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Christina Spurlock SupOrdClerk

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Representing: Self (without attorney)

FOR CLERK'S USE ONLY

SUPERIOR COURT OF ARIZONA

IN MOHAVE COUNTY

TED BOYD ET AL,

Plaintiff,

vs.

KRIS MAYES ET AL,

Defendant

Case No.: CV-2022-01468

MOTION TO INTERVENE (REVISED)

*(Assigned to the Honorable Lee F. Jantzen)*

INTRODUCTION

Elections Integrity is of the utmost importance, and Abe Hamadeh has every right to seek relief for his election concerns, as there are legitimate concerns. However, the process of seeking relief for real or perceived election integrity issues through the Court should also have integrity, yet that is not happening in this case. Plaintiff Ted Boyd is, in fact, not a Mohave County qualified elector, Plaintiff Jeanne Kentch is a Plaintiff in very bad faith, and Mohave County (while named as a "county defendant") is involved in this lawsuit as a "fake defendant," because they actually wanted to sue Maricopa County. Instead, the strategy deployed was for Jeanne Kentch to sue Mohave County to provide Abe Hamadeh the standing needed to file this contested election lawsuit in the "reddest County in Arizona" in hope of securing a conservative judge more sympathetic to the cause. Other than Abe Hamadeh's legitimate concerns, everything else about this elections integrity lawsuit filed in Mohave County has been in bad faith, with no integrity, and in violation of the Oaths of Office sworn by Mohave County elected officials.

MOTION TO INTERVENE (REVISED) RE: CV-2022-01468

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1 This lawsuit is supposed to be about elections integrity. The Court should not permit Plaintiffs to  
2 manipulate the process of contesting an election by adding “fake county defendants” for the purpose of cherry  
3 picking a perceived more sympathetic venue. No specific harm to either Mohave County Plaintiff has been  
4 identified in the complaint. And the only specifically identified harm to Abe Hamadeh is directed at Maricopa  
5 County entities.

6 The Court should order Plaintiff Ted Boyd to be removed from the lawsuit, as this name fails to  
7 appear on the roster of registered voters within Mohave County. **Exhibit A** (all legally public information) shows  
8 the names of the only registered voters at the address listed for Ted Boyd in the voter data base to which  
9 REACHANGE pays for access. On December 16, 2022, Real Change PAC verified this information with Natalie  
10 Collings, Voter Registration Supervisor with Mohave County Recorder’s Office. If one of the registered Boyd voters  
11 at this address uses “Ted” as a nickname, then the complaint should be amended to reflect the legal name of an  
12 actual qualified elector within Mohave County. (Natalie Collings also confirmed that there is no “Ted Boyd”  
13 registered to vote anywhere in Mohave County.)

14 The Court should order Jeanne Kentch to be removed as Plaintiff from this lawsuit, as she has not  
15 filed this action in good faith. In terms of this election contestation, Jeanne Kentch joined as a Plaintiff under the  
16 guise of suing Mohave County for non-specific “county defendant” complaints. However, **Exhibit B** shows that in  
17 the capacity as the Mohave County Republican Party Chair, Jeanne Kentch is on public record at the November 21,  
18 2022 Mohave County Board of Supervisors (BOS) meeting praising Allen Tempert’s job, and how impressed she  
19 was with Mohave County’ election, and how she witnessed first hand how “fair” and “honest” the Mohave County  
20 election was. Jeanne Kentch is a Plaintiff in very bad faith. Her real motivation as named Plaintiff is to provide  
21 standing for Abe Hamadeh’s case to be litigated in Mohave County where she perceives a more sympathetic venue.  
22 There is no integrity in Jeanne Kentch pretending to sue Mohave County for fake grievances that she does not  
23 actually have.

24 The Court should admonish Mohave County for their participation in this ruse to provide the  
25 standing Abe Hamadeh’s lawsuit needed to file in Mohave County. **Exhibit C** shows the publicly announced special  
26 BOS meeting scheduled for December 15, 2022, with the single agenda item of discussing Mohave County  
27 becoming a Plaintiff against Maricopa County. **Exhibit D** shows Dave Hawkins’ reporting on Mohave County’s  
28 discussion about potential litigation against Maricopa County, and Chairman Gould’s public admission that the out-

1 of-state attorney came to Mohave County “shopping for a plaintiff.” And they found one. The special meeting was  
2 canceled once Jeanne Kentch feigned harm by Mohave County and joined as a Plaintiff. [Exhibit E.]

3 Furthermore, based on “information and belief,” Mohave County has no intention of calling  
4 Jeanne Kentch out for her role as a “bad faith” Plaintiff, or defending against her malicious and fake accusation of  
5 supposed election harm. Mohave County wants Jeanne Kentch as a Plaintiff, because it provides Abe Hamadeh the  
6 standing required to file in Mohave County, and because it’s how Mohave County sues Maricopa County without  
7 violating the laws that limit their authority to conduct only the legal business of Mohave County elections. There is  
8 no integrity in Mohave County’s actions to manipulate the legal process as part of their personal and very partisan  
9 political grievances with Maricopa County.

10 In addition, given the facts in reference to all of the bad faith Mohave County actors, and if “Ted”  
11 turns out to be a nickname, the Court should remove “Ted Boyd” as a Plaintiff, as there has been no harm done to  
12 any Mohave County voter from the Mohave County election, and because he is just another Plaintiff added to the  
13 out-of-state attorney’s “shopping list” for Abe Hamadeh’s standing to file in Mohave County. Once the Mohave  
14 County Plaintiffs have been removed, and if the Court has not already dismissed this “bad faith” filed case, the  
15 Court should transfer the remainder of the litigation process to Maricopa County, where it rightfully belongs.

16 REAL CHANGE is a non-partisan Arizona Standing Political Action Committee (PAC) #100614,  
17 created specifically to fight for ten core non-partisan common-ground issues across Arizona’s 5<sup>th</sup>/30<sup>th</sup> Legislative  
18 District. REAL CHANGE PAC properly filed its organization with the Arizona Secretary of State in 2021 [Exhibit  
19 F], and has properly served notice of its Statement of Organization and intent to conduct activity with Mohave  
20 County, La Paz County, and Maricopa County. *Government Accountability and Elections Integrity* are two of the ten  
21 common ground issues that motivate the PAC’s work. REAL CHANGE was created intentionally as a non-partisan  
22 PAC to do the extremely difficult work of bridging the divisive partisan rhetoric by focusing on the issues that both  
23 sides have in common. REAL CHANGE PAC has been involved in non-partisan elections integrity work throughout  
24 the entire 2022 election cycle. And, REAL CHANGE PAC has been actively engaged in elections integrity  
25 accountability with Mohave County throughout the 2022 elections certification process (e.g., AZ AG open meeting  
26 law violation complaint re: Mohave County’s subversion of legal county business into partisan political protest with  
27 delay of elections certification, and AZ ACLU complaint re: Mohave County’s assault on Mohave County’s  
28 elections integrity.)

1                   Among those severely and irreparable harmed by the bad faith participation of Jeanne Kentch and  
2 Mohave County in this lawsuit are the more than 100,000 registered voters and constituents of Mohave County,  
3 including the Proposed Intervener, who have a right to have the integrity of Mohave County elections be represented  
4 honestly by Mohave County's elected officials who have sworn an Oath of Office as public servants. They also have  
5 a right for elected government officials to be held accountable when they are betraying their Oath of Office and  
6 betraying the trust of the voters who have elected them. Mohave County Supervisors and Mohave County Attorney  
7 Matthew Smith are all elected officials. And Jeanne Kentch may be an individual and the Chair of the Mohave  
8 County Republican Party, but she is also the elected Mohave County Assessor, which cannot be separated from her  
9 actions as a bad faith Plaintiff suing Mohave County.

10                   REAL CHANGE PAC (Proposed Intervener) meets the requirements for both "intervention as a  
11 right" and "permissive intervention" under Rule 24 of the Arizona Rules of Civil Procedure. There can be little  
12 doubt that Proposed Intervener has substantial and legally protectable interest in this matter. Proposed Intervener  
13 seeks to protect the rights of Mohave County voters and constituents, as well as protect Proposed Intervener's rights  
14 as a political action committee intrinsically involved in the issues addressed in this lawsuit. Should Jeanne Kentch  
15 be allowed to continue as a Plaintiff in bad faith, and Mohave County be allowed to participate as a "fake  
16 defendant," the integrity of Mohave County's election would be grossly and negligently maligned, the rights of  
17 Mohave County citizenry to have elected officials present honest information about Mohave County elections would  
18 be violated, and the Mohave County elected officials involved would be allowed to violate their Oaths of Office  
19 with impunity.

20                   Proposed Intervener's perspective differs markedly from that of the existing parties, such that the  
21 existing parties do not, cannot, or will not adequately represent the Proposed Intervener in this litigation. If Mohave  
22 County were a legitimate "county defendant," they would absolutely and indignantly defend Mohave County's  
23 election integrity by calling out Jeanne Kentch's public record statements singing the praises of Mohave County's  
24 "exemplary" election, and for joining this lawsuit as a "bad faith" Plaintiff. The Court should not permit these  
25 Mohave County elected officials to participate in this elections integrity litigation in such a manner that violates the  
26 rights of its citizens, violates their Oath of Office in service to personal and partisan political beliefs, betrays the  
27 public trust, and violates the ethics of engaging in litigation honestly and in good faith.

1 For each of these reasons, discussed further below, Proposed Intervener should be granted  
2 intervention as a right, or, in the alternate, permissive intervention.  
3  
4  
5

## 6 ARGUMENT

7 Under Rule 24, a party is entitled to intervene when, on a timely manner, a party “claims an  
8 interest relating to the subject of the action, and...disposing of the action in the person’s absence may as a practical  
9 matter I, pair or impede the person’s ability to protect that interest, unless existing parties adequately represent that  
10 interest.” Ariz. R. Civ. P. 25(a). Alternatively, intervention may be permitted where the motion is timely and a party  
11 “has a claim or defense that shares with the main action a common question of law or fact.” Ariz. R. Civ. P.  
12 24(b)(1). Rule 24 is a remedial rule that “should be construed liberally in order to assist parties seeking to obtain  
13 justice in protecting their rights. *Dowling v. Stapely*, 221 Ariz. 251, 270 ¶ 58 (App. 2009). Proposed Intervener  
14 satisfies both standards and its *Motion to Intervene* should be granted.

### 15 I. Proposed Intervener is entitled to Intervene as a right.

16 Proposed Intervener is entitled to Intervene as of right under Rule 24(a). The Court must allow  
17 intervention where four elements are satisfied: “(1) the motion must be timely; (2) the applicant must assert an  
18 interest relating to the property or transaction which is the subject of the action; (3) the applicant must show that  
19 disposition of the action may impair parties or impede its ability to protect its interest; and (4) the applicant must  
20 show that the other parties would not adequately represent its interest; and (4) the applicant must show that the other  
21 parties would not adequately represent its interests.” *Woodbridge Structured Funding, LLC v. Arizona Lottery*, 235,  
22 Ariz. 25, 28, ¶ 13 (App. 2014). Proposed Intervener meets each of these requirements.

#### 23 A. The *Motion to Intervene* is timely.

24 Proposed Intervener timely filed this Motion to Intervene. Plaintiffs filed this lawsuit on Friday,  
25 December 9, 2022. Proposed Intervener attended return hearing on Wednesday, December 14, 2022. Proposed  
26 Intervener's communication with Mohave County Attorney Ryan Esplin on Thursday, December 15, 2022 made  
27 clear that Mohave County was unlikely to call out Jenne Kentch as a bad faith Plaintiff. Proposed Intervener filed an  
28 initial *Motion to Intervene* on Friday, December 16, 2022. The initial *Motion to Intervene* was denied. The revised

1 *Motion to Intervene* was filed on the next business day, Monday, December 19, 2022. This lawsuit is an elections  
2 contest lawsuit, so an expedited process is in play. Proposed Intervener filed as expeditiously as possible once it was  
3 clear that it was unlikely that any other party could or would adequately represent Proposed Intervener's rights and  
4 interests.

5 Timeliness under Rule 24 is "flexible" and the most important consideration "is whether the delay  
6 in moving for intervention will prejudice the existing parties to the case. *Weaver v. Synthes, Ltd.* (U.S.A.), 162 Ariz.  
7 442, 446, (App. 1989). Here, granting the *Motion to Intervene* would not require altering any existing deadlines. In  
8 fact, the information and facts provided by Proposed Intervener are critical in determining the foundational  
9 legitimacy of the lawsuit to have been filed in Mohave County with a "bad faith" Plaintiff in the first place.

10 **B. The disposition of this case will impair Proposed Intervener's and Mohave County**  
11 **citizenry's ability to protect their interests.**

12 Proposed Intervener and Mohave County citizenry have important interests in having faith in  
13 Mohave County elections and faith that the elected officials are honestly representing Mohave County elections.  
14 Jeanne Kentch's inclusion as a Plaintiff in this litigation calls into question and undermines confidence in Mohave  
15 County's elections integrity, because her Plaintiff status declares that Mohave County's elections were fraught with  
16 problems that warrant a law suit against Mohave County. And, at the same time, calls into question the integrity of  
17 Mohave County elected officials who are all on public record as stating that Mohave County's elections were  
18 exemplary. And it is highly unlikely that Mohave County Counsel will properly defend against the fake allegation  
19 by Plaintiff Jeanne Kentch that Mohave County elections were faulty.

20 This case threatens the right of Proposed Intervener and Mohave County voters to have faith in  
21 Mohave County elections. This case also threatens the right of Proposed Intervener and Mohave County citizenry to  
22 have faith that their elected officials are upholding their Oath of Office, representing elections honestly, and  
23 representing only the legitimate legal business of Mohave County elections in a non-partisan manner. Furthermore,  
24 if this case is allowed to proceed with Jeanne Kentch as a Plaintiff in bad faith, Proposed Intervener would be forced  
25 to expend substantial additional resources to counteract the civic engagement apathy that will result from the  
26 perception that there is no accountability in Mohave County and that "Mohave County is where hope comes to die."

27 **C. Proposed Intervener is not adequately represented in this case.**  
28

1 The interests of Proposed Intervener are not adequately represented by the parties participating in  
2 this case. Proposed Intervener's interests in this case—faith and confidence in Mohave County elections, faith and  
3 confidence that Mohave County elected officials will represent information about elections honestly, faith and  
4 confidence that Mohave County elected officials will uphold their Oath of Office in a manner that represents the  
5 legitimate legal business of Mohave County elections in a non-partisan manner, faith and confidence that “bad faith”  
6 actors who manipulate the Arizona legal system for personal partisan gain are held accountable by the Court —are  
7 not shared by the Secretary of State, the State of Arizona, or any of the county officials named as Defendants.  
8 Because the State Defendant “must represent the interests of all people in [their jurisdiction],” they cannot give the  
9 Proposed Intervener's interests “the kind of primacy” that Proposed Intervener can and will. *Planned Parenthood*  
10 *Arizona, Inc v. Am. Ass'n of Pro-Life Obstetrics & Gynecologists*, 227, Ariz. 262, 279, 257, P.3d 1181, 198 (App.  
11 2011).

12 **II. In the alternative, Proposed Intervener should be granted permissive intervention.**

13 Even if the Court were to find that Proposed Intervener is not entitled to intervene as a right, they  
14 should be granted permissive intervention because they have “a claim or defense that shares with the main action a  
15 common question of law and fact.” Ariz. R. Civ. P. 24(b)(1). When this standard is met, Arizona courts may  
16 consider other factors to decide whether to grant permissive intervention, including: (1) “the nature and extent of the  
17 intervenors’ interest;” (2) “their standing to raise relevant legal issues;” (3) “the legal position they seek to advance,  
18 and its probable relation to the merits of the case;” (4) “whether the intervenors’ interests are adequately represented  
19 by other parties;” (5) “whether intervention will prolong or unduly delay the litigation; and, (6) “whether parties  
20 seeking intervention will significantly contribute to full development of the underlying factual issues in the suit and  
21 to the just and equitable adjudication of the legal questions presented.” *Bechel v. Rose*, 150 Ariz. 68, 72 (1986). Like  
22 Rule 24(a), Rule 24(b) should be liberally construed. *Id.* Here, each factor weighs in favor of permitting Proposed  
23 Intervener's permissive intervention.

24 First, Proposed Intervener's interests are: (1) faith and confidence in Mohave County elections for  
25 Mohave County voters; (2) faith and confidence for Mohave County citizenry that Mohave County elected officials  
26 will represent information about elections honestly; (3) faith and confidence for Mohave County citizenry that  
27 Mohave County elected officials will uphold their Oath of Office in a manner that represents the legitimate legal  
28 business of Mohave County elections in a non-partisan manner; and (4) faith and confidence for Mohave County

1 citizenry that “bad faith” actors who manipulate the Arizona legal system for personal partisan gain are held  
2 accountable by the Court. Proposed Intervener’s interests align with and amplify interests of other parties, and do  
3 not divert focus from the general interests of this case.

4           *Second*, Proposed Intervener is a non-partisan Arizona Standing Political Action Committee  
5 (PAC) #100614, created specifically to fight for ten core non-partisan common-ground issues across Arizona’s  
6 5<sup>th</sup>/30<sup>th</sup> Legislative District. Proposed Intervener properly filed its organization with the Arizona Secretary of State  
7 in 2021 [**Exhibit F**], and has properly served notice of its Statement of Organization and intent to conduct activity  
8 with Mohave County, La Paz County, and Maricopa County. *Government Accountability* and *Elections Integrity* are  
9 two of the ten common ground issues that motivate the Proposed Intervener’s work. Proposed Intervener was  
10 created intentionally as a non-partisan PAC to do the extremely difficult work of bridging the divisive partisan  
11 rhetoric by focusing on the issues that both sides have in common.

12           Proposed Intervener has been involved in non-partisan elections integrity work throughout the  
13 entire 2022 election cycle. And, Proposed Intervener has been actively engaged in elections integrity accountability  
14 with Mohave County throughout the 2022 elections certification process. On December 8, 2022, Proposed  
15 Intervener filed an open meeting law violation complaint with the Arizona Attorney General’s Office re: Mohave  
16 County’s subversion of legal county business into partisan political protest with delay of elections certification. On  
17 December 11, 2022, Proposed Intervener filed an update to the December 8<sup>th</sup> open meeting law violation complaint  
18 with the Arizona Attorney General’s Office. On December 11, 2022, Proposed Intervener filed a complaint with the  
19 ACLU of Arizona re: Mohave County’s assault on Mohave County’s elections integrity. Proposed Intervener has  
20 standing to raise relevant legal issues.

21           *Third*, Proposed Intervener’s legal position: (1) Ted Boyd is not a qualified elector within Mohave  
22 County and should be removed from the lawsuit; (2) Jeanne Kentch is a Plaintiff in bad faith and should be removed  
23 from the lawsuit; (3) Mohave County is a “fake defendant” and should be admonished by the Court; and, (4) by  
24 removing Mohave County “bad faith” parties from this lawsuit, the venue should be changed to Maricopa County  
25 where it should have been filed in the first place. Proposed Intervener’s legal position directly relates to the  
26 legitimacy of this lawsuit being filed in Mohave County, which absolutely relates to the merits of this case.

27           *Fourth*, the interests of Proposed Intervener are not adequately represented by the parties  
28 participating in this case. Proposed Intervener’s interests in this case are not shared by the Secretary of State, the



1 State of Arizona, or any of the county officials named as Defendants. Because the State Defendant “must represent  
2 the interests of all people in [their jurisdiction],” they cannot give the Proposed Intervener’s interests “the kind of  
3 primacy” that Proposed Intervener can and will. *Planned Parenthood Arizona, Inc v. Am. Ass’n of Pro-Life*  
4 *Obstetrics & Gynecologists*, 227, Ariz. 262, 279, 257, P.3d 1181, 198 (App. 2011).

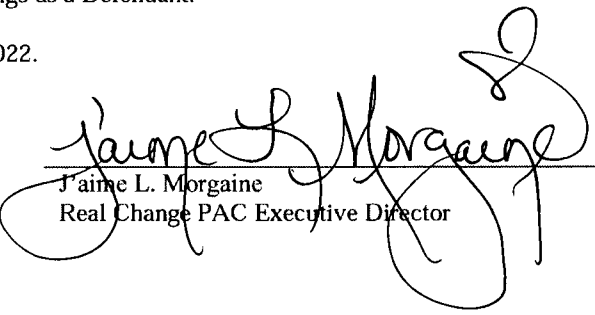
5 *Fifth*, Proposed Intervener has filed this *Motion to Intervene* in a timely manner, as expeditiously  
6 as possible once it was clear that it was unlikely that any other party could or would adequately represent Proposed  
7 Intervener’s rights and interests. Here, granting the *Motion to Intervene* would not require altering any existing  
8 deadlines.

9 *Sixth*, Proposed Intervener will significantly contribute to full development of the underlying  
10 factual issues in the suit and to the just and equitable adjudication of the legal questions presented.

#### 11 CONCLUSION

12 For these reasons, Real Change PAC humbly and respectfully requests that the Court grant the  
13 Motion to Intervene and participate in these proceedings as a Defendant.

14 Dated this 19<sup>th</sup> day of December, 2022.

15  
16   
17 Jaime L. Morgaine  
18 Real Change PAC Executive Director  
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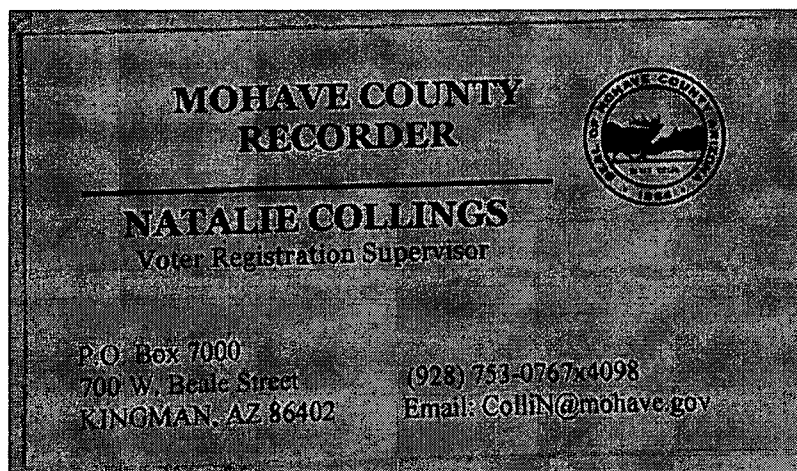
**EXHIBIT A**

(Source: Vote Builder)

|                     |                |                  |    |
|---------------------|----------------|------------------|----|
| Boyd, Edward Stuart | 1345 Angler Pl | Lake Havasu City | 61 |
|---------------------|----------------|------------------|----|

|                          |                |                  |    |
|--------------------------|----------------|------------------|----|
| Skelton Boyd, Janice Lee | 1345 Angler Pl | Lake Havasu City | 60 |
|--------------------------|----------------|------------------|----|

Confirmed by:



1 **EXHIBIT B**

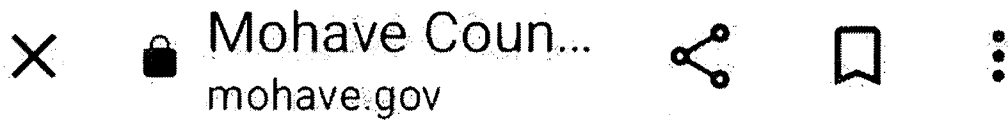
2 (Source: <https://www.mohave.gov/>)

3 9 minute clip of Jeanne Kentch's public record statement at the November 21, 2022 BOS Meeting  
4 [https://youtu.be/mP-ril\\_oyJo](https://youtu.be/mP-ril_oyJo)

5 Transcript of Jeanne Kentch's public record statement: "To canvass...yeah, to canvass is to  
6 validate our votes. Mohave County voters are fortunate to have Allen Tempert as our election director. He's  
7 probably the best in the business. Allen Tempert did an excellent job. And I witnessed it. I was there. I was on the  
8 hand count. I was just impressed, all the way. Fair. Honest. And Mohave County is a great example, throughout the  
9 entire state, of how it should be done. This is why I would like to see you certify the election. But I'd like to see you  
10 certify the election vote so we don't risk the statutory recount that could help our Republican Attorney General  
11 candidate Abe Hamadeh, because you need to have all 15 counties certify in order to recount. So, that's the concern  
12 we have. But, if Maricopa County doesn't certify—which doesn't look that way—then we're going to be without a  
13 recount anyway. So, but I also understand that Mohave County voters have been disenfranchised. Mohave County  
14 voters have...their votes have been diluted. Mohave County has become...their votes have been worth less than they  
15 were prior to this vote, due to the mismanagement and the dysfunction of the Maricopa County Elections  
16 Department. Maricopa County's vote suppression is evidenced by voters that could not vote (my sister being one of  
17 them), by ballots that were not counted properly, by tabulation machine malfunctions in 48% of their voting centers,  
18 by the stalling of their counts, and by the investigation that has been started by the Arizona Attorney General just  
19 this last Friday, because of their mismanagement. I wish they had Allen, I really do. And I'm glad I don't have the  
20 decision like you guys do. Because to certify this vote could put our recount in jeopardy, but to not certify the  
21 vote...I mean to not certify the vote could put the our recount in jeopardy, but to certify the vote tells everybody  
22 around the state how great we are, and how they should do their job. So, good luck on that decision. Any  
23 questions?"

EXHIBIT C

(Source: <https://www.mohave.gov/>)





# MOHAVE COUNTY ARIZONA



## Meeting Portal

### Upcoming Events

| Session                              | Date         | Time    |        |
|--------------------------------------|--------------|---------|--------|
| Board of Supervisors Special Meeting | Dec 15, 2022 | 9:30 AM | Agenda |

EXHIBIT D

(Source: <http://thestandardnewspaper.online/2022/12/07/gould-pushing-for-lawsuit-against-maricopa-county%ef%bf%bc/>)



**MOHAVE COUNTY** – Mohave County and the State of Arizona have certified the November 8 general election results, but that doesn't mean the party's over. The Board of Supervisors will consider potential litigation nine days before Christmas.

Chairman Ron Gould has scheduled a December 16 special Board of Supervisors meeting to consider bringing a lawsuit against Maricopa County, the Arizona Secretary of State's Office, or both. Gould said Mohave County voters have been harmed by mistakes that occurred during the election in the state's largest county.

"We're considering filing a lawsuit against Maricopa County for their poor handling of their election that's disenfranchised the voters of Mohave County," Gould said. "They make up such a large percentage of the population that their mistakes are bigger than the amount of votes that Mohave County turns out... and the problem is they've had three elections now that they've had serious problems."

Gould said contemplated litigation would aim for a Court order directing Maricopa County to conduct its entire election once again, from scratch. He said it's his understanding that litigation pitting one Arizona county against another goes directly to the State Supreme Court.

"We're trying to get a new election in Maricopa County that's run by somebody other than Maricopa County," Gould said, thinking close statewide republican races might enjoy more favorable outcomes for the GOP due to vote suppression. "I think the republicans were disenfranchised in Maricopa County. The problems they had election day disenfranchised republican voters more than democrat voters."

Gould conceded the litigation is not his idea. He said out of state attorney Kurt Olsen reached out to him indicating he was "shopping for a plaintiff" and that other Arizona counties might follow the lead of Mohave if the Board of Supervisors decided to go to court, utilizing his legal services at no cost to local taxpayers.

Olsen is the same Washington, D.C. lawyer who unsuccessfully lobbied Mohave County to file a lawsuit seeking abolition of vote counting machines in favor of a hand count process for the general election. County Elections Director Allen Tempert, when asked, has been an advocate for electronic tabulation, attesting to greater reliability, accuracy and speed than hand counting.

That a small county might take the state's largest county to court could bring Mohave County more regional and national attention in the aftermath of recent media publicity regarding the Board of Supervisor's reluctance for certifying the November 8 election results.

Jim Heath, an Emmy award winning television reporter and political analyst from Lake Havasu City, a current Independent and former Mohave County Republican Party Chairman, said Board of Supervisors gamesmanship with the canvas was no public relations favor for Northwest Arizona.

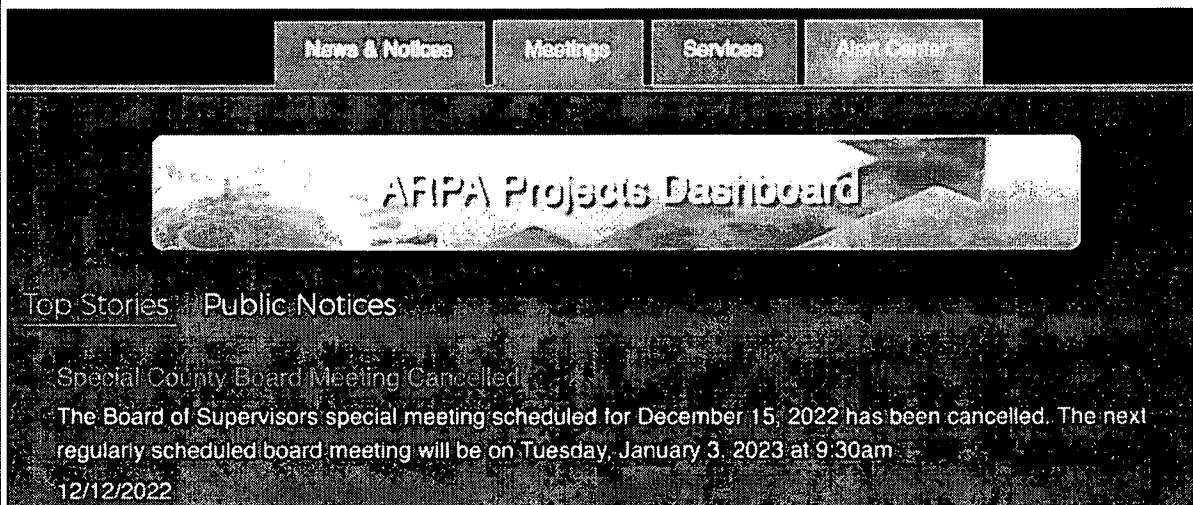
"I can tell you without any hesitation that Mohave County looks like a county that hates democracy. When you start messing around with people's votes, that makes you look nutty," Heath said. "That's how the nation sees it. The week of publicity for Mohave County was not positive."

Dave Hawkins



EXHIBIT E

(Source: <https://www.mohave.gov/>)



**MOHAVE  
COUNTY**



**PRESS RELEASE**

ROGER GALLOWAY, Communications Director  
(928) 757-0940 Ext 5940

***Mohave County Special Board Meeting Cancelled***

MOHAVE COUNTY, AZ (December 12, 2022) – The Board of Supervisors special meeting scheduled for December 15, 2022 has been cancelled.

The next regularly scheduled board meeting will be on Tuesday, January 3, 2023 at 9:30am.

Any future special board meetings will be announced accordingly in advance. None are scheduled at this time.

###

EXHIBIT F

**State of Arizona**  
**Department of State**  
**Campaign Finance Statement of**  
**Organization**



I, Katie Hobbs, Arizona Secretary of State, do hereby certify that on October 07, 2021, "**REAL CHANGE**" filed an amended Statement of Organization with the Arizona Secretary of State's Office. This committee has been assigned Identification Number **100614**. The Chairperson and Treasurer have read the Secretary of State's campaign finance filing guide, agreed to comply with Arizona campaign finance law, and agreed to accept all notifications and service of process via email.

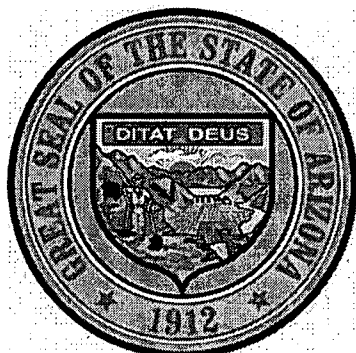
**Committee** **REAL CHANGE**  
PO BOX 8152  
HUALAPAI, AZ 86412  
Type: POLITICAL ACTION COMMITTEE (STANDING)  
Organization Date: 06/09/2021  
Bank: WELLS FARGO  
Contact: (928) 515-4333 morgaine4ld5@yahoo.com

**Chairperson** **J'AME L MORGAINE**

Employer/Occupation: N/A/retired  
Contact: (928) 515-4333 morgaine4ld5@yahoo.com

**Treasurer** **CAROL CAMPBELL**

Employer/Occupation: N/A/retired  
Contact: (928) 522-3348 cedj1@yahoo.com



IN WITNESS WHEREOF, I have hereunto set  
my hand and affixed the Great Seal of the  
State of Arizona. Done at the Capitol in  
Phoenix on this day, October 07, 2021.

A handwritten signature of Katie Hobbs in black ink.

Katie Hobbs  
Secretary of State

Date/Time of Certificate: 10/7/2021 11:50:15AM Verification URL: [www.azsos.gov](http://www.azsos.gov)

1 **CERTIFICATION of SERVICE**

2 ORIGINAL: filed this 19th day of December, 2022 with,  
3 Clerk of the Court, Mohave County Superior Court

4 COPY: hand-delivered/faxed/mailed/e-mailed this same date:

5 Hon. Lee Jantzen  
6 Via PDF: Division4@MohaveCourts.com

7 David A Warrington  
8 Via PDF: DWarrington@dhillonlaw.com

9 Gary Lawkowski  
10 Via PDF: GLawkowski@dhillonlaw.com

11 Timothy A La Sota  
12 Via PDF: tim@timlasota.com

13 Jeanne Kentch  
14 Via PDF: admin@wb-law.com

15 Ted Boyd  
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17 Abraham Hamadeh  
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23 sburke@perkinscoie.com

24 Secretary of State Katie Hobbs  
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26 Larry Noble, Apache County Recorder  
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28 Apache County Board of Supervisors  
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