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6 *Respondent*

7 **BEFORE THE PRESIDING DISCIPLINARY JUDGE**

8 )  
9 **PDJ 2023-9096**

10 IN THE MATTER OF A MEMBER OF  
11 THE STATE BAR OF ARIZONA,

) **ANSWER TO COMPLAINT**

) [State Bar Nos. 23-1165 and 23-1985

12 BRYAN JAMES BLEHM,  
13 Bar No. 023891

14 )  
15 Respondent.

16 Respondent hereby files his Answer to the State Bar of Arizona’s (hereinafter  
17 “SBA”) Complaint. By way of this Answer, Respondent admits, denies, and alleges as  
18 follows:

19 **GENERAL ALLEGATIONS**

20 1. Respondent admits the allegations contained in Paragraph 1 of the SBA’s  
21 Complaint.

22 **COUNT ONE (File No. 23-1165/State Bar of Arizona)**

23 2. In response to Paragraph 2 of SBA’s Complaint, Respondent admits the  
24 allegations contained therein but denies that he and his co-counsel sought to mislead the  
25 Arizona Supreme Court.

26 3. In response to Paragraph 3 of SBA’s Complaint, Respondent denies that he  
27 and his co-counsel sought to mislead the Arizona Supreme Court. Respondent further  
28 asserts that the Order entered by the Arizona Supreme Court speaks for itself. Further, the

1 Supreme Court’s Order states that the basic number was a fact in dispute. Respondent,  
2 however, was doing nothing more than basic math based on an assertion of counsel for  
3 former Secretary of State Hobbs in her response brief in the underlying appeal that two  
4 chain of custody forms entered as trial exhibits by defendants showed Maricopa followed  
5 chain of custody procedures. Specifically, Hobbs’ counsel argued that two types of chain  
6 of custody forms entered as defense exhibits at trial would cause Maricopa to “be aware  
7 of any ballot ‘inserted or rejected or lost’ in any part of the process.” Respondent simply  
8 added up the number of ballots on the chain of custody forms for ballots dated as processed  
9 on Election Day and pointed out the discrepancy in the number of ballots between the two  
10 exhibits—based on the number of ballots received by Runbeck on Election Day versus  
11 the number of ballots Runbeck recorded as having processed on Election Day—a  
12 discrepancy which, according to Hobbs’ counsel’s own argument, showed that Maricopa  
13 would know if “any” ballot was inserted or removed during the election. Had counsel for  
14 Hobbs argued that  $2+2=y$  and we responded by saying everyone stipulates that  $y=4$ , would  
15 such an argument be misleading?

16 4. In response to Paragraph 4 of SBA’s Complaint, Respondent denies that he  
17 and his co-counsel sought to mislead the Arizona Supreme Court. Respondent further  
18 asserts that the Order entered by the Arizona Supreme Court speaks for itself.

19 5. In response to Paragraph 5 of SBA’s Complaint, Respondent denies that he  
20 and his co-counsel sought to mislead the Arizona Supreme Court. Respondent further  
21 asserts that the Order entered by the Court of Appeals speaks for itself. With Respect to  
22 the Court of Appeals ruling, Respondent asserts that Maricopa County was obligated by  
23 law to maintain full Chain of Custody, which includes maintaining precise counts of  
24 ballots from each vote center and drop box received through and including Election Day.<sup>1</sup>  
25 *See* A.R.S. 16-453 and the 2022 Election Procedures Manual at Chapter 2: Early Voting,

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26 <sup>1</sup> These safeguards existed so that when Maricopa County delivers the ballot affidavit  
27 envelopes to Runbeck Election Services, a for profit private corporation, for processing,  
28 Maricopa County knows exactly how many it should receive back. In other words, the  
equation Total Election Day Drop Box Ballots Received = Total Number Returned from  
Runbeck.

1 Section I(I)(7), Chapter 9: Election Day, Section VIII(B)(2)(g) and Chapter 10: Central  
2 Counting Place Procedures, Section II(B)(1).

3 6. In response to Paragraph 6 of SBA's Complaint, Respondent denies that he  
4 and his co-counsel sought to mislead the Arizona Supreme Court. Respondent further  
5 asserts that the quoted language from Respondent's reply brief speaks for itself which is  
6 an accurate statement based on the argument made by Gov. Hobbs' counsel as discussed  
7 in ¶ 3 above. Respondent states further that none of the defendants in the underlying action  
8 took any step to dispute this contention made in Respondent's reply brief by requesting  
9 oral argument after the reply brief was filed, as was their right under ARCAP 18(a), or by  
10 seeking leave to file a sur-reply.

11 7. In response to Paragraph 7 of SBA's Complaint, Respondent denies that he  
12 and his co-counsel sought to mislead the Arizona Supreme Court. Respondent further  
13 asserts that the Order entered by the Court of Appeals speaks for itself. Respondent states  
14 further that the Order failed to address Respondent's argument on reply that Hobb's  
15 assertion described in ¶ 3 above showed a 35,563 discrepancy in the number of ballots.  
16 With Respect to the Court of Appeals ruling, Respondent asserts that Maricopa County  
17 was obligated by law to maintain full Chain of Custody, which includes precise counts of  
18 ballots from each vote center and drop box received on election day. *See* ARS §16-452  
19 and the Election Procedures Manual at Chapter 2: Early Voting, Section I(I)(7), Chapter  
20 9: Election Day, Section VIII(B)(2)(g) and Chapter 10: Central Counting Place  
21 Procedures, Section II(B)(1).

22 8. In response to Paragraph 8 of SBA's Complaint, Respondent denies that he  
23 and his co-counsel sought to mislead the Arizona Supreme Court. Respondent  
24 incorporates the response in ¶ 3 above, and further asserts that their briefing speaks for  
25 itself. With Respect to counsels' argument, Respondent asserts that Maricopa County was  
26 obligated by law to maintain full Chain of Custody, which includes precise counts of  
27 ballots from each vote center and drop box received on election day. *See* ARS §16-452  
28 and the Election Procedures Manual at Chapter 2: Early Voting, Section I(I)(7), Chapter

1 9: Election Day, Section VIII(B)(2)(g) and Chapter 10: Central Counting Place  
2 Procedures, Section II(B)(1). The Secretary of State had previously argued that the counts  
3 maintained by Maricopa County would enable them to determine whether ballot affidavit  
4 envelopes were injected into the system. Thus, Respondent and his co-counsel held that  
5 as an undisputed fact and did nothing more than present the mathematical computation  
6 based on the exhibits submitted by defendants in their response brief.<sup>2</sup>

7 9. In response to Paragraph 9 of SBA's Complaint, Respondent denies that he  
8 and his co-counsel sought to mislead the Arizona Supreme Court. Respondent further  
9 asserts that the briefing submitted by counsel for the Secretary of State speaks for itself.  
10 With Respect to the position taken by the Secretary of State, Respondent asserts that  
11 Maricopa County was obligated by law to maintain full Chain of Custody, which includes  
12 precise counts of ballots from each vote center and drop box received on election day prior  
13 to transferring those ballot affidavit envelopes to Runbeck for processing. *See* ARS §16-  
14 452 and the Election Procedures Manual at Chapter 2: Early Voting, Section I(I)(7),  
15 Chapter 9: Election Day, Section VIII(B)(2)(g) and Chapter 10: Central Counting Place  
16 Procedures, Section II(B)(1). Counsel for the Secretary of State argued that given the  
17 exhibits they submitted with their response brief (Maricopa County chain of custody  
18 documents), the county would be able to determine whether ballot affidavit envelopes  
19 were injected into the system. Counsel simply relied on the defense exhibits to provide a  
20 mathematical computation of at least 35,563 ballot affidavit envelopes that have no  
21 complete record of delivery to the vendor and no record or retrieval from drop boxes.  
22 Defendants did not refute the mathematical accuracy of that computation.

23 10. In response to Paragraph 10 of SBA's Complaint, Respondent denies that  
24 he and his co-counsel sought to mislead the Arizona Supreme Court. Respondent admits  
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26 <sup>2</sup> It should be noted that counsel for the Maricopa County defendants knowingly failed  
27 to correct the record with respect to the pleadings filed on behalf of Katie Hobbs stating  
28 that the Maricopa County defendants would know how many, if any, ballot affidavit  
envelopes were injected into the system because of records maintained by Maricopa  
County and Runbeck.

1 only that the Supreme Court remanded the matter as stated and that the Supreme Court's  
2 Order speaks for itself.

3 11. In response to Paragraph 11 of SBA's Complaint, Respondent denies that  
4 he and his co-counsel sought to mislead the Arizona Supreme Court. Respondent further  
5 asserts that, as stated in ¶ 3 above, he and his co-counsel were responding to the Secretary  
6 of State's position that Maricopa County maintained proper chain of custody and would  
7 know if any ballots were injected into the system based upon the chain of custody  
8 documentation defendants submitted as two exhibits at trial, and which the Secretary of  
9 State later cited in her appellate response brief. As the Maricopa County defendants did  
10 not make any argument that adding up the receipts reflecting ballots received and  
11 processed on Election Day by Runbeck, Inc., resulted in a discrepancy less than 35,563  
12 ballots supported this position, and thus did not dispute the accuracy of the statement that  
13 supported this position, counsel did nothing more than submit a mathematical computation  
14 of the number of ballots received and processed on Election Day as recorded on the  
15 election day receipts taken from those two defense exhibits. Thus, the statement "The  
16 record indisputably reflects at least 35,563 Election Day early ballots, for which there is  
17 no record of delivery to Runbeck, were added at Runbeck..." Quoted Paragraph 11 of  
18 SBA's Complaint is not misleading.

19 12. Respondent affirmatively denies the alleged falsity of the statement and that  
20 Respondent sought to mislead the Court.

21 13. In response to Paragraph 13 of the SBA's Complaint, Respondent admits  
22 only that Fontes did his Reply brief on the date stated. Respondent denies any additional  
23 allegations raised in Paragraph 13.

24 14. In response to Paragraph 14 of the SBA's Complaint, Respondent admits  
25 that the Arizona Supreme Court awarded sanctions for Respondent's use of the term  
26 "undisputed fact." To the extent Paragraph 14 raises additional allegations, Respondent  
27 denies same.

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1           15. In response to Paragraph 15 of the SBA’s Complaint, Respondent admits  
2 only that the sanction was paid on the date stated. To the extent Paragraph 15 makes any  
3 additional allegations, Respondent denies same.

4           16. In Response to Paragraph 16 of the SBA’s Complaint, Respondent denies  
5 that he made false statements to the Arizona Supreme Court and that Respondent violated  
6 any of the ethical rules cited. The gist of the matter is that the Secretary of State argued  
7 that Maricopa County would know if “any” ballot affidavit envelopes were injected into  
8 or removed from the system based on Maricopa County chain of custody documentation.<sup>3</sup>  
9 Our response was simply to say we agree, and that paperwork demonstrates that Maricopa  
10 County has no records regarding the retrieval and/or delivery of 35,563 ballot affidavit  
11 envelopes. See Chain of Custody documentation submitted by defendants with their  
12 Response Brief attached hereto as Exhibit A. See also ¶ 3 above.

13                           **COUNT TWO (File No. 23-1985/State Bar Of Arizona)**

14           17. Respondent denies that the partial tweet provided by the SBA is  
15 Respondent’s tweet. Rather the partial tweet provided by the SBA is a retweet of  
16 Respondent’s original tweet. The retweet was posted by Arizona attorney Tom Ryan.  
17 Respondent admits that he did in fact originally post the tweet that was retweeted with  
18 comment by Tom Ryan. Respondent further admits that he posted the comments to Mr.

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<sup>3</sup> It should be noted that during the *Lake v. Richer* trial and much of the appeal, Maricopa County withheld certain chain of custody documents until June 2023. An analysis of those subsequently released documents shows that Maricopa County cannot show where 38,672 ballot affidavit envelopes came from on Election Day. See Verity Vote Report, Exhibit B.

1 Ryan's retweet challenging Respondent's mental health. The original tweet provided by  
2 the SBA in its initial Complaint is below.



18. In response to Paragraph 18, Respondent admits he did not produce documents to the SBA to prove all statements in the tweet. Respondent did not produce documents for the following reasons:

A. Tom Ryan, the attorney who responded to my tweet and likely complainant of said tweet, is an anti-MAGA and anti-Trump attorney. Mr. Ryan is associated with or at least a big fan of Mark Elias who is former counsel for the Democrat National Committee and Hillary Clinton, someone read into the phony Russia Gate report, and opposition counsel in at least two political cases I have had since the 2022 election. This complaint is pure politics designed to remove conservative attorneys or intimidate others from bringing meritorious election challenges and further limit the political/legal opposition to the Democratic Party's national agenda.

1           B.     Mr. Ryan represents a former Maricopa County Election Department  
2 employee and is likely seeking documents related to the status of an investigation I am  
3 conducting on behalf of clients. As stated to the SBA, bar complaints are not a proper  
4 tool for discovery, and I refuse to breach my client’s confidentiality for purposes of my  
5 response.<sup>4</sup>

6           C.     Lastly, the SBA’s investigation alleged that I accused the Arizona  
7 judiciary of conspiring. That is a gross misrepresentation of the tweet, which states the  
8 folks doing the conspiring needed to control the media and judicial narrative. They gained  
9 this control by inducing state judiciaries to create disinformation task forces. Just because  
10 the Arizona judiciary initially bought what Ms. Spaulding and her associates were selling  
11 in no way means that the Court was involved in the conspiracy. It was in fact Susan  
12 Spaulding and her associates that convinced Chief Justice Robert M. Brutinel to use his  
13 administrative or housekeeping powers to create a “Disinformation Task Force” in 2019<sup>5</sup>,  
14 but being induced to do something can mean many things and this aspect of our  
15 investigation is ongoing.

16                 We know Ms. Spaulding was a key figure in the growth of the  
17 censorship state as she played central roles<sup>6</sup> in the National Protection and Programs  
18 Directorate (“NPPD”) and Cybersecurity & Infrastructure Security Agency (“CISA”)  
19 before moving to the Center for Strategic and International Studies (“CSIS”). Ms.  
20 Spaulding’s role in creating a vast censorship network was extended to the judiciary when  
21 she moved to CSIS to “strengthen the U.S. judicial system” against Russian attacks and  
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23 <sup>4</sup> Breaching my clients’ confidentiality would be legitimate grounds for bar discipline  
24 pursuant to Ariz. R. Prof’l, Cond. 1.6.

25 <sup>5</sup> A fundamental question Arizona attorneys (myself included), members of the judiciary,  
26 the public, the legislature, the executive branch of government, and the SBA seemingly  
27 forgot to ask is how the Court’s Administrative Powers extend to limiting substantive  
28 speech absent a case or controversy. Such power seemingly belongs to the legislative  
branch of government and the use of administrative powers to delve into the arena of free  
speech is an unconstitutional invasion of those legislative powers especially political free  
speech during a Presidential election.

<sup>6</sup> Ms. Spaulding’s rank is stated as being the equivalent of a 4-star general when compared  
to her military counterparts.



1 of course disinformation. Ms. Spaulding even boasts about training judges in Russian  
2 disinformation and its perils.

3           The system of censorship created in part by Ms. Spaulding was  
4 viewed by one court as so pervasive that “the United States Government seems to have  
5 assumed a role similar to an Orwellian ‘Ministry of Truth’” and “arguably involves the  
6 most massive attack against free speech in United States’ history.” *See State of Missouri*  
7 *v. Joseph R. Biden, Jr.*, Case No. 3:22-CV-01213 at 154, U.S. Dist. Ct., Western District  
8 Of Louisiana (2023). Upon information and belief, the role of our judiciary in the creation  
9 of a Disinformation Task Force was not a subject before that Court but courts becoming  
10 an extension of CISA would make the extent of censorship significantly more pervasive.  
11 It would in fact eliminate the constitutional separation of powers between the National  
12 Security State and our independent judiciary.<sup>7</sup>

13           The extension of the CISA censorship campaign into the Arizona  
14 judiciary via administrative powers also incorporated the SBA into the task force. Ms.  
15 Spaulding, a member of the Standing Committee on Law and National Security within the  
16 American Bar Association (“ABA”), was responsible for much of this Orwellian  
17 censorship campaign, and by inducing the Arizona Supreme Court to use its  
18 “Administrative Powers” was an effort to bring the independent Arizona judiciary under  
19 the auspices of the federal government national security state and censor attorney speech  
20 and willingness to bring claims on behalf of legitimate clients on any issue involving what  
21 the Ministry of Truth was labeling disinformation.<sup>8</sup> In fact, Ms. Spaulding central focus

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23 <sup>7</sup> Had Ms. Spaulding and her allies sought legitimate restraints on speech, they would have  
24 followed the normal constitutional process and sought to have the legislature pass a law  
25 proscribing the publication of “Russian Disinformation”. The judiciary would then have  
26 been called upon to determine the legitimacy of such a proscription in an actual  
controversy and weighed the evidence in an adversarial proceeding. By convincing Courts  
to issue similar proscriptions on speech through the use of administrative powers achieved  
a similar goal but in an unconstitutional process.

27 <sup>8</sup> An example of Ms. Spaulding’s abuse of power on behalf of partisan ends can be found  
28 in her attacks on Brandon Straka, a U.S. citizen and founder of “The Walk Away  
Movement” and the #WalkAway hashtag. The Walk Away Movement began when Mr.  
Straka Walked Away from the Democratic Party and his movement was an expression of  
why he did so. It was also an invitation for others to share their stories as to why they are

1 appeared to be our elections. This all, of course, took place in the runup to the 2020  
2 Presidential Election.

3           It is also known that the Central Intelligence Agency (“CIA”) was a  
4 player in determining what speech constituted “disinformation.” Testimony before  
5 Congressman Jim Jordan’s committee shows that then Joe Biden Campaign Manager,  
6 Anthony Blinken, was involved with coordinating efforts of the CIA to dispel the Hunter  
7 Biden Laptop story as “Russian disinformation.” Curiously enough, the rationale for  
8 creating the Disinformation Task Force as stated by Chief Justice Brutinel was to prevent  
9 “Russian disinformation” from influencing Arizona courts. Had an Arizona attorney filed  
10 a claim related to what is now known as Hunter Biden’s laptop at that time, would that  
11 attorney have been subject to sanctions because of this predetermination or labeling of  
12 speech by the federal executive branch of government?

13           With respect to election fraud allegations, it is also widely known  
14 that prior to and after the 2020 General Election, the same pundits who were spreading  
15 “Russian disinformation” mythology were also pre-labeling claims of election fraud as  
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17 walking away from the Democratic Party. Ms. Spaulding and her censorship apparatus  
18 labeled the Walk Away Movement Russian disinformation and sought to silence the  
19 organization and its members voices. Ms. Spaulding made this claim while educating  
20 people about Russian disinformation and also raised it in “Beyond the Ballot” of which  
21 she is a primary author. Whether she used The Walk Away Movement as an example of  
22 how she educated members of the judiciary and ABA is unknown at present. Information  
23 about Mr. Straka and his Walk Away Movement can be found at:  
24 <https://x.com/BrandonStraka/status/1734724704441888956?s=20>. It stands to reason that  
25 attorneys might be hesitant to bring claims involving the #WalkAway Movement in an  
26 Arizona Court while Arizona Courts are participating in a Task Force to keep Russian  
27 Disinformation from the Courts and Ms. Spaulding’s censorship apparatus is labeling  
28 everything WalkAway “Russian Disinformation”. The role of our judiciary is to provide  
a format whereby two sides present evidence as to the truth or falsity of the matter asserted.  
This role is diminished by the presence of a Task Force aimed at limiting speech,  
especially when those urging the creation of the task force are not required to defend the  
need through the traditional adversary process. Unfortunately, the mere presence of a  
Judicial Task Force at a minimum gave the appearance that the judicial branch of  
government endorsed Ms. Spaulding’s attacks on Mr. Straka and his anti-Democratic  
Party message. In the eyes of the public, whom we need to trust the courts, it may have  
appeared that Mr. Straka was already guilty because he was defined by Ms. Spaulding and  
the National Security apparatus as a Russian provocateur. This example also shows that  
Ms. Spaulding was behaving as a pure political operative shutting down any and all speech  
related to the Democratic Party.

1 Russian disinformation. It is known that in the three-day period following the 2020  
2 General Election, almost 20,000 ballot affidavit envelopes (and their corresponding  
3 ballots) were added to the stream of ballots being counted in the system. *See* 2020 Chain  
4 of Custody Forms, Exhibit C. Was the predetermination of speech regarding our elections  
5 designed to silence any and all litigation in Arizona courts related to the introduction of  
6 approximately 20,000 ballots? It is interesting that such a litigious group of people  
7 (attorneys) failed to challenge the 2020 election based on actual fraud or to even challenge  
8 our local government's creation of censorship boards after the 2020 election.

9           The tweet at issue here is the first in a long series of tweets (which  
10 can be viewed at @blehmlawaz. It was designed to bring to light a significant public policy  
11 issue regarding our judiciary and it's interactions with the national security branch of the  
12 federal executive department that requires public debate (not just Arizona but nationally  
13 as Ms. Spaulding had similar influence in other jurisdictions including the federal courts).  
14 It is a constitutional issue that raises grave concerns for our system of checks and balances  
15 and the separation of powers inherent in our constitutional system. The issue I am bringing  
16 to light and my tweets have never stated that the judiciary or any member thereof is  
17 involved in fraud, deceit, or is overtly acting in a political manner. However, my tweets  
18 aim to make clear that this new age of McCarthyism stands to the detriment of our judicial  
19 system if it is viewed as participating in the political persecution and censorship of views  
20 in opposition to those defining speech on behalf of the federal government and, in this  
21 case, the Democratic Party.

22           My tweets are aimed at increasing the public, the legal community,  
23 and the judiciary's awareness to efforts to politicize the courts by bringing them in line  
24 with those entities of the federal government who tasked themselves with labeling speech  
25 and eliminating that speech they deem offensive. If our courts are to remain a-political (as  
26 they should), they must be aware of the efforts made to encroach upon their independence.  
27 Creating task forces targeting certain speech on behalf of those intimately involved in  
28 political censorship has the effect of restraining attorney willingness to litigate related





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# **EXHIBIT A**

# MC INBOUND - RECEIPT OF DELIVERY

1389  
ELECTION

10-13-22  
DATE RECEIVED FROM MC

BRANDON  
RES EMPLOYEE

7:35  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND				
REGULAR MOB				
OUT OF SPEC				
NEED PACKET	1	60	YES	TS147003 TS147004
BLUE ENVELOPES				
LATES				
CTR	1	159	Y	TS147230 TS147229

## CUSTODY EXCHANGE

10/13/22  
DATE

Oscar Miranda  
COUNTY RECEIVED

10-13-22  
DATE

Ruben Smith  
RES WITNESS

10/13/22  
DATE

Tomie TST  
WITNESS



# MC INBOUND - RECEIPT OF DELIVERY

1389

ELECTION

10 / 14

DATE RECEIVED FROM MC

Ricardo Ramos

RES EMPLOYEE

8:03 AM

TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	1	13	/	/
REGULAR MOB	1	7	/	
OUT OF SPEC				
NEED PACKET	1	10	Y	15147005 / 15147006
BLUE ENVELOPES				
LATES				
CTR	1	2SA	/	

## CUSTODY EXCHANGE

10/14/22  
DATE

Oscar Miranda  
COUNTY RECEIVED

10/14  
DATE

Ricardo Ramos  
RES WITNESS

10/14/22  
DATE

Diana T. Ste...  
WITNESS



# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
  
Ramos  
 RES EMPLOYEE

10/18  
 DATE RECEIVED FROM MC  
  
6:47 AM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	84x400	33,600		
REGULAR MOB	1	599		
OUT OF SPEC				
NEED PACKET	1	13	Y	15439988 / 15439987
BLUE ENVELOPES				
LATES				
CTR	1	281	/	

## CUSTODY EXCHANGE

10/18/22  
 DATE

Oscar Miranda  
 COUNTY RECEIVED

10/18  
 DATE

R. Ramos  
 RES WITNESS

10/18/22  
 DATE

[Signature]  
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
ELECTION

10/19  
DATE RECEIVED FROM MC

Ramos  
RES EMPLOYEE

6:40 A.M  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	102 x 350	35,700	—	—
REGULAR MOB	1	1143	—	—
OUT OF SPEC				
NEED PACKET	1	91	Y	15439985 / 15439986
BLUE ENVELOPES				
LATES				
CTR	1	273	—	—

## CUSTODY EXCHANGE

10/19/22  
DATE

Oscar Miranda  
COUNTY RECEIVED

10/19  
DATE

Ramos  
RES WITNESS

10/19  
DATE

vt Viller  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
ELECTION

10/19  
DATE RECEIVED FROM MC

Ramos  
RES EMPLOYEE

5:10 PM  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	1	350	—	—
REGULAR MOB	3	1806	—	—
OUT OF SPEC				
NEED PACKET				
BLUE ENVELOPES				
LATES				
CTR	1	274	—	—

## CUSTODY EXCHANGE

10/19/22  
DATE

Oscar Miranda  
COUNTY RECEIVED

10/19  
DATE

Ramos  
RES WITNESS

10/19/22  
DATE

[Signature]  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
  
Ramos  
 RES EMPLOYEE

10/20  
 DATE RECEIVED FROM MC  
  
AM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO
POST OFFICE INBOUND	111 x 350	38,850	/
REGULAR MOB			
OUT OF SPEC			
NEED PACKET	1	162	Y
BLUE ENVELOPES			
LATES			
CTR			

15439984 / 15439983

## CUSTODY EXCHANGE

10/20/22  
 DATE

*Oscar ...*  
 COUNTY RECEIVED

10/20  
 DATE

Ramos  
 RES WITNESS

10/20/22  
 DATE

*...*  
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
ELECTION

10/20  
DATE RECEIVED FROM MC

Ramos  
RES EMPLOYEE

5:50 AM  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	1	100	—	—
REGULAR MOB	4	2213	—	—
OUT OF SPEC				
NEED PACKET	1	89	Y	15439981 / 15439982
BLUE ENVELOPES				
LATES				
CTR	1	339	—	—

## CUSTODY EXCHANGE

10/20/22  
DATE

*Osca Miranda*  
COUNTY RECEIVED

10/20  
DATE

Ramos  
RES WITNESS

10/20/22  
DATE

*Derek T. [Signature]*  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
  
Ramos  
 RES EMPLOYEE

10/21  
 DATE RECEIVED FROM MC  
  
6:37 AM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO
POST OFFICE INBOUND	92 x 350	32,200	—
REGULAR MOB			
OUT OF SPEC			
NEED PACKET	1	52	Y
BLUE ENVELOPES			
LATES			
CTR			

15439947 / 15439948

## CUSTODY EXCHANGE

10/21/22  
 DATE

Oscar Miranda  
 COUNTY RECEIVED

10/21  
 DATE

Ramos  
 RES WITNESS

10/21  
 DATE

V.A. Valles  
 WITNESS



# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
  
Ramos  
 RES EMPLOYEE

10/21  
 DATE RECEIVED FROM MC  
  
5:19 PM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO
POST OFFICE INBOUND			
REGULAR MOB	2	1793	—
OUT OF SPEC			
NEED PACKET			
BLUE ENVELOPES			
LATES			
CTR	1	268	—

## CUSTODY EXCHANGE

10/21/22  
 DATE  
  
10/21  
 DATE  
  
10/21  
 DATE

*Osca Miranda*  
 COUNTY RECEIVED  
  
Ramos  
 RES WITNESS  
  
*JA Valler*  
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
ELECTION

10/22/22  
DATE RECEIVED FROM MC

*Jennie*  
RES EMPLOYEE

10:05  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	138	48,000	NO	
REGULAR MOB				
OUT OF SPEC				
NEED PACKET	1	263	yes	IS 439941 IS 439942
BLUE ENVELOPES				
LATES				
CTR				

## CUSTODY EXCHANGE

\_\_\_\_\_  
DATE

10/22/22  
DATE

\_\_\_\_\_  
DATE

\_\_\_\_\_  
COUNTY RECEIVED

*Jennie Mason*  
RES WITNESS

\_\_\_\_\_  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
  
Ramos  
 RES EMPLOYEE

10/24  
 DATE RECEIVED FROM MC  
  
6:50 AM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	87 x 350	28,700	—	—
REGULAR MOB				
OUT OF SPEC				
NEED PACKET				
BLUE ENVELOPES				
LATES				
CTR				

## CUSTODY EXCHANGE

10/24/22  
 DATE

Oscar Miranda  
 COUNTY RECEIVED

10/24  
 DATE

Ramos  
 RES WITNESS

10/24/22  
 DATE

JA Valles  
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
ELECTION

10/24/22  
DATE RECEIVED FROM MC

Ramos  
RES EMPLOYEE

6 25 PM  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO
POST OFFICE INBOUND			
REGULAR MOB	10	5,791	
OUT OF SPEC			
NEED PACKET	1	203	Y
BLUE ENVELOPES			
LATES			
CTR	2	500	N

15439945

## CUSTODY EXCHANGE

10/24/22  
DATE

*[Signature]*  
COUNTY RECEIVED

10/24/22  
DATE

Ramos  
RES WITNESS

10/24/22  
DATE

*[Signature]*  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
Ramos  
 RES EMPLOYEE

10/25  
 DATE RECEIVED FROM MC  
6:39 AM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	213 x 350	74,550	—	—
REGULAR MOB				
OUT OF SPEC				
NEED PACKET	1	212	Y	15146145 / 15146146
BLUE ENVELOPES				
LATES				
CTR				

## CUSTODY EXCHANGE

10/25/22  
 DATE

*Oscar Miranda*  
 COUNTY RECEIVED

10/25  
 DATE

Ramos  
 RES WITNESS

10/25  
 DATE

*A. Vallen*  
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
  
BRANDON  
 RES EMPLOYEE

10/25  
 DATE RECEIVED FROM MC  
  
7:13  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	1	350	~	~
REGULAR MOB	9	6263	y	~
OUT OF SPEC	1	49	y	I5146143
NEED PACKET	1	313	y	I5146144 I5146141 I5146142
BLUE ENVELOPES				
LATES				
CTR	1	611	y	~

## CUSTODY EXCHANGE

10/25/22  
 DATE  
  
10/25  
 DATE  
  
10/25/22  
 DATE

*Debra Miranda*  
 COUNTY RECEIVED  
  
*Rhr*  
 RES WITNESS  
  
*[Signature]*  
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
  
Ramos  
 RES EMPLOYEE

10/26  
 DATE RECEIVED FROM MC  
  
6:38 AM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO
POST OFFICE INBOUND	159x350	55,650	—
REGULAR MOB			
OUT OF SPEC			
NEED PACKET			
BLUE ENVELOPES			
LATES			
CTR			

## CUSTODY EXCHANGE

10/26/22  
 DATE

*[Signature]*  
 COUNTY RECEIVED

10/26  
 DATE

Ramos  
 RES WITNESS

10/26/22  
 DATE

*[Signature]*  
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
  
Ramos  
 RES EMPLOYEE

10/26  
 DATE RECEIVED FROM MC  
  
6:00 PM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND				
REGULAR MOB	8	5676	/	/
OUT OF SPEC				
NEED PACKET	1	434	Y	15439944 / 15439943
BLUE ENVELOPES				
LATES				
CTR	1	621	/	/

## CUSTODY EXCHANGE

10/26/22  
 DATE  
  
10/26  
 DATE  
  
10/26/22  
 DATE

Oscar Miranda  
 COUNTY RECEIVED  
  
Ramos  
 RES WITNESS  
  
[Signature]  
 WITNESS



# MC INBOUND - RECEIPT OF DELIVERY

1389

ELECTION

10/27

DATE RECEIVED FROM MC

Ramos

RES EMPLOYEE

6:43 AM

TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	126x350	44,100		
REGULAR MOB				
OUT OF SPEC				
NEED PACKET				
BLUE ENVELOPES				
LATES				
CTR				

## CUSTODY EXCHANGE

10/27/22  
DATE

*Osiris Alvarado*  
COUNTY RECEIVED

10/27  
DATE

Ramos  
RES WITNESS

10/27/22  
DATE

*Derek T. [Signature]*  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
ELECTION

ANDY  
RES EMPLOYEE

10/27/22  
DATE RECEIVED FROM MC

7:00 pm  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO
POST OFFICE INBOUND	2@400	800	N
REGULAR MOB	8	5356	-
OUT OF SPEC			
NEED PACKET			
BLUE ENVELOPES			
LATES			
CTR	1	561	

## CUSTODY EXCHANGE

10/27/22  
DATE

Oscar Miranda  
COUNTY RECEIVED

10/27/22  
DATE

[Signature]  
RES WITNESS

10/27/22  
DATE

[Signature] SEAN PAGE  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
Ricardo Ramos  
 RES EMPLOYEE

10/28  
 DATE RECEIVED FROM MC  
6:39 AM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	141x350	49,360	/	/
REGULAR MOB				
OUT OF SPEC				
NEED PACKET	2	545	Y	151634895/15163489 151634898/15145195
BLUE ENVELOPES				
LATES				
CTR				

## CUSTODY EXCHANGE

10/28  
 DATE

Oscar Miranda  
 COUNTY RECEIVED

10/28  
 DATE

Ricardo Ramos  
 RES WITNESS

10/28/22  
 DATE

[Signature]  
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1989  
ELECTION

ANDY  
RES EMPLOYEE

10/28/22  
DATE RECEIVED FROM MC

1:30pm  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND				
REGULAR MOB	1	639	✓	—
OUT OF SPEC	2	1		
NEED PACKET	1	406	✓	15180281 15150684
BLUE ENVELOPES				
LATES				
CTR	2	145	✓	—

## CUSTODY EXCHANGE

10/28/22  
DATE

Oscar Miranda  
COUNTY RECEIVED

10/28/22  
DATE

[Signature]  
RES WITNESS

10/08/22  
DATE

[Signature]  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389

ELECTION

10/29

DATE RECEIVED FROM MC

Ricardo Ramos

RES EMPLOYEE

11:37 AM

TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	123x350	43,050	—	—
REGULAR MOB				
OUT OF SPEC				
NEED PACKET				
BLUE ENVELOPES				
LATES				
CTR				

## CUSTODY EXCHANGE

10/29/22  
DATE

Oscar Ricardo  
COUNTY RECEIVED

10/29  
DATE

Ricardo Ramos  
RES WITNESS

10/29/22  
DATE

[Signature]  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

11389  
 ELECTION  
Ricardo Ramos  
 RES EMPLOYEE

10/31  
 DATE RECEIVED FROM MC  
6:54 AM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO
POST OFFICE INBOUND	96x350	33,600	—
REGULAR MOB	8	5,281	—
OUT OF SPEC			
NEED PACKET	1	194	Y
BLUE ENVELOPES			
LATES			
CTR	3	1639	—

15150683 / 15150682

## CUSTODY EXCHANGE

10/31/22  
 DATE

Oscar Miranda  
 COUNTY RECEIVED

10/31  
 DATE

Ricardo Ramos  
 RES WITNESS

10/31/22  
 DATE

[Signature]  
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
  
ANDY  
 RES EMPLOYEE

10/31/22  
 DATE RECEIVED FROM MC  
  
7 50 PM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO
POST OFFICE INBOUND	1 @ 350	250	✓
REGULAR MOB	20	13,765	✓
OUT OF SPEC			
NEED PACKET			
BLUE ENVELOPES			
LATES			
CTR	2	2,082	✓

## CUSTODY EXCHANGE

10/31/22  
 DATE

Oscar Miranda  
 COUNTY RECEIVED

10/31/22  
 DATE

[Signature]  
 RES WITNESS

10/31/22  
 DATE

[Signature]  
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
Ricardo Ramos  
 RES EMPLOYEE

11/1  
 DATE RECEIVED FROM MC  
7:00 AM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	258 x 350	90,300	—	—
REGULAR MOB				
OUT OF SPEC				
NEED PACKET	1	938	✓	15437043 / 15147641
BLUE ENVELOPES				
LATES				
CTR				

## CUSTODY EXCHANGE

11/01/22  
 DATE

11/1  
 DATE

11/01  
 DATE

Osceola Miranda  
 COUNTY RECEIVED

Ricardo Ramos  
 RES WITNESS

A. Valles  
 WITNESS



# MC INBOUND - RECEIPT OF DELIVERY

1789  
ELECTION

11/1/22  
DATE RECEIVED FROM MC

ANDY  
RES EMPLOYEE

7:30 PM  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND				
REGULAR MOB	2	10,086	N	—
OUT OF SPEC	1	50		51211-10000-5
NEED PACKET	1	370	Y	101107647-10101043
BLUE ENVELOPES				
LATES				
CTR	4	2,759	N	—

## CUSTODY EXCHANGE

11/01/22  
DATE

*Oscar Miranda*  
COUNTY RECEIVED

11/1/22  
DATE

*[Signature]*  
RES WITNESS

11/01/22  
DATE

*[Signature]*  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
ELECTION

11/02  
DATE RECEIVED FROM MC

Ricardo Ramos  
RES EMPLOYEE

6:35 AM  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	180x400	72,000	/	/
REGULAR MOB				
OUT OF SPEC				
NEED PACKET	1	186	Y	15149650 / 15149649
BLUE ENVELOPES				
LATES				
CTR				

## CUSTODY EXCHANGE

11/02/22  
DATE

Oscar Macinda  
COUNTY RECEIVED

11/02  
DATE

Ricardo Ramos  
RES WITNESS

11/2/22  
DATE

[Signature]  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
ELECTION

11-2-22  
DATE RECEIVED FROM MC

ADRIAN G.  
RES EMPLOYEE

7:20 pm  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND				
REGULAR MOB	25	16,640	N	—
OUT OF SPEC				
NEED PACKET	1	720	Y	15149646 15149647
BLUE ENVELOPES				
LATES				
CTR	5	3,084	N	—

## CUSTODY EXCHANGE

11/02/22  
DATE

*Oscar Miranda*  
COUNTY RECEIVED

11/2/22  
DATE

*[Signature]*  
RES WITNESS

11/2/22  
DATE

*[Signature]*  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
Ricardo Ramos  
 RES EMPLOYEE

11/03  
 DATE RECEIVED FROM MC  
6:58 AM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	76 x 400	30,400	—	—
REGULAR MOB				
OUT OF SPEC				
NEED PACKET				
BLUE ENVELOPES				
LATES				
CTR				

## CUSTODY EXCHANGE

11/03/22  
 DATE

11/03  
 DATE

11/03  
 DATE

Oscar Miranda  
 COUNTY RECEIVED

Ricardo Ramos  
 RES WITNESS

et Valles  
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
  
ANDY  
 RES EMPLOYEE

11/3/22  
 DATE RECEIVED FROM MC  
  
7:00 PM  
 TIME


TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND				
REGULAR MOB	35	15,018	N	—
OUT OF SPEC	1	117	Y	15142514 15241212
NEED PACKET	1	520	Y	15142515 15241212
BLUE ENVELOPES				
LATES				
CTR	4	3,564	N	—

## CUSTODY EXCHANGE

11/03/22  
 DATE

  
 COUNTY RECEIVED

11/3/22  
 DATE

  
 RES WITNESS

11/03/22  
 DATE

  
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
Ricardo Ramos  
 RES EMPLOYEE

11/04  
 DATE RECEIVED FROM MC  
7:00 AM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO
POST OFFICE INBOUND	34 x 400	13600	—
REGULAR MOB			
OUT OF SPEC			
NEED PACKET	1	36	Y
BLUE ENVELOPES			
LATES			
CTR			

15148558 / 15149648

## CUSTODY EXCHANGE

11/04/22  
 DATE

*Osca Miranda*  
 COUNTY RECEIVED

11/04  
 DATE

Ricardo Ramos  
 RES WITNESS

11/04/22  
 DATE

*Trish*  
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
  
ANN  
 RES EMPLOYEE

11/4/22  
 DATE RECEIVED FROM MC  
  
7:00 PM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND				
REGULAR MOB				
OUT OF SPEC				
NEED PACKET	2			11/08/22 11:00 AM 11/08/22 11:00 AM
BLUE ENVELOPES				
LATES				
CTR	5	172		

## CUSTODY EXCHANGE

11/04/22  
 DATE

Debra Miranda  
 COUNTY RECEIVED

                      
 DATE

                      
 RES WITNESS

11/04/22  
 DATE

                      
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
Ricardo Ramos  
 RES EMPLOYEE

11/06  
 DATE RECEIVED FROM MC  
7:20 AM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	12x400	4,800	—	—
REGULAR MOB	24	14,323	—	—
OUT OF SPEC				
NEED PACKET	1	650	Y	15139861 / 15146814
BLUE ENVELOPES				
LATES				
CTR	6	5600	—	—

## CUSTODY EXCHANGE

11/06/22  
 DATE

Oscar Alvarado  
 COUNTY RECEIVED

11/06  
 DATE

Ricardo Ramos  
 RES WITNESS

11/06/22  
 DATE

[Signature]  
 WITNESS



# MC INBOUND - RECEIPT OF DELIVERY

1389  
 ELECTION  
Ricardo Ramos  
 RES EMPLOYEE

11/07  
 DATE RECEIVED FROM MC  
6:38 AM  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	4 x 400	1600	/	/
REGULAR MOB	5	3020	/	/
OUT OF SPEC				
NEED PACKET	1	756	Y	15439863 / 15439862
BLUE ENVELOPES				
LATES				
CTR				

## CUSTODY EXCHANGE

11/07/22  
 DATE

[Signature]  
 COUNTY RECEIVED

11/07  
 DATE

Ricardo Ramos  
 RES WITNESS

11/07/22  
 DATE

[Signature]  
 WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

ELECTION Day 1389

ELECTION

11/08  
DATE RECEIVED FROM MC

Ricardo Ramos  
RES EMPLOYEE

6:47 AM  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	14x400	5600	—	—
REGULAR MOB	46	33994	—	—
OUT OF SPEC				
NEED PACKET	2	1041	Y	15439865/15439869 15439881/15439887
BLUE ENVELOPES				
LATES				
CTR	16	7844	—	—

## CUSTODY EXCHANGE

11/08/22  
DATE

Oscar Miranda  
COUNTY RECEIVED

7:00 AM

11/08 6:53 AM  
DATE

Ricardo Ramos  
RES WITNESS

11/08  
DATE

A. Valler 6:54 AM  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389

ELECTION

11/18/22

DATE RECEIVED FROM MC

ANDY

RES EMPLOYEE

7:15pm

TIME

*[Handwritten signature]*  
12/18/22

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO
POST OFFICE INBOUND			
REGULAR MOB			
OUT OF SPEC			
NEED PACKET			
BLUE ENVELOPES			
LATES			
CTR			
Election Night	5@350	1,750	N

11/08/2022 9:24pm *[Signature]*  
11/08/2022 9:33 *[Signature]*

## CUSTODY EXCHANGE

11/08/22  
DATE

*[Signature]* 10:00 AM  
COUNTY RECEIVED

11/18/22  
DATE

*[Signature]* 7:15pm  
RES WITNESS

11/08/22  
DATE

*[Signature]* 1:00 PM  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
ELECTION

11/8/22  
DATE RECEIVED FROM MC

ANDY  
RES EMPLOYEE

10:00 pm  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND				
REGULAR MOB				
OUT OF SPEC				
NEED PACKET				
BLUE ENVELOPES				
LATES				
CTR				
Election Night	27 @ 350	9,450	N	—

*Handwritten notes:*  
 Applied to 11/8/22  
 Res Handed 11/2/2022

## CUSTODY EXCHANGE

11/08/22  
DATE

Oscar Miranda 10:00 P.M.  
COUNTY RECEIVED

11/8/22 10:00 P.M.  
DATE

[Signature]  
RES WITNESS

11/08/22  
DATE

[Signature]  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389

ELECTION

11/8/22 11:43 PM

DATE RECEIVED FROM MC

ANDY

RES EMPLOYEE

11:43 PM

TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO
POST OFFICE INBOUND	9		
REGULAR MOB			
OUT OF SPEC			
NEED PACKET			
BLUE ENVELOPES			
LATES			
CTR			
Election Night	81@350	28,350	N
			—

H. M. Quinn 11/08/2022  
 Ken Habel 11/08/2022

## CUSTODY EXCHANGE

11/08/22

DATE

Oscar Miranda

COUNTY RECEIVED

11/8/22 11:45 PM

DATE

[Signature]

RES WITNESS

11/08/22

DATE

[Signature]

WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
ELECTION

11/9/22  
DATE RECEIVED FROM MC

ANDY  
RES EMPLOYEE

4.43 am  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND				
REGULAR MOB				
OUT OF SPEC				
NEED PACKET				
BLUE ENVELOPES				
LATES				
CTR				
Election night	105@350	36,750	N	—

*[Signature]* 11/09/22  
*[Signature]* 11/09/2022

## CUSTODY EXCHANGE

11/09/22  
DATE

*Oscar Miranda*  
COUNTY RECEIVED

11/9/22 4:45am  
DATE

*[Signature]*  
RES WITNESS

11/09/22 4:45AM  
DATE

*[Signature]*  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389

ELECTION

11/9/22

DATE RECEIVED FROM MC

ANDY

RES EMPLOYEE

1 43 AM

TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND				
REGULAR MOB				
OUT OF SPEC				
NEED PACKET				
BLUE ENVELOPES				
LATES				
OR				
11/9/22 on night	186 @ 350	65,100	N	—

11/09/2022  
 Andy ...

## CUSTODY EXCHANGE

11/08/22

DATE

1:45 AM  
 COUNTY RECEIVED

11/9/22 1:45 AM

DATE

RES WITNESS

11/09/22 01:45 AM

DATE

WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389

ELECTION

11/9/22

DATE RECEIVED FROM MC

ANDY

RES EMPLOYEE

3:27 AM

TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND				
REGULAR MOB				
OUT OF SPEC				
NEED PACKET				
BLUE ENVELOPES				
LATES				
CTR				
Election night	210@350	73,500	N	—

*[Signature]* = 11/09/2022

See Included 11/09/2022

## CUSTODY EXCHANGE

11/09/22  
DATE

*[Signature]*  
COUNTY RECEIVED

11/9/22 3:27am  
DATE

*[Signature]*  
RES WITNESS

11/9/22 3:27AM  
DATE

*[Signature]*  
WITNESS



# MC INBOUND - RECEIPT OF DELIVERY

LATES

-1389  
ELECTION

11-9  
DATE RECEIVED FROM MC

BRANDON  
RES EMPLOYEE

2:28 PM  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND				
REGULAR MOB				
OUT OF SPEC				
NEED PACKET				
BLUE ENVELOPES				
LATES	1	184	~	~
CTR				

## CUSTODY EXCHANGE

11/9/22  
DATE

Oscar Miranda 2:43 pm  
COUNTY RECEIVED

11-9 2:28 PM  
DATE

Brandon Sanchez  
RES WITNESS

11/9/22 2:45 pm  
DATE

Duke T. Star  
WITNESS

# MC INBOUND - RECEIPT OF DELIVERY

1389  
ELECTION

11/11/2022  
DATE RECEIVED FROM MC

*[Signature]*  
RES EMPLOYEE

7:22  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO
POST OFFICE INBOUND			
REGULAR MOB			
OUT OF SPEC			
NEED PACKET	<del>287</del> 1	287	YES
BLUE ENVELOPES			
LATES			
CTR			

75439868  
75439869

## CUSTODY EXCHANGE

11/11/22  
DATE

Oscar Miranda 7:35 AM  
COUNTY RECEIVED

11/11/2022 7:22  
DATE

*[Signature]*  
RES WITNESS

11/11/22  
DATE

A Valles 7:29 AM  
WITNESS

**TABLE 1****Table of MC Inbound Receipt of Delivery Forms**

(Defense Trial Exhibit 82)

Exhibit	Date	Time	Post Office	MOB	CTR	Misc	Election Day	Late	TOTAL
Hobbs 89	13-Oct	7:35AM	-	-	159	60			219
Hobbs 90	14-Oct	8:03AM	13	7	254	10			284
Hobbs 91	17-Oct	8:05AM	5,250	4	221	7			5,482
Hobbs 92	18-Oct	6:47AM	33,600	599	281	13			34,493
Hobbs 93	19-Oct	6:40AM	35,700	1,143	273	41			37,157
Hobbs 94	19-Oct	5:10PM	350	1,806	274	-			2,430
Hobbs 95	20-Oct	7:00AM	38,850	-	-	162			39,012
Hobbs 96	20-Oct	5:50PM	100	2,213	339	89			2,741
Hobbs 97	21-Oct	6:37AM	32,200	-	-	52			32,252
Hobbs 98	21-Oct	5:19PM	-	1,793	268	-			2,061
Hobbs 99	22-Oct	10:05AM	48,000	-	-	263			48,263
Hobbs 100	24-Oct	6:50AM	28,700	-	-	-			28,700
Hobbs 101	24-Oct	6:25PM	-	5,791	500	203			6,494
Hobbs 102	25-Oct	6:39AM	74,550	-	-	212			74,762
Hobbs 103	25-Oct	7:13NN	350	6,263	611	362			7,586
Hobbs 104	26-Oct	6:38AM	55,650	-	-	-			55,650
Hobbs 105	26-Oct	6:00PM	-	5,676	621	434			6,731
Hobbs 106	27-Oct	6:43AM	44,100	-	-	-			44,100
Hobbs 107	27-Oct	7:00PM	800	5,356	561	-			6,717
Hobbs 108	28-Oct	6:39AM	49,360	-	-	545			49,905
Hobbs 109	28-Oct	6:50PM	-	6,539	1,452	406			8,397
Hobbs 110	29-Oct	11:37AM	43,050	-	-	-			43,050
Hobbs 111	31-Oct	6:54AM	33,600	5,281	1,639	194			40,714
Hobbs 112	31-Oct	7:50PM	350	13,765	2,082	-			16,197
Hobbs 113	1-Nov	7:00AM	90,300	-	-	938			91,238
Hobbs 114	1-Nov	7:05PM	-	16,086	2,759	450			19,295
Hobbs 115	2-Nov	6:35AM	72,000	-	-	186			72,186
Hobbs 116	2-Nov	7:20PM	-	16,640	3,084	720			20,444
Hobbs 117	3-Nov	6:58AM	30,400	-	-	-			30,400
Hobbs 118	3-Nov	7:00PM	-	15,013	3,564	637			19,214
Hobbs 119	4-Nov	7:00AM	13,600	-	-	36			13,636
Hobbs 120	4-Nov	7:00PM	-	14,451	4,729	1,099			20,279
Hobbs 121	6-Nov	7:20AM	4,800	14,323	5,600	650			25,373
Hobbs 122	7-Nov	6:38AM	1,600	3,020	-	756			5,376
Hobbs 123	8-Nov	6:47AM	5,600	33,994	7,844	1,041	-		48,479
Hobbs 124	8-Nov	7:15PM	-	-	-	-	1,750		1,750
Hobbs 125	8-Nov	10:00PM	-	-	-	-	9,450		9,450
Hobbs 126	8-Nov	11:43PM	-	-	-	-	28,350		28,350
Hobbs 128	9-Nov	1:43AM	-	-	-	-	65,100		65,100
Hobbs 129	9-Nov	3:27AM	-	-	-	-	73,500		73,500
Hobbs 127	9-Nov	4:43AM	-	-	-	-	36,750		36,750
Hobbs 130	9-Nov	2:28PM	-	-	-	-	-	184	184
Hobbs 131	11-Nov	7:22AM	-	-	-	287	-	-	287

**263,379**

**TABLE 2**

Comparison of MC Inbound Receipt of Delivery to MC Incoming Scan Receipts  
 Defense Trial Exhibits 82 (November 8-9, 2022) -- Trial Exhibit 33

MC Inbound Receipt of Delivery								MC Incoming Scan Receipt			
Exhibit	Date	Time	USPS	MOB	CTR	MISC	Total	Date	Early <sup>2</sup>	Provis.	Exhibit
Hobbs 123	8-Nov	6:47AM <sup>1</sup>	5,600	33,994	7,844	1,041	<b>48,479</b>	8-Nov	1,675	0	Hobbs 159
Hobbs 124	8-Nov	7:15PM	Election Day				<b>1,750</b>	8-Nov	10,056	0	Hobbs 160
Hobbs 125	8-Nov	10:00PM	Election Day				<b>9,450</b>	8-Nov	3,244	248	Hobbs 161
Hobbs 126	8-Nov	11:43PM	Election Day				<b>28,350</b>	9-Nov	9,945	0	Hobbs 133
Hobbs 128	9-Nov	1:43AM	Election Day				<b>65,100</b>	9-Nov	10,486	0	Hobbs 134
Hobbs 129	9-Nov	3:27AM	Election Day				<b>73,500</b>	9-Nov	10,198	0	Hobbs 135
Hobbs 127	9-Nov	4:43AM	Election Day				<b>36,750</b>	9-Nov	9,847	0	Hobbs 136
<b>Total MC Inbound Receipt of Delivery Ballot Count 11/8</b>							<b>263,379<sup>3</sup></b>	9-Nov	10,728	0	Hobbs 137
Delivered to Runbeck on 11/8-9 <b>263,379</b> Scanned at Runbeck on 11/8-9 <b>298,942</b> <b>Discrepancy                              -35,563</b>								9-Nov	10,903	0	Hobbs 138
								9-Nov	10,231	0	Hobbs 139
								9-Nov	10,476	0	Hobbs 140
								9-Nov	10,735	2,173	Hobbs 141
								9-Nov	10,515	227	Hobbs 142
								9-Nov	10,565	240	Hobbs 143
								9-Nov	10,840	254	Hobbs 144
								9-Nov	11,149	362	Hobbs 145
								9-Nov	10,548	276	Hobbs 146
								9-Nov	10,559	294	Hobbs 147
								9-Nov	10,398	198	Hobbs 148
								9-Nov	11,087	215	Hobbs 149
								9-Nov	10,441	249	Hobbs 150
								9-Nov	10,484	248	Hobbs 151
								9-Nov	10,609	339	Hobbs 152
								9-Nov	10,544	237	Hobbs 153
								9-Nov	10,645	228	Hobbs 154
								9-Nov	10,799	327	Hobbs 155
								9-Nov	10,847	293	Hobbs 156
								9-Nov	10,839	277	Hobbs 157
	9-Nov	12,510	293	Hobbs 158							
								Early Ballots	291,903	6,978	Provisional Ballots
								<b>Total Runbeck Scan 298,942</b>			

<sup>1</sup> 6:47AM Ballot Delivery on 8-Nov contained ballots from 7-Nov and USPS but all ballots were included in the count of ballots delivered to Runbeck on 8-Nov. This is the maximum number of ballots delivered and the lowest possible discrepancy.  
<sup>2</sup> Early Ballots is the sum of all categories of early ballots on the MC Incoming Scan Receipt including all inbound scan, over, under, invalid app ID and unreadable.  
<sup>3</sup> The total of 263,379 ballots does not include the 184 Late ballots delivered to Runbeck at 2:38PM on November 9, 2022 as shown on Table 1.

**From:** Stephen Richer (MCRO) <[REDACTED]>  
**Sent:** Thursday, November 10, 2022 2:13 PM  
**To:** Rey Valenzuela (MCRO); Scott Jarrett (MCRO); Megan Gilbertson (MCRO); Matthew Roberts (MCRO); Fields Moseley (OOC)  
**Cc:** Bill Gates (BOS); Zach Schira (BOS); Darron Moffatt (MCRO); Abby Raddatz (MCRO)  
**Subject:** Ballot totals.

Unable to currently reconcile SOS listing with our estimates from yesterday.

Ours:

Friday-Sunday: 86,000  
Monday: 52,000  
Drawer 3: 17,000  
ED drop offs: 291,000  
Provisional: 8,000

= 454,000

(Minus)

Posted last night: 62,000

= 392,000

From SOS:

Remaining ballots according to SOS website: 407,664

So there's a 15,000 difference somewhere.

Thanks!

S

# **EXHIBIT B**

# Maricopa County 2022 Chain of Custody Violations

## Verity Vote

The County “has no discretion to deviate” from the requirements “established by the Legislature and in the EPM,” and any attempt by the Board to “circumvent the mandates of the EPM would be unlawful.”<sup>1</sup>

—Letter from Secretary Katie Hobbs to Cochise County, Oct. 2022

### Executive Summary

The chain of custody for drop box ballots from Maricopa County's 2022 General Election was an important issue in the *Lake v. Hobbs* Trial (CV2022-095403) that began December 21, 2022, in the Superior Court of The State of Arizona in and for the County of Maricopa.

The Arizona legislature has established laws for conducting elections. County election officials have no discretion to deviate from the laws set forth in the statutes and in the Election Procedures Manual (EPM).

Prior to the 2022 General Election, Secretary of State Hobbs admonished Cochise County that any deviation from the EPM would be unlawful. But just one month later, Hobbs chose to disregard Maricopa County's admitted deviations from the EPM and violations of law as she oversaw and certified her own election. There is no reason why Maricopa should be held to a lower standard than any other county.

- **Maricopa deviated from the EPM by not counting and recording the number of drop box ballots retrieved from each location on Election Day.** Though estimates and weigh-counts are permitted for ballots delivered and tracked through the United States Postal Service, the EPM prohibits estimates for drop box ballots. The County admitted in the *Lake* court proceedings that, on Election Day, it ignored the mandatory requirement to record the precise number of drop box ballots retrieved from each location.
- **Maricopa deviated from the EPM by failing to create an inspection board log.** The EPM has detailed requirements for Election Night board procedures. The law requires the county to create an inspection board log which identifies the precinct name, number or voting location and the number of early ballots dropped off at each polling place. Maricopa did not create this mandatory log.

- **Maricopa deviated from the EPM by transferring an unknown number of ballots without documentation.** On Election Day, Maricopa County again broke the chain of custody by failing to count the number of ballots before loading them onto multiple trucks for transfer to Runbeck. This was a violation of Arizona law because neither the drivers nor the employees at Runbeck had any records of how many ballots were loaded for delivery to Runbeck.
- **Maricopa deviated from the EPM by failing to maintain ballot chain of custody.** Comparison of the number of Election Day drop box ballots recorded as received by Runbeck to the number of drop box ballots scanned at Runbeck, reveals a discrepancy of more than 84,000 ballots.
- **Maricopa failed to produce public records and misrepresented the existence of the records during the trial. They deviated from the EPM by withholding these vital and explicitly public records.** Maricopa failed to deliver a Public Records Request for all Maricopa Receipt of Delivery forms and made it impossible to present full evidence at the Lake v Hobbs Trial. Records received six months later prove that Maricopa eliminated a specific chain of custody procedures on Election Day. The records also confirm that Runbeck scanned approximately eighty-four thousand more drop box ballot packets than they reported receiving from Maricopa County. This demonstrates the effect of the broken chain of custody.
- **Maricopa deviated from the EPM by inaccurately reporting the quantity of Election Day drop box ballots to the public, the DoS, and to the courts.** The County reported receiving approximately 292,000 drop box ballots on Election Day, however that report is inconsistent with the newly produced records. The records that were withheld show that as of Election Day, only 253,000 drop box ballots remained to be collected. The official canvass shows that Maricopa misled the public and the courts. The discrepancy of 38,672 ballots in the official canvass shows that Maricopa misled the public and the courts.

#### Drop Box Ballots

Total Reported in Final Canvass	505,756
Total Recorded on MC Delivery Receipts Through Nov 7	252,525
Maximum Possible Election Day DB Ballots	253,231
MC Reported Election Day DB Ballots*	291,903
Discrepancy	(38,672)



## Drop Box Ballot Requirements

Chain of custody is essential to transparent and trustworthy elections.<sup>2</sup> The Arizona legislature understood the need for ballot chain of custody and included that requirement in Title 16 of the Arizona Revised Statutes. The AZ Secretary of State, the Governor, and the Attorney General approved the legal chain of custody requirements for early voted ballots and articulated them in the 2019 Elections Procedures Manual (EPM).<sup>3</sup>

The legal requirement to count and record the precise number of early ballots retrieved from each individual drop box location on Election Day is repeated **three times** in the Elections Procedures Manual. The laws governing the 2022 General Election included:

- **Chapter 2: Early Voting, Section I(I)(7)**: Describes the secure drop box ballot retrieval and chain of custody procedures. **“When the secure ballot container is opened,”** the **“number of ballots inside the container shall be counted and noted on the retrieval form.”** That form must be **“traceable to its respective secure ballot container.”**
- **Chapter 9: Election Day, Section VIII(B)(2)(g)**: Restates the requirement for the counting and recording of the number of early ballots retrieved from each drop box but allows for Election Day drop box ballots to be counted and recorded at the time of retrieval at the drop box on Election Day by poll workers: **“Unless ballots are transported in a secure and sealed transport container to the central counting place to be counted there.”** The counting can be deferred only until containers arrive at the central counting place. The law is clear: drop box ballots must be counted; and the **number of ballots retrieved from each individual drop box must be recorded.**
- **Chapter 10: Central Counting Place Procedures, Section II(B)(1)**: Further requires action from the Inspection Board, **“When the ballot transfer container or alternate ballot box arrives at the central counting place,** the Inspection Board shall **break the seal** and open the ballot transfer container” and then enter on the inspection board log: **“Precinct name and/or number or voting location”** and the **“Number of early ballots dropped off at the polling place.”**

There was a clear and unambiguous legal requirement to count the number of Election Day drop box ballots retrieved from each drop box and to **record that precise number on a form traceable to each drop box location.** Counting and recording must be done at the central counting place **when the seals are removed** from the transport containers.

The specific drop box chain of custody requirements are so critical to the integrity of Arizona's elections that they are repeated three times in the EPM. Just weeks before the 2022 General Election, then Secretary of State Hobbs warned that Arizona counties had no discretion to deviate from the EPM and that any attempt to circumvent the mandates of the EPM would be unlawful.<sup>1</sup>

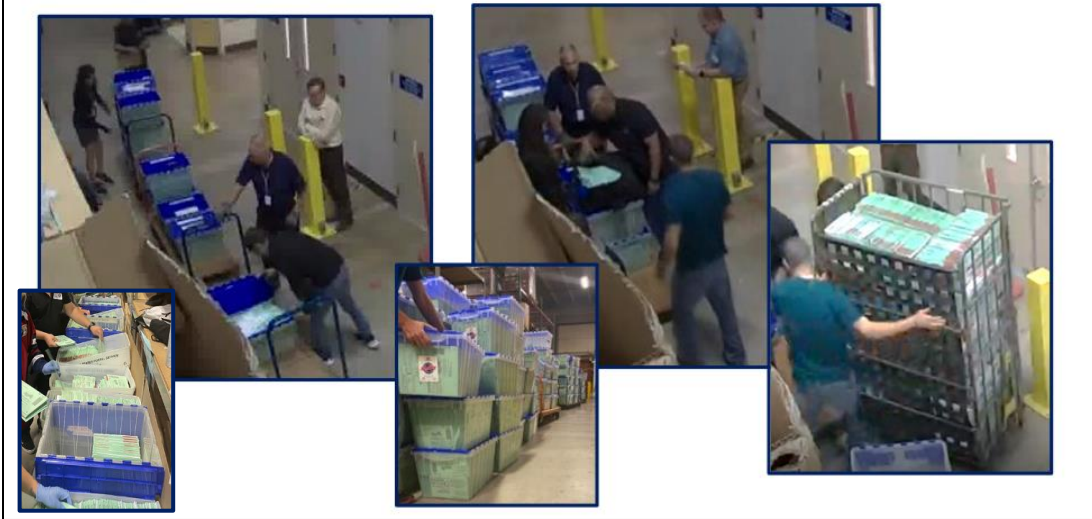
Testimony and briefs in the Lake v. Hobbs election contest confirm that Maricopa County did, in fact, deviate significantly from the EPM when they chose not to make a record of how many ballots were retrieved from each drop box location on Election Day. Rey Valenzuela testified that while they did count the drop box ballots at MCTEC and record the counts prior to election day, **they did not count the ballots retrieved from drop boxes on Election Day**. He said, "On Election Day, no, because we're not doing drop box courier process at that time. It's a different process for Election Day."<sup>4</sup>

County Recorder Stephen Richer testified that Election Day drop box ballots were not counted at MCTEC but instead, later counted at Runbeck because there were so many: "If you're talking about early ballots that are dropped off on Election Day, those come and those all come to MCTEC first where they are gathered, and then they are transferred over to Runbeck where they are counted by our people at Runbeck because they have a high-speed counter."<sup>5</sup> Richer's testimony confirms the violation of law, but the county, the SoS, and their squad of lawyers misled the court about the process and conflated the many forms generated by the complexity of outsourcing election operations to Runbeck.

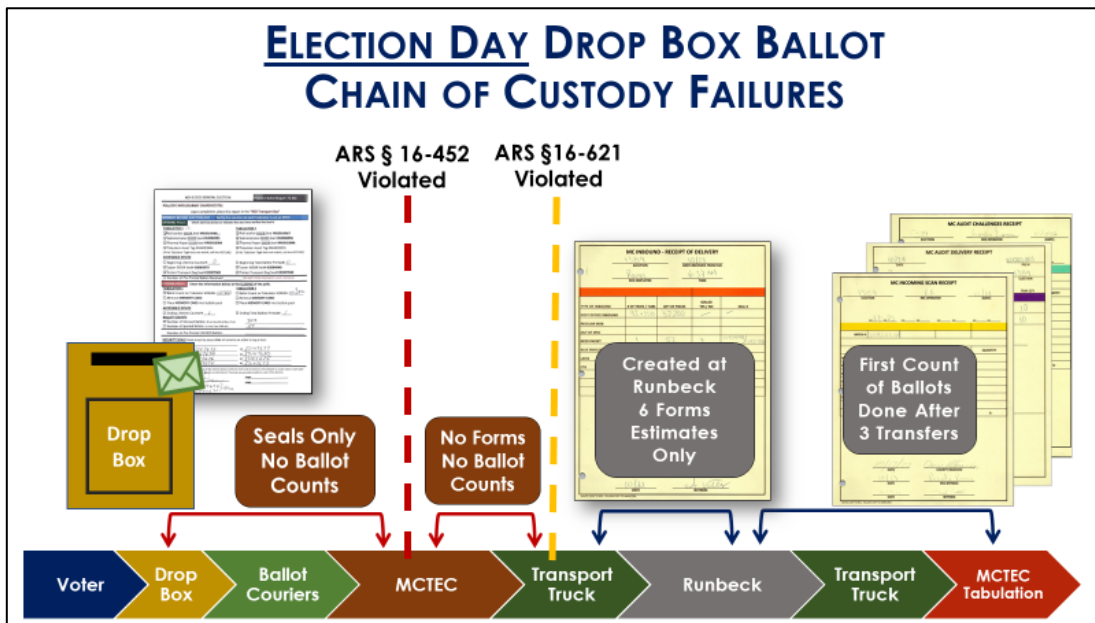
## Election Night EPM Violations

Livestreamed video from MCTEC on Election Night confirms that seals were removed, transport containers were opened, and ballots from various drop box locations were commingled and sorted into mail trays. No ballot counts were performed or recorded as large open carts of ballots were loaded onto trucks for transport to Runbeck.

## MCTEC DROP BOX BALLOT RECEIVING-ELECTION NIGHT 2022 REMOVING SEALS & COMMINGLING BUT NO COUNTING



Hobbs and Maricopa County both admitted that Election Day drop box ballots **were not counted at MCTEC**, the central counting place, when the seals were broken. This is a clear violation of the EPM and ARS §16-452.



Runbeck is an external vendor not the central counting place. The central counting place designation appears in multiple places in the law and is reserved for MCTEC. The moment **uncounted ballots** were transferred from MCTEC to Runbeck's facility, chain-of-custody was broken in violation of ARS §16-621(E).

## Failure to Complete Inspection Board Log

Arizona law requires the officer in charge of elections to provide the Inspection Board with a log to enter important data for each precinct/polling place or vote center. It is then the duty of the inspection board, when the ballot transfer container arrives at the central counting place, to break the seal, open the ballot transfer container, and enter the following information on the Inspection Board Log:

- Precinct name and/or number of the voting location
- Number of early ballots dropped off at the polling place

No Inspection Board Logs were created, and no records exist showing the number of early ballots dropped off at each voting location. In response to a Public Records Request for copies of the Inspection Board Logs, Maricopa sent copies of the Incoming Scan Receipt forms which merely document the total number of ballots scanned with no record of the origin of the ballots. The ISR does not meet any of the requirements of the Inspection Board Log.

## Misleading Statements about Ballot “Processing”

Maricopa County followed CoC law each day prior to Election Day but chose to deviate from the requirements in the EPM on Election Day. In Maricopa’s Response Brief, they attempted to create a justification for their violation of the law by extracting procedures from the processing section of the EPM. The county misrepresented the law by claiming they could substitute the USPS chain of custody requirements for drop box ballot chain of custody requirements. They wrote:

“Ballots retrieved from a ballot drop-off location or drop-box **shall be processed** in the same manner as ballots-by-mail personally delivered to the County Recorder or officer in charge of elections, dropped off at a voting location, or received via the United States Postal Service.”

Processing describes what happens after the ballots have been properly received. Notably, the County **omitted context that clearly describes the scope of this requirement and would have shown** that “processing” is related to signature verification and has nothing to do with CoC requirements which are well established elsewhere in the EPM. This attempt to create justification for their violations of the law was evident in Maricopa Response Brief:

“After the close of polls on election day, due to the large volume of early ballot packets dropped at polling places that day, the County’s chain of custody procedures are **similar to those followed for ballots received by mail.**”

The County deceived the courts by pointing to a requirement to **process** drop box ballot signature verification in the same manner as USPS ballots. Evidence of the true meaning is in the remaining portion of the EPM section which says "...or received via the United States Postal Service or any other mail delivery service, **see Chapter 2, Section VI.**" Of course, Chapter 2, Section VI of the EPM describes requirements for ballot **processing** which explicitly includes only those procedures that occur **after the ballots have been properly received** and Arizona law does require uniform **processing** of all early ballots. The section, titled Processing and Tabulating Early Ballots, describes only the actions of signature verification, removal of the ballot from the envelope and tabulation.

Arizona law appropriately has **different requirements** for chain of custody for ballots returned through the USPS. The EPM does not permit counties to disregard drop box ballot laws and replace them with different laws. Counties have no authority to deviate from the chain of custody requirements in the EPM – regardless of the number of ballots involved.

### **Ballots Transferred to New Location Without CoC**

A separate violation occurred on Election Day when ballots were transferred to a new location without any documentation. A fundamental requirement for chain of custody is a comprehensive record of all transfers. The county admitted that unsealed trays with an unknown quantity of ballots in each, were stacked on carts and loaded onto a truck. The trucks left MCTEC with an unknown quantity of ballots and arrived at Runbeck. Because there was no record of how many drop box ballots were loaded on the truck, there is no chain of custody for the ballots.

When the truck arrived at the third-party vendor facility, Runbeck employees recorded the number of trays of ballots unloaded from the truck. They lacked documentation to confirm that they were receiving the same number of trays that had been loaded onto the truck at MCTEC. Although the county had two employees at Runbeck, that is irrelevant to chain of custody with the absence of ballot counts. The first record created by anyone with an attempt to quantify the drop box ballots occurred at Runbeck on the MC Inbound Receipt of Delivery (IROD).

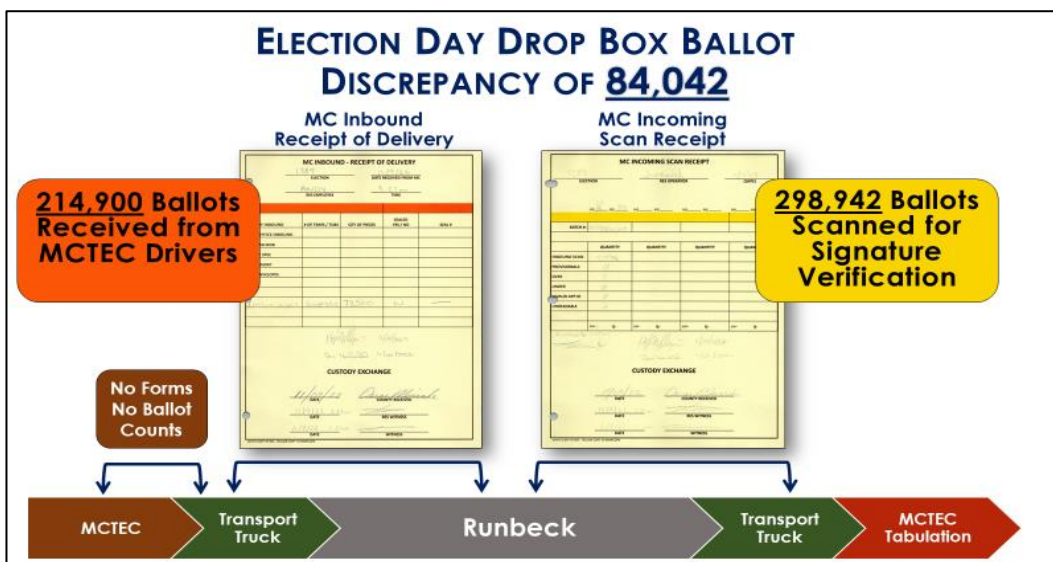
### **Election Day Drop Box Ballot Discrepancy**

Chain of custody refers to the chronological documentation, including a complete record of transfers, control and proper handling of ballots or evidence from the moment they are obtained until they are tabulated. Estimates are not consid-

ered reliable or sufficient to maintain the chain of custody in legal or formal contexts. Estimates, by their nature, involve a significant degree of uncertainty or approximation and do not provide the necessary level of accuracy or detail required for maintaining chain of custody.

On Election Day, the County created no chain of custody documents for drop box ballot counts nor did they produce any chain of custody forms with estimates at MCTEC. As a result, the first estimates documented on any forms were filled out at Runbeck after the ballots had already been transferred to the vendor's facility without proper documentation. Estimating the number of ballot envelopes scanned at Runbeck is not a legal substitution for the EPM requirement to count and record the number of drop box ballots when the transport container seals were opened at MCTEC, the central counting place.

The EPM is unambiguous, and Maricopa has no authority to deviate from the requirement established by the legislature and in the EPM. Chapters 2, 9, and 10 of the EPM all make the requirements clear. Maricopa admitted that they did not count and record the number of ballots retrieved from each drop box location on Election Day. Instead, they claim that they made a decision to disregard the law they had followed every day prior to Election Day. "Due to the large volume of early ballot packets dropped at polling places" on Election Day. Maricopa County broke the law and the chief election official in the state condoned it.

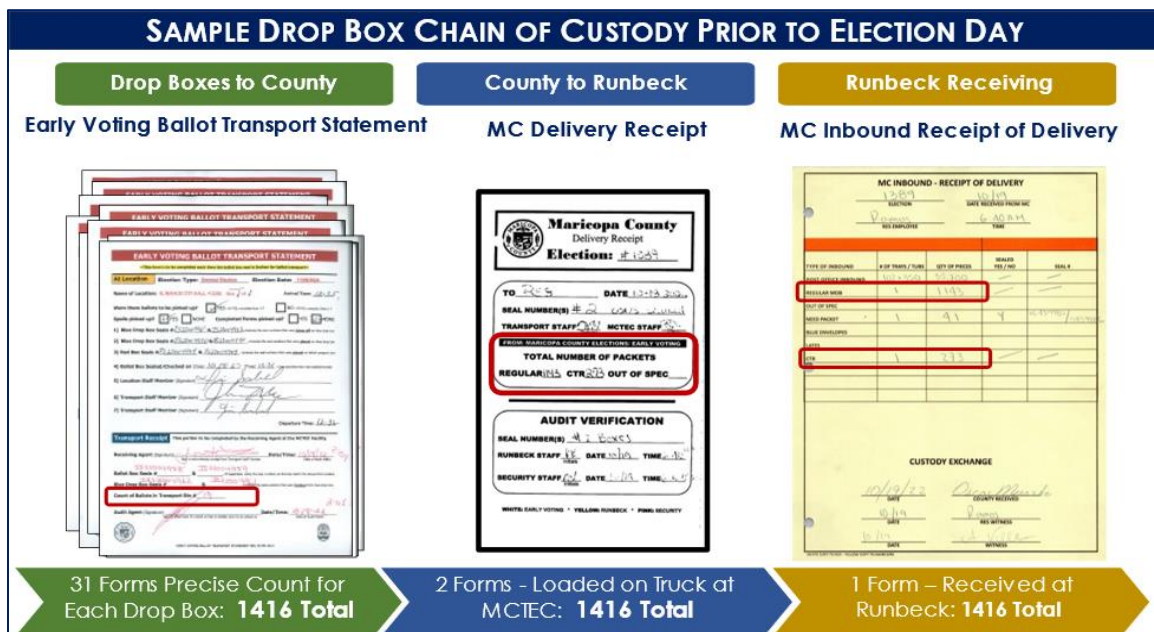


Comparison of the number of Election Day drop box ballots recorded on the MC Inbound Receipt of Delivery (IROD) forms to the number of drop box ballots scanned at Runbeck and recorded on the MC Incoming Scan Receipt (ISR) form reveals a discrepancy of more than 84,000 ballots. Runbeck scanned 84,000 more ballots than they have a record of receiving.

## Prior to Election Day

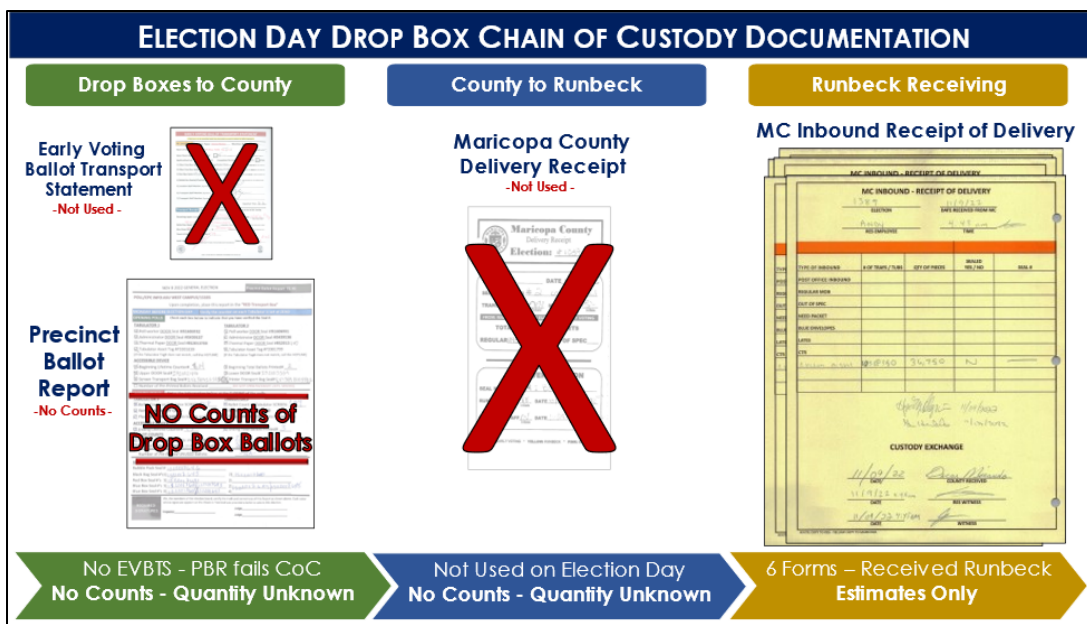
The documentation used for Chain of Custody **prior to** Election Day is shown below. The total number of ballots retrieved from each drop box location was recorded on the EVBTS which is traceable to each specific drop box location. The ballot counts from each EVBTS were summed to get the total number of ballots to be transferred to Runbeck. The precise number of regular MOB (mail out ballots) and CTRs (early in-person/counter ballots) were recorded on the Maricopa County Delivery Receipt (Delivery Receipt). When the truck arrived at Runbeck, the Runbeck Election Services (RES) employees verified the information on the Delivery Receipt and filled out the IROD form with the precise quantity of MOB and CTR ballot packets. In short, Maricopa's actions show that they understood the chain of custody requirements and were capable of following those chain of custody requirements for a significant part of the election.

In the example below, it is easy to follow the ballot packets as they move through the system. The precise quantity retrieved from each drop box was recorded on a group of EVBTS forms. There were 1416 drop box ballots counted, audited, and recorded on the EVBTS forms. That group of 1416 drop box ballots can next be seen recorded on the Delivery Receipt in order to document the number of ballots loaded onto a truck destined for Runbeck. Next, those 1416 drop box ballots can be seen on the IROD form created at Runbeck documenting the transfer of custody from the MC truck to Runbeck. Also, working backwards, the ballot packets can be reconciled back to the drop box pickups— just as the EPM requires. That demonstrates proper, lawful, chain of custody.



The county's assertion that the IROD did not include a precise number of drop box ballots received by Runbeck is belied by the chain of custody documents themselves. Just as the forms can be compared in the sample above, Verity Vote researchers reviewed the CoC documents and compared them for each day of voting in the 2022 General Election. The county's assertion is false, the precise numbers do match prior to Election Day.

The fact that Maricopa followed the law prior to Election Day shows they were well aware of the legal requirements and that the County officials chose to disregard the law for Election Day drop box ballots. Below are the documents used by Maricopa County on Election Day. This shows a significant deviation from established procedures, creating an extraordinary vulnerability.



**County Misrepresented the CoC Procedure and Conflated Forms**

County witnesses and Hobbs' Response brief conflated five distinct chain of custody forms into one interchangeable document they referred to as "the form" and "those forms." In 2022, Maricopa and Runbeck used the following five chain of custody forms:

1. Maricopa County Delivery Receipt
2. MC Inbound Receipt of Delivery
3. MC Incoming Scan Receipt
4. MC Audit Challenges Receipt
5. MC Audit Delivery Receipt



Only one of these five forms, the Maricopa County Delivery Receipt form, is generated at MCTEC. The other four forms listed above are all created at Runbeck, by Runbeck employees, after the ballots are transferred out of Maricopa County's custody into the custody of their vendor, Runbeck.

Rey Valenzuela conflated multiple chain of custody forms during his testimony. He was asked about the Inbound Receipt of Delivery Form, and he replied:

“It is, as I mentioned, the process is **called inbound scan**. It's -- this is our Maricopa County inbound receipt of delivery document that when we show up at Runbeck that we are, basically, transferring that custody, **but also it's the results of that scan** or the results of that estimate.”<sup>8</sup>

The IROD form does not include the “result of that scan.” The result of Runbeck's scan is recorded on the MC Incoming Scan Receipt form.

### **No Record of Delivery for 84,000 Ballots**

Hobbs inaccurately described the ballot transfer process and conflated the forms used by Maricopa. She claimed that, at MCTEC, county workers created an “Inbound Receipt of Delivery” (IROD) form. Hobbs claimed, “Sorted ballots are loaded into trays in secure cages, and an **estimate of ballots** is derived based on the number of trays, **consistent with the EPM's requirements to count ballots upon their arrival at MCTEC.**”<sup>13</sup> This statement is **not true because these estimates were made at Runbeck.**

The Inbound Receipt of Delivery form is a document created at Runbeck. The fact that it is created at Runbeck is evident from the IROD form fields: “Date Received from MC” and “RES Employee,” (Runbeck Election Services) signature field. Further, an estimate is not sufficient to meet the legal requirements for drop box ballot chain of custody in legal or formal contexts. Hobbs misled the court by falsely claiming that the IROD form was created at MCTEC.

It is critical to note that the “Inbound Receipt of Delivery” forms which Hobbs claimed include an “estimate of ballots” that is “consistent with the EPM's requirements to count ballots,” document only **214,000 ballots** — far short of the 298,000 ballots scanned at Runbeck. The very IROD forms that Hobbs points to as chain of custody, fail to document receipt of the other 84,000 ballots.

The second problem with Hobbs' claim is that an estimate is not a count and the EPM requires a count. The failure to document more than 84,000 ballots is a consequence of Maricopa and Hobbs' dismissal of the importance of the procedure specified in the EPM.

When Scott Jarrett was asked about the Maricopa County Delivery Receipts, he testified that “these forms” were maintained for all early ballots received on Election Day, “which are part of the record before this Court.” **This is false.** The “Maricopa County Delivery Receipt” forms were most certainly NOT part of the record before the Court. Despite numerous efforts to obtain or inspect the Delivery Receipt documents — Maricopa obstructed and claimed that they had “misplaced” the Delivery Receipts.

Finally, in June 2023, over six months after the lawful request to inspect the public records — Maricopa finally allowed inspection of a portion of the photocopies of the Delivery Receipts. The County failed to produce the documents; likely because their production proves that the County failed to use them for Election Day transfers of ballots. In fact, Maricopa followed the law prior to Election Day which shows they knew the law but chose to disregard it for Election Day drop box ballots.

The inaccurate report of ballot counts to the SoS and to the public, and Richer’s inability to reconcile<sup>9</sup> were a **manifestation of the violations of law.** The County reported the wrong number because they did not know how many ballots were received and did not even know how many ballots were transferred to a third-party vendor location. To date, the County has failed to provide a plausible explanation for this discrepancy.

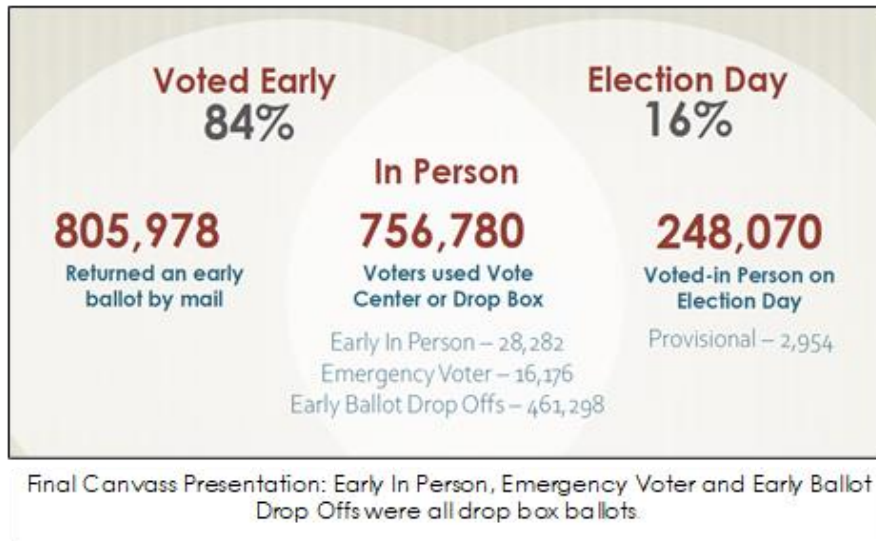
**MC Mislead the Court and the Public About the Number of ED Drop Box Ballots**

Maricopa County certified the 2022 election results reporting that 505,756 Early Ballots were returned via drop boxes.<sup>14</sup> Maricopa County repeatedly claimed that they received approximately 290,000 drop box ballots on Election Day. However, EVBTS and the previously withheld Delivery Receipts show that the county had already received 252,000 drop box ballots by November 7<sup>th</sup>. That left only 253,00 Early Ballots available for Election Day.<sup>11</sup>

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**FINAL OFFICIAL RESULTS**  
**General Election**  
**Maricopa County**  
**November 8, 2022**

Elector Group	Counting Group	Ballots	Voters	Registered Voters	Turnout
Total	EARLY VOTE	1,311,734	1,311,734	2,435,397	53.86%
	ELECTION DAY	248,070	248,070		10.19%
	PROVISIONAL	2,954	2,954		0.12%
	<b>Total</b>	<b>1,562,758</b>	<b>1,562,758</b>		<b>64.17%</b>



The Maricopa County Board of Supervisors met on November 28, 2022, to review the final canvass and certify election results. During the canvass presentation, Recorder Stephen Richer repeated the earlier reports of approximately 290,000 Election Day drop box ballots.<sup>15</sup> He said,

“Approximately 290,000 were dropped off at voting locations on Election Day. This number, 290,000, represents a significant increase in early ballot drop-offs on Election Day. Despite my best efforts to encourage people to get their early ballots back early. in November 2020 election day early ballot drop-offs totaled approximately 172,000 thousand, that's approximately 120,000 less than this year.”

Under oath in the Lake v Hobbs case, Richer confirmed the report from the Board of Supervisors that 292,000 ballots were dropped off on Election Day.

11	Q. Okay. And so the correct number, as reported at
12	least by the Maricopa County Board of Supervisors, are
13	you familiar with that as being 292,000?
14	A. That sounds right.

Richer Transcript Excerpt from Lake v Hobbs pg. 36

Review of Maricopa County’s records including the EVBTS, MC Delivery Receipts, and IROD show proper chain of custody for 252,000 drop box ballots through November 7<sup>th</sup>.<sup>16</sup>

Maricopa County claimed that nearly 292,000 Early Ballot were dropped off by voters on Election Day which is **38,000 more drop box ballots than they could have possibly received**. Receipt of 292,000 drop box ballots on Election Day would require removal of 38,000 early ballots to reconcile with certification but

Maricopa reported rejecting only 4,626 EV Ballots.<sup>10</sup> This ballot deficit is evidence of Maricopa's failure to maintain chain of custody and thus, as the EAC describes, calls the trustworthiness of the election into question.

### Maricopa County Reported Ballots

<b>Total Early Ballots Reported and Certified in the 2022 General Election</b>	<b>1,311,734</b>
<b>Total Ballots Returned through USPS</b>	<b>805,978</b>
<b>Total Number of Early Ballots Returned in Drop Box (EIP and MOB)</b>	<b>505,756</b>
<b>Total Ballots Recorded on MC Delivery Receipts Through 11/6/2022</b>	<b>209,646</b>
<b>Drop Box Ballots Retrieved on 11/7 (EVBTS and IROD)</b>	<b>42,879</b>
<b>Maximum Possible Number of Election Day Drop Box Ballots</b>	<b>253,231</b>
<b>MC Reported Election Day Drop Box</b>	<b>291,903</b>
<b>Discrepancy</b>	<b>(38,672)</b>

## Conclusion

Maricopa officials made numerous admissions in the aftermath of the 2022 General Election, and they made them under oath. First, they admitted that they did not count or record the number of drop box ballots retrieved from drop boxes on Election Day. Second, they admitted to commingling the drop box ballots at the Central Counting Place on Election Day, destroying traceability to the location where voters deposited their ballots and entrusted them to the County. Third, they did not count and record the number of ballots loaded onto trucks for transfer to their vendor. All of these admissions prove violations of Arizona law.

On Election Day, unsecured trays of unknown quantities of ballots were delivered to a third party vendor, Runbeck, without any records of how many ballots had been loaded on the trucks. Runbeck recorded receipt of 214,000 Election Day early ballots but other documents record the inbound scan of 298,000 early ballots. Even the vendor's records do not reconcile. This failure to follow the EPM requirements for ballot chain of custody led to a loss of control of the process and Maricopa's inability to accurately determine how many drop box ballots had been dropped off on Election Day.

Evidence clearly shows that Maricopa County has no records of where the reported 292,000 Election Day drop box ballots came from because they chose to disregard Arizona law on Election Day. In fact, the 292,000 ballots reported is not possible when compared to the final canvass and certified results.

The complexity of ballot packet flow between Maricopa's central counting place and their vendor, Runbeck, increases the need for disciplined chain of custody in order to ensure security and accuracy. Maricopa ignored chain of custody laws on Election Day and attempted to substitute scan counts of ballots after several transfers had already occurred. However, broken chain of custody occurs when there is a gap or lapse in the documentation which creates an opportunity for inserting or removing ballots or other potential tampering.



Hobbs claimed that "Maricopa maintain[s] chain of custody for every one of those early ballots ... such that the County would be aware of any ballot inserted or rejected or lost in any part of the process." The County's testimony and documents prove that 84,000 ballots could have been added or removed without the County even noticing.

Maricopa County avoided addressing the discrepancies that exist in their own documents during trial and still have not addressed them. They admittedly circumvented the mandates of the EPM without consequence. Public confidence in election outcomes has been shaken by Maricopa's disregard for the law. The remedy is transparency and accountability for the failures in previous elections and legitimate oversight to ensure Maricopa officials do not continue to deviate from the EPM in future elections.


End of Report  
Submitted July 21, 2023

## End Notes

1. <https://www.documentcloud.org/documents/23170344-10192022-letter-to-cochise-bos-re-tabulation>
2. [https://www.eac.gov/sites/default/files/bestpractices/Chain\\_of\\_Custody\\_Best\\_Practices.pdf](https://www.eac.gov/sites/default/files/bestpractices/Chain_of_Custody_Best_Practices.pdf)
3. [https://azsos.gov/sites/default/files/2019\\_ELECTIONS\\_PROCEDURES\\_MANUAL\\_APPROVED.pdf](https://azsos.gov/sites/default/files/2019_ELECTIONS_PROCEDURES_MANUAL_APPROVED.pdf)
4. Lake v Hobbs, Transcript Day 2, Pg 168
5. Lake v Hobbs, Transcript Day 1, Pg 19
6. Maricopa County Response Brief, Pg 20
8. Lake v Hobbs, Transcript Day 1, Pg 159
9. Richer's email showing they were unable to reconcile. See Appendix.
10. EV Ballot Rejections

 <b>MARICOPA COUNTY</b> Elections Department 		Early Voting Rejections Summary Nov 8 2022 General Election
1800	Bad Signatures (BS)	
1299	No Signature (NS)	
<b>3099</b>	<b>Total Early Voting Rejections (BS &amp; NS)</b>	
1527	Late Returns (L)	
<b>4626</b>	<b>Total Rejected and Late</b>	

11. <https://elections.maricopa.gov/asset/jcr:7bd36c75-477c-43d0-83db-80b2761ca698/11-08-2022-0%20Canvass%20BOS%20SUMMARY%20CANVASS.pdf>



ENGLISH ESPAÑOL

Estimated early ballots left to process and tabulate: 254,000  
 Estimated early ballots left to research: 1,114 (7,885 total)

The Elections Department will do another update of unofficial results daily.

Today, staff completed the verification of the historic 290,000 early ballots dropped off on Election Day.

This is now the third full day since Election Day. In Maricopa County, final results are typically reported 10-12 days following Election Day.

12. <https://elections.maricopa.gov/news-and-information/elections-news/maricopa-county-election-results-updated-november-11-2022.html>

13. Hobbs Response Brief, Pg 9-10

14. Final certification includes 1,311,734 Early Ballots. The county reported that 805,978 Early Ballot were returned through USPS and 505,756 Early Ballots were returned via drop boxes (EIN, MOB, Emergency Voting)

15. Maricopa County Board of Supervisors Final Canvass Meeting

<https://www.youtube.com/watch?v=LbeErDqNpdA>

**16. Link to County CoC Documents:**

- MCIROD: <https://archive.org/details/MC2022IROD>
- EVBTS: [https://archive.org/details/Maricopa\\_EVBTS\\_2022](https://archive.org/details/Maricopa_EVBTS_2022)
- MC Delivery Receipts: <https://archive.org/details/maricopa-delivery-receipts-2022>

## Appendix

Comparison of MC Inbound Receipt of Delivery to MC Incoming Scan Receipts  
 Defense Trial Exhibits 82 (November 8-9, 2022) -- Trial Exhibit 33

MC Inbound Receipt of Delivery								MC Incoming Scan Receipt			
Exhibit	Date	Time	USPS	MOB	CTR	MISC	Total	Date	Early <sup>2</sup>	Provis.	Exhibit
Hobbs 123	8-Nov	6:47AM <sup>1</sup>	5,600	33,994	7,844	1,041	<b>48,479</b>	8-Nov	1,675	0	Hobbs 159
Hobbs 124	8-Nov	7:15PM	Election Day				<b>1,750</b>	8-Nov	10,056	0	Hobbs 160
Hobbs 125	8-Nov	10:00PM	Election Day				<b>9,450</b>	8-Nov	3,244	248	Hobbs 161
Hobbs 126	8-Nov	11:43PM	Election Day				<b>28,350</b>	9-Nov	9,945	0	Hobbs 133
Hobbs 128	9-Nov	1:43AM	Election Day				<b>65,100</b>	9-Nov	10,486	0	Hobbs 134
Hobbs 129	9-Nov	3:27AM	Election Day				<b>73,500</b>	9-Nov	10,198	0	Hobbs 135
Hobbs 127	9-Nov	4:43AM	Election Day				<b>36,750</b>	9-Nov	9,847	0	Hobbs 136
<b>Total MC Inbound Receipt of Delivery Ballot Count 11/8</b>							<b>263,379</b> <sup>3</sup>	9-Nov	10,728	0	Hobbs 137
<p>Delivered to Runbeck on 11/8-9      <b>263,379</b></p> <p>Scanned at Runbeck on 11/8-9      <b>298,942</b></p> <p style="text-align: center;"><b>Discrepancy      -35,563</b></p> <p><sup>1</sup> 6:47AM Ballot Delivery on 8-Nov contained ballots from 7-Nov and USPS but all ballots were included in the count of ballots delivered to Runbeck on 8-Nov. This is the maximum number of ballots delivered and the lowest possible discrepancy.</p> <p><sup>2</sup> Early Ballots is the sum of all categories of early ballots on the MC Incoming Scan Receipt including all inbound scan, over, under, invalid app ID and unreadable.</p> <p><sup>3</sup> The total of 263,379 ballots does not include the 184 Late ballots delivered to Runbeck at 2:38PM on November 9, 2022 as shown on Table 1.</p> <p><b>Note:</b> The 6:47AM ballot delivery did not include any Election Day drop box ballots. Therefore, the discrepancy is actually 84,042 ballots.</p>								9-Nov	10,903	0	Hobbs 138
								9-Nov	10,231	0	Hobbs 139
								9-Nov	10,476	0	Hobbs 140
								9-Nov	10,735	2,173	Hobbs 141
								9-Nov	10,515	227	Hobbs 142
								9-Nov	10,565	240	Hobbs 143
								9-Nov	10,840	254	Hobbs 144
								9-Nov	11,149	362	Hobbs 145
								9-Nov	10,548	276	Hobbs 146
								9-Nov	10,559	294	Hobbs 147
								9-Nov	10,398	198	Hobbs 148
								9-Nov	11,087	215	Hobbs 149
								9-Nov	10,441	249	Hobbs 150
								9-Nov	10,484	248	Hobbs 151
								9-Nov	10,609	339	Hobbs 152
								9-Nov	10,544	237	Hobbs 153
								9-Nov	10,645	228	Hobbs 154
								9-Nov	10,799	327	Hobbs 155
9-Nov	10,847	293	Hobbs 156								
9-Nov	10,839	277	Hobbs 157								
9-Nov	12,510	293	Hobbs 158								
<p>Early Ballots      291,903      6,978      Provisional Ballots</p> <p><b>Total Runbeck Scan 298,942</b></p>											



**From:** Stephen Richer (MCRO) <[REDACTED]>  
**Sent:** Thursday, November 10, 2022 2:13 PM  
**To:** Rey Valenzuela (MCRO); Scott Jarrett (MCRO); Megan Gilbertson (MCRO);  
Matthew Roberts (MCRO); Fields Moseley (OOC)  
**Cc:** Bill Gates (BOS); Zach Schira (BOS); Darron Moffatt (MCRO); Abby Raddatz  
(MCRO)  
**Subject:** Ballot totals.

Unable to currently reconcile SOS listing with our estimates from yesterday.

Ours:

Friday-Sunday: 86,000

Monday: 52,000

Drawer 3: 17,000

ED drop offs: 291,000

Provisional: 8,000

= 454,000

(Minus)

Posted last night: 62,000

= 392,000

From SOS:

Remaining ballots according to SOS website: 407,664

So there's a 15,000 difference somewhere.

Thanks!

# **EXHIBIT C**

Election Day

MC INBOUND - RECEIPT OF DELIVERY

1377

ELECTION

11-4-20

DATE

RANDON

RES EMPLOYEE

9:30

TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	36x500	18,000	✓	✓
REGULAR MOB				
OUT OF SPEC				
NEED PACKET				
BLANK ENVELOPES				
LATES	■	<del>200</del>	<del>✓</del>	<del>✓</del>
GTR	38x450	17,100	✓	✓
✚				

DATE

COUNTY DELIVERED

DATE

SECURITY WITNESS

DATE

RES RECEIVED

# Maricopa County: Long Withheld Records Reveal More than 20,000 Mail Ballots Received After the Legal Deadline

## Verity Vote

### Late Returns

Arizona Law requires that all ballots be received by the county no later than 7pm on Election Day in order for them to be counted and valid<sup>1</sup>. However, review of Maricopa County 2020 General Election records shows that more than 20,000 ballots were transported from the United States Postal Service (USPS) after that deadline.

Verity Vote obtained delivery receipts from the county that show USPS ballots were received on November 4, 5 and 6. Any ballots not rejected are accepted by default and tabulated into the election results. Arizona law is clear that it is not an issue of the ballot postmark but the receipt of the ballot by the county prior to 7pm on Election Day.

Maricopa County reported that they rejected only 934 ballots due to lateness (Fig. 1). This leaves over 19K received ballots that show no evidence of rejection. According to Arizona law, these ballots should have been rejected.

MARICOPA COUNTY Elections Department		Early Voting Rejections Summary
		Nov 3 2020 General Election
587	Bad Signatures (BS)	
1455	No Signature (NS)	
2042	Total Early Voting Rejections (BS & NS)	
934	Late Returns (L)	
2976	Total Rejected and Late	

Figure 1: The Early Voting Rejections Summary shows 934 ballots rejected as Late Returns.

### Ballot Packet Transportation

Incoming USPS ballot packets are picked up by the County on a route driven at least daily. For efficiency, a Maricopa County Election Department employee starts the route from the County's Tabulation and Election Center (MCTEC) carrying some ballot packets already in the County's possession (those previously gathered from drop boxes and vote

centers by county employees). The County driver proceeds to the USPS facility, picks up ballot packets from the postal service, then transports the combined ballot tranche to Runbeck Election Services (RES) for an incoming scan. The ballot transportation route is diagrammed below (Fig. 2).

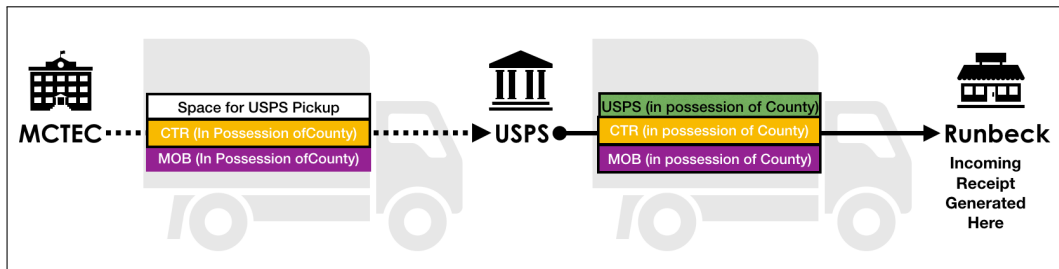


Figure 2: Ballot packet transportation route from MCTEC to the USPS to Runbeck Election Services.

At RES, the incoming quantity of ballots packets is recorded on an MC Inbound Receipt of Delivery (RoD) Form (Fig.3). The form has fields for date and time of delivery, number of trays and pieces, the signature of the County driver, RES recipient, and a security witness. The number of ballots recorded on the form is a close estimate based on the number of trays and the quantity of ballots that fit in each tray. Many RoD documents completed during the 2020 General Election were obtained as part of a public records request (PRR) submitted on October 5, 2021. Maricopa County made these documents available for inspection and copying on December 17, 2021. At that time, no MC Inbound Receipt of Delivery forms were provided for November 4th, 2020. At least one form was provided for all other days from October 13th through November 6th.

The form is titled 'MC INBOUND - RECEIPT OF DELIVERY'. It contains handwritten information for an election on 11-2-20 at 7:00 AM. The table below shows the data from the form:

TYPE OF INBOUND	# OF TRAYS / TRUS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	2x300	10,000	✓	✓
REGULAR MOB	27x500	10,500	✓	✓
OUT OF SPEC				
NEED PACKET				
BLUE ENVELOPES				
LATES	12x450	5,400	✓	✓

Annotations on the right side of the form point to specific rows:

- Red arrow: USPS Returned Ballots (points to the 'POST OFFICE INBOUND' row)
- Green arrow: Mail Ballots deposited in a drop box (points to the 'REGULAR MOB' row)
- Blue arrow: Early In Person Ballots deposited in a drop box (points to the 'LATES' row)

Figure 3: Sample Receipt of Delivery Form from November 2nd.

## Public Records Withheld

Verity Vote made numerous attempts to obtain the missing document(s). Several calls were made seeking the November 4th records. On March 21st, 2022, a follow-up email was sent to Celia (redacted), Assistant Director of Early Voting for Maricopa County to determine if a document had been created for the missing date. No response was received. On April 8, 2022, a new PRR was submitted requesting the missing Receipt of Delivery records for November 4th. After numerous delays, multiple follow up emails, and phone calls, county employees informed Verity Vote that records were with legal counsel pending review. Eleven days later, on May 19th, 2022, documents were finally approved for release by the County attorney and provided by MC Recorder's Office.

It took nearly seven months to get the documents only to be informed that the documents provided "do not represent the complete universe of MC Inbound Receipt of Delivery forms from November 4, 2020." The MC Recorder also wrote that they are unable to produce the other documents because they, "cannot be certain, but we believe that the remainder of these forms were transferred to the Treasurer's Office." If there are indeed additional forms for 11/4 then the number of USPS late mail ballots could be much higher than 20K.

They are continuing to withhold records claiming that they are stored with the official returns<sup>2</sup>. It is unclear why the Recorder would have transferred these record to the treasurer. The records in the treasurer's custody can only be examined with a court order. Therefore, Verity Vote can only report that the minimum number is 20,500 late USPS ballot packets.

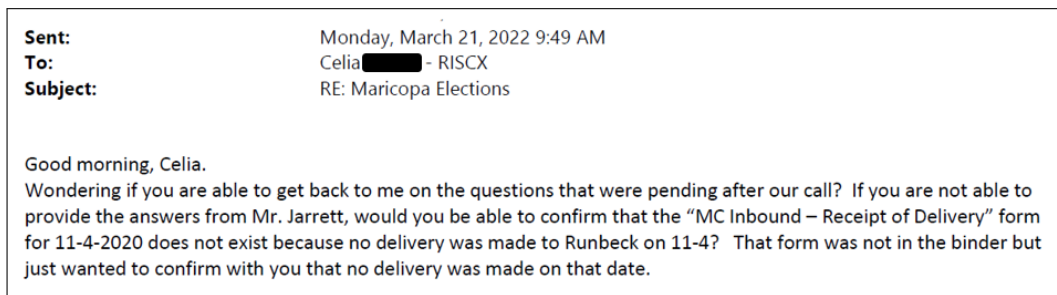


Figure 4: Follow up note to Maricopa County.

## Receipt of Delivery

The Receipt of Delivery form has been described in detail by the Maricopa County Elections Department. (Fig.5). The County defined all of the fields on the RoD form, making it clear that the "Post Office Inbound" entry reflects the approximate number of ballot packets that are "picked up at the post office by Elections and transported to RES." The estimated 20,500 ballot packets were recorded in that Post Office Inbound field. Notably, they were not recorded as "Lates" which the county defines as ballot packets received after election night 7PM but before the canvass (Fig.5). The County differentiates between mail ballots (MOB) and early in-person ballots (CTR) by recording the numbers on separate

lines. "MOB" represents green envelope packets that were retrieved from drop boxes; importantly, these are mail ballots already in the possession of the County. The designation "CTR" can also be added to this form to record the number of early in-person white ballot packets from vote centers when these are present.

**MARICOPA COUNTY**  
Elections Department

**MC INBOUND - RECEIPT OF DELIVERY**

ELECTION: 1333      DATE: 10-18  
RES EMPLOYEE: [Signature]      TIME: 7:46

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	57 x 100	0.5, 450	Y	
REGULAR MOB	1	0.63	Y	
OUT OF SPEC	1	1.86	Y	
NEED PACKET				
BLUE ENVELOPES				
LATES				

DATE: 10/27/21      COUNTY DELIVERED: [Signature]  
DATE: 10/27/21      SECURITY WITNESS: [Signature]  
DATE: 10/27/21      RES RECEIVED: [Signature]

The MC Inbound-Receipt of Delivery reflects the type and quantity of packets the Elections Department is returning to RES to be scanned.

- Type of Inbound**
  - # of trays/tubs**-reflects the number of trays and the approximate number of packets per tray.
  - QTY of pieces**-reflects the estimated number of packets
  - Sealed Yes/No**-reflects if the packets were delivered in a container with zip ties.
  - Seal #**-the serial number of the zip ties
- Post Office Inbound**-reflects the approximate quantity of packets/trays that were picked up at the post office by Elections and transported to RES for inbound scan.
- Regular MOB**-reflects packets that need to be sent through inbound scan. Examples include packets received from the drop boxes and cured packets.
- Out of Spec**-reflects the packets that were originally under/over the weight threshold. These packets were resolved by EV and need to be sent through inbound scan with the weight thresholds turned off.
- Need Packets**-not applicable
- Blue Envelopes**-packets received back from voters that were originally no signature packets.
- Lates**-reflects packets received after election night 7PM (before canvass)

Figure 5: Example MC Inbound – Receipt of Delivery form with description.

Review of the form dated 11/5 shows the receipt of 1000 USPS ballots (Fig. 7). The form dated 11/6 shows an additional 1500 USPS ballots were received on that date (Fig. 8). These two records alone show that at least 2500 mail ballots were received more than two days after the Election Day 7pm deadline. After over seven months of waiting, the November 4th Receipt of Delivery form revealed that 18,000 ballots were picked up from the post office more than 12 hours after the deadline. Verity Vote has made no assumptions here, County Recorder Stephen Richer confirmed that the RoD was from 11/4 at 9:30AM.



**Office of the Recorder**  
Maricopa County, Arizona

111 South Third Avenue  
Phoenix, Arizona 85003-2281  
Phone: (602) 506-3535  
Fax: (602) 506-3273

*County Recorder Stephen Richer*

May 18, 2022

Redacted

Redacted

Redacted

After an extensive search, we have found the attached MC Inbound Receipt Delivery form from 9:30am on November 4, 2020. This document does not represent the complete universe of MC Inbound Receipt Delivery forms from November 4, 2020. We cannot be certain, but we believe that the remainder of these forms were transferred to the Treasurer's Office to be stored and sealed with the ballots pursuant to ARS 16-624. In addition to the attached MC Inbound Receipt, we have attached a tracking document that was created on 11/4/2020 that shows the total number of early ballot affidavits that were dropped off at a voting location on Election Day.

Sincerely,

**Stephen Richer**  
Maricopa County Recorder

Figure 6: Letter confirming USPS pickup of 11/4.



### MC INBOUND - RECEIPT OF DELIVERY

1377  
 ELECTION

11-5  
 DATE

Brandon  
 RES EMPLOYEE

6:45  
 TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	2x500	1000	~	~
REGULAR MOB	2x500	1000	~	~
OUT OF SPEC				
NEED PACKET				
BLUE ENVELOPES				
LATES				

DATE \_\_\_\_\_ COUNTY DELIVERED \_\_\_\_\_  
 DATE \_\_\_\_\_ SECURITY WITNESS \_\_\_\_\_  
 DATE \_\_\_\_\_ RES RECEIVED \_\_\_\_\_

WHITE COPY TO RES - YELLOW COPY TO MARICOPA

MC INBOUND - RECEIPT OF DELIVERY 02-15

Figure 7: Maricopa County workers reported picking up 1000 ballots from the USPS on November 5th.



*Election Day*

**MC INBOUND - RECEIPT OF DELIVERY**

1377  
ELECTION

BRANDON  
RES EMPLOYEE

11-4-20  
DATE

9:30  
TIME

TYPE OF INBOUND	# OF TRAYS / TUBS	QTY OF PIECES	SEALED YES / NO	SEAL #
POST OFFICE INBOUND	36x500	18,000	✓	✓
REGULAR MOB				
OUT OF SPEC				
NEED PACKET				
BLUE ENVELOPES				
LATES	•	<del>17,100</del>	<del>✓</del>	<del>✓</del>
CTR	38x4150	17,100	✓	✓
<del>EA</del>				

DATE \_\_\_\_\_ COUNTY DELIVERED \_\_\_\_\_

DATE \_\_\_\_\_ SECURITY WITNESS \_\_\_\_\_

DATE \_\_\_\_\_ RES RECEIVED \_\_\_\_\_

WHITE COPY TO RES - YELLOW COPY TO MARICOPA

MC INBOUND - RECEIPT OF DELIVERY 02-15

Figure 9: Maricopa County reported picking up 18,000 ballots from the USPS on November 4th. Note that the 17,100 CTR designated ballots already in County custody are not late ballots.

## USPS Extraordinary Measures

Voters were instructed to mail ballots by October 27th. USPS reported that 2020 election ballot packets were delivered from voters to election officials in an average of 1.6 days with 97% of the ballots delivered within 3 days and 99.7% within 5 days<sup>3</sup>. Maricopa County ballot returns benefited from this rapid delivery which dropped the incoming USPS deliv-



## UOCAVA

In some jurisdictions, overseas and military ballots can be accepted beyond the close of the polls under the Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA). This is not the case in Arizona, where even the UOCAVA ballots must be received by 7pm on election day.

Verity Vote analyzed the VM55 and the EV33 reports to determine how many UOCAVA ballots had not been acknowledged as received by November 2nd. Records show that only 1,241 ballot envelopes had not been scanned as of 11/2, a number very near to the 1,270 UOCAVA affidavit envelopes images reported missing by Dr. Shiva Ayyadurai in his ballot envelope analysis (private communication). So there is reason to believe these UOCAVA ballots were already counted by 11/2, and there are few of them relative to the number of late ballots, and the law prohibits their counting—UOCAVA cannot be used to justify the counting of these late ballots.

## Conclusion

Maricopa County withheld requested public documents for nearly seven months. These documents show 18,000 additional late ballots not previously reported. Several contests were decided by less than 20K votes, most notably the statewide presidential race that was decided by only 10,457. The 20,000 ballots recorded as incoming from the USPS on and after November 4 were of sufficient quantity to change the result of the 2020 General Election in Arizona.

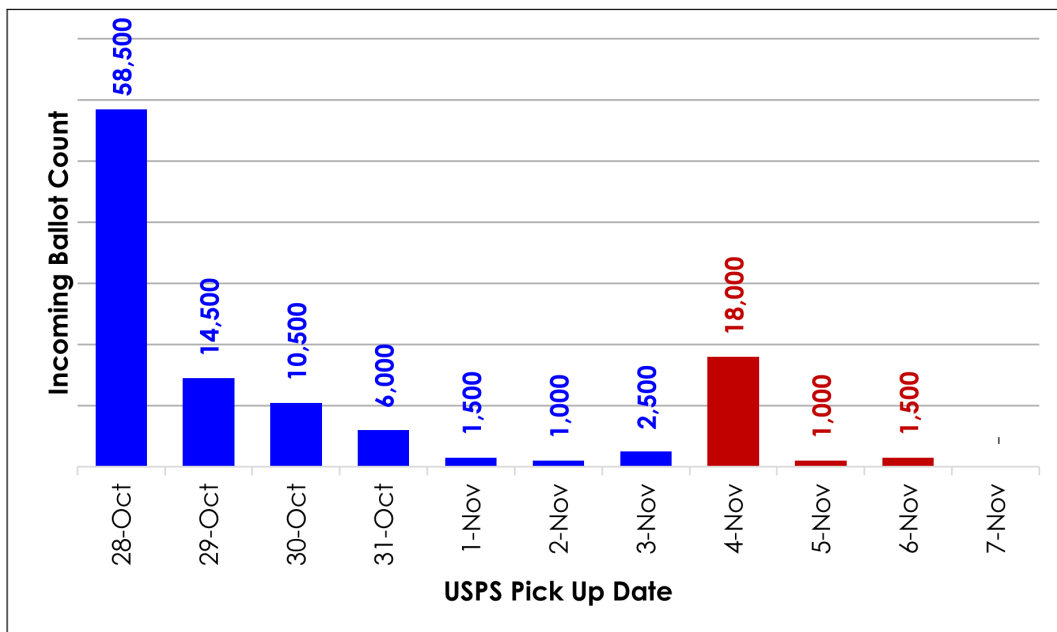


Figure 11: USPS Incoming Receipts for the days around Election Day.

## References

<sup>1</sup> ARS 16-548 says, "In order to be counted and valid, the ballot must be received by the county recorder or other officer in charge of elections or deposited at any polling place in the county no later than 7:00 p.m. on election day."

<sup>2</sup> ARS 16-624 says that official returns must be stored in a secure facility managed by the county treasurer, unopened for twenty-four months

<sup>3</sup> [https://about.usps.com/newsroom/national-releases/2020/USPS\\_PostElectionAnalysis\\_12\\_28\\_20.pdf](https://about.usps.com/newsroom/national-releases/2020/USPS_PostElectionAnalysis_12_28_20.pdf)

End of Report  
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