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**to be admitted pro hac vice*

Attorneys for Contestant-Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

Kari Lake, Contestant/Plaintiff, v. Katie Hobbs, personally as Contestee and in her official capacity as Secretary of State; Stephen Richer in his official capacity as Maricopa County Recorder; Bill Gates, Clint Hickman, Jack Sellers, Thomas Galvin, and Steve Gallardo, in their official capacities as members of the Maricopa County Board of Supervisors; Scott Jarrett, in his official capacity as Maricopa County Director of Elections; and the Maricopa County Board of Supervisors, Defendants/Contestees.	**Case No. CV2022-095403** **(Honorable Peter Thompson)** **CONTESTANT/PLAINTIFF'S EXPERT DISCLOSURE STATEMENT**

Pursuant to this Court's May 8, 2023, Scheduling Order, Contestant/Plaintiff, by and through undersigned counsel, hereby submits her Expert Disclosure Statement.

1. Erich J. Speckin
Speckin Forensics, LLC
c/o Kurt Olsen and Bryan Blehm

Blehm Law PLLC
10869 N. Scottsdale Rd., 103256
Scottsdale, AZ 85254
602-753-6213

Mr. Speckin will offer testimony generally in the area of signature verification processes and time study analysis of signature verification. It is also expected that Mr. Specken will comment on and respond to opinions and testimony offered by experts and fact witnesses. Mr. Specken's education, experience and qualifications are set forth and described in the enclosed C.V. attached as Exhibit A. The subjects of Mr. Specken's testimony, his opinions, and the basis for those opinions, are attached hereto as Exhibit B.

RESPECTFULLY SUBMITTED this 12th day of May 2023.

/s/Bryan James Blehm
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ORIGINAL efiled and served via electronic means this 12th day of May, 2023, upon:

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Maricopa County Superior Court
c/o Sarah Umphress
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EXHIBIT A

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Dr. George F. Jackson Ph.D.
Toxicologist

Erich J. Speckin
Forensic Document Analyst
Ink Dating Specialist

Roger J. Bolhouse MBA
Laboratory Director
Crime Scene Reconstruction
Forensic Analyst & Consultant

Thomas K. Huard Ph.D.
DNA Analyst & Consultant

Terry Nadeau
Arson Investigator

Richard L. Brunelle
Retired Ink Dating Consultant

Dr. Laurence R. Simson M.D.
Retired Forensic Pathologist

Anthony A. Milone
Computer & Graphics Specialist

Dr. Julie Howenstine
Serologist
DNA Analyst & Consultant
Crime Scene Reconstruction

Erich J. Speckin

Forensic Document Analyst
Ink Dating Specialist

Experience:

- Employed with Speckin Forensic Laboratories from 1993- Present
  President from 1999 – Present

Education:

-Purdue University at age 15 to study engineering
-Albion College at age 17 to study biology and pre-medical
-Michigan State University graduated with a degree in Chemistry (1995)

Forensic Training:

- Two-year residency with Leonard A. Speckin in the examination of questioned Documents (1993-1995)
- One-year residency with Brunelle Forensic Laboratories in the identification and dating of inks (1995-1996)

Publications:

Fourteen scientific papers and publications authored or co-authored including:

1. Obverse-Reverse Intersection of Lines, 1993 Midwestern Association of Forensic Scientists and 1996 American Society of Questioned Document Examiners

2. Chemical Removal of Magic Marker on Photocopied Documents, 1995 American Society of Questioned Document Examiners

3. A Private Examiner's Response to Ink Age Determination, 1996 American Academy of Forensic Sciences
4. Interpretation of Data Obtained in Relative Ink Age Determination Testing, 1997 American Academy of Forensic Sciences

5. How Do Forensic Chemists Detect 'Record Tampering'?, 1995 Michigan Lawyer's Weekly, 1995 Virginia Lawyer's Weekly

Erich J. Speckin

6. Technical Report with Case Studies on the Accelerated Aging of Writing Inks, 1998 International Journal of Forensic Document Examination, 1999 Canadian Society of Forensic Science, 1999 GFS Hamburg, Germany

7. The Detection of Mastic on Plastic, 1996 Midwestern Association of Forensic Scientists, 1996 Southwestern Association of Forensic Document Examiners

8. More Forensic Solutions to Help Attorneys in Litigation, 1995 Michigan Lawyer's Weekly

9. Chapter in Encyclopedia of Crime & Punishment, 2001 Textbook

10. Ink Dating Examinations, 2000 NADE journal

11. Impression by Traced Forgery, 2001 American Society of Questioned Document Examiners (co-author)

12. Response to Criticism of Technique Use in Relative Ink Age Determination, 1999 American Academy of Forensic Sciences

13. The Dating of Writing Inks through 2-Phenoxyethanol Using Gas Chromatography-Mass Spectrometry: Advantages, Interpretation, and Limitations 2010, AFDE (co-author)

14. Can We Agree on Terminology Beyond Handwriting?, 2019, MAFS (Co-Author)

Invited Speaker:
Invited Speaker on the subject of forensic including the following groups and venues:

- Michigan State University
- Florida International University
- American Trial Lawyers Association
- International Association of Questioned Document Examiners
- Medical Legal Consultants
- National Association of Document Examiners
- Canadian Society of Forensic Sciences
- American Academy of Forensic Sciences
- American Society of Questioned Document Examiners
- Midwestern Association of Forensic Scientists
- Southwestern Association of Forensic Document Examiners
- Medical Defense Attorneys Meetings
- Wayne County Nursing Consultants
- Various Insurance and Private Investigators Associations
- Nevada State Bar Association
- Gesellschaft fur Forensische Schriftuntersuchung E.V. (GFS) in Hamburg, Germany

Erich J. Speckin

Court Testified:
Testified in cases in Federal Court, Circuit Court, District Court, Union Arbitrations, licensing matters, depositions, House of Representatives, and the State Board of Canvassers in Alaska, Alabama, Arizona, California, Colorado, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Nevada, New Jersey, New Mexico, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Virginia, Washington D.C., Washington, West Virginia, and Wisconsin. Also, in Vancouver, British Columbia Canada; Eulex Court in EU; India, Germany, Netherlands, Monterrey, Mexico, London, England; Tokyo, Japan, Jamaica, and Hong Kong.

I have been appointed by judges in approximately thirty states, including Michigan, California, Kentucky, Maine, Florida and Australia to perform examinations at the request of the court.

I have also been retained by the Drug Enforcement Agency, various U.S. Attorney's Offices, Embassy of Uruguay, Florida Department of Law Enforcement, many county Prosecutors from Los Angeles to Michigan, Michigan Attorney General's Office, Department of Natural Resources, The State Board of Canvassers, Health Care Fraud Division, Federal Defenders Offices, National Labor Relations Board as well as many local, county, state, and federal offices.

My clients include General Motors, Ford Motor Company, Chrysler, Honda, many national banks, National Collegiate Athletic Association, National Basketball Association, National Hockey League Players Association, as well as many others.

I have performed examinations in over three thousand cases and presented sworn testimony in thirty-seven states and eleven other countries on several levels approximately four hundred times in total. I have worked cases from five continents and many countries. (separate list available upon request)

National Media Appearances:
- National Media Appearances including:
- Wall Street Journal (front page)
- America's Most Wanted
- The Learning Channel (Medical Detectives)
- Good Morning America
- Consulting and prop creation for CSI episodes on ink dating
- Forensic Files

Professional Affiliations:
- Society of Forensic Ink Analysts (Board of Directors & President) 1998-2008
- Midwestern Association of Forensic Sciences
- American Society of Testing and Materials

EXHIBIT B

Erich Speckin has been involved in election matters for nearly 30 years. During this time, he has performed professional election work and has testified or been retained as an expert witness in over 400 legal proceedings or trials.

Mr. Speckin was initially trained by his father, Leonard Speckin, who was the chief document examiner in the Michigan State Police. In his official capacity, Mr. Leonard Speckin has also handled election related matters for the State of Michigan. This continued into his private practice.

The opinions given are based on Mr. Erich Speckin's education, knowledge, training, and experience. During his career, Mr. Speckin has engaged in many large-scale signature comparisons in cases involving long distance slamming, election matters involving ballots, recall elections, nominating petitions, and mass tort cases. in order to maintain his credentials, Mr. Speckin receives annual proficiency training in the examination of handwriting and signatures.

Mr. Speckin has discussed with or reviewed the sworn Declarations of the three Level 1 whistleblowers, Yvonne Nystrom, Jacqueline Onigkeit, and Andrew Myers (who largely performed curing), submitted as evidence in this matter. He also interviewed persons that have undergone Maricopa County signature verification training and has considered the following materials in forming his opinion:

- Former attorney General Mark Brnovich's report to Honorable Karen Fann dated April 6, 2022;

- Certain Information, data and log produced by Maricopa County pursuant to PRR #1482 concerning computer generated time allocations in the signature review process;

- A PowerPoint presentation by Shelby Busch of the organization We the People AZ Alliance presented at the Arizona Senate on January 23, 2023; and

- The Maricopa County signature verification training manual.

To become proficient in handwriting examinations in his field, there are typically 4000 hours of training and experience for an expert. In his experience, such as those signature reviewers employed by Maricopa County have far less experience but are being used for a limited purpose.

Mr. Speckin will opine that, excepting instances where there is an individual mark (X, line, or simple feature); the comparison of a signature to set of known signatures (up to 3 known signatures in level 1 and up to 6 signatures in level 2) should not take less than 30 seconds. Mr. Speckin will opine that this time can increase with factors detailed below as

well as the simple point a Level 2 reviewer would generally have a more difficult time making an association on signatures that had already been rejected on a Level 1 review.

Mr. Speckin will opine that the factors that may need to be accessed before a comparison could include made are range of variation in the known signatures, type of known signatures supplied (such as digital pad at the DMV), the dates or age of the comparison signatures in relation to the date of exam and the relative age of the purported signer.

Mr. Speckin will testify that a comparison is then made of the formative habits in the signature such as capital letters, slant, shape of letters, and proportions within the signature.

Mr. Speckin will also discuss studies in controlled situations comparing an expert to a lay person in signature cases, the accuracy with increased known signatures, and the time associated with increased review.

Mr. Speckin will opine that, based on 1.3 million early ballots envelopes reviewed in the 2022 General Election to be signature compared and on the number of signatures rejected at the Level 1 analysis at 25% (the low end of the range testified to by Level 1 signature reviewers Nystrom and Onigkeit) and the number of Level 2 reviewers, a reliable and reasonable review of the 300,000+ signatures at level 2 could not have been made by me or similarly trained expert. Mr. Speckin will opine that signature verification was either not performed at all, or was simply clicking through images without conducting a signature comparison. Mr. Speckin will opine that an example of this would be in Former AG Brnovich's report to Senator Fann discussed above. In that letter AG Brnovich noted an instance that the Maricopa Recorder verified 206,648 early ballot affidavit signatures with an average of 4.6 seconds per signature. Mr. Speckin will opine that is not a signature review under any standard.

The basis for the facts relied upon by Mr. Speckin comes from the whistleblower witness interviews, affidavits, supplemental affidavits, data produced by the county, and the rate of rejection of signatures that would have been filtered to Level 2 review. The manner in which Level 1 and Level 2 reviewers are provided comparisons and allowed to review signatures.

Mr. Speckin will opine that in his expert experience, to perform the signature analysis, based on the mathematical inputs with a ratio of Level 1 to Level 2 reviewers (25 to 3); the hours and days worked (26 days maximum and 2 shifts totaling 12 hours of actual signature review) as described in the Declarations of Yvonne Nystrom, Jacqueline Onigkeit, and Andrew Myers, and an average time of 30 seconds or more for each review of rejected signature at the Level 2 review equals a maximum of 112,320 reviews. Mr. Speckin will opine that means in his expert opinion that 300,000 rejected – 112,320

maximum reviews would equal at least 187,680 signatures could not have gone through the Level 2 signature verification process.

He may also testify based on the testimony of lay and other witnesses.