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1 Q. And that transition from monthly meetings
to more frequent meetings coincided with the switch
from case management to --
A. Process, yes.
Q. -- process management?
A. And how often at those meetings would you
discuss voter registration?
Q. Daily. We discussed it every time.
Q. And at the time when the office meetings
were more on a monthly schedule, how often would you
discuss voter registration?
A. Probably discuss voter registration about
every other month, depending on the numbers. If the
numbers are really, really high, then I have no
concern, but if the numbers start going down, then I
will ask -- I will avoid my line managers and ask my
staff directly what's going on.
Q. What, in your mind, would be really, really
high numbers?
A. I consider a hundred applications a month
really high.
Q. And what would you consider to be very low
and would need some corrective action?
MR. TERRY: I would object to the extent
that assumes facts not in evidence. Low numbers
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1 doesn't necessarily indicate a need for corrective
action. You can go ahead and answer the question.
THE WITNESS: I would say none, depending
on the circumstances.
Q. (By Mr. Maloney) By "none," you mean zero
applications?
A. Yes.
Q. Would any number higher than zero indicate
to you that there was a problem?
A. It might pose an inquiry, but as for any
action it may not impose an action.
Q. If you had zero, that would lead to some
action on your part?
A. That would lead to further inquiry.
Q. Okay. Would it lead to anything further
than verbal discussions?
A. It would depend on the reason.
Q. Okay. What kind of reason would lead to
more than a verbal discussion?
A. That they weren't offering -- that they
weren't offering at all without reason.
Q. Has that ever happened?
A. Not to my knowledge, no.
Q. And you mentioned earlier, displaying voter
registration posters, is that right?
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1 A. Yes.
Q. How long has that been the practice in the
office?
A. I couldn't give you an exact date. It
changed over the years. So the format of them has
changed, so I couldn't give you an exact date.
Q. Okay. And we also spoke a little bit
earlier about the computer system that's in use in
the office. Have you ever requested a change be made
to that computer system for any reason?
A. No.
Q. Are you aware of any other county directors
requesting that there be a change to that system at
all?
A. I can't say request a change. There's a
lot because of its age, and it's -- there's a lot
involved in getting a change to occur. I would say
that I have -- I don't know if you want to call it
suggested different things for the system. Whether
or not it's able to do that, I -- because I don't
know everything about computers, really, I can't say.
So I made suggestions and/or made
complaints about it, but as to submitting and saying,
we absolutely need this change, no. I make those
suggestions up to my regional office manager who
Q. Can you recall any changes ever being made
to the actual computer system?
A. I can't recall at this time. I'm sure
there have, but I can't recall at this time.
Q. Okay. Have you ever had any interaction
with the Secretary of State's office at all?
A. Not that I can recall, no. Me personally?
Q. Yes.
A. Not that I can recall.
Q. Have you ever had any interaction with any
of the deputy directors or directors of the Income
Support Division?
A. Not that I can recall. The only
interaction that I ever had with the Secretary's
Office -- I take that back -- was because of -- in
San Juan County, I do a lot of outreach, both to
individuals in the county itself, and to the
individuals in the county that are on the Navajo
reservation.
And I was asked to go to a meeting in
Zuni -- no, no, Acoma, in regards to Medicaid. And
that was the only time that I -- and that was with
Pamela Hyde, but other than that, no. I had to do
with Medicaid outreach on Indian reservations.
Q. Has a deputy director or director ever
visited the office here?
A. Yes. As to when the last time was, I can't
say. I don't record those.
Q. Was it while you were at the office,
though?
A. Yeah, I have had a number of them. Katie
Falls has been here.
Q. And what's her position?
A. Katie Falls is now the secretary.
Q. The secretary of the Income Support
Division?
A. Yes.
Q. Okay. And what was the reason for their
visits?
A. They just actually just -- they come out
from time to time to time to time just to see if
we're still here. Fred Sandoval came out right after
he was hired, and he wanted to meet the entire staff
out in the field. Instead of bringing everyone in,
he wanted to see them, you know, in their home
communities.
Q. Did they conduct any kind of review while
they were here, or was it more of a personal
meet-and-greet visit?
A. Mostly it's meet-and-greet. Katie Falls,

Q. And, what was the nature of her review?
A. Well, it's just to make sure -- we're
actually co-located in federal buildings, and she
was -- just wanted to make sure that the information
that we have in regards to clients was safe from
other individuals in the building, and that we were
sole and separate, and that the clients were able to
access services with being somewhat confidential.
Q. Did any of those visits ever involve voter
registration in any way?
A. Not that I can recall.
Q. And other than your annual performance
review that we discussed, and the Quality Assessment
Bureau's review of the office every two years, is
there any other review of the offices or your work
that happens?
A. There is an ME audit on the EBT.
Q. Could you --
A. There is an ME audit on electronic benefit
transfer. That's the only one that pops into mind.

We do actually carry a small card stock of SNAP EBT
cards, electronic data transfer cards, in the office,
and can upon emergency issue those cards to an
applicant and may or may not have a mailing address
or have other mailing issues, we can issue it from
here instead of JPMorgan issuing it.
So we have to keep very good records of
who, when and why, and the date and time it was
disseminated out, and what the card stock is. That
report is -- actually, we have to prepare a report
quarterly, but there's ME annually on that as well.
Q. And when you say "ME" you mean management
evaluation?
A. Correct.
Q. Is there any other kind of review beyond
that?
A. Other than the quality control records that
go in and out of the record on a case on a monthly
basis, but they're looking for accuracy of benefits
issued and timeliness for the federal reports.
Those records are pulled from us on a
monthly basis for the PC month, and pulled at random
actually. They have been pulled to quality control,
quality control then reviews the records for its
accuracy and everything in the record, and then
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1. returns the record.
2. Q. And do you get a report of that review?
3. A. Yes, I do.
4. Q. Does that review include voter registration at all?
5. A. Not that I recall.
6. Q. I think maybe take another five-minute break. Is that okay? I think we're getting close to wrapping up.
7. (Recess was taken from 11:53 a.m. to 12:01 p.m.)
8. Q. (By Mr. Maloney) Would you say that voter registration is of particular interest to the employees in this office?
10. MR. MALONEY: He can answer, though, right?
11. MR. TERRY: Yes, he can go ahead and speculate.
12. THE WITNESS: I believe any part of the job is of particular interest to the individuals, especially with an 11 percent unemployment rate. So I believe everybody is interested in their job, yes. I believe these people -- the people that work for me are here because of the individuals they are serving. I would venture I would say that if you weren't interested in serving individuals, you wouldn't be in this job. This is a very difficult, stressful, overwhelming position like you have never seen in your life. I mean, you just remain 98 percent timely on every action, and 95 percent correct, and never lower than those figures. That's incredibly stressful. The number of people that you have to see on any given day is incredibly stressful. The number of times you are told off per day is unfathomable.
13. If those individuals weren't interested in serving people, they wouldn't be here. So do I think that they -- my personal opinion is that, yes, they are very interested in making sure that these individuals receive anything and everything, including voter registration, yes.
14. Q. (By Mr. Maloney) Does the office, or do you set any particular goals for this office as far as offering voter registration?
15. A. You know, I have tried that. I tried setting goals, it -- I can't say that once I did that that was the best thing that I did was because when the workers fell short of that goal, there was some sense of failure, and that -- believe me, in this job, you don't need any more sense of that than you already have.

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1. So, I don't think that was -- I think we should celebrate the numbers that we get, and not the failures that we didn't get. So I stopped doing that, actually.
2. (Exhibit 4 marked.)
3. Q. So I'm handing you what's been marked as Exhibit 4. Are you familiar with that document?
5. Q. And what is that document?
6. A. This is the Excel spreadsheet that is distributed, that we actually turn into Rachel within around the first day of every month, and then she composes the figures for the entire state, and then returns them to us. This is the voter registrations that occurred per county office and per region across the state.
7. Q. And do you have eight pages there?
8. A. Yes.
9. Q. And those pages show the voter registration numbers from -- on the first page, November '04 to December '05; is that right?
10. A. I have -- yeah, November '04 to December of '09, correct.
11. Q. For each of those pages? For all of those pages total; is that right?
anybody, like, they can register anybody.

Q. And we had talked about earlier how the
benefit applications at one point did not include the
decalination language, that that was a separate form,
but now, by and large, those forms include that
language, is that right?
A. Correct.
Q. In your opinion, has the incorporation of
that decalination language into those applications
made a difference in the voter registration numbers?
MR. TERRY: I would object, it's a fact
witness.

Q. (By Mr. Maloney) In your experience, has
the incorporation of the decalination language into
those benefit applications made a difference in the
voter registration numbers?
A. As far as my opinion, my opinion says that
it's more what's happening in the political playing
field than what's on the application. I mean, when
you have President Obama running, and the First Woman
that's ever going -- going to run also. We have an
African American man and a woman that have the best
chance ever, of course, everybody's going to want to
be part of history. What's happening in the playing
field? What's happening in Arizona right now?

process model, even the process model, this is not --
this no longer becomes true. The clerical staff
become the front lines. They see, by and large, more
clients than anybody else, more than the caseworkers
do, because the caseworkers normally wouldn't see the
people, they wouldn't see the change reports, they
wouldn't see the people that are just here to pick up
an application, they wouldn't see the people that
come in just for the Medicaid, they wouldn't see
those people, but the clerks do.

Q. So in your experience, the clerks making a
verbal "ask" about voter registration made a big
difference in the number of voter registrations that
were handed out and completed?
A. In my opinion, yes.
Q. Is there anything else in your experience
that you think would have an effect on -- a
beneficial effect on voter registration results?
MR. TERRY: I object. It calls for a
narrative. You can ask him specific questions, and
he can give you answers.
Q. (By Mr. Maloney) Okay. Are there any
procedural changes that, in your experience, would
improve voter registration results?
A. Not that I can think of.