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JEFF FINE  
Clerk of the Superior Court  
By Eufemia Vazquez-Fregoso, Deputy  
Date 11/24/2020 Time 16:55:08  
Description Amount  
----- CASE# CV2020-015285 -----  
ELECTION CONTEST#NEW 333.00  
-----  
TOTAL AMOUNT 333.00  
Receipt# 28034632

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF MARICOPA**

**KELLI WARD,**

**Plaintiff;**

vs.

**CONSTANCE JACKSON; FELICIA  
ROTELLINI; FRED YAMASHITA;  
JAMES MCLAUGHLIN; JONATHAN  
NEZ; LUIS ALBERTO HEREDIA; NED  
NORRIS; REGINA ROMERO; SANDRA D.  
KENNEDY; STEPHEN ROE LEWIS; and  
STEVE GALLARDO;**

**Defendants.**

Case No. CV 2020-015285

**VERIFIED PETITION FOR  
RULE 27 DISCOVERY**

**(Elections Contest)**

Petitioner/Plaintiff, for her Verified Petition for Rule 27 Discovery against the above-named Defendants (hereinafter referred to as the "Petition" or "Complaint"), allege as follows:

**INTRODUCTION**

1. Petitioner expects to be a party to an action cognizable in this Court but cannot presently bring it or cause it to be brought.

1           2.       The subject matter of the action is an elections contest pursuant to A.R.S. § 16-672  
2 *et seq.* (hereinafter referred to as the “Elections Contest”). Plaintiff is expected to be plaintiff in  
3 the Elections Contest.

4           3.       The Elections Contest cannot be presently brought, because A.R.S. § 16-676  
5 provides that “[t]he elector contesting a state election shall, within five days after completion of  
6 the canvass of the election and declaration of the result thereof by the secretary of state or by the  
7 governor, file in the court in which the contest is commenced a statement [of the election  
8 contest]...” *See also Nicol v. Superior Court, Maricopa Cty.*, 106 Ariz. 208, 211–12, 473 P.2d  
9 455, 458–59 (1970)(finding that elections contest filed before statewide candidate is officially  
10 declared nominated is premature: “[t]he legislature, in its wisdom, has throughout these years  
11 evidently refrained from passing legislation permitting such actions as in the instant case....The  
12 machinery and the time for bringing such proceedings is plainly set forth in the statute. The  
13 action of the respondent is therefore premature, and proper procedure has not been followed.”)

14           4.       The statewide canvass and declaration of the result thereof has not occurred as of  
15 this filing and is not expected to occur until November 30<sup>th</sup>, 2020. Therefore, the Elections  
16 Contest cannot presently be brought.

17           5.       The subject matter of the Elections Contest is set forth in the proposed Complaint  
18 attached as Exhibit “1” hereto, which is hereby incorporated as if set forth herein.

19   **PARTIES, JURISDICTION AND VENUE**

20           6.       The name and residence of the person who expects to be party to the Elections  
21 Contest is as follows:

22   Kelli Ward  
23   3619 Desert Rose Lane  
24   Lake Havasu City, AZ 86404  
25  
26

1 7. The expected adverse parties to the Elections Contest are:

2 Constance Jackson  
3 Felicia Rotellini  
4 Fred Yamashita  
5 James McLaughlin  
6 Jonathan Nez  
7 Luis Alberto Heredia  
8 Ned Norris  
9 Regina Romero  
10 Sandra D. Kennedy  
11 Stephen Roe Lewis  
12 Steve Gallardo<sup>1</sup>

13 8. The foregoing persons are hereinafter referred to as the “Biden Electors.”

14 9. Jurisdiction and venue are appropriate pursuant to A.R.S. § 16-672(B) *inter alia*.

15 **GENERAL ALLEGATIONS**

16 10. The foregoing allegations are reincorporated as if set forth herein.

17 11. As set forth in the proposed Elections Contest, and in accordance with the Civil  
18 Rules and/or A.R.S. § 16-677, Plaintiff intends to seek the following items:

- 19 (a) An inspection of “mail-in” ballots including signed envelopes (and/or scans  
20 thereof). Given the large number of ballots and limited timeframes, Plaintiff  
21 requests a reasonable inspection (sampling) of the signatures that can be  
22 performed in the appropriate statutory timeframes (hereinafter referred to as  
23 the “inspection/discovery”), and to compare the mail-in ballot signatures to  
24 the signatures on file. By the proposed inspection/discovery, Plaintiff  
25 wishes to determine whether the failure by election officials to allow legal  
26 observation of the mail-in ballot signature-verification process – which is  
the only “check” that is performed by elections officials to ensure that mail-

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<sup>1</sup> To the extent known or surmised, the addresses for the Defendant-electors are identified in the summonses, which are hereby incorporated as if set forth herein.

1 in ballots were actually filled out by the voter – resulted in insufficiently or  
2 falsely verified ballots being approved and tabulated (as detailed in Exhibit  
3 1, the proposed Complaint). Because the envelopes are not available for  
4 public inspection, legal inspection/discovery is the only means by which  
5 Plaintiff may seek this information. Such inspection is provided for by  
6 A.R.S. § 16-677 and is relevant to prove that as a result of misconduct by  
7 elections officials, the outcome of the election is fundamentally uncertain  
8 and therefore Defendants’ election may be annulled and set aside pursuant  
9 to A.R.S. § 16-676(B). The names and addresses of each person from  
10 whom discovery is sought are Maricopa County Supervisors Clint  
11 Hickman, Jack Sellers, Steve Chucuri, Bill Gates, and Steve Gallardo, as  
12 well as the officer(s) in charge of the Maricopa County Elections  
13 Department (the “Maricopa County Board and Elections Officials”) located  
14 at 301 W. Jefferson St. #10, Phoenix AZ 85003.

15 (b) An inspection to compare “duplicate” ballots to the original ballots from  
16 which they were “duplicated,” for Congressional District 5 inclusive of all  
17 Queen Creek vote centers/polling places in particular. As detailed in the  
18 proposed Elections Contest, legal observation of the process by which  
19 ballots were “duplicated” was also not allowed, since the process occurred  
20 off-site. Further, there was an unusually high number of duplicate ballots in  
21 Congressional District 5/Queen Creek; and the results there were strongly  
22 inconsistent with both voter registration data (for party affiliation) and  
23 historical voting data (voting in previous elections including the 2016  
24 Presidential election). The names and addresses of each person from whom  
25  
26

1 discovery is sought are given above (the Maricopa County Board and  
2 Elections Officials) at the address above, incorporated as if set forth herein.

3 12. The reasons for perpetuating the evidence in advance of the expected action are  
4 that (1) given the potential magnitude of the inspection/discovery, as well as the ten to fifteen  
5 day window in which a trial on the elections contest must be statutorily conducted (*see*  
6 A.R.S. § 16-676(A)), Plaintiff may not be able to conduct any much less all of the requested  
7 discovery in time for trial, unless they are able to start now. (2) Despite the express provisions in  
8 A.R.S. §§ 16-676, 16-677 that an Elections Contest may only be filed after certification of the  
9 vote, and that Plaintiff is entitled to have inspections made “before preparing for trial,” Plaintiff  
10 wishes to avoid any argument (no matter how infirm or unfair) that inspection/discovery may be  
11 denied on grounds of laches of any kind.

12 13. The evidence Plaintiff expects to obtain from the discovery is a reasonable  
13 inspection (sampling) of mail-in ballots, specifically including their signed envelopes (and/or  
14 scans thereof) and to compare them to the signatures on file; as well as an inspection to compare  
15 “duplicate” ballots to the original ballots from which they were “duplicated,” for Congressional  
16 District 5/Queen Creek in particular.

17 14. Plaintiff therefore asks for an order directing the clerk to issue a subpoena under  
18 Rule 45 to obtain the foregoing inspection/discovery in order to perpetuate the evidence.

19 15. Plaintiff further asks for the Court to hold an immediate hearing on the relief that  
20 this Petition seeks, pursuant to Rule 27(a)(2).

21 16. Because Plaintiff believes that service on the Defendants/expected adverse parties  
22 cannot be made with reasonable diligence, Plaintiff asks the court to order service by  
23 publication.

24 17. Pursuant to Rule 27(a)(5)(A), “[i]f satisfied that perpetuating the testimony or  
25 preserving other evidence may prevent a failure or delay of justice, the court must enter an order  
26

1 that: (i) identifies each person who may be served with a subpoena under Rule 45 to obtain  
2 testimony or for the inspection of documents or premises and specifies the subject matter of the  
3 permitted examination...”

4 18. In order to prevent a failure or delay of justice, Plaintiff asks the Court to enter an  
5 order providing that the Maricopa County Board and Elections Officials may be served with a  
6 subpoena to obtain a reasonable inspection of mail-in ballots (including their signed envelopes  
7 and/or scans thereof) to compare them to the signatures on file; and that the Maricopa County  
8 Board and Elections Officials may be served with a subpoena to compare “duplicate” ballots to  
9 the original ballots from which they were “duplicated,” for Congressional District 5/Queen  
10 Creek in particular; either as discovery under the Civil Rules and/or in accordance with  
11 A.R.S. § 16-677.

12 **PRAYER FOR RELIEF**

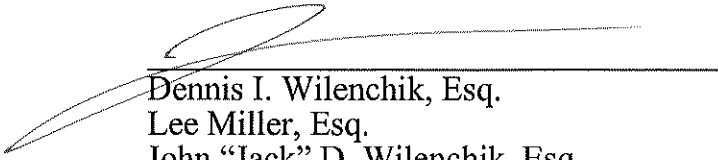
13 WHEREFORE, Plaintiff requests the following relief:

- 14 A. That the Court enter an order providing that the Maricopa County Board and  
15 Elections Officials may be served with a subpoena to obtain a reasonable  
16 inspection of mail-in ballots (including their signed envelopes and/or scans  
17 thereof) to compare them to the signatures on file; and that the Maricopa County  
18 Board and Elections Officials may be served with a subpoena to compare  
19 “duplicate” ballots to the original ballots from which they were “duplicated,” for  
20 Congressional District 5/Queen Creek in particular; either as discovery under the  
21 Civil Rules and/or in accordance with A.R.S. § 16-677.
- 22 B. For such injunctive, declaratory, mandamus (special action) or other relief as may  
23 be proper or necessary to effect these ends;
- 24 C. For Plaintiff’s taxable costs under A.R.S. § 12-341;
- 25  
26

1 D. For such other and further relief that the Court may deem proper in the  
2 circumstances.

3 **RESPECTFULLY SUBMITTED** this 24<sup>th</sup> day November, 2020.

4 **WILENCHIK & BARTNESS, P.C.**

5   
6 \_\_\_\_\_  
7 Dennis I. Wilenchik, Esq.  
8 Lee Miller, Esq.  
9 John "Jack" D. Wilenchik, Esq.  
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11 2810 North Third Street  
12 Phoenix, Arizona 85004  
13 [jackw@wb-law.com](mailto:jackw@wb-law.com)  
14 [admin@wb-law.com](mailto:admin@wb-law.com)  
15 *Attorneys for Plaintiff*

11 **ORIGINAL** of the foregoing filed  
12 this 24<sup>th</sup> day of November, 2020, with:

13 The Clerk of the Superior Court  
14 Maricopa County Superior Court  
15 201/101 West Jefferson Street  
16 Phoenix, Arizona 85003

16 By   
17 \_\_\_\_\_

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**VERIFICATION**

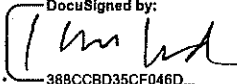
(Rule 80(i), Ariz.R.Civ.P.)

I, Kelli Ward, declare as follows:

I have read the foregoing Verified Petition for Rule 27 Discovery, and the statements made therein are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

DATED 11/24/2020 \_\_\_\_\_.

DocuSigned by:  
  
By: 388CCBD35CF046D...  
Kelli Ward



# EXHIBIT 1





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*Attorneys for Plaintiff/Contestant*

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF MARICOPA**

**KELLI WARD,**

**Contestant;**

vs.

**CONSTANCE JACKSON; FELICIA  
ROTELLINI; FRED YAMASHITA;  
JAMES MCLAUGHLIN; JONATHAN  
NEZ; LUIS ALBERTO HEREDIA; NED  
NORRIS; REGINA ROMERO; SANDRA D.  
KENNEDY; STEPHEN ROE LEWIS; and,  
STEVE GALLARDO;**

**Contestees.**

Case No. \_\_\_\_\_

**[PROPOSED]  
VERIFIED STATEMENT OF  
ELECTIONS CONTEST  
PURSUANT TO A.R.S. § 16-673**

**(Elections Matter)**

**(Expedited Relief Requested)**

Plaintiff/Contestant ("Plaintiff"), for her Verified Statement of Elections Contest against the above-named Contestees/Defendants ("Defendants"), alleges as follows:

**INTRODUCTION**

1. This is an elections contest pursuant to A.R.S. § 16-672 *et seq.*

**PARTIES, JURISDICTION AND VENUE**

2. The name and residence of the party contesting the election is as follows:

1 Kelli Ward  
2 3619 Desert Rose Lane  
3 Lake Havasu City, AZ 86404

3 3. The foregoing person is referred to herein as the "Plaintiff."

4 4. Plaintiff is an elector of the state and county in which she resides.

5 5. The name of the persons whose right to office is contested, as they appeared upon  
6 the official ballot, are:

7 Constance Jackson  
8 Felicia Rotellini  
9 Fred Yamashita  
10 James McLaughlin  
11 Jonathan Nez  
12 Luis Alberto Heredia  
13 Ned Norris  
14 Regina Romero  
15 Sandra D. Kennedy  
16 Stephen Roe Lewis  
17 Steve Gallardo

14 6. The foregoing persons are hereinafter referred to as the "Biden Electors."

15 7. Anthony Kern, Greg Safsten, Jake Hoffman, James Lamon, Kelli Ward, Lorraine  
16 Pelligrino, Michael Ward, Nancy Cottle, Robert Montgomery, Samuel Moorhead, and Tyler  
17 Bowyer are the presidential electors for Donald J. Trump (the "Trump Electors").

18 8. Jurisdiction and venue are appropriate pursuant to A.R.S. § 16-672(B).

19 **GENERAL ALLEGATIONS**

20 9. The foregoing allegations are reincorporated as if set forth herein.

21 10. Presidential elector is the office to which election is contested.

22 **Mail-in Ballot Signature Verification**

23 11. While Arizona has been using mail-in voting since 1992, the process has  
24 comparatively few safeguards to ensure the integrity of mail-in ballots and to protect against  
25 mistake or fraud. In fact, as the EPM acknowledges, "Arizona's method of proving identity for  
26

1 mail-in early voters (signature comparison) is not expressly permitted” under federal law, which  
2 may require voters to provide more stringent proof of identity (e.g. for first time voters). *See p.*  
3 *25 of the EPM; 52 U.S.C. § 21083(b).*

4 12. To vote in-person in the State of Arizona, voters must prove their identity at the  
5 voting location with a valid photo ID that matches their registered name and address, or with  
6 two forms of valid non-photo ID that match their registered address, or with one valid photo ID  
7 that does not match plus a non-photo valid ID that does. A.R.S. § 16-579(A)(1)(a)-(c); *see also*  
8 *p. 181 of the EPM.*

9 13. In contrast, for mail-in ballots, a county worker—who typically has fewer than six  
10 hours of training (and as little as two, for handwriting analysis)—decides only whether a  
11 signature that was scanned from the mail-in ballot envelope looks like the voter’s scanned  
12 signature(s) on file. Further, in Arizona, copies of a registered voter’s scanned signature are  
13 publicly available from the Department of Motor Vehicles, if they have a driver’s license, among  
14 other places—making a voter’s signature relatively easy to reproduce. County workers typically  
15 spend very little time evaluating a given signature, a matter of seconds.

16 14. Further, when a signature is questioned by elections officials, Arizona law  
17 provides for a fairly rigorous process by which a bipartisan team (of one Republican and/or one  
18 Democrat and/or one “Other”) participates in an “adjudication” of whether the signature was  
19 actually valid. However, if a county worker does *not* question a signature, then there is no  
20 “adjudication” or further review, much less by a bipartisan team—which again makes it easier  
21 for false or otherwise insufficient signatures to escape detection.

22 15. Further, because when county workers review the signatures they are not  
23 reviewing original “wet” signatures but rather electronic scans, they cannot genuinely follow  
24 basic methodology for detecting false or copied signatures, such as analyzing pen pressure.



1 25. To cure this, a “bipartisan” team of county workers (one Republican, one  
2 Democrat, and/or one “Other”) would create a new “duplicate” ballot by (1) reading/interpreting  
3 the votes on the original; (2) filling in an “electronic” ballot; and then (3) sending the  
4 “electronic” ballot to an offsite printing company to print the new “duplicate” ballot, so that it  
5 could be run again through the tabulation machine.

6 26. However, official observers were neither present nor invited to be present for the  
7 activities of the offsite company. As a result, official observers were unable to observe, for  
8 example, whether the “electronic” ballots were being accurately and properly received by the  
9 print company, that the company was printing the correct ballots, or that it was delivering the  
10 correct ballots back to MCTEC.

11 27. Further, when county workers filled in the “electronic” ballot, they used software  
12 called “Novus 6.0.0.0” which would try to “prefill” the ballot, by “reading” an optical scan of  
13 the original rejected ballot. However, the software was highly inaccurate, and it often flipped the  
14 vote—leaving it up to county workers or on-site observers to “catch it” or else effectively  
15 reverse the person’s vote. It was also observed that, for whatever reason, the software would  
16 erroneously prefill “Biden” much more often (apparently twice as often) as it did “Trump.”

17 28. There was an unusually high number of “duplicate” ballots in Congressional  
18 District 5 (“CD5”), inclusive of the vote centers/polling places in Queen Creek. Further, the  
19 results in CD5/Queen Creek were strongly inconsistent with voter registration data (party  
20 affiliation) and with historical voting data (voting in previous elections including the 2016  
21 Presidential election).

22 **COUNT ONE – ELECTIONS CONTEST**

23 (A.R.S. § 16-673)

24 29. The foregoing allegations are incorporated as if set forth herein.  
25  
26

1           30.    A.R.S. § 16-672 provides that “[a]ny elector of the state may contest the election  
2 of any person declared elected to a state office...upon any of the following grounds:” “[f]or  
3 misconduct on the part of election boards or any members thereof in any of the counties of the  
4 state, or on the part of any officer making or participating in a canvass for a state election...”

5           31.    The statute also provides other grounds for an elections contest, including but not  
6 limited to “[o]n account of illegal votes,” or “[t]hat by reason of erroneous count of votes the  
7 person declared elected...did not in fact receive the highest number of votes for the office....”

8           32.    A.R.S. § 16-621 provides that “[a]ll proceedings at the counting center shall be  
9 under the direction of the board of supervisors or other officer in charge of elections and shall be  
10 conducted in accordance with the approved instructions and procedures manual issued pursuant  
11 to § 16-452 under the observation of representatives of each political party and the public.”

12 (Emphasis added.)

13           33.    A.R.S. § 16-552 also provides that “[p]arty representatives and alternates may be  
14 appointed...to be present” when election officials count early ballots, “and to challenge the  
15 verification of questioned ballots pursuant to § 16-584...”

16           34.    The Secretary of State’s Elections Procedures Manual (“EPM”), which carries the  
17 force of law pursuant to A.R.S. § 16-452, further provides:

18                   Political party representatives are permitted to observe at voting locations  
19 and central counting places for partisan elections....Such observation (and  
20 observation at early voting locations, emergency voting centers, and County  
21 Recorder processing procedures, where permitted by the County Recorder or  
22 other officer in charge of elections) are subject to the procedures described  
23 below...

24                   The County Recorder or other officer in charge of elections may develop  
25 additional local procedures governing political party observation. Additional  
26 procedures shall allow political party observers to effectively observe the  
election process....

EPM, page 139.

1 35. The EPM also provides:

2 Political party representatives may observe at a central counting place and  
3 at each point where ballots are handled or transferred from one election  
4 official to another, including areas where the following activities take place:  
5 [r]eceiving the ballots at the County Recorder's office or central counting  
6 place; [i]nspecting the ballots; [r]eviewing ballots by the Write-in Tally  
7 Board; [d]uplicating ballots by the Ballot Duplication Board; [a]djudging  
8 ballots by the Electronic Vote Adjudication Board; [r]eceiving electronic  
9 media or processing voting results by the Accuracy Certification Board;  
10 [t]abulation of ballots; and/or [a]ny other significant tabulation or  
11 processing activities at a central counting place provided that it does not  
12 interfere with or impede the election procedures or staff.

13 EPM, page 141.

14 36. The language in A.R.S. § 16-672 (the elections contest statute) is similar to a  
15 California statute, Cal. Elec. Code § 16100. *See Henderson v. Carter*, 34 Ariz. 528, 533, 273 P.  
16 10, 11 (1928)(noting similarity of Arizona elections-contest statute to California code, and  
17 analogizing to California caselaw interpreting it). While there is no authority in Arizona squarely  
18 interpreting the meaning of "misconduct" in A.R.S. § 16-672(A)(1), the California courts have  
19 interpreted their statute (which uses even harsher words, "guilty of misconduct") as being  
20 intended "to broadly include erroneous conduct without wrongful intention."

21 37. Election officials' failure and/or refusal to allow legal observers to observe  
22 signature-verification constitutes "misconduct on the part of...officer[s] making or participating  
23 in a canvass for a state election," pursuant to A.R.S. § 16-672(A)(1).

24 38. Because Arizona's method of proving identity for mail-in early voters relies  
25 entirely on signature verification, and because election officials did not allow legal observation  
26 of signature verification to occur—potentially allowing falsely or insufficiently verified ballots  
to be counted—then the result of the election is fundamentally uncertain.

39. Further, because the signed envelopes (or scans thereof) are not available for  
public inspection, Plaintiff has no way of knowing without a court-ordered inspection pursuant  
to A.R.S. § 16-677 and/or the Civil Rules whether falsely or insufficiently verified ballots were



1 counted, and therefore Plaintiff cannot properly prepare for trial without such inspection, in  
2 satisfaction of the foregoing statute and/or court rules.

3 40. Given the large number of ballots and limited timeframes, Plaintiff requests a  
4 reasonable inspection (sampling) of the signatures that can be performed in the appropriate  
5 statutory timeframes.

6 41. Plaintiff also request to inspect “duplicate” ballots and compare them to the  
7 original ballots from which they were “duplicated,” for Congressional District 5/Queen Creek in  
8 particular.

9 42. Pursuant to A.R.S. § 16-677 and/or court rules, Plaintiff is entitled to have the  
10 inspection/discovery done before preparing for trial. If and as the Court deems it appropriate,  
11 Plaintiff ask to file a bond, approved by the clerk, with two sureties, in the principal amount of  
12 three hundred dollars, conditioned that they will pay the costs and expenses of the inspection if  
13 they fail to maintain the contest. Thereupon the Court shall appoint three persons, one selected  
14 by each of the parties and one by the Court, by whom the inspection shall be made. If either  
15 party fails to name a person to act in making the inspection, the Court shall make the  
16 appointment. The inspection of the ballots shall be made in the presence of the legal custodian  
17 of the ballots, and the compensation of the inspectors shall be fixed by the court and taxed as  
18 costs against the losing party.

19 **PRAYER FOR RELIEF**

20 WHEREFORE, Plaintiff requests the following relief:

21 A. That the Court order a reasonable inspection (sampling) of mail-in ballots  
22 (including their signed envelopes and/or scans thereof) in order to compare them  
23 to the signatures on file; and to compare “duplicate” ballots to the original ballots  
24 from which they were “duplicated,” for Congressional District 5/Queen Creek in  
25 particular; as discovery under the Civil Rules and/or in accordance with  
26 A.R.S. § 16-677;

- 1 B. That the Court declare that the certificate of election of the Biden Electors is of no  
2 further legal force or effect, and that the election is annulled and set aside in  
3 accordance with A.R.S. § 16-676(B);
- 4 C. That, if an inspection of the ballots should so prove, the Court declare that the  
5 Trump Electors have the highest number of legal votes and declare those persons  
6 elected;
- 7 D. For such injunctive, declaratory, mandamus (special action) or other relief as may  
8 be proper or necessary to effect these ends;
- 9 E. For Plaintiff's taxable costs under A.R.S. § 12-341 and fees under any applicable  
10 authority;
- 11 F. For such other and further relief that the Court may deem proper in the  
12 circumstances.

13 **RESPECTFULLY SUBMITTED** this 24<sup>th</sup> day November, 2020.

14 **WILENCHIK & BARTNESS, P.C.**

15 \_\_\_\_\_  
16 Dennis I. Wilenchik, Esq.  
17 Lee Miller, Esq.  
18 John "Jack" D. Wilenchik, Esq.  
19 The Wilenchik & Bartness Building  
20 2810 North Third Street  
21 Phoenix, Arizona 85004  
22 [jackw@wb-law.com](mailto:jackw@wb-law.com)  
23 [admin@wb-law.com](mailto:admin@wb-law.com)  
24 *Attorneys for Plaintiff*

25 **ORIGINAL** of the foregoing filed  
26 this \_\_ day of November, 2020, with:

The Clerk of the Superior Court  
Maricopa County Superior Court  
201/101 West Jefferson Street  
Phoenix, Arizona 85003

By \_\_\_\_\_

1 **VERIFICATION**

2 (Rule 80(i), Ariz.R.Civ.P.)

3 I, Kelli Ward, declare as follows:

4 I have read the foregoing Verified Complaint, and the statements made therein are true  
5 and correct to the best of my knowledge, information, and belief.

6 I declare under penalty of perjury that the foregoing is true and correct.

7 DATED \_\_\_\_\_.

8  
9 By: \_\_\_\_\_  
10 Kelli Ward