

ANTOINETTE MAYS

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION

ASSOCIATION OF COMMUNITY )  
ORGANIZATIONS FOR REFORM NOW, )  
et al., )  
 )  
Plaintiffs, )  
 )  
vs. ) Case No. 08-4084-CV-NKL  
 )  
DEBORAH E. SCOTT, et al., )  
 )  
Defendants. )

DEPOSITION OF ANTOINETTE MAYS

Taken on behalf of the Plaintiffs

June 11, 2008

The Court Reporter:

Ms. Brenda Orsborn, RPR/CSR/CCR

Missouri CCR No. 914

Illinois CSR No. 084-003460

**Exhibit G**

ANTOINETTE MAYS

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Division.

Q. May I call you -- is it -- should I say Ms. Briguglio-Mays or just Ms. Mays?

A. Ms. Mays is fine. Ms. Mays is fine.

Q. And, Ms. Mays, what is your job title?

A. I'm an Eligibility Supervisor.

Q. Are you aware that our clients have sued the Missouri Department of Social Services in this case?

A. Yes.

Q. And are you aware that your deposition here today is to gather information that may be used in further proceedings in this case?

A. Yes.

Q. Have you testified at a deposition before?

A. No.

Q. Have you ever testified in court before?

A. Yeah.

Q. And when was that?

A. 1985.

Q. And the procedure for this deposition is that I will ask you questions, and you will answer the questions. You are obligated to answer the questions to the best of your ability.

A. (Witness nodding head.)

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2 as they come into -- in other -- in other words, the  
3 eligibility specialists have been to the formal  
4 training. As new policy and procedures, be it local  
5 or statewide, come into effect, we meet with our  
6 eligibility specialists and train them to make sure  
7 they are familiar with the policy change and if they  
8 have any questions, we -- we deal with that.

9 Q. And where -- where would the policy changes  
10 come from, the policies and procedures that you train  
11 your people on?

12 A. They would come from state office. Or if  
13 it's a local procedural change, it would come from our  
14 administrative offices.

15 Q. Since you have been in the position of  
16 supervisor, has any of the training concerned policies  
17 and procedures related to voter registration services?

18 A. We have -- well, any time a new eligibility  
19 specialist comes into the agency, one of the items  
20 they are trained on is the Voter Registration Act.

21 Q. Is that part of an orientation?

22 A. Yes.

23 Q. And then beyond that orientation, do you  
24 recall any new policies and procedures, any updates  
25 that are related to voter registration services?

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2 A. There -- there are forms that come when the  
3 form changes, when the form is updated, that is  
4 discussed in a monthly meeting. I remember that. And  
5 I remember a PowerPoint presentation that we -- we  
6 actually reviewed that as a group. There were a  
7 couple of things on the PowerPoint presentation that  
8 we just -- you know, we wanted to discuss. So we  
9 reviewed that as a group, and that's also reviewed  
10 with each new employee, as well.

11 Q. Can you tell me what happened in regards to  
12 the training when the new, you said the new form came  
13 in. I assume you're talking about the new voter  
14 registration form?

15 A. When there's an update on any form that we  
16 use, we discuss it. And that's one of the forms that  
17 we use, so it would be discussed.

18 Q. When was that?

19 A. I believe the last one was in 2006, but I  
20 wouldn't be able to tell you for sure.

21 Q. And do you remember sort of what the  
22 training consisted of around this new form?

23 A. I don't remember. I can tell you what I  
24 probably said.

25 Q. Sure.

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2 A. As a caseworker, we would just -- when an  
3 individual would come in to apply for benefits or to  
4 report a change or to complete a recertification,  
5 reinvestigation, we would provide them with the  
6 opportunity by using the voter registration cards and  
7 offer them the opportunity to vote, go over the form  
8 with them, help assist them, if they needed it.

9 If they chose not to vote, or if they say  
10 they were already registered and the information was  
11 current, we would point out -- well, we do point out,  
12 as I'm saying would, because I'm talking about, you  
13 know, when I was a caseworker, that they should also  
14 change their information on their voter registration  
15 if -- if they needed to do that, and that they could  
16 do that with us. We would have them -- we would ask  
17 them to sign the declination, mark "Yes", "No" or  
18 "No. Currently registered". So --

19 Q. And you're talking about what you did as  
20 a --

21 A. A caseworker.

22 Q. -- as a caseworker?

23 A. That did not change from that time. But  
24 I -- I guess what I'm saying is I'm not familiar with  
25 it because I was a supervisor. I'm familiar with it

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2 anyone -- has a supervisor or perhaps anyone who is, I  
3 guess, over the supervisors ever said, this is the  
4 point at which voter registration services need to be  
5 discussed during a case interview?

6 A. No.

7 Q. And so you mentioned a conversation that you  
8 had had with other supervisors about when voter  
9 registration services should come into the client  
10 interview process. Are there any guidelines at all  
11 that supervisors are to refer to in -- in terms of  
12 offering voter registration services or instructing  
13 employees to offer voter registration services?

14 A. You're not speaking with regards to at what  
15 point in the interview; you're just speaking in  
16 general?

17 Q. Well, I -- I asked the question, because it  
18 sounded as if you -- you had just a discussion with  
19 other supervisors about what they do. So I'm  
20 wondering is there anything that guides all of you.

21 A. We have an interview observation checklist.  
22 That's used in lieu of a case review. And in that  
23 observation checklist, voter registration being  
24 offered and discussed, as well as assistance with  
25 completing the voter registration form, is part of

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2 that interview observation checklist. So we do have a  
3 guide that ensures that that's being looked at. Does  
4 that answer your question?

5 Q. It does. Thank you. This checklist, is  
6 this something that the Chouteau -- am I saying it  
7 correctly?

8 A. Chouteau.

9 Q. Is this something that the Chouteau office  
10 has specifically? Are other offices using this  
11 checklist?

12 A. There's numerous checklists. There's one  
13 that's four pages long, there's one that's one page  
14 long, but they're all available to the supervisors and  
15 the supervisor training and supervisor tools online.

16 Q. And where did these checklists come from; do  
17 you know?

18 A. I would assume they were developed by  
19 either -- I don't.

20 Q. Okay. And do you know how long the voter  
21 registration portion has been part of this checklist?

22 A. I don't ever remember not seeing it on  
23 there, so I don't know how long. I don't know when it  
24 was added or how long, no.

25 Q. What happens -- I'm sorry. I didn't mean to

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2 relates to voter registration services?

3 A. I'm not sure I understand. I -- at first I  
4 thought you said monitoring voter registration  
5 services, but then you didn't. So I'm not sure what  
6 the question is.

7 Q. Okay. I probably asked a two-part question.  
8 First, I want to know, is there -- does your office,  
9 the Chouteau office that you're in, is there any  
10 policy, is there any procedure, are there any  
11 guidelines that your office has issued that relate to  
12 voter registration services in your office?

13 A. There's the orientation.

14 Q. Uh-huh.

15 A. Then there's the formal training that voter  
16 registration is a part of. There --

17 MS. DODGE: Is that from your local office,  
18 issued by your local office, or is that from the  
19 department? I think -- I think your question is about  
20 locally.

21 A. Locally, we have the orientation the first  
22 day they get there that we talk about the different  
23 in-house procedures. They're also trained by their  
24 supervisor, and learning what to do with voter  
25 registration is part of that training. We go down, we

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2 get the form. We do it this way. If it's filled out,  
3 we do this. That's part of the training. It's part  
4 of the component checklist that's used with our  
5 eligibility specialist.

6 Q. (By Ms. Ponder) Are you referring to the  
7 orientation training?

8 A. No. I'm referring to just daily training of  
9 an eligibility specialist that comes into our office.

10 Q. Daily training of eligibility specialists  
11 includes how to handle voter registration services?

12 A. Every day, something is different. And they  
13 go down with a different individual or with their  
14 supervisor, and during that time one of the components  
15 that we check that were discussed is the voter  
16 registration, how we do the voter registration. So I  
17 can't say that it's every day, but normally, it would  
18 be something that would be done probably two or  
19 three -- at least two or three times a week with a new  
20 eligibility specialist as they go down and -- and  
21 watch what's going on. So does that answer your  
22 question or --

23 Q. Yes, thank you.

24 A. As well as our case review system that is --  
25 it's done locally, but it's not a local policy or

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2 procedure.

3 Q. Can you describe the case review system?

4 A. The case review system is an automated  
5 system that we use to review case actions. And one of  
6 the items on that case review system is a review of  
7 comments in the system, and at that time we would look  
8 at the comments for voter registration and discuss it  
9 with them.

10 Q. How does the observation checklist fit in  
11 with the case review?

12 A. In lieu of -- in other words, if we're  
13 required to do four case reviews on a non-probationary  
14 worker, we could do three case reviews and one  
15 interview observation that month. It would meet that  
16 four-case requirement.

17 Q. Okay. The training of new employees that  
18 includes voter registration services, after those  
19 employees are no longer considered new, is there a way  
20 to monitor what they're doing in regards to voter  
21 registration services?

22 A. They would be monitored the same as a  
23 non-probationary after they finish a year.

24 Q. Is that the checklist or the case review  
25 system?

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2 Q. Okay. We were discussing voter registration  
3 as it pertains to employees who are no longer new.  
4 You mentioned that if there were problems with voter  
5 registration services for a caseworker, that it would  
6 be -- I guess the way that it would be found would  
7 have to be in the case review system or when you, you  
8 know, review the checklist when you do your four --  
9 your four reviews per month. Is that correct?

10 A. No.

11 Q. Okay.

12 A. Not -- if I get a -- I'm not sure how to say  
13 it. If I receive a call from a participant that is  
14 concerned with something that's going on with their  
15 case, I'll request that the case be brought to me. At  
16 that time, I review everything in the case. I review  
17 the case for any items that I might have a problem  
18 with. And if I don't see a voter registration card, a  
19 declination or I don't see comments with regards to  
20 voter registration, I will mention that, as well.

21 It won't necessarily be documented, because  
22 I look at hundreds of cases a week, just generally  
23 reviewing through cases. But it is something that I  
24 may say, "I don't see where this person signed a  
25 declination, but I also don't see where you put a