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8 ATTORNEYS FOR INTERVENOR-
9 PLAINTIFFS

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11
12 **IN THE SUPRIOR COURT OF THE STATE OF ARIZONA**
13 **IN AND FOR THE COUNTY OF MARICOPA**
14

15 **KELLI WARD,**

16 **Plaintiff,**

17 **JAMES STEVENSON, BARON**
18 **BENHAM, LYNIE STONE, JESSICA**
19 **CHAMBERS, AS AGGRIEVED**
20 **ELECTORS,**

21 **Intervenor-Plaintiffs,**

22 **vs.**

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

Defendants.

Case No. CV 2020-015285

PLEADING IN INTERVENTION

JUDGE RANDALL H. WARNER

23 The Intervenor-Plaintiffs, by and through their attorneys of record, file this Pleading in
24 Intervention for election contest to nullify the November 3, 2020 Presidential election result in
25 Arizona pursuant to Arizona Statutes § 16-672 et. seq., as follows.
26
27
28

INTRODUCTION

Intervenor-Plaintiffs James Stevenson, Baron Benham, Lynie Stone, and Jessica Chambers, members of the Arizona Election Integrity Association (“AEIA”), brings this pleading in intervention contesting a razor-thin margin in the Presidential election based on election integrity and illegal votes.

Intervenor-Plaintiffs files this Pleading in Intervention against the Defendants because state and local election administration officials have so mismanaged the election process that no one can have faith that one of their most sacred rights under the United States and Arizona Constitutions, voting, is being protected.

Within the State of Arizona, private non-profits, state officials and local elected officials acted to systematically eviscerate Arizona’s Election Law contrary to Title 16 of the Official Code of Arizona—failing to protect election integrity and prevent illegal votes from infecting the system. Investigations have uncovered more than \$400 million distributed nationwide - \$3 million of which went to Maricopa County and millions to several other local governments in Arizona—and funneled through a collection of non-profit organizations dictating to election officials how to manage the election.

In particular, the Center for Tech and Civic Life (CTCL) distributed \$350 million in conditional grants, of which nearly \$3 million went to Maricopa County, Arizona. These unregulated private funds were predominantly used to:

- (1) pay “ballot harvesters”;
- (2) provide mobile ballot pick up units;
- (3) deputize and pay political activists to manage ballots;
- (4) pay election judges and poll workers;
- (5) establish drop-boxes and satellite offices;
- (6) pay local election officials and agents to recruit cities recognized as democratic strongholds to recruit other cities to apply for grants from non-profits;

(7) consolidate counting centers in the urban core to facilitate the movement of hundreds of thousands of questionable ballots in secrecy without legally required bi-partisan observation;

(8) initiate and implement a two-tier ballot “curing” plan that illegally counted ballots in Democrat strongholds and spoil similarly situated ballots in Republican strongholds; and

(9) pay for and help design the plan to remove the poll watchers from one political party so that the critical responsibility of determining the validity of the ballot and the validity of the count could be conducted without oversight.

Arizona’s absentee voting records demonstrate illegal votes being counted and legal votes not being counted in the federal election. In Arizona, according to the government’s data, illegal votes were counted and legal votes were not counted in numbers that greatly exceed the 10,457 vote razor-thin difference in the Presidential election. The estimated number of illegal votes counted and legal votes not counted in Arizona, based on the government’s data, exceeds 300,000. Because of the number of illegal votes counted and legal votes not counted far exceeds the razor-thin margin, based on the government data, no one knows who won Arizona? So, the election result should be nullified and the appointment of the electors should revert to the state legislature as provided in Article II of the United States Constitution.

Arizona Election Contest

Arizona Presidential Election Contest

Margin +10,457

Type	Description	Margin
1) Illegal Votes Counted	Estimate of ballots requested in the name of a registered	204,586

	Republican by someone other than that person	
2) Legal Votes Not Counted	Estimate of Republican ballots that the requester returned but were not counted	75,033
3) Illegal Votes Counted*	Electors voted where they did not reside.	19,997
4) Illegal Votes Counted*	Out of State Residents Voting in State	5,790
5) Illegal Votes Counted*	Double Votes	157
TOTAL 1 & 2		279,619
TOTAL		305,563

*May overlap

The problems of illegal votes being counted and legal votes not being counted nationwide were exacerbated by the unregulated private monies sourced to Mark Zuckerberg dictating the conduct of local election officials. These unregulated private funds exceeded the federal government's March 2020 nationwide appropriation to assist local governments in managing the general election during the pandemic. As these funds flowed through the pipeline directly to local public officials, the outlines of two-tiered treatment of the American voter began to take place. For example, Maricopa County, flush with cash,, initiated public-private coordinated voter registration drives allowing private access directly to government voter registration files, access to early voting opportunities, along with the coordinated provision of incentives for early voters and

1 the off-site collection of ballots, establishing disparate impact. Outside of Maricopa County,
2 election officials were unable in initiate equal efforts.

3 This “shadow government” operation was funded through non-profit grants which dictated
4 methods and procedures to local election officials and in which the grantors retained the right to
5 “claw-back” funds if election officials failed to reach privately-set benchmarks—entangling the
6 private-public partnership deeply into Arizona’s federal election management. Transparency
7 was required. Yet, none was or has yet been given. These constitutionally-impermissible private-
8 public partnerships directed private conditional moneys to conduct federal elections. Their conduct
9 contributed to a historically high number of illegal votes counted and legal votes not counted in
10 Arizona, undermining the integrity of the election process as a social contract to maintain our
11 democratic form of government.

12 **PARTIES, JURISDICTION, VENUE, AND STATUTORY REQUIREMENTS**

13 1. The Arizona Supreme Court has original jurisdiction, concurrent with the
14 Superior Courts, over post-election contests involving Arizona’s appointment of
15 Presidential Electors.

16 2. The Arizona Superior Courts have jurisdiction in election conduct cases
17 under Arizona Statutes § 16-672(B). Under this statute, Intervenor-Plaintiffs may as a
18 matter of right bring this suit.

19 3. Arizona Statutes § 16-672(A)(1) authorizes a voter contest on account of
20 misconduct on the part of election boards or any members thereof in any of the counties of
21 the state, or on the part of any officer making or participating in a canvas for a state
22 election.

23 4. Arizona Statutes § 16-672(A)(4) authorizes a voter contest on account of
24 illegal votes.

25 5. Arizona Statutes § 16-672(A)(5) authorizes a voter contest on account of,
26 “erroneous count of votes the person declared elected...which has been declared carried,
27 did not in fact receive the highest number of votes for the office....”

28 **JURISDICTION AND VENUE**

6. The Arizona Supreme Court has jurisdiction and venue because the Plaintiff, Intervenor-Plaintiffs and Defendants reside in Arizona. Arizona Statutes § 16-672(B).

PARTIES

7. Intervenor-Plaintiff James Stevenson is a resident, elector and taxpayer of Arizona. He is also a member of the Arizona Election Integrity Association. He has standing as a resident, elector and taxpayer to bring his election contest.

8. Intervenor-Plaintiff Baron Benham is a resident, elector and taxpayer of Arizona. He is also a member of the Arizona Election Integrity Association. He has standing as a resident, elector and taxpayer to bring his election contest.

9. Intervenor-Plaintiff Lynie Stone is a resident, elector and taxpayer of Arizona. She is also a member of the Arizona Election Integrity Association. She has standing as a resident, elector and taxpayer to bring her election contest.

10. Intervenor-Plaintiff Jessica Chambers is a resident, elector and taxpayer of Arizona. She is also a member of the Arizona Election Integrity Association. She has standing as a resident, elector and taxpayer to bring her election contest.

11. Defendants are the Presidential Electors for Joseph Biden.

ULTIMATE ISSUE PRESENTED BY THE CONTROVERSY

12. Whether there is sufficient evidence to show that Arizona's election officials failed to conduct the November 3, 2020 election for Presidential Electors in accordance with the Arizona state constitution and Arizona state law casting sufficient doubt on the razor-thin margin of 10,457 to void the election result.

PETITION

I. Arizona election laws, adopted by the state legislature, are at issue in this case.

13. The Arizona General Assembly has adopted laws governing the voting for the selection of Presidential electors. Those laws provide for voting to be conducted pursuant to Arizona general election laws. Title 16 of the Official Code of Arizona.

A. Arizona has a photo identification requirement for voting.

1 14. In 2004, in order to prevent the casting of ineligible ballots due to, among
2 other reasons, fraud, the Arizona Electors approve Arizona Proposition 2000 to require the
3 presentation of proof of citizenship or photo identification when casting a ballot and for
4 election administration officials to verify the identification. A.R.S. § 16-579. The
5 Proposition was sent to Arizona electors for approval to deter the casting of ballots by
6 persons either not eligible to vote or persons fraudulently casting multiple ballots.

7 15. The Arizona General Assembly has also provided voters with the option to
8 vote by absentee processes which are set forth in very detailed and unambiguous language
9 in the Arizona statutes at A.R.S. §16-541 to 16-552.

10 **B. The Arizona Legislature authorized County Boards of Supervisors to**
11 **Administer State Election Laws.**

12 16. The Arizona Legislature authorized each county's Board of Supervisors to,
13 "Establish, abolish and change election precincts, appoint inspectors and judges of
14 elections, canvass election returns, declare the result and issue certificates thereof." A.R.S.
15 §11-251. However, nothing under Arizona's election laws authorizes County Boards of
16 Supervisors to issue any documents, make any oral determinations or instruct
17 governmental officials administering elections to perform any act contrary to Arizona law
18 governing elections.

19 **C. Arizona has a photo identification requirement for absentee voting.**

20 17. As set forth above, the Arizona electorate approved Proposition 200 in 2004
21 to require Arizona electors to require the presentation of proof of citizenship or photo
22 identification when casting a ballot and for election administration officials to verify the
23 identification. A.R.S. § 16-579. Proposition 200 passed because electors desired to deter
24 the casting of ballots by persons either not eligible to vote or persons fraudulently casting
25 multiple ballots.

26 18. Arizona's absentee voting is governed by A.R.S. § 16-541 to § 16-552.

27 19. A.R.S. § 16-542 and § 16-543 govern how Arizona electors may obtain an
28 absentee ballot.

1 **D. Arizona’s procedures for identification apply to all absentee voters.**

2 20. With respect to all absentee voters, A.R.S. § 16-545 and § 16-547 govern
3 how the clerk is to transmit an absentee ballot to the absentee elector after the clerk
4 approves the absentee voter application.

5 21. Under A.R.S. § 16-547 if the clerk approves absentee ballot application, the
6 clerk will then mail to the absentee voter an envelope containing (i) the absentee ballot
7 marked “early,” A.R.S. § 16-545, and (ii) a return envelope into which the absentee voter
8 is to place the absentee ballot.

9 22. On the front of the absentee envelope, A.R.S. § 16-547, requires the name,
10 official title and post office address of the recorder or other officer in charge of elections.
11 On the other side a printed affidavit in substantially the following form:

12 I declare the following under penalty of perjury: I am a registered voter in
13 _____ county Arizona, I have not voted and will not vote in this election in
14 any other county or state, I understand that knowingly voting more than once in any
15 election is a class 5 felony and I voted the enclosed ballot and signed this affidavit
16 personally unless noted below.

17 If the voter was assisted by another person in marking the ballot, complete the
18 following:

19 I declare the following under penalty of perjury: At the registered voter's request I
20 assisted the voter identified in this affidavit with marking the voter's ballot, I
21 marked the ballot as directly instructed by the voter, I provided the assistance
22 because the voter was physically unable to mark the ballot solely due to illness,
23 injury or physical limitation and I understand that there is no power of attorney for
24 voting and that the voter must be able to make their selection even if they cannot
25 physically mark the ballot.

26 Name of voter assistant: _____

27 Address of voter assistant: _____

28 23. Additional instructions will be included from the county recorder warning

absentee voters that, “In order to be valid and counted, the ballot and affidavit must be delivered to the office of the county recorder or other officer in charge of elections or may be deposited at any polling place in the county no later than 7:00 p.m. on election day.”

24. Pursuant to A.R.S. § 16-550, “On receipt of the envelope containing the early ballot and the ballot affidavit, the county recorder or other officer in charge of elections shall compare the signatures thereon with the signature of the elector on the elector's registration record. If the signature is inconsistent with the elector's signature on the elector's registration record, the county recorder or other officer in charge of elections shall make reasonable efforts to contact the voter, advise the voter of the inconsistent signature and allow the voter to correct or the county to confirm the inconsistent signature. The county recorder or other officer in charge of elections shall allow signatures to be corrected not later than the fifth business day after a primary, general or special election that includes a federal office or the third business day after any other election. If satisfied that the signatures correspond, the recorder or other officer in charge of elections shall hold the envelope containing the early ballot and the completed affidavit unopened in accordance with the rules of the secretary of state.”

25. Under A.R.S. § 16-551, the Arizona Legislature allows for the creation of Early Ballot Boards to process early votes. Under A.R.S. § 16-552 the Arizona Legislature established a clear and efficient process for challenging and curing early ballots. Arizona electors may make challenges of early votes under A.R.S. § 16-591. When Early Ballot Boards address the challenge:

Within twenty-four hours of receipt of a challenge, the early election board or other officer in charge of early ballot processing shall mail, by first class mail, a notice of the challenge including a copy of the written challenge, and also including the time and place at which the voter may appear to defend the challenge, to the voter at the mailing address shown on the request for an early ballot or, if none was provided, to the mailing address shown on the registration rolls. Notice shall also be mailed to the challenger at the address listed on the written challenge and provided to the

1 county chairman of each political party represented on the ballot. The board shall
2 meet to determine the challenge at the time specified by the notice but, in any
3 event, not earlier than ninety-six hours after the notice is mailed, or forty-eight
4 hours if the notifying party chooses to deliver the notice by overnight or hand
5 delivery, and not later than 5:00 p.m. on the Monday following the election. The
6 board shall provide the voter with an informal opportunity to make, or to submit,
7 brief statements regarding the challenge. The board may decline to permit
8 comments, either in person or in writing, by anyone other than the voter, the
9 challenger and the party representatives. The burden of proof is on the challenger to
10 show why the voter should not be permitted to vote. The fact that the voter fails to
11 appear shall not be deemed to be an admission of the validity of the challenge. The
12 early election board or other officer in charge of early ballot processing is not
13 required to provide the notices described in this subsection if the written challenge
14 fails to set forth at least one of the grounds listed in section 16-591 as a basis for
15 the challenge. In that event, the challenge will be summarily rejected at the meeting
16 of the board. Except for election contests pursuant to section 16-672, the board's
17 decision is final and may not be appealed.”

18 **II. Arizona’s election officials violated state law under A.R.S. § 16-672.**

19 **1. Mark Zuckerberg, through a non-profit, gave Maricopa County nearly \$3**
20 **million USD to conduct the federal election as Zuckerberg’s non-profit entity requires.**

21 26. Maricopa County entered into an agreement with a non-profit organization,
22 Center for Tech and Civic Life (“CTCL”), an organization created in 2012 and funded with
23 \$350 million USD by Facebook billionaire Mark Zuckerberg, a well-known Democratic
24 activist and partisan, to take millions of dollars from CTCL to conduct the November 3,
25 2020 election in violation of Arizona law.

26 27. Moreover, specifically with respect to elections, only the Arizona Secretary
27 of State can take in monies from sources other than taxation and that is limited to applying
28 for a federal grant under Arizona’s Election Plan created under the Help America Vote Act

1 (“HAVA”). A.R.S. § 16-142 provides that only the Arizona Secretary of State can seek
2 funds from the federal government under HAVA.

3 28. Arizona adopted a plan in 2003 pursuant to the federally enacted Help
4 America Vote Act (“HAVA”). Pursuant to Section 3 of the HAVA plan, each election
5 commission was “required to conduct regular training and administer examinations to
6 ensure that individuals who are certified are knowledgeable concerning their authority and
7 responsibilities.” Using HAVA volunteers is a violation of Arizona’s HAVA plan.

8 29. In October 2020, Maricopa County entered into agreement with CTCL to
9 take “as a gift” \$3 million USD from CTCL (“CTCL Agreement”).

10 30. Pursuant to the terms of the CTCL Agreement, Maricopa County would be
11 required to remit back to CTCL the entire \$3 million USD “gift” if CTCL in its sole
12 discretion determines that the county has not complied with the CTCL Agreement. The
13 CTCL Agreement provide that the purpose of the funds was to be used exclusively for the
14 public purpose of planning safe and secure election administration in Maricopa County.
15 Thus, pursuant to the CTCL Agreement, CTCL could direct the election officials to
16 conduct the election in ways CTCL wanted and, if the Maricopa County election officials
17 did not comply, CTCL could force Maricopa County to refund the \$3 million.

18 31. On October 21, 2020, the Maricopa County Board of Supervisors approved
19 acceptance of the grant from the CTCL at the recommendation from the Fulton County
20 Registration and Elections Division. Among other things, Maricopa County agreed with
21 CTCL to use the monies to:

- 22 • Hire additional personnel for elections;
- 23 • Increase existing salaries for staff;
- 24 • Encourage and Increase Absentee Voting (By Mail and Early, In-Person);
- 25 • Provide assistance to help voters comply with absentee ballot requests & certification
- 26 requirements;
- 27 • Utilize secure drop-boxes to facilitate return of absentee ballots
- 28 • Deploy additional staff and/or technology improvements to expedite & improve

- 1 accuracy of absentee ballot processing;
- 2 • Expand In-Person Early Voting (Including Curbside Voting); and
- 3 Commit “to conducting the necessary voter outreach and education to promote
- 4 absentee voting and encourage higher percentages of our electors to vote absentee.”

5 32. Maricopa County and CTCL knew in 2020 that Democrat voters would be

6 voting primarily by absentee vote which is why the County and CTCL aggressively

7 “promoted,” “encouraged” and overzealously solicited” voters to vote absentee—including

8 eliminating absentee ballot security requirements.

9 **2. The Center for Tech and Civic Life created a disparate impact in the**

10 **treatment of voters in Arizona through their grants to local municipalities.**

11 33. CTCL provided a \$6.3 million grant for election administration to Maricopa

12 County, Arizona.

13 34. CTCL provided grants to at least a dozen generally democratic Arizona

14 counties to develop their election administration.

15 35. This meant that counties that were unaware of these grants were unable to

16 access the funds and were unable to provide similar access and technology to their electors

17 for the 2020 federal general election.

18 36. CTCL put out a statement regarding the ways they intended grant recipients

19 to improve their voting access compared to other localities. These actions were under 4

20 broad categories.

21 a. Making Voting Safe

- 22 1. Designated Polling Locations for Voters with COVID-19
- 23 2. Partnering with Sports Arenas
- 24 3. Controlling Long Lines
- 25 4. Hand Delivering Ballots
- 26 5. Reaching Voters in Nursing Homes
- 27 6. Promoting Curbside Voting
- 28 7. Expanding Vote-By-Mail Options

- b. Engaging Historically Disenfranchised Populations
 1. Registering Voters Serving Out Felony Sentences
 2. Offering In-Person Voting for Incarcerated Individuals
 3. Educating Ex-Felons and Incarcerated Individuals
 4. Supporting Voters who Speak English as a Second Language
 5. Offering Late-Night Voting Options
 6. Educating Native Americans
- c. Supporting Voters with Disabilities
 1. Expanding American Sign Language Resources
 2. Offering Private and Independent Voting Options
 3. Developing Online Voting Portals
 4. Partnering with Disability Rights Groups
- d. Improving Access for Displaced Voters
 1. Providing Critical Information on Election Websites
 2. Implementing Mobile Voter Sites
 3. Supporting People Experiencing Homelessness

37. CTCL only made this money and services available to certain counties. Moreover, CTCL only increases access to these options if the local municipality agrees to run the election according to CTCL preferences.

38. Consequently, disparate impact occurs because numerous electors in the State of Arizona were not able to benefit from CTCL's private federal election grants making it easier to vote in-person and absentee.

3. Arizona's election officials did not enforce state law residency requirements on voters who changed addresses before the November 3, 2020 election.

39. Arizona Statutes require that its election officials enforce residency requirements on voters.

40. Arizona election officials had residency information to verify that an actual person was voting according to their residence.

1 41. Arizona election officials violated Arizona Statutes in not applying this
2 change of address information to enforce residency requirements on voters who changed
3 residency before the November 3, 2020 election.

4 **4. Arizona’s election officials did not enforce state law residency requirements on**
5 **voters who changed addresses before the November 3, 2020 election.**

6 42. Arizona Statutes require that its election officials enforce residency
7 requirements on voters.

8 43. Arizona election officials had residency information to verify that persons
9 residing out of state voted in Arizona.

10 44. Arizona election officials violated Arizona Statutes in not applying
11 residency requirements on voters who lived out of state who voted in Arizona.

12 **5. Arizona’s election officials did not enforce state law against double voting.**

13 45. Arizona law requires that its election officials enforce the prohibition on
14 one person voting more than once.

15 46. Arizona election officials have access to information to prevent double
16 voting.

17 47. Arizona election officials violated Arizona law in not applying this
18 information to enforce Arizona’s prohibition on double voting before the November 3,
19 2020 election.

20 **III. The government’s data confirms the illegal votes counted and legal votes not counted**
21 **are over 300,000 exceeding the 10,457 margin in the Presidential contest.**

22 48. The government’s data confirms the illegal votes counted and legal votes
23 not counted are over 300,000 exceeding the 10,457 vote margin in the Presidential contest.

24 49. The estimate of ballots requested in the name of a Republican by someone
25 other than that person is 204,586.

26 50. The estimate of Republican ballots that the requester returned but were not
27 counted is 75,033.

28 51. The estimate of Electors voting where they did not reside is 19,997.

1 52. The estimate of out-of-state residents voting in Arizona is 5,790.
2 53. The estimate of illegal double votes by a single person in Arizona is 157.
3 54. The estimated total of illegal votes counted and legal votes not counted is
4 305,563.

5 **IV. The administration of Arizona's election violated state and federal law.**

6 55. Arizona election officials' material violations of Arizona election law
7 placed the results of a close Presidential election in Arizona in doubt and are null and void,
8 as a matter of law.

9 56. Arizona election officials' material violations of Arizona election law
10 violated the voters due process rights under the state constitution and constituted and
11 placed the results of a close Presidential election in Arizona in doubt and are null and void,
12 as a matter of law.

13 57. Arizona election officials' material violations of Arizona election law
14 violated the voters equal protection rights under the state constitution and placed the results
15 of a close Presidential election in Arizona in doubt and are null and void, as a matter of
16 law.

17 58. Arizona election officials violated the Elections Clause and Electors Clause
18 of the United States Constitution and placed the results of a close Presidential election in
19 Arizona in doubt and are null and void, as a matter of law.

20 59. Since the election result is legally null and void, the State of Arizona should
21 be enjoined from certifying the election result so that the Arizona General Assembly can
22 lawfully appoint the electors.

23 60. The Governor of the State of Arizona should be enjoined to certify the
24 Presidential electors under 3 U.S.C. § 6 appointed by the Arizona General Assembly.

25 **WHEREFORE, THE INTERVENOR-PLAINTIFFS PRAY:**

26 1. That the Court **ISSUES** a declaratory judgment that Arizona election
27 officials' material violations of Arizona election law placed the results of a close Presidential
28 election in Arizona in doubt and are null and void, as a matter of law;

1 2. That the Court **ISSUES** a declaratory judgment that Arizona election
2 officials' material violations of Arizona election law violated the voters' due process rights
3 under the state constitution and constituted and placed the results of a close Presidential
4 election in Arizona in doubt and are null and void, as a matter of law;

5 3. That the Court **ISSUES** a declaratory judgment that Arizona election
6 officials' material violations of Arizona election law violated the voters' equal protection
7 rights under the state constitution and placed the results of a close Presidential election in
8 Arizona in doubt and are null and void, as a matter of law;

9 4. That the Court **ISSUES** a declaratory judgment that Arizona election officials
10 violated the Elections Clause and Electors Clause of the United States Constitution;

11 5. That the Court **ISSUES** an injunction enjoining Maricopa County, the
12 Secretary of State or any election body in the State of Arizona from certifying the election
13 so that the Arizona General Assembly can lawfully appoint the electors;

14 6. That the Court **ISSUES** an injunction requiring the Governor of the State of
15 Arizona to certify the Presidential electors under 3 U.S.C. § 6 appointed by the Arizona
16 General Assembly; **AND**

17 7. That the Court **GRANTS** any other relief the Court **DEEMS** just and proper.

18 **RESPECTFULLY SUBMITTED** this 2nd day of December, 2020

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