

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?

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  
Page 23

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