

1 there something I've asked you that you didn't  
2 understand?

3 A. No.

4 Q. Okay. Are you going to come back, you know,  
5 two or three weeks from now, and you know, say, oh, man,  
6 when I said Carlos lived on Rotan or Adam lives with my  
7 grandmother, Socorro, and nobody else lives there, that,  
8 you know, somehow I tricked you into saying that or you  
9 were on some kind of medication?

10 A. No.

11 Q. Do you have any questions for me?

12 A. No, I don't think so.

13 Q. Do you want to say to the Judge, hey, I'm  
14 sorry, I let somebody register me there at an address I  
15 didn't live at?

16 A. Yes.

17 Q. Well, why don't you say that to the Judge --

18 A. Well, I mean --

19 Q. -- and if you say it real sincerely, I bet  
20 he'll kind of say, hey, I understand.

21 THE WITNESS: I really didn't know,  
22 honestly. I didn't know -- I thought it was okay  
23 because everybody was telling me, yeah, sure.

24 Q. (BY MR. WYDE) Well, thank you very much for  
25 being here. I think you acted very mature and in a very

1 adult-like way coming to court and being honest. Thank  
2 you.

3 THE COURT: Any questions?

4 MR. WOOD: I do have one question.

5 CROSS-EXAMINATION

6 BY MR. WOOD:

7 Q. When you say someone lives somewhere, do you  
8 understand the difference between the possibility of a  
9 person staying somewhere temporarily and then going  
10 somewhere else and maybe they reside somewhere  
11 differently than -- that they might be living part-time?  
12 Do you understand that concept?

13 A. I understand it.

14 Q. Okay. So when you say that -- and you  
15 testified, I believe, that you don't have any idea  
16 whether Carlos and -- Ms. Perez, is it?

17 A. Yes, Erica.

18 Q. Erica.

19 A. Uh-huh.

20 Q. You don't understand what -- if they don't have  
21 a relationship anymore or what their relationship was  
22 really during this whole period of time?

23 A. I don't -- I'm not sure like on their status  
24 really, but I mean, I knew they were together before,  
25 so --

1 Q. Okay.

2 MR. WOOD: That's all I have.

3 THE COURT: Thank you very much. You're  
4 finally excused.

5 THE WITNESS: Okay.

6 MR. WYDE: Was any other members of your  
7 immediate family out there?

8 THE WITNESS: No, just Sylvia.

9 MR. WYDE: We'll call Sylvia.

10 THE COURT: If you'll go get Sylvia.

11 THE BAILIFF: Yes, Your Honor.

12 THE COURT: If you'll come around, please.

13 THE WITNESS: Yes, sir.

14 THE COURT: If you'll raise your right  
15 hand.

16 (Witness sworn)

17 THE COURT: Thank you. Have a seat.

18 SYLVIA MEDRANO,  
19 having been first duly sworn, testified as follows:

20 DIRECT EXAMINATION

21 BY MR. WYDE:

22 Q. Good afternoon, Ms. Perez. Excuse me, we were  
23 talking about another female a minute ago. I apologize.  
24 You're Ms. Sylvia Medrano?

25 A. That's correct.

1 Q. I apologize. Good afternoon.

2 A. Good afternoon.

3 Q. Thank you for being patient. I realize it's  
4 late in the afternoon. Could you tell me your address,  
5 please?

6 A. My residence address or my --

7 Q. Wherever you sleep at night.

8 A. I sleep at -- on Cortez.

9 Q. Now -- and do you know the gentleman sitting  
10 behind me?

11 A. I do.

12 Q. And how do you know Mr. Sepulveda?

13 A. He was a former employee -- employer.

14 Q. Right. Right. That was kind of what I was  
15 getting at. You worked at the court, if you will,  
16 sometime in the past?

17 A. Yes.

18 Q. May I ask how long?

19 A. I worked for him five months.

20 Q. Okay. And was he a typical judge, real  
21 mean-spirited, walked around with a frown on his face  
22 all the time?

23 A. Not that I recall.

24 Q. All right.

25 THE COURT: He's just trying to get in

1 trouble with me. Don't worry about it.

2 THE WITNESS: Oh.

3 A. I don't recall.

4 MR. WYDE: I never said who I was referring  
5 to.

6 Q. (BY MR. WYDE) Ms. Medrano, you indicated that  
7 now you -- I'm sorry, you live at 3809 Cortez, right?

8 A. Most of the time, yes.

9 Q. Well, are you married?

10 A. No.

11 Q. Okay. Who else lives at 3809 Cortez?

12 A. My children.

13 Q. Yes, ma'am. Could you keep your voice up just  
14 a little bit --

15 A. Yes.

16 Q. -- for Mr. Wood -- for all of us, actually?

17 THE COURT: Yeah, if you'll pull that --

18 THE WITNESS: Is that okay?

19 THE COURT: Yeah, much better. Thank you.

20 Q. (BY MR. WYDE) Your children, may I ask their  
21 names?

22 A. Roman and Ryan.

23 Q. Okay. And is Sonya your sister?

24 A. Sonya --

25 Q. Sonya Medrano.

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A. Yes.

Q. You sure about that?

A. Yes.

Q. That's not a trick question.

A. Well, that's not her last name, but yes.

Q. Oh, okay. Is she married?

A. She is married.

Q. And her last name is what?

A. Is Reese.

Q. Reese?

A. (Moving head up and down)

Q. Okay. May I ask if Patricia and Priscilla are also your sisters?

A. Yes.

Q. Okay. I'm just trying to make sure I'm on the right branch of the family tree.

A. Okay.

Q. And Robert is your father?

A. That's correct.

Q. Where does Robert live?

A. Which Robert?

Q. Your father, Robert.

A. My father, Robert, lives on Douglas.

Q. Okay. Do you know which address?

A. I do not.

1 Q. Does he have a middle name of Edward?

2 A. My father?

3 Q. Yes.

4 A. No.

5 Q. What is his middle name?

6 A. I don't know.

7 Q. You don't know your father's middle name?

8 A. No.

9 Q. Do you have a driver's license?

10 A. I do.

11 Q. Could I see it?

12 A. Yes.

13 Q. You asked which Robert -- you said which  
14 Robert, and I didn't understand. Do you -- is there  
15 another Robert in your immediate family?

16 A. Yes.

17 Q. Would that be your brother?

18 A. No.

19 Q. Okay. What other Robert is there besides  
20 Robert Medrano, your father?

21 A. My son.

22 Q. So you have Roman, Ryan, and Robert?

23 A. That's correct.

24 Q. Any others?

25 A. No.

1 Q. Okay. Is -- how old is Robert, your son?

2 A. 21.

3 Q. Okay. And does he live with you?

4 A. No.

5 Q. Where does he live?

6 A. He lives near Bachman Lake.

7 Q. Okay. Have you been to his house before?

8 A. I have been there, yes.

9 Q. Do you know what street?

10 A. I believe it's Bolivar.

11 Q. Bolivar?

12 A. Bolivar.

13 Q. Is that B-O-L-I-V-A-R?

14 A. That's correct.

15 Q. Okay. Who is Eva Pachicano?

16 A. My daughter-in-law.

17 Q. Okay. And who is she married to?

18 A. She's married to Robert, my son.

19 Q. I'm just glad I don't have to pay for dinner  
20 when you go out to eat.

21 A. (Handing driver's license)

22 Q. Yes, ma'am. Thank you.

23 A. You're welcome.

24 MR. WYDE: May I make a quick --

25 THE COURT: You may.

1 MR. WYDE: -- copy so I can give her back  
2 her license?

3 Q. (BY MR. WYDE) Am I correct in understanding  
4 that you own the house at 3809 Cortez?

5 A. The bank actually owns it.

6 Q. I understand entirely. Does that mean that you  
7 are buying it from the bank, or did they foreclose on it  
8 recently?

9 A. I am buying it from the bank.

10 Q. Okay. And do you claim a homestead exemption  
11 for, you know, tax purposes?

12 A. Wow. I don't recall.

13 Q. How long have you lived there?

14 A. I closed on the house in 1995.

15 Q. Okay. And where did you live prior to that  
16 house?

17 A. I lived on Knight Street.

18 Q. Okay. And would that have been at 2338 Knight?

19 A. No, sir.

20 Q. I'm sorry?

21 A. No.

22 Q. No? May I ask what that address on Knight  
23 Street would be?

24 A. 2335.

25 Q. Excuse me. Okay. And how long ago did you

1 live there?

2 A. That I lived there day-to-day or that I spent  
3 the night or stayed?

4 Q. Well, lived there day-to-day.

5 A. Years. I don't recall.

6 Q. I'm sorry?

7 A. Years. I don't recall how many.

8 Q. Right. Well, how old is Roman and Ryan?

9 A. Roman is 15 and Ryan is 7.

10 Q. Roman's 15 and Ryan's 7?

11 A. Yes, sir.

12 Q. Okay. Do you see Robert and Eva on a very  
13 often basis?

14 A. No.

15 Q. You said you have lived at -- or you started  
16 buying this other house at 3809 Cortez 15 years ago,  
17 right?

18 A. That's correct.

19 Q. Okay. And so that would have put us roughly in  
20 '95-ish?

21 A. Yes.

22 Q. Is that right?

23 A. Yes.

24 Q. And that means that clearly Ryan, he's never  
25 lived there on Knight?

1 A. No.

2 Q. And Roman's 15 and that had been roughly about  
3 the time that you had left Knight Street and moved over  
4 to Cortez; is that right?

5 A. Roman did live on Knight.

6 Q. On Knight when he was born, is that where you  
7 brought him home to?

8 A. We had stayed there during separation from my  
9 marriage.

10 Q. Okay. When --

11 A. Several times.

12 Q. Yes, ma'am. Well, so are you finally divorced  
13 now?

14 A. I am divorced from my second husband.

15 Q. Okay. And when's the last time you stayed on  
16 Knight Street?

17 A. I don't recall.

18 Q. Okay. Well, when was your second husband's and  
19 your divorce from him final?

20 A. Three years.

21 Q. Okay. Where did Robert go to high school?

22 A. He went to Townview.

23 Q. Is that one of the magnet schools?

24 A. Yes.

25 Q. Had he not gone to a magnet school, what's the

1 high school that feeds in off of Knight Street?

2 A. North Dallas.

3 Q. Okay. And what's the high school that would  
4 have normally fed in off of Cortez?

5 A. I don't know. Maybe Hillcrest or -- I don't  
6 know.

7 Q. I don't know where Cortez is. Can you give me  
8 the major cross intersection?

9 A. It's near Bachman Lake.

10 Q. Okay. Was that on the south -- that's on the  
11 north side of Love Field?

12 A. Yes.

13 Q. Okay. And Knight Street is on the south side  
14 down there by -- is it closer to -- closer to the  
15 hospital?

16 A. Yes.

17 Q. UT Southwestern?

18 A. Yes.

19 Q. Do they have the same high school, if you know?

20 A. I don't know. I don't know.

21 Q. Right. But you don't -- you wouldn't have  
22 known what high school your son would have gone to had  
23 he not gone to Townview?

24 A. No.

25 Q. Which high school does Roman go to?

1 A. Roman attends Townview.

2 Q. Okay. When's the last time Robert and Eva  
3 lived on Knight Street?

4 A. I don't know.

5 Q. Well, who owns the house at 2335 Knight?

6 A. I don't know.

7 Q. Well, how could you stay somewhere in someone's  
8 house when you were separated and you not even know who  
9 owns it?

10 A. Well, I don't know who owns it, but I know who  
11 lives there.

12 Q. Okay. Who lives there?

13 A. My uncle.

14 Q. Your uncle?

15 A. Yes.

16 Q. Which uncle?

17 A. Ricardo.

18 Q. Oh, okay. Now, would that be Ricardo, Sr. or  
19 Ricardo, Jr.?

20 A. Ricardo, Sr.

21 Q. Okay. Where does Carlos live?

22 A. Carlos lives on Douglas.

23 Q. With who?

24 A. With his mother.

25 Q. Socorro?

1 A. Yes.

2 Q. Okay. Where does Eva Perez live?

3 A. I don't know who that is.

4 Q. Excuse me, Erica Perez.

5 A. She lives -- she lives off of Webb Chapel.

6 Q. Have you been to her home?

7 A. Yes.

8 Q. Was Carlos there?

9 A. Yes.

10 Q. How many bedrooms in that house?

11 A. I don't know.

12 Q. How many times have you been there?

13 A. Maybe two or three.

14 Q. And you never walked through the house?

15 A. No, not to the bedrooms.

16 Q. Okay. Is this your signature, Ms. Medrano?

17 A. Yes.

18 Q. Okay. And is this your daughter-in-law's  
19 signature?

20 A. I don't know.

21 Q. Is this your son's signature?

22 A. I don't know.

23 Q. You don't know your son's signature?

24 A. No.

25 Q. He's 21, he went to high school; is that

1 correct?

2 A. Yes.

3 Q. He lived with you all that time?

4 A. Yes.

5 Q. He never had to sign school papers or anything  
6 like that?

7 A. I don't recognize his signature.

8 Q. And is that your driver's license?

9 A. Yes.

10 Q. You said your son lives on Knight -- Bolivar?

11 A. Yes.

12 Q. How long has he lived there?

13 A. I don't know, a couple of years.

14 Q. And before that, where did he live?

15 A. He lived on Cortez.

16 Q. Okay. Well, did your son and yourself register  
17 to vote at your uncle's house so you could basically  
18 vote for Adam or Carlos or Pauline or whomever?

19 A. I registered there when -- in 1993.

20 Q. And you haven't actually lived there  
21 permanently for 15 years?

22 A. That is my permanent home.

23 Q. Ma'am --

24 A. Yes.

25 Q. -- you realize you're under oath?

1 A. Yes.

2 Q. You don't own the house?

3 A. I do not own the house.

4 Q. It's owned by your uncle?

5 A. I don't know who owns it.

6 Q. You don't even know who owns it. You just know  
7 your Uncle Ricardo, Sr. lives there?

8 A. I know that is my permanent home.

9 Q. Ma'am, just -- if I suggested to you, because  
10 you say that here in court, it doesn't make it true,  
11 would you understand what I'm saying?

12 A. Yes, I do.

13 Q. Okay. Who told you that's your permanent home?

14 A. I consider that my permanent home.

15 Q. No, ma'am, who told you -- who gave you a legal  
16 opinion? Did some attorneys tell you that that could be  
17 your legal home?

18 A. No.

19 Q. How about 1600 Pennsylvania Avenue, do you want  
20 to live there?

21 A. No.

22 Q. Do you want that to be your legal home?

23 A. No.

24 Q. Why do you want your uncle's house to be your  
25 legal residence when you haven't lived there in 15

1 years?

2 A. I was born there. I lived there for 20 years.  
3 I have furniture there. I have a bed there and stay  
4 there whenever I want to. I have keys there. That's my  
5 mailing address.

6 Q. You don't get any mail at 3809 Cortez?

7 A. I do get mail there.

8 Q. Did you bring with you any of the things in the  
9 subpoena including an electric bill? You were  
10 subpoenaed to come to court today, correct?

11 A. That's correct.

12 Q. Do you have a copy of the subpoena?

13 A. Yes.

14 Q. Could you pull that out?

15 A. Yes.

16 Q. It asks for a photo ID, correct?

17 A. I brought that, yes.

18 Q. Yes. And your driver's license picture  
19 indicates that you told the Texas Department of Public  
20 Safety anytime they want to get ahold of you for any  
21 reason whatsoever, they're to contact you at what  
22 address?

23 A. They can contact me at 3809 Cortez.

24 Q. Right. Right. So you tell the government down  
25 in Austin to find you at 3809 Cortez?

1 A. Yes.

2 Q. And if you were subpoenaed for jury duty, you  
3 understand that would be off of this address, correct?

4 A. No.

5 Q. Okay.

6 A. I just --

7 Q. You understand that your jury duty, you'd be  
8 subpoenaed off of ad valorem tax records or property tax  
9 records which is what?

10 A. I just served jury duty.

11 Q. Yes, ma'am. And you got the summons at 3809  
12 Cortez, didn't you?

13 A. No, sir.

14 Q. Now, did you bring the summons with you?

15 A. No, but I brought my paycheck.

16 Q. And where does that go to?

17 A. To 2335 Knight Street.

18 Q. Okay. Is that automatically deposited?

19 A. No.

20 Q. You receive a paycheck there?

21 A. Yes, sir.

22 Q. What about your gas bill, your utility bill,  
23 and your electric bill, water bill --

24 A. Those --

25 Q. -- did you bring any of those from this year?

1 A. For which address?

2 Q. For wherever you receive them. Do you pay the  
3 gas bill at 2335 Knight?

4 A. No.

5 Q. Do you pay the electric bill at 2335 Knight?

6 A. No.

7 Q. Do you pay the water bill at 2335 Knight?

8 A. No.

9 Q. You don't even know who owns 2335 Knight?

10 A. Correct.

11 Q. So you don't pay the property taxes at 2335  
12 Knight, do you?

13 A. No.

14 Q. You don't pay the insurance at 2335 Knight?

15 A. No.

16 Q. Do you pay rent at 2335 Knight?

17 A. No.

18 Q. Do you pay any landscaping bills at 2335  
19 Knight?

20 A. No.

21 Q. Okay. Now, did you bring a bank statement with  
22 you?

23 A. No.

24 Q. Did you bring a tax return like it asked you  
25 for?

1 A. No.

2 Q. Where do you tell the federal government to  
3 send your paperwork when you fill out your taxes?

4 A. I don't recall receiving any paperwork from  
5 them.

6 Q. You don't pay taxes every year with a 1040 or  
7 1040EZ form?

8 A. Yes, I do.

9 Q. Uh-huh. And don't you send that in from the  
10 Cortez address?

11 A. I electronically file, but I haven't received  
12 anything from the government.

13 Q. Yes, ma'am. So your childhood residence was  
14 2335 Knight?

15 A. That's correct.

16 Q. Were you born in the house or at the hospital?

17 A. I'm not sure.

18 Q. You --

19 A. I don't remember.

20 Q. Your parents didn't tell you where you were  
21 born?

22 A. I'm sure I was born in a hospital.

23 Q. Right. Because you said you were born --

24 A. I don't remember.

25 Q. You indicated you were born in that house.

1 That's what you said just a few minutes ago, right?

2 A. Yes.

3 Q. Correct? As if there was a midwife there or  
4 the doctor came there and your mom gave birth to you  
5 right there in that home, right?

6 A. Right.

7 Q. That's what you said?

8 A. That's what I said.

9 Q. Did you want us to believe that?

10 A. Yes.

11 Q. But you just now told us you were born in a  
12 hospital?

13 A. I don't recall where I was born. I don't  
14 remember.

15 Q. What did your mom or your dad or any of your  
16 aunts or your uncles or myancestry.com tell you?

17 A. I don't know what that is.

18 Q. Do you have a birth certificate?

19 A. I do.

20 Q. Was it issued by a hospital?

21 A. I'm not sure who issued it.

22 Q. You've never looked at your birth certificate?

23 A. I don't know who issued it.

24 Q. You want this Judge to believe you're telling  
25 us the truth when you say -- when you say that somehow,

1 some way, that 2335 Knight --

2 A. Uh-huh.

3 Q. -- whom you don't even know owns, where your  
4 uncle lives, your children don't live there, and you  
5 haven't lived there permanently for 15 years, and you  
6 want to come into a court of law on the record under  
7 oath and you want to say you consider that your  
8 permanent home?

9 A. Yes.

10 Q. Why do you want to say that? Is that to avoid  
11 being prosecuted for lying under oath?

12 A. No. Because as soon as this house is paid for  
13 on Cortez, that's where I'm going to live.

14 Q. Well, don't you think the owner there might  
15 have something to say about that?

16 A. I don't think they'll be there by then.

17 Q. Well, who is that owner?

18 A. I don't know.

19 Q. Well, how do you know that that owner doesn't  
20 have children or they might leave it to a church or they  
21 could sell it to someone else?

22 A. I grew up there.

23 Q. I didn't ask you where you grew up, ma'am. You  
24 understand the fantasy that you're --

25 MR. WOOD: Objection, Your Honor.

1 Q. -- embracing right now, do you not?

2 THE COURT: Sustained.

3 MR. WYDE: I apologize, Judge, but I  
4 thought that was a not -- I mean, I thought that was a  
5 good faith question. It's a fantasy to say I want to  
6 live somewhere when I don't even know who the owner is  
7 and that's where you're going to live.

8 MR. WOOD: I object. It's been sustained.

9 THE COURT: The -- I think I've gotten your  
10 point in the questioning on that. Let's move along.

11 (Contestant's Exhibit No. 152 marked.)

12 MR. WYDE: We'll offer Exhibit 152.

13 MR. WOOD: No objections, Your Honor.

14 THE COURT: Admitted.

15 Q. (BY MR. WYDE) Did you vote in 2008?

16 A. I'm sure I did.

17 Q. Did you vote out of your Cortez precinct, or  
18 did you vote out of the Knight precinct?

19 A. I voted out of the Knight precinct.

20 Q. How about 2006?

21 A. It had to be the Knight precinct.

22 Q. How about 2004?

23 A. It had to be the Knight precinct.

24 Q. How old were you in 1988?

25 A. I was 12 years old.

1 Q. Okay. And do you recall your father and your  
2 uncles all being highlighted in a 1988 voter fraud case  
3 here in Dallas?

4 MR. WOOD: Objection, Your Honor, this has  
5 absolutely --

6 THE COURT: Sustained.

7 MR. WYDE: No further questions.

8 MR. WOOD: No questions, Your Honor.

9 THE COURT: You may step down.

10 THE WITNESS: Thank you.

11 MR. WYDE: We'll call Ms. Woertendyke.

12 THE COURT: I'll tell will you what, let's  
13 take a five-minute break and then we'll --

14 (Discussion off the record.)

15 THE COURT: Let's resume at 9:00 a.m. in  
16 the morning.

17 (Proceedings recessed at 5:00 p.m.)  
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REPORTER'S CERTIFICATE

1  
2 THE STATE OF TEXAS )  
3 COUNTY OF DALLAS )

4 I, Larissa L. McPhearson, Certified Shorthand  
5 Reporter in and for the State of Texas, do hereby  
6 certify that the above and foregoing contains a true and  
7 correct transcription of all portions of evidence and  
8 other proceedings requested in writing by counsel for  
9 the parties to be included in this volume of the  
10 Reporter's Record, in the above-styled and -numbered  
11 cause, all of which occurred in open court or in  
12 chambers and were reported by me.

13 I further certify that this Reporter's Record of  
14 the proceedings truly and correctly reflects the  
15 exhibits, if any, admitted by the respective parties.

16 I further certify that the total cost for the  
17 preparation of this Reporter's Record is \$ \_\_\_\_\_ and  
18 was paid by Mr. Dan L. Wyde.

19 WITNESS MY OFFICIAL HAND this the 1st day of  
20 September, 2010.

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*Larissa L. McPhearson*

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