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10 ARIZONA SUPERIOR COURT  
11 MOHAVE COUNTY

12 TED BOYD, et al.,  
13 Plaintiffs/Contestants,  
14 v.  
15 KRIS MAYES,  
16 Defendant/Contestee,  
17 and  
18 KATIE HOBBS, et al.,  
19 Defendants.

No. S8015CV202201468

**MOTION FOR ATTORNEYS' FEES**

(Assigned to the Hon. Lee F. Jantzen)

1 **Introduction**

2 Based on nothing more than speculation and conjecture, Plaintiffs Abraham Hamadeh,  
3 Jeanne Kentch, Ted Boyd, and the Republican National Committee (“Plaintiffs”)—through their  
4 counsel Timothy La Sota, Dennis I. Wilenchik, and John D. “Jack” Wilenchik, along with David  
5 A. Warrington and Gary Lawkowski (who never actually moved to be admitted pro hac vice)—  
6 attempted to overturn the results of Arizona’s November 2022 General Election. Plaintiffs and  
7 their counsel filed a complaint in search of facts and engaged in an unwarranted and unsuccessful  
8 fishing expedition to find any evidentiary support for their unfounded assertions.

9 Although each of their claims failed as a matter of law—as Mr. La Sota conceded several  
10 times during trial—Plaintiffs and their counsel continued to prosecute this case without  
11 justification and even after they were offered an opportunity to voluntarily dismiss all (or even  
12 some) of their claims, at the beginning of trial—by which time they undisputedly knew they had  
13 zero evidence to support most of their claims.

14 Merely losing an election, regardless of how close the margin is, provides no basis to  
15 pursue an election contest. It does, however, undermine voter confidence in Arizona’s electoral  
16 process and impugn hardworking election workers and officials who perform a difficult and  
17 often thankless job. For the sake of our democracy and the integrity of our elections, such  
18 egregious conduct cannot be permitted to continue without consequence.

19 Accordingly, pursuant to A.R.S. § 12-349, Defendant/Contestee Kris Mayes respectfully  
20 moves this Court to sanction Plaintiffs and their counsel for continuing to prosecute a groundless  
21 lawsuit, by holding them jointly and severally liable for the attorneys’ fees and costs that they  
22 forced Ms. Mayes to incur to defend this action and by imposing upon Plaintiffs and their counsel  
23 a discretionary penalty of double damages of \$5,000, as permitted by statute.  
24

1 **Background**

2 **I. Plaintiffs initiated this verified lawsuit based mostly on “information and belief.”**

3 Plaintiffs initiated this lawsuit by filing a Verified Statement of Election Contest in the  
4 Mohave County Superior Court on December 9, 2022.<sup>1</sup> Plaintiffs raised, through thirty-nine  
5 allegations made on “information and belief,” five “counts”: (1) an erroneous vote count and  
6 election board misconduct through wrongful disqualification of ballots, (2) an erroneous vote  
7 count and election board misconduct through wrongful exclusion of provisional voters, (3) an  
8 erroneous vote count through inaccurate ballot duplications, (4) illegal votes and an erroneous  
9 vote count through improper ballot adjudications, and (5) illegal votes through unverified early  
10 ballots. [12/9/2022 Statement of Election Contest]

11 Plaintiffs also filed a Verified Petition to Inspect Ballots and asked this Court for  
12 permission to inspect all duplicated ballots, ballots with a recorded undervote for the Attorney  
13 General race, and electronically adjudicated ballots. [12/13/2022 Verified Petition to Inspect  
14 Ballots]

15 **II. In accepting the veracity of all allegations in Plaintiffs’ Complaint, this Court**  
16 **declined to dismiss the Complaint and allowed Plaintiffs to prove their case at trial.**

17 On December 13, Ms. Mayes moved to dismiss the case. [12/13/2022 Def. Kris Mayes’  
18 Mot. to Dismiss & Pretrial Brief] This Court denied the Motion as to Counts I through IV but  
19 granted it as to Count V. [12/20/2022 Court Order/Notice/Ruling] The Court also found that “a  
20 limited inspection of ballots [wa]s appropriate” and directed the parties to “meet and confer and

21 \_\_\_\_\_  
22 <sup>1</sup> Plaintiffs previously filed a Verified Statement of Election Contest in Maricopa County  
23 Superior Court, but that contest was dismissed as premature. *See* 11/29/2022 Min. Entry,  
24 *Hamadeh v. Mayes*, No. 2022-015455 (Ariz. Super. Ct.). In dismissing that contest, the superior  
25 court explained that mandamus, as plaintiffs (including Mr. Hamadeh) had requested, was not  
26 an available form of relief in election contests. *Id.* at 2 (citing *Donaghey v. Attorney General*,  
120 Ariz. 93, 95 (1978) (holding that a mandamus action could not be brought when the  
“gravamen” of the complaint was that the election was improperly conducted)). This second  
Verified Election Contest, filed about two weeks later, was nearly identical to the first—and  
included, again, the improper request for a writ of mandamus. *See* Compl. ¶¶ 74, 82, 88, 95, 102.

1 choose the parties to do the inspection and the extent of the inspection by noon on Wednesday,  
2 December 21, 2022.” *Id.* at 4.

3 Immediately after the ruling on the Motion to Dismiss, on December 20, Ms. Mayes  
4 provided notice of her designated ballot inspector. [12/20/2022 Contestee Kris Mayes’ Notice  
5 Regarding the Inspectors of the Ballots] Maricopa County officials also reached out to Mr. La  
6 Sota and offered to allow an inspection of ballots beginning the following morning. Mr. La Sota,  
7 however, delayed in responding to Maricopa County and delayed in conferring with counsel for  
8 Ms. Mayes.

9 On Wednesday morning, two days before the Friday trial, counsel for Ms. Mayes reached  
10 out to Mr. La Sota to set deadlines to exchange witnesses and exhibits. Mr. La Sota said that he  
11 was unwilling to commit to any timelines at that time.

12 Then, on Wednesday afternoon, Plaintiffs filed a motion to receive (1) an unredacted copy  
13 of the sealed Cast Voter Record (“CVR”) and (2) a list of all provisional voters whose ballots  
14 were rejected. [12/21/2022 Resp. to Court’s Order Requiring Written Submissions Regarding  
15 Issues on Which No Agreement Has Been Made] Notably, Plaintiffs had not made either request  
16 in their original Petition to Inspect Ballots. [See Verified Petition to Inspect Ballots]

17 On Thursday morning, December 22, this Court denied Plaintiffs’ motion and ordered an  
18 inspection of ballots in Maricopa, Pima, and Navajo County. That same day, Plaintiffs’  
19 designated ballot inspectors reviewed thousands of ballots located in these three counties.

20 This Court then held the trial on Friday, December 23, 2022.<sup>2</sup>

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26 <sup>2</sup> See 12/23/2022 Evidentiary Hearing (“Hr’g”), available at [www.youtube.com/watch?v=Lc8rhYcLDpg](http://www.youtube.com/watch?v=Lc8rhYcLDpg).

1 **III. At trial, Plaintiffs did not present any evidence for three of their four claims and**  
2 **conceded in closing that their remaining claim failed as a matter of law.**

3 Plaintiffs' Complaint promised evidence for each of their claims, and because of the  
4 "unique" nature of an election contest, this Court gave Plaintiffs an opportunity to survive the  
5 Motion to Dismiss and present such evidence at trial. But Plaintiffs did not live up to their  
6 promise.

7 At trial, Plaintiffs offered evidence related only to their Count IV claim of an erroneous  
8 vote count through improper ballot adjudications. In total, the evidence offered by Plaintiffs in  
9 support of this claim was (1) the brief testimony of their chosen ballot inspector for Maricopa  
10 County and (2) *six* ballots that their inspector claimed should have been cast for Mr. Hamadeh.<sup>3</sup>

11 Plaintiffs introduced no evidence at the hearing in support of any other claim.

12 In total, Plaintiffs' case-in-chief lasted *under* twenty minutes.<sup>4</sup> See Hr'g at 49:38–1:05:33.  
13 And multiple times during his closing, Mr. La Sota conceded that his claims failed as a matter  
14 of law. See, e.g., Hr'g at 3:03:44–3:03:49 (noting that whatever evidence Plaintiffs had "won't  
15 actually be enough to sustain this this particular contest").<sup>5</sup>

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19 <sup>3</sup> During cross examination by counsel for Ms. Mayes, Plaintiffs' witness conceded that  
20 the ballot inspection panel did not agree that each of these six ballots should have been counted  
21 for Mr. Hamadeh. See Hr'g at 1:04:20–1:04:28 (Q: "If somebody testified there was more than  
22 one [ballot in disagreement] would they be telling the truth?" A: "That there was more than one?  
23 Yes."). Ms. Mayes also introduced eight ballots into evidence from the Maricopa County  
24 inspection that, had they been referred to adjudication, should have been counted for Ms. Mayes.

25 <sup>4</sup> After Plaintiffs' case-in-chief, Maricopa County called Elections Director Scott Jarrett  
26 as a witness. Mr. Jarrett walked through each of the fourteen contested ballots and explained  
that, based on his knowledge, experience, and training, the ultimate result of the ballot inspection  
in Maricopa County was a net gain of three votes for Ms. Mayes. Hr'g at 1:36:16–1:36:33 ("I  
determined that there were three errors on those ballots that should have been adjudicated  
differently and those three errors all were in the favor of, um, the Candidate Mayes."); *id.* at  
2:13:15–2:13:19 ("I believe that there would have been a net gain of three votes for Mayes.").

<sup>5</sup> Mr. La Sota also said: "We concede we do not have 511 votes." Hr'g at 2:37:03–2:37:07.

1 This trial confirmed that Plaintiffs did not have, and never did have, *any* evidentiary basis  
2 to support *any* of the counts in the contest. They also could not find any such basis in their ballot  
3 inspection.

4 Yet at every turn, Plaintiffs and their counsel continued to prosecute this case despite  
5 knowing that their evidence did not support overturning the 2022 Election for Arizona Attorney  
6 General.

7 They had multiple opportunities to abandon their groundless claims. Most plainly, when  
8 asked by counsel for Ms. Mayes at the beginning of trial whether Plaintiffs were continuing to  
9 assert Counts I through III, which had nothing to do with (allegedly) improperly adjudicated  
10 ballots, Mr. La Sota responded: “We’re not abandoning those counts, we are, I would say that  
11 we do not have further evidence to offer . . . That’s a mischaracterization to say that we’re  
12 abandoning any counts.” Hr’g at 19:20–19:42.<sup>6</sup>

13 Following closing arguments from each party, this Court ruled from the bench that  
14 Plaintiffs failed to meet their burden of proof for each of their claims, and it denied Plaintiffs’  
15 petition to change the results of the election or have additional votes counted for Mr. Hamadeh.  
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20 <sup>6</sup> Mr. La Sota also admitted specifically during closing that Plaintiffs had no basis to bring  
21 Count I to trial. *See* Hr’g at 2:57:39–2:58:02 (“Now that is something that we learned from Ms.  
22 Craiger and, and that was something that we had to run to ground and we basically we didn’t  
23 find anything that would contradict that so that is something that it turns out they actually went  
24 and they found those voters and that seemed to be at least not inconsistent with what we were  
25 able to glean so I stopped talking about it.”). This also was not new information to Plaintiffs or  
26 their counsel. At the hearing on the Motion to Dismiss earlier that week, Mr. La Sota stated: “I  
would like to note that Ms. Craiger provided some useful information, we have, uh, in terms of  
that the County did in fact count the people that were entitled to vote but sort of would have been  
disenfranchised because they checked in somewhere and didn’t check out.” [12/20/2022 Motion  
to Dismiss Hearing at 34:25–34:41, available at  
<https://www.youtube.com/watch?v=BLCqOQorVic>]

1 **Argument**

2 **I. This Court should sanction Plaintiffs and their counsel under A.R.S. § 12-349(A).**

3 **A. Plaintiffs brought their claims “without substantial justification.”**

4 For any civil action in Arizona, “the court *shall* assess reasonable attorney fees, expenses,  
5 and, at the court’s discretion, double damages of not to exceed five thousand dollars against an  
6 attorney or party . . . if the attorney or party,” among other actions, “[b]rings or defends a claim  
7 without substantial justification.” A.R.S. § 12-349(A)(1) (emphasis added). A claim lacks  
8 substantial justification if it is “groundless and is not made in good faith.” *Id.* § 12-349(F). “A  
9 claim is groundless ‘if the proponent can present no rational argument based upon the evidence  
10 or law in support of that claim.’” *Takieh v. O’Meara*, 252 Ariz. 51, 61 ¶ 37 (App. 2021) (quoting  
11 *Rogone v. Correia*, 236 Ariz. 43, 50 ¶ 22 (App. 2014)), *review denied* (Apr. 7, 2022).

12 In awarding fees, this Court should evaluate the factors set forth in A.R.S. § 12-350. Here,  
13 the statutory considerations support awarding Ms. Mayes her requested attorneys’ fees and costs.

14 **1. Plaintiffs’ claims were all “groundless.”**

15 **a. Counts 1–3**

16 First, as to Plaintiffs’ first (failure to “check out” voters), second (issues with provisional  
17 ballots), and third (ballot duplication) counts, Plaintiffs presented “no rational argument based  
18 upon the evidence or law in support of” those claims, *Rogone*, 236 Ariz. at 50 ¶ 22 (citation  
19 omitted), to support either a claim for misconduct, A.R.S. § 16-672(A)(1), or an “erroneous  
20 count” of votes, *id.* § 16-672(A)(5).

21 Again, Plaintiffs presented *no* evidence, whatsoever, about these counts at trial. Further,  
22 despite knowing that they planned to present no evidence related to these counts, Plaintiffs  
23 refused to dismiss them—including at the outset of the trial itself. Hr’g at 19:20–19:42; *see*  
24

1 A.R.S. § 12-350(3). Plaintiffs thus made no effort to “reduce the number of claims . . . found not  
2 to be valid.” A.R.S. § 12-350(2).

3 That Plaintiffs had zero evidentiary support for these claims was information that was  
4 “availab[le]” to the Plaintiffs at the outset of the lawsuit. *Id.* § 12-350(3).

5 **b. Count 4**

6 Next, Plaintiffs’ fourth count was similarly groundless. This Count was based on  
7 improper “ballot adjudications.”

8 For one thing, Plaintiffs’ claims for illegal votes, *id.* § 16-672(A)(4), was groundless.  
9 Plaintiffs even admitted at the trial that they should not have included this claim, saying that it  
10 was not properly drafted and “wasn’t part of the body of the complaint.” Hr’g at 2:58:51–2:59:15  
11 (Mr. La Sota stating, “[Regarding] an illegal vote, it didn’t really allege an illegal vote. It was  
12 really erroneous adjudication and perhaps that was a drafting matter that, um, that it could have  
13 been drafted a little bit better, uh, in retrospect, but I mean that that’s just, that’s just the way it  
14 goes in these types of situations and that was only a heading anyway. That wasn’t part of the  
15 body of the complaint.”). *But see, e.g.,* Compl. ¶¶ 4, 92, 100 (alleging “illegal votes”).

16 Plaintiffs’ claim for an “erroneous count of votes,” *id.* § 16-672(A)(5), was similarly  
17 groundless. Again, there was no “rational argument based upon the evidence or law in support  
18 of” this claim. *Rogone*, 236 Ariz. at 50 ¶ 22 (citation omitted). Plaintiffs had no evidence of this  
19 and could not find any even when presented with the opportunity to inspect ballots. Indeed, Mr.  
20 La Sota conceded several times in his closing argument that their evidence would not “actually  
21 be enough to sustain this this particular contest.” Hr’g at 3:03:44–3:03:49.

22 In short, Plaintiffs lacked a “rational argument” for asserting that their evidence  
23 established either illegal votes or an erroneous count of votes significant enough to overturn the  
24 results of the election. *Rogone*, 236 Ariz. at 50 ¶ 22.  
26





1 [bdj3rtjNiQXlpgDbySw](#)] Most recently, he has claimed that he was somehow disadvantaged  
2 because he did not know the results of the recount (that he again lost) during the pendency of  
3 this case and prior to the presentation of results. [Abe Hamadeh (@AbrahamHamadeh), Twitter  
4 (Dec. 2, 2022, 8:35 AM,  
5 <https://twitter.com/AbrahamHamadeh/status/1609936386102284288?s=20&t=I3->

6 [bdj3rtjNiQXlpgDbySw](#)] But this information was not relevant to any of the issues in this lawsuit.  
7 In any event, the Secretary of State and other election officials were required by law and court  
8 order to keep such information confidential.

9 Furthermore, a reasonable person in the position of Plaintiffs and their counsel should  
10 have known that their claims depended on the existence of facts they did not possess.

11 Ultimately, because Plaintiffs and their counsel brought these claims to trial without any  
12 facts or evidence demonstrating that they were likely to prevail, much less the “substantial  
13 justification” required to avoid sanctions, this Court should award Ms. Mayes her attorneys’ fees  
14 and costs pursuant to A.R.S. § 12-349(A)(1).

15  
16 **B. There is no doubt that Plaintiffs “[u]nreasonably expand[ed]” and “delay[ed] the proceeding.”**

17 At a minimum, this Court should award Ms. Mayes the attorneys’ fees and costs she  
18 incurred for trial and the preparation the day before trial.

19 Again, significant evidence demonstrates that Plaintiffs and their counsel knew that their  
20 claims depended on facts not present in this case, and Ms. Mayes should be awarded her fees for  
21 this entire action.

22 But, at a minimum, Plaintiffs and their counsel “[u]nreasonably expand[ed] . . . the  
23 proceeding” by forcing the parties and this Court to proceed through a trial, even after Ms. Mayes  
24 asked Plaintiffs to voluntarily dismiss their claims before trial began. *Id.* § 12-349(A)(3). This  
26

1 decision was unreasonable when Plaintiffs’ case-in-chief lasted under twenty minutes and when  
2 Mr. La Sota conceded in his closing argument what he knew well before the trial began: that the  
3 evidence was not “enough to sustain this this particular contest.” Hr’g at 3:03:44–3:03:49; *see*  
4 *also Standage v. Jaburg & Wilk, P.C.*, 177 Ariz. 221, 229–30 (App. 1993) (attorney had an  
5 obligation “to review and reevaluate his client’s position as the facts of the case developed and—  
6 although he should have known at the outset that the claims were frivolous—if he did not know  
7 at the outset, as he became aware of information that should reasonably lead him to believe there  
8 was no factual or legal bases for his position, he was obligated to re-evaluate any earlier  
9 certification under Rule 11”).

10 Arizona law requires an award of attorneys’ fees and costs “if the attorney or  
11 party . . . [u]nreasonably expands or delays the proceeding.” A.R.S. § 12-349(A)(3). Here, in  
12 addition to bringing claims that lacked substantial justification, Plaintiffs and their counsel  
13 forced the Defendants and this Court to prepare for and conduct a trial even though they knew  
14 that there was no possibility of meeting their burden of proof. By failing to voluntarily dismiss  
15 each claim, and Counts I, II, and III in particular, when they were aware that they lacked evidence  
16 to support them, Plaintiffs and their counsel “unreasonably expand[ed]” and “delay[ed]” the  
17 proceeding. And, in doing so, Plaintiffs and their counsel forced countless public servants—  
18 including elections workers, court officials, and more—to work overtime the day before a major  
19 holiday, resulting in a significant waste of time and public resources.

20 Accordingly, because Plaintiffs and their counsel knew, at a minimum, prior to trial that  
21 they lacked any evidence to support their claims, they had an obligation to dismiss their case.  
22 They refused to do so, even when offered that opportunity. This Court therefore should sanction  
23 Plaintiffs and their counsel pursuant to A.R.S. § 12-349(A)(3) for “unreasonably expand[ing]”  
24 and “delay[ing]” the proceeding.  
26

1 **Conclusion**

2 This case should never have been brought. Plaintiffs and their counsel attempted to  
3 overturn the results of a free and fair election based on nothing more than speculative  
4 “information and belief.” But despite their unwarranted fishing expedition, they failed to find  
5 any support to establish their unfounded claims. And even after offered an opportunity to  
6 voluntarily dismiss their claims before trial, Plaintiffs refused—only to concede in closing that  
7 their claims failed as a matter of law. For the sake of democracy and our elections, those who  
8 abuse the judicial system by bringing claims lacking evidentiary support or legal justification  
9 must be held accountable for their actions.

10 Therefore, this Court should sanction Plaintiffs and their counsel, jointly and severally,  
11 and award Ms. Mayes her attorneys’ fees and costs, as well as double damages of \$5,000.  
12

13 Dated: January 3, 2023

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