

1 Bryan James Blehm (023891)
2 **BLEHM LAW PLLC**
3 10869 N. Scottsdale Rd., 103-256
4 Phone: 602-753-6213
5 bryan@blehmlegal.com

6 **OLSEN LAW, P.C.**
7 Kurt Olsen, D.C. Bar No. 445279*
8 1250 Connecticut Ave., NW, Suite 700
9 Washington, DC 20036
10 (202) 408-7025
11 ko@olsenlawpc.com
12 *to be admitted pro hac vice

13 *Attorneys for Contestant-Plaintiff*

14 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
15 **IN AND FOR THE COUNTY OF MARICOPA**

16 Kari Lake,
17 Contestant/Plaintiff,

18 **Case No. CV2022-095403**
19 **(Honorable Peter Thompson)**

20 v.

21 Katie Hobbs, personally as Contestee and
22 in her official capacity as Secretary of
23 State; Stephen Richer in his official
24 capacity as Maricopa County Recorder;
25 Bill Gates, Clint Hickman, Jack Sellers,
26 Thomas Galvin, and Steve Gallardo, in
27 their official capacities as members of the
28 Maricopa County Board of Supervisors;
29 Scott Jarrett, in his official capacity as
30 Maricopa County Director of Elections;
31 and the Maricopa County Board of
32 Supervisors,

33 **VERIFIED PETITION TO INSPECT**
34 **BALLOTS PURSUANT TO**
35 **A.R.S. § 16-677**

36 Defendants/Contestees.

37 Pursuant to A.R.S. § 16-677, Plaintiff hereby petitions this Honorable Court to
38 allow an inspection of the ballots used in the 2022 general election held in Maricopa
39 County. Plaintiff cannot properly prepare for trial without such an inspection.

1 Specifically, Maricopa County used ballots printed either by Runbeck Election
2 Services (“Runbeck”) or ballots printed using ballot-on-demand (BOD) printers
3 deployed at vote centers. As pled in the Plaintiff’s Complaint in Special Action and
4 Verified Statement of Election Contest Pursuant to A.R.S. § 16-672 (the “Election
5 Contest”), on November 8, 2022 (“Election Day”), 132 out of the total 223 Maricopa
6 County vote centers (59.2%), experienced widespread tabulator rejections of ballots
7 printed by BOD printers. Election Contest at ¶ 68. These widespread breakdowns and
8 rejected ballots, and the causes of those events, are material issues in this case. Maricopa
9 County also attributed these failures to various issues with the BOD Printers thereby
10 further placing these failures at issue in this case.¹

11
12 In order to properly prepare this case for trial, Plaintiff respectfully requests to
13 inspect ballots printed by Runbeck, ballots printed by BOD printers, and spoiled BOD
14 printed ballots. Plaintiff also requests the Court order Maricopa County to maintain the
15 BOD ballots segregated by vote center as Plaintiff believes they are currently stored.
16 Plaintiff requests that her designated representative be allowed to: (i) randomly select 50
17 BOD printed ballots cast on Election Day from six vote centers chosen by Plaintiff’s
18 representative; and (ii) 50 early voting ballots from six separate batches chosen by
19 Plaintiff’s representative.

20 RESPECTFULLY SUBMITTED this 13th day of December 2022.

21
22
23 /s/Bryan James Blehm
24 Bryan James Blehm
25 Blehm Law PLLC
26 (602) 752-6213
27 bryan@blehmlegal.com
28 *Attorneys for Plaintiff-Contestant*

28 ¹ See Declaration of Clay Parikh, Plaintiff’s cyber expert (“Parikh Decl.”) attached as Ex.
13 to the Olsen Declaration attached at Tab A to the Election Contest at ¶¶ 16, 20.

1 ORIGINAL efiled and served via electronic
2 means this 13th day of December, 2022, upon:

3 Honorable Peter Thompson
4 Maricopa County Superior Court
5 c/o Sarah Umphress
6 sarah.umphress@jbazmc.maricopa.gov

7 Joseph La Rue
8 Joe Branco
9 Karen Hartman-Tellez
10 Maricopa County Attorney's Office
11 225 West Madison St.
12 Phoenix, AZ 85003
13 laruej@mcao.maricopa.gov
14 brancoj@mcao.maricopa.gov
15 hartmank@mcao.maricopa.gov
16 c-civilmailbox@mcao.maricopa.gov
17 Attorneys for Maricopa County Defendants

18 Daniel C. Barr
19 Alexis E. Danneman
20 Austin C. Yost
21 Samantha J. Burke (#036064)
22 PERKINS COIE LLP
23 DBarr@perkinscoie.com
24 ADanneman@perkinscoie.com
25 AYost@perkinscoie.com
26 SBurke@perkinscoie.com
27 DocketPHX@perkinscoie.com
28 Attorneys for Defendant/Contestee Katie Hobbs

18 D. Andrew Goana
19 Coppersmith Brockelman P/c
20 agaona@cblawyers.com
21 Attorneys for Defendant Arizona Secretary
22 of State Katie Hobbs

22 Sambo (Bo) Dul
23 State United Democracy Center
24 bo@stateuniteddemocracy.org
25 Attorneys for Defendant Arizona Secretary
26 of State Katie Hobbs
27
28

Verification

I, Kari Lake, depose and say:

I have read the foregoing Verified Petition to Inspect Ballots Pursuant to A.R.S. § 16-677 and know the contents thereof by personal knowledge. I know the allegations of the Verified Petition to Inspect Ballots to be true, except the matters therein on information and belief, which I believe to be true.

Signed under penalty of perjury on this 13th day of December 2022.

A handwritten signature in black ink that reads "Kari Lake". The signature is written in a cursive, flowing style.

Kari Lake

RETRIEVED FROM DEMOCRACYDOCKET.COM