

KRISTIN K. MAYES  
Attorney General  
Firm Bar No. 14000

NICHOLAS KLINGERMAN  
State Bar No. 028231  
Assistant Attorney General  
2005 N. Central Avenue  
Phoenix, Arizona 85004  
Telephone 602-542-3881  
crmfraud@azag.gov  
*Attorneys for Plaintiff*

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,

Plaintiff,

v.

**KELLI WARD (001),  
TYLER BOWYER (002),  
NANCY COTTLE (003),  
ANTHONY KERN (005),  
ROBERT MONTGOMERY (007),  
SAMUEL MOORHEAD (008),  
LORRAINE PELLEGRINO (009),  
GREGORY SAFSTEN (010),  
MICHAEL WARD (011),  
RUDOLPH GIULIANI (012),  
JOHN EASTMAN (013),  
CHRISTINA BOBB (016),**

Defendants.

Cause No. **CR2024006850-001**  
**CR2024006850-002**  
**CR2024006850-003**  
**CR2024006850-005**  
**CR2024006850-007**  
**CR2024006850-008**  
**CR2024006850-009**  
**CR2024006850-010**  
**CR2024006850-011**  
**CR2024006850-012**  
**CR2024006850-013**  
**CR2024006850-016**

**PLAINTIFF'S RULE 15.1  
INITIAL DISCLOSURE**

Hon. Daniel G. Martin

The State, pursuant to Arizona Rule of Criminal Procedure 15.1, makes available the following material and information. All of the materials subject to

disclosure, presently in the State's possession, are referenced in this document. Additional disclosure, if any, will be made available as received, in accordance with Rule 15.6. Any such disclosure may be used in the State's case-in-chief or as rebuttal evidence in this case.

1. *Witnesses, Rule 15.1(b(1))*

State witnesses include, but are not limited to the following persons:

**AGO Special Investigations Section**

1. SA Jeff Ignowski #475
2. SA William Knuth #460
3. SSA John Hillman #469
4. Chief James Cope #453
5. Analyst Brooke Brown

**Witnesses**

6. Bill Gates, Former Member–Maricopa County Board of Supervisors
7. Jack Sellers, Former Member–Maricopa County Board of Supervisors
8. Steve Chucri, Former Member–Maricopa County Board of Supervisors
9. Clint Hickman, Former Member–Maricopa County Board of Supervisors
10. Gregory Jacob, Former Counsel to Vice President Mike Pence
11. Russell Bowers, Former Speaker of the House–AZ House of Representatives
12. Justin Clark, Former Trump Presidential Campaign Official
13. Brian Seitchik, Former Trump Presidential Campaign Official
14. William Stepien, Former Trump Presidential Campaign Manager

15. Cassidy Hutchinson, Former Aide to Mark Meadows

16. Doug Ducey, Former Governor of Arizona

17. Jamie Fleet, Former Advisor to Former Speaker Nancy Pelosi

18. Vincent Leach, Former Arizona State Senator

19. Kenneth Chesebro, Former Attorney for Trump Presidential Campaign

If a witness becomes unavailable pursuant to Arizona Rule of Evidence 804(a), the State will attempt to introduce prior statements under Arizona Rules of Evidence 803(24) and 804(b)(5).

Interviews of any of the above referenced witnesses, or other witnesses identified through the State's disclosure, will be arranged and attended by the State. The State requests the defense notify the State, in writing, as to which witnesses will be interviewed, dates and times available for the interviews, and how long the interviews are expected to take.

2. *Defendants' Statements, Rule 15.1(b)(2)*

The State will use any such statements whether recorded, summarized, transcribed, referenced or alluded to in the disclosure materials.

3. *Law Enforcement Reports, Rule 15.1(b)(3)*

The State will use any such reports or supplements, as well as information and materials referenced therein.

4. *Experts, Rule 15.1(b)(4)*

Examination notes made by experts listed shall be provided after written request. Additional names and materials will be disclosed as they become known. The State may

use any such expert or materials.

Additionally, any law enforcement officer listed in the disclosure materials may be called as an expert witness with respect to an area within the officer's training and experience, including expert knowledge of any area pertinent to this case.

5. *Papers, Documents, Photographs and Tangible Objects, Rule 15.1(b)(5)*

All items in Rule 15.1(b)(5) are listed below with other disclosure. Upon request, the State will arrange and attend the inspection of materials referenced in the disclosure materials. The State requests the defense notify the State, in writing, as to which items they request to inspect, dates and times available for the inspection, and how long the inspection is expected to take.

6. *Prior Felony Convictions of Defendants, Rule 15.1(b)(6)*

The State will provide documentation of any prior felony convictions for these defendants, alleged in a prior convictions allegation, that the State intends to use as evidence at the trial or sentencing phase of the case. The State reserves the right to supplement this information should additional material become available to the State.

7. *Prior Acts, Rule 15.1(b)(7)*

The State's intent to use prior or other acts may change depending on disclosed defenses and on the material revealed during interviews of defense witnesses, and/or if new facts arise in the discovery process. If either of these scenarios should occur, the State will notify defense counsel and file a formal 404(b) Notice and Motion.

8. *Brady Material, Rule 15.1(b)(8)*

To the extent material covered by Rule 15.1(b)(7) exists, it is included within the State's disclosure. The State does not possess additional *Brady* impeachment material.

The State will disclose within thirty days prior to trial in Superior Court any prior felony convictions and/or misdemeanor convictions involving dishonesty, which are contained within ACJIS records available to the Arizona Attorney General's Office, of non-law enforcement witnesses disclosed by the State.

9. *Electronic Surveillance, Rule 15.1(b)(9)*

Defendants were not subject to electronic surveillance.

10. *Search Warrant, Rule 15.1(b)(10)*

Search warrants were executed in this case.

11. *Informant, Rule 15.1(b)(11)*

There is no informant involved in this case whose existence or identity the State is required to disclose pursuant to Rule 15.4(b)(2) of the Arizona Rules of Criminal Procedure.

12. *Disclosure Materials*

The following disclosure materials have been uploaded to the AG Fileshare server and are available for downloading:

**EXHIBITS:**

**BATES No.:**

**REPORTS**

SIS Supplement 1 (Steve Chucri)	000001-000007
SIS Supplement 2 (Wilinchik and Bartness ATT Subpoenas)	000008-000009
SIS Supplement 3 (Jack Sellers)	000010-000015
SIS Supplement 4 (Bill Gates)	000016-000021

SIS Supplement 5 (Clint Hickman)	000022-000027
SIS Supplement 6 (Safsten Email Subpoena)	000028-000030
SIS Supplement 7 (Safsten Cell Phone SW)	000031-000033
SIS Supplement 8 (Hoffman TMobile Results)	000034-000036
SIS Supplement 9 (Maricopa County Subpoena Production)	000037-000039
SIS Supplement 10 (SWs)	000040-000042
SIS Supplement 13 (Christine Ferreiria Subpoena)	000049-000051
SIS Supplement 14 (Aaron Green Subpoena)	000052-000054
SIS Supplement 15 (Josh Offenhartz Subpoena)	000055-000057
SIS Supplement 16 (Kelli and Michael Ward Subpoena)	000058-000059
SIS Supplement 17 (Wilinchik & Bartness ATT Subpoenas)	000060-000063
SIS Supplement 18 (Kelli Ward Subpoena)	000064-000066
SIS Supplement 19 (Kelly Townsend Subpoena)	000067-000069
SIS Supplement 20 (Jason Miller Subpoena)	000070-000072
SIS Supplement 21 (Lee Miller)	000073-000076
SIS Supplement 22 (Kelly Townsend)	000077-000081
SIS Supplement 26 (Rusty Bowers Interview 2)	000082-000085
SIS Supplement 27 (Greg Jacob)	000086-000088
SIS Supplement 28 (Judge Snow Documents)	000089-000092

## **ANTHONY KERN**

1-26-21 Kern tweet about refusal to hand over records about J6	002750
12-7-23 Kern tweet refuses to cooperate with AZ GOP	002751
12-17-20 Kern retweet about no president elect	002752
12-17-20 Kern tweet calling Ducey and Bowers to decertify	002753
12-17-20 Kern tweet calling on Ducey and Bowers	002754
12-23-20 Kern tweet about filing a amicus brief	002755
12-30-20 Kern tweet saying he will be in DC on J6	002756
12-31-20 Kern tweet calling for Pence to decertify	002757
A Kern Exhibits	002758-002792
Anthoney Kern Interview 12 15 2020	002793
Anthony Kern Speaks at Stop the Steal in DC on Jan 6 <sup>th</sup>	002794
AZ Republic front page abt Kern at US capitol on J6	002795
CNN Speaks to Anthony Kern 2023	002796
Dec 14 Joint Resolution to accept fake electors	002797
Epoch Times Kern 3 4 2021	002798
Hoffman email to Pence staffer	002799
Kern 2024 election ad for US Congress	002800
Kern epoch 2	002801
Kern Epoch times for 3 4 2024	002802
Kern FB	002803
Kern on CNN	002804
Kern pic at the J6 capitol steps	002805

Kern speech	002806
Kern won't answer 3 4 2024	002807
Kern would not answer reporters ask about DOJ	002808
Twitter person asking Kern if pic is him at J6	002809

**BILL GATES**

Bill Gates Interview 10-9-23	002810
------------------------------	--------

**BRIAN SEITCHIK**

Dec 11th Email from Josh Findlay to Chesebro etc.	002811-002812
2020-12-11 - 1850 - Chesebro sends Findlay and Roamn Draft AZ...	002813-002814
2020-12-12 - 1047 - Reg Pol Director Brian Seitchik forwards...	002815-002817
2020-12-12 - 1830 - Chesebro e-mail to AZ noting Guiliani says ...	002818-002863
2020-12-12 - 1942 - E-mail from Kelli Ward on AZ status	002864-002866
2020-12-12 - 1759 - AZ update from Thomas Lane	002867-002869
Snip from Ronna McDaniel's J6 Depo	002870

**CASSIDY HUTCHINSON**

Cassidy Hutchinson Int 1 3-26-24	002871
Cassidy Hutchinson Int 2 3-26-24	002872

**CHRISTINA BOBB**

Azmirror.com	002873
Christina Bobb NYT story	002874-002877
Christina Bobb to Mike Roman on 12-14 Plan (written 12-12-20)	002878-002879
Youtube.com	002880

**CLINT HICKMAN**

Clint Hickman Interview 10-9-26	002881
Clint Hickman WAPO Interview	002882
Giuliani VM to Hickman circa 11-30-20	002883

**GREG JACOB**

Greg Jacob depo	002884-003111
Greg Jacob Interview 2-23-24	003112
Greg-jacob-jan-5-memo	003113-003115
J6h-greg-jacob-testimony-61622	003116-003118

**GREG SAFSTEN**

2020-12-10 1219 KC WRITES GREG SAFSTEN OF AZ IN RES...	003119-003119
2020-12-10 1221 KC reports e-mail to Safsten bounced back	003120-003121
2020-12-10 1221 Safsten e-mail bounces back	003122-003124
2020-12-10 1234 E-MAIL FROM EPSHTYN TO CHESEBRO...	003125-003127

2020-12-10 1434 CHESEBRO E-MAIL TO AZ WITH DRAFT...	003128-03129
2020-12-10 1459 Chesebro copies Wilenchik on e-mail...	003131
Azmirror.com	003132
Blake Masters has hired two 'fake electors' as campaign staffers	003133-003137
Elector Exhibits (1 <sup>st</sup> 12pgs)	003138-003149
Greg Safsten	003150

### **JACK SELLERS**

Jack Sellers Interview 10-9-23	003151
Jack Sellers Text Messages Dec 24 into 2021	003152-003164

### **JACK WILENCHIK**

ATT Results for Jun 2023 to Jan 2024 Calls	
ATT Records Key	003165-003181
Declaration 3855883	003182
Original 20240206-173041306	003183
ReportAU 3855883 Cellphone	003184-003402
ReportAU 3855883	003403-003557
ReportCT 3855883 Subscriber Info	003558
ReportCT 3855883	003559-003560
ReportICDR 3855883 International Calls	003561
ReportICDR 3855883	003562
ReportLandline 3855883 Wireline	003563-003582
ReportLandline 3855883	003583-003597
Wilenchik Cellphone Log June 2023 to Jan 2024	003598-003816
Jack Wilenchik calls to Czech Republic	003917
Jack Wilenchik Wired line Phone Logs June 20 2023 to Jan 24 2...	003918-003937

### **JAKE HOFFMAN**

AZ Central Story Rep. Jack Hoffman asked Pence to not accept ...	003938-003941
Elector Exhibits (1 <sup>st</sup> 12pgs)	003942-003953
Hoffman dodges	003954
Hoffman email to Pence staffer	003955
Hoffman letter to Pence 1	003956
Hoffman letter to Pence 2	003957
Hoffman on twitter	003958
Hoffman Story	003959
Hoffman video for SGJ 3-4-2024	003960
MSNBC Alex Wagner story about Jake Hoffman Letter	003961
Stonewalldemsaz.org	003962
CNN.com	003963
Defendyourvotingrights.org	003964
USAtoday.com	003965

**JAMES TROUPIS**

3.1.24 Redacted Troupis Settlement\_Redacted 003966-003969  
Redacted Troupis Privilege Log 003970-004236  
Troupis 008910 – Troupis 010348 004237-005675

**JASON MILLER**

Jason Miller Interview 3-22-24 005676

**JENNA ELLIS**

Ellis Initial Bar complaint (May '22) 005677-005719  
Ellis 2<sup>nd</sup> Bar Complaint in Colorado (late-'23) 005720-005853  
Ellis New Bar Complaint (Jan 24) 005854-005870  
Jenna Ellis w Rudy Giuliani 005871

**JIM LAMON**

Jim Lamon 01 30 2022 Interview Contingency 005872  
Jim Lamon explains elector role in news story contingency 005873  
Jim Lamon Interview 3-26-24 005874  
Jim Lamon news story Jan 31 2022 Contingency 005875  
Lamon Exhibits 005876-005900  
Lamon's Lame Excuse 005901  
Roselawgroupreporter.com 005902  
Azcentral.com 005903

**JOHN EASTMAN**

Eastman asks to be on pardon list 005904  
Testimony at Cali Bar hearing 005905-006108

**JOSH FINDLAY**

Findlay J6 Depo 006109-006198  
Josh Findlay (12-10-20) email on electors 006199-006200

**JUDGE MICHAEL LUTTIG**

Luttig statement to J6 Committee 006201-006206

**JUSTIN CLARK**

2020-12-10 - 1727 - JUSTIN CLARK SAYS GO GET EM KEN 006207  
2020-12-10 - 1853 - KEY THREAD WITH MORGAN ON RAT... 006208-006217  
2020-12-11 - 1301 - Chesebro e-mail to Troupis with draft press ... 006218-006219  
Justin Clark Interview 3-26-24 006220  
Boris telling everyone press release on hold until mayor and DJT... 006220-006224

**KELLI WARD**

2-20CV02321_DocketEntry_12-02-2020_1	006225-006277
5-24 Ward v. Jackson	006278-006296
25-30 Legal Cover Email Chain	006297-006301
AA Ward Phone Log-Call Data	006302-006415
AA Ward Phone Log-Sheet1	006416-006417
AA Ward Phone Log-Sheet2	006418-006422
CNN Article	006423-006432
Gohmert & K Ward etc. vs Pence (Dec. '20)	006433-006460
K Ward 12 1 2020	006461
Kelli Ward & electors – GOP tweets	006462
Kelli Ward & fake electors pray	006463
Kelli Ward (States United) summary of J6 materials	006464-006486
Kelli Ward book Justified	006487-006581
Kelli Ward Communications with Electors	006582-006605
Kelli Ward Facebook 12 15 2020	006606
Kelli Ward J6 Depo	006607-006674
Kelli Ward texts with Supervisor Steve Chucri	006675-006691
Kelli Wards call log 2023 to 2024-Sheet1	006692-006742
Kelli Wards call log 2023 to 2024-Sheet2	006743-006802
Kelli Wards call log 2023 to 2024-Sheet3	006803
Kelli Wards call log 2023 to 2024-Sheet4	006804
KelliWard & electors—GOP tweet	006805
KW 2020-12-12 -1047 - REG POL DIRECTOR SEITCHIK FWS...	006806-006808
KW AZGOP State of the Race Update_12.28.2020	006809
KW AZGOP tweet 12.28.2020	006810
KW Calls with Meadows	006811
KW Docs	006812-006814
KW Oh Yes	006815
P5 Treasonous Email	006816
P31-36	006817-006821
Page 3-4 Wilenchik	006822-006823
So does doctor Kelli Ward	006824
Ward & Meadows Communication Timeline	006825-006829
Ward Facebook about losing lawsuit	006830

**KELLY TOWNSEND**

Kelly Townsend Call #1	006831
Kelly Townsend Call #2	006832
Kelly Townsend Phone Log 2023-2024	006833-007549

**KEN CHESEBRO**

Chesebro Discovery (provided by him)

2020-09-23 - Atlantic - The Election the Could Break America	007550-007583
2020-10-30 - Politico - Trump and Biden Temas Prep for Elec...	007584-007592
2020-11-04 - Rick Perry text	007593-007596
2020-11-05 - Donald Trump Jr text	007597-007601
2020-11-05 - Mark Levin tweet	007602
2020-11-06 - Biggs-Meadows texts	007603-007605
2020-11-12 - Newt Gingrich text	007606-007608
2020-11-17 - 0900 - setting up conference call	007609
2020-11-17 - 0905 - setting up conference call	007610
2020-11-17 - 2200 - draft of Chesebro memo on real deadline	007611-007615
2020-11-17 - 2320 - cover e-mail to Nov 17 draft memo	007616
2020-11-18 - CHESEBRO MEMO ON JAN 6 AS REAL D...	007617-007623
2020-11-23 - CHESEBRO E-MAIL ON STATE NOT HAV...	007624-007626
2020-11-25 - 1545 - E-MAIL FROM TROUPIS TO CLARK...	007627
2020-11-25 - 1607 - Clark response to Troupis thanking him	007628
2020-12-06 - 0115 - CHESEBRO MEMO ON USING ALT E...	007629-007634
2020-12-07 - 0115 - cover e-mail to Troupis with memo	007635
2020-12-07 - 1906 - followup to Troupis on circulating memo	007636-007637
2020-12-07 - 2052 - E-MAIL CHAIN STARTING WITH TRO...	007638-007644
2020-12-08 - 0115 - E-MAIL TO TROUPIS ON ELECTORS...	007645-007647
2020-12-08 - 0958 - e-mails with Troupis on TX case	007648-007651
2020-12-08 - 1227 - e-mail thread on Texas case	007652-007653
2020-12-08 - 1310 - FOLLOWUP WITH TROUPIS	007654-007657
2020-12-08 - 1843 - E-MAILS WITH TROUPIS ON CALL...	007658-007659
2020-12-08 - 1914 - E-MAILS WITH JACK WILENCIK	007660-007662
2020-12-08 - 2129 - E-MAIL TO TROUPIS ON NEED TO F...	007663
2020-12-09 - 0003 - e-mail to Bock	007664-007667
2020-12-09 - 1427 - Chesebro corr with WI GOP	007668-007669
2020-12-09 - 1427 - more e-mails with WI GOP	007670-007671
2020-12-09 - 2236 - Chesebro e-mail to Austin Browning	007672
Chesebro to states Dec 13, 2020	
Chesebro coordinates w AZ	007673-007674
Chesebro coordinates w GA	007675-007677
Chesebro coordinates w NM	007678
Chesebro coordinates w NV 1	007679-007680
Chesebro coordinates w NV 2	007681-007683
Chesebro coordinates w NV 3	007684-007686
Chesebro coordinates w PA	007687-007688
Chesebro coordinates w WI	007689-007691
March 8 Discovery – 282 curated PDFs	
2020-09-23 - Atlantic - The Election that Could Break America	007692-007725
2020-10-30 - Politico - Trump, Biden Teams Prep for Election...	007726-007734
2020-11-04 - Rick Perry text	007735-007738

2020-11-05 - Donald Trump Jr text	007739-007743
2020-11-05 - Mark Levin tweet	007744
2020-11-06 - Biggs-Meadows texts	007745-007747
2020-11-12 - Newt Gingrich text	007748-007750
2020-11-17 - 0900 - setting up conference call	007751
2020-11-17 - 0905 - setting up conference call	007752
2020-11-17 - 2200 - draft of Chesebro memo on real deadline	007753-007757
2020-11-17 - 2320 - cover e-mail to Nov 17 draft memo	007758
2020-11-18 - CHESEBRO MEMO ON JAN 6 AS REAL DE...	007759-007765
2020-11-23 - CHESEBRO E-MAIL ON STATE LEGISLAT...	007766-007768
2020-11-25 - 1545 - E-MAIL FROM TROUPIS TO CLARK...	007769
2020-11-25 - 1607 - Clark response to Troupis thanking him	007770
2020-12-06 - 0115 - CHESEBRO MEMO RE ALTERNATE...	007771-007776
2020-12-07 - 0115 - cover e-mail to Troupis with memo	007777
2020-12-07 - 1906 - followup to Troupis on circulating memo	007778-007779
2020-12-07 - 2052 - E-MAIL CHAIN STARTING WITH TR...	007780-007786
2020-12-08 - 0115 - E-MAIL TO TROUPIS ON ELECTORS...	007787-007789
2020-12-08 - 0958 - e-mails with Troupis on TX case	007790-007793
2020-12-08 - 1227 - e-mail thread on Texas case	007794-007795
2020-12-08 - 1310 - FOLLOWUP WITH TROUPIS	007796-007799
2020-12-08 - 1843 - E-MAILS WITH TROUPIS ON CALL...	007800-007801
2020-12-08 - 1914 - E-MAILS WITH WILENCIK	007802-007804
2020-12-08 - 2129 - E-MAIL TO TROUPIS TO FLIP STATES	007805
2020-12-09 - 0003 - e-mail to Bock that electors will vote Dec...	007806-007809
2020-12-09 - 1427 - Chesebro correspondence with Wisconsin...	007810-007811
2020-12-09 - 1427 - more e-mails with WI GOP	007812-007813
2020-12-09 - 2236 - Chesebro e-mail to Browning	007814
2020-12-09 - 2236 - e-mails on links to 2016 certificates	007815
2020-12-09 - 2240 - Chesebro cover e-mail for Dec 9	007816
2020-12-09 - 2240 - CHESEBRO LOGISTICS MEMO	007817-007822
2020-12-10 - 1007 - TROUPIS E-MAIL TO CHESEBRO	007823
2020-12-10 - 1040 - FIRST CONTACT WITH CLARK	007824-007825
2020-12-10 - 1101 - e-mail from Epshtyn	007826-007828
2020-12-10 - 1212 - Justin Clark explains what RPD means	007829-007831
2020-12-10 - 1219 - KC WRITES GREG SAFSTEN	007832-007833
2020-12-10 - 1221 - e-mail to Safsten bounced back	007834-007835
2020-12-10 - 1221 - Safsten e-mail bounces back	007836-007838
2020-12-10 - 1234 - E-MAIL FROM EPSHTYN TO CHESE...	007839-007841
2020-12-10 - 1311 - e-mails with Wilenchik	007842-007846
2020-12-10 - 1329 - CHESEBRO TO REVIEW DRAFT CERT	007847-007851
2020-12-10 - 1416 - CHESEBRO EDITS ON WI PAPERS	007852-007858
2020-12-10 - 1419 - CHESEBRO EMAIL TO CLARK	007859-007862
2020-12-10 - 1422 - Chesebro asks Nick Trainer for more info	007863

2020-12-10 - 1434 - CHESEBRO E-MAIL TO AZ	007864-007865
2020-12-10 - 1436 - Epshtyn assignment to coordinate with st...	007866-007868
2020-12-10 - 1458 - Chesebro answers Troupis questions	007869-007875
2020-12-10 - 1459 - copies Wilenchik on e-mail to Safsten	007876
2020-12-10 - 1503 - Chesebro additional e-mail to Troupis	007877-007880
2020-12-10 - 1530 - Chesebro e-mail to Trainor	007881-007882
2020-12-10 - 1655 - e-mail agreeing on pre-Dec 14 press release	007883-007884
2020-12-10 - 1700 - elector info from Nick Trainor	007885
2020-12-10 - 1701 - E-MAILS WI GOP WITH REVISED FO...	007886-007888
2020-12-10 - 1706 - Chesebro e-mail to Nick Trainor	007889
2020-12-10 - 1712 - Chesebro writes Trainor	007890
2020-12-10 - 1719 - Jason Miller asks about identifying people	007891
2020-12-10 - 1724 - KEN ANSWERS MILLER	007892-007893
2020-12-10 - 1727 - CLARK SAYS GO GET EM KEN	007894
2020-12-10 - 1731 - E-MAIL SUGG ADVANCE PRESS RE...	007895-007897
2020-12-10 - 1755 - INTRODUCTORY E-MAIL TO GA	007898-007899
2020-12-10 - 1759 - INTRODUCTORY E-MAIL TO MI	007900-007901
2020-12-10 - 1800 - EPSHTYN E-MAIL INTRODUCING...	007902-007904
2020-12-10 - 1810 - CHESEBRO E-MAIL TO GUILIANI	007905-007908
2020-12-10 - 1814 - CHESEBRO E-MAIL TO GUILIANI	007909-007910
2020-12-10 - 1827 - Chesebro e-mail to DeGraffenreid	007911-007912
2020-12-10 - 1851 - Chesebro e-mail to Tom King	007913-007915
2020-12-10 - 1853 - KEY THREAD WITH MORGAN	007916-007925
2020-12-10 - 1904 - e-mail to Tom King	007956
2020-12-10 - 1910 - DeGraffenreid e-mail	007957
2020-12-10 - 1944 - e-mail to Troupis	007929-007933
2020-12-10 - 1944 - e-mails campaign and Troupis	007934-007938
2020-12-10 - 1946 - email to Clark and Morgan	007939-007943
2020-12-10 - 2024 - Epshteyn with phone # so Guilani can call	007944-007949
2020-12-10 - 2051 - CHESEBRO E-MAIL TO MI	007950-007952
2020-12-10 - 2111 - GUILIANI IS INCLINED TO HAVE NV...	007953-007959
2020-12-10 - 2117 - Chesebro e-mails with Troupis	007960-007962
2020-12-10 - 2128 - Epshteyn thanks Chesebro for update on...	007963-007969
2020-12-10 - 2128 - Troupis requests Chesebro attend meeting	007970-007972
2020-12-10 - 2203 - Chesebro e-mail to Tom King	007973-007974
2020-12-10 - 2208 - CHESEBRO E-MAIL TO GUILIANI...	007975-007976
2020-12-10 - 2226 - CHESEBRO E-MAILS WITH SHERIDAN	007977-007980
2020-12-10 - 2237 - CHESEBRO E-MAIL TO AZ ELECTORS	007981-007982
2020-12-10 - 2244 - Epshteyn says NV should vote	007983-007989
2020-12-10 - 2318 - Chesebro e-mail 2 to DeGraffenreid	007990-007992
2020-12-10 - 2344 - Introductory e-mail to GA	007993-007995
2020-12-11 - 0102 - Chesebro followup e-mail to GA	007996-007998
2020-12-11 - 0120 - Chesebro e-mail 3 to DeGraffenreid	007999-008002

2020-12-11 - 0155 - CHESEBRO E-MAIL TO MORGAN	008003-008004
2020-12-11 - 0714 - e-mail from Guiliani fw info to Epshten...	008005-008006
2020-12-11 - 0913 - Clark tells Findlay that Chesebro running pt	008007-008011
2020-12-11 - 0942 - Chesebro e-mails with Clark re Findlay	008012-008017
2020-12-11 - 0944 - e-mail from Findlay to Chesebro	008018-008023
2020-12-11 - 0954 - CHESEBRO E-MAILS FINDLAY	008024-008030
2020-12-11 - 1003 - Chesebro e-mails with Tom King	008031-008033
2020-12-11 - 1007 - FINDLAY SENDS CHESEBRO DRAFT...	008034-008100
2020-12-11 - 1026 - e-mail from Chesebro re PA	008101-008108
2020-12-11 - 1027 - CLARK re NEED FOR GORUND TEAM	008109-008117
2020-12-11 - 1029 - Chesebro e-mail to Clark	008118-008126
2020-12-11 - 1031 - CLARK ASKS TO KEEP HIM POSTED	008127-008136
2020-12-11 - 1059 - Chesebro e-mail to Findlay	008137
2020-12-11 - 1202 - CHESEBRO RE DISCUSSION WITH...	008138
2020-12-11 - 1216 - E-MAIL FROM JACK WILENCHIK	008139-008141
2020-12-11 - 1223 - CHESEBRO E-MAIL TO WILENCHIK	008142-008144
2020-12-11 - 1231 - e-mail from Jack Wilenchik	008145-008148
2020-12-11 - 1301 - Chesebro e-mail to Troupis	008149
2020-12-11 - 1428 - Chesebro e-mail to Findlay	008150-008151
2020-12-11 - 1454 - Chesebro e-mail to Bernie Kerik	008152-008153
2020-12-11 - 1504 - Chesebro e-mail on options for WI	008154-008155
2020-12-11 - 1527 - Chesebro e-mail updating Findlay, Roman	008156
2020-12-11 - 1528 - CHESEBRO E-MAIL TO ROMAN	008157-008158
2020-12-11 - 1536 - e-mail from Ted Christian on PA	008159-008161
2020-12-11 - 1545 - Epshteyn thanks Wilenchik	008162-008165
2020-12-11 - 1625 - Chesebro updated packet PA	008166-008169
2020-12-11 - 1642 - Christian copies Black on PA materials	008170-008173
2020-12-11 - 1643 - Chesebro e-mail to Bill Bock	008174
2020-12-11 - 1720 - Roman copies James Fitzpatrick	008175-008178
2020-12-11 - 1729 - Chesebro e-mail to Findlay	008179
2020-12-11 - 1740 - Roman copies Robert Sinners	008180
2020-12-11 - 1743 - e-mail from Roman	008181
2020-12-11 - 1755 - CHESEBRO TO FINDLAY, ROMAN...	008182-008183
2020-12-11 - 1758 - email to Findlay and Roman	008184-008188
2020-12-11 - 1817 - email fixing mistake on GA docs	008189
2020-12-11 - 1839 - CHESEBRO SENDS BLACK INFO ON...	008190-008191
2020-12-11 - 1850 - EMAIL TO FINDLAY, ROMAN AZ D...	008192-008193
2020-12-11 - 1853 - email to Findlay, Roman on PA	008194-008199
2020-12-11 - 1954 - Chesebro e-mail to Roman re NV	008200-008202
2020-12-11 - 2013 - TROUPIS ABOUT PRESS RELEASE	008203
2020-12-11 - 2046 - Chesebro copies Brown on NV	008204-008206
2020-12-11 - 2051 - DONE DRAFTING	008207-008209
2020-12-11 - 2058 - E-MAILS WI FINAL DRAFT OF PACKET	008210

2020-12-11 - 2101 - DeGraffenreid deferrs to Binnall	008211-008214
2020-12-12 - 1047 - SEITCHIK FW DOCS FOR AZ ELECT...	008215-008217
2020-12-12 - 1119 - EPSHTEYN REQ MEMO ON VP JAN 6...	008218-008227
2020-12-12 - 1418 - Michael Brown update on AZ	008228-008231
2020-12-12 - 1600 roughly - TEXT FROM ROMAN	008232-008235
2020-12-12 - 1753 - AZ WHIP UPDATE WILENCHIK	008236-008237
2020-12-12 - 1759 - AZ update from Lane	008238-008240
2020-12-12 - 1830 - E-MAIL TO AZ RE GUILIANI	008241-008286
2020-12-12 - 1837 - e-mail to Findlay re Guiliani	008287
2020-12-12 - 1912 - E-MAIL TO ROMAN, FINDLAY	008288
2020-12-12 - 1916 - E-MAIL CHAIN WITH ROMAN	008289-008290
2020-12-12 - 1942 - E-mail from Kward on AZ	008291-008293
2020-12-12 - 1959 - AZ update from Lane	008294-008295
2020-12-12 - 2006 - e-mail answering Kward questions	008296-008299
2020-12-12 - 2007 - email chain on AZ whip operation	008300-008302
2020-12-12 - 2021 - EPSHTEYN REQ PACKET FOR NM	008303-008312
2020-12-12 - 2044 - Chesebro e-mail to Morgan	008313-008314
2020-12-12 - 2232 - FITZPATRICK ADOPTS CHESEBRO...	008315-008316
2020-12-13 - 0028 - E-MAIL TO ROMAN RE NM	008317
2020-12-13 - 1135 - e-mail to Kward on AZ logistics	008318-008322
2020-12-13 - 1138 - e-mail to Fitzpatrick of PA	008323
2020-12-13 - 1145 - e-mail to Wilenchik on AZ logistics	008324-008329
2020-12-13 - 1148 - e-mail to Fitzpatrick of PA on typo	008330-008331
2020-12-13 - 1521 - e-mail to Fitzpatrick, Roman re Foley art...	008332
2020-12-13 - 1526 - e-mail to Fitzpatrick, Roman full Foley ar...	008333
2020-12-13 - 1535 - TEXTS TO EPSHTEYN RE SENATE M...	008334-008344
2020-12-13 - 1545 - FITZPATRICK SENDS REVISED LANG	008345
2020-12-13 - 1604 - Roman asks what if	008346
2020-12-13 - 1624 - EMAIL TO FITPATRICK OF PA	008347-008348
2020-12-13 - 1640 - E-MAIL TO ROMAN, FITZPATRICK	008349-008351
2020-12-13 - 1954 - e-mail to Sinners on GA docs	008352-008353
2020-12-13 - 2004 - e-mail to Sinners on Guiliani	008354-008356
2020-12-13 - 2207 - E-MAIL ON SENATE STRATEGY T...	008357-008363
2020-12-14 - 0153 - Chesebro draft press release	008364-008365
2020-12-14 - 0924 - Epshteyn questions logic of a press release	008366
2020-12-14 - 1049 - Epshteyn resp on revised press release	008367-008369
2020-12-14 - 1120 - ROMAN E-MAIL RE NO PRESS REL	008370-008372
2020-12-14 - 1128 - e-mail to Troupis on no press release	008373-008376
2020-12-14 - 1130 - e-mails with Roman on no press release	008377-008380
2020-12-14 - 1146 - Schimming confirms no press release	008381-008384
2020-12-14 - 1633 - e-mail on mailing of WI certificates	008385-008386
2020-12-14 - 2021 - e-mail from MI we did it	008387
2020-12-14 - 2034 - e-mail from Troupis re WI cert petition	008388

2020-12-14 - 2039 - e-mail from MI on Dominion report	008389
2020-12-14 - 2314 - DeGraffenreid documentation of votes	008390
2020-12-14 - 2358 - Chesebro responds to DeGraffenreid	008391-008393
2020-12-15 - 0030 - Roman says great job on NV	008394-008396
2020-12-15 - 0213 - Law comments on WaPo article	008397-008398
2020-12-15 - 1215 - e-mail to Roman re MI certificates	008399-008400
2020-12-15 - 1338 - followup e-mail to Roman	008401-008403
2020-12-15 - 1344 - e-mail on WI mailing of certificates	008404
2020-12-15 - 1505 - answer on mailing of MI certs	008405-008408
2020-12-15 - GPO-J6-DOC-CTRL0000040476_00025 Findla...	008409-008413
2020-12-16 - 1222 - e-mail on mailing WI certificates	008414-008417
2020-12-18 - 1149 - Troupis on keeping meeting with Trump...	008418
2020-12-20 - 1401 - Youtube removing Troupis testimony	008419-008420
2020-12-20 - 1617 - Youtube scrubbing video of fed ct argu...	008421-008423
2020-12-21 - 1744 - EPSHTEYN REQ WI WORK W EAST...	008424-008433
2020-12-21 - 1951 - Troupis e-mail on WI cert petition	008434-008435
2020-12-21 - 2019 - e-mail planning WI cert petition	008436-008439
2020-12-22 - 0812 - e-mails arranging conference call on cert...	008440-008443
2020-12-22 - 0814 - further e-mail arranging conference call	008444
2020-12-22 - 0826 - DEFERENCE ON STRATEGY EVEN I...	008445-008448
2020-12-23 - 1106 - e-mail to Eastman	008449
2020-12-23 - 1111 - Eastman e-mail 1st draft of memo	008450-008452
2020-12-23 - 1116 - e-mail to Eastman will look at draft	008453
2020-12-23 - 1135 - e-mail to Eastman with edits	008454-008456
2020-12-23 - 1140 - Eastman e-mail to Epshteyn	008457-008459
2020-12-23 - 1146 - e-mail to Eastman link to Tribe article	008460
2020-12-23 - 1203 - E-MAIL TO EPSHTEYN ON CONG H...	008461-008463
2020-12-23 - 1217 - Eastman e-mail to Epshteyn	008464
2020-12-24 - 0820 - E-MAIL CHAIN WITH CLARK	008465-008467
2020-12-24 - 0944 - Eastman e-mail on WI cert petition	008468-008470
2020-12-24 - 0953 - FURTHER E-MAILS ON WI CERT PE...	008471-008475
2020-12-24 - 1002 - Bruce Marks e-mail on WI cert petition	008476-008480
2020-12-24 - 1003 - Troupis e-mail on budget for WI cert pet...	008481
2020-12-24 - 1137 - further Clark comments on WI	008482-008489
2020-12-24 - 1139 - further Eastman comments on WI	008490-008494
2020-12-24 - 1141 - further Eastman comment on WI	008495-008501
2020-12-24 - 1145 - CHESEBRO COMMENT ON WI	008502-008509
2020-12-24 - 1151 - final comment by Clark on WI	008510-008517
2020-12-24 - 1253 - TROUPIS ONQUALITY OF AZ CERT...	008518
2020-12-24 - 1302 - MARKS ON QUALITY OF AZ CERT...	008519
2020-12-24 - 1305 - E-MAIL CIRCULATING AZ CERT PET	008520-008521
2020-12-24 - 1434 - WI CERT PET LAUNCHED	008522-008530
2020-12-24 - 1437 - e-mail to Troupis on WI cert pet	008531-008533

2020-12-24 - 1458 - more logistics e-mails w Troupis	008534-008535
2020-12-25 - 1719 - MARKS E-MAIL TO WILENCHIK ON...	008536-008540
2020-12-26 - 1525 - TROUPIS E-MAIL TO CLARK ON WI...	008541
2020-12-26 - 1857 - E-MAIL ON PENCE FORCING ACTION	008542-008544
2020-12-26 - 1908 - Marks asks Chesebro for GA help	008545-008547
2020-12-27 - 1335 - Troupis e-mail on WI cert pet	008548-008549
2020-12-27 - 2303 - TROUPIS RE ADVICE TO PREIBUS...	008550-008554
2020-12-28 - 1622 - E-MAILS FOCUS ON REV OF WI PET	008555-008556
2020-12-28 - 1800 - e-mail on burden-shifting argument	008557-008559
2020-12-28 - 1821 - e-mails on motion to expedite	008560-008561
2020-12-28 - 1846 - e-mails on waiving reply	008562-008868
2020-12-28 - 2356 - Troupis on poss work at merits stage	008569
2020-12-29 - 0946 - e-mails on leaving GA out of mot to ex...	008570-008571
2020-12-29 - 1052 - Epshteyn sends Guiliani auth to file cert pet	008572-008574
2020-12-29 - 1810 - WI CERT PETITION FILED	008575-008576
2020-12-30 - 1514 - E-MAIL EMPHASIZING FILIBUSTER...	008577-008579
2020-12-30 - 2105 - e-mail on second WI cert petition	008580-008581
2020-12-30 - 2329 - Marks email for input on PA reply	008582
2020-12-30 - 2332 - Marks e-mail asking for more help in GA	008583-008585
2020-12-30 - 2350 - e-mail to Marks on reviewing PA reply	008586
2020-12-31 - 0021 - e-mail joke about lining Trump's pockets	008587
2020-12-31 - 0036 - e-mail on GA strategy	008588-008590
2020-12-31 - 0935 - GA STRATEGY FOCUS ON JUSTICE...	008591-008601
2020-12-31 - 0945 - Eastman e-mail on GA strategy	008602-008612
2020-12-31 - 0947 - Chesebro and Eastman e-mails on GA str...	008613-008624
2020-12-31 - 0955 - E-MAIL ON OVERALL SUPREME C...	008625-008637
2020-12-31 - 1025 - E-MAIL THAT GA VIOLATED ART 2	008638-008648
2020-12-31 - 1549 - Bock e-mail on GA strategy	008649-008664
2020-12-31 - 1700 - Marks e-mail on Trump not signing	008665-008681
2021-01-01 - 0003 - Marks e-mail on GA filing in Supreme Ct	008682-008683
2021-01-01 - 0910 - further e-mail on GA filing in Sup Ct	008684-008685
2021-01-01 - 1213 - Marks e-mail on GA status	008686-008702
2021-01-01 - 1529 - FORCE ACTION, HOLD UP COUNT	008703
2021-01-01 - 1617 - E-MAIL TO EASTMAN, EPSHTEYN...	008704-008707
2021-01-01 - 1622 - Marks e-mail agreeing with Bock sugg...	008708-008709
2021-01-01 - 1701 - e-mails Eastman and Epshteyn earlier texts	008710-008714
2021-01-01 - 1707 - Chesebro defers to Eastman	008715-008721
2021-01-01 - 1822 - Chesebro and Eastman e-mails	008722-008728
2021-01-01 - 1918 - Epshteyn on talking points	008729-008731
2021-01-01 - 2000 - JAN 6 STRATEGY OVERVIEW	008732-008736
2021-01-01 - 2024 - Eastman on talking points	008737-008740
2021-01-01 - 2036 - Eastman on deleting N&P Clause	008741-008743
2021-01-01 - 2225 - EASTMAN, EPSHTHYN ON JAN 6 FIL...	008744-008746

2021-01-02 - 1511 - to Eastman attaching Nov 18 e-mail	008747
2021-01-02 - 1524 - Marks e-mail saying he will be in DC Jan...	008748
2021-01-02 - 1943 - to Eastman FW Dec 13 e-mail	008749-008756
2021-01-03 - 2235 - Supreme Ct filing in PA case	008757-008774
2021-01-04 - 1530 - MORGAN RE DELIVERY MI & WI...	008775-008781
2021-01-04 - 1540 - E-MAIL TO MORGAN RE ROMAN	008782-008789
2021-01-04 - 2050 - MORGAN SUGG TROUPIS TO HELP...	008790-008793
2021-01-04 - 2251 - Dec 13 e-mail to Eastman 2 <sup>nd</sup> time	008794-008801
2021-01-04 - 2321 - Kesavan article to Eastman	008802
2021-01-05 - 0005 - law rev article to Eastman, Epshteyn	008803
2021-01-05 - 0010 - e-mails Seigel article to Eastman, Guiliani	008804
2021-01-05 - 0016 - Yoo article to Eastman	008805
2021-01-05 - 0049 - Foley article to Eastman, Guiliani	008806
2021-01-05 - 0059 - Josephson & Ross article to Eastman, Gui...	008807
2021-01-05 - 0100 - WI GOP on duplicate originals	008808-008812
2021-01-05 - 0743 - e-mail Alesha the WI courier	008813
2021-01-05 - 0754 - Ackerman article to Eastman, Guiliani	008814
2021-01-05 - 0758 - Eastman and Guiliani on Jefferson ex	008815-008816
2021-01-05 - 0954 - e-mail Brown on MI certs	008817
2021-01-05 - 1141 - logistics for getting WI certs	008818-008820
2023-10-15 - LESSIG EXPERT REPORT – FINAL	008821-008833
March 8 Discovery - 211 attachments	
2020-12-09 - 0003	
Chesebro draft of II-C	008834-008836
2020-12-09	
2020-12-09 Chesebro memo on Dec 14 req	008837-008841
Dec 9 draft of WI certificate	008842-008843
2020-12-10 - 1219	
2020-11-18 memo on real deadline	008844-008850
2020-12-09 memo on Dec 14 reqs for votes	008851-008855
Dec 9 draft of WI certificate	008856-008857
2020-12-10 - 1329	
elector certificate	008858-008859
2020-12-10 - 1419	
Dec 10 - DRAFT OF WI CERTIFICATES	008860-008862
2020-12-10 - 1434	
Dec 10 draft of cert of AZ electors	008863-008865
2020-12-10 - 1459	
2020-11-18 Chesebro memo on real deadline	008866-008872
2020-12-09 Chesebro memo on Dec 14 req	008873-008877
Dec 9 draft of WI certificate	008878-008879
2020-12-10 - 1530	
AZ-Dec 10 draft of cert of AZ	008880-008882

GA-Dec 10 draft of cert of GA	008883-008885
MI-Dec 10 draft of cert of MI	008886-008888
NV-Dec 10 draft of cert of NV	008889-008891
2020-12-10 - 1700	
Elector List	008892
2020-12-10 - 1701	
WI Dec 10 draft of certificate	008893-008895
WI Dec 10 draft of cover memo	008896-008897
2020-12-10 - 1810	
2020-12-09 Dec 14 req for elec votes	008898-008902
WI Dec 10 draft of cert of WI	008903-008905
WI Dec 10 draft of cover memo	008906
2020-12-10 - 1904	
2020-11-18 memo on real deadline	008907-008913
2020-12-09 memo on Dec 14 req for votes	008914-008918
2020-12-10 - 1946	
2020-12-09 memo on Dec 14 req for votes	008919-008923
2020-12-10 - 2051	
2020-11-18 memo on real deadline	008924-008930
2020-12-09 memo on Dec 14 reqs for votes	008931-008935
MI Dec 10 draft of certificate	008936-008938
2020-12-10 - 2203	
PA Dec 10 draft of certificate of PA	008939-008943
PA Dec 10 draft of cover memo	008944
2020-12-10 - 2208	
PA Dec 10 draft of certificate	008945-008949
PA Dec 10 draft of cover memo	008950
2020-12-10 - 2226	
MI Dec 10 draft of cover memo	008951-008952
2020-12-10 - 2237	
AZ Dec 10 draft of cover memo	008953
2020-12-10 - 2318	
2020-11-18 memo on real deadline	008954-008960
2020-12-09 memo on Dec 14 reqs for votes	008961-008965
NV Dec 10 draft of certificate	008966-008968
NV Dec 10 draft of cover memo	008969
2020-12-10 - 2344	
2020-11-18 memo on real deadline	008970-008976
2020-12-09 memo on Dec 14 reqs for votes	008977-008981
GA Dec 10 draft of certificate	008982-008984
GA Dec 10 draft of cover memo	008985
2020-12-10 -1416	
Dec 10 DRAFT OF WI ELECTORS CERT	008986-008988

2020-12-11 - 0102	
GA Dec 10 draft of certificate	008989-008993
2020-12-11 - 0120	
2020-11-18 memo on real deadline	008994-009000
2020-12-09 memo on Dec 14 reqs for votes	009001-009005
NV Dec 10 draft of cert	009006-009008
NV Dec 10 draft of cover memo	009009
2020-12-11 - 1007	
DRAFT-Draft Ballots for PA Electors	009010
DRAFT-Electoral College Certificate PA	009011-009012
DRAFT-Electoral College How To-MI	009013
DRAFT-Electoral College How To-NV	009014
DRAFT-Electoral College How To-PA	009015
DRAFT-MI Ballots_President	009016-009031
DRAFT-MI Ballots_Vice President	009032-009047
DRAFT-State of NV Certificate of Vote Form	009048
Electoral College Certificate of Vote-MI	00904+
Electoral College Certificate of Vote-AZ	009050-009051
Electoral College Certificate of Vote-GA	009052-009054
Electoral College How To-AZ	009055
Electoral College How To-GA	009056
2020-12-11 - 1216	
Appendix Ward v. Jackson, et al	009057-009143
motion to expedite Ward v. Jackson	009144
Petition for Writ Ward v. Jackson, et al	009145-009166
service Ward v. Jackson	009167
2020-12-11 - 1231	
Your Electronic Filing record has been submitted	009168
2020-12-11 - 1428	
1-How to cast Electoral votes in PA-edited	009169-009170
2020-12-11 - 1454	
1-How to cast Electoral votes in MI	009171-009173
2-Draft press release for MI Republican party	009174
3-Form to fill MI Electoral College vacancies	009175
4 -MI Electoral College Ballots for President	009176-009199
4B-MI Electoral College Ballots for VP	009200-009223
5-Certificate of the Votes of MI	009224-009225
6-Cover memo to enclose in mailing	009226
2020-12-11 - 1527	
1-How to cast Electoral votes in PA edited	009227-009228
2-Draft press release for PA Republican party	009229
4A-PA Electoral College Ballots for President	009230-009257
4B-PA Electoral College Ballots for VP	009258-009285

5-Certificate of the Votes of PA	009286-009287
6-Cover memo to enclose in mailing	009288
2020-11-18 Chesebro memo on real deadline	009289-009295
2020-12-09 Chesebro memo on Dec 14 reqs	009296-009300
2020-12-11 - 1528	
1-How to cast Electoral votes in MI	009301-009303
2-Draft press release for MI Republican party	009304
3-Form to fill MI Electoral College vacancies	009305
4A-MI Electoral College Ballots for President	009306-009329
4B-MI Electoral College Ballots for VP	009330-009353
5-Certificate of the Votes of MI	009354-009355
6-Cover memo to enclose in mailing	009356
2020-12-11 - 1625	
1-How to cast Electoral votes in PA-edited	009357-009358
2-Draft press release for PA Republican party	009359
3-Forms to fill PA Electoral College vacancies	009360-009362
4A-PA Electoral College Ballots for President	009363-009390
4B-PA Electoral College Ballots for VP	009391-009418
5-Certificate of the Votes of PA	009419-009420
6-Cover memo to be enclosed in mailing	009421
2020-12-11 - 1729	
1-How to cast Electoral votes in GA	009422-009423
2-Draft press release for GA Republican party	009424
4A-GA Electoral College Ballots for President	009425-009442
4B-GA Electoral College Ballots for VP	009443-009460
5-Certificate of the Votes of GA	009461-009463
6-GA Cover memo to enclose in mailing	009464
2020-12-11 - 1817	
1-How to cast Electoral votes in GA—CORRECTED	009465-009466
2020-12-11 - 1839	
1-How to cast Electoral votes in MI	009467-009469
2-Draft press release for MI Republican party	009470
3-Form to fill MI Electoral College vacancies	009471
4A-MI Electoral College Ballots for President	009472-009495
4B-MI Electoral College Ballots for VP	009496-009519
5-Certificate of the Votes of MI	009520-009521
6-Cover memo to enclose in mailing	009522
2020-12-11 - 1850	
1-How to cast Electoral votes in AZ	009523-009524
2-Draft press release for AZ Republican party	009525
3-Form to fill AZ Electoral College vacancies	009526
4A-AZ Electoral College Ballots for President	009527-009540
4B-AZ Electoral College Ballots for VP	009541-009554

5-Certificate of the Votes of AZ	009555-009557
6-AZ Cover memo to enclose in mailing	009558
2020-12-11 - 1954	
1-How to cast Electoral votes in NV	009559-009561
2-Draft press release for NV Republican party	009562
3-Form to fill NV Electoral College vacancies	009563
4A-NV Electoral College Ballots for President	009564-009572
4B-NV Electoral College Ballots for VP	009573-009581
5-Certificate of the Votes of NV	009582-009584
6-AZ Cover memo to enclose in mailing	009585
2020-12-11 - 2013	
Draft press release for state Republican party	009586
2020-12-11 – 2051-1	
1-How to cast Electoral votes in WI	009587-009588
2-Draft press release for WI Republican party	009589
3-Form to fill WI Electoral College vacancies	009590
4A-WI Electoral College Ballots for President	009591-009603
4B-WI Electoral College Ballots for VP	009604-009616
5-WI Certificate of the Votes	009617-009618
6-WI Cover memo to enclose in mailing	009619
2020-12-11 – 2051-2	
1-How to cast Electoral votes in WI	009620-009621
2-Draft press release for WI Republican party	009622
3-Form to fill WI Electoral College vacancies	009623
4A-WI Electoral College Ballots for President	009624-009636
4B-WI Electoral College Ballots for VP	009637-009649
5-WI Certificate of the Votes	009650-009651
6-WI Cover memo to enclose in mailing	009652
2020-12-11 - 2058	
1-How to cast Electoral votes in WI	009653-009654
2-Draft press release for WI Republican party	009655
3-Form to fill WI Electoral College vacancies	009656
4A-WI Electoral College Ballots for President	009657-009669
4B-WI Electoral College Ballots for VP	009670-009682
5-WI Certificate of the Votes	009683-009684
2020-12-12 - 1047	
1-How to cast Electoral votes in AZ	009685-009686
2-Draft press release for AZ Republican party	009687
3-Form to fill AZ Electoral College vacancies	009688
4A-AZ Electoral College Ballots for President	009689-009702
4B-AZ Electoral College Ballots for VP	009703-009716
5-Certificate of the Votes of AZ	009717-009719
6-AZ Cover memo to enclose in mailing	009720

2020-12-12 - 1830	
1-How to cast Electoral votes in AZ	009721-009722
2-Draft press release for AZ Republican party	009723
3-Form to fill AZ Electoral College vacancies	009724
4A-AZ Electoral College Ballots for President	009725-009738
4B-AZ Electoral College Ballots for VP	009739-009752
5-Certificate of the Votes of AZ	009753-009755
6-AZ Cover memo to enclose in mailing Certs	009756
2020-12-12 - 2007	
1-How to cast Electoral votes in AZ	009757-009758
2-Draft press release for AZ Republican party	009759
3-Form to fill AZ Electoral College vacancies	009760
4A-AZ Electoral College Ballots for President	009761-009774
4B-AZ Electoral College Ballots for Vice President	009775-009788
5-Certificate of the Votes of AZ Trump-Pence electors	009789-009791
6-AZ Cover memo to be enclosed in mailing	009792
2020-12-12 – 2232	
2020-12-09 Chesebro memo on Dec 14 reqs for votes	009793-009797
UPDATED LANGUAGE Cert of the Votes of PA	009798-009799
2020-12-13 - 0028	
1-How to cast Electoral votes in NM	009800-009802
2-Draft press release for NM Republican party	009803
3-NM Form to fill Electoral College vacancies	009804
4A-NV Electoral College Ballots for President	009805-009812
4B-NM Electoral College Ballots for VP	009813-009820
5-NM Certificate of the Votes	009821-009823
6-NM Cover memo to be enclosed in mailing	009824
2020-12-13 – 1521	
51 Loyola U Chi Rev at 345	009825
2020-12-13 - 1526	
2009 Foley article	009826-009879
2020-12-13 - 1545	
12.13.20 UPDATED LANG Cert of Votes PA	009880-009881
2020-12-13 - 1954	
3-Form to fill GA Electoral College vacancies	009882-009884
2020-12-14 - 0153 Attachment	
Draft press rel for state Rep parties 4 after vote	009885
2020-12-14 - 2314	
Addressed outer envelopes Dec 14 2020	009886
Cover Memo for Electoral Votes Dec 14 2020	009887
Elector process instructions Dec 2020	009888-009892
Pres Elector Cert and Ballots Dec 14 2020	009893-009900
Tracking Forms Elector Mailings Dec 14 2020	009901

USPS Receipt Nevada Dec 14 2020	009902
VP Elector Cert and Ballots Dec 14 2020	009903-009910
2020-12-23 - 1111	
January 6 scenario	009911-009912
2020-12-23 - 1135	
PRIVILEGED...Dec 23 memo on Jan 6	009913-009914
2020-12-23 - 1140	
PRIVILEGED...Dec 23 memo on Jan 6	009915-009916
2020-12-23 - 1217	
PRIVILEGED...Dec 23 memo on Jan 6	009917-009918
2020-12-24 - 1305	
Appendix Ward v. Jackson, et al	009919-010005
motion to expedite Ward v. Jackson	010006
Petition for Writ Ward v. Jackson, et al	010007-010028
service Ward v. Jackson	010029
2020-12-26 - 1908	
PD 1 Emergency Pet For Writ of Certiorari	010030-010278
2020-12-29 - 1810	
Certificate of Compliance	010279
Certificate of Service	010280-010281
MotionForExpeditedConsideration	010282-010286
No. 20-__PetitionForAWritOfCertiorari	010287-010511
2020-12-30 - 1514	
Kesavan excerpts on limited debate	010512-010515
2020-12-30 - 2329	
Trump SCOTUS PA Reply Exp Mot	010516-010521
2020-12-30 - 2332	
Trump Georgi PI Memo of Law	010522-010538
2020-12-31 - 0036	
Trump Georgi PI Memo of Law KC	010539-010556
2021-01-01 - 0003	
Certificate of Service - Reply	010557-010570
Reply ISO Expedite Motion	010571-010577
2021-01-02 -1511	
2020-11-18 Chesebro memo on real deadline	010578-010584
2021-01-03 - 2235	
Reply ISO Expedite Motion	010585-010591
2021-01-05 - 0005	
Land & Schultz 2016	010592-010612
March 8 Discovery - 11 native emails	
2020-12-09 - 1427 - FW_ elector certificate draft	010613-010618
2020-12-10 - 1329 - Fwd_ elector certificate	010619-010623
2020-12-10 - 1416 - Re_ elector certificate	010624-010630

2020-12-10 - 1419 - Re_ [EXTERNAL]Re_ Electors	010631-010637
2020-12-10 - 1458 - Re_ elector certificate	010638-010643
2020-12-10 - 1530 - Re_ Urgent - getting names of electors	010644-010663
2020-12-10 - 1701 - Fw_ Statement on electors mtg _ Draft	010664-010671
2020-12-10 - 1810 - Re_ [EXTERNAL]Re_ Elector info	010672-010684
2020-12-11 - 1007 - Re_ [EXTERNAL]Re_ Electors	010685-010738
2020-12-11 - 2051 - Re_ Presidential Electors Litigation States	010739-010774
2020-12-11 - 2058 - Dec. 14 vote of Electors 7 documents f...	010775-010807
March 8 Discovery - Badger Pundit	
DanODonnellShow 12-16-20to 1-9-21	010808-010809
BrianSchimming 2014	010810
DBRodriguez5 12-29-20	010811
JedShug 12-29-20	010812
RealAlexJones 2017	010813
JudgeTroupis 2017	010814
LegInsurrection 12-16-20 to 12-29-20	010815
GatewayPundit (Jim Hoft) 11-9-20 to 1-10-21	010816-010819
JWigerson 12-16-20 to 12-29-20	010820
VickiMcKenna 11-5-20 to 1-20-21	010821-010837
Replies to others' tweets from Sept 2020 to 6 Jan 2021	010838-010979
Sept 2020 tweets to final tweets in August 2022	010980-010992
March 8 Discovery - 7 photos of WI Trump electors voting	
IMG_5234	010993
IMG_5240	010994
IMG_5241	010995
IMG_5242	010996
IMG_5243	010997
IMG_5245	010998
IMG_5247	010999
March 8 Discovery - video of electors meeting	
Chesebro video of WI Trump electors meeting (1)	011000
The Chesebro Memos	
Dec 6 Chesebro Memo	011001-011006
Dec 9 Chesebro Memo	011007-011011
Dec 13 Chesebro Memo	011012-011015
Dec 23 Eastman Memo	011016-011017
Jan 3 Eastman Memo	011018-011022
Nov 18 Chesebro Memo	011023-011029
via Law Forward_ Wisconsin Civil Case 3-4-2024	
2023-12-09 Confidential Chesebro Proffer	
200EC0~1	011030-011031
2008BA~1	011032-011035
2015CC~1	011036-011038

Troupis via Law Forward_WI Civil Case 3-4-2024	
3.1.24 Redacted Troupis Settlement	011039-011042
Redacted Troupis Privilege Log	011043-011309
Troupis 008910 - Troupis 010348	011310-012748
2020-12-14 - photos at WI capitol of Trump electors voting	012749-012755
2020-12-14 - WI Trump-Pence electors meeting	012756
Chesebro Docs Index PRINT, SCAN, BATES	012757-012763
Chesebro Signed Settlement Agreement	012764-012771
Texts Chesebro-Troupis	012772-012871
Another Chesebro law complaint	012872-012887
Chesebro at Nevada GJ	012888-012944
Chesebro Badger Pundit tweets (uncovered feb 2024)	012945-015023
Chesebro Dec. 6, 2020 memo & NYT story	015024-015032
Chesebro Flew Wisconsin Vote to DC	015033
Chesebro FT Audio 12-11-23 (1)	015034
Chesebro FT Audio 12-11-23 (2)	015035
Chesebro FT Audio 12-11-23 (2)	015036
Chesebro FT Audio 12-11-23 (4)	015037
Chesebro FT Audio 12-11-23 (complete)	015038
Chesebro FT Transcript 12-11-23 (1)	015039-015067
Chesebro FT Transcript 12-11-23 (2)	015068-015094
Chesebro FT Transcript 12-11-23 (3)	015095-015120
Chesebro FT Transcript 12-11-23 (4)	015121-015144
Chesebro Interview 3-8-24 (1)	015145
Chesebro Interview 3-8-24 (2)	015146
Chesebro Interview 3-8-24 (3)	015147
Chesebro J6 Depo	015148-015252
Chesebro Law Complaint	015253-015267
Chesebro says Congress has debate opportunity in email	015268-015270
K. Chesebros Reply Brief In Support Mot To Dismiss Indictment...	015271-015278
Ken Chesebro Exhibits for Interview last update 12 10 23 2246	015279-015406
Untitled email 2-16-24	015407-015408

### **LEE MILLER**

Lee Miller Interview 1-9-24	015409
-----------------------------	--------

### **LORRAINE PELLEGRINO**

L Pellegrino Exhibits	015410-015431
Arizona's Trump backers refuse to explain alternate electors plan	015432-015437

### **MARK FINCHEM**

Finchem J6 Interview	015438-015598
GOP officials still fighting Arizona's vote tally...	015599-015621

**MARK MEADOWS**

How Mark Meadows Became the Least Trusted Man in Washing... 015622-015643

**MICHAEL WARD**

MW Exhibit 015644-015650  
Tweet – M Ward 7 015651  
Tweet – M Ward 8 015652  
Tweet – M Ward 9 015653  
Tweet – M Ward 10 015654  
Tweet – M Ward 11 015655  
Tweet – M Ward 12 015656  
Tweet – M Ward 13 015657  
Tweet – M Ward 14 015658  
Tweet – M Ward 15 015659  
Tweet – M Ward 16 015660  
Tweet – M Ward 19 015661  
Tweet – M Ward 155 015662

**NANCY COTTLE**

N Cottle 11-4-2020 015663  
N Cottle 11-5-2020 015664  
N Cottle Exhibits 015665-015685  
Nancy Cottle us Parler @AzGopGirl on Twitter\_\_Well done patri... 015686-015687  
Throat Punch Tweet 015688-015735

**ROBERT MONTGOMERY**

AZ Alt Electors vote via National Archives 019899-019903  
Group Picture 019904-019905  
RM Exhibit 019906  
RM SGJ Exhibit 019907-019915  
Sierra Vista Herald Article 019916-019924  
Signing Video 019925-019926

**ROBERT SINNERS**

Robert Sinners Call w AGO 2-28-24 019927

**RUDY GIULIANI**

Giuliani J6 Depo 019928-020172  
Produced to J6 by Rudy 020173-020174  
Rudy on 12-14 coordinating with Trump etc 020175-020184

**RUSTY BOWERS**

2023-11-22 Diary Scan Final - redacted	020185-020195
Bowers Dec 2 Diary Entry 2.7	020196
Rusty Bowers Interview #1 (in person)	020197
Rusty Bowers Interview #2 1-12-24	020198
Rusty Bowers on 60 Minutes	020199
Rusty video of threats	020200
Rusty video to have a hearing	020201

**SAMUEL MOOREHEAD**

Sam Moorhead Interview 6-20-23	020202
SM Exhibit	020203-020208

**STEVE CHUCRI**

Steve Chucri Interview 9-18-23	020209
Steve Chucri Interview 10-4-23	020210

**TYLER BOWYER**

Arizona fake electors led vocal campaign to overturn...	020211-020214
Arizona's Trump backers refuse to explain alternate electors plan	020215-020220
Elector Exhibits (1 <sup>st</sup> 12pgs)	020221-020232

**ELECTORAL COLLEGE FACTS 2020**

Electoral College Facts (1)	020233-020234
Electoral College Facts (2)	020235-020236
Electoral College Facts (3)	020237-020250

**J6 DEPOSITIONS AND INTERVIEWS**

Bernard Kerik Interview 1-13-22	020251-020477
Bill Stepien J6 Interview 2-10-22	020478-020695
BOS J6 Production 1	020696
BOS J6 Production 2	020697-020709
Christina Bobb J6 Interview 4-21-22	020710-020890
Jason Miller J6 Deposition 2-3-22	020891-021193
Jenna Ellis J6 Deposition 3-8-22	021194-021259
Marc Short J6 Deposition 1-26-22	021260-021516
Matt Morgan J6 Deposition 3-24-22	021517-021663
Molly Michaels J6 Deposition 3-24-22	021664-021885
Ronna McDaniel J6 Interview 6-1-22	021886-021944
Russell Bowers J6 Interview 6-19-22	021945-022002

**OTHER INDICTMENTS**

Coup in Search of a Theory (J6 Committee)	022003-022072
---	---------------

General Demurrers Indictment – Chesebro	022073-022083
Georgia Indictment	022084-022181
Michigan Indictment	022182-022202
US v Trump et al. Indictment	022203-022247

**LAWSUITS AND COURT RULINGS**

Gohmert-Ward vs Pence 12-27-20 (Complaint)	022248-022275
Gohmert-Ward vs Pence 12-27-20 (Exhibit A Joint Resolution)	022276-022279
Gohmert-Ward vs Pence 12-31-20 (Pence reply)	022280-022305
Judge Carter Ruling in Eastman Bar Case 3-28-22	22306-022349
Master Dates of Trump Cases 10-2-23	022350-022355
Trump vs Hobbs Lawsuit 11-2020	022356-022391

**PRESSURE CAMPAIGN**

Basic Script	022392
Can someone be the affiant Mr. Lane	022393-022396
Chesebro email to Eastman on VP role on Jan 6	022397-022401
Giuliani 12-27-2020 Plan	022402-022422
Giuliani text to Karen Fann Pressure	022423-022435
Got Freedom Meeting about Pressure Campaign	022436-022437
Jack Sellers Text Messages Dec 24 into 2021	022438-022450
Jason Miller’s email call to action call Govs and Legislature	022451-022458
Jason Miller’s text with Jared about legislature pressure	022459-022472
Kerik email to Meadows re Pressure Campaign	022473-022474
Rusty Bowers J6 Interview	022475-022532
Stephen Miller Lets the cat out of the bag	022533-022537
WH group call with Clint Hickman	022538-022546
WH Switchboard Log call to Gohmert et al	022547-022556

**BILL STEPIEN**

Bill Stepien Interview 4-11-24	022557
--------------------------------	--------

**GREG SAFSTEN #2**

Spam and Trash	
AZGOP Update Petition, Certification, and Election Hearing	022558-022559
Certificate of Election Biggs	022560
Christina’s Cover Letter 2020	022561
Congress Challenging the Election Results & Electors	022562-022564
Did you see my last email	022565-022568
Dr. Peter A. just messaged you	022569
Dr. Rebecca just messaged you	022570
Election Crisis Update	022571-022580
Electors	022581

Freedom under assault in AZ	022582-022593
Fwd #1 – Email from Terrie Frankel November 1, 2020 – 45...	022594-022596
Fwd #1 – Email from Terrie Frankel November 1, 2020 – 45...	022597-022599
Fwd 2020 Maricopa County Presidential Race Independent A...	022600-022602
Fwd 2020 Maricopa County Presidential Race Independent A...	022603-022604
Fwd 2020 Maricopa County Presidential Race Independent A...	022605-022606
Fwd Decision in lawsuit challenging policies and procedures...	022607-022608
Fwd Decision in lawsuit challenging policies and procedures...	022609
Fwd Election Day File 147	022610-022611
Fwd Election Day File	022612-022613
Fwd Maricopa canvass-undervote counts	022614-022616
Fwd Master Contact List By Role & State	022617
Fwd Tamara Holley Observer Pima County	022618-022620
Fwd Tamara Holley Observer Pima County_106	022621-022622
Fwd The Duty of Legislators 150	022623
Fwd The Duty of Legislators	022624-022625
Fwd Today I attended Maricopa County...	022626-022628
Fwd Today I attended Maricopa County...90	022629-022630
Fwd Tuba City Coconino	022631-022634
Fwd Tuba City Coconino_176	022635-022637
Fwd With 163 precincts	022638-022639
Fwd With 163 precincts_188	022640-022641
Have you stepped up yet	022642-022645
House and Senate are in Session	022646-022651
Maricopa Server	022652-022655
Master Contact List By Role & State	022656
Online Access to VPN Folder State Republican Rep Party	022657-022658
Re Electors 184	022659-022665
Re Electors 185	022666-022672
RE Electors 186	022673-022678
Re Electors 189	022679-022686
Re Electors	022687-022694
Re Electors_190	022695-022702
Re Electors_191	022703-022710
Re Electors_192	022711-022718
Re Electors_193	022719-022725
Re Electors_194	022726-022732
Re Electors_195	022733-022738
Re Electors_196	022739-022744
Re Electors_197	022745-022749
Re Electors_198	022750-022755
Re Electors_199	022756-022760
RE Electors_200	022761-022765

Re Electors_201	022766-022770
RE Electors_202	022771-022774
Re Electors_203	022775-022778
Re Electors_204	022779-022782
RE Electors_205	022783-022786
RE Electors_206	022787-022789
RE Electors_207	022790-022791
Re Maricopa Canvass-undervote counts	022792-022794
Re Master Contact List By Role & State	022795
Re The Duty of Legislators	022796-022797
Re Tuba City Coconino	022798-022801
Read Before Hearing Tomorrow	022802-022803
Save AZ & Video Evidence	022804-022809
Tweet	022810
Urgent–Trump campaign	022811
Garbage	
1 new job for government affairs 18	022812-022813
1 new job for government affairs 24	022814-022815
1 new job for government affairs 41	022816-022817
new job for government affairs 42	022818-022819
1 new job for government affairs 49	022820-022821
1 new job for government affairs	022822-022823
1 new job for government relations 115	022824-022825
1 new job for government relations 32	022826-022827
1 new job for government relations 37	022828-022829
1 new job for government relations 68	022830-022831
1 new job for government relations 78	022832-022833
1 new job for government relations 97	022834-022835
1 new job for government relations	022836-022837
2 new jobs for government affairs	022838-022839
2 new jobs for government relations 169	022840-022841
2 new jobs for government relations	022842-022843
5 new jobs for government affairs	022844-022845
92	022846
160000 fraudulent votes in Arizona Plus upcoming events	022847-022856
A Bunch of F ers	022857-022860
Advocate this Holiday season with Hownd for the Holidays...	022861-022864
Are YOU Ready	022865-022868
Arizona’s wants to join your network	022869
At San Tan Ford servicing your vehicle is easy at our clean sa...	022870-022878
AZ HAND COUNT	022879-022881
Black Friday	022882-022884
Can we share your resume with Indeed	022885-022886

Changes to YouTube's Terms of Service	022887-022888
Chris Farrell on Onve America News Network this Weekend!	022889-022891
Christina's Resume 2020	022892
Clinton Judge Sides with Leftist Groups to Stop Asylum	022893-022899
December Network QC Luncheon Virtual Edition	022900-022903
December Vehicle Update for your 2019 FORD MUSTANG...	022904-022905
Dues Letter	022906
Election Day Tomorrow	022907-022909
Enter for Your Chance to Win \$5,000 Towards Your Vacation!	022910-022911
Ex-Con Hired by D.C. as Violence Interrupter Arrested, Cha...	022912-022918
Facebook password change 50	022919
Facebook password change	022920
FINAL 10 DAYS!	022921-022923
FINAL 9 DAYS!	022924-022926
Fwd Dues Letter	022927
FWD If everyone gave 3	022928-022930
Fwd New Name	022931
Fwd Re Join us for our LD12 Christmas Party and Service Proj...	022932-022936
Fwd Safsten Family Christmas 2020 Invite	022937-022938
Fwd Thank you from the LD12 Republican's for your hard work	022939-022941
Gary just messaged you	022942
Gilbert Chamber News and Upcoming Events	022943-022947
Grand Lodge of Virginia Announcement Light A Publication	022948-022950
GREG 1 new job for government affairs in Arizona, United Sta...	022951-022952
GREG 1 new job for government relations' in Arizona, United...	022953-022954
GREG 1 new job for government relations' in Arizona, United...	022955-022956
GREG 2 new jobs for government affairs' in Arizona, United...	022957-022958
GREG 2 new jobs for government relations' in Arizona, Unite...	022959-022960
GREG 3 new jobs for government affairs' in Arizona, United...	022961-022962
GREG 5 new jobs for government relations' in Arizona, Unite...	022963-022964
GREG 6 new jobs for government affairs' in Arizona, United...	022965-022966
Greg Management opportunity	022967
Greg Senior role candidature 170	022968
Greg Senior role candidature	022969
GREG, it's been a while	022970-022971
Greg, log into Facebook with one click	022972
GREG, our COVID Support Team Needs Your Help	022973-022974
GREG, you have new privacy suggestions	022975-022977
Gregory, finish the year strong with a new Ford	022978-022986
Gregory, get the Ford for your lifestyle	022987-022993
Happy Birthday	022994
Happy Holidays from the Mesa Chamber of Commerce	022995-022997
HAPPY HOLIDAYS	022998

Happy New Year!!!	022999
Happy Thanksgiving!	023000-023001
HAPPY THANKSGIVING	023002
Hassell Family 2020 Christmas Video Card	023003
HKF-JB December Tresleboard	023004
HKF-JB Trestleboard January 2021	023005
Homeless Veterans Need Your Help 157	023006-023007
Homeless Veterans Need Your Help! 134	023008-023009
Homeless Veterans Need Your Help! 62	023010-023011
Homeless Veterans Need Your Help! 85	023012-023013
Homeless Veterans Need Your Help!	023014-023015
House Debates National Defense Authorization Act	023016-023022
How was your support from Instacart	023023-023025
Ian just messaged you	023026
Important policy changes for Google Account storage	023027-023029
In Reference to Your 2019 Ford	023030
In Reference to Your 2019 Ford_110	023031
In Regards to Your 2019 Ford	023032
January Vehicle Update for your 2019 FORD MUSTANG B...	023033-023034
John just messaged you	023035
Judicial Watch TV Weekend Playback	023036-023041
LAST 2 DAYS!	023042-023044
LAST CHANCE Gregory, a brand new Ford is a gift we all...	023045-023051
LAST CHANCE Gregory, finish the year strong with a new Ford	023052-023060
Lodge Ritual School	023061
LRS Installation Practice Tomorrow 630pm!!	023062
LRS This Tuesday 630pm	023063
LRS tonight! HKF JB lodge room	023064
LRS tonight!!!	023065
Lucas just messaged you	023066
Mesa Chamber Monday Message Aging & Healthcare, Non-P...	023067-023077
Mesa Chamber Monday Message Join us for Lunch, Prepare...	023078-023089
Mesa Chamber Monday Message Prepare for the Holidays...	023090-023102
Mesa Chamber Monday Message RSVP for #MesaTakeout M...	023103-023114
Mesa Chamber Monday Message RSVP for Non Profit Vitali...	023115-023128
Mesa Chamber Monday Message The Giving Catalog is here...	023129-023142
Mesa Chamber Monday Message Use our calendar to reengag...	023143-023151
New Name	023152
NO LRS TONIGHT	023153
Open early Our cozy holiday guide is here.	023154-023158
PC Appointment Form Please Return ASAP	023159-023162
Re Christina's Resume 2020	023163
Re follow up	023164

Robert just messaged you	023165
Safsten Family Christmas 2020 Invited	023166-023167
Safsten Family Info Spreadsheet	023168
Security alert	023169
Share your resume with Indeed	023170-023171
Stated Communication Closed Installation tomorrow.	023172
Stephen A. just messaged you 58	023173
Stephen A. just messaged you	023174
Tell us how we did	023175-023176
Thank you from the LD12 Republican's for your hard work!	023177-023179
Thankful for our Customers Unlimited Meetings November 26 <sup>th</sup>	023180-023183
Thanks for shopping with us! Here's your order 9067315035...	023184-023187
The Crux of Our Pre-Cyber Sale Choosing From Hundreds of...	023188-023193
The one and only...	023194-023195
TODAY IS THE LAST DAY!	023196-023198
Trump Calendat	023199-023202
U.S. Pays Costa Rica to Hire More Female Cops as Police at H...	023203-023209
Virtual Travel Talk Close to Home Destinations with GLOBU...	023210-023213
We make it easy to follow the new Congress	023214-023220
Welcome to Apres Cybe After-Hour Deals	023221-023222
We've updates our Terms of Use	023223-023224
William G. just messaged you	023225
William G. wants to join your network	023226
Your Dropbox needs more space	023227
Your Fry's order is confirmed for December 6	023228-023230
Your Instacart order receipt	023231-023236
Your order is ready for in-store pickup at Gilbert Gateway!...	023237-023240
Your password has been updated successfully	023241-023242
Your Receipt #123933 from AZ Jolly Jumpers Party Rentals-...	023243-023244
Entire Gmail Return	
<a href="#">greg***@gmail.com.846745226756.AccessLogAc4bea530a</a>	023245
<a href="#">greg***@gmail.com.846745226756.AccessLogAcfb37605d</a>	023246
<a href="#">greg***@gmail.com.846745226756.AccessLogActivity...</a>	023247
<a href="#">greg***@gmail.com.846745226756.AccessLogActivity...</a>	023248
<a href="#">greg***@gmail.com.846745226756.Calendar.Ca0f77c79b</a>	023249
<a href="#">greg***@gmail.com.846745226756.Calendar.Calendars ...</a>	023250
<a href="#">greg***@gmail.com.846745226756.Calendar.Use799869c</a>	023251
<a href="#">greg***@gmail.com.846745226756.Calendar.UserSettings...</a>	023252
<a href="#">greg***@gmail.com.846745226756.Contacts.Co3fb005e8</a>	023253
<a href="#">greg***@gmail.com.846745226756.Contacts.Contacts_001</a>	023254
<a href="#">greg***@gmail.com.846745226756.Drive.Drive9f53aa37</a>	023255
<a href="#">greg***@gmail.com.846745226756.Drive.DriveFiles_001</a>	023256
<a href="#">greg***@gmail.com.846745226756.DriveAssoci0f0e3e76</a>	023257

<a href="#">greg***@gmail.com.846745226756.DriveAssociatedTarge...</a>	023258
<a href="#">greg***@gmail.com.846745226756.DriveMobile0690e9e3</a>	023259
<a href="#">greg***@gmail.com.846745226756.DriveMobileBackups...</a>	023260
<a href="#">greg***@gmail.com.846745226756.GoogleAccou2410113a</a>	023261
<a href="#">greg***@gmail.com.846745226756.GoogleAccount.Subsr...</a>	023262
<a href="#">greg***@gmail.com.846745226756.GoogleChat.3c4615f2</a>	023263
<a href="#">greg***@gmail.com.846745226756.GoogleChat.a94f814b</a>	023264
<a href="#">greg***@gmail.com.846745226756.GoogleChat.aaafd496</a>	023265
<a href="#">greg***@gmail.com.846745226756.GoogleChat.dc636db6</a>	023266
<a href="#">greg***@gmail.com.846745226756.GoogleChat.GroupInf...</a>	023267
<a href="#">greg***@gmail.com.846745226756.GoogleChat.GroupTa...</a>	023268
<a href="#">greg***@gmail.com.846745226756.GoogleChat.Messages...</a>	023269
<a href="#">greg***@gmail.com.846745226756.GoogleChat.UserInfo...</a>	023270
<a href="#">greg***@gmail.com.846745226756.GooglePhoto72b6876c</a>	023271
<a href="#">greg***@gmail.com.846745226756.GooglePhoto385b24ee</a>	023272
<a href="#">greg***@gmail.com.846745226756.GooglePhoto8445ebdf</a>	023273
<a href="#">greg***@gmail.com.846745226756.GooglePhotos.PhotoR...</a>	023274
<a href="#">greg***@gmail.com.846745226756.GooglePhotos.PrintSu...</a>	023275
<a href="#">greg***@gmail.com.846745226756.Mail.Messag6ca2a674</a>	023276
<a href="#">greg***@gmail.com.846745226756.Mail.Messag2360d6c3</a>	023277
<a href="#">greg***@gmail.com.846745226756.Mail.Messagb28f9128</a>	023278
<a href="#">greg***@gmail.com.846745226756.Mail.MessageContent...</a>	023279
<a href="#">greg***@gmail.com.846745226756.Mail.MessageInformati</a>	023280
<a href="#">greg***@gmail.com.846745226756.Mail.Messagf3c1a599</a>	023281
<a href="#">greg***@gmail.com.846745226756.Tasks.TaskL0bae23b1</a>	023282
<a href="#">greg***@gmail.com.846745226756.Tasks.TaskList_001</a>	023283
msgFilterRules	023284
Trash	023285
Trash.msf	023286
Unsent Messages	023287
Unsent Messages.msf	023288

**JASON MILLER #2**

Jason Miller text that need lawsuits to keep effort going 023289-023298

**MARK MEADOWS #2**

Mark Meadows FULL text log(1) PROD003 023299-023433  
 Mark Meadows FULL text log(2) Orig Chat Metadata 023434-023512  
 Mark Meadows FULL text log(3) Sheet 1 023513  
 Mark Meadows FULL text log(4) Sheet 2 023514

**BRIAN SEITCHIK #2**

Brian Seitchik Interview 2-22-24 023515

<b>CASSIDY HUTCHINSON #2</b>	
Cassidy Hutchinson Interview 5-15-24	023516
<b>DOUG DUCEY</b>	
Doug Ducey Interview 2-21-24	023517
<b>JAKE HOFFMAN #2</b>	
2023 CRP Reimbursement Rate Schedule 022123	023518
2023 Interpreting All T-Mobile Records 20230905	023519-023550
4677300 ARO	023521-023553
4677300_20231020_Certification	023554
4677300_20231020_OBJ	023555
4809805132 Sprint sub 2023-037786	023556-023557
FAQ - Data Retention Changes – 230501	023558
SUB_Tibco_4809805132_13869440	023559
<b>JASON MILLER #2</b>	
Jason Miller Interview 3-22-24	023560
<b>MURRAY SNOW</b>	
02356AZ GOP Cov	023561-023563
Certified envelope from Judge Snow	023564
Inside envelope from Judge Snow	023565
Judge Snow's Cover for POTUS	023566
Judge Snow's Cover for VP	023567
Judge Snow's Final Vote	023568-023572
Judge Snow's SOS Folder	023573
Letter from SOS to Judge Snow	023574-023575
<b>ROBERT SINNERS</b>	
Robert Sinners Interview 5-6-24	023576
<b>GREG SAFSTEN #3</b>	
Verizon 23485124 CDR Alternative Records	
AttachedFax_10-11-2023_17-01-37	023576-023584
Certification of records NJ conformed copy sesig	023585
VISION.PR.254442.EAST.20231123Redacted DEC122020-...	023586-023599
VISION.PR.254442.EAST.20231123RedactedNOV03-DEC1...	023600-023638
Verizon 23485124 Records	
ActDeact__MTN-4807109266_2020-11-03_to_2021-01-07.798	023639
AttachedFax_10-11-2023_17-01-37	023640-023647
Certification of records NJ conformed copy sesig	023648

DeviceId__MTN-4807109266_2020-11-03_to_2021-01-07.216	023649
Features__4807109266_2020-11-03_to_2021-01-07.466	023650-023651
OwnerEmail__4807109266_2020-11-03_to_2021-01-07.013	023652
Payment_Codes	023653
PaymentActivity__MTN-4807109266_2020-11-03_to_2021-...	023654
PaymentHistory__MTN-4807109266_2020-11-03_to_2021-...	023655
SSN__MTN-4807109266_2020-11-03_to_2021-01-07.152.x...	023656
Subscriber__MTN-4807109266_2020-11-03_to_2021-01-07...	023657

**DANIEL SCARPINATO**

Daniel Scarpinato Interview 4-15-24	023658
-------------------------------------	--------

**ROBERT SINNERS #3**

Robert Sinners J6 Interview 6-15-22	023659-023714
Roman to Sinners etc emails 12-14-20	023715-023716
Sinners to GA fake elector email	023717

**VICTORIA STEVENS**

Victoria Stevens Interview 4-12-24	023718
------------------------------------	--------

**REPORTS #2**

SIS Supplement 23 (Rusty Bowers Interview)	023719-023726
SIS Supplement 24 (Victoria Stevens Interview)	023727-023729
SIS Supplement 25 (Evidence Item #1)	023730-023731
SIS Supplement 29 (Wilenchik ATT Results)	023732-023733
SIS Supplement 30 (Robert Sinners Interview)	023734-023737
SIS Supplement 31 (Mark Meadows Subpoena)	023738-023740
SIS Supplement 32 (Justin Clark Subpoena)	023741-023743
SIS Supplement 33 (Thoughtspan Error)	023744-023746
SIS Supplement 34 (Evidence Item #3)	023747-023749
SIS Supplement 35 (Six Subpoenas)	023750-023752
SIS Supplement 36 (SWs for X Accounts)	023753-023755
SIS Supplement 37 (Josh Findlay Subpoena)	023756-023758
SIS Supplement 38 (Cassidy Hutchinson Interview)	023759-023767
SIS Supplement 40 (Pellegrino Email Return)	023768-023769
SIS Supplement 41 (Doug Ducey Interview)	023770-023777
SIS Supplement 42 (Boris Epshteyn Subpoena)	023778-023780
SIS Supplement 43 (John Eastman Subpoena)	023781-023783
SIS Supplement 44 (Jenna Ellis Subpoena)	023784-023786
SIS Supplement 45 (8 Electors Subpoenas)	023787-023789
SIS Supplement 46 (Christina Bobb Subpoena)	023790-023792
SIS Supplement 47 (Mark Meadows Subpoena)	023793-023795
SIS Supplement 48 (Robert Sinners Interview)	023796-023807

SIS Supplement 49 (William Stepien Interview)	023808-023812
SIS Supplement 50 (Daniel Scarpinato Interview)	023813-023816
SIS Supplement 51 (Vince Leach Interview)	023817-023819
SIS Supplement 52 (Rudy Giuliani Subpoena)	023820-023821
SIS Supplement 53 (Jake Hoffman Subpoena)	023822-023823

13. *State's Request for Disclosure*

The State requests all disclosure required under Arizona Rule of Criminal Procedure 15.2(a)(1)(A)(H) and (e)(7)(A)-(B).

14. *Continuing Disclosure*

The State will continue to disclose evidence and/or witnesses it plans to use at the trial in this matter, as required pursuant to Rule 15.6.

RESPECTFULLY SUBMITTED this 21st day of May, 2024.

KRISTIN K. MAYES  
Attorney General

/s/Nicholas Klingerman  
NICHOLAS KLINGERMAN  
Assistant Attorney General

Original of the foregoing e-filed this  
21st day of May, 2024, via:

Maricopa County Superior Court  
[efilingonline.clerkofcourt.maricopa.gov](http://efilingonline.clerkofcourt.maricopa.gov)

A copy of the foregoing document  
emailed, with attachments made available  
via the AG fileshare server, this 21st  
day of May, 2024, to:

Brad Miller  
[Office@BradLMiller.com](mailto:Office@BradLMiller.com)  
*Counsel for K. Ward 001*

John Dosedall  
[criminaldocket@jacksonwhitelaw.com](mailto:criminaldocket@jacksonwhitelaw.com)  
*Counsel for N. Cottle 003*

Roger Contreras  
[rcontreras@cochise.az.gov](mailto:rcontreras@cochise.az.gov)  
*Counsel for R. Montgomery 007*

Joshua S. Kolsrud  
[josh@kolsrudlawoffices.com](mailto:josh@kolsrudlawoffices.com)  
*Counsel for L. Pellegrino 009*

Brad Miller  
[Office@BradLMiller.com](mailto:Office@BradLMiller.com)  
*Counsel for M. Ward 011*

Ashley Adams  
[aadams@azwhitecollarcrime.com](mailto:aadams@azwhitecollarcrime.com)  
*Counsel for J. Eastman 013*

Andrew Pacheco  
[apacheco@rrulaw.com](mailto:apacheco@rrulaw.com)  
*Counsel for T. Bowyer 002*

Andrew Marcantel  
[Andy@AttorneysForFreedom.com](mailto:Andy@AttorneysForFreedom.com)  
*Counsel for A. Kern 005*

Jeffrey Cloud  
[jcloud@jcloudlaw.com](mailto:jcloud@jcloudlaw.com)  
*Counsel for S. Moorhead 008*

Richard Jones  
[Richard.Jones@Maricopa.gov](mailto:Richard.Jones@Maricopa.gov)  
*Counsel for G. Safsten 010*

Rudy Giuliani  
[truthandjustice4u@protonmail.com](mailto:truthandjustice4u@protonmail.com)  
*Pro Se Defendant 012*

Thomas Jacobs  
[tjacobs@jacobsArizonalaw.com](mailto:tjacobs@jacobsArizonalaw.com)  
*Counsel for C. Bobb 016*

PHX #12089859

SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY

CR2024-006850-016 DT

05/21/2024

HONORABLE SHELLIE SMITH

CLERK OF THE COURT  
A. Chee  
Deputy

STATE OF ARIZONA

NICHOLAS KLINGERMAN

v.

CHRISTINA BOBB (016)

THOMAS F JACOBS

COMM. SHELLIE SMITH  
JUDGE DANIEL MARTIN  
VICTIM WITNESS DIV-AG-CCC

NOT GUILTY ARRAIGNMENT

9:23 a.m.

Courtroom CCB 402

State's Attorney: Nicholas Klingerman and Krista Wood  
Defendant's Attorney: Thomas Jacobs  
Defendant: Present

A record of the proceedings is made digitally in lieu of a court reporter.

Defendant waives the advisement.

Defense counsel waives formal reading of the charge(s).

IT IS ORDERED entering a Not Guilty Plea to all charges on behalf of the Defendant at this time.

SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY

CR2024-006850-016 DT

05/21/2024

In preparation for the Initial Pretrial Conference (IPTC), the parties shall do the following:

1. The defense attorney shall conduct a conflicts check within the office to determine whether a conflict exists. If a conflict exists, counsel shall staff the conflict with the appropriate supervisor, and counsel shall file the appropriate Motion to Withdraw so new counsel can appear at the Initial Pretrial Conference.

2. Motions to Modify Release Conditions shall be heard at the Initial Pretrial Conference. Motions shall be filed with the assigned Commissioner not later than 10 days prior to the Initial Pretrial Conference.

3. If a plea agreement is extended by the State, the State shall extend the plea not later than 10 days before the Initial Pretrial Conference. Defense Counsel shall make reasonable efforts to present the plea to in custody defendants before the Initial Pretrial Conference.

4. Motion for Rule 11 Evaluations shall be heard at the Initial Pretrial Conference. Motions shall be filed with the assigned Commissioner not less than 10 days before the Initial Pretrial Conference.

5. Defense Counsel shall prepare and file a List of Specific Items of Discovery required under Rule 15.1 (b), but which were not disclosed. See Rule 15.2(e). Such list shall be filed with the assigned Commissioner not less than 5 days before the Initial Pretrial Conference.

6. All electronic media (audio tapes, CD's, etc.) or documents which require language translation shall be submitted to the Court Interpretation and Translation Department (CITS) on or before the IPTC hearing date.

7. The Initial Pretrial Statement shall be filed with the assigned Commissioner not less than 3 days before the Initial Pretrial Conference hearing date.

**ANY MOTION TO MODIFY RELEASE CONDITIONS, OR RULE 11 MOTIONS NOT FILED BEFORE THE INITIAL PRETRIAL CONFERENCE WILL BE HEARD AT THE COMPREHENSIVE PRETRIAL CONFERENCE BEFORE THE DESIGNATED MASTER CALENDAR JUDICIAL OFFICER. ALL MOTIONS SHALL BE IN WRITING WITH SPECIFIC FACTS TO SUPPORT THE MOTIONS.**

This case is assigned to Judge Martin.

SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY

CR2024-006850-016 DT

05/21/2024

IT IS FURTHER ORDERED setting an Initial Pretrial Conference for 7/2/2024 at 8:15 a.m. before Commissioner Henderson.

IT IS ORDERED setting a Comprehensive Pretrial Conference for 8/1/2024 at 8:30 AM before Judge Martin.

As to Count(s) 1-9, for which the Court conducts an Initial Appearance this date,

IT IS ORDERED releasing the Defendant on his/her own recognizance with permission to continue to reside out of state.

Defendant having failed to provide proof of ten-print fingerprints in accordance with A.R.S. § 41-1750,

IT IS ORDERED that Defendant report to the Maricopa County Sheriff's Office for ten-print fingerprinting within twenty days of today.

IT IS ORDERED that the attorneys for both the State and Defense be prepared to provide the court with the following information at the Comprehensive Pretrial Conference (CPTC):

A. The status of plea negotiations. This includes whether or not the State has tendered an offer; if so, when it expires; the results of the settlement conference; and whether or not a Donald advisement is required.

B. The status of disclosure by both the State and Defense. This includes what discovery has been disclosed and what discovery still needs to be disclosed. If any discovery is left undisclosed, it is required that all parties comply with Rule 15.6 and provide appropriate affidavits.

C. The number of days required for trial.

D. The number of witnesses to be used at trial, including any out-of-town witnesses. And the number of expert witnesses to be used at trial.

E. The status of interviews. This includes how many interviews have been conducted and how many are left to complete. This includes whether or not any depositions are going to be required. If depositions are required, it is ordered that the party file a motion requesting same no later than two days before the CPTC date.

SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY

CR2024-006850-016 DT

05/21/2024

- F. Whether or not an interpreter is going to be required for either a witness or the defendant or both.
- G. The number of jurors required for trial along with the recommended number of alternates.
- H. Whether or not the State is requesting an aggravating factors trial to the jury.
- I. Any special jury instructions.
- J. Whether or not either party is requesting a lesser-included offense.
- K. Whether or not there are any anticipated substantive motions to be filed by either party.
- L. Whether or not there are any motions in limine anticipated.

IT IS FURTHER ORDERED setting a Final Trial Management Conference (FTMC) on 10/10/2024 at 8:30 AM before Judge Martin.

IT IS ORDERED setting the Trial Assignment date on 10/17/2024 at 9:00 a.m. before the Master Calendar Assignment Judge. The Trial Assignment hearing is in person for all lawyers and defendants. The parties should contact the Trial Assignment division prior to the Trial Assignment date to request to appear virtually. The purpose of the hearing is to set dates for (1) the Trial Procedure Conference and (2) the jury selection date.

All self-represented litigants shall appear in person at the trial assignment date unless otherwise ordered. All in custody defendants shall be transported unless otherwise ordered.

Should the Trial Assignment Judge approve a virtual appearance, the Assignment Judge's division will email parties instructions and a link to join the Court Connect videoconference (for more information, visit <https://superiorcourt.maricopa.gov/court-connect/>). A hearing participant can also join by telephone by dialing 917-781-4590 and entering Access Code 103 815 458#. If a virtual appearance has been approved counsel of record and defendants are ordered to appear via videoconference with their webcams enabled.

IT IS ORDERED that the Defendant shall contact and meet with his/her attorney in person no later than three weeks from this date, for the purpose of preparing for the Initial Pretrial Conference.

SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY

CR2024-006850-016 DT

05/21/2024

NOTICE TO DEFENDANTS:

Failure to comply with the above orders may result in revocation of Defendant's release from custody and/or the imposition of other sanctions.

The Defendant may be tried in his/her absence if he/she fails to appear for trial.

The Defendant is advised that, if convicted, the Defendant will be required to appear for sentencing. If the Defendant chooses not to appear, and the Defendant's absence prevents the Defendant from being sentenced within ninety days from the conviction, the Defendant may lose the right to a direct appeal.

LAST DAY: 11/17/2024.

Defendant is directed to appear at all scheduled court hearings and advised of the potential consequences should he/she fail to appear.

9:26 a.m. Matter concludes.

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

24 MAY 29 PM 5:00

CLERK OF THE  
SUPERIOR COURT  
FILED  
A HIGUERA.DLP

PROCEEDINGS BEFORE THE 93rd )  
ARIZONA STATE GRAND JURY ) STATE GRAND JURY  
IN RE: ) 93rd SGJ 81  
----- ) CR 2024-006850-016  
 ) VENUE: MARICOPA COUNTY  
Defendant. )  
----- )

Phoenix, Arizona

January 16, 2024

**REPORTER'S TRANSCRIPT OF PROCEEDINGS**  
**STATE GRAND JURY PROCEEDINGS**

Lisa A. Bradley, CSR #9938, RPR  
Certified Reporter  
Certificate No. 50442

(ORIGINAL)

SGJ



IN THE SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY  
Final Release Order

Clerk of the Superior Court  
\*\*\* Electronically Filed \*\*\*  
COC Auto-Accept  
5/21/2024 9:41:00 AM  
Filing ID 17853817

State of Arizona

CaseNumber: **CR2024-006850-016**

6 Cnt 13-2002A FORGERY F4N

1 Cnt 13-1003 CONSPIRACY F2N

vs.

1 Cnt 13-2310A FRAUDULENT SCHE F2N

1 Cnt 13-2311 FRAUD SCHEME/PR F5N

**Christina Bobb**

It is hereby ordered that **Christina Bobb shall be released** as indicated and must comply with ALL release conditions.

**NEXT HEARING (S)**

**Initial Pretrial Conference** July 02, 2024 at 08:15 AM at South Court Tower, 175 W. Madison Street, 6th Floor, Phoenix, AZ, 85003-2243 Courtroom: 6D **Docket: CMC05**

**Comprehensive PreTrial Conference** August 01, 2024 at 08:31 AM at South Court Tower, 175 W. Madison Street, 5th Floor, Phoenix, AZ 85003-2243 Courtroom: 5C **Docket: CRJ07**

**Pre-Trial Conference** October 10, 2024 at 08:30 AM at South Court Tower, 175 W. Madison Street, 5th Floor, Phoenix, AZ, 85003-2243 Courtroom: 5C **Docket: CRJ07**

**Trial** October 17, 2024 at 09:00 AM at South Court Tower, 175 W. Madison Street, 5th Floor, Phoenix, AZ, 85003-2243 Courtroom: 5B **Docket: CPJ03**

**RELEASE TYPE**

**Bailable As a Matter of Right**

The defendant has been found to be bailable as a matter of right. IT IS HEREBY ORDERED that the defendant must comply with all release conditions and shall be released from custody in this Cause Number as follows:

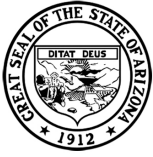
**Own Recognizance**

The defendant is released without any condition of an undertaking relating to, or deposit of security, and promises to appear in Court as required.

You must return to the police department that arrested you and have them 10-Print fingerprint you. If you are released from custody you must complete this before your next hearing. You must bring proof of your fingerprinting to your next hearing or your release may be revoked.

**RELEASE CONDITIONS**

1. You are not to have any physical contact with any alleged victim.
2. You are not to have any contact with any co-defendant.
3. You must continue to provide the court with proof of your local address.
4. You must return to the police department that arrested you and have them 10-Print fingerprint you. If you are released from custody you must complete this before your next hearing. You must bring proof of your fingerprinting to your next hearing or your release may be revoked.
5. You must continue to reside at your present local address.



IN THE SUPERIOR COURT OF ARIZONA

MARICOPA COUNTY

Final Release Order

Case#: CR2024-006850-016

You must appear at all court proceedings in this case or your release conditions can be revoked, a warrant will be issued and proceedings may go forward in your absence. You must maintain contact with your attorney. If convicted, you will be required to appear for Sentencing. If you fail to appear, you may lose your right to a direct appeal. In addition, failure to appear at a future court proceeding may result in a waiver of any claim that you were not informed of a plea offer made in your case by the State. **a.** You will appear to answer and submit to all further orders and processes of the court having jurisdiction of the case. **b.** You will refrain from committing any criminal offenses. **c.** You will diligently prosecute any appeal. **d.** You will not leave the state without permission of the court. If you violate any conditions of this release order, the court may order the bond and any security deposited in connection therewith forfeited to the State of Arizona. In addition, the court may issue a warrant for your arrest upon learning of your violation of any conditions of your release. After a hearing, if the court finds that you have not complied with the conditions of release, it may modify the conditions or revoke your release altogether.

If you are released on a felony charge, and the court finds the proof evident or the presumption great that you committed a felony during the period of release, the court must revoke your release. You may also be subject to an additional criminal charge, and upon conviction you could be punished by imprisonment in addition to the punishment which would otherwise be imposable for the crime committed during the period of release. Upon finding that you violated conditions of release, the court may also find you in contempt of court and sentence you to a term of imprisonment, a fine, or both.

ACKNOWLEDGEMENT BY DEFENDANT

I have received a copy of this order. I understand the standard conditions, all other conditions and the consequences of violating this release order. I agree to comply fully with each of the conditions imposed in this release order, and to promptly notify the court in the event I change my place of residence.

Date 5/21/2024 9:27 AM

Address:

City, State, Zip:

Signature:

**Shellie Smith**

Judge / Commissioner

**Christina Bobb**

Defendant

**LAW OFFICES OF THOMAS JACOBS**  
**271 North Stone Avenue**  
**Tucson, Arizona 85701**  
**PHN: (520) 628-1622**  
**FAX: (520) 628-4534**

Thomas Jacobs, Esq.  
State Bar No. 013275  
P.C.C. No. 64489  
tjacobs@jacobsazlaw.com  
Attorney for: CHRISTINA BOBB.

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

<b>STATE OF ARIZONA,</b>	)	
	)	No. CR2024-006850-016
Plaintiff,	)	
	)	<b>MOTION FOR LEAVE TO</b>
vs.	)	<b>COMPLETE PHOTO AND</b>
	)	<b>FINGERPRINT PROCESSING</b>
<b>CHRISTINA BOBB (016),</b>	)	<b>AFTER ARRAIGNMENT</b>
	)	
Defendant.	)	Assigned to:
	)	Comm. Shellie Smith
_____	)	

Defendant, CHRISTINA BOBB (016), requests leave of court allowing her to complete the required photo and fingerprinting process at the Maricopa County Sheriff's Office, Records and Identification Division, by May 31, 2024, rather than prior to the May 21, 2024, Initial Appearance/Arraignment Hearing.

Ms. Bobb accepted service of the Summons and Indictment on or about May 7, 2024, and has requested leave to appear virtually due to existing travel plans and her out of state residence. The State has indicated that it has no objection to that

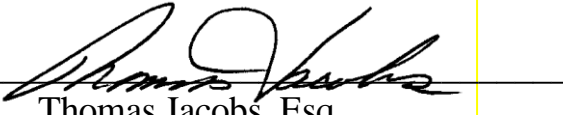
process. See *Motion for Leave to Appear Virtually At Initial Appearance & Arraignment (5/8/24)*. Ms. Bobb expects to be in the State of Arizona before May 31, 2024, and can complete the intake process on or before that date.

The State, through its attorney Krista Wood, has indicated that it has no objection to this request.

RESPECTFULLY SUBMITTED this 8<sup>th</sup> day of May 2024.

**LAW OFFICES OF THOMAS JACOBS**

By



Thomas Jacobs, Esq.

Attorney for Defendant Christina Bobb

Copy of the foregoing electronically delivered this 8<sup>th</sup> day of May, 2024, to:

Hon. Commissioner Shellie Smith  
Maricopa County Superior Court  
Phoenix, AZ 85003  
Andrew.Baiza@JBAZMC.Maricopa.Gov

Nicolas Klingerman  
Krista Wood  
Arizona Attorney Generals Office  
Phoenix, AZ 85004  
[Nicolas.Klingerman@azag.gov](mailto:Nicolas.Klingerman@azag.gov)  
[Krista.Wood@azag.gov](mailto:Krista.Wood@azag.gov)  
Attorney for State of Arizona

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

<b>STATE OF ARIZONA,</b>	)	
	)	No. CR2024-006850-016
Plaintiff,	)	
	)	
vs.	)	<b>ORDER</b>
	)	
<b>CHRISTINA BOBB (016),</b>	)	
	)	Assigned to:
Defendant.	)	Comm. Shellie Smith
_____	)	

Upon Motion of Defendant CHRISTINA BOBB (016), there being no objection and good cause appearing,

IT IS HEREBY ORDERED that the request for leave to complete photo and fingerprint processing at the Maricopa County Sheriff’s Office after Initial Appearance & Arraignment Hearing on May 21, 2024, at 8:30 a.m., is GRANTED. Ms. Bobb may complete that intake process on or before May 31, 2024.

DATED this \_\_\_\_\_ day of May 2024.

By \_\_\_\_\_  
Hon. Shellie Smith  
Commissioner, Maricopa County Superior  
Court

24 APR 23 PM 12:00

KRISTIN K MAYES  
Attorney General  
Firm Bar No. 14000

NICHOLAS KLINGERMANN  
State Bar No. 028231  
Assistant Attorney General  
2005 N. Central Avenue  
Phoenix, Arizona 85004  
Telephone 602-542-3881  
crmfraud@azag.gov

Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.

**KELLI WARD (001),**  
*Counts 1-9*

**TYLER BOWYER (002),**  
*Counts 1-9*

**NANCY COTTLE (003),**  
*Counts 1-9*

**JACOB HOFFMAN (004),**  
*Counts 1-9*

**ANTHONY KERN (005),**  
*Counts 1-9*

Case No: **CR 2024 - 006850 - 016**

93 SGJ 81

**INDICTMENT**

**CHARGING VIOLATIONS OF:**

**COUNT 1: CONSPIRACY**, a Class 2 Felony,  
in violation of A.R.S. § 13-1003

**COUNT 2: FRAUDULENT SCHEMES AND  
ARTIFICES**, a Class 2 Felony, in violation  
of A.R.S. §13-2310(A)

**COUNT 3: FRAUDULENT SCHEMES AND  
PRACTICES**, a Class 5 Felony, in violation  
of A.R.S. § 13-2311

**JAMES LAMON (006),**  
*Counts 1-9*

**ROBERT MONTGOMERY (007),**  
*Counts 1-9*

**SAMUEL MOORHEAD (008),**  
*Counts 1-9*

**LORRAINE PELLEGRINO (009),**  
*Counts 1-9*

**GREGORY SAFSTEN (010),**  
*Counts 1-9*

**MICHAEL WARD (011),**  
*Counts 1-9*

**(012),**  
*Counts 1-9*

**JOHN EASTMAN (013),**  
*Counts 1-9*

**BORIS EPSHTEYN (014),**  
*Counts 1-9*

**JENNA ELLIS (015),**  
*Counts 1-9*

X **CHRISTINA BOBB (016),**  
*Counts 1-9*

**MICHAEL ROMAN (017),**  
*Counts 1-9*

**COUNTS 4-9: FORGERY, Class 4 Felonies,**  
in violation of A.R.S. § 13-2002(A)

**MARK MEADOWS (018),**  
*Counts 1-9*

Defendants.

The 93rd State Grand Jury accuses **KELLI WARD (001), TYLER BOWYER (002), NANCY COTTLE (003), JACOB HOFFMAN (004), ANTHONY KERN (005), JAMES LAMON (006), ROBERT MONTGOMERY (007), SAMUEL MOORHEAD (008), LORRAINE PELLEGRINO (009), GREGORY SAFSTEN (010), MICHAEL WARD (011), (012), JOHN EASTMAN (013), BORIS EPSHTEYN (014), JENNA ELLIS (015), CHRISTINA BOBB (016), MICHAEL ROMAN (017), and MARK MEADOWS (018)**, charging on this 23rd day of April, 2024, that in or from Maricopa County, Arizona:

**I. CHARGES.**

**COUNT 1**  
**CONSPIRACY, A CLASS TWO FELONY**

From on or about November 3, 2020 and continuing through on or about January 6, 2021, **KELLI WARD (001), TYLER BOWYER (002), NANCY COTTLE (003), JACOB HOFFMAN (004), ANTHONY KERN (005), JAMES LAMON (006), ROBERT MONTGOMERY (007), SAMUEL MOORHEAD (008), LORRAINE PELLEGRINO (009), GREGORY SAFSTEN (010), MICHAEL WARD (011), (012),**

**JOHN EASTMAN (013), BORIS EPSHTEYN (014), JENNA ELLIS (015), CHRISTINA BOBB (016), MICHAEL ROMAN (017), and MARK MEADOWS (018),** with the intent to promote or aid in the commission of an offense, agreed with one and/or more persons **KNOWN** and/or **UNKNOWN**, that at least one of them or another person would engage in conduct constituting one or more of the following offenses, in particular:

- 1) **FRAUDULENT SCHEMES AND ARTIFICES**, in violation of A.R.S. § 13-2310(A);
- 2) **FRAUDULENT SCHEMES AND PRACTICES**, in violation of A.R.S. § 13-2311(A),
- 3) **FORGERY**, in violation of A.R.S. § 13-2002(A)(1) & (A)(3);
- 4) **CHANGING VOTE OF ELECTOR BY CORRUPT MEANS OR INDUCEMENT**, in violation of A.R.S. § 16-1006(A)(3);
- 5) **TAMPERING WITH A PUBLIC RECORD**, in violation A.R.S. § 13-2407(A)(3);
- 6) **PRESENTMENT OF FALSE INSTRUMENT FOR FILING**, in violation of A.R.S. § 39-161.

In furtherance of this conspiracy and to effect the foregoing objects thereof, **KELLI WARD (001), TYLER BOWYER (002), NANCY COTTLE (003), JACOB HOFFMAN (004), ANTHONY KERN (005), JAMES LAMON (006), ROBERT MONTGOMERY (007), SAMUEL MOORHEAD (008), LORRAINE PELLEGRINO (009),**

**GREGORY SAFSTEN (010), MICHAEL WARD (011), (012), JOHN EASTMAN (013), BORIS EPSHTEYN (014), JENNA ELLIS (015), CHRISTINA BOBB (016), MICHAEL ROMAN (017), and MARK MEADOWS (018), and their co-conspirators did commit one or more of the following overt acts, including but not limited to. the overt acts described in Counts 2 through 9, and Section II of this Indictment (which is incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-2310(A)(1), 13-2311(A), 13-2002(A)(1) & (A)(3), 16-1006(A)(3), 13-2407(A)(3), 39-161, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314**

**COUNT 2**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS TWO FELONY**

From on or about November 3, 2020 and continuing through on or about January 6, 2021, **KELLI WARD (001), TYLER BOWYER (002), NANCY COTTLE (003), JACOB HOFFMAN (004), ANTHONY KERN (005), JAMES LAMON (006), ROBERT MONTGOMERY (007), SAMUEL MOORHEAD (008), LORRAINE PELLEGRINO (009), GREGORY SAFSTEN (010), MICHAEL WARD (011), (012), JOHN EASTMAN (013), BORIS EPSHTEYN (014), JENNA ELLIS (015), CHRISTINA BOBB (016), MICHAEL ROMAN (017), and MARK MEADOWS (018), pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false**

or fraudulent pretenses, representations, promises, or material omissions, to wit: preventing the lawful transfer of the presidency of the United States, keeping President Donald J. Trump in office against the will of Arizona voters, and depriving Arizona voters of their right to vote and have their votes counted under the United States Constitution, Arizona Constitution Article 7, and Arizona Revised Statutes, Title 16, by means involving, but not limited to, the acts described in Section II, in violation of A.R.S. §§ 13-2310(A), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT 3**  
**FRAUDULENT SCHEMES AND PRACTICES, A CLASS FIVE FELONY**

From on or about November 3, 2020 and continuing through on or about January 6, 2021, in a matter related to the business conducted by any department or agency of this state or any political subdivision thereof, **KELLI WARD (001), TYLER BOWYER (002), NANCY COTTLE (003), JACOB HOFFMAN (004), ANTHONY KERN (005), JAMES LAMON (006), ROBERT MONTGOMERY (007), SAMUEL MOORHEAD (008), LORRAINE PELLEGRINO (009), GREGORY SAFSTEN (010), MICHAEL WARD (011), [012), JOHN EASTMAN (013), BORIS EPSHTEYN (014), JENNA ELLIS (015), CHRISTINA BOBB (016), MICHAEL ROMAN (017), and MARK MEADOWS (018)**, pursuant to a scheme or artifice to defraud or

deceive, knowingly falsified, concealed or covered up a material fact by any trick, scheme or device or made or used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement or entry, to wit: two certificates of votes for President Donald J. Trump and Vice President Michael Pence, filed by the Arizona Republican electors with the Arizona Secretary of State, involving, but not limited to, the acts described in Section II, in violation of A.R.S. §§ 13-2311(A), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT 4**  
**FORGERY, A CLASS FOUR FELONY**

From on or about November 3, 2020 and continuing through on or about January 6, 2021, with intent to defraud, **KELLI WARD (001), TYLER BOWYER (002), NANCY COTTLE (003), JACOB HOFFMAN (004), ANTHONY KERN (005), JAMES LAMON (006), ROBERT MONTGOMERY (007), SAMUEL MOORHEAD (008), LORRAINE PELLEGRINO (009), GREGORY SAFSTEN (010), MICHAEL WARD (011), (012), JOHN EASTMAN (013), BORIS EPSHTEYN (014), JENNA ELLIS (015), CHRISTINA BOBB (016), MICHAEL ROMAN (017), and MARK MEADOWS (018)** falsely made, completed or altered a written instrument and/or offered or presented, whether accepted or not, a forged instrument or one that

contained false information, to wit: a certificate of votes for President Donald J. Trump and Vice President Michael Pence, filed by the Arizona Republican electors with the President of the United States Senate, involving, but not limited to, the acts described in Section II, in violation of A.R.S. §§ 13-2002(A)(1) & (A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT 5**  
**FORGERY, A CLASS FOUR FELONY**

From on or about November 3, 2020 and continuing through on or about January 6, 2021, with intent to defraud, **KELLI WARD (001), TYLER BOWYER (002), NANCY COTTLE (003), JACOB HOFFMAN (004), ANTHONY KERN (005), JAMES LAMON (006), ROBERT MONTGOMERY (007), SAMUEL MOORHEAD (008), LORRAINE PELLEGRINO (009), GREGORY SAFSTEN (010), MICHAEL WARD (011), (012), JOHN EASTMAN (013), BORIS EPSHTEYN (014), JENNA ELLIS (015), CHRISTINA BOBB (016), MICHAEL ROMAN (017), and MARK MEADOWS (018)**, falsely made, completed or altered a written instrument and/or offered or presented, whether accepted or not, a forged instrument or one that contained false information, to wit: one of two certificates of votes for President Donald J. Trump and Vice President Michael Pence, filed by the Arizona

Republican electors with the Arizona Secretary of State, involving, but not limited to, the acts described in Section II, in violation of A.R.S. §§ 13-2002(A)(1) & (A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT 6**  
**FORGERY, A CLASS FOUR FELONY**

From on or about November 3, 2020 and continuing through on or about January 6, 2021, with intent to defraud, **KELLI WARD (001), TYLER BOWYER (002), NANCY COTTLE (003), JACOB HOFFMAN (004), ANTHONY KERN (005), JAMES LAMON (006), ROBERT MONTGOMERY (007), SAMUEL MOORHEAD (008), LORRAINE PELLEGRINO (009), GREGORY SAFSTEN (010), MICHAEL WARD (011), (012), JOHN EASTMAN (013), BORIS EPSHTEYN (014), JENNA ELLIS (015), CHRISTINA BOBB (016), MICHAEL ROMAN (017), and MARK MEADOWS (018)**, falsely made, completed or altered a written instrument and/or offered or presented, whether accepted or not, a forged instrument or one that contained false information, to wit: the second of two certificates of votes for President Donald J. Trump and Vice President Michael Pence, filed by the Arizona Republican electors with the Arizona Secretary of State, involving, but not limited to, the acts described in Section II, in violation of A R S. §§ 13-2002(A)(1) & (A)(3),

13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT 7**  
**FORGERY, A CLASS FOUR FELONY**

From on or about November 3, 2020 and continuing through on or about January 6, 2021, with intent to defraud, **KELLI WARD (001), TYLER BOWYER (002), NANCY COTTLE (003), JACOB HOFFMAN (004), ANTHONY KERN (005), JAMES LAMON (006), ROBERT MONTGOMERY (007), SAMUEL MOORHEAD (008), LORRAINE PELLEGRINO (009), GREGORY SAFSTEN (010), MICHAEL WARD (011), (012), JOHN EASTMAN (013), BORIS EPSHTEYN (014), JENNA ELLIS (015), CHRISTINA BOBB (016), MICHAEL ROMAN (017), and MARK MEADOWS (018)**, falsely made, completed or altered a written instrument and/or offered or presented, whether accepted or not, a forged instrument or one that contained false information, to wit: one of two certificates of votes for President Donald J. Trump and Vice President Michael Pence, filed by the Arizona Republican electors with the Archivist of the United States, involving, but not limited to, the acts described in Section II, in violation of A.R.S. §§ 13-2002(A)(1) & (A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT 8**  
**FORGERY, A CLASS FOUR FELONY**

From on or about November 3, 2020 and continuing through on or about January 6, 2021, with intent to defraud, **KELLI WARD (001), TYLER BOWYER (002), NANCY COTTLE (003), JACOB HOFFMAN (004), ANTHONY KERN (005), JAMES LAMON (006), ROBERT MONTGOMERY (007), SAMUEL MOORHEAD (008), LORRAINE PELLEGRINO (009), GREGORY SAFSTEN (010), MICHAEL WARD (011), (012), JOHN EASTMAN (013), BORIS EPSHTEYN (014), JENNA ELLIS (015), CHRISTINA BOBB (016), MICHAEL ROMAN (017), and MARK MEADOWS (018)**, falsely made, completed or altered a written instrument and/or offered or presented, whether accepted or not, a forged instrument or one that contained false information, to wit: the second of two certificates of votes for President Donald J. Trump and Vice President Michael Pence, filed by the Arizona Republican electors with the Archivist of the United States, involving, but not limited to, the acts described in Section II, in violation of A.R.S. §§ 13-2002(A)(1) & (A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT 9**  
**FORGERY, A CLASS FOUR FELONY**

From on or about November 3, 2020 and continuing through on or about January 6, 2021, with intent to defraud, **KELLI WARD (001), TYLER BOWYER (002), NANCY COTTLE (003), JACOB HOFFMAN (004), ANTHONY KERN (005), JAMES LAMON (006), ROBERT MONTGOMERY (007), SAMUEL MOORHEAD (008), LORRAINE PELLEGRINO (009), GREGORY SAFSTEN (010), MICHAEL WARD (011), (012), JOHN EASTMAN (013), BORIS EPSHTEYN (014), JENNA ELLIS (015), CHRISTINA BOBB (016), MICHAEL ROMAN (017), and MARK MEADOWS (018)**, falsely made, completed or altered a written instrument and/or offered or presented, whether accepted or not, a forged instrument or one that contained false information, to wit: a certificate of votes for President Donald J. Trump and Vice President Michael Pence, filed by the Arizona Republican electors with the Chief Judge of the Federal District Court for the District of Arizona, involving, but not limited to, the acts described in Section II, in violation of A.R.S. §§ 13-2002(A)(1) & (A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314

## **II. THE CONSPIRACY AND SCHEME.**

In Arizona, and the United States, the people elected Joseph Biden as President on November 3, 2020. Unwilling to accept this fact, Defendants and unindicted coconspirators schemed to prevent the lawful transfer of the presidency to keep **Unindicted Coconspirator 1** in office against the will of Arizona's voters. This scheme would have deprived Arizona voters of their right to vote and have their votes counted.

After the general election on November 3, 2020, Defendants raised false claims of widespread election fraud in Arizona to pressure election officials to change the outcome of a democratic election. Those efforts failed when the Maricopa County Board of Supervisors, Secretary of State, and Governor certified Arizona's election. Republican Presidential Elector Defendants then voted for President Donald Trump and Vice President Michael Pence on December 14, 2020, falsely claiming to be the "duly elected and qualified Electors for President and Vice President of the United States from the State of Arizona."

Defendants deceived the citizens of Arizona by falsely claiming that those votes were contingent only on a legal challenge that would change the outcome of the election. In reality, Defendants intended that their false votes for Trump-Pence would encourage Pence to reject the Biden-Harris votes on January 6,

2021, regardless of the outcome of the legal challenge. When combined with the six other States where Republican electors sent in uncertified votes for Trump-Pence, Defendants wanted Pence to either declare **Unindicted Coconspirator 1** the winner of the election, delay the proceeding and have individual state legislatures determine their electors, or have Congress resolve any claimed uncertainty about the validity of election results in Arizona and six other states in **Unindicted Coconspirator 1's** favor. The scheme failed when Vice President Michael Pence accepted all certified Biden-Harris votes on January 6, 2021.

#### **A. Background on Presidential Election Procedures.**

Defendants deceived the public by arguing the scheme to have Republican electors vote for Trump-Pence in Arizona and six other states was legal. Thus, background on presidential election laws is necessary to understand the scheme.

Presidential elections happen on the first Tuesday of November, following the first Monday, every four years. In 2020, the Presidential Election fell on November 3, 2020. **Unindicted Coconspirator 1** ran for reelection with then-Vice President Pence against now-President Biden and now-Vice President Harris.

The popular vote does not determine the President. Instead, the Constitution of the United States provides that "Electors" select the President and Vice President of the United States. This system is known as the Electoral College.

In the Electoral College, each state and the District of Columbia determines how Presidential Electors are selected, and each state's Presidential Electors equals the number of that state's congressional delegation. With the exception of Maine and Nebraska, all states award their entire allotment of Presidential Electors to the person who won the popular vote in that state. A simple majority of Presidential Electors then selects the President and Vice President. There are 538 electors, so it takes 270 votes to win.

The Electoral Count Act of 1887 (ECA), which was in place in 2020, provides the procedure for selecting the President and Vice President in the Electoral College. The ECA first required that each state determine the Presidential Electors at least six days before the electors' vote. The determination is called a "certificate of ascertainment" and must be issued by the executive officer of each state

Under the ECA, each state's Presidential Electors meet and vote "on the first Monday after the second Wednesday in December " In 2020, the electors met and voted on December 14. This also meant the last date for the certificate of ascertainment was December 8, 2020. The electors must send the certificates of their votes, along with the certificate of ascertainment, as follows: one copy to the President of the Senate; two copies to the chief election officer of their state;

two copies to the Archivist of the United States; and one copy to the Chief Judge of the federal District Court where the electors assembled.

The ECA then provided that the Vice President, sitting as the President of the Senate, hold a joint session of Congress on January 6 following the election. At that joint session, the Vice President was directed to open the Presidential Elector votes in alphabetical order by state so the votes could be counted. After the votes are counted, the Vice President declares the next President and Vice President.

Arizona has nine congressional seats and two senators, so it has 11 votes in the Electoral College. Each political party selects its own Presidential Electors, and State law provides that Arizona's Presidential Electors are awarded based on the winner of the popular vote in Arizona. The law provides that Presidential Electors cannot vote for anyone other than the certified winner of the election. Arizona law first requires that counties count the votes in their respective counties following the election. Determining the vote count is called a canvass. Once complete, the county boards of supervisors must certify the canvass and report the results to the Secretary of State. The Secretary of State must then determine the statewide vote totals and certify the winner of all general elections on the "fourth Monday following the general election." In 2020, that date was November 30.

On November 30, the Arizona Secretary of State certified Biden-Harris as the winners of Arizona's popular vote. That same day, Governor Ducey issued a certificate of ascertainment, listing the Biden-Harris electors as Arizona's Presidential Electors. Accordingly, the Biden-Harris electors assembled, voted, and mailed their votes on December 14, 2020, consistent with the ECA.

### **B. Defendants – Arizona Fake Electors.**

In 2020, the following Defendants were selected as Arizona Republican Party Presidential Electors:

- **KELLI WARD (001).** **WARD (001)** was the chair of the Arizona Republican party. She organized the fake electors' vote on December 14, 2020, and voted for Trump-Pence as a fake elector, falsely stating that she was "duly elected and qualified." After voting, **WARD (001)** declared the Arizona Republican electors as the "true electors." She later urged Pence to accept false electoral votes for Trump-Pence on January 6, 2021. She did not withdraw her vote even though no legal challenge successfully changed the outcome of Arizona's 2020 Presidential Election.
- **TYLER BOWYER (002).** **BOWYER (002)** voted for Trump-Pence as a fake elector on December 14, 2020, falsely stating that he was "duly elected and qualified." After voting, **BOWYER (002)** made statements indicating that he intended to have Pence accept the false electoral votes for Trump-Pence on January 6, 2021. **BOWYER (002)** did not withdraw his vote even though no legal challenge successfully changed the outcome of Arizona's 2020 Presidential Election.
- **NANCY COTTLE (003).** **COTTLE (003)** was the chairperson of the Arizona Republican Presidential Electors. She voted for Trump-Pence as a fake elector on December 14, 2020, falsely stating that she was "duly elected

and qualified.” **COTTLE (003)** did not withdraw her vote even though no legal challenge successfully changed the outcome of Arizona’s 2020 Presidential Election.

- **JACOB HOFFMAN (004)**. **HOFFMAN (004)** was a representative-elect in the Arizona Legislature in November 2020. **HOFFMAN (004)** voted for Trump-Pence as a fake elector on December 14, 2020, falsely stating that he was “duly elected and qualified.” Following his vote as an Arizona Republican elector, **HOFFMAN (004)** urged Pence, in a letter dated January 5, 2020, to delay accepting Arizona’s certified Democrat elector votes on January 6, 2021, during the Joint Session of Congress in Washington D.C. **HOFFMAN (004)** did not withdraw his vote even though no legal challenge successfully changed the outcome of Arizona’s 2020 Presidential Election.
- **ANTHONY KERN (005)**. **KERN (005)** was a member of the Arizona Legislature who had lost his bid for reelection in the November 2020 election. **KERN (005)** voted for Trump-Pence as a fake elector on December 14, 2020, falsely stating that he was “duly elected and qualified ” Following December 14, 2020, **KERN (005)** continued to urge Arizona officials and Pence to accept the Arizona Republican electors’ votes on January 6, 2021. **KERN (005)** did not withdraw his vote even though no legal challenge successfully changed the outcome of Arizona’s 2020 Presidential Election.
- **JAMES LAMON (006)**. **LAMON (006)** voted for Trump-Pence as a fake elector on December 14, 2020, falsely stating that he was “duly elected and qualified.” **LAMON (006)** did not withdraw his vote even though no legal challenge successfully changed the outcome of Arizona’s 2020 Presidential Election.
- **ROBERT MONTGOMERY (007)**. **MONTGOMERY (007)** voted for Trump-Pence as a fake elector on December 14, 2020, falsely stating that he was “duly elected and qualified.” **MONTGOMERY (007)** did not withdraw his vote even though no legal challenge successfully changed the outcome of Arizona’s 2020 Presidential Election.
- **SAMUEL MOORHEAD (008)**. **MOORHEAD (008)** voted for Trump-Pence as a fake elector on December 14, 2020, falsely stating that he was “duly

elected and qualified ” **MOORHEAD (008)** did not withdraw his vote even though no legal challenge successfully changed the outcome of Arizona’s 2020 Presidential Election.

- **LORRAINE PELLEGRINO (009)**. **PELLEGRINO (009)** was the Secretary of the Arizona Republican fake presidential electors She voted for Trump-Pence as a fake elector on December 14, 2020, falsely stating that he was “duly elected and qualified.” **PELLEGRINO (009)** did not withdraw her vote even though no legal challenge successfully changed the outcome of Arizona’s 2020 Presidential Election.
- **GREGORY SAFSTEN (010)**. **SAFSTEN (010)** was the Executive Director of the Arizona Republican Party. He helped **KELLI WARD (001)** organize the fake electors’ vote on December 14, 2020, and voted for Trump-Pence as a fake elector, falsely stating that he was “duly elected and qualified.” **SAFSTEN (010)** did not withdraw his vote even though no legal challenge successfully changed the outcome of Arizona’s 2020 Presidential Election.
- **MICHAEL WARD (011)**. **WARD (011)** voted for Trump-Pence as a fake elector on December 14, 2020, falsely stating that he was “duly elected and qualified ” **WARD (011)** did not withdraw his vote even though no legal challenge successfully changed the outcome of Arizona’s 2020 Presidential Election.

### **C. Defendants.**

Defendants’ attempts to declare **Unindicted Coconspirator 1** and Pence the winners of the 2020 Presidential Election contrary to voter intent and the law, involved numerous other charged and uncharged coconspirators. The following is a brief summary of the remaining Defendants’ roles in the scheme to keep **Unindicted Coconspirator 1** in office against the will of Arizona voters:

- **(012)**. An attorney for **Unindicted Coconspirator 1** who was often identified as “the Mayor.” He spread false claims of election fraud in Arizona and nationally shortly after November 3, 2020. He presided over a “hearing” in downtown Phoenix on November 30, 2020, where he falsely claimed that Arizona’s election officials “have made no effort to find out” if the results of the recent presidential election were accurate. He pressured the Maricopa County Board of Supervisors and Arizona legislators to change the outcome of Arizona’s election, and he was responsible for encouraging Republican electors in Arizona and in six other contested states to vote for Trump-Pence on December 14, 2020.
- **JOHN EASTMAN (013)**. **EASTMAN (013)** was an attorney who encouraged the Republican electors to vote on December 14, 2020, and spread false claims of widespread election fraud. He also pressured the legislature in Arizona and six other states to change the outcome of the election. For example, on January 4, 2021, **EASTMAN (013)** pushed then-Arizona Speaker of the House Rusty Bowers to convene a Special Session to decertify Arizona’s presidential electors, telling him to “just do it and let the court sort it out.” Bowers declined to do so. Also on January 4, **EASTMAN (013)** met at the White House with **Unindicted Coconspirator 1**, Pence, and others to convince Pence to reject or at least delay the confirmation of the lawfully chosen electors two days later at the Joint Session of Congress.
- **BORIS EPSHTEYN (014)**. **EPSHTEYN (014)** was an attorney and was an advisor to the Trump Campaigns in 2016 and 2020. **EPSHTEYN (014)** assisted **(012)** in implementing the scheme to submit false Republican electors’ votes for Trump-Pence in Arizona and to obstruct the certification process during the January 6, 2021, Joint Session of Congress in Washington D.C.
- **JENNA ELLIS (015)**. **ELLIS (015)** was an attorney for the Trump Campaign and worked closely with **(012)** She made false claims of widespread election fraud in Arizona and in six other states. **ELLIS (015)** encouraged the Arizona Legislature to change the outcome of the election. She also encouraged Pence to accept the false Arizona Republican electors’ votes on January 6, 2021.

- **CHRISTINA BOBB (016).** BOBB (016) was an attorney for the Trump Campaign and worked closely with (012). BOBB (016) lobbied Arizona’s Republican legislators after the 2020 presidential election to disregard the popular vote in Arizona. She additionally helped organize the false Arizona Republican electors’ votes on December 14, 2020
- **MICHAEL ROMAN (017).** ROMAN (017) was the Director of Election Day Operations for the Trump Campaign. He worked closely with (012), EPSHTEYN (014), Unindicted Coconspirator 4, and others to organize the false Republican electors’ votes in Arizona and in six other states.
- **MARK MEADOWS (018).** MEADOWS (018) was Unindicted Coconspirator 1’s Chief of Staff in 2020. He worked with members of the Trump Campaign to coordinate and implement the false Republican electors’ votes in Arizona and six other states. MEADOWS (018) was involved in the many efforts to keep Unindicted Coconspirator 1 in power despite his defeat at the polls.

**D. Unindicted Co-Conspirators.**

The following individuals are included as unindicted members of the conspiracy:

- **Unindicted Coconspirator 1.** A former president of the United States who spread false claims of election fraud following the 2020 election.
- **Unindicted Coconspirator 2.** A former member of the Arizona Legislature who spread false claims of election fraud following the 2020 election. Unindicted Coconspirator 2 helped organize and distribute a false document on December 14, 2020, titled, “Joint Resolution of the 54<sup>th</sup> Legislature.”
- **Unindicted Coconspirator 3.** A former member of the Arizona Legislature who spread false claims of election fraud following the 2020 election. Unindicted Coconspirator 3 helped organize a “hearing” at a hotel in Phoenix on November 30, 2020, that both (012) and

**JENNA ELLIS (015)** attended. **Unindicted Conspirator 3** additionally signed the false December 14, 2020, "Joint Resolution of the 54<sup>th</sup> Legislature."

- **Unindicted Coconspirator 4.** An attorney for the Trump Campaign who drafted memos that encouraged having the fake Republican electors vote on December 14, 2020. **Unindicted Coconspirator 4** helped plan and organize the fake electors' vote on December 14, 2020, in Arizona, Georgia, Michigan, Pennsylvania, Nevada, New Mexico, and Wisconsin
- **Unindicted Coconspirator 5.** An Arizona attorney who worked for the Trump Campaign. **Unindicted Coconspirator 5** helped organize the Arizona Republican electors' vote on December 14, 2020, and previously represented the Republican Party, and **KELLI WARD (001)** in a lawsuit against the certified Arizona Democrat electors.

#### **E. The 2020 Presidential Election.**

The 2020 Presidential Election occurred during a global pandemic. In response to the pandemic, many states had expanded mail-in voting and that expanded mail-in voting delayed the final vote.

##### *1. Background.*

As states continued to count votes after election day on November 3, 2020, it became apparent that Biden would win, and **Unindicted Coconspirator 1** would lose the election **Unindicted Coconspirator 1** had suggested before the election that expanded mail-in voting was "very dangerous" because mail-in ballots are "fraudulent in many cases." Those statements turned into claims of outright fraud immediately following the election.

While **Unindicted Coconspirator 1** himself was unwilling to accept that he lost the election, **MEADOWS (018)** had confided in a White House staff member in early November 2020 that **Unindicted Coconspirator 1** had lost the election. Nevertheless, **Unindicted Coconspirator 1** wanted to keep fighting the election results, and **MEADOWS (018)** wanted to “pull this off” for **Unindicted Coconspirator 1**

Arizona was ultimately decided by 10,457 votes or 0.31% of the ballots cast. Biden won by small margins in five other states: (1) Georgia, 11,779 votes or 0.24%; (2) Michigan, 154,188 votes or 2.78%; (3) Nevada, 33,596 votes or 2.39%, (4) Pennsylvania, 81,555 votes or 1.16%; and (5) Wisconsin, 20,681 votes or 0.63%. Excluding Nevada, these states all had Republican-controlled Legislatures in 2020. New Mexico, where Biden won by a wider margin—99,720 votes or 10.79%, also had a Democrat-controlled legislature in 2020. These seven states became the focus of legal challenges and false claims of widespread election fraud.

*ii. Arizona Election Lawsuits.*

In Arizona, multiple parties filed election lawsuits after November 3, 2020. All were unsuccessful, but some were still pending on December 14, 2020, when

the Arizona Republican electors assembled to vote. None of these lawsuits would have changed the outcome of the election

The first suit, *Aguilera v. Fontes*, Maricopa County Superior Court No. CV2020-014562, was filed the day following the election, based on complaints about electronic ballot counting from two voters. It was dismissed by the court on November 29, 2020, for failure to state a claim on which relief could be granted. An appeal was filed on December 29, 2020, which was eventually denied on June 15, 2021, for lack of jurisdiction.

The Trump Campaign next filed a suit on November 8, 2020, in *Trump v. Hobbs*, Maricopa County Superior Court No. CV2020-014248. The claims relating to the Presidential election were dismissed five days later because the lawsuit would not have changed the outcome of the election. That prompted **KELLI WARD (001)** to text **MEADOWS (018)**, “WTH,” and ask **MEADOWS (018)** “[a]re our lawyers in AZ afraid of being blackballed by the left,” and conclude “[i]t sounds like that’s a total cop out.”

The Arizona Republican Party sued Adrian Fontes, then the Maricopa County Recorder, on November 12, 2020, in *Arizona Republican Party v. Fontes*, Maricopa County No. CV2020-014553. The court dismissed the claim six days

later, finding the “Arizona Republican Party’s case was meritless.” It was not appealed.

**KELLI WARD (001)** sued all eleven Democrat Party electors on November 30, 2020, in *Ward v. Jackson*, Maricopa County Superior Court No. CV2020-015285. Phoenix-based Trump Campaign attorney **Unindicted Coconspirator 5** told all eleven Arizona Republican electors, “[p]lease be aware that while I will be representing you ‘in name’ as presidential electors, I am also the attorney for the Arizona Republican Party and Donald J Trump for President, Inc ” and that he was waiting on “ [sic] to personally approve” the lawsuit. All eleven electors agreed to join the suit, but for “legal/optical reasons, Kelli [was] . the only plaintiff ”

The court dismissed the suit on December 4, 2020, finding that Maricopa County election officials followed the process for signature verification “faithfully in 2020” and found “no misconduct, no fraud, and no effect on the outcome of the election.” The court additionally found that “the evidence did not prove illegal votes, much less enough to affect the outcome of the election” and that **KELLI WARD (001)**, “has not proven that the Biden/Harris ticket did not receive the highest number of votes.”

**KELLI WARD (001)** appealed to the Arizona Supreme Court on December 4, 2020. The court denied her appeal, writing that the allegations in the suit were not “sufficient to call the election results into question,” that “there are no allegations of any violation of the EPM [Elections Procedures Manual] or any Arizona law,” and that “the challenge fail[ed] to present any evidence of ‘misconduct,’ ‘illegal votes’ or that the Biden Electors ‘did not in fact receive the highest number of votes for office,’ let alone establish any degree of fraud or a sufficient error rate that would undermine the certainty of the election results.” At the request of the Trump Campaign, **Unindicted Coconspirator 5** expedited an appeal to the United States Supreme Court before December 14, 2020. He later wrote to a Pennsylvania attorney, “Also just FYI—I recall now there was a rush to file our petition in order to give legal ‘cover’ for the electors in AZ to ‘vote’ on the 14<sup>th</sup> . . . .”

All eleven Arizona Republican electors and others sued Governor Doug Ducey on December 2, 2020, in Arizona Federal District Court Case *Bowyer v. Ducey*, No. CV-20-02321-PHX-DJH. The court dismissed their complaint on December 9, 2020, finding that the plaintiffs’ claims, “fail in their particularity and plausibility” and that their “‘expert reports’ reach implausible conclusions, often because they are derived from wholly unreliable sources.” The plaintiffs appealed

to the Ninth Circuit the following day, and the appeal was dismissed on April 13, 2021.

Two other election lawsuits were filed in Arizona, *Stevenson v. Ducey*, Maricopa County Superior Court No. CV2020-096490, and *Burk v. Ducey*, Pinal County Superior Court No. CV2020-01869. The plaintiffs in *Stevenson* voluntarily dismissed their case on December 7, 2020. Both the trial court, on December 15, 2020, and later the Arizona Supreme Court, on January 5, 2021, concluded that the plaintiff in *Burk* lacked standing to sue because she was not registered to vote.

#### **F. Pressure on Arizona Election Officials.**

In Arizona, Defendants, unindicted coconspirators, and others pressured the three groups of election officials responsible for certifying election results to encourage them to change the election results: (1) Maricopa Board of Supervisors; (2) the Arizona Legislature; and (3) the Governor. This pressure campaign was initially focused on the Maricopa County Board of Supervisors. As it became clear that they would not change the election results, the pressure campaign moved to the Arizona Legislature and Governor Ducey.

*1 Maricopa County Board of Supervisors.*

The Maricopa Board of Supervisors oversees elections in Maricopa County. In 2020, the Maricopa County Board of Supervisors had five members, four of which were Republican: Steve Chucri, Bill Gates, Clint Hickman, and Jack Sellers.

Almost immediately after the election, **KELLI WARD (001)** sent messages to each of the Republican members suggesting serious election fraud and malfeasance had occurred. **KELLI WARD (001)** urged the supervisors to delay certifying Maricopa County's results, and she urged the Republican supervisors to contact lawyers associated with the Trump Campaign about the alleged election fraud.

**(012)**, unindicted coconspirators, and others also tried to contact the Republican Supervisors. For example, an Arizona Congressional Representative sent a text message to **MEADOWS (018)** on November 8, 2020, that he had "placed some calls to the board of supervisors without connecting so far," later writing, "I can give you some idea what's going on with the county supervisors." **KELLI WARD (001)** sent **MEADOWS (018)** a text message on November 13, 2020, "Just talked to POTUS He may call the Chairman of the Maricopa Board of Supervisors," who was then Clint Hickman. Hickman later

received a call from the White House Switchboard on New Year's Eve, but he did not answer.

By mid-November, the Tea Party Phoenix Metro, sent an email to its subscriber list, which included **SAFSTEN (010)**, stating, "By the way, if the electoral college doesn't result in 270 electoral votes for either Presidential candidate, the 12th amendment is exercised, and guess what . . . Trump wins (because the House didn't go the way the Dems counted on it going), and our republic is saved from globalists!!" It then encouraged members to rally at the Maricopa County Board of Supervisors building to a "Stop the AZ Steal' protest rally against the County Board of Supervisors certifying the election results."

The Maricopa County Board of Supervisors unanimously certified the results of the election in November 2020. Some Defendants posted on social media urging others to contact the Maricopa County Board of Supervisors about delaying certification of the election. Following such posts, others publicly attacked the Republican Board of Supervisors, including threatening the Supervisors and their families.

On December 15, 2020, the Senate Judiciary Committee subpoenaed Maricopa County's voting machines. **(012)** was interviewed about the subpoena and stated that it was intended to "start forensically examining the

voting machines in Arizona.” The Board of Supervisors sued to quash the subpoenas on December 18, 2020, in *Maricopa v. Fann*, Maricopa County Superior Court CV2020-016840. All eleven Republican electors moved to join the suit on behalf of the Legislature, recognizing that a possible goal of the subpoenas was to “ensur[e] that their rivals, the Democratic Party’s electors, are not considered by Congress.” After filing the motion to intervene, **KERN (005)** wrote, “[g]reat move AZ GOP Electors! All 11 of us ;),” promoting a post by the Republican Party of Arizona arguing that “the Legislature should use its power to hold them [the Board of Supervisors] in contempt and throw them in jail.”

Throughout December, **(012)** then urged the Republican members of the Board of Supervisors to assist in obtaining access to vote-counting machines and ballots. In a voice message to Gates on Christmas Eve, for example, **(012)** asked to get access to the vote counting machines and ballots, stating, “[y]ou know, I really think it’s a shame that Republicans sort of are both in this, kind of, situation.” That day he also called Sellers and left the following message: “We’re all Republicans, I think we all have the same goal. Let’s see if . . . we can get this done outside of the court.”

*ii. Arizona Legislature.*

Russell “Rusty” Bowers served in the Arizona Legislature from 2015 until the beginning of 2023. He was elected in 2019 to a two-year term as the House and was Speaker of the House in 2020.

Bowers reported extensive pressure to take action after the election. He noted on November 11, 2020, “getting hundreds of emails demanding that I do my constitutional duty and name electors that will vote for Trump” and “very strange and unsettling phone calls telling me to do my duty and vote to elect electors who will vote for Trump.” On November 20, 2020, he wrote, the situation was “very stressful—attacks and tens of thousands of emails to intimidate me.”

Bowers received a call from the White House on November 22, 2020. In that call, (012) explained he understood there was a law in Arizona that would allow the legislature to meet and if there was sufficient doubt about the legality of the election, the legislature could vote to disallow Biden’s electors and put in Trump’s electors. (012) alleged Arizona had 14,000 dead people voting, 4,000 or 5,000 military ballots stolen, and 200,000 non-citizens voting. Bowers asked for evidence. (012) said he had the names and would give the names to Bowers.

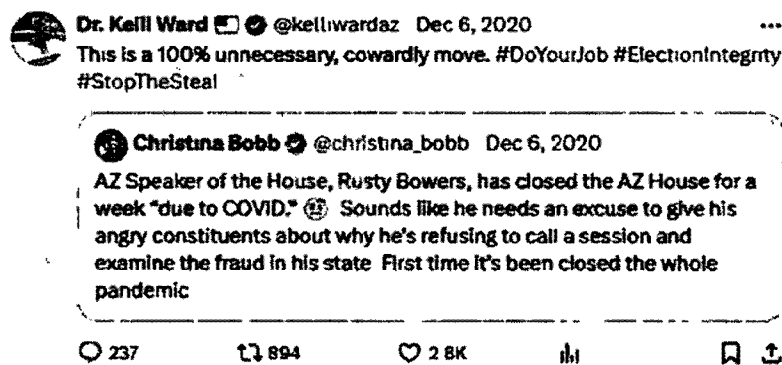
On December 1, 2020, (012) held a meeting at the Arizona Legislature with three associates, including JENNA ELLIS (015). Also present at the

meeting were several Republican legislators, including Bowers. (012)

and his team asked Bowers to hold a committee hearing on the election. When Bowers asked for any proof of election fraud, (012) said he had proof, but ELLIS (015) advised that it was left back in the hotel room. Bowers left the meeting shortly thereafter. The alleged proof was never provided to Bowers.

Bowers issued a press release on December 4, 2020, rebutting the allegations of election fraud. The next day he wrote, “threats and intimidation all day—thousands of demanding emails, everyone is a constitutional scholar which I am not. I just will not change the rules after the people voted!” On December 14, 2020, the day the Arizona Republican electors voted, Bowers wrote, “Hard days. . . Their hatred is pronounced,” referring to outside emails.

**CHRISTINA BOBB (016) and KELLI WARD (001)** posted on social media on December 6, 2020 the following.



On January 4, 2021, Bowers spoke with attorney **JOHN EASTMAN (013)**. In the conversation, **EASTMAN (013)** explained that a supermajority was not needed to convene a committee of the legislature. On January 6, 2021, Bowers spoke with an Arizona Congressional Representative. That Representative asked Bowers to support decertification of the election. Bowers declined because he did not believe the election was fraudulent.

*iii. Governor Doug Ducey.*

At the end of 2020, Arizona's Governor was Doug Ducey. On the day that then-Governor Ducey signed the certificate of ascertainment, which certified the vote, Governor Ducey received a call from the White House, which he did not answer. That day, **Unindicted Coconspirator 1** posted a series of tweets berating Governor Ducey for certifying the election. On the night of the certification, **(012)** posted on Twitter that Governor Ducey should not have certified the vote.

**G. The Fake Electors Scheme.**

Discussions about using the Republican electors to change the outcome of the election began as early as November 4, 2020. Those plans evolved during November based on memos drafted by Trump Campaign attorney **Unindicted Coconspirator 4**.

As an example, the then-United States Secretary of Energy texted **MEADOWS (018)** on November 4, 2020, “HERE’s an AGRESSIVE STRATEGY: Why can’t the states of GA NC PENN and other R controlled state houses declare this is BS (where conflicts and election not called that night) and just send their own electors to vote and have it go to the SCOTUS.”

Similarly, **MEADOWS (018)** received a text on November 5, 2020, that **Unindicted Coconspirator 1** should “urge GOP officials in close states to expose shenanigans and, if necessary, to refuse to seat Biden electors in the event of a fake count.” That same day, **Unindicted Coconspirator 1’s** son texted **MEADOWS (018)** a more developed plan revolving around the electors: “It’s very simple If through our lawsuits and recounts the Secretary of States on each state cannot ‘certify’ that states vote the State Assemblies can step in and vote to put forward the electoral slate Republicans control Pennsylvania, Wisconsin, Michigan, North Carolina etc. we get Trump electors.”

An Arizona Congressional Representative similarly texted **MEADOWS (018)** on November 6, 2020:

I’m sure you have heard of this proposal. It is to encourage the state legislatures to appoint a look doors [sic] in the various states where there’s been shenanigans. If I understand right most of those states have Republican Legislature’s [sic]. It seems to be

comport with glorified [sic] Bush as well as the Constitution. And, well highly controversial, it can't be much more controversial than the lunacy that were sitting out there now. And it would be pretty difficult because he would take governors and legislators with collective will and backbone to do that. Is anybody on the team researching and considering lobbying for that?

**MEADOWS (018)** responded, "I love it."

*i. Unindicted Coconspirator 4's Memos and the Trump Campaign's Response.*

**Unindicted Coconspirator 4** began working as an attorney for the Trump Campaign on a pro bono basis in mid-November 2020. He prepared three memos outlining how to use fake electors to overturn the election: (1) the November 18, 2020, memo; (2) the December 6, 2020, memo; and (3) the December 9, 2020, memo.

**Unindicted Coconspirator 4** claimed that under the ECA the electors needed to vote on December 14, 2020, to be counted. **Unindicted Coconspirator 4** argued that if there was a pending legal challenge that could change the outcome of the election from Biden-Harris to Trump-Pence, the Republican electors were required to meet and vote on December 14, 2020. If they did not, then the Vice President could not count the votes for Trump-Pence on January 6,

2021, even if **Unindicted Coconspirator 1** and Pence won a lawsuit that changed the outcome the election

As support, **Unindicted Coconspirator 4** cited the Hawaii election from 1960. There, initial election results showed that Richard Nixon and Henry Cabot Lodge won the popular vote during the presidential election, defeating John Kennedy and Lyndon Johnson by just 140 votes. Nixon was certified the winner by the Governor in November of 1960. A Hawaii court ordered a recount on December 13, 1960, which was pending on December 19, 1960, when the electors were required to meet and vote.

The Nixon-Lodge electors met and voted on December 19, 1960. On that day, the Kennedy-Johnson electors also met and voted. On December 30, 1960, Hawaii's courts determined that Kennedy-Johnson won the popular vote. The Governor then certified the Kennedy-Johnson electoral votes on January 4, 1961, and Congress received them on January 6, 1961. Nixon, who was the Vice President, and therefore Senate President, accepted the Kennedy-Johnson elector votes.

None of **Unindicted Coconspirator 4's** memos suggested that Republican electors precisely follow what occurred in the 1960 Hawaii election. Trump-Pence had lost in Arizona, Georgia, Michigan, Nevada, New Mexico, Pennsylvania, and

Wisconsin. **Unindicted Coconspirator 4** suggested that in each of these seven states the Trump Campaign should have the Republican electors vote on December 14, 2020, although none had a pending recount. As it became apparent that no election challenge would succeed by January 6, 2021, **Unindicted Coconspirator 4** departed further from the Hawaii example. Each memo is summarized below.

- November 18, 2020: This seven-page memo discussed only the Wisconsin Trump-Pence electors. In it, **Unindicted Coconspirator 4** concluded that the Trump-Pence electors must vote on December 14, 2020, in the event “a court decision (or, perhaps, a state legislative determination) rendered after December 14 in favor of the Trump-Pence slate of electors” changed the outcome of the Wisconsin election.
- December 6, 2020: This six-page memo argued that the Trump-Pence electors in Arizona, Georgia, Michigan, Nevada, Pennsylvania, and Wisconsin should meet and vote on December 14, 2020. It appeared to depart from the November 18, 2020 Memo in parts by suggesting that only a pending lawsuit, rather than a decision in favor of Trump-Pence, was necessary for the Vice President to reject the Biden-Harris electors on January 6, 2021 **Unindicted Coconspirator 4** outlined the general procedure the Republican Electors needed to follow when voting. In the December 6, Memo. **Unindicted Coconspirator 4** claimed he was “not necessarily advising this course of action” and that it was “a bold, controversial strategy.”
- December 9, 2020: This five-page memo outlined the Electoral Count Act procedure requirements for

presidential electors. It additionally discussed the state law requirements for presidential electors in Arizona, Georgia, Michigan, Nevada, Pennsylvania, and Wisconsin.

A Wisconsin attorney working on election challenges for the Trump Campaign, sent **Unindicted Coconspirator 4's** analysis to Trump Campaign Deputy Manager Justin Clark on November 25, 2020. Clark and other campaign officials supported **Unindicted Coconspirator 4's** recommendation to have the Republican electors vote in Wisconsin because they believed the lawsuit in Wisconsin could change the outcome of Wisconsin's election. Following both the ECA and the 1960 Hawaii election models, Campaign officials concluded that the Wisconsin Republican electors should vote on December 14, 2020, for Trump-Pence in the event their lawsuit succeeded.

**Unindicted Coconspirator 4** later insisted that Clark receive a copy of his December 6, 2020 Memo, writing a Wisconsin attorney, "I feel this memo—on why it's important all electors vote in all 6 contested states should vote on Dec. 14—should get to Justin Clark and others involved with national strategy ASAP." A Wisconsin attorney forwarded that memo, telling **Unindicted Coconspirator 4**, "I have bypassed Justin and am tryouts [sic] no [sic] to get it circulated at the White House." A Wisconsin attorney then sent **Unindicted Coconspirator 4's** December 6, 2020 Memo to **BORIS EPSHTEYN (014)**.

The memo eventually made its way to members of the Trump Campaign, some who questioned **Unindicted Coconspirator 4's** plan to have the Republican electors vote in all six listed states. With the exception of Wisconsin and possibly Georgia, they concluded that there were no pending lawsuits that could change the outcome of the election in the remaining six states. Trump Campaign officials also had general concerns about (012) efforts. For example, Advisor Jason Miller wrote **MEADOWS (018)** on December 6, 2020, "[a]ll guidance appreciated, as the legal turf war thing is new to me!"

ii. (012) takes control of the Fake Electors Scheme.

(012) and his team disagreed with the other's concerns, and their effort was bolstered by Texas' decision to sue Georgia, Michigan, Pennsylvania, and Wisconsin on December 8, 2020, to temporarily prevent the presidential electors from voting in those states, in *Texas v. Pennsylvania*. On December 9, 2020, **EPSHTEYN (014)** moved forward with having Republican electors vote in the seven contested states, including Arizona, by writing a Wisconsin attorney and **BOBB (016)**, "Question per Mayor-do you think you could prepare a sample elector ballot for Wisconsin." If so, **EPSHTEYN (014)** then asked if **Unindicted Coconspirator 4** would prepare sample ballots for "PA, Georgia, Michigan, AZ,

Nevada and New Mexico,” which was the first time New Mexico was listed for challenges. **Unindicted Coconspirator 4** responded, “[O]h absolutely” and that he “will do a memo on specifics of each state.” By December 11, 2020, **Unindicted Coconspirator 4** and a Wisconsin attorney had prepared a draft press release following the Trump-Pence elector voting plan, which they emailed to **EPSHTEYN (014)**, **MICHAEL ROMAN (017)**, and Joshua Findlay.

On December 11, 2020, the United States Supreme Court dismissed *Texas v. Pennsylvania*. At that point, some Trump Campaign officials determined the fake elector plan was legally unsound, but **(012)** wanted “to keep fighting.” Campaign attorneys then passed “everything off” to **Unindicted Coconspirator 4**. Clark emailed **Unindicted Coconspirator 4** that morning, “Josh [Findlay] has been running point on our contacts with electors. He can provide an update and hand off what he has to you this morning.” Findlay told **Unindicted Coconspirator 4**, “[i]t is my understanding from **(012)** team that you are now running point on this. I am happy to hand off what has been done so far.”

Trump Campaign officials then deferred much of the Republican elector plan to **(012)**, **EPSHTEYN (014)**, and **Unindicted Coconspirator 4**. **Unindicted Coconspirator 4** had emailed party officials in several of the contested states that he “talked with . . . **(012)** [sic], who is focused on doing

everything possible to ensure that that all the Trump-Pence electors vote on Dec. 14.” **Unindicted Coconspirator 4** included instructions for voting and a certificate of the vote template, concluding “Pretty simple!”

*iii ROMAN (017) refuses to add contingency language to the Republican electors’ vote certificates.*

During a conference call on December 12, 2020, a Pennsylvania attorney expressed concern that the certificate of vote falsely claimed that the Republican electors were the “duly elected and certified electors.” He requested adding language to the certificates indicating that the Trump-Pence electors’ votes were contingent on being certified the duly elected and qualified electors.

Based on that call, **Unindicted Coconspirator 4** texted **ROMAN (017)**, “Mike, I think the language at start of certificate should be changed in all states. Let’s look at the language carefully.” **ROMAN (017)** responded, “I don’t.” **Unindicted Coconspirator 4** then offered to “help with drafting in a couple hours,” but **ROMAN (017)** responded “fuck these guys.”

Pennsylvania insisted on the language. **Unindicted Coconspirator 4** prepared a draft and sent **ROMAN (017)** and Findlay the following email on December 13, 2020:

Mike, here is my suggested language for dealing with the concern raised in the PA conference call about

Electors possibly facing legal exposure (at the hands of a partisan AG) if they seem to certify that they are currently the valid Electors.

Easily fixed . . . .

It strike [sic] me that if inserting these few words is a good idea for PA, it might be worth suggesting to Electors in other states.

Pennsylvania attorneys eventually added the following introduction to their elector vote certificates:

**WE, THE UNDERSIGNED, on the understanding that if, as a result of a final non-appealable Court Order or other proceeding prescribed by law, we are ultimately recognized as being the duly elected and qualified Electors for President and Vice President of the United States of America from the State of Pennsylvania, hereby certify the following . . .**

**By December 12, 2020, Unindicted Coconspirator 4 had prepared documents for each state except New Mexico. ROMAN (017) asked Unindicted Coconspirator 4 to prepare New Mexico He did, and included his drafted contingency language as follows, “WE, THE UNDERSIGNED, on the understanding that it might later be determined that we are the duty elected and qualified Electors . . . .”**

*iv. Trump Campaign members refuse to support the Fake Electors Scheme*

The following day, Jason Miller texted Justin Clark, White House attorney Eric Herschmann, and campaign communications director Tim Murtaugh:

Just got a call from

-He said tomorrow our local counsels in four states are filing federal cases to keep the effort going (I didn't understand merits of cases), and that POTUS was aware of this.

-He said he's optimistic we win in Wisconsin state court tomorrow.

-He also said Boris [Epshteyn] has been coordinating state elector whip effort and I should connect with he and Christina BOBB.

All I know tomorrow is Elector Voting Day and that train you hear coming down the track isn't Burlington Northern.

Murtaugh had prepared the following statement for December 14, 2020, "As election contests continue in various states, the only prudent course was to have the President's electors vote in those places to preserve the campaigns [sic] rights " During the text conversation, Clark responded, "Now, I am not sure what is telling the president on this stuff so I'm not sure what his expectations are . . . Here's the thing the way this has morphed it's a crazy play so I don't know who wants to put their name on it," referring to the statement Murtaugh

prepared. (012) scheduled a conference call to discuss with BOBB (016), ELLIS (015), and others, which was shared in the text message thread, to which Herschmann responded, “[c]ertifying illegal votes.” Murtaugh eventually wrote that he was “not comfortable putting that statement out. . . . I can’t stand by it. From the looks of it, neither can any of you.” Clark responded, “I cannot. They need to put their names on it. Boris and Jenna.” Herschmann responded, “I agree.”

*v. EASTMAN (013) Pressures Pence to Change the Vote on January 6.*

On December 23, 2020, EASTMAN (013) wrote a memo laying out a scenario for January 6, 2021. In that memo, he recommended that Pence refuse to count Arizona’s certified Democratic electors because there were “multiple slates.” After refusing to accept the six other states with fake Republican electors, Pence would determine Unindicted Coconspirator 1 the winner of the election because Unindicted Coconspirator 1 would have had the majority of the remaining votes: “232 votes for Trump, 222 votes for Biden. Pence then gavel[s] President Trump as re-elected.”

EASTMAN (013) circulated a lengthier memo on January 3, 2021, discussing the “January 6 scenario” and “War Gaming the Alternatives.” EASTMAN’s (013)

clear intention was to change the result of the 2020 Presidential election on January 6, 2021, writing, “[t]he stakes could not be higher.” Without action from Pence, **EASTMAN (013)** concluded that “the sovereign people no longer control the direction of their government” and “will have ceased to be a self-governing people ”

**EASTMAN (013)** met with Pence and members of his staff on January 4, 2021, telling Pence that he could reject electoral votes or delay the vote count and ask state legislatures to reexamine the election to declare a winner. Pence rejected those ideas, but on January 5, 2021, **EASTMAN (013)** again met with Pence’s Chief Counsel, Greg Jacob, to ask Pence to reject the certified Biden-Harris electors during the counting of the electoral vote at the Joint Session of Congress. During that meeting, **EASTMAN (013)** admitted that his plan would lose if it went before the U.S. Supreme Court.

#### **H. Arizona Republican Electors Involvement in the Fake Electors Scheme.**

On December 8, 2020, a Wisconsin attorney sent **Unindicted Coconspirator 4** and a Trump Campaign staffer, an email that said, the Trump Campaign staffer “is in touch With [sic] White House, Arizona and PA. They are interested I am copying them so they can work directly with you and link to the other States.”

That day, **Unindicted Coconspirator 5** called **Unindicted Coconspirator 4** to discuss having the Arizona Republican electors vote on December 14, 2020, prompting a Wisconsin attorney to text **Unindicted Coconspirator 4**, "Heard et al are pushing this and you spoke to Arizona Congratulations "

**Unindicted Coconspirator 4** responded:

Hi, I talked to [**Unindicted Coconspirator 5**] in Arizona, and emailed him info, including a draft of the footnote explaining that both electoral slates voting is not an odd thing

He told me \_\_\_\_\_ is really pushing this, and he was trying to understand exactly why

He asked if I talked to \_\_\_\_\_ I said Jim did, and also apparently read the memo

I got across that unless the Arizona Trump votes are sent to Congress on time, there's no real excuse to debate Arizona

He also gets that Biden making the safe harbor doesn't prevent Congress from debating, or the Senate from voting as it wants, though the Electoral Count Act obviously is politically problematic

I told him we might file in WI Supreme Court with that footnote by Saturday, which could help with messaging

Feel free to pass this on to \_\_\_\_\_ It sounds like the states will do this if \_\_\_\_\_ insists, especially if the President has specifically asked \_\_\_\_\_ to make sure this happens. If any

state is uncertain, maybe a call from the President would be worthwhile. Sounds like he's really hands on!

Arizona GOP Director **GREGORY SAFSTEN (010)** called **Unindicted Coconspirator 4** on December 10, 2020, to discuss “the logistics of the electors voting on Dec 14.” That prompted **Unindicted Coconspirator 4** to email **SAFSTEN (010)** and **Unindicted Coconspirator 5** the documents he prepared for the Arizona Republican electors.

**KELLI WARD (001)** organized Arizona Republican electors for December 14, 2020, and worked directly with **SAFSTEN (010)**, **Unindicted Coconspirator 4**, and a Republican National Committee attorney for planning. **Unindicted Coconspirator 4** emailed **Unindicted Coconspirator 5** on December 11, 2020, to confirm that he still planned to file an appeal in *Ward v. Jackson*, writing:

Reason is that Kelli Ward & [**Unindicted Coconspirator 2**] just spoke to the Mayor about the campaign’s request that all electors vote Monday in all contested states.

Ward and [**Unindicted Coconspirator 2**] are concerned it could appear **treasonous** for the AZ electors to vote on Monday if there is no pending court proceeding that might, eventually, lead to the electors being ratified as the legitimate ones.

Which is a valid point—in the Hawaii 1960 incident, when the Kennedy electors voted there was a pending recount.

**Unindicted Coconspirator 4** followed, “Just spoke with [**Unindicted Coconspirator 5**]. I now [sic] longer see cause for concern. His Supreme Court filing is at the printer ” **Unindicted Coconspirator 5** confirmed, “Correct. The attached are being ‘e-filed’ as we speak . . . .”

On December 13, 2020, **KELLI WARD (001)** sent **Unindicted Coconspirator 4** an email with concerns that certified Democratic electors for Biden-Harris would not be voting in the state capitol building. **Unindicted Coconspirator 4** responded that Arizona law did “not specify a location for the vote” and that voting did not need “to be in the capitol bldg.”

The Arizona Republican electors met on December 14, 2020, at the Arizona Republican Party Headquarters, posting a picture to twitter.com. The Arizona Republican electors additionally recorded themselves voting and posted the video to social media websites, prompting **KELLI WARD (001)** to write, “Oh yes we did! We are the electors who represent the legal voters of Arizona! #Trump2020 #MAGA ” The Arizona Republican Party’s official statement was largely copied from a template that **Unindicted Coconspirator 4** and a Wisconsin attorney prepared for all states. The party claimed it was following what happened in 1960 in Hawaii until there was “a final resolution of Arizona’s 11 electoral votes ”

In late December 2020, the Trump Campaign had Pennsylvania attorney Bruce Marks and **EASTMAN (013)** file an appeal to the United States Supreme Court regarding Pennsylvania's election in *Trump v. Boockvar*. Following that decision, Marks emailed a Wisconsin attorney, "[t]he Campaign wants us to work together with professor eastman to file an Article II cert petition from Wisconsin." Related to that discussion, Marks emailed **Unindicted Coconspirator 5** asking questions about his Supreme Court appeal in *Ward v. Jackson*. That prompted **Unindicted Coconspirator 5** to respond, "(Also just FYI – I recall now that there was a rush to file our petition in order to give legal 'cover' for the electors in AZ to 'vote on the 14<sup>th</sup> . . . that discussion is below, as well as [**Unindicted Coconspirator 4's**] comments on the petition.)"

Marks responded by questioning how *Ward v. Jackson* would change the outcome of the election:

Even if the court erred in not allowing further examination, what is the argument that reason further discovery would have led to changing the election, if the error rate is 2%, the higher number, and the ballots at issue is 450,000?

The petition does not argue that these ballots (9,000 at my estimate) were improperly counted for Biden when they should have been counted for Trump.

Thanks, we are trying to understand this in formulating the [Supreme Court] strategy.

All 11 Arizona Republican electors, **KELLI WARD (001)**, **TYLER BOWYER (002)**, **NANCY COTTLE (003)**, **JACOB HOFFMAN (004)**, **ANTHONY KERN (005)**, **JAMES LAMON (006)**, **ROBERT MONTGOMERY (007)**, **SAMUEL MOORHEAD (008)**, **LORRAINE PELLEGRINO (009)**, **GREGORY SAFSTEN (010)**, and **MICHAEL WARD (011)**, joined then-Texas Congressional Representative Louie Gohmert in suing Pence on December 27, 2020. Their complaint alleged that “Gohmert will object to the counting of Arizona electors voting for Biden, as well as to the Biden electors from the remaining Contested States.” The plaintiffs attempted to have the court declare that Pence could “exercise the exclusive authority and sole discretion in determining which electoral votes to count for a given State.” **KELLI WARD (001)** explained the purpose of the suit on twitter:



**Dr. Kelli Ward** @kelliwardaz · Dec 30, 2020

“Friendly” In that we are in the same political party - but know this: we are suing VP Pence to ensure he understands that he has the power to do his constitutional duty on January 6. And we expect him to do it. That’s it.



**The Epoch Times** @EpochTimes · Dec 30, 2020

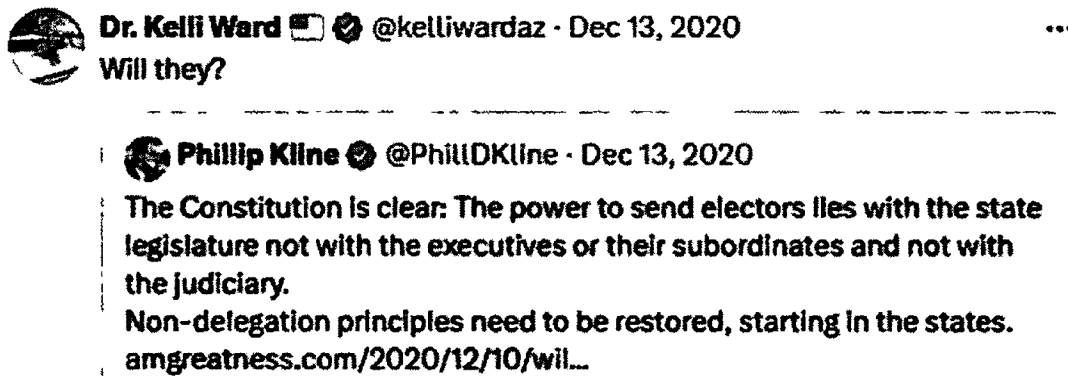
#Arizona GOP Chairwoman @KelliWardAZ, a co-plaintiff in a lawsuit against VP @Mike\_Pence, described the suit as a “friendly” one.

The lawsuit, according to Ward, argues that the “Constitution takes precedent over statute.” [theepochtimes.com/arizona-gop-ch...](https://theepochtimes.com/arizona-gop-ch...)

In addition to their lawsuit against Pence, other Arizona Republican electors made statements directly contradicting any intention that their votes would only be used if they succeeded in a legal challenge that changed the outcome of Arizona’s election.

*i. KELLI WARD (001).*

The day before voting as a Republican elector, **KELLI WARD (001)** posted to twitter indicating that her goal was to have the Arizona Legislature certify the fake Republican electors’ votes:



On December 15, 2020, **KELLI WARD (001)** posted a video explaining why she and the other “true” electors had voted for **Unindicted Coconspirator 1** on December 14, 2020. She stated, “We believe that we are the electors for the legally cast votes here in Arizona.”

Leading up to January 6, 2021, **KELLI WARD (001)** continued calling for the Arizona Legislature to change the outcome of the election. She published Pence’s

January 6, 2021, letter explaining that he would accept the certified Democratic electors for Biden-Harris on January 6, 2021, and wrote, “Pray that @VP @Mike\_Pence doesn’t send our Republic to it’s [sic] demise—crashing and burning into socialism, communism, & tyranny” Later that day, she thanked Arizona Congressman for objecting to Arizona’s certified Democratic electors’ votes during the Joint Session of Congress. And when Congress adjourned because the January 6, 2021 rioters breached the Capitol, she wrote, “Congress is adjourned. Send the elector choice back to the legislatures.”

*ii. TYLER BOWYER (002).*

**BOWYER (002)** made public statements demonstrating the contingency plan was cover for his attempt to change the outcome of the election. On November 27, 2020, he wrote, “#BidenCheated” and “Americans deserve the true election results.”

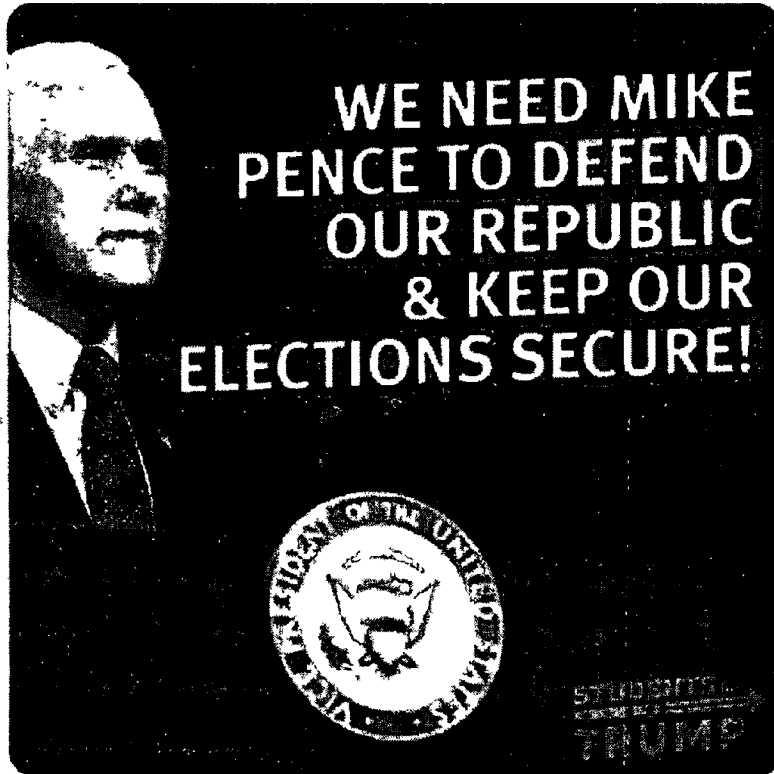
On December 15, 2020, after voting for Trump-Pence, **BOWYER (002)** wrote, “this just gives potential ground to not accept electors from states with competing electors.” **BOWYER (002)**, after *Gohmert v. Pence* was filed, posted to twitter.



**Tyler Bowyer** @tylerbowyer · Dec 28, 2020

It's pretty simple: The President of the United States Senate (VP) has the awesome power of acknowledging a specific envelope of electoral votes when there are two competing slates— or none at all.

The 12th amendment covers dispute resolution when it occurs in the House of Reps.



He followed with:



**Tyler Bowyer**

@tylerbowyer

We don't live in a Democracy. The presidential election isn't democratic.

11:21 PM · Dec 23, 2020



*iii JACOB HOFFMAN (004).*

**HOFFMAN (004)** signed the fake December 14, 2020, “Joint Resolution of the 54<sup>th</sup> Legislature” declaring that “the Legislature is required to exercise its best judgment as to which slate of electors the voters prefer” and requesting “that the alternate 11 votes electoral votes be accepted for to Donald J. Trump or to have all electoral votes nullified completely until a full forensic audit can be conducted.”

On January 5, 2021, **HOFFMAN (004)** sent a letter to Pence asking him to “delay the certification of the election results and instead seek clarification from the Arizona Legislature as to which slate of Presidential Electors are proper and accurate.” **HOFFMAN (004)** was later interviewed by a reporter on January 11, 2021. When asked about voting as an elector, he responded

In unrepresented times, unprecedented action is occurred. There is no case law, there’s no precedent that exists as to whether or not an election that is currently being litigated in the courts has due standing. Which is why, we felt it appropriate to provide Congress and the Vice President with dueling opinions.

*iv. ANTHONY KERN (005).*

On December 15, 2020, **KERN (005)** was interviewed by a reporter for Epoch Times. He was asked about the Republican electors voting on December 14, 2020. He responded:

So yesterday, as you know, December 14, the electors cast their vote for the presidential, uh, elect. In Arizona and several other states, the Biden electors voted for Biden and the Trump electors at the same time voted for President Trump. So both those slates of electors went to the Capitol. And uh and on January 6, Vice President Mike Pence gets a choice on which electors he's going to choose, and I'm, I'm almost positive that the, uh that, on January 6 there going to be a contested uh electoral process and if that's contested there's going to be a debate, and once there's debate, they're going to come back and vote, and it's going to be just a nice constitutional lesson for all America to see

On December 17, 2020, **KERN (005)** posted on social media, "I'm calling on @SpeakerBowers and @dougducey to call an emergency session to decertify the Biden electors Then I want a grand jury convened based on the evidence brought to light today. The Coup cannot hide in the darkness." He later suggested that Americans "[c]all or email" certain US Senators "and ask to object to the Biden electoral ballots," and he falsely claimed on December 31, 2020, that "[a] majority of legal Arizona voters chose @realDonaldTrump for a second term. #J6 #DoNotCertify."

On January 5, 2021, **KERN (005)** spoke at “Stop the Steal” rally in D.C., claiming **Unindicted Coconspirator 1** was the “true winner” of the election, and would be named President the following day at the Joint Session of Congress



**v. SAMUEL MOORHEAD (008).**

On June 18, 2022, **MOORHEAD (008)** wrote on Twitter.com:

We need to take some action about the 2020 election. I advocate in AZ the legislature decertify the slate of Biden Electors and certify the slate of Trump electors I would hate to go to my grave knowing the electoral vote I cast was not counted.”



**vi. MICHAEL WARD (011).**

Before voting as a fake elector, **MICHAEL WARD (011)** accompanied his wife, **KELLI WARD (001)**, to Washington D.C., where he posted a picture of Kelli talking to **Unindicted Coconspirator 1**:

 **Michael P Ward**  
December 1 2020  ...  
Another call tonight from POTUS...can't say what he said but I can say keep the pressure on  
Ducey!



Following his vote on December 14, 2020, **MICHAEL WARD (011)** posted to Facebook.com:

 **Michael P Ward**  
December 14 2020  ...  
Proud to cast my vote today as one of Arizona's 11 legitimate Electors for President Donald J  
Trump and VP Mike Pence!

As late as May 2022, **MICHAEL WARD (011)** continued to reinforce that the election was stolen, writing on Twitter: "Hey #J6 FU."

Based on the above, and other information reviewed, Defendants and their unindicted coconspirators deceived the public with false claims of election fraud in order to prevent the lawful transfer of the presidency, to keep **Unindicted Coconspirator 1** in office against the will of Arizona's voters, and deprive Arizona voters of their right to vote and have their votes counted. By sending in false

electoral votes, they obtained a benefit under Arizona law by creating the opportunity for Pence to reject the legitimate certified Democratic elector votes for Biden-Harris and declare **Unindicted Coconspirator 1** the winner of the 2020 Presidential election.

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona.

True Bill  
(A "True Bill")

KRISTIN K. MAYES  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated: 4/23/2024

  
NICHOLAS KLINGEMAN  
Assistant Attorney General

  
Foreperson of the Grand Jury

SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY

CR2024-006850-016 DT

05/21/2024

HONORABLE SHELLIE SMITH

CLERK OF THE COURT  
A. Chee  
Deputy

STATE OF ARIZONA

NICHOLAS KLINGERMAN

v.

CHRISTINA BOBB (016)

THOMAS F JACOBS

COMM. SHELLIE SMITH  
JUDGE DANIEL MARTIN  
VICTIM WITNESS DIV-AG-CCC

NOT GUILTY ARRAIGNMENT

9:23 a.m.

Courtroom CCB 402

State's Attorney: Nicholas Klingerman and Krista Wood  
Defendant's Attorney: Thomas Jacobs  
Defendant: Present

A record of the proceedings is made digitally in lieu of a court reporter.

Defendant waives the advisement.

Defense counsel waives formal reading of the charge(s).

IT IS ORDERED entering a Not Guilty Plea to all charges on behalf of the Defendant at this time.

SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY

CR2024-006850-016 DT

05/21/2024

In preparation for the Initial Pretrial Conference (IPTC), the parties shall do the following:

1. The defense attorney shall conduct a conflicts check within the office to determine whether a conflict exists. If a conflict exists, counsel shall staff the conflict with the appropriate supervisor, and counsel shall file the appropriate Motion to Withdraw so new counsel can appear at the Initial Pretrial Conference.

2. Motions to Modify Release Conditions shall be heard at the Initial Pretrial Conference. Motions shall be filed with the assigned Commissioner not later than 10 days prior to the Initial Pretrial Conference.

3. If a plea agreement is extended by the State, the State shall extend the plea not later than 10 days before the Initial Pretrial Conference. Defense Counsel shall make reasonable efforts to present the plea to in custody defendants before the Initial Pretrial Conference.

4. Motion for Rule 11 Evaluations shall be heard at the Initial Pretrial Conference. Motions shall be filed with the assigned Commissioner not less than 10 days before the Initial Pretrial Conference.

5. Defense Counsel shall prepare and file a List of Specific Items of Discovery required under Rule 15.1 (b), but which were not disclosed. See Rule 15.2(e). Such list shall be filed with the assigned Commissioner not less than 5 days before the Initial Pretrial Conference.

6. All electronic media (audio tapes, CD's, etc.) or documents which require language translation shall be submitted to the Court Interpretation and Translation Department (CITS) on or before the IPTC hearing date.

7. The Initial Pretrial Statement shall be filed with the assigned Commissioner not less than 3 days before the Initial Pretrial Conference hearing date.

**ANY MOTION TO MODIFY RELEASE CONDITIONS, OR RULE 11 MOTIONS NOT FILED BEFORE THE INITIAL PRETRIAL CONFERENCE WILL BE HEARD AT THE COMPREHENSIVE PRETRIAL CONFERENCE BEFORE THE DESIGNATED MASTER CALENDAR JUDICIAL OFFICER. ALL MOTIONS SHALL BE IN WRITING WITH SPECIFIC FACTS TO SUPPORT THE MOTIONS.**

This case is assigned to Judge Martin.

SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY

CR2024-006850-016 DT

05/21/2024

IT IS FURTHER ORDERED setting an Initial Pretrial Conference for 7/2/2024 at 8:15 a.m. before Commissioner Henderson.

IT IS ORDERED setting a Comprehensive Pretrial Conference for 8/1/2024 at 8:30 AM before Judge Martin.

As to Count(s) 1-9, for which the Court conducts an Initial Appearance this date,

IT IS ORDERED releasing the Defendant on his/her own recognizance with permission to continue to reside out of state.

Defendant having failed to provide proof of ten-print fingerprints in accordance with A.R.S. § 41-1750,

IT IS ORDERED that Defendant report to the Maricopa County Sheriff's Office for ten-print fingerprinting within twenty days of today.

IT IS ORDERED that the attorneys for both the State and Defense be prepared to provide the court with the following information at the Comprehensive Pretrial Conference (CPTC):

A. The status of plea negotiations. This includes whether or not the State has tendered an offer; if so, when it expires; the results of the settlement conference; and whether or not a Donald advisement is required.

B. The status of disclosure by both the State and Defense. This includes what discovery has been disclosed and what discovery still needs to be disclosed. If any discovery is left undisclosed, it is required that all parties comply with Rule 15.6 and provide appropriate affidavits.

C. The number of days required for trial.

D. The number of witnesses to be used at trial, including any out-of-town witnesses. And the number of expert witnesses to be used at trial.

E. The status of interviews. This includes how many interviews have been conducted and how many are left to complete. This includes whether or not any depositions are going to be required. If depositions are required, it is ordered that the party file a motion requesting same no later than two days before the CPTC date.

SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY

CR2024-006850-016 DT

05/21/2024

- F. Whether or not an interpreter is going to be required for either a witness or the defendant or both.
- G. The number of jurors required for trial along with the recommended number of alternates.
- H. Whether or not the State is requesting an aggravating factors trial to the jury.
- I. Any special jury instructions.
- J. Whether or not either party is requesting a lesser-included offense.
- K. Whether or not there are any anticipated substantive motions to be filed by either party.
- L. Whether or not there are any motions in limine anticipated.

IT IS FURTHER ORDERED setting a Final Trial Management Conference (FTMC) on 10/10/2024 at 8:30 AM before Judge Martin.

IT IS ORDERED setting the Trial Assignment date on 10/17/2024 at 9:00 a.m. before the Master Calendar Assignment Judge. The Trial Assignment hearing is in person for all lawyers and defendants. The parties should contact the Trial Assignment division prior to the Trial Assignment date to request to appear virtually. The purpose of the hearing is to set dates for (1) the Trial Procedure Conference and (2) the jury selection date.

All self-represented litigants shall appear in person at the trial assignment date unless otherwise ordered. All in custody defendants shall be transported unless otherwise ordered.

Should the Trial Assignment Judge approve a virtual appearance, the Assignment Judge's division will email parties instructions and a link to join the Court Connect videoconference (for more information, visit <https://superiorcourt.maricopa.gov/court-connect/>). A hearing participant can also join by telephone by dialing 917-781-4590 and entering Access Code 103 815 458#. If a virtual appearance has been approved counsel of record and defendants are ordered to appear via videoconference with their webcams enabled.

IT IS ORDERED that the Defendant shall contact and meet with his/her attorney in person no later than three weeks from this date, for the purpose of preparing for the Initial Pretrial Conference.

SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY

CR2024-006850-016 DT

05/21/2024

NOTICE TO DEFENDANTS:

Failure to comply with the above orders may result in revocation of Defendant's release from custody and/or the imposition of other sanctions.

The Defendant may be tried in his/her absence if he/she fails to appear for trial.

The Defendant is advised that, if convicted, the Defendant will be required to appear for sentencing. If the Defendant chooses not to appear, and the Defendant's absence prevents the Defendant from being sentenced within ninety days from the conviction, the Defendant may lose the right to a direct appeal.

LAST DAY: 11/17/2024.

Defendant is directed to appear at all scheduled court hearings and advised of the potential consequences should he/she fail to appear.

9:26 a.m. Matter concludes.

KRISTIN K. MAYES  
Attorney General  
Firm Bar No. 14000

Clerk of the Superior Court  
FILED  
J. Hockerson, Deputy  
05/06/2024 11:36 AM

NICHOLAS KLINGERMAN  
State Bar No. 028231  
Assistant Attorney General  
2005 N. Central Avenue  
Phoenix, Arizona 85004  
Telephone 602-542-3881  
crmfraud@azag.gov

Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.

**CHRISTINA BOBB (016),**

Defendant.

Case No: **CR 2024 - 006850 - 016**

**93 SGJ 81**

**SUMMONS OF THE  
STATE GRAND JURY**

An Indictment has been filed on this 23<sup>rd</sup> day of April, 2024, in this Court, against you, **CHRISTINA BOBB (016)**, charging that in the Superior Court, Maricopa County, Arizona, on or about November 3, 2020 and continuing through on or about January 6, 2021, the crimes of **COUNT 1: CONSPIRACY**, a Class 2 Felony, in violation of A.R.S. § 13-1003, **COUNT 2: FRAUDULENT SCHEMES AND ARTIFICES**, a Class 2 Felony in violation of A.R.S. § 13-2310(A), **COUNT 3: FRAUDULENT SCHEMES AND PRACTICES**, a Class 5 Felony, in violation of A.R.S. § 13-2311, **COUNTS 4-9: FORGERY**, Class 4 Felonies, in violation of A.R.S. § 13-2002(A), have been committed.

**YOU ARE HEREBY SUMMONED** to appear before this Court to answer the Indictment at the Central Court Building – Lower Level, Court Room 4, 201 W. Jefferson, Phoenix, Arizona 85003 at **8:30 a.m. on May 21, 2024.**

**Failure to appear without good cause as summoned will place you in contempt of Court, and a warrant will be issued for your arrest.**

Requests for reasonable accommodation for persons with disabilities must be made to

the division assigned to the case by parties at least three (3) judicial days in advance of a scheduled court proceeding and may be done by calling (602) 506-0094. Requests for an interpreter for persons with limited English proficiency must be made to the division assigned to the case by the party needing the interpreter and/or translator or his/her counsel at least ten (10) judicial days in advance of a scheduled court proceeding.

**YOU ARE FURTHER ORDERED** to appear to be photographed and fingerprinted, prior to the arraignment date above, by the Maricopa County Sheriff's Office, Records and Identification Division, 201 W. Jefferson, West Court Building, 4<sup>th</sup> Floor, Phoenix, Arizona, between the hours of 7:30 a.m. to 4:30 p.m., Monday through Friday. **An appointment is not necessary; however, if you need more information, please call (602) 876-1047.**

**TO BE PROCESSED YOU MUST BRING THIS SUMMONS, SOME FORM OF IDENTIFICATION** (i.e., Arizona Driver's License, Arizona Social Services card, Arizona I.D. card, Resident Alien card, or Military I.D. card, AND if you are under eighteen (18) years of age, a copy of the minute entry remanding your case to adult court).

GIVEN UNDER MY HAND AND SEAL of said Court this 23 day of APRIL, 2024, by order of the Court.

Defendant's Address:

JEFF FINE  
Clerk of the Superior Court

6626 Winding Lake Dr.  
Jupiter, FL 33458-3719

By:   
Deputy Clerk

#12030438

OFFICER'S RETURN

I certify that:

- This summons was served by <sup>EMAIL</sup> certified mail, receipt attached;
- I personally served this summons;
- I personally attempted to serve this summons

on 4/24/24 at 3<sup>55</sup> a.m. (p.m.) on the 24<sup>TH</sup> day of APRIL,  
cristina eddy  
 2024 at EMAIL SERVICE DVOLLRATHE MRLAUFARM.COM, Arizona.

If not served, reason: \_\_\_\_\_

Agency: AZAGO

By: [Signature] 453  
 Deputy Sheriff/Officer Jim Cape

TO BE COMPLETED BY OFFICER TAKING FINGERPRINTS & PHOTOGRAPH:

Case No.: \_\_\_\_\_ Date: \_\_\_\_\_

Time: \_\_\_\_\_ Location: \_\_\_\_\_

Officer: \_\_\_\_\_

**LAW OFFICES OF THOMAS JACOBS**  
**271 North Stone Avenue**  
**Tucson, Arizona 85701**  
**PHN: (520) 628-1622**  
**FAX: (520) 628-4534**

Thomas Jacobs, Esq.  
State Bar No. 013275  
P.C.C. No. 64489  
tjacobs@jacobsazlaw.com  
Attorneys for: CHRISTINA BOBB.

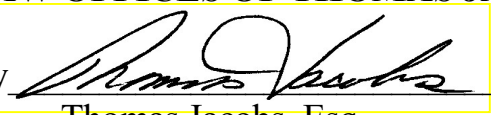
IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF MARICOPA

STATE OF ARIZONA,	)	No. CR2024-006850-016
	)	
Plaintiff,	)	<b>MOTION FOR TEMPORARY</b>
	)	<b>REMOVAL OF OFFICIAL</b>
vs.	)	<b>COURT FILES, TRANSCRIPTS</b>
	)	<b>OR EXHIBITS (M.C. Local Rule</b>
<b>CHRISTINA BOBB (016),</b>	)	<b>2.8-e)</b>
	)	
Defendant.	)	Comm. Shellie Smith
_____	)	

Defendant, CHRISTINA BOBB (016), hereby moves this court to permit temporary removal of the Grand Jury Transcript and requests that the Grand Jury Transcript be provided to the Defendant temporarily.

RESPECTFULLY SUBMITTED this 16<sup>th</sup> day of May 2024.

**LAW OFFICES OF THOMAS JACOBS**

By  \_\_\_\_\_  
Thomas Jacobs, Esq.  
Attorney for Defendant Christina Bobb

Copy of the foregoing electronically  
delivered this 16<sup>th</sup> day of May 2024, to:

Hon. Commissioner Shellie Smith  
Maricopa County Superior Court  
Phoenix, Arizona 85003  
[Andrew.Baiza@JBAZMC.Maricopa.Gov](mailto:Andrew.Baiza@JBAZMC.Maricopa.Gov)

Nicolas Klingerman  
Krista Wood  
Arizona Attorney Generals Office  
Phoenix, Arizona 85004  
[Nicolas.Klingerman@azag.gov](mailto:Nicolas.Klingerman@azag.gov)  
[Krista.Wood@azag.gov](mailto:Krista.Wood@azag.gov)  
Attorney for State of Arizona

Lacy A. N. Cooper, Esq.  
SCHMITT SCHNECK CASEY EVEN & WILLIAMS PC  
Phoenix, Arizona 85014  
[Lacy@azbarristers.com](mailto:Lacy@azbarristers.com)  
Co-Counsel for Defendant James Lamon

Brad Miller, Esq.  
Chandler, Arizona 85248  
[Office@BradLMiller.com](mailto:Office@BradLMiller.com)  
Attorney for Defendants Michael Ward and Kelli Ward

Ashley D. Adams, Esq.  
Chase T. Wortham, Esq.  
ADAMS & ASSOCIATES, PLC  
Scottsdale, Arizona 85251  
[aadams@azwhitecollarcrime.com](mailto:aadams@azwhitecollarcrime.com);  
[chase@azwhitecollarcrime.com](mailto:chase@azwhitecollarcrime.com)  
Attorneys for Defendant John Eastman

Joshua S. R. Kolsrud, Esq.  
Sandra Schutz, Esq.  
KOLSRUD LAW OFFICES  
Phoenix, Arizona 85012  
[Josh@KolsrudLawOffices.com](mailto:Josh@KolsrudLawOffices.com)  
Attorneys for Defendant Lorraine Pellegrino

Michael G. Gailey, Esq.  
TULLY BAILEY LLP  
Phoenix, Arizona 85028  
[mbailey@tullytbailey.com](mailto:mbailey@tullytbailey.com)  
Attorneys for Defendant Boris Epshteyn

Anne Chapman, Esq.  
Lee Stein, Esq.  
MITCHELL STEIN CAREY CHAPMAN, PC  
Phoenix, Arizona 85004  
[anne@mscclaw.com](mailto:anne@mscclaw.com); [lee@mscclaw.com](mailto:lee@mscclaw.com)  
Attorneys for Defendant Mark Meadows

John K. Dosedall, Esq.  
JACKSON WHITE ATTORNEYS AT LAW, PC  
Mesa, Arizona 85201  
[criminaldocket@jacksonwhitelaw.com](mailto:criminaldocket@jacksonwhitelaw.com)  
Attorneys for Defendant Nancy Cottle

Anthony Pacheco, Esq.  
RYAN RAPP UNDERWOOD & PACHECO PLC  
Phoenix, Arizona 85012  
[apacheco@rrpklaw.com](mailto:apacheco@rrpklaw.com)  
Attorneys for Defendant Tyler Bowyer

Dennis I. Wilenchik, Esq.  
WILENCHIK & BARTNESS, PC  
Phoenix, Arizona 85004  
[admin@wb-law.com](mailto:admin@wb-law.com)  
Attorneys for Defendant James Lamon

\*George J. Terwilliger III  
P.O. Box 74  
Delaplane, VA 20144  
[george@gjt3law.com](mailto:george@gjt3law.com)  
\*Pro Hac Vice motion pending  
Attorneys for Defendant Mark Meadows

**LAW OFFICES OF THOMAS JACOBS**  
**271 North Stone Avenue**  
**Tucson, Arizona 85701**  
**PHN: (520) 628-1622**  
**FAX: (520) 628-4534**

Thomas Jacobs, Esq.  
State Bar No. 013275  
P.C.C. No. 64489  
tjacobs@jacobsazlaw.com  
Attorney for: CHRISTINA BOBB.


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

STATE OF ARIZONA,	)	No. CR2024-006850-016
	)	
Plaintiff,	)	<b>DEFENDANT CHRISTINA</b>
	)	<b>BOBB'S NOTICE OF NO</b>
vs.	)	<b>OBJECTION TO REQUEST FOR</b>
	)	<b>MEDIA AT ARRAIGNMENT</b>
<b>CHRISTINA BOBB (016),</b>	)	
	)	Assigned to:
Defendant.	)	Comm. Shellie Smith
_____	)	

Defendant, CHRISTINA BOBB (016), does not object to the media request for live web stream of the Arraignment scheduled for May 21, 2024, submitted on or about May 13, 2024, by the Arizona Republic/Stacey Barchenger.

RESPECTFULLY SUBMITTED this 15<sup>th</sup> day of May 2024.

**LAW OFFICES OF THOMAS JACOBS**

By  \_\_\_\_\_  
Thomas Jacobs, Esq.

Attorney for Defendant Christina Bobb

Copy of the foregoing electronically  
delivered this 15<sup>th</sup> day of May 2024, to:

Hon. Commissioner Shellie Smith  
Maricopa County Superior Court  
Phoenix, Arizona 85003  
[Andrew.Baiza@JBAZMC.Maricopa.Gov](mailto:Andrew.Baiza@JBAZMC.Maricopa.Gov)

Nicolas Klingerman  
Krista Wood  
Arizona Attorney Generals Office  
Phoenix, Arizona 85004  
[Nicolas.Klingerman@azag.gov](mailto:Nicolas.Klingerman@azag.gov)  
[Krista.Wood@azag.gov](mailto:Krista.Wood@azag.gov)  
Attorney for State of Arizona