



**THE  
GAVEL  
PROJECT**  
EST. 2021

## **Exhibit 5**

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4022 E. Greenway Road, Suite 11 - 139, Phoenix, AZ 85032

**THEGAVELPROJECT.COM**

## DECLARATION OF ANDREW MYERS

I, Andrew Myers, hereby declare as follows under penalty of perjury:

1. I am over the age of 18 and competent to make this declaration.
2. I am a citizen of the United States and of the State of Arizona.
3. I reside in Phoenix, Arizona.
4. From October 14, 2022, through November 15, 2022, I served as a part-time employee of the County working as a level one signature verification worker. I also performed ballot curing.
5. At my location, in the room where I worked there were a total of about 15 people reviewing and verifying signatures. We were divided into two rooms and the other room had about 10 people working. In addition, there was also a night crew of several people working from about 3 p.m. until about 7:30 p.m.
6. The process for signature verification of ballots was composed of two levels, and a third level developed toward the end of the four weeks. Level one was composed of part-time employees of the county who compared an image of the ballot envelope against three images of a signature in the voter file which are normally the three most recent images of voter forms. I performed level 1 review, and we were the most inexperienced of all levels.
7. Ballot signatures at level one review were either approved or rejected; another way to describe rejected ballots was that they were marked "exception."
8. If a ballot signature was rejected, then it was automatically reviewed at level 2. Level 2 signature verification was composed of managers who were longer, part-time employees of the county and had the most experience at signature verification. This

would also include the full-time managers and supervisors for the county. Review at level 2 allowed the managers to view the same three images as level 1, but level 2 was also allowed to see additional images of the signatures in the entire voter file and were allowed to zoom in on signature images.

9. There was a level 3 review of signatures developed at the end of the project. Level 1 workers were the most inexperienced workers and were being asked to overrule level 2's decision on the excepted signatures. Level 1 was given the same access that level 2 had, which was first time many of the level 1 had seen the history of the voter's signatures. I did not take part in this, because I felt that I did not have enough experience to overrule level 2 decision. Also, shortly after the request was made, I had to work on curing.
10. Level 2 managers were the full-time managers and supervisors, of the county and some long-term part-time employees like Andrew.
11. When the excepted numbers grew the managers would resend those excepted signatures back out into the general pool, hoping that someone would approve those same signatures, which would thereby reduce the excepted signature load.
12. After the above signature review, the approved signature ballots were counted, and the rejected signature ballots were sent into a process whereby the ballots could be cured.
13. The bulk of what I did was curing. The curing process was as follows. Michelle would bring a USPS bin with green affidavits. We would put a preprinted label on the affidavit, marked "LS" for letter sent with that day's date also preprinted on the label. We would then take the "labeled" affidavits to Melissa, minus the affidavits that did

not have phone numbers. Melissa would scan the green envelopes which would generate an address label for each affidavit.

14. We would then put the address label on an envelope that was pre-stuffed with a letter informing the voter that the county was having trouble verifying their signature. The voter was given a phone number to the Star Center to assist with curing their ballot. Thereafter, we would put the green envelopes in alphabetical order. I was responsible for working through files beginning with letters M-Z. After everything was in alphabetical order, we would start the curing process.
15. The curing process consisted of matching print outs from Star Center, a third-party contractor, or the Text to Cure method. When we had a cure matched and approved, we would paper clip the printout from Star Center or Text to Cure to the green envelope and the supervisor would stamp "Signature Verified" and send it to Runbeck to be rescanned. The text to cure process changed toward the end of the election. We were no longer curing through the Text to Cure method but were only using Star Center print outs. Celia said it took too long to print out text to cure and she would handle it.
16. Observers were allowed to watch and listen to my curing work. I rarely made calls.
17. The process in my curing room was controlled and there were really only two of us doing the curing and putting labels on and matching print outs with green envelopes.
18. The first week I worked about thirty-five (35) hours over five days. I worked primarily on curing, but in terms of signature verification, I processed about 3,000 ballots the first week. The rejection rate was about 15-20%, so about 450 to 600 ballots were rejected by me this first week.

19. The second, third and fourth week I worked about fifty (50) hours per week. I worked on curing and do not believe I processed any signature verification on ballots in weeks two, three and four.
20. The total ballots I processed for signature verification over four weeks was about 3,000 and the total ballots I rejected was about 450 to 600, but that was because almost all of my time was spend on curing and not on signature verification.
21. In my room we had a white board that Michelle would update with the number of ballots to be verified that day. Throughout the day Michelle would update the progress the people were making in verifying signatures. The math never added up. Typically, we were processing about 60,000 signatures a day. I would hear that people were rejecting 20-30% which means I would expect to see 12,000 to 15,000 ballots in my pile for curing the next day. However, I would consistently see every morning only about 1000 envelopes to be cured. We typically saw about one tenth of the rejected ballots we were told we would see.
22. Andrew, one of the signature reviewers, would tell me every day that I was going to get crushed the next day because he was excepting (rejecting) a “ton” of bad signatures. However, we never saw a correlation.
23. I can only think of two explanations for why our cure pile was consistently only about a tenth of the numbers we were expecting based on the information given to us by the level 1 signature verification teams. The first explanation is that the signature verification workers were incorrect. I do not think this is the case because I spoke with many of them, and the difference was consistently ten times less than we expected. The second explanation is that the level 2 managers who re-reviewed the

rejections of the level 1 workers were reversing and approving signatures that the level 1 workers excepted and rejected. This seems to me to be the more likely explanation. If this is the case, then the level 2 managers were changing about 90% of the rejected signatures to accepted.

24. The computer records show the number of signature rejections by all workers at all levels. All approval of rejected ballots by level 2 should be evidenced on the computer system.
25. There was a black bin that held green envelopes where the voter told the caller during the curing process that they had not voted, or it that was not their ballot.
26. When I left work on my final day of November 15, I estimate that in my room there were 5,000 uncured envelopes. There were a number of voters that were never able to vote because they said that they went through the curing process, but their ballots were never cured. I recall one lady in particular who sent an email claiming that she had successfully completed the curing process but was told she was not cured. I did my best to look through the above pile of 5,000 envelopes to resolve her situation. Her ballot should have been in that batch, but it was not. This is simply one example of the disorganized situation we experienced.

I declare under penalty of perjury that the above is true and correct.

Signed:   
Andrew Myers

Date: 12/7/22

## DECLARATION OF YVONNE NYSTROM

I, Yvonne Nystrom, hereby declare as follows under penalty of perjury:

1. I am over the age of 18 and competent to make this declaration.
2. I am a citizen of the United States and of the State of Arizona.
3. I reside in Mesa, Arizona.
4. From October 31, 2022, through November 15, 2022, and November 20, 2022 and November 21, 2022. I served as a part-time employee of Maricopa County working as a level 1 signature verification worker. It was my job to, among other things, perform signature verification on ballots.
5. To perform our work, we were given the following materials, and were told to follow them:
  - a. Attached as Exhibit A is the “Maricopa County Elections Department, 2022 General Election” manual,
  - b. Attached as Exhibit B is the “Electronic Adjudication Board Procedures,” and
  - c. Attached as Exhibit C is the “Maricopa County Elections Department VRAS System-Research” manuel.
6. At my location, there were a total of 24 people reviewing and verifying signatures. We were divided into two rooms. In addition, there was also a night crew, in which I was part of the night crew, of about eight to ten people working 3 p.m. until about 7:30 p.m.
7. The process for signature verification of ballots is as follows:
  - a. There were three levels for signature verification. Level one was composed of part-time employees of the county who compare an image of the ballot envelope

against one to three images of a voter's signature in the voter file which are normally the three most recent images of voter forms.

- b. ballot signatures at level one was either approved or rejected; another word for rejected ballots was "exception."
- c. If a ballot signature was rejected then it was automatically reviewed at level 2. Level 2 signature verification was composed of managers who were more experienced employees of the county. Review at level 2 included the same images as level 1, but level 2 was allowed to see more images of the signature in the voter's file, and was allowed to zoom in on signature images.
- d. There was a level 3 review of signatures as well. It is not clear whether this third level was part of level two or an additional level. In any event, I worked at level one and it was my clear understanding that there were three levels of review, and that each of the above levels had the ability to reverse a rejection of a ballot signature. Level 2 could reverse level 1. Level three could reversed level 1 and/or 2. Level 3 managers also would send the whole managers "que" back to the level 1 part-time employees to review the signatures that had already been rejected by level 1 and 2 personnel to accept the signatures or reject them again.
- e. There were observers watching the review of level 1. Some observers in other rooms were able to see some of level 2 managers. I do know that in my room for the evening shift, the observers were not able to see or observe the managers in my room.
- f. After the above signature review, Runbeck batched ballots into categories for those with approved signatures and rejected signatures. The accepted ballots were



sent to ballot processing and counted and the rejected signature ballots were sent into a process whereby the ballot could be cured.

- g. The curing process was flawed for at least two reasons: (1) inadequate personally identifiable information (“PII”) and (2) an inability for the voter to see and verify that their signature was in fact the signature being viewed by the curing worker. The voter was on the phone and, of course, could not see signature that was being viewed by the curing worker on the actual green envelope.
- h. The process for curing included a person who would call the voter at the number listed on the green envelope. Most of the time, perhaps sixty to seventy (60% - 70%) of the time the person calling the alleged voter only had the name on the ballot, the phone number and the address. This was because the curing worker was not at a computer and was only able to look at the actual green envelope. However, the person who sent the green envelope and ballot was permitted to write a phone number on the green envelope that was mailed in that was different from the one listed in their voter file. This occurred a number of times. There were probably forty percent (40%) of phone numbers on the green envelopes that were different from the number listed in the voter file. Of course, voters do change phone numbers, but this seemed to be a very large number of different numbers. The above struck me and the curing workers as odd.
- i. Observers were allowed into the curing process, but not in some areas. Some of the curing process occurred in the ballot processing room and the observers were only allowed in a designated area in that room and that area was far away from where the curing employees were working.

- j. The part-time employees performing of the curing function were given a batch of stickers to place on a ballot, including stickers indicating that a ballot was: “Letter Sent (LS),” “Left Message (LM),” “Phone Disconnected (PD),” “Wrong Number (WN),” “Verified (VER),” and other statuses. One of the problems with the stickers was that workers were not controlled or kept accountable with access to stickers and placement of stickers. Nothing prevented a worker from accessing many “approved” stickers and placing them on ballots. Once stickers were placed on ballots there was no record on the ballot or elsewhere to determined who placed the sticker there; there were no individual identifying initials or signatures on the sticker. The system was insecure and subject to abuse by permitting false placement of approved stickers without accountability.
8. If a signature was rejected then it would be reviewed by the first level manager which was William, Jeff Beimer, or Andrew George. Those are the three first level managers. If these managers agreed with me and also rejected the signatures, then it went to the next level managers, for second level manager approval. Those second level managers were Aloma Richmond, Michelle Acker, Tony (Antonio) Ortiz, and Celia Nabor. Bill Gates was occasionally there, but I don’t know if he performed signature verification review. Scott Jarrett and Rey Valenzuela were co-elections directors, and they were there every day. I am not sure if Scott and/or Rey performed signature verification of not, but they were third level managers.
9. We had observers watching level 1 signature verifiers such as myself, but they did not watch all level 2/3 managers who also performed approvals and rejections on signature

verification. There were times when my level 1 que of work was worked by a level 2 or level 3 manager above me without observers watching their work.

10. My job was to review a scan of the actual green affidavit with the voter's signatures and to match the signature with one of the three (or less) signatures of the voter on file to verify or reject the signature.

11. I worked a total of 16.5 hours in signature verification during the time I was working the election. The other hours were spent in ballot processing, ballot duplication, ballot adjudication and SEB (Special Elections Board).

12. It took me approximately a minute on each signed affidavit envelope to either approve or reject a voter's signature. Some affidavits took much less time due to no signature, obvious wrong signature, a protected signature and such. Those signatures were immediately rejected.

13. From my experience during my time, the rejection rate for bad signatures was approximately thirty-five to forty percent (35% - 40%). The highest rate of rejection was forty percent.

14. I do not know the rejection rate for others in my room, but I do know that a lot of people working in my room said that they were also not verifying numerous signatures because of how bad they were.

15. On November 15<sup>th</sup>, before we left for the last day of the job, Jacque and I questioned Aloma about the remaining ballots requiring curing because there were still several bins with about two to three thousand ballots to be cured. Aloma told us we were free to go and to not worry about those thousands of ballots since they were only for the managers

to handle. However, it is my understanding that no observers monitored the curing process of the managers.

16. The computer records from EVRT program showed the number of signature rejections by me and the managers. I do not know how many times the managers reversed my rejection of the signatures. I was not able to see that information. I do know that observers were not watching the work of the managers above me who had the ability to change my rejection of signatures. If one of the managers changed by rejection, then that should be recorded under their name in the computer records of the EVRT program.
17. The reversal of signature rejections was handled through a process of curing. This was after the last level of managers still disapproved of the envelope signature it would go to the process of calling the voter to cure the signature. We had a script to talk to the voter or leave a scripted message for them to call the Star Center, which was a third-party contractor that worked completely off-site but had the same access to the voter's file information as we did on the computers at MCTEC, to cure their affidavit signature. My understanding of the Star Center's curing process was to verify information from the voter's file, i.e., the last 4 of their SS #, driver's license #, street address, full name and any other identifying information in their file. It is my understanding that the Star Center was able to cure and did cure ballots, but were not able to see the actual ballot with the signature on it. It is my understanding that the Star Center work was not monitored with observers, whereas my work was required to be monitored by observers. Since they had the ability to cure and reverse the rejection of signatures, I do not know why their work was not monitored by observers.

18. Part of the process for curing ballots that had been rejected for bad signatures, was for the part-time employees to call a number for the voter and speak with a person they thought could be the voter. They would ask for personal identifying information (“PII”) to confirm the person and ask them if they were the voter, but the person who allegedly voted was never able to see the signature to see if it was their signature, they would simply say they were the voter, give some PII, and say they signed the affidavit.
19. There were times that the curing workers called voters that had rejected signatures and those alleged voters would tell us that they never voted. For example, we had some college students who said they never voted and did not sign the ballots. Obviously, we voided those ballots, but as long as the person on the phone said they were the voter, and was able to give some PII, it is my understanding that those ballots were approved and went on to the ballot processing, even if the signature was previously rejected.
20. The permanent employee managers were Tony (Antonio) Ortiz, or Aloma Richmond or Michelle Acker. They had more experience and were trained on curing poor signatures. When they cured a ballot that had been signed by the spouse, it is my understanding they would just put a label on the affidavit with the voter’s name on it that said the husband or wife had signed the affidavit for the other as a type of household signature exchange. The ballot would then go to Runbeck for scanning and the green ballot envelope would go through the same signature verification as any other ballot envelope.
21. On the last day of work, November 15, we were asked by manager Celia to go through perhaps 5,000 to 7,000 ballots, that had already been rejected at levels 1, 2 and 3. We were asked to go to the SHELL program and to only find one signature that matched the green envelope, even if all other signatures in the program did not match the green

envelope. The implication from Celia is that was desperate to get the work complete and that she wanted the ballots approved. These 5,000 to 7,000 ballots had already been through the full level 1, 2, and 3 process and been rejected. Therefore, I do not know why were going through them again, and that is why it seemed that Celia wanted them approved.

I declare under penalty of perjury that the above is true and correct.

Signed: Yvonne Nystrom  
Yvonne Nystrom

Date: 12-7-22

## DECLARATION OF JACQUELINE ONIGKEIT

I, Jacqueline Onigkeit, hereby declare as follows under penalty of perjury:

1. I am over the age of 18 and competent to make this declaration.
2. I am a citizen of the United States and of the State of Arizona.
3. I reside in Phoenix, Arizona.
4. From October 14, 2022, through November 16, 2022, I served as a part-time employee of the County working as a level one signature verification worker. It was my job to, among other things, perform signature verification on ballots.
5. At my location, there were a total of about 24 people reviewing and verifying signatures. We were divided into two rooms. In addition, there was also a night crew of about six to eight people working 3 p.m. until about 7:30 p.m.
6. The process for signature verification of ballots was composed of three levels. Level one was composed of part-time employees of the county who compared an image of the ballot envelope against three images of a signature in the voter file which are normally the three most recent images of voter forms. I performed level 1 review.
7. Ballot signatures at level one review were either approved or rejected; another way to describe rejected ballots was that they were marked "exception."
8. If a ballot signature was rejected, then it was automatically reviewed at level 2. Level 2 signature verification was composed of managers who were longer term part-time employees of the county. Review at level 2 allowed the managers to view the same three images as level 1, but level 2 was also allowed to see additional images of the signatures in the entire voter file and were allowed to zoom in on signature images.

9. There was a level 3 review of signatures as well, but it is unclear whether this third level was simply part of level two or a truly additional level. In any event, I worked at level 1, and it was my clear understanding that functionally, there were three levels of review, and that each of the above levels had the sole ability to reverse a rejection of a ballot signature. Level 2 could reverse level 1. Level 3 could reverse level 1 and/or 2.
10. Level 2 managers were William, Jeff, and Andrew. I do not know their last names. Level 3 managers were Aloma, Michelle, Tony, Celia, and Bill Gates. I do not know their last names except for Bill Gates.
11. At times when the workload was high, level 2 and 3 managers sent some of their work – which was to review our level 1 work – back to level 1 to re-review the work we had already done.
12. There were observers watching the review of level 1, but there were not any observers watching all of the review of levels 2 and 3. Sometimes the observers were able to watch some of the work of Andrew (a level 2 manager) but were not able to observe any of the work of the other level 2 managers: Jeff and William.
13. After the above signature review, the approved signature ballots were counted, and the rejected signature ballots were sent into a process whereby the ballots could be cured.
14. There were two major problems with the curing process. First, there was inadequate personally identifiable information (“PII”) that was necessary to truly confirm the identity of the alleged voter. Second, when the alleged voter was on the phone, they did not have the ability to actually see and verify that the signature on the ballot



matched their signature. The curing worker was able to see the signature, but the alleged voter was not.

15. the process for curing included a person who would call the voter at the number listed by the person who filled out the ballot envelope. In many cases, the person calling the alleged voter only had the pre-printed name and address on the ballot, and the phone number which was written on the ballot envelope by the alleged voter. However, the person who sent the ballot was able to give a phone number that could be different from the one listed in the voter file; this did occur a number of times. I performed curing work and there were many times that the phone number written on the ballot by the alleged voter was different than the number or numbers in the voter file. Sometimes the number written by the alleged voter on the ballot was not found anywhere among the multiple number listed in the voter file.
16. Observers were allowed to watch and listen to my curing work.
17. In order to perform the curing process, we were given a batch of stickers to place on a ballot, which included stickers with abbreviations. Some, but not all, of the ballot stickers and abbreviations were as follows: "VER" meant that we verified the voter's information, and their ballot was approved to be counted, "WV" meant that a voter did not want to verify their ballot over the phone, and "LM" meant that we called the voter and left a message.
18. One of the problems with the stickers was that nothing prevented a level 1, 2 or 3 worker from requesting a massive amount of "approved" stickers and placing them on ballots. Again, observers did not watch any level 3 work and did not watch most of level 2 work. Once stickers were placed on ballots, there was no record on the ballot

or elsewhere to determine who placed the sticker there. We were told to not sign or initial the sticker, but to only date it. Accordingly, there was no way to know who placed “verified” stickers on ballots. The system was wide open to abuse and allowed for potential false placement of “verified” stickers without accountability.

19. The first week I worked about thirty-five (35) hours over five days. I processed about 1,500 ballots per day, and about 7,500 ballots the first week. The rejection rate was about 25-30%, so about 1,875 to 2,250 ballots were rejected by me this first week.
20. The second week I worked about sixty (60) hours per week for six days. I processed about 1,750 ballots per day, and about 10,500 ballots the second week. The rejection rate was about 25-30%, so about 2,625 to 3,150 ballots were rejected by me this second week.
21. The third week I worked about sixty (60) hours per week for seven days. I processed about 1,750 ballots per day, and about 12,250 ballots the third week. The rejection rate was about 35-40%, so about 4,287 to 4,900 ballots were rejected by me this third week.
22. The fourth week I worked about sixty (60) hours per week for seven days. I processed about 1,750 ballots per day, and about 12,250 ballots the fourth week. The rejection rate was about 35-40%, so about 4,287 to 4,900 ballots were rejected by me this fourth week.
23. The total ballots I processed for signature verification over four weeks was about 42,500, and the total ballots I rejected was about 13,074 to 15,200.
24. The fifth week we only worked Monday, Tuesday, and Wednesday but I only cured ballots and did not perform signature verification the fifth week.

25. The other workers in my room had similar complaints about bad signatures resulting in the rejection of ballots. I believe the rejection rates for their ballots were similar to my rejection rates.
26. There were times that Tony and/or Michelle would make us leave at about 7:30 – 8:30 p.m. and they would be there later than us working on signature verification – not curing – but just signature verification. When we would come in the next day, we would ask them how late they were there, and they would tell us they were there until 9:30 or 10:00.
27. One example of the above occurred on November 15<sup>th</sup>. Before we left for the day, Yvonne and I asked Aloma about the remaining ballots because there were still several bins with about two to three thousand ballots. I did not know whether these ballots required original signature verification or curing work, but we did both types of work. Aloma told us we were free to go and to not worry about those thousands of ballots since they were only for the managers to handle. However, it is my understanding that no observers monitored the work of the managers on those ballots.
28. The computer records show the number of signature rejections by me and the managers. Tony said this information can be accessed from the computers by IT workers. I do not know how many times the managers reversed my rejection of the signatures. I was not able to see that information. I do know that observers were not watching most of the work of the level 2 managers above me who had the ability to change my rejection of signatures. Observers were not watching any of the work of the level 3 managers above me who had the ability to change my rejection of signatures. I do know that if one of the managers changed my rejection, then that

should be recorded under their name in the computer records. I know this because Andrew told me that all of our actions for level 1, 2 and 3 workers were recorded in the computer system under each of our names.

29. There were times that the curing workers called voters with rejected signatures and those alleged voters they told them that they never voted. For example, we had some college students who said they never voted and did not sign the ballots submitted in their names. Obviously, we voided those ballots, but as long as the person on the phone said they were the voter, and was able to give some PII, it is my understanding that those ballots were approved, even if the signature was previously rejected.

I declare under penalty of perjury that the above is true and correct.

Signed:   
Jacqueline Onigkeit

Date: 12/6/22