procrastination that
21 may have been a part of what took you awhile to
22 change your name on the driver's license?

23 A. Just basically that it's a process I had to
24 go through, like with the IRS ID. It was already in
25 the records as Vasquez. And to change it means

0084
1 changing -- probably getting a whole new number with
2 the IRS. So I kind of just kind of took my time
3 before I actually changed from Vasquez to Flores.

4 Q. And, when you say IRS number, what number
5 are you speaking of?

6 A. There is a CAF number that you have to use
7 when you call the IRS to find out about information
8 on people's taxes. And if you don't have this number
9 the IRS isn't going to talk to you. Plus, too, if
10 you don't have a power of attorney, they won't talk
11 to you. And on the records, my name is Georgia A.
12 Morrison-Vasquez, with my CAF number that I have to
13 use whenever I call the IRS. And to change it
14 means -- to change it would probably -- you would
15 have to get a whole new number. So I was just taking
16 my time on changing it.

17 Q. So the number that you are referring to is
18 some form of identification number --

19 A. Yes.

20 Q. -- that you had obtained from the IRS?

21 A. From the IRS.

22 Q. That had to do with you --

23 A. Yes.

24 Q. -- with you doing taxes for other people?

25 A. Yes.

0085

1 Q. Okay. And your -- okay. So that was part
2 of the reason why? Is there anything else, any other
3 reason that -- that you know would explain the time
4 that it took for you to change that?

5 A. Just that I didn't take the time to go and
6 do it.

7 Q. It would have taken some time?

8 A. (Nods head up and down.)

9 Q. Okay. You have to answer --

10 A. And it takes time before, because when you
11 go in and change your -- have your name changed, it
12 doesn't happen that very day you go in to do it.
13 It's going to take maybe anywhere from six, eight
14 weeks, to do it.

15 Q. Okay. Thank you for clarifying.

16 MR. URIAS: I have nothing further.

17 THE WITNESS: Thank you.

18 MS. BAILEY: Okay. I don't have
19 anything further. Thank you.

20 MS. RAPP: Thank you for coming today.

21 (The taking of the deposition was
22 concluded at 3:00 p.m.)

23
24

GEORGIA MORRISON FLORES

25

0086

1 CERTIFICATE OF REPORTER

2 State of Arizona)
3) ss.

4 County of Maricopa)

5 Be it known that the foregoing
6 deposition was taken before me, Pamela E.
7 Banas'-Cook, RPR, CCR, AZ CR No. 50259, pursuant to
8 Notice; that the witness before testifying was duly
9 sworn by me to testify to the whole truth; that the
10 said deposition was reported by me in machine
11 shorthand and thereafter produced under my direction;
12 that the foregoing 86 pages constitute a full, true
13 and accurate transcript of all proceedings had upon
14 the taking of said deposition, all done to the best
15 of my skill and ability.

16 I further certify that I am in no way
17 related to any of the parties hereto, nor am I in any
18 wise interested in the outcome hereof.

19 (X) Pursuant to request, notification was
20 provided that the deposition is available for review
21 and signature.

22 () Deposition review and signature was
23 not requested.

24

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

25