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8 ATTORNEYS FOR INTERVENOR-
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**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

**MOTION TO INTERVENE UNDER
RULE 24**

JUDGE RANDALL H. WARNER

Proposed Intervenor-Plaintiffs, James Stevenson, Baron Benham, Lynie Stone, and Jessica Chambers, by and through their counsel, hereby move the Court in accordance with Arizona Rule of Civil Procedure for the Superior Courts 24(a) to intervene in this action as additional Plaintiffs. In support of this motion, Proposed Intervenor-Plaintiffs state as follows:

1. On November 24, 2020, Plaintiff initiated this action by filing their Statement of Election Contest Pursuant to A.R.S. § 16-673 in Maricopa County Superior

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Court.

2. This action arises from Plaintiff’s election contest based on election officials’ refusal to allow legal observers to observe signature –verification constitutes “misconduct on the part of...officer[s] making or participating in a canvass for state election,” pursuant to A.R.S. § 16-672(A)(1). Without legal observation, the result of the electoral contest is fundamentally uncertain.
3. Without examination of the signed envelopes through a court ordered inspection under A.R.S. § 16-677, Plaintiff has no way of knowing whether falsely or insufficiently verified ballots were counted.
4. Intervenor-Plaintiffs engaged in a separate investigation to discover additional election contest violations under A.R.S. § 16-672. Intervenor-Plaintiffs discovered several additional instances of disparate impact treatment of electors in areas where private corporate money was not made available to election clerks.
5. In addition, Intervenor-Plaintiffs engaged in a statistical analysis that determined Arizona’s election officials did not enforce state law residency requirements on voters who changed addresses, moved out of state, or double voted before the November 3, 2020 election. Further, numerous requested absentee ballots were requested from election officials that were not requested by the actual named person on the ballot.
6. The government’s data confirms the illegal votes counted and legal votes not counted are over 300,000, far exceeding the 10,457 margin in the Presidential contest.
7. Under Arizona law, Rule 24(a) provides that anyone shall be permitted to intervene in an action:
 - (1) [W]hen a statute confers an unconditional right to intervene; or (2)
 - when the applicant claims an interest relating to the property or transaction which is the subject of the action and the applicant is so situated that the disposition of the action may as a practical matter

1 impair or impede the applicant's ability to protect that interest, unless
2 the applicant's interest is adequately represented by existing parties.

3 *See also William Z. v. Ariz. Dep't of Econ. Sec.*, 192 Ariz. 385, 387, ¶ 8, 965
4 P.2d 1224, 1226 (App.1998).

5 8. Additional grounds and reasons are set forth in the separate memorandum
6 supporting this motion.

7 9. WHEREFORE, Intervenor-Plaintiffs, James Stevenson, Baron Benham,
8 Lynie Stone, and Jessica Chambers respectfully request that (a) the Court set
9 this Motion to Intervene for hearing at or before any further proceedings and
10 (b) grant this Motion to Intervene and enter an order joining Intervenor-
11 Plaintiffs to this action as additional Plaintiffs. That the Court **GRANTS** any
12 other relief the Court **DEEMS** just and proper.

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

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