

# **EXHIBIT 2**

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1 A. Where I went to school?  
 2 Q. Uh-huh.  
 3 A. I went to NMSU, graduated in May of 1990.  
 4 Q. And was that a bachelor's degree?  
 5 A. Yes, ma'am.  
 6 Q. And is this your first position at the  
 7 sort of whole Human Services Department  
 8 organization, or have you previously worked for the  
 9 Department of Human Services?  
 10 A. I started in October of 1990 with Human  
 11 Services.  
 12 Q. And what was that job?  
 13 A. I started as a caseworker in the Anthony  
 14 ISD office.  
 15 Q. And how long did you work there?  
 16 A. Almost a year, or real close to a year.  
 17 Q. And what did you do after that?  
 18 A. I transferred to the Las Cruces office as  
 19 a caseworker.  
 20 Q. And how long did you work here as a  
 21 caseworker?  
 22 A. More or less three to four years as a  
 23 caseworker.  
 24 Q. And what happened after that?  
 25 A. I was promoted to quality control.

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1 your -- just very generally, what were you -- what  
 2 was your role?  
 3 A. Determining eligibility for all programs.  
 4 Q. And did you do any voter registration  
 5 services at that time?  
 6 A. I don't remember. It's too long ago.  
 7 Q. And do you remember, in quality control,  
 8 did that have anything to do with voter  
 9 registration?  
 10 A. Quality control was in reference to the  
 11 eligibility, determining if eligibility was done  
 12 correctly.  
 13 Q. And were you working directly with clients  
 14 at that time, at all?  
 15 A. I would do home visits. So a certain  
 16 amount each month.  
 17 Q. But, I'm sorry, you said there was no  
 18 voter registration?  
 19 A. I said it was in reference to reviewing  
 20 eligibility.  
 21 Q. Okay. And do you remember if you did  
 22 anything with registering people to vote?  
 23 A. No, I don't remember.  
 24 Q. And when you were supervising the ISD  
 25 office, can you tell me a little bit about what you

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1 Q. And how long were you in quality control?  
 2 A. Right around a year.  
 3 Q. And what year was that, that you began in  
 4 quality control, approximately?  
 5 A. About 1993.  
 6 Q. And I'm sorry, how long did you work there  
 7 again?  
 8 A. Quality control?  
 9 Q. Yes.  
 10 A. About a year.  
 11 Q. About a year? So 1993, 1994, probably?  
 12 A. More or less.  
 13 Q. And what do you do after that time?  
 14 A. Then I was promoted to a supervisor back  
 15 with the ISD office in Las Cruces.  
 16 Q. And how long were you in that position?  
 17 A. Approximately nine years.  
 18 Q. So that would be until around 2003; is  
 19 that correct?  
 20 A. For sure until August of 2003, because  
 21 that's when I was promoted to this position.  
 22 Q. Okay. And you have been in this position  
 23 ever since?  
 24 A. Yes.  
 25 Q. And when you were a caseworker, what was

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1 were doing at that time, what the day-to-day job was  
 2 for that?  
 3 A. Managing a unit of I don't know how many  
 4 people, five to six people of my own. As far as  
 5 timely, employees coming in on time, managerial  
 6 things, and ensuring eligibility was done correctly,  
 7 reviewing cases.  
 8 Q. And what was -- that was over all of the  
 9 office here, the Las Cruces --  
 10 A. One unit.  
 11 Q. It was one unit? And how many units are  
 12 there?  
 13 A. I couldn't tell you back then. We used to  
 14 be one office. Then we split into two offices. I  
 15 have no idea how many units there were at the time.  
 16 Q. Okay. And did that work -- did you work  
 17 with voter registration at all at that time?  
 18 A. I have no idea. I don't know. I don't  
 19 recall. It's been too long.  
 20 Q. And the employees that you were overseeing  
 21 at that time -- how many of them were there?  
 22 A. Approximately -- I'm just estimating --  
 23 five to six. That was normal.  
 24 Q. And what were their duties?  
 25 A. Determine eligibility.

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1 Q. And does that mean they were having client  
 2 interviews?  
 3 A. Oh, yes, definitely.  
 4 Q. And what else would they do to determine  
 5 eligibility?  
 6 A. Clients would apply, do an interview, they  
 7 would review information, income, expenses, whatever  
 8 the determining factors were for, depending what  
 9 program they applied for, and from there analyze it  
 10 and determine whether they were eligible or not.  
 11 Q. Uh-huh. And so, I'm sorry, can you just  
 12 tell me approximately again what the years were that  
 13 you were working in that supervisor position at ISD?  
 14 A. Approximately 1994 to definitely August of  
 15 2003. I don't know when -- I can't remember the  
 16 exact start date.  
 17 Q. And were the people that you were -- how  
 18 were you supervising your employees? Like what were  
 19 your interactions with them like?  
 20 A. I answered questions, I'd monitor their  
 21 time as far as coming and going, any questions,  
 22 reviewing cases, make sure it was accurate.  
 23 Q. Did you do evaluations of their  
 24 performance?  
 25 A. Definitely.

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1 voter registration? I don't recall.  
 2 Q. And so in your current position, what are  
 3 your general -- and I'm sorry, once again, you began  
 4 your current position in August of 2003?  
 5 A. Yes. That one I know.  
 6 Q. What are your general responsibilities in  
 7 this job?  
 8 A. Overall of the -- I'm responsible for this  
 9 office in general as far as supplies, the running of  
 10 the office, things like that. Also in charge of all  
 11 programs ensuring everything is running at the  
 12 standards set by the State and the feds. The  
 13 building, everything.  
 14 Q. And in this position, who do you report  
 15 to? Like who, you know, gives you instructions  
 16 about what you have been doing?  
 17 A. My regional manager is Cindy Salazar.  
 18 Q. And how long has that person been in that  
 19 position?  
 20 A. I don't know exact timeframe. I'm going  
 21 to estimate three to four years.  
 22 Q. And who was in that position beforehand?  
 23 A. Aurora Mendoza.  
 24 Q. And how long was she your supervisor?  
 25 A. From when I started in August -- no, no,

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1 Q. And how did you evaluate their  
 2 performance?  
 3 A. Based on the criteria at that time. It's  
 4 all changed. It changes every year, every two  
 5 years.  
 6 Q. And would you, say, sit in on some of  
 7 their interviews or how did you know how they were  
 8 performing?  
 9 A. By reviewing their cases.  
 10 Q. Okay.  
 11 A. Determining if they -- review and ensure  
 12 that they would determine benefits accurately.  
 13 Q. And were the people you were supervising  
 14 offering voter registration services?  
 15 A. I don't know. I can't recall.  
 16 Q. And did you instruct them about voter  
 17 registration services, anything that they should do  
 18 with regard to voter registration forms?  
 19 A. Again, that's a long time ago. I don't  
 20 recall. It's been way too long ago.  
 21 Q. And do you remember if anyone told you  
 22 anything that you should be instructing them  
 23 about -- did you get instructions about what you  
 24 should tell your employees about voter registration?  
 25 A. Do I remember getting instructions on

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1 no. Sorry. She wasn't. It was David Devitt before  
 2 her. I don't know timeframes.  
 3 Q. Uh-huh.  
 4 A. David Devitt hired me in August of 2003.  
 5 Q. And do you remember, just generally,  
 6 anything about how long David Devitt was in that  
 7 position before Aurora Mendoza?  
 8 A. I have no idea.  
 9 Q. And generally what do you do about voter  
 10 registration in your current position?  
 11 A. I ensure that all staff are offering voter  
 12 registration.  
 13 Q. Uh-huh.  
 14 A. I keep tallies and I report numbers.  
 15 Q. And how do you ensure that all staff are  
 16 offering voter registration?  
 17 A. I view -- not every day, not eight hours a  
 18 day, but I go around, I listen. I have got a  
 19 greeter at the front desk. They have been  
 20 instructed to ask everybody that comes in. But I  
 21 know we're required to ask on application renewal  
 22 and address change, but try and get everybody in the  
 23 habit of just offering it, any interaction.  
 24 Q. And how are you trying to get them in the  
 25 habit of instructions, training, that sort of --