

1 A. Correct.

2 Q. Is it possible that whoever reviewed this
3 should have awarded -- because she owns it, that whoever
4 should have just awarded her a 50 percent homestead
5 exception here?

6 A. Yeah. If he doesn't reside there, they should
7 have, yes.

8 Q. Right. And they put down that his -- another
9 address for him, so is it possible that instead of
10 getting 100 percent exception to Ms. Perez, it should
11 have been 50?

12 A. Yes.

13 Q. And that was just a mistake?

14 A. Could have been.

15 Q. Okay.

16 MR. WOOD: I don't have any further
17 questions.

18 MR. WYDE: Nothing further, and as soon as
19 we see the 2338 docs, we can basically cut him loose.
20 And I wrote down that address for him.

21 THE COURT: Okay. Thank you.

22 MR. WYDE: Thank you, Mr. Pennington, we
23 appreciate your time. May I continue with the documents
24 that have been --

25 THE COURT: You may.

1 MR. WYDE: Okay. Mistakes do happen. For
2 example, Your Honor, this is one at 2335 Knight Street
3 which -- as well as 2342 Douglas Avenue which I'm sure
4 the Court has heard from time to time, and this is care
5 of Francisco Medrano, Sr. Of course, according to
6 Ricardo Medrano, Jr., Francisco Medrano, Jr. or Sr., it
7 doesn't matter, they're both dead.

8 I think we're going to be under 4.5 with
9 the petition. This is Joe Alvarez.

10 MR. RICH: I don't know the name listed
11 under 4.5. Mr. Wyde, before we start --

12 MR. WYDE: Yeah.

13 MR. RICH: -- Your Honor --

14 THE COURT: Yes.

15 MR. RICH: -- I'm looking at page 3 of the
16 live petition, and at Mr. Wyde's suggestion under 4.5, I
17 do not see the name of the individual listed. Am I
18 reading it correct, or is it listed someplace else in
19 the petition?

20 MR. WYDE: Good question, and I'm trying to
21 find that out.

22 MR. RICH: Thank you.

23 MR. WYDE: I apologize, Judge, I miscited
24 the section. This comes under 4.12, votes cast and
25 counted by some voters who are not eligible to vote

1 including by voting in person during an early voting
2 time period and on election day. There's only one or
3 two of these that I think we've been able to locate,
4 so --

5 MR. WOOD: I'm still not seeing it.

6 MR. WYDE: His name is not listed.

7 MR. WOOD: Oh.

8 MR. WYDE: It comes under a different
9 section, 4.12. It's at the very back of page 14.

10 MR. WOOD: Okay. All right.

11 MR. WYDE: Yeah.

12 MR. WOOD: Let me get back there. 412,
13 okay.

14 MR. WYDE: Yes, sir. May I proceed?

15 THE COURT: You may.

16 MR. WYDE: Okay. Mr. Alvarez on
17 Contestant's 151 gives us an address of 9327 Rolling
18 Rock Lane, Dallas, Texas -- I'm sure there's a ZIP code
19 somewhere on this thing -- 75238-2904. The combination
20 form for early voting by personal appearance, part of
21 the election documents in this case, showing Mr. Joe
22 Adrian Alvarez voting at -- from a registration address
23 of 2319 in Dallas, 75219.

24 We'll note on the second page of 151 at
25 this point that Mr. -- excuse me, the third page, I

1 believe, Mr. Alvarez has an active homestead exception,
2 although it doesn't seem to indicate -- I don't know if
3 that 100 is -- I think that's just a light copy. I
4 could be mistaken, but it does have a check and
5 apparently has a -- I'm sorry, Mr. Wood.

6 MR. WOOD: That's all right.

7 MR. WYDE: My mistake. This is what I was
8 referring to. I'm sorry. This active, you can see Joe
9 Alvarez, 100 percent, here's the check mark, and I
10 believe up here at the top, it will give us again the
11 9327 Rolling Rock, 100 percent ownership. So I don't
12 believe Mr. Alvarez can claim his residency for voting
13 purposes on Knight Street when he, according to the
14 appraisal district, he's claimed he lives or resides
15 somewhere else.

16 And for the record, Judge, I'm going to
17 tender to Mr. Wood 151 the Court already admitted, but I
18 attached the Dallas County voting record in-person
19 voting that's part of the records in this particular
20 election. See if Mr. Wood has any objection to that.

21 MR. WOOD: I don't have any objection, but
22 there was some comments made or argument that you can't
23 vote somewhere you don't have a homestead exception, and
24 that's just not the law, so I have no objection to these
25 documents being entered. We'll argue later.

1 THE COURT: Documents are admitted.

2 MR. RICH: What exhibit number, please?

3 MR. WYDE: That was 151, and the document
4 that was attached, for lack of a better description, has
5 this long name. It wasn't a mail-in ballot, in other
6 words.

7 We'll call Veronica Medrano.

8 MR. WOOD: What list is she on?

9 MS. SEPULVEDA: I don't believe
10 individually she's -- she's under -- she would be under
11 the residency.

12 MR. WOOD: Under what?

13 MS. SEPULVEDA: Under the residency for the
14 same section.

15 MR. WYDE: I don't know if she's been
16 sworn, Your Honor.

17 THE COURT: If you'll raise your right
18 hand, please.

19 (Witness sworn)

20 THE COURT: If you will, come around here
21 and have a seat, please.

22 VERONICA MEDRANO,
23 having been first duly sworn, testified as follows:

24 DIRECT EXAMINATION

25 BY MR. WYDE:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. Would you tell us your name, please?

A. Veronica Medrano.

Q. Yes, ma'am. And how old are you?

A. 20.

Q. And where do you live, Veronica?

A. I live in Mesquite.

Q. Okay. Would that be -- is your father Frank Medrano III?

A. Yes.

Q. Okay. And is that address going to be 2408 Boardwalk Drive?

A. Yes.

Q. Where did you go to high school?

A. Horn -- Mesquite Horn.

Q. Mesquite Horn?

A. Uh-huh.

Q. Okay. And did you go all four years?

A. Yes.

Q. How long have you lived at 2408 Boardwalk Drive?

A. Since I was born.

Q. Okay. That's been your home your whole life?

A. Yes.

Q. Okay. You're familiar, to some extent, with -- or do you know your cousin, Carlos?

1 A. He's my uncle.

2 Q. Oh, your uncle, excuse me.

3 A. Yes.

4 Q. And do you know Ricardo Medrano, Jr.?

5 A. Yes.

6 Q. Okay. Is that --

7 A. I don't know how he's related. He is related.

8 Q. Right. Your -- if I understand correctly, tell
9 me if this is somewhat accurate, but basically, your dad
10 is Frank --

11 A. Yeah.

12 Q. -- Medrano III?

13 A. Uh-huh.

14 Q. And his father was Frank, Jr.?

15 A. Uh-huh.

16 Q. Who's passed away?

17 A. Yeah.

18 Q. That'd be your grandfather?

19 A. Yeah.

20 Q. And then your grandfather, he had a brother
21 named Ricardo?

22 A. Uh-huh.

23 Q. And this is Ricardo, Jr.?

24 A. Yeah.

25 Q. Okay. So Ricardo, Jr.'s kind of more along the

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

same age;

was your dad?

A.

Yes.

Q.

when he's
right?

Which is why you might refer to him as an uncle
really kind of a cousin or something; is that

A.

Yeah, something like that.

Q.

know, when
Justice (

Okay. Well, did -- were you asked to vote, you
on your Uncle Carlos was running here for the
the Peace?

A.

Yes.

Q.

election
vote early

And was that back in -- you know, I think the
was March 2nd, but you might have been asked to
the last couple of weeks in February?

A.

It was early. I don't remember when exactly.

Q.

Do you go to college?

A.

Yes.

Q.

Where do you go to college?

A.

El Centro right across the street.

Q.

You don't live there, do you?

A.

Live where?

Q.

At El Centro.

A.

No.

Q.

Do you live on Douglas?

A.

No.

Q.

Do you live on Knight Street?

1 A. No.

2 Q. Have you ever lived on Douglas or Knight
3 Street?

4 A. No.

5 Q. Okay. Did you bring a voter registration card
6 with you?

7 A. (Moving head side to side)

8 Q. No?

9 A. No.

10 Q. Are you registered to vote?

11 A. I know I'm registered at Douglas.

12 Q. Okay. And do you remember voting in person
13 over at, I don't know, Grauwylar -- or something like
14 that -- Park?

15 A. Yeah.

16 Q. Can you tell us if you lived in Mesquite how it
17 is you got roped into voting at Grauwylar?

18 A. I was asked to vote.

19 Q. Okay. And who asked you?

20 A. Carlos.

21 Q. I'm sorry?

22 A. Carlos.

23 Q. Carlos Medrano?

24 A. Uh-huh.

25 Q. The one running for JP?

1 A. Yeah.

2 Q. What did he say to you?

3 A. He came to me and he said, can you change your
4 address so you can vote for me in the election?

5 Q. Okay. And did he ask you to fill out a voter
6 registration card?

7 A. Yeah, I filled out one.

8 Q. Okay. When did you do that, if you remember?

9 A. It was during the holidays.

10 Q. Like December?

11 A. Yeah.

12 Q. Okay. And --

13 A. It was during the break.

14 Q. What --

15 MR. WYDE: I apologize, Your Honor.

16 Q. Now, you have a sister named Raquel?

17 A. Yes.

18 MR. WYDE: May I approach the witness?

19 THE COURT: Yes.

20 MR. WYDE: Okay.

21 Q. (BY MR. WYDE) Is that your signature there,
22 Veronica?

23 A. Uh-huh.

24 Q. At the bottom?

25 A. Uh-huh.

1 Q. Yes? You have to say yes or no for this young
2 lady (pointing).

3 A. Yes.

4 Q. Okay. Thank you. And it lists the
5 registration address as 2331; is that correct?

6 A. Uh-huh.

7 Q. Yes?

8 A. Yes.

9 Q. Okay. And you vote -- you registered at that
10 address even though you've never lived there?

11 A. Uh-huh.

12 Q. Is that correct?

13 A. Yes.

14 Q. And since you've never lived there, is it fair
15 to say you have no intent to move there or return there
16 anytime in the near future?

17 A. I haven't lived there.

18 Q. Ever?

19 A. Huh-uh.

20 Q. Okay. Now, what about your sister, Raquel,
21 where does she live?

22 A. She lives with me.

23 Q. Out in Mesquite?

24 A. Yeah.

25 Q. All right. And that would be at your dad's

1 house at 2408 Boardwalk?

2 A. Yes.

3 Q. And who else lives out there with you?

4 A. My family. Me and my mom, my sister, my
5 brother.

6 Q. Okay. What's your brother's name?

7 A. Francisco IV.

8 Q. Okay. And what's your mom's name?

9 A. Audrey.

10 Q. All right. To your knowledge, have y'all ever
11 lived on -- have y'all ever lived on Douglas or Knight
12 Street?

13 A. No.

14 Q. Not since you've been born?

15 A. Right.

16 Q. Not for 20 years?

17 A. Right.

18 Q. Are you the youngest, the oldest, or the
19 middle?

20 A. I was the oldest -- or the youngest for 14
21 years, and then my brother came.

22 Q. I didn't quite under --

23 A. So I'm kind of the middle, but I've been the
24 youngest for a long time, so I'm middle child,
25 technically.

1 Q. Oh. How old's Frank?

2 A. He's five. Yeah.

3 Q. Yeah. He's the youngest?

4 A. Yes.

5 Q. Okay. Did he vote in this election?

6 A. No.

7 Q. Just checking. Okay. So for the last 20
8 years, to your knowledge, certainly Frank, your dad,
9 your mom, Audrey, yourself, and Raquel have never lived
10 anywhere else except 2408 Boardwalk in Mesquite, Texas?

11 A. Well, we lived in Mesquite -- like a few homes
12 in Mesquite, but we've lived in Mesquite.

13 Q. Right. Now, you know, I -- did anybody explain
14 to you that you're not supposed to register to vote
15 somewhere where you're not living?

16 A. No.

17 Q. No?

18 A. Huh-uh.

19 Q. Did -- when did that happen -- you know, tell
20 me a little bit about when Carlos asked you to do that.

21 A. I mean, he just asked me and I didn't really
22 know anything. I was just like okay, sure, I mean --

23 Q. Merry Christmas?

24 A. Yeah.

25 Q. Good luck?

1 A. I -- nobody explained to me how it worked. I
2 didn't -- I wasn't even registered here, to begin with.
3 I lived in Missouri when I turned 18.

4 Q. Right. Right.

5 A. So I was registered there, and I registered to
6 vote here after that.

7 Q. Okay.

8 A. So I -- yeah.

9 Q. You don't want to get anybody in trouble, you
10 were just trying to basically help out a relative?

11 A. Right.

12 Q. Okay. Did he do the same thing with Raquel?

13 A. We both did it at the same time.

14 Q. Okay. And was that --

15 A. We were both there.

16 Q. And was that at Carlos' request?

17 A. What?

18 Q. Was that at Carlos' request or asking?

19 A. Oh, yeah.

20 Q. Did he have a form for you to fill out?

21 A. Registration.

22 Q. Card or something?

23 A. Yeah.

24 Q. And you just basically signed off on it?

25 A. Yes.

1 Q. And he filled in the addresses or anything like
2 that?

3 A. I really don't remember how we filled it out or
4 anything. I just remember signing it.

5 Q. Okay. Has -- you know, has anybody made any
6 comments to you about testifying today?

7 A. About what?

8 Q. About coming to court and just telling what
9 happened. Has anybody made any comments to you about
10 this?

11 A. Well, I mean, since I got subpoenaed, they were
12 like, okay, well -- yeah, like, my dad, of course, was
13 like, okay, you know, you have to go to court now, you
14 know, and he explained to me what's going to happen.

15 Q. Did he tell you about me, that I had horns and
16 a tail and I breathe fire, and I was going to accuse you
17 of all sorts of heinous criminal conduct?

18 A. No, they didn't say anything about, like
19 what -- they just told me what I was forward -- like
20 going into.

21 Q. Right. Right. I'm sure your father told you
22 there was a long history, I'm sure you're aware of who
23 your great-grandfather was, Civil Rights leader within
24 the Hispanic community that, you know, maybe your dad or
25 even your grandfather owned some rental houses over

1 there in West Dallas, that kind of thing; is that right?

2 A. Yes.

3 Q. Okay. More tradition than anything else,
4 right?

5 A. What?

6 Q. That's kind of -- voting over there is more of
7 a tradition than anything else?

8 A. I don't know. I don't know what that means.

9 Q. Okay. Okay. Well, is --

10 (Mr. Wyde's cell phone vibrating)

11 MR. WYDE: Sorry, Your Honor.

12 Q. (BY MR. WYDE) Do you know where Ricardo --
13 where he lives over on Douglas?

14 A. I can point to the house, but I can't tell you
15 what address.

16 Q. Right. Did you see Carlos and Ricardo or Adam
17 or any of your other relatives, you know, between
18 January and February when the -- kind of the campaign
19 was gearing up?

20 A. No. I didn't -- I didn't even know there was
21 campaigning, you know, like I was involved with my
22 aunt's campaign back in like 2004.

23 Q. Yes.

24 A. But I haven't been involved in anything since
25 then.

1 Q. Okay.

2 A. So --

3 Q. Okay. Do you know about these mail-in ballots
4 and these home ballots and things like that and --

5 A. No.

6 Q. -- you haven't been asked to go help people get
7 their ballot and put it in the mail?

8 A. No.

9 Q. Okay. How about your sister, has she ever been
10 asked to do that, if you know?

11 A. I don't know.

12 Q. Okay. And isn't Sylvia out there, too?

13 A. Yes.

14 Q. Okay. And --

15 THE COURT: When you say out there, what
16 are you talking about?

17 MR. WYDE: Out in the hallway. Excuse me.

18 THE COURT: Oh.

19 Q. (BY MR. WYDE) And is Raquel out there?

20 A. No.

21 Q. She is not?

22 A. She didn't get subpoenaed.

23 Q. Okay. Did she not want to come?

24 A. I don't know. I don't ever talk to her.

25 Q. You don't ever talk to your sister?

1 A. No.

2 Q. Okay. Did y'all get interviewed by Channel 8
3 Brett Shipp about --

4 A. Just me.

5 Q. Just yourself?

6 A. Yes.

7 Q. Is that correct?

8 A. Yes.

9 Q. And when you went to vote over at Grauwlyer, do
10 you -- were any of your relatives there administering
11 the election, running the election? Ricardo, Sr. -- did
12 you recognize any family members as being the election
13 judge and the precinct chair, those things?

14 A. No. Like inside the building?

15 Q. Yeah.

16 A. No.

17 Q. You sure?

18 A. Yeah, my uncle like drove us to there, but he's
19 like, I can't go inside or whatever.

20 Q. Your uncle who?

21 A. He -- like he -- we followed him.

22 Q. Your Uncle Carlos?

23 A. Yeah.

24 Q. He actually drove you to the polls?

25 A. No, like he led us there, and he's like, I