

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

NORTH CAROLINA STATE CONFERENCE )  
OF THE NAACP, )  
et al., )

Plaintiffs, )

vs. )

1:13-CV-658

Case No:

PATRICK LLOYD MCCRORY, in his )  
official capacity as the )  
Governor of North Carolina, )  
et al., )

Defendants. )

LEAGUE OF WOMEN VOTERS OF )  
NORTH CAROLINA, et al., )

Plaintiffs, )

vs. )

1:13-CV-660

Case No:

THE STATE OF NORTH CAROLINA, )  
et al., )

Defendants. )

UNITED STATES OF AMERICA, )

Plaintiff, )

vs. )

1:13-CV-861

Case No:

THE STATE OF NORTH CAROLINA, )  
et al., )

Defendants. )

VIDEOTAPED DEPOSITION  
OF  
TRACY BUCHOLTZ

1 VIDEOTAPED DEPOSITION  
2 OF  
3 TRACY BUCHOLTZ  
4

---

5 10:10 A.M.

6 WEDNESDAY, MAY 20, 2015  
7

---

8 OGLETREE DEAKINS NASH SMOAK & STEWART  
9 4208 SIX FORKS ROAD  
10 SUITE 1100  
11 RALEIGH, NORTH CAROLINA  
12  
13  
14  
15  
16

17 By: Denise Myers Byrd, CSR 8340, RPR, CLR 102409-02  
18  
19  
20  
21  
22  
23  
24  
25

1 Q. And how long have you been employed at the  
2 North Carolina Department of Transportation?

3 A. 19 years.

4 Q. 19 years. Now, have you -- what's your current  
5 title?

6 A. My current title is supervisor of the field  
7 services help desk.

8 Q. And how long have you had that position?

9 A. Since 2012.

10 Q. Now, I guess you've had other positions before  
11 that. It was such a long tenure there at the  
12 DOT. Now, first, that field services help desk  
13 supervisor position, is that with the DMV?

14 A. Yes, ma'am, it sure is.

15 Q. And have you had other positions within DMV and  
16 DOT?

17 A. Yes, ma'am.

18 Q. Okay. Could you tell me what those were.

19 A. Yes, ma'am. I started my career as a temporary  
20 employee. At that time it would be what we  
21 call today the facilitator role. I worked the  
22 lines and took photographs for those applying  
23 for a driver's license and ID card.

24 And then in 1995, I was a driver's  
25 license examiner, so I actually issued driver's

1 licenses and ID cards.

2 And in 2004, I became a training

3 officer for the driver's license section and

4 then left that position for my current one.

5 Q. And that's the field services --

6 A. Help desk, yes, ma'am.

7 Q. And that was in 2012?

8 A. Yes, ma'am.

9 Q. And what year did you start as a temporary

10 employee? I must have missed that. I'm sorry.

11 A. 1995. It's '95.

12 Q. And is there a difference between the examiner

13 role that you started and the temporary

14 employee as a facilitator role?

15 A. Yes, ma'am. A facilitator does not issue a

16 driver's license. We conduct interviews with

17 the actual customer to make sure they have the

18 proper identification, find out what their

19 needs were, but you do not actually go through

20 the SADLS process to actually issue the license

21 at that time as a facilitator.

22 Q. Okay. So if you started -- so when you started

23 as a facilitator and you moved onto an examiner

24 position?

25 A. Yes, ma'am.

1 Q. Did you apply for that position when it became  
2 available?

3 A. Yes, ma'am, I sure did.

4 Q. Okay. And then when did you take over as an  
5 examiner who interacted with SADLS?

6 A. 1997.

7 Q. 1997.

8 A. Yes, ma'am.

9 Q. So you started in 1995 and you became an  
10 examiner in 1997; is that correct?

11 A. Yes.

12 Q. And from 1997 to about 2004 you were an  
13 examiner, then you became a training officer in  
14 2004.

15 Now, what were your responsibilities as  
16 a training officer?

17 A. I conducted the driver's license basic  
18 examiners school. So all the new hires are  
19 required to go through -- at that point it was  
20 an eight-week training to learn their -- their  
21 current positions, and I also help with the  
22 roll out of the essential issuance program.

23 Q. Okay. So let's break that into two parts.

24 A. Yes.

25 Q. The basic examiner school. Now, how often did

1       you serve as a training officer for the basic  
2       examiners school? Correct me if I said that  
3       wrong.

4       A. No. We would conduct anywhere from four to six  
5       schools a year so -- and there -- like I said,  
6       an eight-week period, and you do that all  
7       year-round.

8       Q. Now, was that school -- that basic examiners  
9       school just for new examiners or was it for  
10      people who have been an examiner for 25 years?

11      A. New examiners.

12      Q. New examiners?

13      A. Yes, ma'am.

14      Q. Okay. Was there a certain size of the class  
15      before you would have one of those schools --  
16      basic examiner school sessions?

17      A. Back then the turnover rate was pretty  
18      consistent. We typically had 18 students in  
19      each one of our classrooms. I believe the  
20      smallest class that we held was 10.

21      Q. And you said "back then." What period are you  
22      talking about?

23      A. From 2004 to 2012.

24      Q. Okay. And then you also mentioned something  
25      about central issuance.

1 A. Yes, ma'am.

2 Q. What is that?

3 A. Central issuance, before 2007 you were

4 actually -- when you applied for your license

5 and ID card, we handed you the actual

6 credential so you would walk out with the

7 actual driver's license or ID card in hand.

8 Central issuance changed that process

9 and now you go through a back-end verification

10 and the card is mailed through a central

11 location and you receive it in the mail.

12 Q. Okay. And back in 2007 when you would receive  
13 that credential the same day, did it have a  
14 photo on it?

15 A. Yes, ma'am.

16 Q. Okay. A couple more questions about these  
17 different positions.

18 A. Yes, ma'am.

19 Q. And I'm going to do the ones you did before and  
20 then I'll ask you about the one you have right  
21 now.

22 A. Okay.

23 Q. As a training officer, who did you report to?

24 A. I reported to the assistant director, Wil  
25 Williamson, and his title was assistant

1 made in the SADLS system to accommodate the  
2 issuance of a voter ID.

3 So the Change Request system is the  
4 very, very high level overview and the why we  
5 have to make these changes, which is why you  
6 see the documents attached to the exhibit.

7 Q. Okay.

8 A. So we write in the description of the  
9 request -- as you see, we're letting them know  
10 as of House Bill 589, we need to make the  
11 attached changes to the actual SADLS system.

12 So we're saying the first part is you  
13 would have to look at the House Bill 589 Part 3  
14 and read that and then you would also have to  
15 look at Part 12 to read that change that would  
16 need to be made in the SADLS system. So it's a  
17 very high, high level of why we are asking for  
18 SADLS to be changed.

19 Q. Okay. And I handed you a document that's been  
20 marked Exhibit 500. Are you familiar with this  
21 document?

22 A. Yes, ma'am.

23 Q. What is it?

24 A. This is the actual RDD.

25 Q. This is the RDD?



1 A. This is the actual RDD, and in here you will  
2 find the technical requirements on how to  
3 change SADLS. You also see how the logic in  
4 SADLS will appear, the screens will appear, and  
5 you will also provide a flow, so to speak, for  
6 the examiners that they will follow through.

7 So it's a very technical for the  
8 technical side of the business. It tells them  
9 what tables need to be changed, what screens  
10 need to be changed, what programs need to be  
11 changed in the actual SADLS system, which is  
12 well above my comprehension, and it also let's  
13 the business know exactly how they plan on  
14 implementing those particular changes.

15 Q. So is it fair to say that Exhibit 500, the  
16 RDD -- and it has the title CR3125, Phase 2,  
17 Change of Scope II through VI, Technology  
18 Solution Requirements Document dated May 21,  
19 2014, Version 5 -- that this document  
20 represents the communications between the  
21 business and the technical side at DMV for  
22 implementing the Change Request regarding  
23 HB 589?

24 A. Yes, ma'am.

25 Q. Okay. And this date, May 21, 2014, Version 5,

1 are you aware of any later versions of this

2 document?

3 A. No.

4 Q. Okay. Also this RDD which -- I'm going to call

5 it CR3125. Is that okay?

6 A. Yes, ma'am, that's fine.

7 Q. This CR3125, have there been other CRs related

8 to HB 589 that are not included in CR3125?

9 A. Not to my recollection.

10 Q. Okay. And just to make the record clear, this

11 document is Bates-stamped DOT 12262 to 12340.

12 Okay.

13 Is it fair to say that this document

14 would include everything in the flow -- strike

15 that.

16 Is it fair to say that this document

17 incorporates all of the changes to SADLS for

18 implementing HB 589?

19 A. Yes.

20 Q. Okay. Can you turn to page 12273, and I'd like

21 to draw -- let me know when you get there.

22 A. Yes.

23 Q. And I'd like to draw your attention just to the

24 Section 2.2. There's the second role -- I'm

25 sorry -- the second row under the column Role

1 moving as what they should behind the scenes  
2 because it's all done electronically. So if  
3 another state has a problem or needs  
4 clarification on a record, they do contact the  
5 help desk and we answer those calls to  
6 investigate, research and find out what the  
7 problem is.

8 We also take calls from local law  
9 enforcement. If they have an individual pulled  
10 over on the side of the road and need some  
11 clarification about their driving record, it is  
12 our number that they -- they call.

13 Any user of SADLS that has access into  
14 SADLS, if they've got a password, if they are  
15 revoked in SADLS, we do the reset of passwords.

16 And then printer, if they need to print  
17 networking and there's an issue, they would  
18 call us and we will reset their printer or  
19 assign them a network printer number.

20 Q. Okay. And when you were describing the PDPS  
21 and the CDLIS, which is C-D-L-I-S systems, you  
22 talked about the pointer being a good thing and  
23 a bad thing. Can you explain that for me?

24 A. Yes. With the PDPS system, that means I have a  
25 problem in another state, so I have a

1 suspension in that state, for example a DWI and  
2 I am under suspension for that DWI. Some  
3 drivers are unaware that that suspension will  
4 enable -- not allow them to get a license in  
5 another state. So what they will do is since  
6 we're here in North Carolina, I'll go to  
7 Virginia and I'll try to apply for my license  
8 even though I'm under suspension in the State  
9 of North Carolina. When they go in to apply  
10 for that license in Virginia, Virginia is  
11 notified that the State of North Carolina is  
12 stating that they're not eligible to get a  
13 license, they must clear that problem in that  
14 state before they're able to get a license.

15 So the NDR to me -- or excuse me, the  
16 PDPS system is I'm a problem driver, I have  
17 some type of issue that I need to take care of.  
18 With the CDLIS system, CDLIS, by federal law, I  
19 am required to have that pointer. So if I have  
20 that type of license, I have to have a pointer  
21 that points to me and the state of record that  
22 I am in.

23 Q. And for that PDPS system, you gave the example  
24 of someone who had a suspension in  
25 North Carolina moving to Virginia. Does it

1 work the other way, if you had a suspension in

2 Virginia and you moved to North Carolina?

3 A. Yes, ma'am.

4 Q. How does it work?

5 A. We are notified through the PDPS system that --

6 it gives us the state and it gives you -- us

7 the last issuance information, and in the

8 corner it gives us a status, and in order for

9 you to be issued a license in any of the 50

10 states, that has to either read that you are

11 eligible or you are licensed in that state in

12 order to receive an issuance.

13 Q. And when you say issuance, you're talking about

14 the issuance of a driver's license?

15 A. Yes, ma'am.

16 Q. Now, does that -- so I'm going to give an

17 example. Say I am a person who had some type

18 of problem, a suspension in Virginia. I move

19 to North Carolina and I come to the DMV. When

20 does that pointer between Virginia and

21 North Carolina occur? Is it at the point when

22 I apply for my driver's license in the driver's

23 license office or some other later point?

24 A. It applies during the application process.

25 Q. And then what would happen, what would the

1 examiner tell me if that happened?

2 A. Well, the examiner would inform you that you  
3 have a suspension in another state that has to  
4 be cleared before you are eligible to get your  
5 license in this state and, however, we want to  
6 do as much for you as possible while you're  
7 here with us, so if you'd like to go ahead and  
8 take the written test so you do not have to do  
9 that when you come back, we would allow you to  
10 do that, if you would like to have your vision  
11 checked, we would be glad to do that for you  
12 and we would also let you know that your test  
13 scores are good for 90 days, so you would have  
14 90 days in order to clear up that particular  
15 suspension and your test scores still be valid  
16 test scores.

17 Q. Okay. So if I came into a driver's license  
18 office from a different -- and I had a pointer  
19 from a different state, I could complete some  
20 of the steps necessary to get a license, but I  
21 would not be able to get that license until I  
22 cleared up that suspension or that problem in  
23 the other state; is that right?

24 A. That is correct statement, yes, ma'am.

25 Q. And I would have 90 days before I would have to

1       retake all of the things I might take care of  
2       that first time I came to the North Carolina  
3       driver's license office?

4       A. Yes, ma'am.

5       Q. Okay. And do you know -- just, you know, do  
6       you know if the things necessary to clear up a  
7       be pointer, is it a fine or do you have to go  
8       back and appear for a hearing in the other  
9       state? Is there anything that frequently comes  
10      up?

11      A. It can be anything. It could be that you still  
12      owed that DMV restoration, it could be that you  
13      owed the court system still for the particular  
14      fine, it could be that you're actually on  
15      suspension so you have to wait until the time  
16      is up before you're eligible to get a license.

17                So all the numerous types of reasons  
18      that somebody could be suspended or in that  
19      problem pointer can be numerous, which is why  
20      we would speak to those states and talk back  
21      and forth and find out and research records.

22      Q. Now, that part, the researching records and  
23      kind of telling the person who's there what  
24      they need to do, does that happen instantly  
25      when I'm standing there or is that a follow-up

1           this check and it has to be from  
2           North Carolina. We would be able to issue you  
3           that ID card because it is not a driving  
4           privilege. This particular pointer system only  
5           stops us from actually issuing a driving  
6           privilege.

7           Q. Okay. So if I'm standing there in front of the  
8           examiner and this happens where I come back  
9           with this pointer check and it was -- it was a  
10          problem in another state and I cannot get a  
11          driver's license that day, I have a choice to  
12          do part of the test or come back and do it all  
13          in one shot --

14          A. Uh-huh.

15          Q. -- is that correct?

16          A. Yes.

17          Q. And if I request at that moment and say I  
18          really need ID, then that's when I'll learn  
19          about the photo ID that's not for operating a  
20          motor vehicle, that that's an option on that  
21          day too?

22                       MR. FARR: Objection to the form.

23                       THE WITNESS: Yes, ma'am.

24           BY MS. GARRETT:

25           Q. Let me just restate it one more time.



1                   On that day when I'm there getting --  
2           to get the driver's license, will an examiner  
3           offer the non-driver's license ID if I don't  
4           ask for it?

5           A.  When we initiate the application in the  
6           beginning, when you sit down in front of us,  
7           hey, how are you, what can I help you with  
8           today, if your goal at that time is a driver's  
9           license, then that's how we're going to proceed  
10          with the questioning.

11                   If, again, this pointer system does  
12          arrive and you've got an issue in another state  
13          and you tell the examiner, I really, really  
14          need something today, then our line of  
15          questioning would be, okay, I can't issue a  
16          driving privilege, but are you wanting an ID  
17          card.  Please keep in mind with an ID card  
18          you're not eligible to operate a motor vehicle  
19          with this, and then it -- again, it would be  
20          their decision on how they wanted to proceed.

21          Q.  And so if I come into the driver's license  
22          with -- office with the goal of getting a  
23          driver's license but I never say, oh, I really  
24          want to get an ID instead, the application was  
25          for a driver's license and then the transaction

1 would end; is that right?

2 A. I would say the transaction would end with the  
3 driver services, yes.

4 Q. Okay. Thank you.

5 A. You're welcome.

6 Q. So I wanted to know a little bit more about how  
7 SADLS guides examiners as they interact with a  
8 customer.

9 Now, am I explaining that right, does  
10 SADLS guide examiners or is it the other way  
11 around? Can you just tell me how SADLS and  
12 examiners interact with each other or how  
13 examiners, who are human beings, interacts with  
14 SADLS, which is the computer system.

15 A. Yeah. It starts with, of course, the examiner  
16 and the customer, hey, how are you, what would  
17 you like today, and based on how you respond to  
18 that, the very first screen that I see in SADLS  
19 would then drive the work flow.

20 If you're there for an ID card, there's  
21 a certain set of screens and a certain set of  
22 requirements that are going to be mandated. If  
23 you're there for a driver's license, there are  
24 additional screens that are involved in that  
25 particular type of transaction.

1 would definitely have to refer that to my IT  
2 team with where it is at.

3 Q. Okay. So -- so you don't know what that check  
4 of customer's history -- after checking  
5 customer's history, where that happens?

6 A. Correct, as it relates to the SBOE data.

7 Q. Can SADLS begin this process of checking the  
8 SBOE data if a person has a driver's license in  
9 SADLS?

10 A. If I have a driver's license in SADLS, the way  
11 that SADLS was designed, you sit at my desk and  
12 I say, I would like a voter ID, what I do is I  
13 again start the application for an ID card and  
14 it will ask me a question, is this a voter ID?  
15 If I respond to that as yes, it will go through  
16 the system and check to see if I hold a valid  
17 credential.

18 If I hold a valid driver's license,  
19 then, of course, I would have to, as an  
20 examiner, explain to the customer that that  
21 driver's license can be used for voter  
22 registration purposes and if you would like to  
23 continue with this process, you're only allowed  
24 to have one valid credential in your possession  
25 at one time.

1           So, ma'am, sir, at this point you do  
2           have a valid driver's license. If you would  
3           like me to continue with the application for a  
4           voter ID, you would have to surrender your  
5           driving privilege to receive an ID card.

6           I leave it to the customer to make the  
7           decision at this point whether they would like  
8           to surrender their driving privilege to receive  
9           the voter ID or use the current privilege that  
10          they have knowing that that could also be used  
11          for voting purposes.

12         Q. And just to clarify, earlier I think you may  
13          have said the driver's license could be used  
14          for voter registration. Is that what you  
15          intended to say or was it a driver's license  
16          for voting?

17         A. For voting.

18         Q. Okay. So you mentioned that there can only be  
19          one valid credential at a time, is that  
20          correct, in SADLS?

21         A. As it relates to a driver's license and ID  
22          card. I may have multiple credentials for  
23          driving, and what I mean by that is if I am a  
24          regular C holder and I am learning to operate a  
25          motorcycle, I could have my regular license and

1 give you your driver's license points and your  
2 driver's license status. We now switched to a  
3 new vendor in which the driver's license status  
4 was taken out momentarily because of some  
5 concerns with PII data and what the vendor was  
6 storing. Those issues have been resolved and  
7 driver's license status hopefully will be  
8 coming around the corner very, very soon. I  
9 think we are scheduled to implement that back  
10 on March 26 or 28.

11 Q. March?

12 A. I mean, excuse me, May. We're in May. Yeah.

13 May, May 28 roughly.

14 Q. Okay. Is it possible -- if you come into DMV  
15 and you start an application but you don't  
16 finish the application like you start it, you  
17 begin but something happens in the middle of  
18 the application, what happens?

19 A. It depends on where in SADLS the application  
20 stops. In order for that number that I assign  
21 to you -- if I'm a new customer, in order for  
22 that number to be assigned to you, I must enter  
23 your demographic data and hit enter to get that  
24 information stored. If I do not get to that  
25 point, that number is purged.

1 Q. Okay. So if a person comes into the DMV and  
2 they get their ticket in QFlow and they begin  
3 the application process and they have a  
4 customer number and they don't get past enter  
5 after the demographic data, is everything  
6 related to that customer number purged in  
7 SADLS?

8 A. Yes, ma'am.

9 Q. Including the QFlow ticket?

10 A. Yes, ma'am.

11 Q. When you come into the DMV office to get photo  
12 identification, at what point do they as the  
13 examiner ask the customer for the demographic  
14 data?

15 A. The examiner would start by, hey, how are you  
16 doing, what are you here for, can I see your  
17 documentation. So at that point there's some  
18 conversation taking place as to whether or not  
19 they have what is needed to proceed forward.

20 I would begin by also asking you have  
21 you ever had anything issued in the State of  
22 North Carolina before, have you not had  
23 anything in the State of North Carolina before.  
24 So there's a little mini conversation going on  
25 before the examiner enters anything into SADLS.

1 an examiner to actually get to the point to  
2 where it won't be purged, I usually have  
3 accidentally hit -- assigned a customer number  
4 and I didn't mean to hit that button and that's  
5 why we purge those records.

6 Usually by this point I know whether or  
7 not you have a record in SADLS, I know whether  
8 you're going to continue in SADLS, and our goal  
9 is at that point to get you past 102 with your  
10 name and your address and hit enter so I can  
11 put comments on the record as to why I'm not  
12 going to continue forward.

13 Q. Can you say that last part again, past 102.

14 A. 102 is the demographic screen. I'm sorry.

15 Yes. I'm so sorry.

16 Q. Before you actually hit enter on the  
17 demographic screen 102 --

18 A. Yes.

19 Q. -- there's basically -- let me know if I get  
20 this wrong -- documentation is reviewed,  
21 there's a name search, there's research, the  
22 customer number is assigned and the demographic  
23 data is entered; is that correct?

24 A. On a new customer, that is correct.

25 Q. On a new customer?

1 A. Yes, the number is assigned only for a new  
2 customer. If I'm an existing customer, I pull  
3 that record that's already attached to that  
4 customer number.

5 Q. Okay. And so if there's some point before  
6 getting to 102 where the examiner determines  
7 that one of the steps, the name search or  
8 the -- something is not sufficient to actually  
9 go forward with the application, then at the  
10 end of the day that application would be  
11 deleted or purged?

12 A. Purged.

13 Q. Okay, purged. Okay. So let me go back to  
14 QFlow --

15 A. Okay.

16 Q. -- one more time.

17 A. Yes, ma'am.

18 Q. So now you went to the DMV office, you  
19 waited -- no, you got your QFlow ticket?

20 A. Uh-huh.

21 Q. You -- QFlow is now recording -- I'm going to  
22 ask you a question.

23 A. Yes.

24 Q. At that point when you got that QFlow ticket  
25 that very first moment, did QFlow start to



1 back of the queue for other people who are  
2 waiting for that particular examiner?

3 A. I am not sure on that. I would have to refer  
4 that question to Rena Henry. She was the  
5 project manager.

6 Now that the project is coming to a  
7 close, that information will now be relayed to  
8 me so I can continue moving forward with it,  
9 but Rena Henry initially would have set up the  
10 queues, the priority, as I'm going to call it,  
11 of the tickets.

12 Q. Okay. Now, for those offices that continue to  
13 have a single camera, before the QFlow system,  
14 how were people assigned -- ordered in priority  
15 in that line -- in that queue to take the  
16 photograph?

17 A. Okay. Now, before QFlow, not every office had  
18 a queuing system. Some it was just first come,  
19 first serve. You stood in the line and that's  
20 how you were serviced.

21 For those that had a NEMO-Q, based on  
22 what we call quick transactions, you would get  
23 what I call -- and what everybody else in the  
24 DMV business call an A ticket, and to us an A  
25 ticket means a quick transaction, a renewal, an

1 ID card. I forget what B tickets were, but  
2 they were A through E and it was based on the  
3 transitional type of service that you were  
4 wanting, if you were there for a written test  
5 or reinstatement of a license, a medical,  
6 motorcycle road test, just a regular road test,  
7 that's what the ticket number you would be  
8 given. It would be like A001, B001 depicting  
9 on the type of service, but again not all  
10 offices had a NEMO-Q.

11 Q. So for those that had a NEMO-Q, there were like  
12 different categories of services. You went  
13 into that category based upon the type of visit  
14 that you had that day, whether it was a quick  
15 transaction or longer transaction?

16 A. Yes, ma'am.

17 Q. For those offices that had NEMO-Q, there was  
18 the NEMO-Q system which put you through the  
19 line?

20 A. Yes.

21 Q. For those -- and no matter what, everyone who  
22 was seeking a photo identification card had to  
23 go to the camera line; is that correct?

24 A. Everybody goes to the camera. That is the end  
25 of the process is the camera line.

1           examiner. I'm not sure how often they're  
2           presented to the examiner, but the exception  
3           list was designed with the examiners and what  
4           documentation was provided to them so that's  
5           how the list was derived.

6       BY MS. GARRETT:

7       Q. That list that we're referring to, Documents 1  
8           through 21, Page 18 of 221, is this  
9           something -- are these documents documents that  
10           can be presented for any type of ID card that  
11           DMV issues or just voter ID?

12       A. I would refer that question to Charlotte  
13           Boyd-Malette. She would be the best person to  
14           answer that question.

15       Q. When you were an examiner, could you accept  
16           documents that were not publicly identified as  
17           accepted documents for issuing either photo  
18           identification or driver's licenses?

19       A. Not without the approval of my senior examiner.

20       Q. Now, for Exhibit 221, you mentioned earlier  
21           that it has been used for training to inform  
22           you as you were training examiners.

23       A. Yes. Yes. I wanted to make sure I had the  
24           right document.

25       Q. What is taught about the information on Page 18

1 were something altered on the documents,  
2 license and theft took the documents, they  
3 reviewed the documents, the customer swore up  
4 and down those are my documents, they are  
5 correct, license and theft did their  
6 investigation and they did find the documents  
7 to be acceptable, true, valid documents, in  
8 which case I noted it in SADLS that the  
9 documents were reviewed by license and theft,  
10 the law enforcement side, they were deemed to  
11 be acceptable and therefore I issued based on  
12 that assumption.

13 Q. So the determination about the authenticity of  
14 a document is initially made by an examiner; is  
15 that correct?

16 A. That is correct.

17 Q. And their determination whether correct or  
18 incorrect can impact the issuance of a license;  
19 is that correct?

20 A. Yes.

21 Q. And why don't we move on for one second. I  
22 just want to talk a little bit about another  
23 DCR.

24 MS. GARRETT: Let's take a break so you  
25 can have a moment to go off the record.

1 Control Request was, and you held up  
2 Exhibit 477, and you would also get whatever  
3 the results were of that Data Control Request?

4 A. Yes.

5 Q. And here we have Exhibits 506 and Exhibit 507.

6 Do you know what these documents are?

7 A. They are the results of the Data Request 1009  
8 that you showed me in Exhibit 477.

9 Q. Okay. And for the record, these documents are  
10 described in their production with file names,  
11 and for Exhibit 507 with the Bates-stamped  
12 12529, the file name is DMV SADLS Report, Voter  
13 ID applications not resulting in issuance  
14 January 2014 through February 2015.

15 And for Exhibit 506, which is  
16 Bates-stamped 12488 through 12524, the file  
17 name is DMV SADLS Report, All Voter IDs issued  
18 January 2014 through February 2015.

19 Q. Now, I just want to talk to you about both --

20 MR. FARR: Can I ask a question. Where  
21 did you get that from?

22 MS. GARRETT: From the production file,  
23 there is data produced with each document  
24 describing the original file name for each  
25 document produced by DOT. So these Bates

1 stamps correspond with the description of the  
2 file name that I just read into the record, and  
3 I read it in the record for ease of all counsel  
4 when pulling the data up and for clarity of  
5 what these reports are.

6 MR. FARR: It's a report that we  
7 provided.

8 MS. GARRETT: When you produce data,  
9 you also produced descriptions of the title.

10 MR. FARR: Well, I'm glad to know that.

11 MS. RYAN: This is the metadata. The  
12 metadata that's included in the production  
13 includes the file name.

14 MR. FARR: I learn something every day.

15 BY MS. GARRETT:

16 Q. Okay. So that's what the file name is for  
17 these documents.

18 So I'd like to draw your attention to  
19 DCR1009 Report B. This is Exhibit 506.

20 First, Customer ID, what does that  
21 reference?

22 A. That is how they are identified in SADLS. It  
23 could be a DL issuance, an ID card issuance,  
24 but it is the number attached to an individual.

25 Q. Okay.

1 A. Customer number, control number, customer ID,  
2 we refer all that -- driver's license number,  
3 ID number, that is all under Cust ID.

4 Q. And because this report has the heading Issued  
5 Voter ID Cards, would the customer numbers on  
6 this report be limited to those customers who  
7 were issued ID cards?

8 A. Voter ID cards.

9 Q. Voter ID cards. Thank you for clarifying.

10 A. Yes.

11 Q. So this document is limited to customers who  
12 have numbers affiliated with the issuance of  
13 voter ID card?

14 A. During the time frame specified in the DCR,  
15 that is correct.

16 Q. And just for the record, you refer to the  
17 Exhibit 477 as the DCR connected to  
18 Exhibit 506?

19 A. Correct.

20 Q. Now, the Sex and Race columns are  
21 self-explanatory, but I wanted to ask about  
22 Form ID. What does Form ID mean?

23 A. Form of ID is in SADLS a free flowing text  
24 field, meaning that I can enter data and it's  
25 not verified, it's keystroke for keystroke that

1 I type in. And under form of ID, that would be  
2 the identification that somebody provided for  
3 the issuance, so this would be their identity  
4 documents, could be their residency documents.

5 So this is where we would have the  
6 examiners tell us what identification was  
7 presented for you to continue with your  
8 issuance process.

9 Q. Okay. And then to go to the next column, we  
10 have Residency. And what -- what does that  
11 Residency header mean for that column?

12 A. With me reviewing this, the residency,  
13 according to Exhibit 477, it was asked for them  
14 to provide the identity that was shown -- it  
15 says the documents presented to prove identity,  
16 which would be your form of ID, and  
17 North Carolina residency. So this would be the  
18 documentation, if provided, that would prove  
19 North Carolina residency.

20 Q. And again, you referred back to Exhibit 477's  
21 directive for what to produce for Exhibit 506  
22 for issued IDs; is that correct?

23 A. Yes, that's correct.

24 Q. Then I'd like to talk about the column Station  
25 ID. Could you just quickly refresh what



1 Station ID is.

2 A. Station ID is the location of the office,  
3 numeric location of the actual office. So each  
4 one of these station numbers represents an  
5 actual driver's license location. As I said  
6 before, if I am at Station 171, that could mean  
7 the West Raleigh location. So each one of  
8 these numbers is an -- actually associated with  
9 a particular site.

10 Q. Okay. Now just take a moment to look at  
11 Exhibit 506. Earlier today we talked about  
12 mobile units having Station IDs. Are any of  
13 the Station IDs here affiliated and -- with a  
14 mobile unit?

15 A. Without having the Station ID list to actually  
16 tell me the office location, to breeze through  
17 it looking at the -- just looking and not  
18 knowing what site the mobile unit visited,  
19 which site -- with 117 offices, I can't  
20 remember exactly what number corresponds with  
21 each office, but if it is a pool of data -- of  
22 data from January of 2014 to, what was it,  
23 March because it was current, to March 2015,  
24 then I would assume that some of these offices  
25 on this particular sheet were a mobile unit

1 available. Again, without looking at the  
2 record, I'm speculating on what took place.  
3 I'm sorry.

4 Q. Okay. Let's move on to Exhibit 507. This is  
5 the one page. This is DCR1009 Report C with  
6 the heading Application Only Voter ID Cards  
7 with the Bates Number 12529.

8 MR. FARR: 507.

9 MS. GARRETT: 507.

10 MR. FARR: This is the not issued list?

11 MS. GARRETT: This is the application  
12 only.

13 MR. FARR: Okay. Is this application  
14 only or not issued?

15 MS. GARRETT: Let me ask the witness.

16 BY MS. GARRETT:

17 Q. If it's application only, does that mean that  
18 the voter ID did not issue?

19 A. It was an application only, there is no  
20 issuance tied to that record.

21 Q. And, Tom, just --

22 A. For that day. For that request, I should say.

23 MS. GARRETT: Tom, just to refresh what

24 the file name was for 507, it was DMV SADLS

25 Report Voter ID applications not resulting in

1 issuance January 2014 through February 2015.

2 That was the --

3 MR. FARR: That's what I thought you

4 said.

5 MS. GARRETT: Okay. I'm sorry about

6 that confusion.

7 BY MS. GARRETT:

8 Q. Okay. Now, this exhibit, Exhibit 507, this

9 would include all individuals who came in to

10 seek a voter ID card and got the "enter" from

11 the examiner at Screen D 102; is that right?

12 A. That is correct.

13 Q. Okay. And so in this Exhibit 507, the

14 examiner's concluded that there was enough

15 information for the application; is that right?

16 A. Yes, ma'am.

17 Q. And this list would not include individuals who

18 came in and at some point before the examiner

19 got to D 102, they determined that there wasn't

20 sufficient information for the application; is

21 that correct?

22 A. That is correct.

23 Q. Okay. So I would like to move on from that

24 exhibit. Oh, one more thing on Exhibit 507.

25 Can you go back to that.

1 Q. And then it was forwarded to the State Board of  
2 Elections who forwarded it to DMV. And so my  
3 question is: In looking at this document, does  
4 this refresh your recollection as to a  
5 circumstance like this? Do you recall issues  
6 regarding somebody complaining about  
7 registering at a DMV but then they weren't on  
8 the voter registration rolls?

9 MR. PETERS: Again, objection to the  
10 extent that your statement does not accurately  
11 reflect what the document says. The document  
12 speaks for itself.

13 MR. FARR: Tracy, you don't have to  
14 read the whole thing if you don't need to, but  
15 if you want to you can.

16 THE WITNESS: Yeah. I'm not aware of  
17 this situation, no.

18 BY MR. EPPSTEINER:

19 Q. Do you know how many voter ID cards have been  
20 issued from January 2014 until today  
21 approximately?

22 A. Approximately a thousand.

23 Q. Have you received complaints from customers who  
24 tried to get a voter ID but weren't able to do  
25 so?

1 going to necessarily say it was for a voter ID  
2 or examiner error without looking through all  
3 my notes on that particular incident.

4 Q. I'm going to show you what's going to be marked  
5 as Exhibit 509 to your deposition.

6 (WHEREUPON, Plaintiffs' Exhibit 509 was  
7 marked for identification.)

8 BY MR. EPPSTEINER:

9 Q. Can you review the document and let me know  
10 when you're finished, please.

11 A. Okay.

12 Q. Does this document refresh your recollection  
13 whether there have been customer complaints  
14 regarding customers who are charged \$10 when  
15 attempting to obtain a free voter ID?

16 A. Yes.

17 Q. And so has that happened?

18 A. Yes.

19 Q. And this is for what appears to be to -- \$10  
20 refund to Ms. Jennie Lee; is that right?

21 A. Yes, on the behalf of her son, that is correct.

22 Q. Based on this document, do you recall other  
23 circumstances where refunds of \$10 were given  
24 for someone who tried to get a free voter ID  
25 card?

1 Q. So with your experience working at the DMV and  
2 then working with outside vendors such as the  
3 Post Office, you wouldn't be surprised if  
4 something like that occurred?

5 A. Correct. Correct. I mean, that's the nature  
6 of the business.

7 Q. Are you aware of customer complaints of  
8 customers having to return to driver's license  
9 office multiple times due to the photo ID not  
10 being received in the mail?

11 A. I would have to ask you what you meant by  
12 multiple times. Are you asking about their  
13 initial visit and then us giving them the  
14 option to go online or go into an office and  
15 they choose to go into an office as a multiple  
16 visit?

17 Q. So let's say a customer goes to a driver's  
18 license office to obtain some photo ID  
19 credential and then they don't receive that  
20 credential in the mail so they have to go back  
21 to a driver's license office to reapply, has  
22 that occurred?

23 A. Yes.

24 Q. Are you aware of a circumstance where a  
25 customer has done the same thing but it's

1 happened twice, meaning the customer goes to a  
2 driver's license office, applies for a photo ID  
3 credential, it's not received in the mail, they  
4 then go back to the driver's license office,  
5 reapply, they say also it didn't come in the  
6 mail that second time and so they have to go to  
7 a driver's license office a third time. Are  
8 you aware of that happening?

9 A. I am aware of that happening, again, with the  
10 internet unit and the temporary driving license  
11 unit being under me for a period of time. We  
12 issued licenses to the military personnel and  
13 the APOs, sometimes FedEx will deliver,  
14 sometimes FedEx won't deliver, sometimes  
15 they're returned back to us. Sometimes there's  
16 a problem in the -- I don't remember what  
17 country the gentleman was at, but they said  
18 that the US mail has a tendency not to make it  
19 out of their Post Office there. So there are  
20 situations where one has been mailed multiple  
21 times, yes.

22 Q. Are you aware of customer complaints regarding  
23 the mobile unit schedule not being accurate on  
24 the DOT website?

25 A. The mobile unit and the responsibilities of the

1 mobile unit would fall under someone else, so  
2 I'm not privy to that, no.

3 In the continuing education training,  
4 nobody brought up a mobile unit, but they  
5 brought up a Newton driver's license office not  
6 having the correct hours of operation. That  
7 information has been sent to communications,  
8 communications will then contact the web team  
9 to get that changed.

10 Q. When we talked about that example where that  
11 person had to make a third trip to the driver's  
12 license office in order to apply for their  
13 photo ID credential, approximately when was  
14 that? Because I know you said you were in  
15 charge of a particular unit at one time so I'm  
16 trying to understand the approximate time of  
17 that.

18 A. I don't recall the actual months that it was,  
19 but I can tell you it has been within this  
20 year, it would have been this year.

21 Q. By within this year, you mean 2015?

22 A. Yes. Yes.

23 Q. Are you aware of issues with mobile units being  
24 out of service, meaning not working?

25 A. Define not working. Are you talking about



1 equipment in the actual mobile unit not working  
2 or the mobile unit itself, the van --

3 Q. I'm talking about for whatever reason a mobile  
4 unit wasn't able to make a planned stop, so  
5 that could be the mobile unit equipment failure  
6 itself to drive there or the equipment within  
7 the mobile unit.

8 A. I would only be familiar with the equipment  
9 aspect of it, meaning that the mobile unit got  
10 to a particular location and quite possibly the  
11 connection was down. They are wireless so they  
12 have to deal with a wireless network, so some  
13 connectivity issues could have resulted because  
14 of that wireless, sometimes the connectivity to  
15 the camera, you lose that -- talk to the  
16 cameras, sometimes you lose that talk to the  
17 network printers. So those types of issues are  
18 going to be the ones that I'm familiar with.

19 As far as it not making it to a stop,  
20 I'm not privy to it broke down somewhere.

21 Q. So you're not familiar with driving equipment  
22 issues for a mobile unit to get to a particular  
23 stop?

24 A. Correct.

25 Q. You're more familiar with equipment

1 malfunctioning within the individual unit?

2 A. That is correct.

3 Q. And what is your knowledge of that? When is  
4 the last time something like that occurred?

5 A. The mobile units went to Charlotte last  
6 Thursday and they were having some connectivity  
7 issues.

8 Q. And when you say mobile units, is that more  
9 than one?

10 A. I believe they had two mobile units out there,  
11 yes.

12 Q. And both had connectivity issues?

13 A. One -- the names weren't transmitting over to  
14 the camera. The reason the names were not  
15 transmitting to the camera, they were using the  
16 wrong node is what we call it, meaning that  
17 when I issue a license, I tell that name to go  
18 to a particular camera and they did not have  
19 that mobile unit pointed to the right node in  
20 their unit, they had it pointed to the other  
21 site that they were in before they got there.

22 So once they called us, we were able to  
23 rectify that within two or three minutes, that  
24 problem got fixed.

25 The other mobile unit had an error

1 mining customer record, which is an IT issue,  
2 it's something that I cannot help with. I  
3 don't know how long it took them to get that  
4 resolved because they did have to wait for a  
5 tech to come there and do something to the  
6 camera, but both of them got resolved.

7 Q. And in that example, when the technician had to  
8 come out to the mobile unit, does that mean  
9 that the mobile unit was out of service to  
10 provide DMV services for some period of time  
11 during the day?

12 A. They could only go to a certain point. They  
13 would not be able to actually physically issue  
14 because they did not have a camera to take a  
15 photograph. So I could get through the  
16 entering of all the data all the way up to the  
17 issuing point and then I would have to stop  
18 services and either ask you to come back, would  
19 you like to wait, what -- like make an  
20 appointment and come back and see us again.

21 And again, they were in Charlotte, the  
22 office is going to be open tomorrow, you can  
23 come on into the office. They had shut down  
24 the office to make some renovations to that  
25 particular office and sent the mobile units

1 down there.

2 Q. And is the Charlotte area one of the busier  
3 areas for customer traffic for DMV services?

4 A. Yes.

5 Q. Other than that example from Charlotte that I  
6 think you said was last week, what other  
7 examples of equipment within the mobile unit  
8 not functioning so that DMV services couldn't  
9 be provided for some time?

10 A. What I'm experiencing with the help desk is,  
11 again, every time that they move to  
12 locations -- remember I told you that Station  
13 ID changes where I'm at -- they have to  
14 remember to call us so we can point that  
15 camera, that station to the right camera.

16 If not, then we're sending it to, as I  
17 described, virtual world because I'm no longer  
18 at -- let's say I'm at Station 1 today and  
19 that's where the mobile unit went, I'm at  
20 Station 1 and I'm issuing.

21 Tomorrow morning I go to Station 2, but  
22 I don't call the help desk to let them know  
23 I've moved to Station 2. So when I log in and  
24 I start issuing, my camera's now pointed to  
25 Station 1. So the names I'm sending over to

1 Station 2, it doesn't know where to connect to.

2 So they call us, we make a quick call

3 to the programmer, she changes it and all the

4 sudden all the names that they've issued that

5 morning appear.

6 Q. And so that circumstance suspends services for

7 some period of time?

8 A. Some period of time, yes, but not usually a

9 substantial period of time.

10 Q. So other than that issue where the camera is

11 pointed at, you know, one unit site when it

12 should have been the next one the next day and

13 the other issue that we talked about where a

14 tech had to come out, what other circumstances

15 do you recall?

16 A. That's been the majority of them and the Wi-Fi,

17 like I said, connection. If Time Warner Cable

18 is having problems, then that mobile unit could

19 be experiencing problems because they're using

20 that internet, the wireless internet to conduct

21 the business. It's not hard wired in.

22 Q. So if the wireless internet is down, the -- the

23 examiners in the mobile unit can't complete the

24 DMV services?

25 A. They would have no internet connection, no

1 connectivity.

2 Q. No computers?

3 A. No nothing, yes.

4 Q. And that's happened, right?

5 A. Yes. And we're relying on, like I said, a  
6 vendor like Time Warner Cable to provide us  
7 that service.

8 Q. How many times do you recall that internet  
9 connectivity issue happening?

10 A. It happens --

11 Q. Does it happen every month?

12 A. I would say we may get a call about it maybe  
13 monthly from five mobile units. So maybe out  
14 of five mobile units, maybe one a month there's  
15 a problem with the wireless.

16 Q. Okay. So other than all of the previous issues  
17 we've discussed, do you recall any other  
18 equipment-type failures so that DMV services  
19 can't be provided within the mobile units?

20 A. That would be the main ones that services could  
21 not be provided and we're at a dead stop.

22 Q. Have there been circumstances where there were  
23 staffing issues where a particular mobile unit  
24 couldn't be staffed one day?

25 A. I'm not -- I would not know.

1 the ones that license and theft have been asked  
2 to go make a visit to their home, and it's just  
3 on an Excel spreadsheet that I keep locally on  
4 my computer.

5 Q. And does that spreadsheet indicate whether a  
6 homebound ID has actually been issued?

7 A. I do put an issue date on that Excel  
8 spreadsheet. I put the date that I requested  
9 it to, send it to license and theft and then a  
10 date that I issued, the amount of money that  
11 was collected, and if for some reason the  
12 issuance didn't take place or the inspector  
13 went to the house. And the last one that I  
14 recall, the customer was deceased so I made a  
15 notation, the reason the visit didn't happen is  
16 because he's now deceased.

17 Q. Do you know how many homebound IDs have been  
18 issued so far this year, so 2015?

19 A. I'm estimating 13.

20 Q. What about in the last two years, so  
21 January 2014 until today?

22 A. Again estimating 50.

23 Q. Have any of those been free voter ID cards?

24 A. There has not been a request for a free voter  
25 ID.

1 Q. For the homebound program?

2 A. Correct.

3 Q. If you're applying for a voter ID card, the  
4 customer says they want a voter ID card, does  
5 SADLS prompt the system for the examiner to ask  
6 if the customer is homeless or over 70 years  
7 old?

8 A. Over 70 years old, SADLS is calculating that  
9 based on the date of birth that's entered into  
10 SADLS, so the system is doing that one.

11 If you are medically cancelled and are  
12 eligible for a free ID, SADLS is calculating  
13 that one based on your status in SADLS.

14 The homeless and the legally blind  
15 individuals, there is a spot in SADLS for the  
16 examiner to notate whether you are legally  
17 blind and whether you are homeless.

18 Q. Because my question is if a customer goes to  
19 the DMV and asks for -- they say I want a free  
20 voter ID card, are they still asked by the  
21 examiner about the other types of free IDs?  
22 So, for example, if you're homeless and have a  
23 letter from a homeless shelter, are they still  
24 asked that?

25 A. That's what these training consisted of the



1 comes off my report. I'm unaware of good  
2 match, bad match, no match, we're unaware of  
3 it.

4 Q. And so if it was scanned successfully on the  
5 1st but somebody wants a physical copy of it on  
6 the 2nd of the next month, per policy, that may  
7 not be possible, right?

8 A. On the 2nd of the month, maybe not. On the 1st  
9 month day, quite possible if you get them  
10 before they shred. They're only required to  
11 keep them in the office for 30 days.

12 Q. Ms. Bucholtz, I want to show you a document  
13 that was marked yesterday as Exhibit 484.

14 So, Ms. Bucholtz, this document is an  
15 e-mail that you sent to Charlotte Boyd-Malette  
16 on January 15, 2015; is that right?

17 MR. FARR: You're looking on the first  
18 page?

19 BY MR. EPPSTEINER:

20 Q. Yes, the first page of the document.

21 I apologize. This is an e-mail that  
22 you sent to Charlotte Boyd-Malette on  
23 January 15, 2015; is that right?

24 A. That is correct.

25 Q. And if you look at Page 11 of the document, do

1       you see the bottom e-mail?

2       A. Are you talking about the one dated Monday,  
3       October 20th at 12:54?

4       Q. At 10:35 a.m.

5                   MR. FARR: It's right beneath it.

6       BY MR. EPPSTEINER:

7       Q. It's right beneath it on Page 11.

8       A. Oh, yes, sorry. Yes. There's not a line  
9       there. Yes, I see it now.

10      Q. So I'm just going to read from that e-mail  
11      starting a few lines down with "They took." So  
12      it says:

13                   "They took one of their clients to  
14      get a DMV-issued photo ID. DMV charged  
15      the person \$10 and told them the ID is  
16      not free to people who are already  
17      registered to vote. The free ID only  
18      applies to people who need it to  
19      register."

20                   And if you look at the first page of  
21      the document, you talk about wanting a few  
22      minutes to talk at the next district supervisor  
23      meeting. Was it regarding this particular  
24      circumstance?

25      A. It was regarding what they believe needed to be

1 addressed at continuing education as well.

2 Q. When you say "they" --

3 A. The district supervisor meeting. What we

4 wanted to know is at the district supervisor

5 level, what type of training do you believe the

6 field needs to help mitigate not only these

7 complaints but any complaint that you have kind

8 of out there in the field regarding. That is

9 my intent of this e-mail.

10 Q. And so based upon this complaint, did you

11 believe that further training of examiners was

12 needed?

13 A. Not just with this one complaint. To me,

14 anything that we implement we stay hot and

15 heavy on maybe for a month after it's

16 implemented and then we move on to the next

17 thing that's there.

18 When Randy -- when Randy Dishong, the

19 deputy commissioner, appointed me liaison of

20 SBOE and to also identify some problems that

21 may be in SADLS, may not be in SADLS, Tracy, we

22 really want you to look hard on this, it was

23 brought to my attention that maybe some of the

24 examiners didn't quite know, maybe some of the

25 new ones weren't being quite trained a hundred

1       percent correctly in what should go on, maybe  
2       there was a lot of miscommunication internally,  
3       so let's get everybody back on the same page  
4       and let's make sure that we're consistent with  
5       the information that we are providing statewide  
6       not only with the examiners but with the  
7       website, with SADLS, let's make sure it's all  
8       connecting.

9                   So that's what I've been tasked to do.

10       So this was probably my first outreach with,  
11       hey, district supervisors, on your level, what  
12       seems to be the issues, especially now that we  
13       know they're starting to arise.

14       Q. Do you remember your testimony regarding QFlow?

15       A. QFlow, yes.

16                   MR. EPPSTEINER: Can we go off the  
17       record for a moment.

18                   THE VIDEOGRAPHER: Off record at  
19       7:38 p.m.

20                   (Brief Recess.)

21                   THE VIDEOGRAPHER: On record at  
22       7:39 p.m.

23       BY MR. EPPSTEINER:

24       Q. And I believe the QFlow system is tracking wait  
25       times at DMV offices; is that right?

1 Q. Did you review that information in that report?

2 A. I viewed it only into the context to make sure  
3 it looked like it was all there. There's a,  
4 quote, unquote, button in QFlow that allows you  
5 to export the data automatically into an Excel  
6 spreadsheet. So I went, made sure I got the  
7 report that he was requesting, hit the Excel  
8 spreadsheet, saved it to my desktop and opened  
9 it enough to make sure that all the data that  
10 was on my screen was over on the Excel  
11 spreadsheet and then forwarded that information  
12 to Dishong.

13 Other than that, I didn't look to say,  
14 oh, you had an hour wait of appointments, oh,  
15 you had an hour wait in this particular  
16 category, no, I did not.

17 Q. Are you aware of a customer having to wait an  
18 hour before being served?

19 A. Daily basis. Daily basis.

20 Q. And what are some of the busier DMV driver's  
21 license offices in terms of wait times?

22 A. I would say your Charlotte area, your  
23 metropolitan area, Charlotte, your Raleigh  
24 area, again, metropolitan area, and what we  
25 call the Triad, the Greensboro -- Greensboro,

1 High Point, Winston-Salem type area, again a  
2 higher metropolitan-type area.

3 Q. What about university-type communities, what I  
4 mean by that is, for example -- an example  
5 would be the Carrboro driver's license office  
6 in Orange County, which is the county where UNC  
7 Chapel Hill is, do you have any knowledge about  
8 whether that office is particularly busy?

9 A. To me, they're not the busiest in -- overall  
10 when you compare the issuances to the -- to the  
11 wait times. Because, again, I'm relating it  
12 more on the issuances from that particular  
13 location is what I look at. So if you've got,  
14 like I said, the bigger locations, more  
15 examiners, more traffic coming in, you're going  
16 to be a higher volume.

17 Q. And some of those higher volume driver's  
18 license offices still have only one camera,  
19 right?

20 A. They all have only one camera at this  
21 particular point.

22 Q. Are you aware of whether the Voter Registration  
23 Application -- at one time if a voter went to a  
24 driver's license office and tried to register  
25 to vote but they didn't want to fill in the