

1 THE COURT: Okay.

2 Come up, Deputy.

3 You may proceed.

4 MS. FAIAZ: Thank you, Judge.

5 **ROLAND PEREZ,**

6 having been previously sworn, testified as follows:

7 **DIRECT EXAMINATION**

8 **BY MS. FAIAZ:**

9 Q. Deputy Perez, the jury has heard from  
10 you twice so far. I want to direct your attention  
11 towards -- you were mentioning when you testified  
12 prior that at some point you walked the Defendant  
13 from the women's restroom to your car; is that  
14 correct?

15 A. Yes, ma'am.

16 Q. And when you arrived at the patrol  
17 vehicle, what did you do?

18 A. I got his information, his personal  
19 information.

20 Q. Okay. Why do you do that?

21 A. So I can identify him to make sure he's  
22 the person he tells me he is.

23 Q. Is that typical procedure?

24 A. Yes, ma'am.

25 Q. Do it in every case?

1           A.    Every case.

2           Q.    All right.  As part of your typical  
3 procedure, how do you go about identifying somebody?

4           A.    I usually -- it depends.  Sometimes they  
5 have a wallet on them.  Sometimes they have only  
6 their identification card or, you know, they tell me  
7 other means.  Then I've got to take a verbal and try  
8 to look them up on either criminal history or  
9 somewhere else.

10          Q.    Okay.  And in this case the Defendant  
11 gave you a name?

12          A.    Yes.

13          Q.    Did he give his name, Deigo Rojas?

14          A.    Yes.

15          Q.    Did you attempt to further identify him  
16 by any means?

17          A.    Yes, ma'am, I did.

18          Q.    How did you do that?

19          A.    I'm not sure if he had a wallet on him  
20 or not.  On my report I wrote that he had a Social  
21 Security card, and that's how I also identified him  
22 by.

23                   MS. FAIAZ:  May I approach the  
24 witness, Judge?

25                   THE COURT:  You may.



1     *Security card, offered.)*

2                   MR. AYERS:  If I may have just a  
3 moment, Judge?

4                   *(Brief pause.)*

5                   MR. AYERS:  I have no objection,  
6 Judge, to that exhibit.

7                   THE COURT:  All right.  18 is  
8 admitted.

9                   *(State's Exhibit No. 18 admitted.)*

10                  MS. FAIAZ:  May I publish, Judge?

11                  THE COURT:  You may.

12                  Q.    (By Ms. Faiaz)  Deputy, when you  
13 obtained this card, did you ask any questions about  
14 it?

15                  A.    No, ma'am.

16                  Q.    Okay.  Did the Defendant volunteer any  
17 information about it?

18                  A.    Yes.

19                  MR. AYERS:  Your Honor, I object to  
20 any hearsay at this point.

21                  THE COURT:  Overruled.

22                  Q.    (By Ms. Faiaz)  What information did the  
23 Defendant volunteer about that card?

24                  A.    He told me it was fake.

25                  Q.    Okay.  Based off of your training and

1 your experience, have you had the opportunity to  
2 come into contact with Social Security cards?

3 A. Yes.

4 Q. Would you say on few occasions or on  
5 many occasions?

6 A. On many occasions.

7 Q. All right. Based off of your training  
8 and experience, did you make any observations about  
9 this Social Security card?

10 A. Yes, ma'am. It looks different.

11 Q. And what about it looks different?

12 A. The color of the background of the blue  
13 appears to be faded and the lettering appears to be  
14 very dark. If it was faded, then the whole entire  
15 card would be faded, in my opinion.

16 Q. Okay. Now, did you take any steps to  
17 verify whether or not this Social Security card was  
18 genuine?

19 A. I don't remember if I did or not, but he  
20 told me it was -- it was fake.

21 Q. And you went off of what he said?

22 A. Yes, ma'am.

23 MS. FAIAZ: Judge, I pass the  
24 witness.

25 THE COURT: Defense?

1 MR. AYERS: A couple of questions  
2 if I might, Judge.

3 **CROSS-EXAMINATION**

4 **BY MR. AYERS:**

5 Q. If you had done anything, Deputy Perez,  
6 to somehow try to verify that this Social Security  
7 card was fake or real, that would be in your offense  
8 report, wouldn't it?

9 A. Yes, sir.

10 Q. And there's nothing in your offense  
11 report about that, right?

12 A. No, sir.

13 Q. And you don't have any independent  
14 recollection of doing anything about that, right?

15 A. No, sir, I don't.

16 Q. So the reason you decided that Social  
17 Security card was fake was pretty much because  
18 you're saying he volunteered to you that it was  
19 fake, right?

20 A. Yes, he told me it was fake, yes.

21 Q. All right. So certainly he didn't try  
22 to represent it to you as real or in any way have  
23 you rely on it as real. He told you it was fake,  
24 right?

25 A. After I was looking at it for quite some

1 time, he told me it was fake, yes.

2 Q. All right. But that's pretty much it,  
3 right?

4 A. Yes.

5 MR. AYERS: Okay. I'll pass the  
6 witness, Judge.

7 THE COURT: State.

8 MS. FAIAZ: Nothing further, Judge.

9 THE COURT: May this witness be  
10 excused?

11 MS. FAIAZ: Yes, Judge.

12 MR. AYERS: I have no objection to  
13 that, Judge.

14 THE COURT: All right. Deputy,  
15 you're finally free to go.

16 MS. FAIAZ: Judge, the State rests  
17 and closes.

18 THE COURT: Defense.

19 MR. AYERS: Is that pretrial lady,  
20 she still here?

21 MS. FAIAZ: She's still here.

22 MR. AYERS: Your Honor, at this  
23 time the Defense calls to the stand Gabriella Garza.

24 THE BAILIFF: The witness needs to  
25 be sworn, Your Honor.