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9 **IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA**
10 **IN AND FOR THE COUNTY OF MARICOPA**

11 KARI LAKE FOR ARIZONA, an Arizona political
12 committee,

13 Plaintiff,

14 v.

15 STEPHEN RICHER, in his official capacity as the
16 Maricopa County Recorder; REY VALENZUELA,
17 in his official capacity as the Maricopa County
18 Director of Elections for Election Services and
19 Early Voting; SCOTT JARRETT, in his official
20 capacity as the Maricopa County Director of
21 Elections for Election Day and Emergency Voting;
22 BILL GATES, CLINT HICKMAN, JACK
23 SELLERS, THOMAS GALVIN, AND STEVE
24 GALLARDO, in their official capacities as
25 members of the Maricopa County Board of
26 Supervisors; and MARICOPA COUNTY;

27 Defendants.

No. _____

**VERIFIED SPECIAL ACTION
COMPLAINT**

(Show Cause Hearing Requested)

1 Plaintiff Kari Lake for Arizona brings this special action to compel the prompt
2 production of public records¹ pursuant to the Arizona Public Records Act, A.R.S. § 39-121,
3 *et seq.* (“PRA”).

4 Plaintiff desires that every lawful vote be properly counted and every voter who was
5 eligible to vote be allowed to vote. Unfortunately, due to Defendants’ failures, many eligible
6 voters may not have been able to vote. Because Defendants were unable or unwilling to
7 conduct a reconciliation of voter check ins against ballots cast of each polling center on
8 election night in accordance with Arizona law and have now unlawfully refused to produce
9 public records in response to two public records requests regarding how they administered
10 the election, Plaintiff cannot determine that every lawful vote will be properly counted. The
11 records Plaintiff requested in response to the numerous issues with Defendants’
12 administration of the election are consistent with a parallel demand by the Arizona Attorney
13 General for answers to questions about the Defendants’ actions.

14 Plaintiff hereby alleges as follows:

15 **SUMMARY OF THE CASE**

16 1. The courts of this state have “the duty of insuring that the constitutional and
17 statutory provisions protecting the electoral process (*i.e.*, the manner in which an election
18 is held) are not violated.” *Tilson v. Mofford*, 153 Ariz. 468, 470 (1987).

19 2. Following a series of failures in Defendants’ administration of the election,
20 Plaintiff, through Kari Lake’s attorney of record, has requested from the Defendants the
21 production of public records relating to the general election that took place on November 8,
22 2022. *See* Exhibit 1 & 2. Given instances of misprinted ballots, the commingling of counted
23 and uncounted ballots, and long lines discouraging people from voting, as demonstrated in
24 the attached declarations, these records are necessary for Plaintiff to determine the full
25 extent of the problems identified and their impacts on electors.

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¹ As the definitions of “records” and “other matters” have essentially merged, the term records, as used in this action, should be construed as encompassing other matters.

1 3. Because the law allows the public and the plaintiff only a short period of time
2 in the context of an election to seek relief from the courts for violations of their rights, the
3 Defendants' unlawful failure to produce the records of their actions promptly has prejudiced
4 Plaintiff and is preventing the courts from performing their duty. Therefore, this court
5 should require that the Defendants produce the requested records prior to the canvassing of
6 the election.

7 4. If the Defendants do not produce the records prior to the canvassing of the
8 election, then they will have not acted promptly as required by the Arizona Public Records
9 Act, which provides that "access to a public record is deemed denied if a custodian fails to
10 **promptly** respond to a request for production of a public record." A.R.S. § 39-121.01(E)
11 (emphasis added). As explained below, the meaning of "promptly" is determined under the
12 circumstances. In this case, "promptly" must mean sufficiently in advance of the canvassing
13 to permit Plaintiff and the court to quickly determine the full extent of the problems
14 identified and their impacts on electors due to the numerous documented failures in the
15 Defendants' administration of the election.

16 5. Plaintiff lacks an equally plain, speedy and adequate remedy at law, and
17 special action relief is necessary to ensure that the Defendants discharge the
18 nondiscretionary duties imposed upon them by Arizona law.

JURISDICTION

19
20 6. This Court has jurisdiction over this action pursuant to Article 6, § 14 of the
21 Arizona Constitution, A.R.S. §§ 12-2021, 39-121.02, and Arizona Rule of Special Action
22 Procedure 4.

23 7. Venue lies in Maricopa County pursuant to Arizona Rule of Special Action
24 Procedure 4(b) and pursuant to A.R.S. § 12-401(16) because the Defendants hold office in
25 that county.
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PARTIES

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2 8. Plaintiff Kari Lake for Arizona is an Arizona political committee that is
3 registered with the Arizona Secretary of State. Kari Lake for Arizona is the authorized
4 campaign committee of Kari Lake, a candidate for Governor of Arizona in the November
5 8, 2022 general election.

6 9. Defendant Stephen Richer is the Recorder of Maricopa County and is named
7 in this action in his official capacity only. Defendant Richer is the officer in charge of
8 elections in Maricopa County. The County Recorder is an “officer” within the meaning of
9 A.R.S. § 39-121.01(A)(1). Upon information and belief, the County Recorder has custody,
10 and is responsible for the preservation, maintenance and care, of some or all the public
11 records requested by Plaintiff.

12 10. Defendant Rey Valenzuela is the Director of Elections for Election Services
13 and Early Voting in Maricopa County, and is named in this action in his official capacity
14 only. Director Valenzuela is an “officer” within the meaning of A.R.S. § 39-121.01(A)(1).
15 Upon information and belief, Director Valenzuela has custody, and is responsible for the
16 preservation, maintenance and care, of some or all the public records requested by Plaintiff.

17 11. Defendant Scott Jarrett is the Director of Elections for Election Day and
18 Emergency Voting in Maricopa County, and is named in this action in his official capacity
19 only. Director Jarrett is an “officer” within the meaning of A.R.S. § 39-121.01(A)(1). Upon
20 information and belief, Director Jarrett has custody, and is responsible for the preservation,
21 maintenance and care, of some or all the public records requested by Plaintiff.

22 12. Maricopa County is a political subdivision of the State of Arizona. Maricopa
23 County is charged by law with various duties under the PRA and charge by law with
24 conducting elections within its jurisdictional boundaries, including through its Board of
25 Supervisors, appointing inspectors, marshals and judges to staff polling places on Election
26 Day, and appointing certain Central Counting Boards. *See* A.R.S. §§ 11-251(3), 16-531;
27 EPM at pp. 196–212. The Maricopa County Board of Supervisors is a “public body” within
28 the meaning of A.R.S. § 39-121.01(A)(2). The Maricopa County Board of Supervisors has

1 custody, and is responsible for the preservation, maintenance and care, of some or all the
2 public records requested by Plaintiff, and its members are likewise sued here in their official
3 capacities.

4 **GENERAL ALLEGATIONS**
5 **The Printer/Tabulator Problem**

6 13. Maricopa County had 223 polling centers open on Election Day.

7 14. Of these 223 polling centers, upon information and belief, at least 118 polling
8 centers, or 53%, had experienced problems when the County's ballot printers produced ballots that
9 were not printed darkly enough for the County's vote tabulation machines to read the ballots. (See
10 Decl. Sonnenklar Ex. e, ¶ 13; Decl. Patrick Ex. 4, ¶ 8-9).

11 15. The Defendants failed to detect, prevent or timely remedy this problem during setup
12 and testing of their polling stations. Although poll workers tested the printers, according to
13 observers they did not test whether the tabulators could read the test print. (See Decl. Alford Ex. 5,
14 ¶ 5).

15 16. Based upon information and belief, the following polling centers appear to have had
16 a printer/tabulator problem:

- 17 a. Buckeye City Hall
- 18 b. Altrain Medical and Dental Assisting Academy
- 19 c. Biltmore Fashion Park
- 20 d. Buckeye Fire Station 704
- 21 e. Carefree Town Council Center
- 22 f. Cave Creek Town Hall
- 23 g. Dayspring United Methodist Church
- 24 h. Deer Valley Unified School District Office
- 25 i. Envision Community Center
- 26 j. Estrella Mountain Community College
- 27 k. Fountain Hills Community Center

- 1 l. Glendale Community College/Student Union
2 m. Mountain Park Health Center
3 n. Outlets at Anthem
4 o. Radiant Church Sun City
5 p. San Tan Village
6 q. Shadow Rock Congregational Church
7 r. Union Elementary School/District Office
8 s. Wickenburg Community Center
9 t. Youngtown Clubhouse
10 u. Asante Library
11 v. Black Mountain Baptist Church
12 w. Burton Barr Library
13 x. Camelback Christian Church
14 y. Chandler Bible Church
15 z. Church of Jesus Christ of LDS/Mesa Maricopa Stake
16 aa. Compass Church
17 bb. Copper Hills Church/Westwing
18 cc. Desert Christian Fellowship
19 dd. Eldorado Park Community Center
20 ee. Estrella Mtn School/Goodyear
21 ff. First United Methodist Church of Gilbert
22 gg. GCC North Chinle Bldg
23 hh. Glendale Christian Church
24 ii. Grace in the Desert Adventist Church
25 jj. Happy Trails Resort
26 kk. Islamic Center of the East Valley
27 ll. Laveen Elementary School District Office
28 mm. Lifeway Church

- 1 nn. Light and Life Church
- 2 oo. Litchfield Park First Baptist Ch
- 3 pp. Love of Christ Lutheran Chr
- 4 qq. Marley Park
- 5 rr. Memorial Presbyterian Church
- 6 ss. Mesa Baptist Church
- 7 tt. Mesquite Groves Aquatic Center
- 8 uu. North Phoenix Baptist Church PV Campus
- 9 vv. North Scottsdale United Methodist Church
- 10 ww. Nozomi Aquatic Center
- 11 xx. Oasis Community Church
- 12 yy. Salt River Pima Community Center
- 13 zz. Scottsdale Elks Lodge PBOE #2148
- 14 aaa. Shepherd of the Hills United Church of Christ
- 15 bbb. Sheriffs Posse of Sun City West
- 16 ccc. St. Margaret's Catholic Church
- 17 ddd. Standing Stones Community Church
- 18 eee. Tumbleweed Recreation Center
- 19 fff. Velda Rose United Methodist Church
- 20 ggg. Victory Lutheran Church
- 21 hhh. Worship & Word Church
- 22 iii. Academies at South Mountain
- 23 jjj. Aire Libre School
- 24 kkk. Ascension Lutheran Church
- 25 ll. Cactus High School
- 26 mmm. Calvary Free Lutheran Ch
- 27 nnn. Central Christian Church/Mesa
- 28 ooo. Chandler Nature Center

- 1 ppp. Charles W Harris School
- 2 qq. Church of Jesus Christ of LDS Buckeye
- 3 rrr. Church of Jesus Christ of LDS Jomax
- 4 sss. Church of Jesus Christ of LDS Southern
- 5 tt. Church of Jesus Christ of LDS Union Hills
- 6 uuu. Community of Christ
- 7 vvv. Community of Christ Church
- 8 www. Cooper Canyon School
- 9 xxx. Cottonwood Country Club
- 10 yyy. David Crockett School
- 11 zzz. Deer Valley Airport
- 12 aaaa. Desert Hills Community Church
- 13 bbbb. Dist 6 Community Service Center
- 14 cccc. Dove of the Desert United Methodist Chr
- 15 dddd. Dream City Church Phoenix Campus
- 16 eeee. Dream City Church Scottsdale Campus
- 17 ffff. Escalante Community Center/Tempe
- 18 gggg. Estrella Foothills High School #201
- 19 hhhh. Faith Baptist Church
- 20 iii. Gateway Fellowship Chr/Sbc
- 21 jjj. Gilbert Freestone Frec Center
- 22 kkkk. Holiday Park School
- 23 lll. Holy Trinity Greek Orthodox Cathedral
- 24 mmmm. Islamic Center – Scottsdale
- 25 nnnn. Journey Church
- 26 oooo. Lakes Rec Ctr @ Westbrook Village
- 27 pppp. Laveen Baptist Church
- 28 qqqq. Madison Baptist Church

- 1 rrrr. Messinger Mortuary
- 2 ssss. Mountain View Park Comm Ctr
- 3 tttt. Mountain View School
- 4 uuuu. Palm Lane School
- 5 vvvv. Peace Lutheran Church
- 6 wwww. Queen Creek Library
- 7 xxxx. SE Regional Library/Gilbert
- 8 yyyy. Sevilla Elementary School
- 9 zzzz. Shadow Mountain High School
- 10 aaaaa. Skyway Church – West Valley
- 11 bbbbb. St. Nikolas Serbian Orthodox Church
- 12 ccccc. Sun lakes United Methodist Church
- 13 ddddd. Sunland Village East
- 14 eeeee. Tomahawk School
- 15 fffff. Trilogy @ Power Ranch
- 16 ggggg. Trinity Bible Church of Sun City West
- 17 hhhhh. University Presbyterian Church
- 18 iiiii. Valley Baptist Chr/Tonopah
- 19 jjjjj. Valor Christian Center
- 20 kkkkk. Venue 8600
- 21 lllll. Via Linda (Scottsdale) Senior Center
- 22 mmmmm. Vineyard Church of North Phoenix
- 23 nnnnn. Youngker High School #201

24 17. Because of the printer/tabulator problems, the polling locations were chaotic, voters
25 were frustrated, and voters had to endure long lines. (See Decl. Sonnenklar Ex. 3, ¶ 8; Decl. Marple
26 Ex. 6, ¶ 7; Decl. Prince Ex. 7, ¶ 6-7; Decl. O’Toole Ex. 8, ¶ 6-7; Decl. Buser Ex. 9, ¶ 9; Decl.
27 Lasham Ex. 10, ¶ 7; Decl. Tatom Ex. 11, ¶ 6; Decl. Liles Ex. 12, ¶ 7; Decl. Rathbun Ex. 13, ¶ 7;
28 Decl. Woodburn Ex. 14, ¶ 7; Decl. Raboin Ex. *15, ¶ 5; Decl. Mettler Ex. 16, ¶ 5; and Decl. Payne

1 Ex. 17, ¶ 110. The County regularly updates on Election Day, its online listing of polling places,
2 including wait times. Those public records would provide additional information with regard to
3 the lines and wait times.

4 18. Many poll workers attempted to call the County hotline but were unable to timely
5 reach a tech person to fix the printer/tabulators. (See Decl. Sonnenklar Ex. 3, ¶ 27; Decl. Alford
6 Ex. 5, ¶ 10; Decl. Liles Ex. 12, ¶ 7; and Decl. Payne Ex. 17, ¶ 8).

7 19. Even when technical support was reached, poll workers were told that they did not
8 know how to fix the problem. (See Decl. Woodburn Ex. 14, ¶ 7).

9 20. Some poll workers ended up encouraging voters to go to different polling centers to
10 vote. (See Decl. Lasham Ex. 10, ¶ 7; and Decl. Damon Ex. 18, ¶ 17).

11 21. Many voters left without voting. (See Decl. Lasham Ex. 10, ¶ 7; Decl. Liles Ex. 12,
12 ¶ 7; Decl. Mettler Ex. 16, ¶ 9; Decl. Payne Ex. 17, ¶ 11; and Decl. Weiman Ex. 19, ¶ 10).

13 22. When a tabulator was unable to read a ballot, the voter was given the option to spoil
14 the ballot and vote again or they could put the ballot in “door #3.” (See Decl. Rathbun Ex. 13, ¶ 7;
15 Decl. Woodburn Ex. 14, ¶ 7; and Decl. Lindberg Ex. 20, ¶ 7).

16 23. Based upon information and belief, “door #3” was the bin that voters could place
17 their ballots into and these ballots would be tabulated at Maricopa County Tabulation and Election
18 Center (“MCTEC”).

19 24. Things were so chaotic that poll workers were unable to watch the voters feed their
20 ballots through the tabulator. (See Decl. Liles Ex. 12, ¶ 7). Poll workers were pulled in so many
21 different directions that one poll worker did not have the time to mark “spoiled” on original ballots.
22 (See Decl. Sonnenklar Ex. 3, ¶ 17).

23 25. As a result of the printer/tabulator problem, many voters were in fear of their vote
24 not being counted. (See Decl. Liles Ex. 12, ¶ 7).

25 26. This problem with the printer/tabulator never needed to occur because as early as
26 November 2, 2022, a manager at MCTEC discovered that some of the printers were printing faded
27 timing marks and the tabulators were not able to read those ballots. (See Decl. Patrick Ex. 4, ¶ 8-
28 9).

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Problems with Ensuring Every Legal Ballot is Counted

27. Many poll observers saw poll workers mix counted and uncounted ballots in the same container at the end of the night. (See Decl. Mettler Ex. 16, ¶ 10; Decl. Lindberg Ex. 20, ¶ 7; and Decl. Blankenship Ex. 21, ¶ 8).

28. According to the 2019 Elections Procedures Manual which governs this election, “the election board must conduct an audit to ensure that the number of voters who signed in on the signature roster or e-pollbook matches the number of ballots cast, including regular and provisional ballots and, if the accessible voting equipment independently tabulates votes, any votes cast on the accessible voting equipment, A.R.S. § 16-602(A)”. (Relevant Pages are attached as Exhibit 22, p. 192).

29. However, when asked on Election Night, many poll workers were unable to provide the observers with the number of voters who signed in on the signature roster or e-pollbook and therefore could not determine if those numbers matched the numbers of ballots cast. (See Decl. Marple Ex. 6, ¶ 7; Decl. Prince Ex. 7, ¶ 9; Decl. O’Toole Ex. 8, ¶ 8; Decl. Buser Ex. 9, ¶ 7; Decl. Woodburn Ex. 14, ¶ 7; Decl. Mettler Ex. 16, ¶ 11; and Decl. Blankenship Ex. 21, ¶ 9).

30. The canvass shall occur no “more than twenty days following the election,” *unless* “the returns from any polling place in the election district where the polls were opened and an election held are found to be missing.” A.R.S. § 16-642(A). In that case, “the canvass shall be postponed from day to day until all the returns are received or until six postponements have been had.” A.R.S. § 16-642(C).

31. In addition, there are numerous reports of voters who left the voting center without voting because the tabulators continued to reject the voters’ ballots. (*Id.* ¶ 22). The returns for those voters are deemed “missing.”

32. Defendants violated A.R.S. § 16-602(A) and Defendants have further compounded this problem by refusing to respond to Plaintiff’s Public Records Request (*see infra*).

33. In addition, based upon information and belief, Palm Ridge Recreational Center had over two bags of ballots that had been dropped off in Door #3 after the tabulators failed to count

1 their ballots. However, the County claims that there were only eighteen Door #3 ballots attributable
2 to this polling center.

3 34. Furthermore, based upon information and belief, Plaintiff has been informed that
4 certain ballots are not being counted at MCTEC because the blue ink used by the voter to mark
5 their preference was too light for the tabulators.

6 **Public Records Requests**

7 35. The first request was submitted on November 15, 2022 (the “First Records
8 Request”) for the following public records:

- 9 a. “All public records related to voters who checked in to a vote center on
10 Election Day in the sitebook, and who also submitted a mail ballot on
11 Election Day, where the mail ballot was not counted, including names
12 and all available contact information for these electors.”
- 13 b. “All public records related to voters casting drop-offs ballots that were
14 rejected due to voter submitting another ballot that day including names
15 and all available contact information for these electors.”
- 16 c. “All public records related to the number of voters who tried to check in
17 at two different voting centers on Election Day and were (a) permitted to
18 cast a provisional ballot at the second site or (b) did not cast a ballot at
19 the second site.”
- 20 d. “All public records related to the adjudication rates by legislative district,
21 because the write-in candidates for legislative district 22, Arizona
22 Senate.”
- 23 e. “All public records related to the total number and names of any voter
24 who checked into a vote center that had any print malfunction of an on
25 demand printer such that ballots were placed into door 3.”
- 26 f. “All public records to the total number of ballots in every category in any
27 vote center that had any print malfunction of an on demand printer such
28 that ballots were placed in door 3.”

- 1 g. "All public records regarding the number of voided, spoiled, cancelled,
2 or uncounted for any other reason from early ballots dropped off on
3 Election Day."
4 h. "All public records regarding the total number of ballots including serial
5 number of any ballot that was duplicated in order to be tabulated as a
6 result of any print malfunction of an on demand printer such that the
7 ballots were placed into door 3."
8 i. "All public records regarding the vote centers in which door 3 overflowed
9 on Election Day causing any poll workers to utilize a means of
10 transportation and/or storage of these ballots."
11 j. "All public records regarding any commingled ballot."
12 k. "All public records regarding all regarding UOCAVA ballots and
13 verification processes for confirming these requests."

14 36. A true and correct copy of the First Records Request is attached hereto as
15 Exhibit 1.

16 37. The Defendants have not yet provided to Plaintiff the public records in
17 response to the First Records Request.

18 38. On November 16, 2022, Plaintiff submitted to the Defendants another public
19 records request (the "Second Records Request") that sought the following additional public
20 records:

- 21 a. "All communications prior to Election Day between or among County
22 employees, agents and vendors with regard to problems with tabulation
23 or printing of ballots at vote centers."
24 b. "All public records related to retabulation of votes cast in person at vote
25 centers due to commingling and/or reconciliation issues."

26 (collectively, the "Requested Records").

27 39. A true and correct copy of the Second Records Request is attached hereto as
28 Exhibit 2.

1 40. The Second Records Request sets forth in detail the reasons for the requests,
2 putting Defendants on notice that the circumstances demanded they provide an immediate
3 response.

4 41. To date, the Defendants have not produced or made available the public
5 records in response to the Second Records Request.

6 42. Public records requests must be fulfilled “promptly.” A.R.S. § 39-
7 121.01(D)(1).

8 43. Upon information and belief, the Defendants are scheduled to canvass the
9 election on November 28, 2022, a few days from the filing of this complaint, and the state
10 canvass would follow on December 5, 2022.

11 44. In the absence of an immediate and comprehensive production of the
12 requested public records, Plaintiff cannot ascertain the full extent of the problems identified
13 and their impacts on electors.

14 45. Defendants should be required to produce the records prior to the canvassing
15 of the election. This deadline (or its substantial equivalent) is, under the circumstances
16 presented, necessary to ensure that vital public records are furnished promptly and that
17 apparent deficiencies can be remedied before canvassing of the 2022 general election.

18 **The Arizona Attorney General’s Request for Information**

19 46. On November 19, 2022, the Arizona Attorney General sent a letter to Maricopa
20 County outlining many problems with how the elections were run in the County and asked the
21 County to respond to these questions prior to canvassing the election. (Ex. 23).

22 47. On November 21 2022, Maricopa County issued a statement from Chairman Bill
23 Gates on Upcoming Canvass:

24 Maricopa County has finished counting all legal ballots cast during the November
25 General Election and will hold a public meeting to canvass the election on Monday
26 November 28. The canvass is required by law and is the full accounting of ballots
27 cast. It’s meant to provide a record of the votes counted and those that were not
28 legally cast. There will be no delays or games; we will canvass in accordance with
state law.

....

1 56. The officer or public body from whom public records are requested has the
2 burden of proving that the response was “prompt given the circumstances surrounding each
3 request.” *Phoenix New Times*, 217 Ariz. at 538–39, ¶ 15.

4 57. Undue delay in the fulfillment of a public records request constitutes a denial
5 of access to the requested records. *See Phoenix New Times*, 217 Ariz. at 547, ¶ 51.

6 58. A person who has been denied access to requested public records “may appeal
7 the denial through a special action in the superior court.” A.R.S. § 39-121.02(A).

8 59. A court in a special action proceeding may compel a public officer “to
9 perform a duty required by law as to which he has no discretion.” Ariz. R. Proc. Special
10 Actions (“RPSA”) 3(a); *see also* A.R.S. § 12-2021.

11 60. All the documents sought by the First Records Request and the Second
12 Records Request are “public records” subject to mandatory and prompt disclosure under
13 the PRA because they have a “substantial nexus” to the Defendants’ official duties and
14 activities in connection with the conduct and administration of elections in Maricopa
15 County. *See Griffis v. Pinal County*, 215 Ariz. 1, 4, ¶ 10 (2007).

16 61. Upon information and belief, there are public records in the Defendants’
17 custody that are responsive to the First Records Request and/or the Second Records
18 Request.

19 62. The Defendants have a nondiscretionary statutory duty to promptly produce
20 or make available to Plaintiff all public records sought in the First Records Request and the
21 Second Records Request.

22 63. The Defendants have not produced or made available to Plaintiff the public
23 records in response to either the First Records Request or the Second Records Request.

24 64. The Defendants’ failure to promptly produce the requested documents
25 constitutes an effective denial of access to public records and prevents Plaintiff from
26 monitoring, and challenging, election activity in the most populous county of the state.

27 65. Plaintiff is accordingly entitled to a writ of mandamus or other relief
28 compelling the prompt production of the requested public records.

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PRAYER FOR RELIEF

WHEREFORE, the Plaintiff demands relief in the following forms:

- a. A writ of mandamus or other order requiring the Defendants to immediately produce or make available to Plaintiff all public records requested in the First Records Request and/or the Second Records Request.
- b. Such other relief as the Court deems necessary, equitable, proper, and just.

DATED this 23rd day of November 2022.

By: /s/ Timothy A. La Sota
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Verification

I, Caroline Wren, depose and say:

I have read the foregoing Verified Special Action Complaint and know the contents thereof by personal knowledge. I know the allegations of the Verified Special Action Complaint to be true, except the matters therein on information and belief, which I believe to be true.

Signed under penalty of perjury on this 23rd day of November 2022.

Caroline Wren

Caroline Wren

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