

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

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.

10 EXAMINATION

11 BY MS. RAPP:

12 Q. And I really truly only have a few, so
13 we'll be brief here. Much earlier Ms. Bailey asked
14 you if you lived in Arizona your whole life. Do you
15 remember when she asked you that?
16 A. Um-hum.
17 Q. And you said yes; is that correct?
18 A. Yes.
19 Q. And I think a little bit later on you
20 remembered that you were at Camp Pendleton for
21 awhile. Is that correct?
22 A. Camp Pendleton, and Sierra Vista.
23 Q. Oh, in Sierra Vista? Okay.
24 A. Um-hum.
25 Q. I was under the impression that Camp

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.)

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

25

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