

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  
1 box?  
2 A. No, no longer have it.  
3 Q. Oh, you don't?  
4 A. No.  
5 Q. Okay. I understand at some point from your  
6 discovery responses you did have a post office box;  
7 correct?  
8 A. Yes, ma'am.  
9 Q. Okay. When did -- do you recall what that  
10 post office box address was?  
11 A. 1349. PO Box 1349.  
12 Q. Here in Yuma?  
13 A. Yes, ma'am. 85364 -- I'm sorry, 85366.  
14 Q. Okay. And for what period did you have  
15 that post office box address?  
16 A. Oh. Since about 1970 to about 2007.  
17 Q. Okay.  
18 A. I -- I canceled it when my mother died.  
19 Q. Okay. In November of 2007?  
20 A. Yes, ma'am.  
21 Q. Okay. Can you tell me what the fee was for  
22 that PO box?  
23 A. Oh. It varies. In fact, I think even for  
24 December I think it went up. Like 36, 39 dollars for  
25 every six months.  
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?

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 actualiy 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?