

Multiple Documents

Part	Description
1	Main Document
2	Exhibit Declaration of Pinny Sheoran
3	Exhibit REDACTED Declaration
4	Exhibit Declaration of Daniel Rivera
5	Exhibit Declaration of Don Overlock
6	Exhibit Declaration of John Evans
7	Exhibit Declaration of Lois Hansen
8	Exhibit Declaration of Karen Devine
9	Exhibit Declaration of Lorna Banister
10	Exhibit Declaration of Leslie Hanson
11	Exhibit Declaration of Rachel Homer Part One
12	Exhibit Declaration of Rachel Homer Part Two
13	Proposed Order

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

League of Women Voters of Arizona,
Plaintiff,
vs.
Lions of Liberty LLC; Yavapai County
Preparedness Team; Jim Arroyo, Lucas
Cilano; Nicholas Cilano; Brian Mounsey;
Toby Fox; Bruce Mounsey; James Johnson;
Melody Jennings; Clean Elections USA;
John Does 1-10,
Defendants.

No. CV-22-08196-PCT-MTL

**PLAINTIFF’S MOTION FOR A
TEMPORARY RESTRAINING
ORDER AND PRELIMINARY
INJUNCTION
AND MEMORANDUM OF LAW IN
SUPPORT OF PLAINTIFF’S
MOTION**

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PRELIMINARY STATEMENT

1
2 Defendant Melody Jennings and Defendant Clean Elections USA (“CE-USA”) are
3 the planners and coordinators of a scheme that is threatening the integrity of Arizona’s
4 elections. Defendants have spent months recruiting agents to execute their plan to surveil
5 Arizonans who vote at drop boxes, photograph their faces and license plates while they
6 vote, and baselessly accuse targeted individuals of voter fraud. They have sanctioned their
7 followers conducting this surveillance while masked, bearing firearms, and clothed in
8 tactical gear. Defendants and their agents have a right to their political beliefs, a right to
9 bear arms in the State of Arizona, and a right to wear whatever clothing they please—but
10 those rights are far from absolute. They do not have a right to station themselves as an
11 anonymous, threatening, armed militia looming over voting locations in the United States
12 of America. Such surveillance of voting is quintessentially intimidating and brazenly
13 threatens the voting processes central to most “fundamental political right[:]” the right to
14 vote. *Yick Wo v. Hopkins*, 118 U.S. 356, 370 (1886). Defendants bear direct responsibility
15 for the scheme they have unleashed.

16 Plaintiff League of Women Voters of Arizona (the “League”) seeks a Temporary
17 Restraining Order and Preliminary Injunction pursuant to Federal Rule of Civil Procedure
18 65. A separate motion for similar preliminary relief is currently pending before this Court.
19 *Arizona Alliance for Retired Americans v. Clean Elections USA*, No. 2:22-cv-1823, ECF
20 No. 2 (hereinafter “AARA”). Plaintiff brings this parallel motion to present the Court with
21 important evidence relevant to the propriety (and urgency) of that relief, including
22 declarations from voters and Plaintiff’s members affected by Defendants’ drop box
23 surveillance and related conduct.¹ Plaintiff seeks an order barring Defendants, their co-

24
25 ¹ In addition to Defendants Jennings and CE-USA, Plaintiff’s complaint names the
26 Lions of Liberty, Yavapai County Preparedness Team, and its associated officers and
27 agents as defendants. Yesterday evening, Thursday, October 27, the officers of Yavapai
28 Defendants sent out “an Official Stand Down order” to their agents, volunteers and
followers, indicated that they were to “stepping down [their] sponsorship of Operation
Drop Box” in response to Plaintiff’s suit and due to concerns that other drop box
monitoring groups might be acting lawlessly. *See* Homer Decl., Ex. Y. In light of the

1 conspirators, and all of their volunteers and agents, from engaging in activity that is
2 actively intimidating voters. Plaintiff’s motion does not seek to enjoin all Arizonans from
3 engaging in constitutionally protected conduct in the wake of the voter intimidation crisis
4 caused by Defendants’ actions. Rather, Plaintiff seeks to constrain the agents, volunteers,
5 and confederates of Defendants from continuing an unlawful scheme that has had the
6 demonstrated effect of dissuading Arizonans from voting using lawful and secure
7 methods that the State has employed for years.

8 STATEMENT OF FACTS

9 Defendants’ campaign is inspired by a thoroughly discredited conspiracy theory
10 that so-called “mules” illegally deposited large numbers of ballots at drop boxes to steal
11 the 2020 election in various closely contested states, including Arizona. *See* Decl. of
12 Rachel F. Homer (“Homer Decl.”), Exs. A-B. As false claims in the documentary spread
13 online, viewers began to circulate viral images of drop box voters and election officials
14 portrayed in the film. *See Id.*, Ex. F. Some viewers began to post photos of individuals
15 who had purportedly voted illegally—but, in fact, had not—in turn subjecting those voters
16 to harassment and threats.

17 Defendants Jennings and CE-USA subscribe to the “mules” conspiracy theory and
18 launched “Dropbox Initiative 2022” in response. The goal of the campaign is to surveil
19 and harass voters at drop boxes and “gather video (and live witness evidence) of any
20 ballot tampering that takes place in real time.” *Id.*, Ex. K. Defendants are hoping to have
21 at least ten monitors at each drop box. *Id.* Defendants began organizing drop box
22 surveillance during the 2022 summer primary, referring to it as the campaign’s “first run”
23 before the general election. *Id.*, Ex. F. Defendant Jennings has stated that the objective of
24 the surveillance tactics she has indeed had an intimidating effect on voters during the

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27 Stand Down Order, Plaintiff declines to seek emergency relief enjoining Yavapai
28 Defendants at this time. However, Plaintiff reserves the right to seek such relief in the
future from this Court.

1 primary, with one post declaring: “We ram [*sic*] one mule off just by being there”
2 *Id.*, Ex. Z.

3 As we approach the November 8 elections, Defendants activities are continuing
4 unabated—they are recruiting and coordinating with volunteers for their surveillance-
5 and-intimidation campaign on platforms used by election deniers and extremist groups.
6 For example, Defendants are actively recruiting volunteers on Truth Social, a social
7 media platform well-known for disseminating election-related conspiracy theories.
8 Further, on an October 17, 2022, appearance on Steve Bannon’s *War Room*, Defendant
9 Jennings made clear that she ensures all monitors are “one of us,” implying that she is
10 only recruiting volunteers who already believe in the “mules” conspiracy theory. *See*
11 Homer Decl., Ex. K.

12 Critically, neither Defendants nor any of their volunteers or other co-conspirators
13 have any good-faith basis to conclude that a voter who deposits multiple ballots is doing
14 so illegally, because Arizona law specifically permits voters to deposit multiple ballots in
15 a number of circumstances. *See* Ariz. Rev. Stat. § 16-1005(I). Nevertheless, Defendants
16 have accused voters, without evidence, of illegal activity. For example, on October 16,
17 Defendant Jennings posted a highly shared social media post showing camera footage of
18 a voter, implying (without evidence) that the voter was engaged in illegal activity. Homer
19 Decl., Ex. N. The next day, Defendant Jennings called for additional volunteers to surveil
20 drop boxes in Mesa and Phoenix, alleging that her “crew” had spotted a “mule.” *Id.*, Ex.
21 M.

22 In their TRO motion, the AARA plaintiffs have proffered evidence *inter alia*, that
23 (1) Defendants’ conspired to intimidate voters, (2) that Defendants actively intend to
24 “dox” voters for engaging in lawful voting, and (3) that Jennings affirmed that two
25 individuals who appeared at a Mesa, Phoenix drop box on Friday Oct. 21 were affiliated
26 with Defendants and sanctioned their use of masks, firearms, and tactical gear to surveil
27 polling places. To avoid duplication here, Plaintiff League of Women Voters of Arizona
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1 adopts and incorporates the evidence and argument presented in the AARA plaintiffs'
2 TRO motion.

3 A series of serious incidents of voter harassment and intimidation occurred almost
4 immediately after Defendants' agents began conducting surveillance occurring during the
5 early voting period. Plaintiff has obtained additional evidence from voters who lodged
6 complaints of voter intimidation and members of the League about the impact of
7 Defendants' surveillance. *See* Decl. of Complainant 240 (redacted); Decl. of Daniel
8 Rivera; Decl. of Donald C. Overlock; Decl. of John I. Evans.

9 On the evening of Monday, October 17, the individual who later filed complaint
10 #240 drove with his wife to the drop box at Maricopa Juvenile Court in Mesa to deliver
11 their ballots. When they arrived they saw between six and nine individuals stationed in
12 the parking lot clearly filming and photographing voters as they deposited their ballots.
13 One of the monitors had a very large camera. Complainant #240's wife was afraid that
14 observers could use cameras to zoom in on personal information in their ballots and target
15 them for harassment. She wanted to leave instead of voting. Complainant #240 told his
16 wife he would cover the ballots under his shirt to prevent observers from obtaining
17 personal information. When he got out of his car to drop off his ballot, he was followed
18 by four individuals at a distance of about 30 feet. The observers asked him if he was a
19 "mule" and told him they were "hunting mules." Complainant #240 reversed his car away
20 from the drop box to prevent the observers from photographing it. Another vehicle then
21 tailed him down the road attempting to record Complainant #240's license plate.

22 Complainant #240 filed a complaint for voter intimidation with the Arizona
23 Secretary of State. News outlets obtained security camera footage of the interaction which
24 was subsequently posted online. Defendant Jennings and her agents posted about the
25 incident on social media with one of the monitors displaying photos of Complainant
26 #240's car, writing "Mule hunting tonight. This is a mule driving up to the outdoor
27 dropbox." The interaction was highly distressing to Complainant #240 and his wife. He
28

1 is understandably concerned about security after the attacks against him online and has
2 asked for his declaration to be filed under seal to prevent further threats and abuse.

3 On Wednesday, October 19th, 2022, John Evans drove to a drop box in downtown
4 Phoenix, to deliver ballot for himself and his wife. He immediately saw three people
5 monitoring the site with cameras and a tripod and tracking him with their cameras. He
6 found their presence disturbing. After seeing that they were taking pictures of his license
7 plate, he drove up to them and asked them to identify themselves. They refused to do so,
8 only saying that they were monitoring voting irregularities. Evans told them they did not
9 have his permission to photograph but they suggested that the County Recorder had given
10 them permission to be there. Evans checked with County staff who advised they hadn't
11 given this group permission but that they had experienced similar activity in the past, to
12 the point that employees had quit due to feeling intimidated by these groups. County staff
13 informed him that in some instances people from these groups had been brandishing guns
14 outside the voting location.

15 Evans felt like the monitors were harassing him by photographing him and his
16 license plate and that they were intentionally invading his privacy. He filed Complaint
17 #241 with the Secretary of State.

18 On Thursday, October 20th, 2022, Don Overlock drove with his wife to the Mesa
19 Juvenile Court to deposit their ballots. On arrival, he observed five or six men standing
20 around a truck in the second row of parking spaces directly across from the drop box's
21 location. Seeing that they were being monitored, Overlock and his wife went to
22 individually drop off their ballots. They had seen news coverage of people being
23 photographed for dropping off ballots and didn't want to be targeted.

24 Overlock noticed that the men started taking photos of their license plate and car
25 anyway. He confronted them and told him he would report them for voter intimidation
26 and harassment and took photographs of them. The drop box monitors became angry in
27 response. Overlockz reported the incident to the Arizona Secretary of State as Complaint
28 #243. He remains concerned that given how angrily the monitors reacted to being reported

1 for voter intimidation, they might use his license plate to try to find his address to harass
2 him and his wife.

3 On Saturday, October 22, 2022, Daniel Rivera went with his wife to drop off their
4 and their son's ballots at the drop box at the Maricopa Juvenile Court in Mesa. Rivera's
5 son had told him he was too scared to vote himself because he had heard about people
6 surveilling voters at drop boxes in Maricopa County. Rivera told his son he would drop
7 off his ballot for him.

8 At the drop box, Rivera, saw someone holding up a sign stating "I invoke my right
9 to vote" in front of a Range Rover about 35 feet away from the drop box. He could see a
10 man in the vehicle monitoring voters who were dropping off ballots. It also looked like
11 he was writing down information and had a recording device pointed at the drop box.
12 This surveillance from the Range Rover made Rivera and his wife very uncomfortable.
13 Rivera's wife was extremely concerned that the man might be armed and wanted to leave
14 without voting.

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16 immediately after Defendants' agents began conducting surveillance occurring during the
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22 he was writing down information and had a recording device pointed at the drop box.
23 This surveillance from the Range Rover made Rivera and his wife very uncomfortable.
24 Rivera's wife was extremely concerned that the man might be armed and wanted to leave
25 without voting. Rivera convinced his wife to let him drop off their ballots. He contacted
26 the Arizona Secretary of State to file Complaint #248 for voter intimidation.

27 Beyond these declarants, numerous other complaints have been filed with the
28 Secretary of State in response to Defendant's drop box surveillance.

1 Furthermore, Defendant’s surveillance activities have directly impacted the
2 League’s members. Four voters—Leslie Hanson, Lorna Banister, Karen Devine, and Lois
3 Hansen—all became too intimidated by Defendants’ conduct to vote using drop boxes.
4 All are Arizona residents and members of the League, and have voted in past elections.
5 All originally intended to vote at drop boxes. However, after they became aware of
6 Defendants’ intimidating conduct at drop boxes—dressing in tactical gear, watching
7 voters and photographing them, and verbally harassing and accosting voters—they felt
8 intimidated and afraid, and as a result of that intimidation, did not vote by drop box. *See*
9 Decl. of Leslie Hanson; Decl. of Lorna Banister; Decl. of Karen Devine; Decl. of Lois
10 Hansen.

11 LEGAL STANDARD

12 “A plaintiff seeking a preliminary injunction must establish [1] that he is likely to
13 succeed on the merits, [2] that he is likely to suffer irreparable harm in the absence of
14 preliminary relief, [3] that the balance of equities tips in his favor, and [4] that an
15 injunction is in the public interest.” *Winter v. NRDC, Inc.*, 555 U.S. 7, 20 (2008); *see*
16 *Garcia v. Google, Inc.*, 786 F.3d 733, 740 (9th Cir. 2015). “A preliminary injunction may
17 also be appropriate if a movant raises ‘serious questions going to the merits’ and the
18 ‘balance of hardships . . . tips sharply towards’ it, as long as the second and third *Winter*
19 factors are satisfied.” *Disney Enterprises, Inc. v. VidAngel, Inc.*, 869 F.3d 848, 856 (9th
20 Cir. 2017). The same legal standard governs both the issuance of preliminary injunctions
21 and temporary restraining orders. *Stuhlberg Int’l Sales Co., Inc. v. John D. Brush & Co.,*
22 *Inc.*, 240 F.3d 832, 839 n.7 (9th Cir. 2001).

23 As explained below, (1) Plaintiff is likely to succeed on the merits of its claims
24 under Section 11(b) of the Voting Rights Act, 52 U.S.C. § 10307(b), and the Ku Klux
25 Klan Act of 1871, 42 U.S.C. § 1985(3); (2) irreparable harm to Plaintiff, its members, and
26 other voters, will occur in the absence of immediate relief; (3) the balance of equities tips
27 in favor of temporary relief barring Defendants’ actions that intimidate voters; and (4) an
28 injunction barring such unlawful conduct is in the public interest.

1 **ARGUMENT**

2 **I. Plaintiff is likely to succeed on the merits**

3 **A. Plaintiff has standing.**

4 Plaintiff the League of Women Voters of Arizona (the “League”) has sufficiently
5 alleged standing. A plaintiff establishes standing by showing it has “(1) suffered an
6 injury in fact, (2) that is fairly traceable to the challenged conduct of the defendant, and
7 (3) that is likely to be redressed by a favorable judicial decision.” *Spokeo, Inc. v.*
8 *Robins*, 578 U.S. 330, 338 (2016).

9 First, the League has standing to sue on its own behalf. “[A]n organization has
10 direct standing to sue where it establishes that the defendant’s behavior has frustrated its
11 mission and caused it to divert resources in response to that frustration of purpose.”
12 *Sabra v. Maricopa Cnty. Cmty. Coll. Dist.*, 44 F.4th 867, 879–80 (9th Cir. 2022)
13 (citation omitted). The League easily satisfies this standard. The League’s mission is to
14 educate Arizona voters and encourage them to vote by providing Arizona voters with
15 information about their voting options, including options for early voting and voting by
16 mail. Decl. of Pinny Sheoran ¶¶ 8-10. This mission has been frustrated by Defendants’
17 actions, as reports of voter surveillance, intimidation, and harassment has curtailed
18 voters’ willingness to participate in the democratic process. *Id.* ¶ 11. Defendants’
19 actions have also caused the League to divert resources in response, including by
20 expending staff time and money and by repurposing its existing phone banking
21 program. *Id.* ¶¶ 14-20.

22 The League has also established associational standing on behalf of its members.
23 To establish associational standing, a plaintiff “must demonstrate that (a) its members
24 would otherwise have standing to sue in their own right; (b) the interests it seeks to
25 vindicate are germane to the organization’s purpose; and (c) neither the claim asserted
26 nor the relief requested requires the participation of individual members in the lawsuit.”
27 *Smith v. Pac. Prop. & Dev. Corp.*, 358 F.3d at 1101–02 (quoting *Hunt v. Wash. State*
28 *Apple Advertising Comm’n*, 432 U.S. 333, 343 (1977)). The League is a membership

1 organization with 900 members statewide, the vast majority of whom use early voting,
2 including drop box voting. Sheoran Decl. ¶ 7. At least three of those members have
3 changed their plans to vote by drop box because of Defendants' actions to intimidate
4 voters at dropboxes. Devine Decl. ¶¶ 7-8, Banister Decl. ¶¶ 5-7, Hanson Decl. ¶¶ 5-6.
5 Losing access to a particular voting method is an injury sufficient to establish standing
6 for the individual and for an association of which that individual is a member. *See Dem.*
7 *Nat'l Comm. v. Reagan*, 329 F. Supp. 3d 824, 841 (D. Ariz. 2018), *rev'd on other*
8 *grounds, Dem. Nat'l Comm. v. Hobbs*, 948 F.3d 989 (9th Cir. 2020) (en banc).

9 **B. Plaintiff is likely to show that Defendants have violated Section 11(b)**
10 **of the Voting Rights Act**

11 Plaintiff is likely to prevail on its claim that Defendants have violated Section
12 11(b) of the Voting Rights Act, 52 U.S.C. § 10307(b). That statute provides in relevant
13 part: “No person, whether acting under color of law or otherwise, shall intimidate,
14 threaten, or coerce, or attempt to intimidate, threaten, or coerce any person for voting or
15 attempting to vote.” 52 U.S.C. § 10307(b) (formerly 42 U.S.C. § 1973i(b)).²

16 To prove a claim under Section 11(b), Plaintiff must demonstrate that Defendants
17 have intimidated, threatened, or coerced (or attempted to intimidate, threaten, or coerce)
18 a voter or someone assisting a voter. *See Nat'l Coal. on Black Civic Participation v. Wohl*,
19 498 F. Supp. 3d 457, 477 (S.D.N.Y. 2020) (“*Wohl I*”). The question is whether voters are
20 intimidated, threatened, or coerced in any fashion. *See Dougherty County v. United States*,
21 439 U.S. 32, 50 n.4 (1978) (through Section 11, “Congress imposed an unlimited
22 proscription on activities affecting the voting rights of others.”).

23 ***Defendants' conduct is objectively intimidating.*** The operative words of the
24 statute—“intimidate,” “threaten,” and “coerce,” or attempt to do so—should be given
25 their plain meaning. *Leocal v. Ashcroft*, 543 U.S. 1, 8-9 (2004); *CISPES v. FBI*, 770 F.2d
26

27 ² Section 11(b) affords a private right of action. *See Allen v. State Bd. of Elections*, 393
28 U.S. 544, 555-56 & n.18 (1969); *Gray v. Main*, 291 F. Supp. 998, 999-1000 (M.D. Ala.
1966); *see also* 28 U.S.C. § 1343(a)(4).

1 468, 476-77 & n.8 (5th Cir. 1985) (analogizing the statutory text at issue to Section 11(b)
 2 because it contains terms “obviously widely used and commonly understood in statutory
 3 contexts”).³ Merriam Webster defines “intimidate” as “to make timid or fearful”; “to
 4 compel or deter by or as if by threats.” It defines “threaten” as “to utter threats against,”
 5 “to hang over dangerously,” or “to cause to feel insecure or anxious.” And it defines
 6 “coerce” as “to restrain or dominate by force,” “to compel to an act or choice,” or “to
 7 achieve by force or threat.”⁴ The 1966 edition of Webster’s dictionary—nearly
 8 contemporaneous with the passage of Section 11(b)—defines “intimidation” as “to make
 9 timid and fearful” or to “inspire or affect with fear.” Webster’s New International
 10 Dictionary 1184 (3d ed. 1966). Thus, the text’s reach is broad, prohibiting voter
 11 intimidation in all its forms.

12 No physical violence or threat of physical violence is required to constitute
 13 intimidation. The text itself makes that plain: if “threats” were required for intimidation,
 14 that would render the words “threaten” and “intimidate” redundant. *See Bailey v. United*
 15 *States*, 516 U.S. 137, 146 (1995) (“We assume that Congress used two terms because it
 16 intended each term to have a particular, nonsuperfluous meaning.”). Thus, courts have
 17 explicitly held that Section 11(b) does not require any physical violence. *See, e.g., New*
 18 *York v. Horelick*, 424 F.2d 697, 700 (2d Cir. 1970) (Friendly, J.) (contrasting the Voting
 19 Rights Act to another provision of federal law that the court found applied only to “violent
 20 activity”); *Wohl I*, 498 F. Supp. 3d at 477; *League of United Latin Am. Citizens –*
 21 *Richmond Region Council 4614 v. Pub. Interest Legal Found.*, No. 18-cv-00423, 2018
 22 WL 3848404, at *4 (E.D. Va. Aug 13, 2018) (“LULAC”).⁵ The Department of Justice has

23 _____
 24 ³ *See also United States v. Shrader*, 675 F.3d 300, 310 (4th Cir.2012) (“ ‘Harass’ and
 25 ‘intimidate’ are not obscure words.”)

26 ⁴ [https://www.merriam-](https://www.merriam-webster.com/dictionary/intimidate#:~:text=transitive%20verb,tried%20to%20intimidate%20a%20witness)
 27 [webster.com/dictionary/intimidate#:~:text=transitive%20verb,tried%20to%20intimidate](https://www.merriam-webster.com/dictionary/intimidate#:~:text=transitive%20verb,tried%20to%20intimidate%20a%20witness)
 28 [%20a%20witness](https://www.merriam-webster.com/dictionary/intimidate#:~:text=transitive%20verb,tried%20to%20intimidate%20a%20witness) (intimidate); <https://www.merriam-webster.com/dictionary/threaten>
 (threaten); <https://www.merriam-webster.com/dictionary/coerce> (coerce).

⁵ Additionally, numerous courts have held conduct that does not include violence or
 threats of violence to be unlawful voter intimidation under Section 11(b) or similar laws

1 taken the same position. *See* DOJ brief in *Wohl*, No. 20-cv-08668-VM-OTW, ECF No.
2 235 at 4-12. In statutes outside the context of voting, Courts have also interpreted the
3 word “intimidation” to include non-violent actions. *See United States v. Gartman*, 1995
4 WL 265925, at *4 (4th Cir. May 9, 1995) (per curiam).

5 Defendants’ conduct is undoubtedly intimidating to voters. The drop box
6 monitors’ actions closely parallel conduct that courts have held constitute illegal voter
7 intimidation in the past. For example, in *Daschle v. Thune*, Senator Daschle challenged
8 conduct committed by supporters of his opponent as violating Section 11(b), namely:
9 “[f]ollowing Native American voters at [a] polling place . . . and standing two to three
10 feet behind Native American voters, and ostentatiously making notes”; “[f]ollowing
11 Native American voters out to their cars after they have voted, walking up to their
12 vehicles, and writing down their license plate numbers”; and “[h]aving a loud
13 conversation in a polling place, where Native Americans were voting, about Native
14 Americans who were prosecuted for voting illegally in Minnesota.” *Daschle v. Thune*,
15 Complaint at 5-6, No. 04-cv-4177 (D.S.D. Nov. 1, 2004)). The district court granted a
16 temporary restraining order and enjoining all “Defendant John Doe’s acting on behalf of
17 [Thune]” from “following Native Americans from the polling places” and copy[ing] the
18 license plates of Native Americans” driving to and from polling places. *Id.*

19 Defendants have directed their agents to engage in nearly identical conduct to that
20 enjoined in *Daschle*. As the voters’ declarations demonstrate, drop box monitors are
21 conspicuously filming and photographing voters and recording their license plate
22 numbers. Each of the voters testified that they felt harassed by this surveillance. In some
23 cases drop box monitors stalked voters and followed them very closely. The experience
24 of Complainant #240 is a stark and harrowing example of voter intimidation. This voter
25 sought to avoid revealing personally identifying information upon seeing an unnerving

26 such as Section 131(b) or equivalent state voter intimidation laws. *See, e.g., LULAC*,
27 2018 WL 3848404, at *4 (defamation and doxxing are intimidation); *Consent Decree*,
28 *United States v. N.C. Republican Party*, 92-161-CIV-5-F (E.D.N.C. Feb. 27, 1992)
(mailings with false election information and warning of prosecution are intimidation).

1 group of individuals poised to videotape and photograph him. For the offense of trying to
2 protect the voter’s privacy, Defendant’s agents stalked and harassed Complainant #240
3 telling him they were “hunting mules.” This is a pointed, unambiguous threat directed at
4 a lawful voter. It is the definition of voter intimidation.

5 Defendants speciously claim that their sole purpose is to detect unlawful voter
6 fraud. Even if that were true—and it is not— Defendant’s surveillance campaign forces
7 voters into an untenable Catch-22: either (1) disclose identifying information, such as a
8 license plate number, to Defendants’ agents who have a stated intention and demonstrated
9 history of doxxing individuals who have voted lawfully, or (2) try to avoid disclosing
10 identifying information to Defendants’ agents and be attacked for being a “mule” and
11 having something to hide. The Voting Rights Act prohibits Americans from being put to
12 such a test.

13 Standing alone, Defendants’ actions constitute textbook voter intimidation under
14 settled law, but Defendants’ conduct has been far more threatening. After authorities
15 received complaints by voters about being surveilled at the Mesa drop box, Defendants’
16 agents responded on Friday, October 21, by showing up carrying firearms while wearing
17 masks, body armor, and tactical gear. *See* Homer Decl., Ex. V. Defendant Jennings
18 tweeted that the individuals were “our people” and sanctioned surveillance of voting
19 locations by armed, masked monitors in tactical gear. *Id.* Defendant Arroyo likewise
20 made clear in his planning sessions with drop box monitors that they could be armed
21 while conducting surveillance, and he urged them to wear Oathkeeper gear. *Id.*, Ex. I.

22 Any reasonable observer would view the prospect of voting under the surveillance
23 of armed, masked individuals wearing tactical gear as quintessentially intimidating. Such
24 conduct constitutes a barely veiled threat of violence—both from Defendants’
25 themselves, and from others incited by Defendants’ conduct. This action thus violates the
26 prohibition on efforts to “threaten” as well as to “intimidate” voters. *See Wohl I*, 498 F.
27 Supp. 3d at 483.

28

1 The implied threat is increased even further given Defendants’ stated intention to
2 dox voters they suspect (without basis) of voting illegally. *See* Homer Decl., Ex. L. Every
3 complainant testified that they were deeply concerned that drop box monitors would use
4 photos of their faces and license plates to identify, dox, and harass them. That fear is
5 eminently reasonable, considering the use of that tactic by proponents of the 2000 mules
6 conspiracy theory. A reasonable voter would understand that the recording of their face
7 and license plate would present an immediate risk that their identity would be publicized
8 online alongside false accusations that they committed voter fraud, leading to threats of
9 violence against them. Courts have recognized that publishing a victim’s personal
10 information alongside accusations of illegal voting can constitute harassment. *See*
11 *LULAC*, 2018 WL 3848404, at *4; *see also King v. Cook*, 298 F. Supp. 584, 587 (N.D.
12 Miss. 1969) (“Reticence to apply for registration might have been intensified . . . by
13 publication in the local newspaper of the names and addresses of all applying for
14 registration[.]”); *Original Knights of the KKK*, 250 F. Supp. at 342 (describing
15 intimidating handbills posted to identify specific individuals and businesses that the KKK
16 was targeting).

17 Furthermore, numerous courts have also held that baselessly accusing voters of
18 violating the law, or warning of legal or other consequences for voting, is a well-
19 recognized form of unlawful voter intimidation. *See, e.g., Nguyen*, 673 F.3d at 1264-66
20 (letters sent to Hispanic voters warning of incarceration or deportation could have
21 “constituted a tactic of intimidation” under state voter intimidation law); *Nat’l Coal. on*
22 *Black Civic Participation v. Wohl*, 512 F. Supp. 3d 500, 509-11 (S.D.N.Y. 2021) 509-11
23 (*Wohl II*) (collecting cases); *McLeod*, 385 F.2d at 740-74 (“baseless arrests and
24 prosecutions”); *see United States v. Wood*, 295 F.2d 772, 781-82 (5th Cir. 1961) (arrests
25 of voting rights organizers); *United States v. Clark*, 249 F. Supp. 720, 728 (S.D. Ala.
26 1965) (similar); *Olagues*, 797 F.2d at 1522 (investigations of voters who requested
27 bilingual ballots); *People Helpers, Inc. v. City of Richmond*, 789 F. Supp. 725 (E.D. Va.
28 1992) (excessive investigations by a city rental agency); *LULAC*, 2018 WL 3848404, at

1 *4 (publishing voters’ names and personal information with allegations of felonious voter
2 registration “in a clear effort to subject the named individuals to public opprobrium.”).
3 Defendant’s demonstrated history of baselessly accusing voters of being “mules” runs
4 directly afoul of this settled precedent.

5 ***Section 11(b) reaches private parties.*** The plain language of the statute reaches
6 conduct by individuals “whether acting under color of law *or otherwise*” 52 U.S.C.
7 § 10307(b) (emphasis added). Section 11(b) “on its face prohibits *any* intimidation, threat,
8 or coercion, whether done by a public official or by a private individual.” *Whatley v.*
9 *Vidalia*, 399 F.2d 521, 526 (5th Cir. 1968). It is evident from the text that “the language
10 ‘or otherwise’ indicates Congressional intent to reach both government and private
11 conduct under § 11(b).” *LULAC*, 2018 WL 3848404, at *3; *Wohl I*, 498 F. Supp. 3d at
12 476 (“Section 11(b) undoubtedly applies to private conduct, and private individuals are
13 subject to its prohibitions).

14 ***Section 11(b) does not require any showing of racial animus.*** The text of Section
15 11(b) states that “[n]o person . . . shall intimidate, threaten, or coerce or attempt to
16 intimidate, threaten or coerce any person for voting or attempting to vote.” 52 U.S.C. §
17 10307(b). This language does not include any racial animus requirement, nor is there any
18 basis for reading in any such extra-textual requirement. As the House Report
19 accompanying the Voting Rights Act explained, “[t]he prohibited acts of intimidation
20 need not be racially motivated.” H.R. Rep. No. 89-439, at 30 (1965) *as reprinted in* 1965
21 U.S.C.C.A.N. 2437, 2462. Numerous courts have so held. *See, e.g., LULAC*, 2018 WL
22 3848404, at *4 (no showing “of specific intent or racial animus is required” when bringing
23 a claim under Section 11(b)); *Wohl I*, 498 F. Supp. 3d at 476-77 (“A plaintiff need not
24 show racial animus or discrimination to establish a violation of Section 11(b)”);
25 *Willingham v. County of Albany*, 593 F. Supp. 2d 446, 462 (N.D.N.Y. 2006) (“While the
26 purpose of the VRA was to eliminate racial discrimination in voting, [Section] 11(b) of
27 the act does not explicitly require proof that racial discrimination motivated the
28 intimidation, threats, or coercion.”)

1 **Section 11(b) does not require any showing of subjective intent.** Section 11(b)
2 was specifically written to *exclude* any intent requirement. Section 11(b) is a modification
3 of an earlier provision, Section 131(b) of the Civil Rights Act of 1957, which states: “No
4 person, whether acting under color of law or otherwise, shall intimidate, threaten, coerce,
5 or attempt to intimidate, threaten, or coerce any other person *for the purpose of*
6 interfering” with the right to vote. 52 U.S.C. § 10101(b) (emphasis added). Section 11(b)
7 is identical, except it omits the phrase “for the purpose of”—thus making it abundantly
8 clear that Section 11(b) explicitly *excludes* a subjective intent requirement.

9 The legislative history confirms what the text makes plain: that Congress
10 intentionally declined to incorporate a *mens rea* requirement into Section 11(b). As then-
11 Attorney General Nicholas Katzenbach explained, excluding a *mens rea* requirement was
12 necessary to combat nefarious activity difficult to reach under older voting rights statutes:
13 “Since many types of intimidation, particularly economic intimidation, involve subtle
14 forms of pressure, this treatment of the purpose requirement [in Section 131(b)] has
15 rendered the statute largely ineffective.”⁶ Thus, “no subjective ‘purpose’ need be shown
16 . . . in order to prove intimidation under [Section 11(b)]. Rather, defendants would be
17 deemed to intend the natural consequences of their acts.” *Id.* The House Report
18 accompanying the Voting Rights Act echoes Katzenbach, stating that under Section
19 11(b), “no subjective purpose or intent need be shown.” H.R. Rep. No. 89-439, at 30
20 (1965), *as reprinted in* 1965 U.S.C.C.A.N. 2437.

21 This is why numerous courts have interpreted the plain language to not require any
22 showing of subjective intent. *See, e.g., Ariz. Democratic Party v. Ariz. Republican Party*,
23 No. 16-3752, 2016 WL 8669978, at *4 n.3 (D. Ariz. Nov. 4, 2016) (“[T]he plain language
24 of the statute does not require a particular *mens rea*.”); *LULAC*, 2018 WL 3848404, at *4
25 (“The text of § 11(b), unlike § 131(b), plainly omits ‘for the purpose of,’ suggesting §
26

27 ⁶Hearing on the Voting Rights Act of 1965 Before the H. Comm. on the Judiciary, 89th
28 Cong. 12 (1965) (statement of Nicholas Katzenbach, Att’y Gen. of the United States),
<https://www.justice.gov/sites/default/files/ag/legacy/2011/08/23/03-18-1965.pdf>.

1 11(b)'s deliberately unqualified reach."); *Daschle v. Thune*, No. 4:04-cv-4177, ECF No.
2 6, at *2 (D.S.D. Nov. 1, 2004) ("Whether the intimidation was intended or simply the
3 result of excessive zeal is not the issue, as the result was the intimidation of prospective
4 Native American voters."); *see also United States v. Clark*, 249 F. Supp. 720, 728 (S.D.
5 Ala. 1965) (concluding that the "inevitable effect" of challenged conduct would be to
6 deter voters).

7 However, since courts often look to Section 131(b) when applying Section 11(b),⁷
8 some courts have erroneously imported the *mens rea* requirement into Section 11(b). *See*,
9 *e.g., Willingham v. Cty. of Albany*, 593 F. Supp. 2d 446, 462 (N.D.N.Y. 2006).

10 In a since-vacated opinion, *Olagues v. Russoniello*, 797 F.2d 1511, 1522 (9th Cir.
11 1986) (en banc), the Ninth Circuit made this initial error. There, the Court considered a
12 claim under 52 U.S.C. § 10303(f)(2) (then 42 U.S.C. § 1973b(f)(2)), which did explicitly
13 include a *mens rea* requirement, and then assumed without any analysis that 52 U.S.C. §
14 10307(b) (then, 42 U.S.C. § 1973i(b)) also included a *mens rea* requirement. *Olagues* was
15 vacated on other grounds and thus is no longer binding on this Court. *Russoniello v.*
16 *Olagues*, 484 U.S. 806 (1987) (vacating and remanding). This Court should not extend
17 *Olagues*'s now-vacated error, and should instead apply the plain text of the statute.

18 In any event, this Court need not decide at this preliminary stage whether Section
19 11(b) requires a showing of subjective intent, because the evidence demonstrates both
20 that Defendants' conduct is objectively intimidating to a reasonable voter *and* that
21 Defendants' subjective intention was to intimidate voters. *See* Homer Decl, Ex. L
22 (Defendant Jennings's Truth Social post asserting that "ballot trafficking mules are about
23 to be completely doxxed and put on blast"). Thus, under either standard, Plaintiff is likely
24 to prevail.

25 _____
26 ⁷ Which is appropriate, to the extent the statutory text is identical, such as in the use of
27 the phrase "intimidate, threaten, or coerce." *See Smith v. City of Jackson*, 544 U.S. 228,
28 233 (2005) ("[W]hen Congress uses the same language in two statutes having similar
purposes . . . it is appropriate to presume that Congress intended that text to have the
same meaning in both statutes").

1 **C. Plaintiff is likely to prevail on its claim under the Ku Klux Klan Act,**
 2 **42 U.S.C. § 1985(3).**

3 Plaintiff is likely to prevail on its claim that Defendants have violated the Ku Klux
 4 Klan Act of 1871 (the “Klan Act”).

5 *The elements of a § 1985(3) clauses 3 and 4 claim.* Four clauses of what was once
 6 Section 2 of the Klan Act are now codified in 42 U.S.C. § 1985(3). Clauses 1 and 2 of
 7 Section 2 incorporate the concept of Equal Protection from the Fourteenth Amendment
 8 and are known as the “equal protection clauses”; clauses 3 and 4 do not—instead, these
 9 are the “support or advocacy” clauses, and they protect a citizen’s right to support or
 10 advocate for federal electoral candidates. Section 1985(3) provides:

11 If two or more persons in any State or Territory conspire . . .
 12 [1] for the purpose of depriving, either directly or indirectly, any person or
 13 class of persons of the equal protection of the laws, or of equal privileges
 14 and immunities under the laws; or

15 [2] for the purpose of preventing or hindering the constituted authorities of
 16 any State or Territory from giving or securing to all persons within such
 17 State or Territory the equal protection of the laws;

18 **or if two or more persons conspire**

19 **[3] to prevent by force, intimidation, or threat, any citizen who is**
 20 **lawfully entitled to vote, from giving his support or advocacy in a legal**
 21 **manner, toward or in favor of the election of any lawfully qualified**
 22 **person as an elector for President or Vice President, or as a Member of**
 23 **Congress of the United States; or**

24 **[4] to injure any citizen in person or property on account of such**
 25 **support or advocacy. . .**

26 the party so injured or deprived may have an action for the recovery of damages .
 27 . . against any one or more of the conspirators.

28 42 U.S.C. § 1985(3) (emphasis, brackets, and line breaks added).

 To prove a claim under clauses 3 and 4 of § 1985(3), a plaintiff must allege and
 prove four elements: (1) a conspiracy; (2) either to prevent a lawful voter from supporting
 a candidate in a federal election by force, intimidation, or threat; or to injure a lawful
 voter in person or in property for such support; (3) an act in furtherance of the conspiracy;

1 and (4) injury. *Wohl I*, 498 F. Supp. 3d at 487; *Ariz. Democratic Party*, 2016 WL
2 8669978, at *5; *LULAC*, 2018 WL 3848404, at *5-6 (E.D. Va. 2018).

3 This is distinct from claims under clauses 1 and 2 of § 1985(3) (known as the
4 “equal protection clauses”), which typically require a showing of an equal protection
5 violation. As the Supreme Court explained in *Kush v. Rutledge*, it is improper to import
6 equal protection elements into the clauses of Section 1985 that proscribe conspiracies to
7 interfere with federal functions that do not contain the equal protection language. 460
8 U.S. 719, 725 (1983) (explaining that “there is no suggestion” that the equal protection
9 language should apply to “any other portions of § 1985”)⁸; *Bray v. Alexandria Women’s*
10 *Health Clinic*, 506 U.S. 263, 267 n.13 (1993) (noting the centrality of the equal protection
11 language to *Kush’s* holding); *McCord v. Bailey*, 636 F.2d 606, 614 & n.12 (D.C. Cir.
12 1980) (holding that no showing of class-based animus is required where the text “does
13 not demand a denial of ‘equal protection of the laws’”); *Wohl I*, 498 F. Supp. 3d at 487.
14 Thus, there cannot be a class-based animus requirement for the “support or advocacy”
15 clauses for the simple reason that the clauses lack the statutory text that gives rise to that
16 requirement.⁹

17
18 ⁸ See also *Arizona Democratic Party*, 2016 WL 8669978, at *5 n.4. (“the plain language
19 of the statute does not require” any racial animus showing, but “[t]he Court need not
20 read into the statute a racial animus requirement to resolve Plaintiff’s Motion”).

21 ⁹ Some courts have failed to properly distinguish between the “equal protection” clauses
22 and the “support or advocacy” clauses, and erroneously concluded that the “support or
23 advocacy” clauses are remedial and simply enforce the First Amendment (in the same
24 way that the “equal protection” clauses are remedial to enforce the Fourteenth
25 Amendment and rights found elsewhere). See *Federer v. Gephardt*, 363 F.3d 754, 760
26 (8th Cir. 2004). Those cases are wrongly decided. Not only do they make clauses 3 and
27 4 redundant with clauses 1 and 2—which courts should not do, see *Bailey*, 516 U.S. at
28 146—but also because they rely on an anachronism. When the Klan Act was passed in
1871, First Amendment rights could only be asserted against the *federal* government. It
wasn’t until a half-century later that the Supreme Court held that the First Amendment
applied to state governments as well. See *Stromberg v. California*, 283 U.S. 359 (1931)
(incorporating the First Amendment’s free speech clause against the states). Thus, if
cases like *Federer* are correct, then the “support or advocacy” clauses of the Klan Act
would not have provided a remedy against Nathan Bedford Forrest (the first Grand
Wizard of the Klan), thus defeating the key purpose of the Act—to provide a legal

1 ***Defendants have conspired and undertaken acts in furtherance of that***
2 ***conspiracy.*** Plaintiff is likely to succeed on the merits of its claim that Defendants have
3 engaged in a conspiracy. A conspiracy is “an agreement . . . to do an unlawful act . . .
4 between or among two or more” persons. *Ziglar v. Abbasi*, 137 S. Ct. 1843, 1867 (2017).

5 As the Ninth Circuit has explained:

6 To be liable, each participant in the conspiracy need not know the exact
7 details of the plan, but each participant must at least share the common
8 objective of the conspiracy. A defendant’s knowledge of and participation
in a conspiracy may be inferred from circumstantial evidence and from
evidence of the defendant’s actions.

9 *Lacey v. Maricopa Cty.*, 693 F.3d 896, 935 (9th Cir. 2012).

10 Plaintiff is likely to prove that Defendants agreed, tacitly or explicitly, on a
11 “common objective”: to surveil drop boxes, deter voters from using drop boxes, and
12 intimidate voters. Indeed, Defendants statements and actions. detailed above show that
13 they intentionally and explicitly agreed on a common objective—and did so explicitly,
14 on their websites, social media pages, and other public statements. The objective was
15 explicit: to drive off “mules,” in other words, to intimidate voters. Defendants in fact have
16 already undertaken that activity by: them and their agents appearing at drop boxes (at
17 times with weapons, body armor, and cameras), verbally harrassed voters, photographed
18 voters, and posted those photographs online.

19 ***The purpose of Defendants’ conspiracy was to intimidate voters.*** Plaintiffs will
20 likely prove that Defendants’ conspiracy is directed at preventing lawful voters from
21 voting “by force, intimidation, or threat,” or injuring them for exercising the franchise.

22
23 _____
24 remedy against the Klan. Cases from near the time that the Klan Act was passed
25 confirm that the Act created causes of action against defendants other than federal
26 officials. *See Goldman*, 25 F. Cas. at 1351-53 (Reconstruction-era case recognizing a
27 properly alleged claim under the criminal equivalent of what is now Section 1985(3)
28 clause 3, with no examination of whether the defendant was a federal officer and
observing that the right to provide “support or advocacy” under the statute is broader
than merely the act of voting). *See also* Richard Primus & Cameron O. Kistler, *The*
Support-or-Advocacy Clauses, 89 Fordham L. Rev. 145, 157 (2020); Note, *The Support*
or Advocacy Clause of § 1985(3), 133 Harv. L. Rev. 1382, 1399-1400 (2020).

1 As detailed above, Defendants have directly stated—indeed celebrated—that their purpose
2 is to deter voter fraud in drop boxes. At the same time, they automatically target voters as
3 “mules” for dropping off more than one ballot—making no allowance for the fact that
4 Arizona law expressly permits individuals to assist, *e.g.*, family and household members
5 by depositing their ballots. Thus, Defendant’s conduct is not aimed at voter fraud or
6 illegal conduct—it is aimed at discouraging lawful voting using a method that they
7 disapprove of. The purpose is intimidation.

8 Finally, Plaintiff and its members have been injured, as detailed above, *see supra*
9 Part I.A.

10 **II. Plaintiffs will be irreparably harmed absent immediate relief**

11 There are “no do-overs in elections.” *League of Women Voters of N.C.*, 769 F.3d
12 at 247. For that reason, intimidation efforts that deter eligible voters from voting, like
13 those that Defendants are currently undertaking and will continue to undertake absent
14 injunctive relief, cause irreparable harm. Indeed, “when an alleged constitutional right is
15 involved,” such as the right to vote, “most courts hold that no further showing of
16 irreparable injury is necessary.” *Fish v. Kobach*, 840 F.3d 710, 752 (10th Cir. 2016). As
17 this circuit has explained, “it is well established that deprivation of constitutional rights
18 unquestionably constitutes irreparable injury.” *Melendres v. Arpaio*, 695 F.3d 990, 1002
19 (9th Cir. 2012) (internal quotation marks omitted).

20 Because there is no “redress of a denial of the right to vote after an election, denial
21 of that right weighs heavily in determining whether plaintiffs would be irreparably
22 harmed absent an injunction.” *Fish*, 840 F.3d at 752; *see also Veasey v. Abbott*, 870 F.3d
23 387, 394 (5th Cir. 2017) (because the challenged actions “affect—or threaten to affect—
24 the plaintiffs’ right to vote . . . [they] have shown they will suffer an irreparable injury”);
25 *Tex. League of United Latin Am. Citizens v. Abbott*, 2020 WL 5995969, at *22 (W.D.
26 Tex. Oct. 9, 2020) (“We have already determined that the fundamental right to vote is
27 likely either threatened or in fact being impaired, on the eve of an election, and this
28

1 conclusion mandates a finding of irreparable injury.”)¹⁰ In the absence of preliminary
2 relief, Defendants’ voter intimidation scheme already has and likely will continue to cause
3 irreparable harm to voters’ ability to exercise the franchise, including Plaintiff’s members,
4 and to Plaintiff by forcing it to divert resources to respond to Defendants’ actions.

5 **III. The balance of equities and public interest favor Plaintiff**

6 The final two factors—the balance of equities and the public interest—both favor
7 Plaintiff. Preventing voter intimidation is a critical public interest enshrined in federal
8 law. “[V]oter intimidation and coercion [are] . . . obvious harm[s] that federal law strongly
9 and properly prohibits.” *United States v. Madden*, 403 F.3d 347, 352 (6th Cir. 2005)
10 (Boggs, C.J., concurring in part and dissenting in part). Indeed, the constitutional interest
11 at stake in this litigation is the voters’ “most precious” “right . . . to cast their votes
12 effectively” and free of intimidation. *Williams v. Rhodes*, 393 U.S. 23, 30-31 (1968). The
13 interest in “protecting voters from confusion and undue influence” is “compelling,”
14 *Burson v. Freeman*, 504 U.S. 191, 199 (1992) (plurality opinion of Blackmun, J.).

15 The weight of this interest is substantial in balancing the equities. *Council of*
16 *Alternative Political Parties v. Hooks*, 121 F.3d 876, 883-34 (3d Cir. 1997) (“[i]n the
17 absence of legitimate, countervailing concerns, the public interest clearly favors the
18 protection of constitutional rights, including the voting and associational rights of” voters
19 and candidates.); *League of Women Voters*, 769 F.3d at 247 (“By definition, [t]he public
20 interest . . . favors permitting as many qualified voters to vote as possible.”); *Purcell v.*
21 *Gonzalez*, 549 U.S. 1, 4 (2006) (the public has a “strong interest in exercising the

22
23 ¹⁰ See also *Obama for Am. v. Husted*, 697 F.3d 423, 436 (6th Cir. 2012) (“A restriction
24 on the fundamental right to vote . . . constitutes irreparable injury.”); *Council of*
25 *Alternative Political Parties v. Hooks*, 121 F.3d 876, 883 (3d Cir. 1997) (“voting and
26 associational rights . . . cannot be alleviated after the election.”); *Williams v. Salerno*,
27 792 F.2d 323, 326 (2d Cir. 1986) (“The registration applicants in this case would
28 certainly suffer irreparable harm if their right to vote were impinged upon.”); *Cf. Elrod*
v. Burns, 427 U.S. 347, 374 & n.29 (1976) (“The loss of First Amendment freedoms, for
even minimal periods of time, unquestionably constitutes irreparable injury” because
“[t]he timeliness of political speech is particularly important”).

1 fundamental political right to vote”) (internal quotation marks omitted); *Husted*, 697 F.3d
2 at 437 (“That interest is best served by favoring enfranchisement and ensuring that
3 qualified voters’ exercise of their right to vote is successful.”); *Wash. Ass’n of Churches*
4 *v. Reed*, 492 F. Supp. 2d 1264, 1271 (W.D. Wash. 2006) (“the public interest weighs
5 strongly in favor of letting every eligible resident of Washington register and cast a vote”).

6 For all of these reasons, the balance of equities and the public interest would be
7 advanced by the temporary restraining order and preliminary injunction sought here.
8 Defendants cannot be permitted to engage in conduct that threatens the most basic right
9 in American democracy—the right of voters to cast their votes free of coercion and
10 intimidation. “[O]ther rights, even the most basic, are illusory if the right to vote is
11 undermined.” *Wesberry v. Sanders*, 376 U.S. 1, 17 (1964).

12 **IV. The Proposed Injunction Raises No Constitutional Concerns**

13 **A. Enjoining Voter Intimidation Is Consistent with the First Amendment**

14 **1. Defendants’ conspiracy to intimidate voters is not protected 15 speech**

16 *True Threats.* The surveillance by Defendants’ agents carrying weapons, many
17 of whom are wearing body armor and tactical gear, in combination with publicly
18 accusing voters of voter fraud amount to “[i]ntimidation in the constitutionally
19 proscribable sense of the word” because it contains a “threat to a person or group of
20 persons with the intent of placing the victim in fear of bodily harm,” *Virginia v. Black*,
21 538 U.S. 343, 360 (2003). Moreover, as explained above, the threat of “doxxing” voters
22 along with accusations of felonious conduct and knowledge that this will almost
23 certainly lead to violent threats online, is a true threat. *See LULAC*, 2018 WL 3848404,
24 at *4. Courts have long recognized that publicizing voter information (even technically
25 public information, such as their names), along with accusations of crimes or the
26 implication the wrong people are voting, predictably and foreseeably leading to threats
27 against those voters, is a form of threat and intimidation. *See King v. Cook*, 298 F. Supp.
28 584, 587 (N.D. Miss. 1969); *Original Knights of the KKK*, 250 F. Supp. at 342; *see also*

1 *Wohl II*, 512 F. Supp. 3d 500, 513 (S.D.N.Y. 2021) (noting that a threatened injury need
2 not be physical or violent to constitute a “true threat” and that the prohibition on true
3 threats “protect[s] individuals from the fear of violence and the disruption that fear
4 engenders, as well as from the possibility that the threatened violence will occur”);
5 *United States v. Carmichael*, 326 F. Supp. 2d 1267, 1281 (M.D. Ala.) (a true threat is
6 determined by “the language itself”; the “context”; “the testimony of the recipient”
7 ((citing *Watts v. United States*, 394 U.S. 705, 708 (1969))).

8 **2. Enjoining An Unlawful Conspiracy Is Consistent With the** 9 **First Amendment.**

10 “[I]t has never been deemed an abridgement of freedom of speech or press to
11 make a course of conduct illegal merely because the conduct was in part initiated,
12 evidenced, or carried out by means of language, either spoken, written, or printed.”
13 *Rumsfeld v. Forum for Acad. & Institutional Rts.*, 547 U.S. 47, 62 (2006) (quoting
14 *Giboney v. Empire Storage & Ice Co.*, 336 U.S. 490, 502 (1949)). Thus, “[i]t rarely has
15 been suggested that the constitutional freedom for speech . . . extends its immunity to
16 speech or writing used as an integral part of conduct in violation of a valid criminal
17 statute.” *New York v. Ferber*, 458 U.S. 747, 761–62 (1982) (quoting *Giboney*, 336 U.S.
18 at 498). The exception applies not only to speech integral to proscribed criminal conduct
19 but also to speech integral to civilly actionable conduct. *See Rumsfeld*, 547 U.S. at 62.
20 An injunction halting Defendants’ unlawful course of conduct¹¹ does not violate the
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24 ¹¹ Even if Defendants’ actions were not part of an unlawful conspiracy, they are better
25 understood as conduct rather than speech. “Words can in some circumstances violate
26 laws directed not against speech but against conduct” *R.A.V. v. City of St. Paul, Minn.*,
27 505 U.S. 377, 389 (1992). Any “incidental[]” burden on speech due to an injunction
28 “directed at the conduct rather than the speech” is permissible. *See id.* at 389. But the
Court need not decide this issue, because Defendants’ actions are explicitly also part of
a conspiracy, which of course the Court can enjoin.

1 First Amendment, because Defendants’ actions are all part of unlawful conspiracies to
2 intimidate voters, in violation of Section 11(b) and Section 1985(3).¹²

3 **3. The proposed order would survive even strict scrutiny**

4 Because there is “such a compelling interest in securing the right to vote freely
5 and effectively,” the Supreme Court has never required that regulations of voting aimed
6 at guarding against voter intimidation be “perfectly tailored.” *Burson v. Freeman*, 504
7 U.S. 191, 199, 208-09 (1992). Instead, the Supreme Court and lower courts have
8 regularly issued or upheld common-sense protections against voter intimidation and
9 interference as passing constitutional muster. *See, e.g., id.* at 198–211 (upholding buffer
10 zone on electioneering communications); *Firestone v. News-Press Pub. Co.*, 538 So. 2d
11 457 (Fla. 1989) (upholding restriction on photographing in polling places); *Ohio*
12 *Democratic Party v. Ohio Republican Party*, No. 16-CV-02645, 2016 WL 6542486, at
13 *2 (N.D. Ohio Nov. 4, 2016) (entering injunction prohibiting unauthorized pollwatching

14
15 ¹² The specific element of the proposed order requiring Defendants to remove narrow,
16 false claims about Arizona law and specific voters does not violate the First
17 Amendment. It is not true that “[i]t is illegal in Arizona to put more than one ballot in
18 the box other than your own.” Compl. ¶ 37 n.6. Instead, Arizona law provides several
19 common circumstances in which depositing multiple ballots into a dropbox is legal,
20 including when family members deposit one another’s ballots. *See* Ariz. Rev. Stat. § 16-
21 1005(I)(2)(a), (c), (d). Stating otherwise, as Defendants’ know, is false and intended to
22 mislead voters and the broader public about voting requirements and procedures.
23 Similarly, posting specific identifying information about individuals in connection with
24 a claim that that individual violated the law based solely on the fact that they deposited
25 multiple ballots at a dropbox is defamatory. These knowing, narrow lies about the
26 mechanics of voting and specific, unfounded accusations about individuals committing
27 voter fraud are unprotected. *Minnesota Voters All. v. Mansky*, 201 L. Ed. 2d 201, 138 S.
28 Ct. 1876, 1889 n.4 (2018) (clarifying that “messages intended to mislead voters about
voting requirements and procedures” may be prohibited); *see* Richard Hasen, *Drawing*
the Line Between False Election Speech and False Campaign Speech, Knight First Am.
Instit. (Oct. 21, 2021) (same); *R.A.V.*, 505 U.S. at 383 (defamatory speech may be
proscribed). Where it is determined that a plaintiff is likely to succeed in proving that
speech is unprotected, a preliminary injunction directing a party to remove that speech
does not violate the First Amendment. *See Pittsburgh Press Co. v. Pittsburgh Comm’n*
on Human Rel., 413 U.S. 376, 390 (1973); *Kramer v. Thompson*, 947 F.2d 666, 675 (3d
Cir. 1991); *id.* at 675 n.25 (collecting authority); Eugene Volokh, *Anti-Libel Injunctions*,
168 U. Penn. L. Rev. 73, 117–20 (2019).

1 within a buffer zone, loitering, and following and taking photos of voters); *New Jersey*
2 *Press Ass’n v. Guadagno*, No. CIV.A. 12-06353 JAP, 2012 WL 5498019 (D.N.J. Nov.
3 13, 2012) (upholding prohibition on photographs within a certain distance of polling
4 places).

5 **B. Enjoining ongoing voter intimidation by requiring Defendants to**
6 **refrain from carrying firearms within 250 feet of drop boxes does not**
7 **violate the Second Amendment**

8 The Second Amendment plainly permits restrictions on carrying firearms near
9 drop boxes because such restrictions are “consistent with this Nation’s historical
10 tradition of firearm regulation.” *New York State Rifle & Pistol Association, Inc. v.*
11 *Bruen*, 142 S. Ct. 2111 (2022). Prohibiting firearms in “sensitive places,” as the
12 Supreme Court has repeatedly recognized, is a “longstanding” type of regulation
13 permitted under the Second Amendment. *Id.*; *see also District of Columbia v. Heller*,
14 554 U.S. 570, 626 (2008). Just this year, the Court reaffirmed that “polling places” in
15 particular were historically considered “sensitive places” at which “weapons were
16 altogether prohibited.” *Bruen*, 142 S. Ct. at 2133; *see also Antonyuk v. Hochul*, 2022
17 WL 5239895, *15 (N.D.N.Y. Oct. 6, 2022). *Bruen* further explained that “sensitive
18 places” were not limited to those recognized at the founding, but that courts could
19 identify “*new and analogous sensitive places*” through historical analogy. *Bruen*, 142 S.
20 Ct. at 2133. In short, firearms may clearly be banned at polling places *and* their
21 modern-day analogues, like ballot drop boxes.

22 Enjoining the open carrying of firearms within 250 feet of drop boxes is
23 consistent with this recognized and permissible historical practice. Drop boxes are
24 analogous to “polling places,” because they are election-specific locations where
25 millions of citizens return their ballots to be counted. The historical record shows that
26 the Founding-era regulations of firearms at polling places swept broadly in order to
27 prevent violence and intimidation at the polls. For example, the 1776 Delaware
28 Constitution prohibited both firearms at polling places *and* armed militia within “*a*
mile” of polling places 24 hours before or after the election in order “[t]o prevent any

1 violence or force being used at . . . said elections.” Del. Const. art. 28 (1776) (emphasis
2 added). Maryland adopted similar provisions in its early constitutions. *See* Darrell A. H.
3 Miller, *Constitutional Conflict and Sensitive Places*, 28 Wm. & Mary Bill of Rights J.
4 459, 473 (2019) (citing Proceedings of the Conventions of the Province of Maryland,
5 Held at the City of Annapolis 1774, 1775, & 1776 185 (1836)). Similarly, a 1787 New
6 York statute provided that “all elections shall be free and that no person by force of
7 arms nor by malice or menacing or otherwise presume to disturb or hinder any citizen of
8 this State to make free election.” *Id.* (citing Act of Jan. 26, 1787, ch. 1, 1787 N.Y. Laws
9 345). Thus, historical regulation of firearms at “polling places” were drawn broadly to
10 mitigate the threat posed to free and fair elections by armed individuals. Limiting the
11 carrying of firearms within 250 feet of a drop box to only concealed carry is thus
12 entirely consistent with (and less burdensome than) these historical regulations.

13 **V. This Court Should Waive The Bond Requirement**

14 The Ninth Circuit has “recognized that Rule 65(c) invests the district court with
15 discretion as to the amount of security required, *if any.*” *Jorgensen v. Cassidy*, 320 F.3d
16 906, 919 (9th Cir. 2003). And “[t]he district court may dispense with the filing of a bond
17 when it concludes there is no realistic likelihood of harm to the defendant from enjoining
18 his or her conduct.” *Id.* Here, there is no harm to the Defendants from enjoining their
19 conduct and certainly no financial harm that would be remedied by a bond. This Court
20 should therefore waive the bond requirement.

21 **VI. CONCLUSION**

22 This Court should grant Plaintiff’s motion for preliminary injunctive relief.
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1 DATED this 28th day of October, 2022.

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OSBORN MALEDON, P.A.

By s/ Joshua D. Bendor

Joshua D. Bendor
Brandon T. Delgado
2929 North Central Avenue, Suite 2100
Phoenix, Arizona 85012-2793

Orion Danjuma (*pro hac vice to be filed*)
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Rachel F. Homer (*pro hac vice*)
PROTECT DEMOCRACY PROJECT
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Benjamin L. Berwick(*pro hac vice*)
PROTECT DEMOCRACY PROJECT
15 Main Street, Suite 312
Watertown, MA 02472

Jared Davidson(*pro hac vice to be filed*)
PROTECT DEMOCRACY PROJECT
3014 Dauphine Street, Suite J
New Orleans, LA 70117

Attorneys for Plaintiff

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

League of Women Voters of Arizona,
Plaintiff,

No. CV-22-08196-PCT-MTL

vs.

**DECLARATION OF
PINNY SHEORAN**

Lions of Liberty LLC; Yavapai County
Preparedness Team; Jim Arroyo, Lucas
Cilano; Nicholas Cilano; Brian Mounsey;
Toby Fox; Bruce Mounsey; James Johnson;
Melody Jennings; Clean Elections USA;
John Does 1-10,

Defendants.

I, Pinny Sheoran, declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters stated in this Declaration.
2. I live in Scottsdale, Arizona and have lived and voted in Arizona since 1990.
3. I have been a member of the League of Women Voters of Arizona (hereafter “League”) for over 6 years, and I am currently president of the League, having been elected president in 2022.
4. The League is a domestic not for profit corporation, duly registered in accordance with Arizona law.
5. The League is an affiliate of the League of Women Voters of the United States.
6. The League dedicates its efforts to protecting and promoting the democratic process of government through public service, civic participation, and robust voter education and registration.
7. The League consists of both a statewide organization and five local chapters with 900 members statewide, and 90 percent of our members use early voting, including mail-in and drop box voting.

- 1 8. The League educates voters about upcoming elections, including the dates and
2 deadlines for early in-person and mail-in voting, as well as the availability of drop
3 box voting in the state. The League also works to encourage individuals to vote;
4 and participates in statewide coalitions with other organizations that share similar
5 goals.
- 6 9. The League envisions a democracy where every person has the desire, the right,
7 the knowledge, and the confidence to participate.
- 8 10. To achieve this mission, the League uses many tools. League volunteers typically
9 help tens of thousands of citizens in Arizona register to vote, check their
10 registration status, update their information, and navigate the system of early in-
11 person and mail-in voting. Throughout the COVID-19 pandemic, the League has
12 provided Arizona citizens with vital voting information through online platforms
13 like VOTE411.org and printed materials, including voter guides. The League
14 continues to encourage Arizona voters to cast their ballot via the mechanism that
15 is safest and most convenient for them, using any of the available early voting
16 options that have been available for decades in Arizona and any of the options to
17 apply for and return a ballot.
- 18 11. The League's mission of educating voters and encouraging them to vote has been
19 directly frustrated by Defendants' actions. Voter surveillance, intimidation, and
20 harassment sharply curtails citizens' willingness to participate in the democratic
21 process and thereby impedes the League's mission. In fact, League members have
22 been directly impacted by drop box intimidation. Voters and League members rely
23 on drop box voting throughout Arizona. But many League members who have
24 voted using drop boxes in the past will no longer use that method for the 2022
25 general election due to surveillance, intimidation, and harassment by Defendants.
26 Drop boxes are particularly important in rural areas such as Yavapai County where
27 mail is less reliable.
- 28

1 12. Because voter intimidation is a vital issue of concern to League members and the
2 public, the League has diverted money, time, and other resources from its core
3 mission of registering voters, encouraging voter participation, and educating
4 voters on ballot initiatives to address Defendants' intimidation tactics.

5 13. The League allocated funds to hire five paid interns to assist with communications
6 efforts, outreach to voters, and management of social media messaging. These
7 communication efforts typically detail voting deadlines and provide information
8 on what measures will be on the upcoming ballot.

9 14. In the wake of the evolving crisis over drop box surveillance, the League has had
10 to divert about 50% of the work of those paid interns towards preparing and
11 communicating to voters to ensure voters know of their rights, including the right
12 to vote without intimidation.

13 15. For example, the League was planning to send out a newsletter to its members in
14 order to get volunteers to help with get out the vote efforts. The League, however,
15 was forced to divert its resources to a newsletter to address the threat of voter
16 intimidation in Arizona. Specifically, the newsletter now advises members on the
17 definition of voter intimidation and what members should do if a member is
18 intimidated at a drop box.

19 16. In addition, the League has also had to expend roughly \$2,000 to send text
20 messages to its list of more than 200,000 women voters advising them of their
21 rights related to voter intimidation

22 17. The League has also had to divert its phone banking efforts. The League originally
23 planned to spend money to make calls to voters about upcoming deadlines and to
24 advise them of the initiatives that will be on the ballot. Because of the voter
25 intimidation occurring at drop boxes, this messaging has also been diverted to
26 advising members of safer locations—for example, inside a county building—to
27 drop off their ballots.

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18. League members in Yavapai County also have had to educate voters who were too afraid to vote at drop box locations due to concerns about security and invasion of privacy.

19. The League has also diverted valuable time and efforts of staff and volunteers to developing protocols for tracking misconduct by drop box vigilantes.

20. Lastly, senior staff of the League have had to adjust their focus from traditional voter mobilization efforts to respond to the drop box vigilante crisis as members have had increasing concerns about drop box intimidation.

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

Executed on October 28, 2022.

DocuSigned by:
Pinny Sheoran
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Pinny Sheoran

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

League of Women Voters of Arizona,
Plaintiff,

No. CV-22-08196-PCT-MTL

vs.

DECLARATION OF
[REDACTED]

Lions of Liberty LLC; Yavapai County
Preparedness Team; Jim Arroyo, Lucas
Cilano; Nicholas Cilano; Brian Mounsey;
Toby Fox; Bruce Mounsey; James Johnson;
Melody Jennings; Clean Elections USA;
John Does 1-10,
Defendants.

I, [REDACTED], declare as follows:

1. I am a [REDACTED]-year-old man who [REDACTED]. My wife and I live in Mesa, Maricopa County, Arizona.
2. I believe that voting is my civic duty. Therefore, on Monday evening, October 17, 2022, my wife and I filled out our ballots together and decided that we would drop them off at a drop box.
3. We drove to the drop box at Mesa City Hall, but it was closed when we arrived. We looked online and found out that the drop box outside of the Maricopa Juvenile Court in Mesa was open and only a couple of miles away. We drove to that drop box and arrived at approximately 6:40 PM.
4. When we arrived, there was a group of six to nine men and women in the parking lot, just south of the drop box. Some were sitting in camping chairs and others were standing nearby the chairs. They were facing the drop box, watching voters drop off their ballots.
5. Some of these individuals by the camping chairs were holding up their iPhones and others were holding tripods—some with iPhones attached to the tripods.

1 One person had a very large camera. These people were clearly filming and
2 photographing voters; I saw the flashes of their cameras.

3 6. When my wife saw these individuals, she was fearful of them taking pictures and
4 she wanted to leave right away without voting.

5 7. It was troubling to me that these individuals caused my wife to be too scared to
6 vote, so I insisted that I would get out of the car and drop off both of our ballots
7 while she stayed inside.

8 8. My wife told me she was worried that the people would be able to zoom in on
9 our ballots and see our phone numbers and then harass us. In response to this
10 concern, I put our two ballots under my shirt and got out of the car.

11 9. As I got out of the car, four of the people by the camping chairs started following
12 me with their cameras and taking pictures of me. They came well within 75-feet
13 of the drop box. They were closer to 30-feet from the drop box.

14 10. Two of the people from the camping chairs asked me if I was a mule. I
15 responded that I was not.

16 11. One person then walked across the street to take a picture of our license plate.

17 12. One person said that they were there “hunting mules.”

18 13. I was frustrated that these individuals were accusing me of doing something
19 illegal when I was simply carrying out my duty to vote. I finally made a crude
20 gesture and a crude remark to them.

21 14. I then got back into the car. Because our car was facing these individuals and I
22 did not want to drive passed them, I pulled away from the drop box in reverse
23 and from there, drove onto the main road.

24 15. As we were pulling out of the lot, I saw one of the individuals get into a white
25 SUV. That person pulled out of the parking lot from a different exit than we
26 used and drove behind us on the main road. The person tried to photograph our
27 license plate while we were driving away.

28

1 16. My wife and I were very upset by this interaction, and my wife was very fearful.
2 I immediately tried to call a toll free number that I found online for Arizona
3 voters, but it was not working, so I went on the Secretary of State’s website and
4 filed a complaint. Attached as **Exhibit A** is the complaint that I filed with the
5 Secretary of State.

6 17. Although I never spoke to the media about what happened, the media got ahold
7 of my complaint, and then got ahold of a surveillance video showing this
8 interaction. News organizations then published stories about the incident.
9 Attached as **Exhibit B** is a web link to one such story, featuring the surveillance
10 video of the interaction. Attached as **Exhibit C** is a Twitter post by the journalist
11 who obtained the surveillance video.

12 18. Since the incident, a person named Melody Jennings who appears to be
13 associated with Clean Elections USA and another person Alice Bagley Mercer
14 posted on social media regarding the incident. Attached as **Exhibits D, E, and F**
15 are social media posts from these individuals, in which they take credit for
16 identifying me as a “mule” but deny that people from Clean Elections USA
17 interacted with me.

18 19. I asked for my name to be redacted from this declaration because I am scared
19 that otherwise the individuals who tried to intimidate me from voting will
20 disparage me by name, harass me personally, and threaten my safety, especially
21 considering their social media posts.

22
23 I declare under penalty of perjury that the foregoing Declaration is true and correct.

24
25 Executed on October 28, 2022. s/ [REDACTED]
26 [REDACTED] [REDACTED]
27

EXHIBIT A

Fwd: Webform: Voting Incident 240

Christine Dyster <cdyster@azsos.gov>

Mon 10/17/2022 8:12 PM

To: Scott Jarrett <sjarrett@risc.maricopa.gov>; Rey Valenzuela RISCX <rvalenzuela@risc.maricopa.gov>; Melissa Davis - RISCX <mdavis@risc.maricopa.gov>; Michael Moore - RISCX <mmoore@risc.maricopa.gov>

Cc: Kori Lorick <KLorick@azsos.gov>; Angie Cloutier <acloutier@azsos.gov>; Jason Chavez <jchavez@azsos.gov>

For your awareness- the following was reported to our office.

Get [Outlook for iOS](#)

From: webmaster@azsos.gov <webmaster@azsos.gov> on behalf of [REDACTED] via Arizona Secretary of State <webmaster@azsos.gov>

Sent: Monday, October 17, 2022 7:28:58 PM

To: Christine Dyster <cdyster@azsos.gov>

Subject: Webform: Voting Incident - -240

CAUTION: The following message contains information provided by an anonymous user through an online webform. Please treat the below message with caution, avoid clicking links, downloading attachments, or replying with personal information.

Submitted values are:

==Incident==

Date of incident: Mon, 10/17/2022

Approximate time of the incident: 6:40 pm

County where incident occurred: Maricopa

Polling location where incident occurred: Mesa juvenile court drop box

Describe the incident: There's a group of people hanging out near the ballot dropbox filming and photographing my wife and I as we approached the dropbox and accusing us of being a mule. They took a photographs of our license plate and of us and then followed us out the parking lot in one of their cars continuing to film.

Were you able to report this incident to the poll workers or county officials?

Current status of the incident: Ongoing

Files: No, I don't have any additional information.

==Contact Info==

Full Name: [REDACTED]

Email: [REDACTED]

Phone Number: [REDACTED]

EXHIBIT B

ABC15.Com Staff, *Intimidation Complaint Claims Voter was Filmed, Accused of Being 'Mule' at Mesa Dropbox*, ABC15, Oct. 20, 2022,

<https://www.abc15.com/news/political/elections/intimidation-complaint-claims-voter-was-filmed-accused-of-being-mule-at-mesa-dropbox> (last visited Oct. 28, 2022).

EXHIBIT C



The AZ - abc15 - Dat...
40.1K Tweets



Tweets

Tweets & replies

Media

Likes



The AZ - abc15 - Data... [verified] · 5d ...

Replying to @Garrett_Archer

Update: we have obtained the security footage.

twitter.com/Garrett_Archer...



The AZ - abc15 - D... [verified] · 5d

DEVELOPING: @abc15 has obtained the security footage of alleged voter intimidation at Mesa drop box. Full video is 20 minutes long, we have edited it and blurred the voter. There's no audio on original video, but voter claims he was photographed and accused of being a mule.

[Show this thread](#)

October 17, 2022 6:21:37 PM



EXHIBIT D



Alice Bagley Mercer is with **Gail Golec** and **8 others**.



2d · 🌐

Mule hunting tonight.
This is a mule driving up to the outdoor Dropbox. He proceeded to get out, hide his stack of ballots and talk smack to us. Then proceeded to back up so we couldn't take a picture of his license plate. YES! 2,000 mules was real! We regrouped and put a person at all angles now. Disgusting how our elections are corrupt!



EXHIBIT E



Case 3:22-cv-08196-MTL Document 11-2 Filed 10/28/22 Page 14 of 16
TrumperMel ✓

@TrumperMel · 2d

This guy. Drove in backwards to avoid plate detection. Got out showing his back. Pulled ballots out of his shirt. I need people there tonight to help my people. Lots of you! 75 ft away from box, post up opposite so we see both sides. Someone get tags. No talking to them. Do NOT GO INSIDE 75 ft! They are trying to get us to engage them. Do not do it!

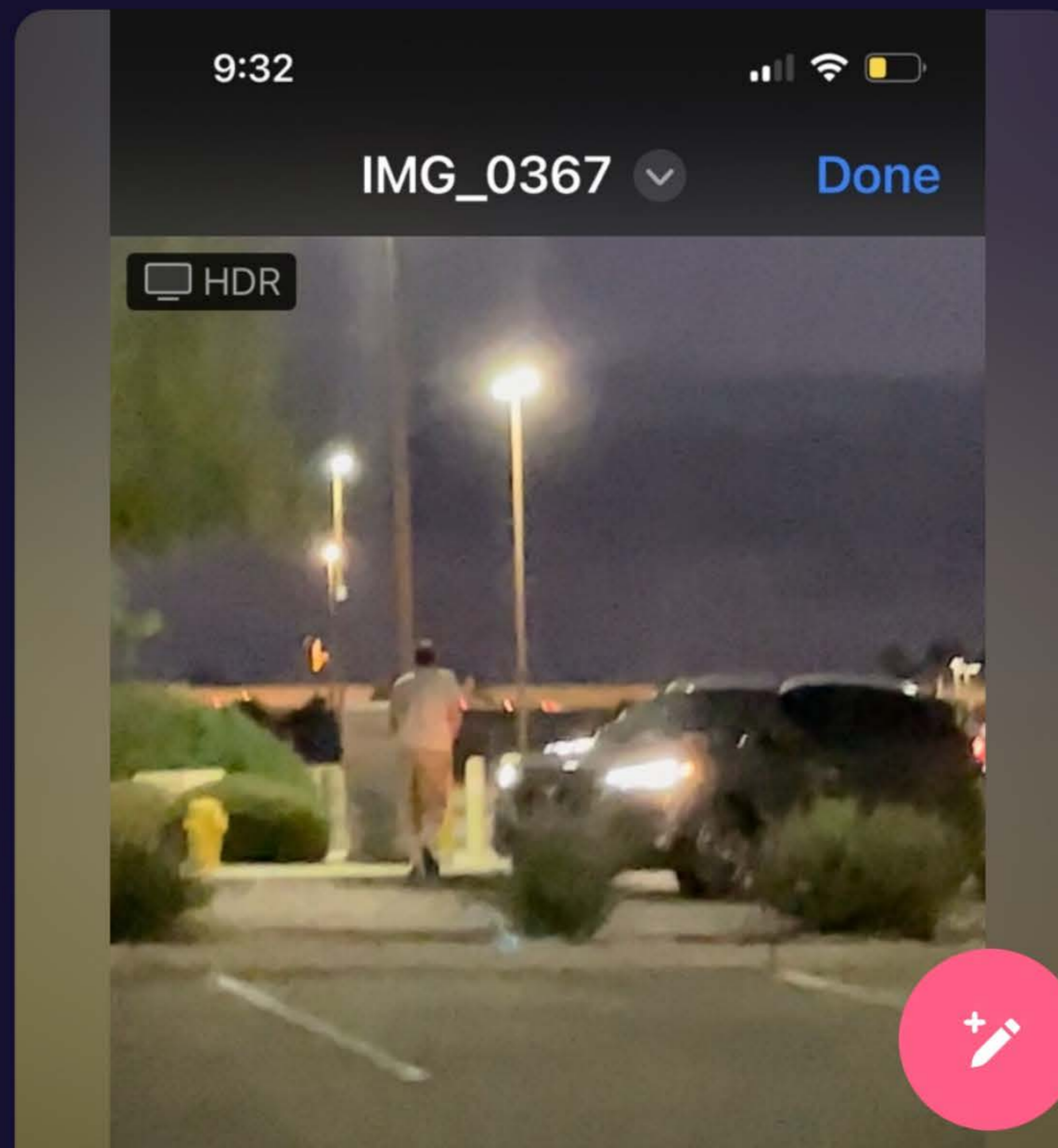



EXHIBIT F



TrumperMel 

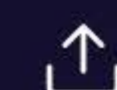
@TrumperMel · 11h

Public statement. On Monday night a man drove up to a drop box in Maricopa County. He asked people sitting outside the 75 ft perimeter where the drop box was. Another individual not associated with Clean Elections USA who was there on his own responded to this individual. At no time did anyone from Clean Clean Elections USA interact with this person who drove up to the box.

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Tweet your reply

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

League of Women Voters of Arizona,
Plaintiff,

No. CV-22-08196-PCT-MTL

vs.

**DECLARATION OF
DANIEL RIVERA**

Lions of Liberty LLC; Yavapai County
Preparedness Team; Jim Arroyo, Lucas
Cilano; Nicholas Cilano; Brian Mounsey;
Toby Fox; Bruce Mounsey; James Johnson;
Melody Jennings; Clean Elections USA;
John Does 1-10,

Defendants.

I, Daniel Rivera, declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters stated in this Declaration.
2. I am a 44-year-old man who works in information technology and lives in Tempe, Maricopa County, Arizona. I live with my wife and our son, who struggles with his mental health. My wife and I care for our son.
3. On Saturday, October 22, 2022, at approximately 1:30 PM, my wife and I brought our ballots and our son's ballot to the drop box at the Maricopa Juvenile Court in Mesa.
4. My son was too scared to bring his ballot to a drop box himself because he heard about people observing voters at the drop boxes in Maricopa County and he was nervous about what they might do to voters. My wife and I did not want to exacerbate any of our son's anxiety so we told him that we would drop off his ballot with our own.

- 1 5. When we first arrived in the parking lot at the Maricopa Juvenile Court, I saw a
2 person reach into his car and hold up a sign that said “I invoke my right to vote”
3 in front of a Range Rover.
- 4 6. I then noticed that a man was sitting in that same Range Rover. He was about 35
5 feet away from the drop box, sitting in the driver’s seat of the car with the car
6 turned on.
- 7 7. Although the windows of the Range Rover were tinted, I could see the man
8 inside, looking at the voters who were dropping off ballots. It also looked like he
9 was writing down information.
- 10 8. I could see a camera or recording device in the backseat of his car, pointed
11 directly at the drop box.
- 12 9. This person in the Range Rover made me feel very uncomfortable. It also made
13 me uncomfortable that he was filming me.
- 14 10. My wife was extremely nervous as well. She started panicking that the man
15 might have a gun and might shoot us, and she said that we should leave. If I had
16 not been able to calm her down, she would have left without voting.
- 17 11. Eventually, once I calmed my wife down, we both dropped off our ballots.
- 18 12. I took a picture of the Range Rover’s license plate as I headed back to our car.
- 19 13. I filed a complaint with the Secretary of State soon after this happened. Attached
20 as **Exhibit A** is that complaint.
- 21 14. We were fortunate that the man in the Range Rover did not act against us, but it
22 was still intimidating to have someone watching us and filming us in such close
23 proximity to us while we were voting.

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

Executed on October ~~28~~ 2022.

Daniel Rivera

Daniel Rivera

EXHIBIT A

10/23/22, 1:56 PM

Mail - Kori Lorick - Outlook

Fwd: Webform: Voting Incident 248

Christine Dyster <[REDACTED]@azsos.gov>

Sun 10/23/2022 12:26 PM

To: Kori Lorick [REDACTED]@azsos.gov

Get [Outlook for iOS](#)

From: webmaster@azsos.gov <webmaster@azsos.gov> on behalf of [REDACTED] via Arizona Secretary of State <webmaster@azsos.gov>

Sent: Saturday, October 22, 2022 10:44:53 PM

To: Christine Dyster <[REDACTED]@azsos.gov>

Subject: Webform: Voting Incident - -248

CAUTION: The following message contains information provided by an anonymous user through an online webform. Please treat the below message with caution, avoid clicking links, downloading attachments, or replying with personal information.

Submitted values are:

==Incident==

Date of incident: Sat, 10/22/2022

Approximate time of the incident: 1:30 pm

County where incident occurred: Maricopa

Polling location where incident occurred: Mesa Juvenile Court

1810 S Lewis Mesa, AZ

Describe the incident:

There was a Range Rover parked near the ballot drop box. No one approached anyone, but they were within 75 feet of the drop box.

License plate Arizona [REDACTED]

I took a picture of his vehicle. Other people felt nervous about this person and one person held up their sign for his cameras that's said "I invoke my right to vote."

Police should be there driving these people off!

Were you able to report this incident to the poll workers or county officials? No

Current status of the incident: Ongoing

Files: No, I don't have any additional information.

==Contact Info==

Full Name: [REDACTED]

Email: [REDACTED]

Phone Number: [REDACTED]

10/23/22, 1:56 PM

Mail - Kori Lorick - Outlook

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

League of Women Voters of Arizona,

Plaintiff,

vs.

Lions of Liberty LLC; Yavapai County
Preparedness Team; Jim Arroyo, Lucas
Cilano; Nicholas Cilano; Brian Mounsey;
Toby Fox; Bruce Mounsey; James Johnson;
Melody Jennings; Clean Elections USA;
John Does 1-10,

Defendants.

No. 3:22-cv-08196

**DECLARATION OF
DONALD C. OVERLOCK**

I, Donald C. Overlock, declare as follows:

1. I am 72 years old, have personal knowledge of the matters stated in this Declaration, and could and would competently testify to these facts.
2. I am a United States citizen and currently reside in Mesa, Arizona, where I have lived for the last twenty-six years.
3. I have been voting since I was twenty-one years old. When I first voted, a voter had to be twenty-one to be eligible to vote.
4. For the past ten years, I have voted using mail-in ballots. I am on the state's Active Early Voting List, which automatically sends out mail-in ballots to those who are registered.
5. I have used a ballot drop box twice in the past without incident.

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6. Around 12:30 pm on Thursday, October 20th, 2022, I drove with my wife to the Mesa Juvenile Court to deposit our ballots for the 2022 general election. I noticed a truck in the parking lot, with five or six men standing around the truck. The truck was parked in the second row of parking spaces directly across from the drop box's location.
7. The men appeared to be about twenty to thirty years in age. I didn't see if they had any weapons, but I was not actively looking for any weapons.
8. My wife parked the car, and my wife and I both went to individually drop off our own ballots. We both had seen news coverage of people being photographed for dropping off ballots and didn't want to be targeted.
9. After returning to our car, my wife noticed that two men began taking photographs of our license plate after we arrived. I confronted them to ask why they were taking photographs of my car. They responded that they were photographing us to provide election security.
10. I told them I was going to take a picture of them too and that I would be reporting them for voter intimidation and harassment. The men appeared to be angry in response to this.
11. I returned to my car and the men continued to either record or photograph my car as we drove away. When I arrived back home, I called the Secretary of State's office and reported the incident.
12. I had heard of such conduct taking place, but never personally experienced it. It really bothered me and made me very uncomfortable.

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13. I did go through with voting but I am worried that this group took down my license plate number and photographed my wife and me. I am concerned they might use my license plate to try to find my address to harass me and my wife in person, especially since they reacted badly when I photographed them.

14. I am also concerned that someone who is less confident than I am would have just decided not to vote rather than doing so while being watched and photographed.

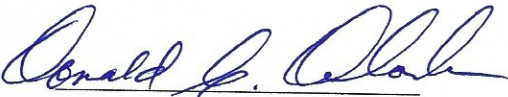
15. If the voter had been an elderly woman or a young person voting for the first time, the sight of half-a-dozen men taking photographs might scare them away from voting. That thought makes me truly angry.

16. While I am still concerned that these individuals might try to use my personal information, I believe it is more important to take a stand against voter intimidation.

17. It is wrong for these groups to make people uncomfortable and try to scare them off from voting. I will not stand by while these groups try to infringe on my right to vote or the right of other Americans to do the same.

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

Executed on October 27, 2022.



Donald C. Overlock

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

League of Women Voters of Arizona,
Plaintiff,

No. 3:22-cv-08196

vs.

**DECLARATION OF
JOHN I. EVANS**

Lions of Liberty LLC; Yavapai County
Preparedness Team; Jim Arroyo, Lucas
Cilano; Nicholas Cilano; Brian Mounsey;
Toby Fox; Bruce Mounsey; James Johnson;
Melody Jennings; Clean Elections USA;
John Does 1-10,
Defendants.

I, John Isadore Evans, declare as follows:

1. I am 67 years old, have personal knowledge of the matters stated in this Declaration, and could and would competently testify to these facts.
2. I am a citizen of the United States of America, and currently reside in Phoenix, Arizona, where I have lived for the last thirty-one years.
3. For at least the past twenty years, I have voted early using mail-in ballots. I am registered on the state's Active Early Voting List, which automatically sends out mail-in ballots to those who are registered.
4. I previously used a drop box during the 2022 primary election without incident, as I was concerned that new policies instituted under Postmaster General Louis

1 Dejoy could result in delays that would prevent my vote from being counted in
2 time. Prior to this, I had always felt comfortable mailing my ballot in.

- 3 5. Around 2:30 PM on Wednesday, October 19th, 2022, I drove to the Maricopa
4 County Recorder's Office, located at the corner of Lincoln and 3rd Avenue in
5 downtown Phoenix, to drop off completed ballots for myself and my wife.
- 6 6. As I drove up to the drop box and deposited our two ballots, I saw people
7 monitoring the site with cameras and tripods.
- 8 7. There were three people present at the site when I was there, stationed on the
9 sidewalk. I thought that their presence was strange and disconcerting.
- 10 8. As I drove through the parking lot, two of them jumped behind their cameras
11 tracking me. Via my rearview mirror, it now seemed they were taking photos of
12 me, my vehicle and license plate as I went to drop my ballots.
- 13 9. I drove back around the corner and asked them from my vehicle who they were.
14 They refused to identify themselves, only saying that they were concerned about
15 voting irregularities.
- 16 10. When I pressed them on what they were doing and told them that they did not
17 have my permission to photograph me, they responded by asking me why I
18 wanted to know and implied that the County Recorder's "security" had given
19 them permission to be there. They invited me to verify by checking inside with
20 the Recorder's Office.
- 21 11. I did go to ask staff inside the Recorder's Office about this group. Staff informed
me that they hadn't given them permission to monitor but that they had

1 experienced similar activity in the past, to the point that employees had quit due
2 to feeling intimidated by these groups.

3 12. Staff even said there had been past incidents where people from these groups had
4 been brandishing guns. I had heard about some of these incidents on the news
5 before, and happening currently at other drop boxes, but had not yet experienced
6 it in person.

7 13. When I left the Recorder's Office, the people were still there monitoring the drop
8 box. When I arrived at home, I filed a report of voter harassment and
9 intimidation with the Arizona Secretary of State's office.

10 14. I found voting under these circumstances to be upsetting, harassing and an
11 invasion of my privacy. It made me angry that I and my license plates were
12 being photographed simply because I was voting using a drop box. It felt like
13 they were trying to make me uncomfortable simply for voting. And it also made
14 me worried about how these people might try to use my personal information.

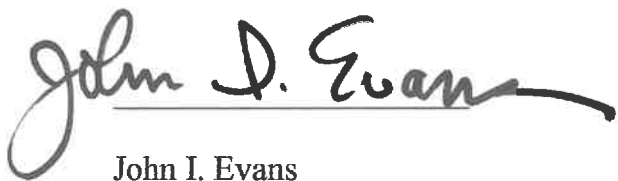
15 15. I did end up voting. But I spoke to my wife about the incident and she told me
16 she would not have felt comfortable voting in that type of situation.

17 16. Mail-in balloting has been safe for years in Arizona, for any party, and I cannot
18 comprehend why anyone, any group or cult, specifically determined to deter
19 citizens from their Constitutional rights, and believing that their warped beliefs,
20 as proven again and again in courts trump all others.

21 I declare under penalty of perjury that the foregoing Declaration is true and correct.

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Executed on October 27, 2022.


John I. Evans

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

<p>League of Women Voters of Arizona, Plaintiff, vs. Lions of Liberty LLC; Yavapai County Preparedness Team; Jim Arroyo, Lucas Cilano; Nicholas Cilano; Brian Mounsey; Toby Fox; Bruce Mounsey; James Johnson; Melody Jennings; Clean Elections USA; John Does 1-10, Defendants.</p>	<p>No. 3:22-cv-08196 DECLARATION OF LOIS HANSEN</p>
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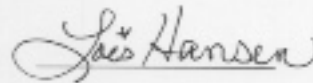
I, Lois Hansen, declare as follows:

1. I am 68 years old, have personal knowledge of the matters stated in this Declaration, and could and would competently testify to these facts.
2. I am a citizen of the United States of America, and currently reside in Peoria, Arizona, where I have lived since 2007.
3. I am retired, and previously worked as a dietician.
4. Since 2020, I have been a member of the Northwest Maricopa County chapter of League of Women Voters.
5. I regularly vote in elections, and have mostly voted by mail for over ten years. However, voted using a drop box in 2020.

- 1 6. For this election, I had considered using a drop box again. But I decided that it
2 was not an option after learning of voter intimidation taking place at drop box
3 sites.
- 4 7. I learned about the intimidation from online news sources, including the Arizona
5 Mirror.
- 6 8. I saw images of people dressed like the insurrectionists from the January 6th riot
7 at the Capitol, including scarves over their faces and military garb. I also heard
8 that at some locations, people were armed.
- 9 9. What I found especially concerning, however, were reports of people taking
10 pictures of voters' license plates and cars. That seems like a first step towards
11 doxing and harassment. Voters who are doxed might actually be in more danger
12 than someone who votes while being surveilled by an armed individual.
- 13 10. As a result, I will be mailing in my ballot for this election, as the idea of someone
14 coming to my home after I am doxed and falsely accused of voting illegally
15 makes me deeply uncomfortable.

16 I declare under penalty of perjury that the foregoing Declaration is true and correct.

17
18 Executed on October 27, 2022.



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20 Lois Hansen

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

<p>League of Women Voters of Arizona, Plaintiff, vs. Lions of Liberty LLC; Yavapai County Preparedness Team; Jim Arroyo, Lucas Cilano; Nicholas Cilano; Brian Mounsey; Toby Fox; Bruce Mounsey; James Johnson; Melody Jennings; Clean Elections USA; John Does 1-10, Defendants.</p>	<p>No. 3:22-cv-08196 DECLARATION OF KAREN DEVINE</p>
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I, Karen Devine, declare as follows:

1. I am 65 years old, have personal knowledge of the matters stated in this Declaration, and could and would competently testify to these facts.
2. I am a citizen of the United States of America, and currently reside in Buckeye, Arizona, where I have lived since October of 2021 after first retiring and moving from Pennsylvania, then later relocating from Scottsdale, Arizona.
3. I previously worked for 32 years in government affairs for various organizations in Pennsylvania at a time when both sides of the political aisle still worked together. I worked for the Pennsylvania Intergovernmental Council, the Pennsylvania State Association of Township Supervisors, and spent the final

1 years of my career with the Pennsylvania School Boards Association, managing
2 a team that trained school directors and conducted superintendent searches. My
3 work often took me to the state capitol building in Harrisburg, but I would also
4 take biannual trips to the Capitol in Washington as well when I brought advocacy
5 groups to meetings with their Congressional representatives.

6 4. I am a member of the League of Women Voters, specifically with the League's
7 Northwest Maricopa County Board and Arizona chapters.

8 5. I registered to vote in Arizona almost immediately after moving to the state.

9 6. I knew that politics could be crazy from my work in Pennsylvania, but the
10 political environment in Arizona is worse than anything that I have encountered.
11 I remember crying the day of the insurrection on January 6th, 2021, and watching
12 militia groups ransack through the halls of Congress where I had proudly
13 worked. It frightens me to know that similar groups are based here in Arizona,
14 where I now live.

15 7. I first heard of potential voter intimidation taking place at drop boxes earlier this
16 month when it was reported by the local news on ABC15. I saw images of men
17 in a pickup truck dressed in tactical gear, and later heard of threats of potential
18 violence.

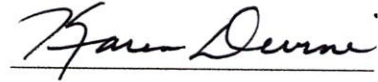
19 8. I had planned on voting by a drop box this year, because I was concerned that if I
20 voted by mail, processing delays or errors might cause my ballot to be counted
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too late. But after seeing what was taking place at drop boxes, I was scared to follow through with it. I decided it was better to risk a delay than my safety.

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

Executed on October 27, 2022.



Karen Devine

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

League of Women Voters of Arizona,

Plaintiff,

No. 3:22-cv-08196

vs.

**DECLARATION OF
LORNA BANISTER**

Lions of Liberty LLC; Yavapai County
Preparedness Team; Jim Arroyo, Lucas
Cilano; Nicholas Cilano; Brian Mounsey;
Toby Fox; Bruce Mounsey; James Johnson;
Melody Jennings; Clean Elections USA;
John Does 1-10,

Defendants.

I, Lorna Banister, declare as follows:

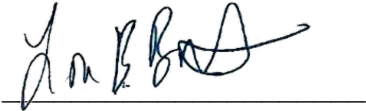
1. I am 46 years old, have personal knowledge of the matters stated in this Declaration, and could and would competently testify to these facts.
2. I am a citizen of the United States of America, and currently reside in Phoenix, Arizona, where I have lived since 2013.
3. I work as in-house counsel to a homebuilder, and am a member of the League of Women Voters' Arizona chapter, having joined this year.
4. I regularly vote in elections, using a variety of methods. I have voted in person, by mail, and via drop box without incident in the past. During the primary elections held this August in Arizona, I voted in person.

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- 5. My original intent for the general election this year was to vote using a drop box. After seeing news coverage of people in tactical gear monitoring drop boxes, I no longer plan on doing so. From what I understood, they were very close to the drop boxes, and they were confronting some voters as they were dropping off their ballots.
- 6. I have heard that they have said they do not want to intimidate legal voters, but only people who are dropping off multiple ballots illegally. I'm not sure how they determine who is voting legally and who is not without confronting voters.
- 7. I will be voting by mail this year. I do not want to deal with these individuals.

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

Executed on October 27, 2022.



Lorna Banister

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

<p>League of Women Voters of Arizona, Plaintiff, vs. Lions of Liberty LLC; Yavapai County Preparedness Team; Jim Arroyo, Lucas Cilano; Nicholas Cilano; Brian Mounsey; Toby Fox; Bruce Mounsey; James Johnson; Melody Jennings; Clean Elections USA; John Does 1-10, Defendants.</p>	<p>No. 3:22-cv-08196 DECLARATION OF LESLIE HANSON</p>
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I, Leslie Hanson, declare as follows:

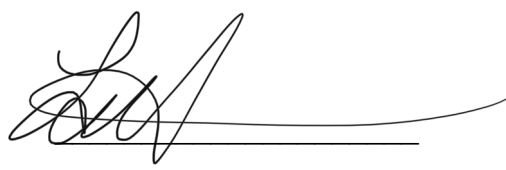
1. I am 63 years old, have personal knowledge of the matters stated in this Declaration, and could and would competently testify to these facts.
2. I am a citizen of the United States of America, and currently reside in Phoenix, Arizona, where I have lived since 2020 after moving from Indiana.
3. I am currently retired, and previously worked as the owner of a small retail business in Indiana. I am a member of the League of Women Voters, and was part of a local chapter in Indiana starting in the late 1980s. I transferred my membership to the Arizonan chapter after I moved.

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- 4. I voted for the first time as an Arizona resident by mail in the August primary elections.
- 5. I was originally planning to vote via drop box in the general election, specifically at a Mesa drop box.
- 6. But I changed my plans after seeing news coverage of people dressed in tactical gear taking pictures of voters at drop boxes and verbally accosting them. The thought of dealing with that kind of verbal harassment and invasion of privacy is intimidating. I no longer consider voting via drop box a viable option.

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

Executed on October 27, 2022.



Leslie Hanson

<p>1 Joshua D. Bendor, 031908 2 Brandon T. Delgado, 035924 3 OSBORN MALEDON, P.A. 4 2929 North Central Ave., Suite 2100 5 Phoenix, Arizona 85012-2793 6 (602) 640-9000 7 jbendor@omlaw.com 8 bdelgado@omlaw.com</p> <p>9 Orion Danjuma (<i>pro hac vice to be filed</i>) 10 NY Reg No. 4942249 11 PROTECT DEMOCRACY PROJECT 12 82 Nassau St. #601 13 New York, NY 10038 14 Tel: (202) 579-4582 15 orion.danjuma@protectdemocracy.org</p> <p>16 Rachel F. Homer (<i>pro hac vice</i>) 17 DC Bar No. 1045077 18 PROTECT DEMOCRACY PROJECT 19 2020 Pennsylvania Avenue NW, #163 20 Washington, DC 20006 21 Tel: (202) 579-4582 22 rachel.homer@protectdemocracy.org</p> <p>23 Attorneys for Plaintiff</p>	<p>Benjamin L. Berwick(<i>pro hac vice</i>) MA Bar No. 679207 PROTECT DEMOCRACY PROJECT 15 Main Street, Suite 312 Watertown, MA 02472 Tel: (202) 579-4582 ben.berwick@protectdemocracy.org</p> <p>Jared Davidson (<i>pro hac vice to be filed</i>) LA Bar No. 37093 PROTECT DEMOCRACY PROJECT 3014 Dauphine Street, Suite J New Orleans, LA 70117 Tel: (202) 579-4582 jared.davidson@protectdemocracy.org</p>
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16 IN THE UNITED STATES DISTRICT COURT
17 FOR THE DISTRICT OF ARIZONA

18 League of Women Voters of Arizona,
19 Plaintiff,
20 vs.
21 Lions of Liberty LLC; Yavapai County
22 Preparedness Team; Jim Arroyo, Lucas
23 Cilano; Nicholas Cilano; Brian Mounsey;
24 Toby Fox; Bruce Mounsey; James Johnson;
25 Melody Jennings; Clean Elections USA;
26 John Does 1-10,
27 Defendants.

No. CV-22-08196-PCT-MTL

**DECLARATION OF
RACHEL F. HOMER**

28 I, Rachel F. Homer, declare as follows:

- 1 1. I am over the age of 18 and have personal knowledge of the matters stated in this
2 Declaration.
- 3 2. I am an attorney with the Protect Democracy Project, and am counsel for
4 Plaintiff League of Women Voters of Arizona. I submit this declaration to
5 provide the Court true and correct copies of certain documents submitted in
6 support of Plaintiff’s Motion for Temporary Restraining Order and Preliminary
7 Injunction.
- 8 3. **Exhibit A** is a true and correct copy of a Reuters article titled “Fact Check-Does
9 ‘2000 Mules’ provide evidence of voter fraud in the 2020 U.S. presidential
10 election?,” dated May 27, 2022. The article is available at
11 [https://www.reuters.com/article/factcheck-usa-mules/fact-check-does-2000-
14 mules-provide-evidence-of-voter-fraud-in-the-2020-u-s-presidential-election-
15 idUSL2N2XJ0OQ](https://www.reuters.com/article/factcheck-usa-mules/fact-check-does-2000-
12 mules-provide-evidence-of-voter-fraud-in-the-2020-u-s-presidential-election-
13 idUSL2N2XJ0OQ).
- 16 4. **Exhibit B** is a true and correct copy of a Business Insider article titled “Former
17 AG Bill Barr laughs at Dinesh D’Souza’s election conspiracy theory film ‘2000
18 Mules’ in January 6 Committee deposition,” dated June 13, 2022. The article is
19 available at [https://www.businessinsider.com/bill-barr-mocks-2000-mules-film-
21 january-6-deposition-video-2022-6](https://www.businessinsider.com/bill-barr-mocks-2000-mules-film-
20 january-6-deposition-video-2022-6).
- 22 5. **Exhibit C** is a true and correct copy of a Politico.com article titled “Arizona
23 AG’s office asks feds to investigate conservative nonprofit True the Vote,”
24 dated October 14, 2022. The article is available at
25 <https://www.politico.com/news/2022/10/14/arizona-ag-true-the-vote-00061973>.
- 26 6. **Exhibit D** is a true and correct copy of a letter from Reginald “Reggie” Grigsby,
27 Chief Special Agent, Special Investigations Section, Office of Attorney General
28 Mark Brnovich, dated October 14, 2022. The letter is available at
<https://www.azag.gov/sites/default/files/2022-10/202210141445.pdf>.
7. **Exhibit E** is a true and correct copy of a ProPublica article titled “‘Big Lie’
Vigilantism Is on the Rise. Big Tech is Failing to Respond.,” dated June 17,

1 2022. The article is available at [https://www.propublica.org/article/election-](https://www.propublica.org/article/election-fraud-ballot-mules-facebook-tiktok-memes)
2 [fraud-ballot-mules-facebook-tiktok-memes.](https://www.propublica.org/article/election-fraud-ballot-mules-facebook-tiktok-memes)

3 8. **Exhibit F** is a true and correct copy of a New York Times article titled “Hunting
4 for Voter Fraud, Conspiracy Theorists Organize ‘Stakeouts’,” dated August 10,
5 2022. The article is available at

6 [https://www.nytimes.com/2022/08/10/technology/voter-drop-box-conspiracy-](https://www.nytimes.com/2022/08/10/technology/voter-drop-box-conspiracy-theory.html)
7 [theory.html.](https://www.nytimes.com/2022/08/10/technology/voter-drop-box-conspiracy-theory.html)

8 9. **Exhibit G** is a true and correct copy of The Lions of Liberty webpage titled
9 “Operation: Drop Box.” The webpage is archived and available at

10 [https://web.archive.org/web/20221012190606/https://thelionsofliberty.com/opera-](https://web.archive.org/web/20221012190606/https://thelionsofliberty.com/operation-drop-box/)
11 [tion-drop-box/.](https://web.archive.org/web/20221012190606/https://thelionsofliberty.com/operation-drop-box/)

12 10. **Exhibit H** is a true and correct copy of a Verde Valley Independent article titled
13 “Ballot ‘drop watch’ won’t intimidate voters, says ‘Lion’,” dated October 5,
14 2022. The article is available at

15 [https://www.verdenews.com/news/2022/oct/05/ballot-drop-watch-wont-](https://www.verdenews.com/news/2022/oct/05/ballot-drop-watch-wont-intimidate-voters-says-lion/)
16 [intimidate-voters-says-lion/.](https://www.verdenews.com/news/2022/oct/05/ballot-drop-watch-wont-intimidate-voters-says-lion/)

17 11. **Exhibit I** is a true and correct copy of a Vice News article titled “Armed Fringe
18 Groups Are Gearing Up to ‘Protect’ Midterm Ballot Dropboxes,” dated October
19 6, 2022. The article is available at [https://www.vice.com/en/article/dy7wvj/lions-](https://www.vice.com/en/article/dy7wvj/lions-of-liberty-oath-keepers-midterm-ballot-boxes)
20 [of-liberty-oath-keepers-midterm-ballot-boxes.](https://www.vice.com/en/article/dy7wvj/lions-of-liberty-oath-keepers-midterm-ballot-boxes)

21 12. **Exhibit J** is a true and correct copy of a MilitiaWatch article titled “Why, CPT?:
22 Arizona Oath Keepers as a microcosm for the movement,” dated June 28, 2021.
23 The article is available at [https://militia.watch/read/ycpt-az-ok/.](https://militia.watch/read/ycpt-az-ok/)

24 13. **Exhibit K** is a true and correct copy of a Media Matters for America article titled
25 “Steve Bannon hosts QAnon-linked activist to promote organization seemingly
26 focused on intimidating voters,” dated October 17, 2022. The article is available
27 at [https://www.mediamatters.org/steve-bannon/steve-bannon-hosts-qanon-](https://www.mediamatters.org/steve-bannon/steve-bannon-hosts-qanon-linked-activist-promote-organization-seemingly-focused)
28 [linked-activist-promote-organization-seemingly-focused.](https://www.mediamatters.org/steve-bannon/steve-bannon-hosts-qanon-linked-activist-promote-organization-seemingly-focused)

- 1 14. **Exhibit L** is a true and correct copy of a post by user @TrumperMel on Truth
2 Social, dated September 8, 2022.
- 3 15. **Exhibit M** is a true and correct copy of a post by user @TrumperMel on Truth
4 Social, dated October 17, 2022.
- 5 16. **Exhibit N** is a true and correct copy of a post by user @TrumperMel on Truth
6 Social, dated October 16, 2022.
- 7 17. **Exhibit O** is a true and correct copy of a post by former President Donald J.
8 Trump under username @realDonaldTrump on Truth Social, on or around
9 October 16, 2022.
- 10 18. **Exhibit P** is a true and correct copy of a post by reporter Nicole Grigg under
11 username @NicoleSGrigg on Twitter, dated October 19, 2022. The video
12 included in the post is available at
13 <https://twitter.com/NicoleSGrigg/status/1582887636884066304>.
- 14 19. **Exhibit Q** is a true and correct copy of a post by user @TrumperMel on Truth
15 Social, dated October 19, 2022.
- 16 20. **Exhibit R** is a true and correct copy of a post by reporter Nicole Grigg under
17 username @NicoleSGrigg on Twitter, dated October 23, 2022.
- 18 21. **Exhibit S** is a true and correct copy of a post by user @TrumperMel on Truth
19 Social, on or around October 21, 2022.
- 20 22. **Exhibit T** is a true and correct copy of a post by user @TrumperMel on Truth
21 Social, dated October 17, 2022.
- 22 23. **Exhibit U** is a true and correct copy of a post by reporter Nicole Grigg under
23 username @NicoleSGrigg on Twitter, dated October 19, 2022. The video
24 included in the post is available at
25 <https://twitter.com/nicolesgrigg/status/1582904476393820160>.
- 26 24. **Exhibit V** is a true and correct copy of a post by user @TrumperMel on Truth
27 Social, dated October 22, 2022.

28

- 1 25. **Exhibit W** is a true and correct copy of an Arizona Mirror article titled
2 “Republicans are urging vigilantes to watch ballot drop boxes, polling locations,
3 to sniff out fraud,” dated August 2, 2022. The article is available at
4 [https://www.azmirror.com/2022/08/02/republicans-are-urging-vigilantes-to-](https://www.azmirror.com/2022/08/02/republicans-are-urging-vigilantes-to-watch-ballot-drop-boxes-polling-locations-to-sniff-out-fraud/)
5 [watch-ballot-drop-boxes-polling-locations-to-sniff-out-fraud/](https://www.azmirror.com/2022/08/02/republicans-are-urging-vigilantes-to-watch-ballot-drop-boxes-polling-locations-to-sniff-out-fraud/).
- 6 26. **Exhibit X** is a true and correct copy of a post by State Senator Kelly Townsend
7 under username @AZKellyT on Twitter, dated October 24, 2022.
- 8 27. **Exhibit Y** is a true and correct copy of a post by reporter Jack Healy under
9 username @jackhealyNYT on Twitter, dated October 27, 2022.
- 10 28. **Exhibit Z** is a true and correct copy of a post by user @JeannieGiering on
11 Twitter, dated July 31, 2022.

12

13 I declare under penalty of perjury that the foregoing Declaration is true and correct.

14

15

16 Executed on October 28, 2022.

/s/ Rachel F. Homer

Rachel F. Homer

17

18

19

20

21 DATED this 28th day of October, 2022.

22

23 OSBORN MALEDON, P.A.

24 By s/ Joshua D. Bendor

25 Joshua D. Bendor
26 Brandon T. Delgado
27 2929 North Central Avenue, Suite 2100
28 Phoenix, Arizona 85012-2793

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Attorneys for Plaintiff

Exhibit A



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REUTERS FACT CHECK MAY 27, 2022 / 8:29 AM / UPDATED 5 MONTHS AGO

Fact Check-Does '2000 Mules' provide evidence of voter fraud in the 2020 U.S. presidential election?

By Reuters Fact Check

16 MIN READ



A documentary directed by conservative commentator Dinesh D'Souza claims it can prove widespread fraud was carried out during the 2020 presidential election in the United States. Reuters Fact Check examined the main claims presented in the film and did not find any concrete evidence definitively showing proof of fraud.

The 90-minute film "2000 Mules" sees D'Souza team up with True the Vote, a Texas-based nonprofit that describes itself as protecting election integrity (www.truethetvote.org/about/), to investigate alleged voter fraud in Arizona, Georgia, Michigan, Pennsylvania and Wisconsin.

All five of the listed states were swing states in 2020 that ultimately backed Joe Biden for president - and were later central to baseless speculations of fraud.

Reuters has covered this topic extensively ([here](#)) and ([here](#)), as well as in fact checks ([here](#)), ([here](#)) and ([here](#)).

D'Souza's documentary says Biden victories in swing states could be thanks to 2,000 people - or "mules" - who were hired by unnamed nonprofits - dubbed "stash

houses” - to conduct “ballot trafficking” i.e. stuffing numerous drop boxes with potentially fake absentee ballots.

It also alleges that the so-called “mules” were paid \$10 for every fake ballot they submitted.

D’Souza did not respond to multiple requests for comment from Reuters.

THE METHODOLOGY

D’Souza and True the Vote analyzed surveillance footage of drop boxes mostly from Georgia, as well as “some” from Arizona, along with “geotracking” data purchased from unnamed brokers.

The “geotracking” data was gleaned from cellphone apps pinpointing device location and movements between Oct. 1, 2020, and election day, Nov. 3, for Arizona, Michigan, Pennsylvania and Wisconsin, according to the documentary. Data for Georgia stretched until January, when there was a runoff vote.

The documentary alleges that by tracking phone locations to the addresses of five alleged “stash house” nonprofits and 10 or more drop boxes, the “mules” were identified.

There were 242 people in Atlanta, Georgia, who fitted the bill; 200+ in Arizona; 100 in Milwaukee, Wisconsin; 500+ in Michigan, and 1,000+ mules in Philadelphia, Pennsylvania – totaling over 2,000 “mules”.

Viewers were then shown multiple surveillance footage clips of different people at drop boxes, which the documentary said it had identified as some of the ballot traffickers carrying out their crimes.

Multiple concerns were raised by experts speaking to Reuters about the “geotracking” portion of the documentary. It was unclear whether the same test was applied anywhere other than the swing states in question (to prove a unique phenomenon had happened), along with data validity, accuracy, and discussion about other possibilities that could explain the findings.

“The entirety of the claim rests on cell phone location data, which doesn’t remotely show that people were actually using the drop boxes (it doesn’t have the granularity to show that, as opposed to just walking or even driving by),” said Kenneth R Mayer, Professor of Political Science at the University of Wisconsin-Madison, who spoke to Reuters via email.

According to True the Vote founder Catherine Engelbrecht, who spoke in the documentary, the dataset had been validated because it was used by the organization to solve two murder cases that were “ebbing on cold case status”.

Only one murder case was detailed as an example in the documentary – that of eight-year-old Secoria Turner on July 4, 2020, in Atlanta – and which authorities told NPR was solved without anything to do with Engelbrecht ([here](#)).

D’Souza, meanwhile, claimed without offering evidence that the dataset had the “reliability of a fingerprint”, expanding in a later podcast interview that it was accurate to between “12 and 18 inches” ([here](#)).



Experts speaking to Reuters disagreed.

“I have never heard that geotracking using cell phones could have errors as low as 12-18 inches,” said Chen Qian, Associate Professor at the Department of Computer Science and Engineering at University of California, Santa Cruz. “This range is way below the ranges reported by scientists and engineers.

“A research paper written by AT&T and Purdue University researchers in 2020 predicted that the average location error of 5G networks would vary from 2 meters to >10 meters,” said Qian. “Note their results are simulated results in ideal settings, used for predictions. They are not real experiments, because 5G has not been available everywhere. In real environments the errors would be larger.” ([here](#))

Moreover, drop boxes tend to be in high-traffic areas such as public libraries, shopping malls, municipal buildings, or schools. For example, a map of drop boxes in the five metro Atlanta counties of Fulton, DeKalb, Cobb, Gwinnett and Clayton shows that all are clustered in busy locations likely to have high cell phone activity ([here](#)).

“My local drop box is in my public library, a location I pass probably 20 or 30 times a week,” said Paul Gronke, Director of the Elections and Voting Information Center at Reed College in Oregon (evic.reed.edu/). “Did I deposit 20 ballots or is my drop box on a heavily trafficked street? You tell me.”

True the Vote said in the documentary it had ruled out people where it believed their “pattern of life” outside the election period involved travelling to nonprofits and drop box locations. They did not offer information on how they did this or who these people were.

However, Barry C Burden, Director of the Elections Research Centre at the University of Wisconsin- Madison (elections.wisc.edu/), told Reuters via email that there were still acceptable reasons for observed heightened activity during election periods.

He said: “Some of the individuals tracked might even have been election workers checking on or emptying the drop boxes, so it would be a sign of vigilance by election officials rather than nefarious behavior.”

SURVEILLANCE VIDEO

To corroborate the geotracking dataset, True the Vote said it had compared it with surveillance video covering locations of some of the drop boxes.

They claimed to have access to 4 million minutes of footage, which was mostly from Georgia. The documentary makers said some of the surveillance cameras were turned off in Arizona and that there was no footage from Wisconsin. No information was provided about surveillance footage from Michigan or Pennsylvania.

Reuters was unable to examine these alleged minutes of footage, but the videoclips presented in the documentary alone do not provide proof of fraud.

When Reuters asked Engelbrecht via email how “mules” identified via geotracking data were then matched to surveillance footage, she responded: “Matches are made by comparing the location and time stamp of the video to the location and the time stamp of the individual device.”

The documentary shows several surveillance clips said to reveal “mules” stuffing fake ballots in the drop boxes. Case 3:22-cv-08196-MFL Document 11-10 Filed 10/28/22 Page 13 of 122

In one clip, a couple of ballots appear to drop to the floor as one man goes to post; the documentary makers suggest this is suspicious, as well as the man allegedly posting the ballots late at night.

In another, a woman wearing a face mask and gloves is seen posting a ballot before turning to place her gloves in a nearby bin. It is claimed in the documentary that she is a “mule” because she was wearing gloves (to hide her fingerprints) and did not look at the bin, so must have had prior knowledge of it being there. The documentary makers did not appear to consider the possibility that the woman was wearing gloves, along with her face mask, as a personal protective measure against COVID-19.

The unidentified woman was also said to have visited “dozens and dozens” of drop boxes; however, no other clips of her, nor any further evidence, were shown.

Two other clips show men in separate locations taking photos of themselves posting their ballot, which the documentary makers allege was to provide evidence of the job done so the “mules” can get paid.

In a Fox News interview, Engelbrecht claimed the average number of visits by a “mule” to a drop box was 38 ([here](#)). Yet none of the surveillance videos showed the same person more than once.



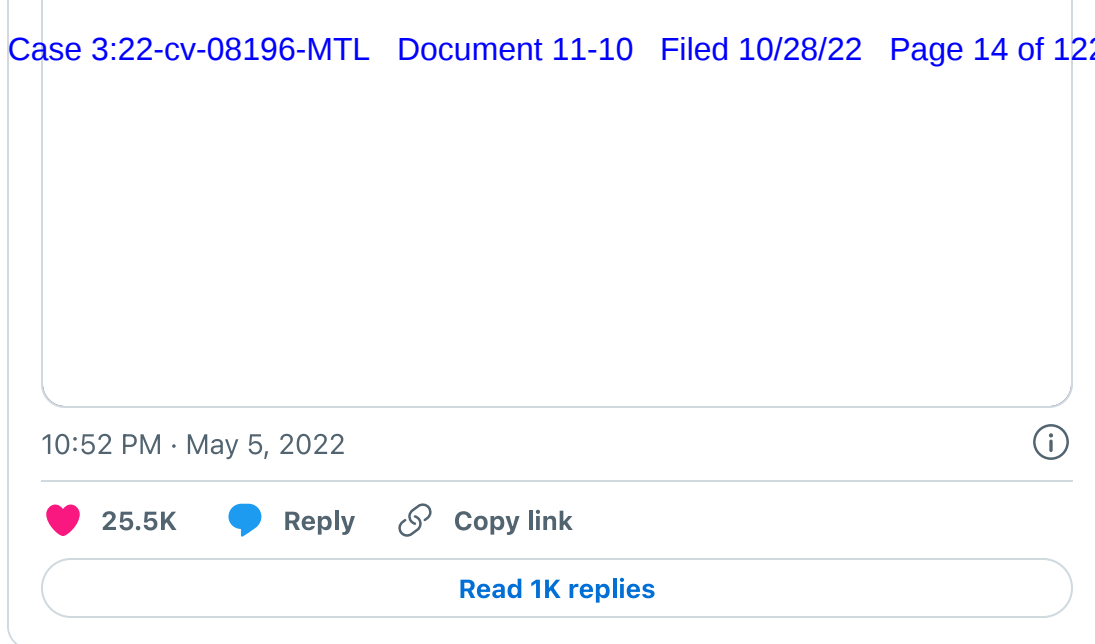
Liz Harrington
@realLizUSA · [Follow](#)



The average ballot trafficker made 38 TRIPS to drop boxes.

And it's on tape!

[Watch on Twitter](#)



BALLOT HARVESTING VS FRAUDULENT BALLOTS

Some of the people in Georgia who were presented in surveillance footage as so-called “mules” were seen posting more than one ballot at once, which the documentary makers suggested was proof of voter fraud.

But this doesn’t necessarily constitute fraud. Ballot harvesting, the posting of completed ballots on behalf of a third party, is legal in several states, including Georgia ([n-there](#)).

“Some of the so-called “mules” might have been legitimate family members putting in ballots in Georgia,” said Theodore Allen, Associate Professor at Ohio State University, specializing in the administering of elections.

“Many people need encouragement to vote and offering to collect and bring to ballot boxes is, in many states, a legal and legitimate way to increase voter participation which is often low.”

Reuters also spoke to M.V. (Trey) Hood III, Professor in the Department of Political Science at the University of Georgia, to understand the legality around dropping off

conflated, and there are protections in place in Georgia to prevent the posting of fraudulent ballots.

“[In Georgia] In 2020 we were using signature verification to verify absentee ballots, so there were safety mechanisms in place to ensure it wasn’t a fraudulent ballot.”

He added: “I haven’t seen any hard evidence being offered up that these ballots were fraudulent.”

Reuters looked into a video posted in May claiming to show one such “mule”.

Pennsylvania county authorities debunked the “evidence” by confirming it showed a designated agent dropping ballots off on behalf of individuals who are unable to ([here](#)).

Ultimately, ‘2000 Mules’ speculates that the so-called ballot-traffickers were dropping off fraudulent ballots – but the film does not prove this. The ‘faked’ ballots were never opened and inspected, nor were the suspected “mules” on surveillance questioned, aside from one anonymous “informant” who says she never saw inside the supposed fraudulent ballots.

COULD BALLOTS BE FORGED?

The documentary claims its investigation reveals the potential existence of 380,000 overall fraudulent ballots. And, it claims, if all of these contained falsified votes for Joe Biden, the revelation is significant enough to have blocked a win by Donald Trump.

Listing all of the steps needed to falsify a ballot, Gronke told Reuters: “1) You need a falsified ballot with a unique bar code, printed on special paper, and a special

envelope. If the claim is that you've somehow obtained 400,000 original ballots without the elections officials or voters knowing, how precisely did you do this?

“2) You need to successfully forge the voter’s signature. 3) You need to deposit the envelope and have it validated by a local official.

“Congratulations! Besides committing a felony, you have now cast ONE fraudulent ballot. Now you need to figure out how to do that hundreds of thousands of times, in different jurisdictions, with different ballot styles and different voting materials.”

Gronke’s sentiments were echoed by Christopher B. Mann, Associate Professor of Political Science at Skidmore College, who told Reuters: “If there are 400,000 people who had their ballot collected and returned for nefarious reasons, there should be significant numbers of people willing to tell their story. It is hard for two people to keep a secret. Asserting that 400,000 people are keeping a secret is beyond credibility.”

Reuters has previously explored the safeguards in place that make forging ballots on behalf of others difficult ([here](#)), ([here](#)).

2020 ELECTION FOUND SAFE AND SECURE

False claims pedaled by former U.S. President Donald Trump and his followers blaming widespread voting fraud for the 2020 election results have been rejected by courts, state governments and members of his own former administration ([here](#)).

U.S. election security officials have said the election was “the most secure in American history” ([here](#)), ([here](#)).



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NEW: A joint statement from the Elections Infrastructure

Government Coordinating Council and Sector Coordinating Council Executive Committees regarding the 2020 general election:

[nased.org/news/jointstat...](#)

[#TrustedInfo2020](#) [#Protect2020](#)

5:47 PM · Nov 12, 2020

247 Reply Copy link

[Read 35 replies](#)

Former U.S. Attorney General William Barr, the nation’s top law enforcement official under Trump, said on Dec. 1, 2020, that he had not seen any evidence of fraud that would have changed the election results ([here](#)).

Furthermore, more than 50 lawsuits brought by Trump or his allies alleging election fraud or other irregularities were dismissed by state and federal judges ([here](#)).

VERDICT

The documentary “2000 Mules” does not provide any concrete, verifiable evidence of widespread voter fraud in the 2020 election. Technology and election integrity experts consulted by Reuters also did not find the geolocation, surveillance or any other information presented showed plausible evidence of fraud.

This article was produced by the Reuters Fact Check team. [Read more about our fact-checking work here](#) .

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All quotes delayed a minimum of 15 minutes. See [here](#) for a complete list of exchanges and delays.

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Exhibit B

US MARKETS CLOSED In the news

▼ Dow Jones +0.61% ▲ Nasdaq -1.88% ▲ S&P 500 -0.61% ▲ META -24.56% ▼ TSLA +0.2%

HOME > POLITICS

Former AG Bill Barr laughs at Dinesh D'Souza's election conspiracy theory film '2000 Mules' in January 6 Committee deposition

Grace Panetta Jun 13, 2022, 1:16 PM



US Attorney General Bill Barr is pictured on October 15, 2020. [Jeff Roberson/Pool/AFP via Getty Images](#)

Former AG Bill Barr mocked and trashed the conclusions of film "2,000 Mules."

The film, made by Dinesh D'Souza and True The Vote, claims fraud took place at ballot drop boxes.

Barr called the film, which has also been panned by experts, as "unimpressive" and "indefensible."

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Former Attorney General Bill Barr mocked the premise of "2000 Mules," a conspiratorial movie that purports to show massive fraud with ballot dropboxes in the 2020 election. The film has been widely panned by experts and fact-checkers.

The committee's hearing on Monday focused on the election lies President Donald Trump Trump and his allies spread to discredit the 2020 election results. The hearing featured extended clips from Barr's sworn deposition before the committee.

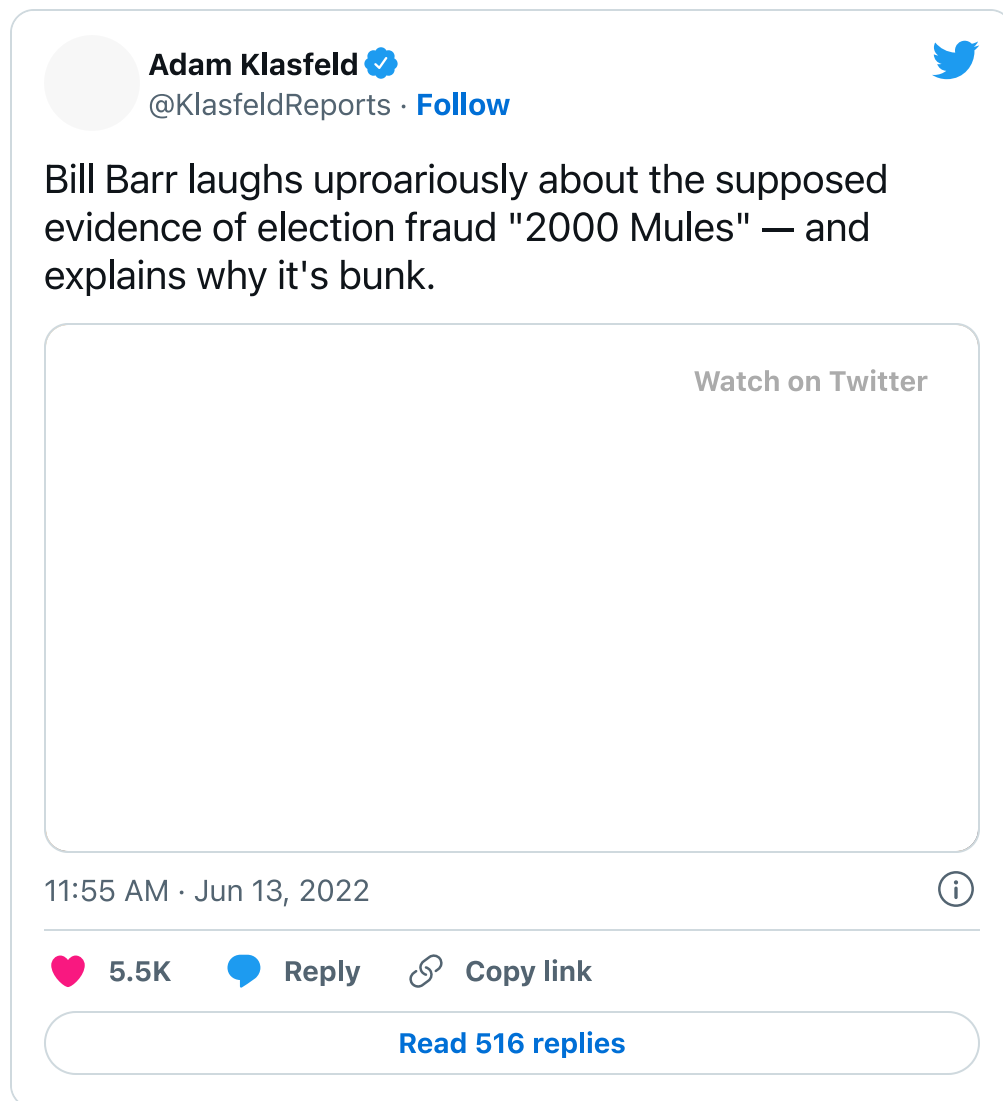
"The election was not stolen by fraud, and I haven't seen anything since the election that changes my mind on that, including the '2000 Mules' movie," Barr said in his deposition, laughing.

The film, made by conservative activist Dinesh D'Souza and conservative election-focused group True The Vote, uses surveillance footage, photographs, and geolocation data from cellphones in key swing states to argue that people -- the "mules" -- committed election fraud by essentially stuffing ballot dropboxes with fraudulent ballots.


But election experts say that the evidence presented by the filmmakers isn't enough to show widespread improper activity with dropboxes, much less a conspiracy to steal the election.

"The [Georgia Bureau of Investigation] was unimpressed with it. I

"The cellphone data is singularly unimpressive," Barr added. "Basically, if you take 2 million cellphones and figure out where they are physically in a big city like Atlanta or wherever, by definition, you're going to find many hundreds of them that have passed by and spent time in the vicinity these boxes. And the premise that if you go by five boxes or whatever it was, that that's a mule, is indefensible."






A screenshot of a tweet from Adam Klasfeld (@KlasfeldReports). The tweet text reads: "Bill Barr laughs uproariously about the supposed evidence of election fraud '2000 Mules' — and explains why it's bunk." Below the text is a video player with the text "Watch on Twitter". The tweet is dated 11:55 AM · Jun 13, 2022. It has 5.5K likes, a reply icon, and a copy link icon. At the bottom, there is a button that says "Read 516 replies".

Adam Klasfeld 
@KlasfeldReports · [Follow](#)

Bill Barr laughs uproariously about the supposed evidence of election fraud "2000 Mules" — and explains why it's bunk.

Watch on Twitter

11:55 AM · Jun 13, 2022

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The Associated Press' in-depth fact check of the movie described the film as "based on faulty assumptions, anonymous accounts and improper analysis of cellphone location data, which is not precise

enough to confirm that somebody deposited a ballot into a drop box, according to experts." Case 3:22-cv-08196-MTL Document 11-10 Filed 10/28/22 Page 23 of 122

One reason that cellphone data is an imperfect measure of how many ballots are dropped off at a dropbox is that many ballot dropboxes are located in high-trafficked, easily-accessible public spaces like libraries, town halls and other government buildings, and even grocery stores.

President Donald Trump's spokeswoman Liz Harrington also asserted that the cellphone data collected by the makers of "2,000 Mules" helped solve the murder of a young girl in Atlanta, a claim discredited by True the Vote themselves, who acknowledged to NPR they contacted law enforcement two months after arrests had already been made in the murder.

Barr described the photographic evidence in the film as "lacking" and noted that even if the filmmakers *had* shown that so-called ballot harvesting occurred, it wouldn't be enough to prove that those votes were fraudulent or would have swung the result of the election.

"Courts are not gonna throw out votes and then figure out what votes are harvested and throw them out," Barr said in his deposition. "The burden is on the challenging party to show that illegal votes were cast, that the votes were the result of undue influence or bribes...absent that evidence, I didn't see courts throwing out votes anyway."

D'Souza slammed the committee and Barr in a number of tweets, calling Barr ignorant and "a fat guy."

"The debunkers have themselves been thoroughly debunked. And all of them are too cowardly to debate the issue with me. As is the January 6 Committee." D'Souza wrote in a subsequent tweet.

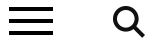
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POLITICS

Arizona AG asks the FBI to investigate the group behind the right-wing election conspiracy theory film '2000 mules'

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Exhibit C



LEGAL

Arizona AG's office asks feds to investigate conservative nonprofit True the Vote

The group propagated claims of vote fraud by relying on geolocation data, which became the central focus of the movie "2000 Mules."



The letter, dated Friday, is particularly remarkable coming from the office of Brnovich, a Republican who once vied for Trump's support in a Senate GOP primary bid that hinged on false claims about the 2020 election results. | Bob Christie/AP Photo

By **KYLE CHENEY** and **NICHOLAS WU**

10/14/2022 10:00 PM EDT



The office of Arizona Attorney General Mark Brnovich is asking the FBI and IRS to investigate True the Vote, a conservative vote-monitoring nonprofit

Reginald Grigsby, an investigator with Brnovich's office, [described a series of questionable interactions](#) with the group's leaders and suggested there may be evidence of financial improprieties if the agencies pursued them.

"Given TTV's status as a nonprofit organization, it would appear that further review of its financials may be warranted," Grigsby wrote.

The letter, dated Friday, is particularly remarkable coming from the office of Brnovich, a Republican who once vied for Trump's support in a Senate GOP primary bid that hinged on false claims about the 2020 election results.

The IRS and the FBI's Phoenix field office did not immediately respond to requests for comment. A True the Vote spokesperson could not immediately be reached for comment.

Grigsby urged the federal agencies to pursue the group after what it described as multiple suspicious interactions with leaders Catherine Engelbrecht and Gregg Phillips. Grigsby said the pair met with state investigators three times since early 2021 and promised to provide data it said would prove widespread fraud in the 2020 election — but the evidence never arrived.

Even though the group never turned over the promised data, Grigsby wrote, it began publicly claiming that it had given the state a hard drive — a claim Grigsby indicated the group also made to the Arizona Senate and to the Phoenix office of the FBI.

"Not only is this patently false, TTV acknowledged via correspondence and during a meeting with them that they had not given us the information but that they would," he wrote.

True the Vote propagated claims of vote fraud by relying on geolocation data, which became the central focus of the movie "2000 Mules." Trump has cited the movie as proof the election was stolen, and he's praised the group's work. But the movie's claims have been sharply called into question by federal investigators and researchers who have tested its theories.

Former Attorney General Bill Barr delivered a forceful rebuke of the movie's premise in testimony to the Jan. 6 select committee. He told the panel that in any metropolitan area, geolocation data would likely show "hundreds" of people who passed by drop boxes on multiple occasions.

"The premise that if you go by a box, five boxes or whatever it was, you know that that's a mule is just indefensible," Barr said, adding, "It didn't establish widespread illegal harvesting," Barr said.

Despite Barr's mockery of the premise, Trump has promoted its claims both online and during his public events.

In an April 2022 meeting, Grigsby said the group claimed to have evidence of "243 mules" who had stuffed ballot boxes in Arizona. But they presented no hard evidence to back it up, he said.

In his most recent meeting with the group on June 1, Grigsby said Engelbrecht and Phillips indicated they had shared all their data with the FBI and were working with the bureau as informants. But he said the FBI's Phoenix field office quickly confirmed this to be false and said the group had, in turn, told FBI agents to contact Brnovich's office to obtain their data.

Grigsby also flagged the nonprofit status of the organization, noting the "considerable sums of money" they had raised while alleging massive voter fraud and promises to provide law enforcement with the information — even as they remained unable to provide the information.

FILED UNDER: FBI, ARIZONA, DONALD TRUMP, DONALD TRUMP 2020, 2020 PRESIDENTIAL CANDIDATES, 2020 ELECTIONS,



Huddle

A play-by-play preview of the day's congressional news



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Exhibit D



Washington, D.C.

United States District Court for the District of Columbia

Case No. 22-cv-01234

Date: 10/28/22

ORDER

The Court has reviewed the motion for summary judgment filed by the Defendant and the supporting materials. The Court finds that the Defendant has established that there is no genuine issue of material fact regarding the Defendant's motion for summary judgment. Therefore, the Court grants the Defendant's motion for summary judgment.

IT IS ORDERED that the Defendant's motion for summary judgment is granted.

IT IS FURTHER ORDERED that the Plaintiff's motion for summary judgment is denied.

The Court notes that the Plaintiff has failed to establish that there is a genuine issue of material fact regarding the Defendant's motion for summary judgment. The Court finds that the Plaintiff's motion for summary judgment is without merit. Therefore, the Court denies the Plaintiff's motion for summary judgment.

The Court also notes that the Defendant has established that there is no genuine issue of material fact regarding the Defendant's motion for summary judgment. The Court finds that the Defendant's motion for summary judgment is well-founded. Therefore, the Court grants the Defendant's motion for summary judgment.

The Court further notes that the Plaintiff has failed to establish that there is a genuine issue of material fact regarding the Defendant's motion for summary judgment. The Court finds that the Plaintiff's motion for summary judgment is without merit. Therefore, the Court denies the Plaintiff's motion for summary judgment.

The Court concludes that the Defendant has established that there is no genuine issue of material fact regarding the Defendant's motion for summary judgment. The Court finds that the Defendant's motion for summary judgment is well-founded. Therefore, the Court grants the Defendant's motion for summary judgment.

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Exhibit E

Technology

“Big Lie” Vigilantism Is on the Rise. Big Tech Is Failing to Respond.

Stolen-election activists and Trump supporters have embraced a new tactic in their campaign to unearth supposed proof of fraud in the 2020 presidential race: using social media to chase down a fictional breed of fraudster known as a “ballot mule.”



Alex Bandoni/ProPublica. Source Image: Mark Makela/Getty Images.

by **Andy Kroll**

June 17, 12 p.m. EDT

ProPublica is a nonprofit newsroom that investigates abuses of power. Sign up to receive [our biggest stories](#) as soon as they're published.

Update, June 21, 2022: Spokespeople for Facebook, TikTok and Twitter said they would remove posts flagged by ProPublica for violating their respective community standards policies. This story has also been updated to include comment from True the Vote, which the organization sent after our story published.

The dummied-up flyer bore the hallmarks of a real WANTED poster. A grainy photo of a woman outside an election office in the suburbs of Atlanta stamped with the word “WANTED.” An image of a sheriff’s badge and the phone number for the Gwinnett County Sheriff’s Office. The implication was clear: The woman was being sought by the local sheriff for voter fraud.

The flyer was fake, and though the sheriff’s office eventually called it out, the false poster went viral, amassing tens of thousands of shares, views and threatening comments on Facebook, Twitter and TikTok and raising fears that harm could come to the unidentified woman.

Stolen-election activists and supporters of former President Donald Trump have embraced a new tactic in their ongoing campaign to unearth supposed proof of fraud in the 2020 presidential race: chasing down a

Inspired by a conservative documentary film that has won praise from Trump and his allies — and debunking from critics including former Attorney General William Barr — self-styled citizen sleuths are posting and sharing photos of unnamed individuals and accusing them of election crimes. They are calling on their followers to help identify these “ballot mules,” who are accused of having violated laws against dropping off multiple absentee ballots during the 2020 election. A state lawmaker in Arizona has even encouraged people to act as “vigilantes” and catch future “mules.”

Promoting such false information violates the policies of Facebook, Twitter and TikTok. Facebook’s [“Community Standards”](#) says its policy is to remove content that incites harassment or violence or impersonates government officials. [Twitter](#) and [TikTok](#) have similar rules and guidelines for what can and can’t appear on their platforms.



Screenshot captured and redacted by ProPublica

ProPublica identified at least a dozen additional posts on Twitter, Facebook and TikTok that accuse unnamed individuals of being “ballot mules” and engaging in allegedly illegal activity. Some of these posts echo the “WANTED”-style language seen in the Gwinnett County meme, while others include similar calls to action to identify the individuals.

None of the posts reviewed by ProPublica include evidence that any of the people depicted in the posters engaged in illegal activity. Yet the social media companies have reacted slowly or not at all to such posts, some of which clearly violate their policies, experts say.

Disinformation researchers from the nonpartisan clean-government nonprofit Common Cause alerted Facebook and Twitter that the platforms were allowing users to post such incendiary claims in May. Not only did

the claims lack evidence that crimes had been committed, but experts worry that poll workers, volunteers and regular voters could face unwarranted harassment or physical harm if they are wrongfully accused of illegal election activity.

So far, there is no sign that any of the people depicted have been identified or suffered any threats.

Emma Steiner, a disinformation analyst with Common Cause who sent warnings to the social-media companies, says the lack of action suggests that tech companies relaxed their efforts to police election-related threats ahead of the 2022 midterms.

“This is the new playbook, and I’m worried that platforms are not prepared to deal with this tactic that encourages dangerous behavior,” Steiner said.

Spokespeople for Facebook, TikTok and Twitter said they would remove posts flagged by ProPublica for violating their respective community standards policies.

Thirty-one states allow a third party to collect and return an absentee or mail-in ballot on behalf of another voter. These laws help voters who are disabled or infirm, live in spread-out rural areas or reside on tribal lands with limited access to polling places or ballot drop boxes. In states with a history of absentee voting, both Democratic and Republican operatives have engaged in organized ballot-collection drives.

Critics, labeling the practice “ballot harvesting,” have sought to restrict its use, warning about the potential for fraud. However, incidents of proven fraud related to ballot collection are extremely rare. A database maintained by the conservative Heritage Foundation identifies just 238 cases of “fraudulent use of absentee ballots” since 1988. One high-profile case of fraud involving absentee ballots occurred in a 2018 North Carolina congressional race. A Republican operative engaged in a ballot-tampering scheme involving hundreds of ballots. The state election board later threw out the election result and ordered a redo. It was likely the first federal election overturned due to fraud, according to historians and election-law experts.

The phrases “ballot mules” and “ballot trafficking” — with their intentional echoes of the language of drugs and cartels — started to gain traction online in 2021, according to Mike Caulfield, a misinformation researcher at the University of Washington’s Center for an Informed Public. An analysis by Caulfield and his colleagues found that prominent Republicans including House Minority Leader Kevin McCarthy and Republican National Committee Chairwoman Ronna Romney McDaniel invoked “ballot trafficking” last spring.

But it wasn’t until conservative provocateur Dinesh D’Souza and a discredited conservative group called True the Vote last fall began to tease findings that would later appear in D’Souza’s movie “2000 Mules” that uses of “ballot trafficking” and “ballot mules” shot up, according to Caulfield’s research.

The “2000 Mules” film claims that a network of thousands of people illegally stuffed ballot boxes in swing states to steal the presidency for Joe Biden. It draws heavily on the work of True the Vote, which purported to use surveillance footage and geolocation data to make its claims of illegal ballot activity.

True the Vote founder Catherine Engelbrecht said her group had never spoken with Barr and disputed the notion that True the Vote had not proven its claims about voter fraud. “I do think that when 80%+ of America is concerned about election integrity, something must be done to address the situation,” she said. “It is the failure of leaders across all branches of government, who have allowed lawlessness to be the new law, that we find ourselves where we do.” D’Souza did not respond to a request for comment.

Despite its flimsy conclusions, “2000 Mules” found an enthusiastic audience in Trump and his supporters. In early May, Trump screened the film at his Mar-a-Lago private club. The film has since earned nearly \$1.5 million at the box office, according to Box Office Mojo. In a recent 12-page letter responding to the public hearings organized by the Jan. 6 select committee, Trump cited “2000 Mules” nearly 20 times.

As the film’s dubious claims have spread online, stolen-election activists are creating and sharing online content purporting to reveal more “mules” and accusing those individuals of illegal behavior without actual evidence of wrongdoing.

The most striking example is the meme that depicts an older white woman leaving a ballot drop box in Georgia’s suburban Gwinnett County. The word “WANTED” appears above her head as does the image of a sheriff’s badge labeled “Gwinnett County” and the sheriff office’s phone number.

“Ballot mule,” the meme says. “If you can ID her, call Gwinnett Co. sheriff’s office.”

A spokeswoman for the Gwinnett County Sheriff’s Office says the meme is fake. The sheriff’s office hasn’t received calls purporting to identify the woman. The spokeswoman said that the office was investigating who created the meme.

ProPublica was unable to identify the woman in the “WANTED” meme. A spokesman for the Gwinnett County elections office confirmed that the name tag worn by the woman in the meme matched those worn by county election workers in 2020. He also verified that the drop box in the video was located outside of the county’s election headquarters.

The origins of the woman’s photo in the “WANTED” meme appear to point back to a Georgia businessman and self-described election-fraud investigator named David Cross.

For months Cross has posted short clips of surveillance footage showing people depositing ballots at drop boxes in Gwinnett County. Cross sometimes narrates these videos and makes unverified accusations of illegal ballot harvesting. In a clip that Cross posted online on May 3, an older white woman — the same woman in the “WANTED” meme — deposits multiple ballots into the drop box outside the headquarters for Gwinnett County’s elections office. In his narration, Cross accuses the woman of depositing as many as 35 ballots, though it’s not at all clear from

the video exactly how many ballots the woman deposited. “Totally illegal,” he says in the video. (Cross did not respond to requests for comment.)

Georgia law prohibits many third parties from submitting a ballot that’s not their own. However, the law makes exceptions for caregivers for the elderly and the disabled, immediate family members, members of the same household, in-laws, nieces, nephews, grandchildren and more.

Cross, the Georgia activist, has filed complaints with the State Election Board and secretary of state’s office alleging illegal ballot deliveries and citing his surveillance footage clips. Last month, the State Election Board dismissed three complaints alleging “ballot harvesting” after an investigation by the secretary of state’s office found that the alleged “mules” were voters dropping off ballots for themselves and family members.

A spokesman for Georgia Secretary of State Brad Raffensperger told ProPublica that the office has a pending investigation into the woman in the “WANTED” meme. The spokesman, Walter Jones, stressed that no one should assume that an individual shown in a video delivering multiple ballots is automatically guilty of a crime, nor would the ballots in question be invalidated even if someone had violated the state’s ballot-collection law.

The video published by Cross of the woman at the Gwinnett County drop box spread rapidly online. Twitter users accused the woman of being one of the “2000 mules” and urged their followers to “MAKE HER FAMOUS!” — in other words, reveal her identity and share it widely.

One Twitter user shared the woman’s image with the “WANTED” text and the fake Gwinnett County sheriff’s badge. “Once we find out who paid these people the whole story will become clear,” the account wrote. That tweet amassed more than 9,000 retweets and more than 14,000 likes before Twitter removed it.

The “WANTED” post spread across Twitter, Facebook and TikTok. A Facebook group called “Celebrities for Trump” shared it. “We need more if [sic] these,” the post said, referring to the WANTED sign. “Keep your eyes open. Report them all it is a crime.”

Several days after the “WANTED” flyer surfaced and reached a large audience, the Gwinnett County sheriff stated that the post was “false.” Yet despite the post impersonating a law-enforcement agency, social-media companies have been slow to remove it.

While Twitter removed dozens of posts with the “WANTED” sign, ProPublica was able to find instances of it still on the platform.

Disinformation researchers tell ProPublica that they also identified posts accusing people of being ballot mules in other states with laws that restrict third parties from submitting people’s ballots. “Mule right here in PA,” one TikTok post read. “Make this Upper Dublin resident famous #2000Mules #2000MulesDocumentary #2000MulesTheMovie.”

In Arizona, a Republican state senator named Kelly Townsend has encouraged people to camp out at ballot drop boxes and write down license plate numbers of people deemed to be suspicious. “I have been so pleased to hear of all you vigilantes that want to camp out at these drop boxes,” Townsend recently said. “So, do it. Do it.”

Even if “2000 Mules” were accurate — which experts stress it almost certainly is not — the ballot trafficking theory put forward by the film would not change the result of any election. Rick Hasen, a professor and election-law expert at the University of California, Irvine, says he believes the rigged-election message in “2000 Mules” is just the latest attempt to more broadly lay the groundwork for challenging and overturning the outcome of a future election.

“If you believe the last election was stolen, you’re going to be more likely to take steps to steal the next one back,” Hasen said. “It’s pretty obvious that what’s going on here is using false claims of fraud as a potential pretext to engage in election subversion in 2024 or another future election. That’s very dangerous for American democracy.”

Do you have information about election disinformation, voter suppression or other threats to democracy? We want to hear from you. Fill out our [questionnaire](#) or contact reporter Andy Kroll directly at andy.kroll@propublica.org or via [Signal](#) or [WhatsApp](#) at 202-215-6203.

Filed under —
Technology
Democracy

Andy Kroll

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Exhibit F

Democracy Challenged: A Look at the Historic Test on Democratic Norms >

Hunting for Voter Fraud, Conspiracy Theorists Organize ‘Stakeouts’

A nascent effort to surveil drop boxes for potential fraud is taking shape in at least 10 states, worrying election officials and law enforcement.



By Tiffany Hsu and Stuart A. Thompson

Aug. 10, 2022

One night last month, on the recommendation of a man known online as Captain K, a small group gathered in an Arizona parking lot and waited in folding chairs, hoping to catch the people they believed were trying to destroy American democracy by submitting fake early voting ballots.

Captain K — which is what Seth Keshel, a former U.S. Army intelligence officer who espouses voting fraud conspiracy theories, calls himself — had set the plan in motion. In July, as states like Arizona were preparing for their primary elections, he posted a proposal on the messaging app Telegram: “All-night patriot tailgate parties for EVERY DROP BOX IN AMERICA.” The post received more than 70,000 views.

Similar calls were galvanizing people in at least nine other states, signaling the latest outgrowth from rampant election fraud conspiracy theories coursing through the Republican Party.

In the nearly two years since former President Donald J. Trump catapulted false claims of widespread voter fraud from the political fringes to the conservative mainstream, a constellation of his supporters have drifted from one theory to another in a frantic but unsuccessful search for evidence.

Many are now focused on ballot drop boxes — where people can deposit their votes into secure and locked containers — under the unfounded belief that mysterious operatives, or so-called ballot mules, are stuffing them with fake ballots or otherwise tampering with them. And they are recruiting observers to monitor countless drop boxes across the country, tapping the millions of Americans who have been swayed by bogus election claims.

In most cases, organizing efforts are nascent, with supporters posting unconfirmed plans to watch local drop boxes. But some small-scale “stakeouts” have been advertised using Craigslist, Telegram, Twitter, Gab and Truth Social, the social media platform backed by Mr. Trump. Several websites dedicated to the cause went online this year, including at least one meant to coordinate volunteers.

Some high-profile politicians have embraced the idea. Kari Lake, the Trump-endorsed Republican candidate for governor in Arizona, asked followers on Twitter whether they would “be willing to take a shift watching a drop box to catch potential Ballot Mules.”

Supporters have compared the events to harmless neighborhood watches or tailgate parties fueled by pizza and beer. But some online commenters discussed bringing AR-15s and other firearms, and have voiced their desire to make citizens’ arrests and log license plates. That has set off concerns among election officials and law enforcement that what supporters describe as legal patriotic oversight could easily slip into illegal voter intimidation, privacy violations, electioneering or confrontations.

“What we’re going to be dealing with in 2022 is more of a citizen corps of conspiracists that have already decided that there’s a problem and are now looking for evidence, or at least something they can twist into evidence, and use that to undermine confidence in results they don’t like,” said Matthew Weil, the executive director of the Elections Project at the Bipartisan Policy Center. “When your entire premise is that there are problems, every issue looks like a problem, especially if you have no idea what you’re looking at.”



Screenshot from Truth Social

Mr. Keshel, whose post as Captain K inspired the Arizona gathering, said in an interview that monitoring drop boxes could catch illegal “ballot harvesting,” or voters depositing ballots for other people. The practice is legal in some states, like California, but is mostly illegal in battlegrounds like Georgia and Arizona. There is no evidence that widespread illegal ballot harvesting occurred in the 2020 presidential election.

“In order to quality-control a process that is ripe for cheating, I suppose there’s no way other than monitoring,” Mr. Keshel said. “In fact, they have monitoring at polling stations when you go up, so I don’t see the difference.”

The legality of monitoring the boxes is hazy, Mr. Weil said. Laws governing supervision of polling places — such as whether watchers may document voters entering or exiting — differ across states and have mostly not been adapted to ballot boxes.

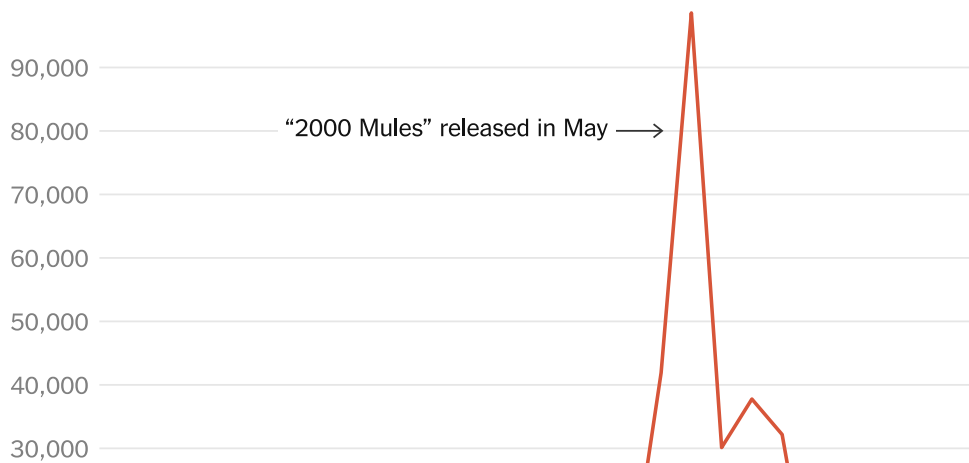
In 2020, election officials embraced ballot boxes as a legal solution to socially distanced voting during the coronavirus pandemic. All but 10 states allowed them.

But many conservatives have argued that the boxes enable election fraud. The talk has been egged on by “2000 Mules,” a documentary by the conservative commentator Dinesh D’Souza, which uses leaps of logic and dubious evidence to claim that an army of partisan “mules” traveled between ballot boxes and stuffed them with fraudulent votes. The documentary proved popular on the Republican campaign trail and among right-wing commentators, who were eager for novel ways to keep doubts about the 2020 election alive.

“Ballot mules” have quickly become a central character in false stories about the 2020 election. Between November 2020 and the first reference to “2000 Mules” on Twitter in January 2022, the term “ballot mules” came up only 329 times, according to data from Zignal Labs. Since then, the term has surfaced 326,000 times on Twitter, 63 percent of the time alongside discussion of the documentary. Salem Media Group, the executive producer of the documentary, claimed in May that the film had earned more than \$10 million.

Mentions of "ballot mules" surged in May after the debunked documentary "2000 Mules" claimed that an army of operatives stuffed ballot boxes during the 2020 election.

Digital mentions of "ballot mules" per week



Note: Includes mentions on digital platforms including social media, broadcast, traditional media, and other online sites. Source: Signal Labs • By The New York Times

The push for civilian oversight of ballot boxes has gained traction at the same time as legislative efforts to boost surveillance of drop-off sites. A state law passed this year in Utah requires 24-hour video surveillance to be installed at all unattended ballot boxes, an often challenging undertaking that has cost taxpayers in one county hundreds of thousands of dollars. County commissioners in Douglas County in Nebraska, which includes Omaha, voted in June to allocate \$130,000 for drop box cameras to supplement existing cameras that the county does not own.

In June, Arizona lawmakers approved a budget that included \$500,000 for a pilot program for ballot box monitoring. The 16 boxes included will have round-the-clock photo and video surveillance, rejecting ballots if the cameras are nonfunctional, and will accept only a single ballot at a time, producing receipts for each ballot submitted.

Many supporters of the stakeouts have argued that drop boxes should be banned entirely. Some have posted video tours of drop box sites, claiming that cameras are pointed in the wrong direction or that the locations cannot be properly secured.

Melody Jennings, a minister and counselor who founded the right-wing group Clean Elections USA, claimed credit for the Arizona gathering on Truth Social and said it was the group's "first run." She said in a podcast interview that any surveillance teams she organized would try to record all voters who used drop boxes. The primaries, she said, were a "dry run" for the midterms in November. Ms. Jennings did not respond to requests for comment.

After the Arizona gathering, organizers wrote to high-profile Truth Social users, including Mr. Trump, claiming without evidence that "mules came to the site, saw the party and left without dropping ballots." Comments on other social media posts about the event noted that the group could have frightened away voters wary of engaging, drawn people planning to report the group's activities or simply witnessed lost passers-by.

On Aug. 2, Ms. Lake and several other election deniers prevailed in their primary races in Arizona, where a GoFundMe campaign sought donations for "a statewide volunteer citizen presence on location 24 hours a day at each public voting drop box location." Kelly Townsend, a Republican state senator, said during a legislative

“I have been so pleased to hear about all you vigilantes out there that want to camp out at these drop boxes,” Ms. Townsend said.

Surveillance plans are also forming in other states. Audit the Vote Hawaii posted that citizens there were “pulling together watch teams” to monitor the drop boxes. A similar group in Pennsylvania, Audit the Vote PA, posted on social media that they should do the same.

In Michigan, a shaky video filmed from inside a car and posted on Truth Social showed what appeared to be a man collecting ballots from a drop box. It ended with a close-up shot of a truck’s license plate.

In Washington, a right-wing group launched Drop Box Watch, a scheduling service helping people organize stakeouts, encouraging them to take photos or videos of any “anomalies.” The group’s website said all its volunteer slots for the state’s primary early this month were filled.

The sheriff’s office in King County, Wash., which includes Seattle, is investigating after election signs popped up at several drop box sites in the state warning voters they were “under surveillance.”

One Gab user with more than 2,000 followers offered stakeout tips on the social network and on Rumble: “Get their face clearly on camera, we don’t want no fuzzy Bigfoot film,” he said in a video, with his own face covered by a helmet, goggles and cloth. “We need to put that in the Gab group, so there’s a constant log of what’s going on.”

Calls for civilian surveillance have expanded beyond ballot boxes. One post on a conservative blog cheers on people who monitor “any suspect activities before, during and after elections” at ballot-printing companies, vote tabulation centers and candidates’ offices.

Paul Gronke, the director of the Elections and Voting Information Center at Reed College, suggested that activists hoping for improved election security should push for more data transparency measures and tracking programs that allow voters to monitor the status of their absentee ballot. He said he had never heard of a legitimate example of dropbox watchdogs successfully catching fraud.

The prospect of confrontations involving self-appointed overseers largely untrained in state-specific election procedures, charged up by a steady diet of misinformation and militarized rhetoric, is “just a recipe for disaster” and “puts at risk the voters’ ability to cast their ballots,” Mr. Gronke said.

“There are ways to secure the system, but having vigilantes standing around drop boxes is not the way to do it,” he said. “Drop boxes are not a concern — it’s just a misdirection of energy.”

Cecilia Kang contributed reporting.

Exhibit G



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Operation: Drop Box



This Ballot Dropbox Is Under Surveillance

Accepting compensation for harvesting or depositing ballots may be a violation of Federal Law
(52 U.S. Code § 20511; 18 U.S. Code § 594)

Please report suspicious activity

Operation: Drop Box

In our endeavor to secure our election from those who would cause this country harm, we have created Operation: Drop Box. For the upcoming election, we plan on watching the ballot boxes throughout Yavapai County.

We are asking for patriots to take a two hour shift to watch election drop boxes,
and stop the ballot box stuffing!

Case 3:22-cv-08196-MTL Document 11-10 Filed 10/28/22 Page 49 of 122
We need coordinators for every one of the 19 boxes, and patriots to fill shifts for every day, for 27 open voting days!

Yes, it's a big job, and it can't be done without YOU! Sign up today.

If you can take more than one shift during the 27 days, that would be awesome!

Signup form for Operation: Drop Box.

Name *

First

Last

Email *

Phone *

Address *

Address Line 1

Address Line 2

City

State

Zip Code

Day and time you can watch

Location you can Watch *

Volunteer to be Town lead? *

- Yes
 No

Comments

Submit

We are going to be doing two-hour shifts at each drop box location with a minimum of two people at a time.

Bring a phone or a camera.

If you see someone putting more ballots in than their own, take a picture of them, their car, and their license plate.

Do NOT engage. Contact us and we'll get in touch with Sheriff Rhodes who is already aware of what we are doing and will do what he can.

[Click Here for the](#)



Drop Box Locations

Copyright © 2022 The Lions of Liberty

Website Design by Virtual Property Developer



Exhibit H

e-Edition

Join the Fall 2022 Healthcare Connections

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Ballot ‘drop watch’ won’t intimidate voters, says ‘Lion’



The board of the Lions of Liberty group. (Photo courtesy of Lions of Liberty)



By Vyto Starinkas

Originally Published: October 5, 2022 8:46 a.m.

Tweet



VERDE VALLEY – The Lions of Liberty group won't be intimidating voters when their volunteers are watching voters dropping ballots into Yavapai County drop boxes, including those in the Verde Valley, from Oct. 12 to the General Election, according to member Luke Cilano.

Even though Lions of Liberty are linked to sister groups like the Oath Keepers and the Yavapai County Preparedness Group, Cilano said they are not part of any national group.

“We started this here locally” in November of last year, he said.

The conservative group is based in Prescott, and members come from Chino, Prescott Valley, Dewey, and several from the Cottonwood side of the mountain. He said they have 250 people on their email list, a web page and hold meetings at the Prescott Vibe Event Center.

The Yavapai County Sheriff's Office is aware of the group's plan to “box watch” voters at drop boxes outside polling places during the upcoming election and he said it's legal as long they stay 75 feet away and don't intimidate people.

Cilano said ballot harvesting has a been problem in other parts of the country. He didn't know if it was in Yavapai County, but they decided “we're going to sit and we're going to watch the drop boxes.”

He believed another group was going on “ballot watch” in Maricopa County.

The Lions of Liberty volunteers will stand away from ballot boxes, observe and take a photo if they observe anything, he said.

They want to be in a position to see who is coming to the ballot box and how many ballots they are putting in there.

“If they are putting more ballots in there, we can take photo evidence and take to the sheriff,” Cilano continued. The only time they will take a photo is if they see anything amiss.

“I expect him to do his job,” if they turn over evidence to the sheriff, Cilano said. It is illegal in Arizona to put more than one ballot in the box other than your own, he pointed out.

That is not strictly true. State law does not limit how many secured ballots a person may drop off at a drop box for others as long as those "others" are their family members, other members of their household, or people for whom they are providing care.

On its webpage, the group was looking for volunteers to be in county towns with voting boxes, including Cottonwood, Camp Verde, Clarkdale, Jerome and VOC. Case 3:22-cv-08196-MTL Document 11-10 Filed 10/28/22 Page 55 of 122

Cilano said they are not arresting anyone, they are not engaging anyone and not getting in anyone's way, but they are observing from a distance. If anyone engages them, he has given strict orders for his volunteers to leave immediately and call local law enforcement.

“We’re not interested in altercations at all.”

Asked if the Lions of Liberty volunteers will be noticed, Cilano said he thought so since he has gotten death threats already.

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Exhibit I

VICE News

Armed Fringe Groups Are Gearing Up to 'Protect' Midterm Ballot Dropboxes

The groups, inspired by conspiracy theories and the Big Lie about the 2020 election, could deter some voters, experts warn.

TO By [Tess Owen](#)

October 6, 2022, 10:07am



SCREENSHOT OF A YCPT MEETING IN AUGUST LED BY JIM ARROYO, FORMER

ties to extremists, galvanized by conspiracy theories, are seeking to take matters into their own hands this election season.

Ballot dropboxes have become the central focus of election fraud conspiracy theorists, thanks to the debunked documentary *2,000 Mules*, by right-wing commentator Dinesh D'Souza.

That film claims that a shadowy network of hired “mules” in contested states were hired by nonprofits as part of a giant ballot trafficking operation to stuff dropboxes with fake absentee ballots, all with the goal of stealing the 2020 election from Donald Trump. The film was released in May, six months before the midterms, reinvigorated the “Stop the Steal” movement and inspired vigilante efforts around the country—in some cases spearheaded by innocuous-sounding groups that obscure the known ideologues and extremists behind them.

Lions of Liberty is the “political arm” of a newly-formed nonprofit called Yavapai County Preparedness Team (YCPT), led by the former vice president of Arizona’s Oath Keeper chapter, Jim Arroyo. At a meeting in August that was posted to YouTube, Arroyo explained that they had turned the Oath Keeper chapter into a corporate nonprofit under the name of YCPT, which in turn gave them the ability to get a bank account.

In an email to VICE News, Arroyo said that the Arizona chapter officially broke ties with the national leadership of the notorious militia group after it was implicated in the violent riot at the Capitol on Jan. 6. (Five members are currently standing trial for seditious conspiracy charges, including the group’s leader Stewart Rhodes. Prosecutors allege that Rhodes and his cohort plotted an “armed rebellion to shatter a bedrock of American democracy.”) However, they had been operating more or less independently from the national organization for about four years, said Arroyo; Rhodes broke ties with the Arizona contingent after they declined to assist in armed vigilante activities at the border, out of respect for Border Patrol.

particularly concerned about the period between midnight and 6 a.m. “If you saw the movie *2,000 Mules*” he said, that timeframe was “when the bulk of the problems happen, that’s when we will be on scene with a camera and flashlight.” Arroyo told VICE News that some volunteers might be armed. “This is Arizona; almost everyone is armed, all the time,” he said. “That's not a big deal here.”

**Do Look
Damning**

GREG WALTERS

10.05.22

Arroyo said he will likely pick up a couple of shifts to monitor dropboxes.

In the August meeting, Arroyo assured members of the crowd that they’d be welcome to continue wearing their Oath Keepers merch, even while conducting ballot dropbox surveillance. “Your shirts and hats are what tell the world you’re not ashamed to be an Oath Keeper, or afraid of the government just because of that crap that happened on January the 6th, which was completely staged. It was a setup,” Arroyo said, before acknowledging, “Yeah, they did something stupid beyond all belief.”

During the meeting, Arroyo also stoked fears of an imminent civil war. “This is not the same as (Black Lives Matter) and George Floyd or antifa. This is a direct confrontation with the federal government,” he said. “This is now the federal government of the United States of America in direct conflict with its own citizenry.”

The Lions of Liberty describe themselves as a “resolute nucleus of concerned, passionate conservative patriots who are determined to correct the course for our country which has been hijacked and undermined by global elites, communists, leftists, deep state bureaucrats, and fake news.” Their goal? “To bring God back to our leadership and win this spiritual battle for the soul of our nation.”

The Lions of Liberty aren’t the only ones calling for and coordinating vigilante activity around the midterm elections.

“The threat of groups of far-right vigilantes, some potentially armed, fueled by Big Lie misinformation, lurking near ballot dropboxes, could potentially deter some from casting their votes,” warned Burghart. “The possibility of conflict in such a scenario is real.”

Burghart added that “dropbox vigilantism” perpetuates unsubstantiated claims of rampant voter fraud that “keep the Big Lie alive and further erodes confidence in elections and democracy.”

Former Washington state Rep. Matt Shea runs On Fire Ministries, an apocalyptic Christian nationalist church in Spokane, and has been leading “training sessions” for prospective volunteers to monitor dropboxes.

“We are doing something for the community. How many of you watched *2,000 Mules*? Raise your hands,” said Shea during a service in September. “I think it would be good if we had some folks who were certified, trained, dropbox observers, in Spokane County.” The training took place on Sept. 30.

Shea is a particularly controversial character; a 2019 investigation by the Washington Legislature concluded that he’d “participated in an act of domestic terrorism” for his involvement in three armed conflicts against the federal government between 2014 and 2016, including the Bundys’ armed standoffs in Nevada and Oregon and an armed conflict with the U.S. Veterans Affairs Department in Priest River, Idaho.

And a group called True the Vote, which was involved in the *2,000 Mules* documentary, is also teaming up with the Constitutional Sheriffs and Peace Officers Association (CSPOA) to monitor dropboxes nationwide. CSPOA is headed by Richard Mack, who has long-standing ties to the militia movement, including to the Oath Keepers.

“The plan from national Big Lie groups, like True the Vote, is to use those “voter fraud” claims to get sympathetic sheriffs to intervene in elections,” said Burghart.

referencing QAnon posted a photo of their party to Trump's platform Truth Social, and credited Seth Keshel, a former U.S. Army intelligence officer and conspiracy theorist, for the idea.





SCREENSHOT FROM THE APP TRUTHSOCIAL SHOWING A "DROPBOX TAILGATE PARTY"

Brian Cates, a columnist for the fringe-right publication *The Epoch Times*, has long been a proponent of the “Big Lie” and has been riling up his more than 120,000 followers on Telegram around the idea of taking matters into their own hands this election season.

“The time for calling for people to just show up to vote is long past. We’re moving into another completely different era,” he wrote. “Citizens will be given the tools to monitor all the dropboxes and engage in massive real-time information operations in order to bring about election integrity.”

“Forewarned is forearmed,” he added. “An army of patriots is going to force compliance with the election laws in their states before these next elections are held.”

One of the primary examples of “evidence” of nefarious activity offered by 2,000 *Mules* was surveillance videos that appeared to show individuals posting multiple ballots into a dropbox, including in Georgia. Submitting multiple ballots on behalf of other people is known as “ballot harvesting,” and it is legal in several states, including Georgia.

However, the fact that submitting multiple ballots has been presented as a telltale sign of election fraud lays the groundwork for possible confrontations between dropbox “monitors” and people who are acting entirely within the law. (Right-wing political commentator Monica Matthews, from Clear Talk Media, even tried to remind her followers of this fact. “Before you all plan Dropbox tailgate parties to monitor the integrity of your elections—MAKE SURE you check your new state laws. Some states allow harvesting,” she wrote on Twitter in August. “Confronting people at dropboxes could land you in jail.”)

in Washington to drop off multiple ballots at once on behalf of family members.

The signs also had a QR code that allowed passersby to report “suspicious activity” to the King County Republican Party (whose chair disavowed the vigilante activity). Amber Krabach, a GOP activist, QAnon conspiracy theorist and member of the Kings County Republicans’ “Election integrity Committee”, was behind the signs. The county elections office asked the sheriff’s department to investigate whether Krabach had broken a state law barring civilians from influencing someone’s vote within 25 feet of a ballot dropbox. They didn’t press charges, but they did refer the matter to the FBI.

All these vigilante efforts are taking place against a backdrop of increasingly incendiary rhetoric from GOP figures and far-right forums alike, about what will happen if they get even so much of a whiff of “voter fraud” this election season.

“If our election systems continue to be rigged and continue to be stolen, then it’s going to lead to one place—and it’s bloodshed,” said ex-Congressman Madison Cawthorn at a GOP event in North Carolina this summer.

On Patriots.win, a pro-Trump forum, some have discussed the need to bring guns to monitor dropboxes. Someone shared an article from the right-wing Gateway Pundit claiming they’d found evidence of massive voter fraud in Detroit during the 2020 election. “We need people waiting for that shit this time and take that shit at gun point,” someone responded. “Use walkie-talkies and don’t park anywhere near there or use fake plates and a vehicle wrap.”

Others, like Arroyo from YCPT, have stoked fears of an imminent civil war instigated by the Democrats. “Keep your powder dry until after the midterms,” one person wrote. “No matter what, they are going to try like hell to provoke a civil war before then.”

“Hold the line till Nov... then do whatever the fuck you gotta do,” another user on patriots.win wrote.

TAGGED: [ELECTIONS](#), [OATH KEEPERS](#), [VIGILANTISM](#), [BREAKING THE VOTE](#), [THE EXTREMISM DESK](#), [DROPBOXES](#), [TRUE THE VOTE](#), [2,000 MULES](#)

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Exhibit J

Why, CPT?: Arizona Oath Keepers as a microcosm for the movement

This piece is an analysis of the YCPT's views, connections, and influence. Much of this piece is based on over fifty hours of footage drawn from 23 YCPT meetings and 9 trainings, 4 "COVID check-ins", and an assortment of interviews or podcasts involving the group's leader, Jim Arroyo.

By [admin < https://militia.watch/author/hstall/>](https://militia.watch/author/hstall/)

June 28, 2021 < <https://militia.watch/read/ycpt-az-ok/>>



• • •

After the storming of the US Capitol Building on 6 January 2021, media has been trying to figure out who the Oath Keepers are. 60 Minutes, 3 months after the riot, [interviewed < https://www.youtube.com/watch?v=32h3Ua4nksg>](https://www.youtube.com/watch?v=32h3Ua4nksg) 4

[minutes-capitol-riots-oath-keepers-militia-video-2021-06-20/](https://www.cbsnews.com/video/60-minutes-capitol-riots-oath-keepers-militia-video-2021-06-20/)> the segment, providing the group more airtime. These Oath Keepers were four members of a Prescott, Arizona area organization known as the Yavapai County Preparedness Team.

Who are the Yavapai County Preparedness Team (YCPT)? The YCPT is an Arizona Oath Keepers chapter, previously directly part of the Stewart Rhodes-led national organization but now autonomous and independent. They still, however, call themselves Oath Keepers and use Oath Keepers iconography and ideology to describe themselves. This article explores their structure, their relationships to the right, and where it looks like they are heading.

This is a very long article, so MilitiaWatch has prepared a first "TL;DR" (too long; didn't read) that hits at some of the core points from this investigation without the goose chases and too-in-the-weeds writing the MW audience might be accustomed to at this point. You can read that here:

TL;DR — Why, CPT?



This post is a summary meant to cover the in-depth work featured in the article here. Summary: The Yavapai County Preparedness Team (YCPT) is a former Oath Keepers affiliate based in Arizona. They are led by Jim Arroyo and his wife, Janet. The husband-wife duo incorporated the YCPT into a state-recognized non-profit in 2019 and ... Continue reading



YCPT Structure

Prior to the split with Rhodes, the Arizona Oath Keepers (as they were once known), partially rebranded as the Yavapai County Preparedness Team (YCPT). There are several reasons for why this happened, which will be covered below. Directly relevant to the structure of the YCPT was a growing disenchantment with an absent national organization. The YCPT's leader expressed this both to journalists and to his organization, saying that the relationship to the national organization was not worth the energy.

This does not mean that the YCPT has never had a relationship with the national organization running Stewart Rhodes' Oath Keepers. The YCPT's lead said during a meeting that the group's name is "Yavapai County Preparedness Team" in part due to a conversation with Rhodes, during which the YCPT lead got Rhodes' blessing to create a separate non-profit organization.

This non-profit entity, created under the Arizona group's name, was in fact incorporated in the state of Arizona as a "Community Service". Federally speaking, this places the YCPT's nonprofit under the "Disaster Preparedness and Relief Service" subcategory as part of the "Public Safety, Disaster Preparedness and Relief" category of organizations. In the articles of incorporation, the YCPT claims to be an organization without members. Below is the leading portion of the YCPT's articles of incorporation in the state of Arizona, detailing this:

Arizona Corporation Commission - RECEIVED: 1-22-2019
Arizona Corporation Commission - FILED: 1-19-2019

9901219CM01

ARTICLES OF INCORPORATION

NON-PROFIT CORPORATION

ENTITY INFORMATION

ENTITY NAME:	Yavapai County Preparedness Team
ENTITY ID:	1942413
ENTITY TYPE:	Domestic Nonprofit Corporation
EFFECTIVE DATE:	01/19/2019
CHARACTER OF BUSINESS:	Community Service
CORPORATION WILL HAVE MEMBERS:	NO
CORPORATION WILL NOT HAVE MEMBERS:	YES

As shown above, the articles to establish this 501(c)3 were filed at the start of 2019. The YCPT's organization brings in less than \$50,000 in annual revenue so its directors are only required to file a Form 990-N each fiscal year. Due to this setup, very little information about the organization, including its on-the-books revenues and spending, is made public. However, there is so far only a record of the group's 2019 filing. This could be due to lags in processing on behalf of the state, given that the organization is still recognized as in good standing with the Arizona Corporation Commission.

The YCPT is led by James 'Jim' Arroyo and his wife Janet, who both reside in Chino Valley, Arizona. Jim was previously the vice president of the Arizona Oath Keepers and is currently the Director, Incorporator, and President of the YCPT. Janet is the Secretary of the YCPT and handles the group's correspondence, note-keeping, and most of their social media.

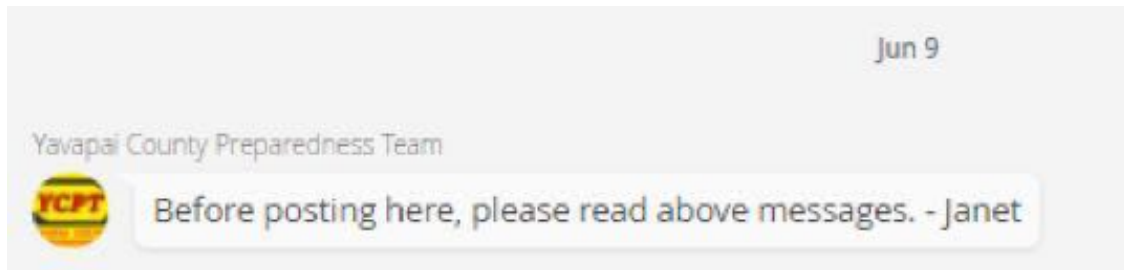


Jim works as a gunsmith at Mazy's, a pro-police gun store located in Chino Valley.

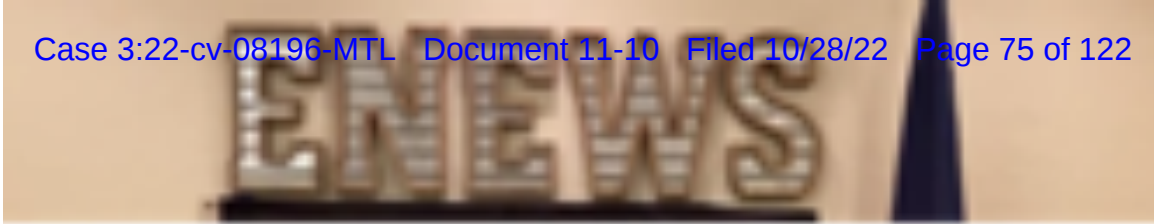
In March 2020, as COVID-19 restrictions began to be put in place throughout the US, Jim detailed on a podcast the "panic buying" happening at his store, describing the sales as "unbelievable", adding that "probably 25-30%" of buyers were first-time gun buyers.

Janet Arroyo, Jim's wife, acts as the group's secretary and takes a backseat when compared to Jim in the YCPT meeting structure. Janet, however, does handle a lot of the group's social media presence. She often signs her engagement on behalf of the YCPT account with her name:

Photo of Jim Arroyo from the Military Phonies site, where they **debunk** < <https://militaryphony.com/2018/12/27/james-arroyo-us-army-ranger-part-of-operation-eagle-claw-blog-of-shame/> > his claimed involvement in Iran hostage rescue op, "Operation Eagle Claw"



The Yavapai County Preparedness Team has created numerous sub-teams within their ranks. One of the more important ones is the Neighborhood Preparedness Groups (NPGs), which operate simultaneously as neighborhood watch and would-be militias. Gary Harworth runs the NPG program. Here is YCPT lead Arroyo and YCPT NPG lead Harworth explaining the NPGs at the Prescott E-News filming desk (more on the E-News later):



Screencap of transmission for Prescott E-News featuring Jim Arroyo and Gary Harworth

Harworth, like Jim, was one of those who appeared in the 60 Minutes piece on the YCPT (originally airing in April 2021, but reairing in June). He notably said during the interview that “when things get a little chaos-y around you, you have to be able to take care of yourself, defend yourself, protect your family [and] those you love—that’s part of the Constitution”, seemingly indicating towards his primary function within the Arizona Oath Keepers milieu and what drives him: self-defense and the notion of protecting one’s loved ones.

• • •

On the NPGs

Gary Harworth’s Neighborhood Preparedness Groups (NPGs) have a lot of related text and video on the group’s website, including this amazing intro page, perhaps hinting at their target client:

One of the most important functions of the NPGs, according to meeting footage recorded by the YCPT, is to react and response to BLM and 'Antifa' in NPG-controlled areas. This involves linked communications channels that are connected to a Quick Reaction Force (QRF) that is ready to show up armed to stand off against these perceived adversaries. This should sound fairly familiar to those who have been tracking both Oath Keepers movements specifically or militia units more broadly – the NPG in a lot of ways takes on the specific roles of a militia unit that the YCPT claims to have moved beyond.

Within this reaction paradigm, YCPT NPG members are expected to gather 'intel' on the situation to which they seek to respond. Jim lays out in a video but also in YCPT NPG handouts a system for documenting the highest quality data on the 'units' they are tracking. Below is the "SALUTE Report" format:

SALUTE Report

S.) Size – Number of troops, vehicles, aircraft

A.) Activity – “What are they doing?” Direction of travel.

L.) Location – Grid coordinates, mile markers, cross streets, landmarks.

U.) Unit / Uniform – Describe best as possible.

T.) Time and Date – Absolutely vital!

E.) Equipment – Accessories on aircraft, weapons, what is being towed by vehicles, etc.

ATTACH PHOTOS IF POSSIBLE

Sent to: Name _____
email _____
Phone _____

YCPT SALUTE Report form, acquired from YCPT internal files

Right off the bat, the reader will note that the ‘S’ in SALUTE stands for size, which is specified as “number of **troops**“, pointing to the perception of adversaries as military gatherings. That “aircraft” are also listed in this element of the reconnaissance report speaks to potentially broader targets, e.g. modern military units, as well. This is then repeated once more under ‘E’ for equipment.

The NPGs, as described above and elsewhere on the YCPT online ecosystem, also seek to build out a robust ‘intel’ infrastructure. This set-up is partially based

1. Gaining subject matter expertise
2. Removing bias from our thinking
3. Arriving at accurate conclusions

It’s unclear how rigorously either of these are followed within NPG units, but the overall YCPT structure speaks to major failures to adhere to these baselines. Take, for example, this 15 October post by the YCPT mods, which shares a pdf of the “Antifa Manual”:



When asked about the manual’s source, the moderator replies that “A member said they found it left behind”, though the YCPT has yet to have engaged with antifascists in the street and the file is a series of screenshots of a supposed manual “Dropped in Eugene on May 29, 2020 during a Riot.”, first page reproduced below:



The ‘manual’ is an obvious hoax, and a **[simple web search < https://www.google.com/search?q=the+antifa+manual>](https://www.google.com/search?q=the+antifa+manual)** of “the antifa manual” turns up as a first result a **[page < https://www.adl.org/disinformation-antifa-manual>](https://www.adl.org/disinformation-antifa-manual)** from the Anti-Defamation League (ADL) titled “Disinformation: Antifa manual”. This page by the ADL links to 2017 Snopes **[debunking < https://www.snopes.com/fact-check/antifa-manual-online/>](https://www.snopes.com/fact-check/antifa-manual-online/)** of the false document and pointing to the first poster of the document as an August 2017 Imgur upload by a literal Nazi. The ADL also specifically discusses the iteration of the document that includes the Eugene riot leading line as a widely circulated disinformation document during the summer of 2020. The **[riot <](#)**

Uncovering the non-validity of this document took MW less than 15 seconds to search on Google, without using any fancy OSINT tricks. If the YCPT mods are unable to do this, how can they claim that NPGs follow an intelligence doctrine that isn't equally as flawed, biased, and inaccurate?

The NPGs fit into a larger prepping hierarchy, which moves from most discrete to most broad in this order:

- Individual preparedness
- Family preparedness
- NPGs
- Community Preparedness Teams (CPT)

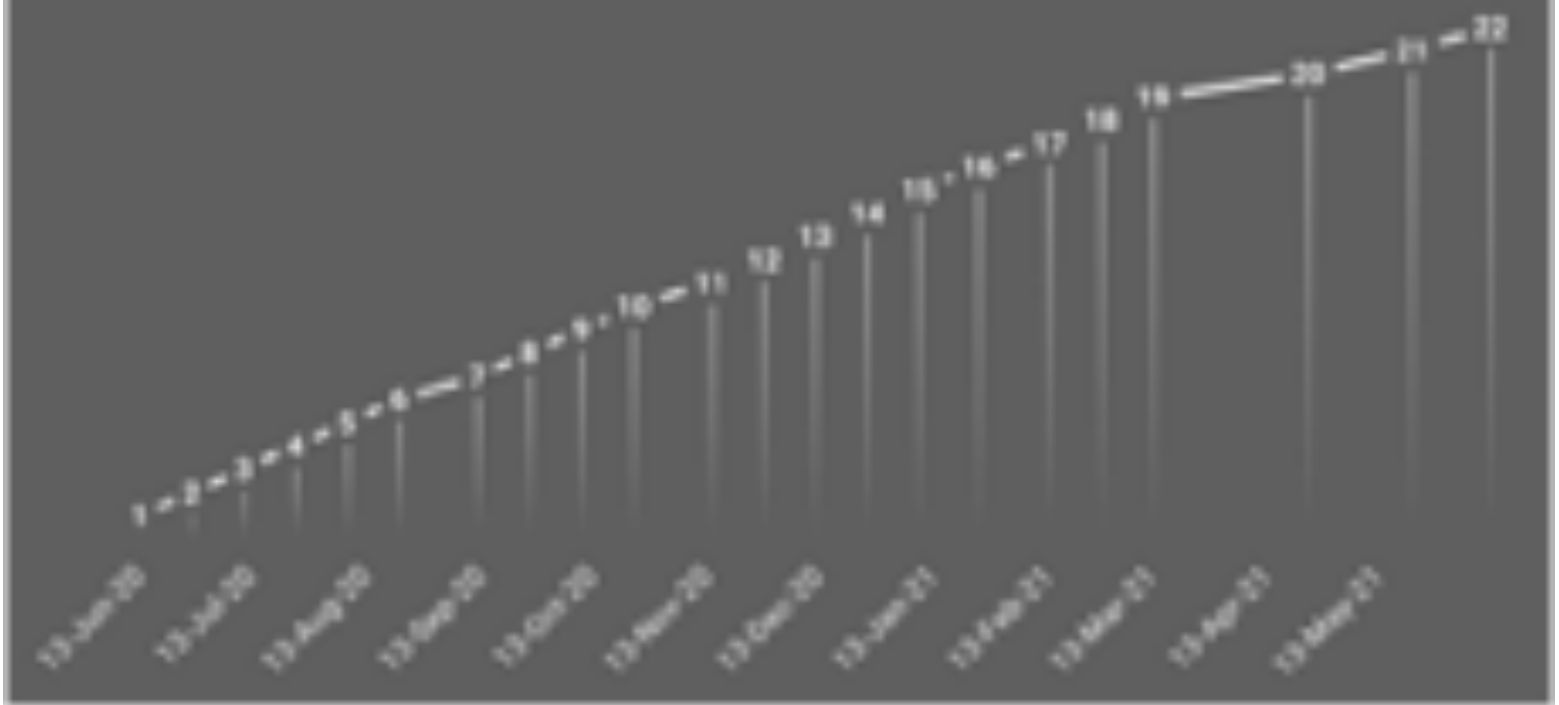
All of these levels include staples of prepper lists, everything from water to comms channels to weapons (described on their sites as “Firearms for every adult, capable teenaged children” and “One rifle, one pistol, in common calibers only. Preferably on AR platform for magazine interchangeability. Pistols are a personal choice”). Other equipment for these teams include such items as “palm pilots”, “night vision”, “tactical clothing”, and “good socks”.

The Community Preparedness Teams (CPT) is the superstructure by which the YCPT operates, which is something they are now pushing at a greater scale. This will be covered more in-depth later, but first, some notes on the group's events schedule.

Schedule

The YCPT keeps a fairly regular schedule, usually meeting every other Saturday for a two- to four-hour-long meeting led by Jim Arroyo in Prescott, Arizona. These meetings cover a range of topics (many of them well-tread by now) and are all recorded by the YCPT team, who then upload the recordings on their media channels.

To show how regular these meetings usually are, here is a graph of each of the 22 meetings the YCPT has posted online, alongside the meeting's date:



The chart of these meeting dates is fairly evenly spread, with only a few jolts in the YCPT's biweekly schedule. It appears that despite many people opting to avoid group meetings during the summer and fall of 2020 due to the virus's spread, the YCPT actually launched their recorded group meetings at that time.

*Note: there is *technically* a 26 October 2019 YCPT meeting that was recorded and uploaded to YCPT media channels, but it is a major outlier on the graph.*

These meetings cover a range of topics, but mostly repeat a lot of the same material. Looking at the content of these 22 meetings, 100% of the meetings discuss guns or firearms explicitly. All but one meeting discuss the topics of 'Antifa', Donald Trump, and civil war. Civil war seems to be a constant feature of these meetings, and the one meeting not to discuss civil war was the group's meeting right after the 2020 election, which did discuss civil unrest and violence though not civil war specifically. Democrats and Black Lives Matter were discussed by Jim Arroyo and his friends 90.0% and 86.4% of the time, respectively. Cumulative discussion of these topics are charted below, with lapses in mention portrayed as 0 on the y-axis to show gaps.

YCPT MENTIONS OF KEYWORDS

Cumulative number of videos mentioning the keywords “BLM”, “Antifa”, “Democrats”, “Trump”, “Guns/Firearms”, and “Civil War”, with no mention marked as 0 to show meetings not discussing them.

These meetings are occasionally also supplemented with additional training material or vlogs from Jim. The training material comes in the form of a lecture to a camera, covering topics such as home remedies, survival foods, or “neighborhood security”. These lectures usually are recorded and posted on off weekends, allowing for more YCPT content to be consumed on a near-weekly basis. The vlogs have mostly been in the form of a COVID-19 “check in” while Jim sips coffee from a YCPT-branded mug, usually 15-30 minutes.

During these vlogs, Jim provides his viewers with such insights as referring to the mid-April COVID-19 numbers as “wrong”, adding that “we are in the midst of a propaganda campaign the likes of which we’ve never seen”.

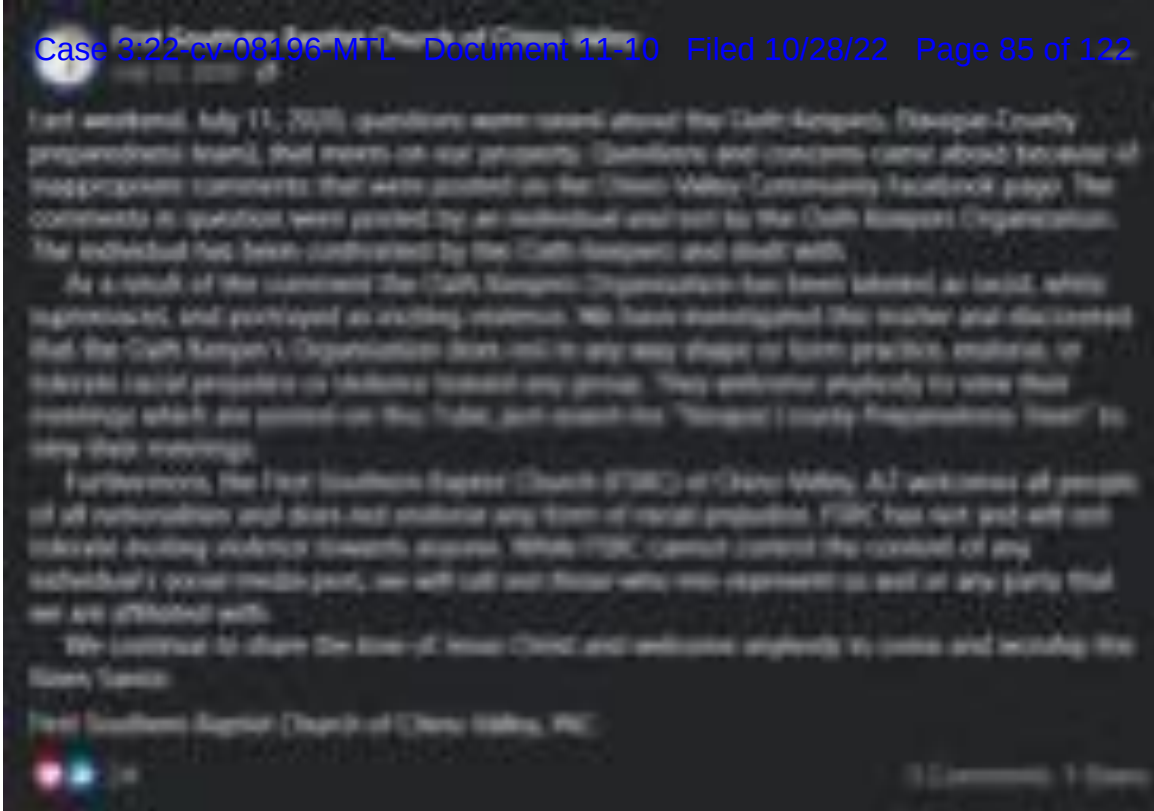
The content of these vlogs varies between political theorizing, claims against public health departments, and assorted prepper tips. In a May 2020 video, Jim discusses details on bleach for several minutes, interjecting advice on how to encourage friends and family to get into prepping between providing his views on the cleaning product.

Many of these vlogs are posted on YCPT media but recently have also found a home in the Prescott E-News media channels, citing Jim Arroyo as the writer/creator.



The group primarily meets at First Southern Baptist Church of Chino Valley. Here's how that was determined.

First, there's this post from the First Southern Baptist Church of Chino Valley (FSBCCV), which discusses an Oath Keepers member who made "inappropriate comments" in a Chino Valley community group. In the post, the FSBCCV details that the Yavapai Country Preparedness Team "meets on our property" in this 22 July 2020 post:



A Facebook post concerning the YCPT using their space ([live link < https://www.facebook.com/FSBCCV/posts/3330303420354521>](https://www.facebook.com/FSBCCV/posts/3330303420354521))

This location is corroborated as the core YCPT meeting place by a few other clues from the YCPT chatter Mewe. First, four months ago, the YCPT account posted that attendees could park at a Safeway and then drive to the church in one car:



There is, in fact, a Safeway just down the street from the First Southern Baptist Church (FSBC), accounting for about a 4 minute drive parking lot to parking lot:



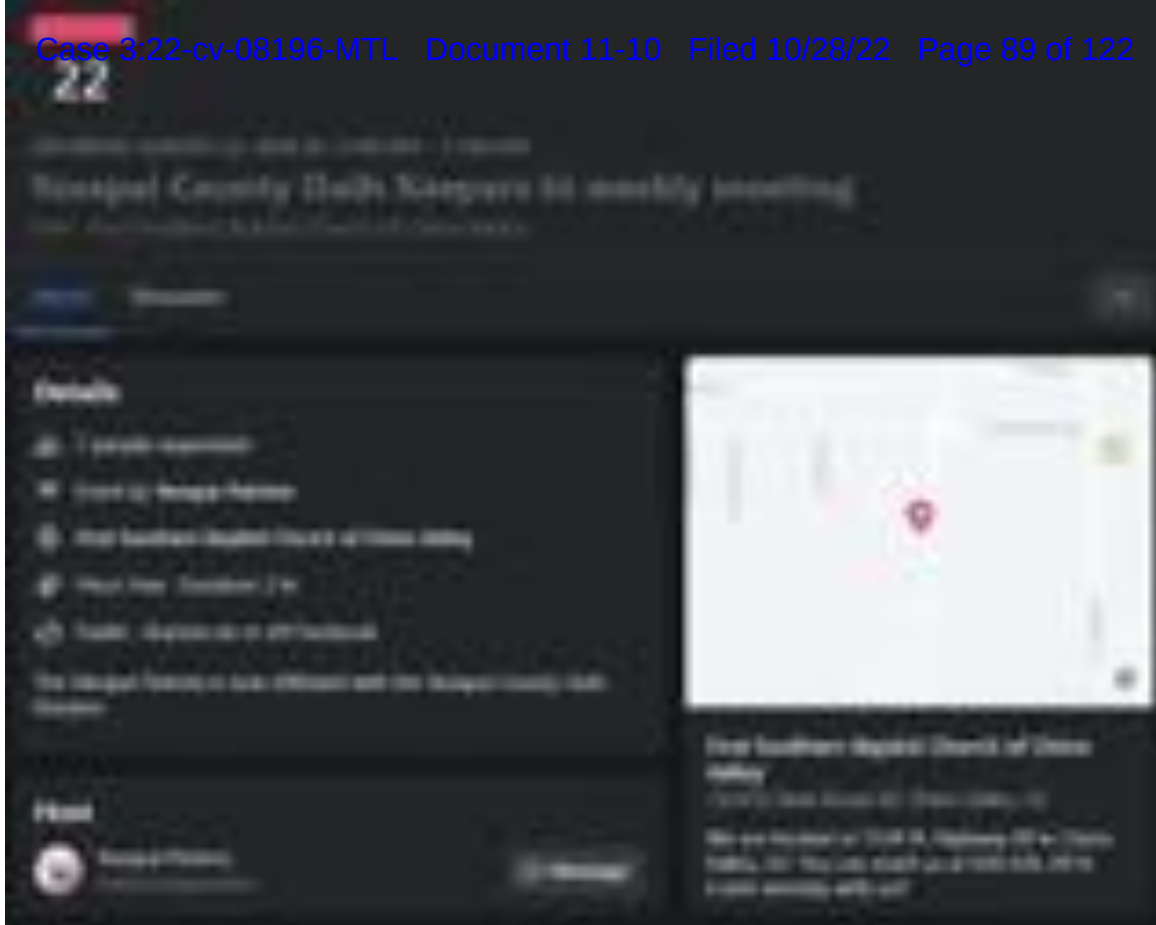
A month later, another post includes the address of the church as the meeting location, down to the specific building (“C”):



But more recently, here is a post for a *scheduled* training class on 21 June 2021 just before this article’s publication. The event lists the “First Southern Baptist Church in Chino Valley” as “where the OK/YCPT Meetings are held”:



Another late summer 2020 Facebook event for a “Yavapai County Oath Keepers bi weekly meeting” included the FSBCCV as a meeting location, hosted by an organization known as the “Yavapai Patriots”.



Old Facebook event, hosted by the Yavapai Patriots ([live link < https://www.facebook.com/events/first-southern-baptist-church-of-chino-valley/yavapai-county-oath-keepers-bi-weekly-meeting/1658559864306187/>](https://www.facebook.com/events/first-southern-baptist-church-of-chino-valley/yavapai-county-oath-keepers-bi-weekly-meeting/1658559864306187/))

The Yavapai Patriots are another important recent development to be discussed further below, too.

Oath Keepers relationship

The YCPT formed directly out of the national organization run by Oath Keepers founder Stewart Rhodes. In 2015, the YCPT even got a pat on the back from the national organization, who reposted a positive news article about Jim's organization on their site:



However, a recent fixture of YCPT media presence has been their continuing claim that they are no longer affiliated with the national Oath Keepers organization. Arroyo puts a timeline to this, saying in a recent meeting that he hasn't talked with Rhodes in "over two years". But it wasn't always this way, as Jim has discussed even in the last year and six months the process by which the YCPT's non-profit was created. Specifically, he summarizes a conversation that he and Rhodes allegedly had about forming the YCPT so that the group could apply for funding via grants federal and otherwise. The YCPT was incorporated in 2019 so Jim's "two years" statement is at least close to that timeline.

Though the YCPT may have broken up with Rhodes, they clearly haven't broken up with the idea of the Oath Keepers. Jim still wears OK gear, the group still maintains that they adhere to the 10 "Orders We Will Not Obey" outlined by Rhodes in 2009, and they still refer to their movement colloquially as Oath Keepers. They do this while simultaneously and fervently saying that the Oath Keepers are not a militia. This is in direct contradiction to the Oath Keepers founder's opinion of the movement, which both he and national Oath Keeper writers have defined as a "militia" in begging President Donald Trump to deputize the national organization for violence.

Ultimately, the definition of "militia" isn't as important as the notion that the Oath Keepers nationally and the YCPT's NPGs specifically, see themselves as armed arbiters of peace in direct opposition to movements to their left (from BLM to 'antifa' to the Democratic Party).

Connections to the GOP state apparatus

The Yavapai County Preparedness Team is quite well connected to their geographically-specific GOP state apparatus. At minimum in August 2020, November 2021, and March 2021, Arizona State Representative Quang Nguyen spoke at meetings for the organization. Nguyen said *just ahead of the contentious 2020 election* that not only was the Democratic Party the “Communist Party of America”, but that “the only good commie is a dead commie”, to thunderous applause. Quong is also the head of the Arizona State Rifle and Pistol Association and has used YCPT appearances to push for membership of the organization. Quong also identified himself in the March 2021 meeting that he “might be the only Oath Keeper down [in the Arizona Legislature]” alongside Wendy Rogers, for which he clarified “Yes. So one in the Senate, one in the House. And I’m not exactly real shy about it either.”

Wendy Rogers, an Arizona State Senator, has also boasted about her appearances at YCPT events, calling herself a member of the Oath Keepers on her Twitter page after attending an Arizona Oath Keepers meeting in Cottonwood. YCPT lead Jim Arroyo has also referred to Arizona State Representative Judy Burges as an ally of his movement, too.



Wendy Rogers speaking to a YCPT meeting, via her [Twitter < https://twitter.com/WendyRogersAZ/status/1368398965113257989 >](https://twitter.com/WendyRogersAZ/status/1368398965113257989)

YCPT meetings have been frequent campaign stops for would-be elected officials. In June 2020, US Senate candidate Daniel McCarthy described the current political moment of the day as “a literal war”, saying that “the United States is actually in the middle of a war right now... and that’s why you’re here.” Despite being a member of the Council for National Policy, McCarthy (a highly-moneyed conservative network which Anne Nelson [describes < https://www.bloomsbury.com/us/shadow-network-9781635573190/>](#) as a “pluto-theocracy”) lost the Republican primary 3:1 to Martha McSally, who in turn lost to Democrat Mark Kelly.

Selina Bliss, a GOP candidate for Arizona State Representative, spoke at a June 2020 YCPT meeting before she lost a primary to Quang Nguyen and Judy Burges, both of whom went on to win against the Democratic candidate, Judy Stahl, for the two open seats as part of the 2020 election.

GOP candidate Harry Oberg, now an elected member of the Yavapai County Board of Supervisors, attended a July 2020 meeting of the YCPT, too. He spoke just after Jim described “your House of Representatives [and] your US Senate” as the group’s “domestic enemies”.



July 2020 photo of Gosar posing with a man in a Proud Boys shirt while another man in an Oath Keepers stands nearby, in Prescott Square.

[Photo via Vaughn Hillyard < https://twitter.com/VaughnHillyard/status/1279484319312953344>](https://twitter.com/VaughnHillyard/status/1279484319312953344) .

One of the three current members of the Arizona Corporation Commission, Jim O’Connor, also spoke at the June 2020 YCPT event that Selina Bliss spoke at.

YCPT lead Jim Arroyo has also claimed that US Representative Paul Gosar, who is representing Arizona, has met with the group, telling them that they are “in [a civil war], we just haven’t started shooting yet”. Gosar attended a 4 July 2020 event in Prescott, Arizona, where he took photos with men in Proud Boys shirts while a man in an Oath Keeper shirt looked on (see photo at left, via Vaughn Hillyard).

Paul Gosar is a far-right politician with connections to White Nationalists. He skipped a vote in the House to attend and [speak <](#)

<https://www.huffpost.com/entry/paul-gosar-white-nationalist->

[chanted his name < https://www.azmirror.com/2021/03/01/paul-gosar-spoke-to-a-white-nationalist-conference-and-they-chanted-his-name/>](https://www.azmirror.com/2021/03/01/paul-gosar-spoke-to-a-white-nationalist-conference-and-they-chanted-his-name/) in support. He's also one of the members of the far-right "America First Caucus" that just released a [policy < https://www.fastcompany.com/90626471/should-the-america-first-caucus-sound-an-alarm-about-white-nationalism>](https://www.fastcompany.com/90626471/should-the-america-first-caucus-sound-an-alarm-about-white-nationalism) platform in mid-April 2021. This caucus [claims < https://www.cbsnews.com/news/america-first-caucus-would-champion-anglo-saxon-political-traditions/>](https://www.cbsnews.com/news/america-first-caucus-would-champion-anglo-saxon-political-traditions/) to [push < https://www.cnn.com/2021/04/16/politics/marjorie-taylor-greene-america-first-caucus/index.html>](https://www.cnn.com/2021/04/16/politics/marjorie-taylor-greene-america-first-caucus/index.html) 'a uniquely Anglo-Saxon political tradition', a very thin dogwhistle even [rejected < https://www.forbes.com/sites/andrewsolender/2021/04/17/america-first-caucus-rejected-even-by-right-wing-freedom-caucus/?sh=2ddc7ae336a8>](https://www.forbes.com/sites/andrewsolender/2021/04/17/america-first-caucus-rejected-even-by-right-wing-freedom-caucus/?sh=2ddc7ae336a8) by some other right-wing caucuses like the 'Freedom Caucus'. The platform was so controversial, that three days after its release, the AFC's frontwoman, Marjorie Taylor Greene, said she was [suspending < https://www.forbes.com/sites/andrewsolender/2021/04/17/marjorie-taylor-greene-calls-off-america-first-caucus-following-backlash/?sh=135d2a164198>](https://www.forbes.com/sites/andrewsolender/2021/04/17/marjorie-taylor-greene-calls-off-america-first-caucus-following-backlash/?sh=135d2a164198) the caucus. As Trump was waffling over "many fine people" on "both sides", Representative Paul Gosar [continued < https://www.washingtonpost.com/news/morning-mix/wp/2017/10/06/arizona-congressman-repeats-bogus-claim-that-charlottesville-violence-was-left-wing-plot/>](https://www.washingtonpost.com/news/morning-mix/wp/2017/10/06/arizona-congressman-repeats-bogus-claim-that-charlottesville-violence-was-left-wing-plot/) to repeat the obviously [false < https://www.azcentral.com/story/news/politics/arizona/2017/10/05/arizona-rep-paul-gosar-pushes-far-right-conspiracies-charlottesville-george-soros/737205001/>](https://www.azcentral.com/story/news/politics/arizona/2017/10/05/arizona-rep-paul-gosar-pushes-far-right-conspiracies-charlottesville-george-soros/737205001/) claim [claim < https://www.businessinsider.com/paul-gosar-charlottesville-riots-george-soros-conspiracy-2017-10>](https://www.businessinsider.com/paul-gosar-charlottesville-riots-george-soros-conspiracy-2017-10) that 2017's Unite the Right in Charlottesville VA, which led to the murder of Heather Heyer, was a 'left-wing plot'. Gosar repeated similar dubious [claims < https://www.businessinsider.com/paul-gosar-charlottesville-riots-george-soros-conspiracy-2017-10>](https://www.businessinsider.com/paul-gosar-charlottesville-riots-george-soros-conspiracy-2017-10) after the storming of the US Capitol Building on J6.

The Prescott E-News blog, which is unabashed in its admiration for the Oath Keepers in general and the YCPT specifically, has also detailed a lot of these relationships, [writing < https://prescottnews.com/index.php/2020/10/04/oath-keepers/>](https://prescottnews.com/index.php/2020/10/04/oath-keepers/) just ahead of the 2020 election the following:

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“SINCE 2016, I HAVE ATTENDED A NUMBER OF OATH KEEPER MEETINGS IN CHINO VALLEY AND BEEN INVITED TO SPEAK DURING POLITICAL CAMPAIGNS. TO MY KNOWLEDGE, MANY OTHER LOCAL OFFICIALS AND CANDIDATES INCLUDING REP. NOEL CAMPBELL, SHERIFF SCOTT MASCHER, SHERIFF-ELECT DAVID RHODES, COUNTY ATTORNEY SHEILA POLK, COUNTY SUPERVISOR CRAIG BROWN AND REPRESENTATIVE-ELECT JUDY BURGESS HAVE ALL SPOKEN AND BEEN WARMLY RECEIVED AT OATH KEEPER MEETINGS. REPRESENTATIVE-ELECT QUANG NGUYEN, A VIETNAMESE REFUGEE, RECENTLY SPOKE TO A STANDING ROOM ONLY CROWD ABOUT HIS LIFE UNDER COMMUNISM AND HIS SUPPORT FOR THE SECOND AMENDMENT.”

The previous statement is written by David Stringer, the owner and publisher of the Prescott E-News, who describes his media organization’s role in engaging with the YCPT as part of the Prescott E-News’ stance that they are “committed to providing a platform for [the YCPT’s] vital public service.”

David Stringer is a disgraced public official who was pushed to **resign** < <https://www.azcentral.com/story/news/politics/arizona/2018/12/12/david-stringer-controversy-why-did-arizonans-prescott-voters-elect-him/2230605002/>> from the Prescott City Council over racist comments in 2018. Stringer was **recorded** < <https://www.azcentral.com/story/news/politics/arizona/2018/11/30/arizona-rep-david-stringer-facing-calls-step-down-said-african-americans-dont-blend/2166952002/>> in November 2018 expanding on his views on “multiculturalism”, saying that there aren’t “enough white kids to go around” in Arizona’s public schools, saying non-white Americans do not “blend in” after coming to the US, and calling immigration an “existential threat”.

Allegations related to this episode have featured highly on the Prescott E-News platform Stringer manages, including in an **interview** < <https://www.facebook.com/eNewsAZ/videos/467105077495417>> he hosted of himself with Prescott E-News staffer Glenn Martin. Behind the two, chatting at a table in July 2020, a “Stringer for County Attorney” sign sits below an “ENEWS” sign.

David Stringer chats with Glenn Martin for an internal interview in the Prescott E-News blog, allowing Stringer to use his journalistic platform to campaign

Technically, the Prescott E-News is not registered as an incorporated body in the state of Arizona. However, at the street address that the Prescott E-News team works (115 E Goodwin Street), there is a media company named “Specialized Publishing LLC” run by David Stringer that appears to be the body that controls the Prescott E-News. This Specialized Publishing LLC was founded in 2016 by Lynne LaMaster, who now runs CopperState news. Lynne lists on her LinkedIn that she was the owner and founder of “Prescott eNews” from June 2000 through May 2020. On the Arizona Corporation Commission’s site, the “Specialized Publishing LLC” previously owned and operated by LaMaster changed hands in April 2020, to be operated by Stringer at the 115 East Goodwin Street location:



The above filming location, used for most if not all Prescott E-News interviews and webcasts filmed inside, is the same location that Arroyo and Harworth discussed the YCPT's NPG units. This is the same location that a multitude of Jim's webcasts were recorded from for YCPT media channels (which have since been removed by the group from major platforms, but are all on Prescott eNews channels). Here's one, featuring the same "ENEWS" sign and Arizona flag and an "OATH KEEPERS" flag in place of a campaign sign:

One such video series recorded at the Prescott E-News webcast table is a November 2020 take from Jim Arroyo on “The Coming Civil War”, a 1-hour-long discussion in two parts that was also removed from YCPT media channels.

Glenn Martin, the host with the Prescott E-News who interviewed David Stringer and has interviewed Jim and Janet Arroyo several times, is also a member of the YCPT’s Mewe group and actively posts as though he is not solely an observer but an outright member of the organization. Here he is around Christmas addressing the group as “Patriots”:



Glenn is a fairly constant poster in the YCPT’s Mewe group, posting 18 times to the group’s wall and in the chat within the day of writing this post, during which he shared a screenshot of a post by the aforementioned far-right AZ representative Quang Nguyen, adding, “This is his freshman term... wait till his next term.... He’s just warming up. Conservative Republican and Oath Keeper.....”.

Paul Gosar, the right-wing GOP politician linked to white nationalist organizing and an originator of Arizona’s seemingly never-ending Stop the Steal endeavor, has also had his content reposted on the Prescott E-News site ([archive < https://web.archive.org/web/20210120200650/https://prescottnews.co](https://web.archive.org/web/20210120200650/https://prescottnews.co)

<https://www.facebook.com/eNewsAZ/posts/3987504357953048>>).

The YCPT site and media pages also give more insight into the group's connections. The YCPT site has numerous pictures in a slideshow. Among these is a photo taken including Mike Rice (the group's sole visible Black member) and Allen West, a high-profile Black Tea Party representative from Florida.



Allen West and Mike Rice ([archive <](#)
<https://web.archive.org/web/20210617213912/https://ycpt.org/wp-content/uploads/2021/02/Mike-Rice.jpg>>.)

The above photo is likely at a campaign event but is presented as promotional material for the YCPT. Rice is wearing an Oath Keepers shirt and a United States Concealed Carry Association (USCCA) morale patch on his hat, theater seating visible behind the two.

Other right-wing figures, such as Dave Hodges of “The Common Sense Show”, which spends a lot of time posting on caps lock about “CHICOMS” and “WW III”.



Dave Hodges and Jim Arroyo ([archive < https://web.archive.org/web/20210428211832/https://ycpt.org/wp-content/uploads/2021/01/Dave-Hodges-Jim.jpg >](https://web.archive.org/web/20210428211832/https://ycpt.org/wp-content/uploads/2021/01/Dave-Hodges-Jim.jpg))

In 2016, The YCPT also was apparently engaged in polling place observation, according to Jim Arroyo. They did this in Arizona at the same time as Roger Stone’s “Stop the Steal” efforts of that election were underway in the state. Arroyo **[told < https://kjzz.org/content/390334/questions-build-over-line-between-fraud-prevention-voter-intimidation-polls-arizona >](https://kjzz.org/content/390334/questions-build-over-line-between-fraud-prevention-voter-intimidation-polls-arizona)** journalists he and other Oath Keepers were there as part of “a surveillance operation”.

• • •

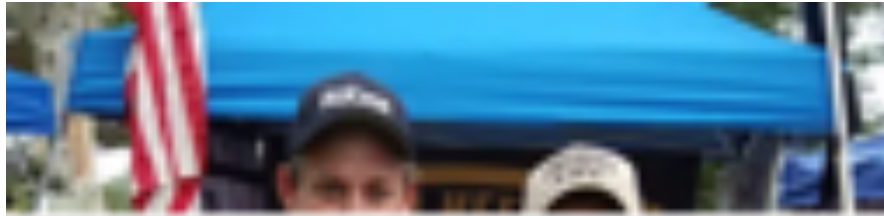
Connections to police

In the **[60 Minutes interview < https://www.youtube.com/watch?v=32h3Ua4nksg >](https://www.youtube.com/watch?v=32h3Ua4nksg)** of Jim Arroyo, Jim stated that active law enforcement are part of their group. He said this to push the group’s professionalism and knowledge. It’s a bit unclear about which officers are, but the group’s connections to law enforcement are easily detectable.

Among the YCPT meetings of 2020, at least one former NRA volunteer law enforcement instructor took the microphone to talk to the chapter. This man, first name Frank, claimed to have formerly provided instruction to the Maricopa

County and Yavapai County Sherriffs' offices. He came to the meeting to share his disdain for BLM co-founder Patrisse Cullors at a July 2020 meeting, mostly because of her faculty position at Prescott College, in the YCPT's own backyard. The Oath Keepers claim to be fighting against "neo-Marxists", so much of Frank's critique of Cullors is related to her interviews in which she identifies herself as a scholar of Marx.

The YCPT photo slideshow also features Jim Arroyo standing in front of an Oath Keepers tent next to an unnamed police officer wearing a shirt emblazoned with "Chief of Police" on it.



Man in "Police Chief" shirt with Jim Arroyo in front of an Oath Keepers tent ([archive < https://web.archive.org/web/20210617214440/https://ycpt.org/wp-content/uploads/2021/02/Tent.jpg >](https://web.archive.org/web/20210617214440/https://ycpt.org/wp-content/uploads/2021/02/Tent.jpg))

First up is confirming that this casualwear is part of a police department's uniform. Thankfully, a quick search for Chino Valley police results in an [article < https://www.dcourier.com/news/2016/aug/03/meet-your-neighbor-cvdp-debuts-new-patch-national- />](https://www.dcourier.com/news/2016/aug/03/meet-your-neighbor-cvdp-debuts-new-patch-national/) with the following photo, wherein the man on the left wears the same shirt as the man in the photo above, sans the "Chief of Police" stitching:



Two Chino Valley Police Department employees, showing two modes of CVPD dress. At left, a casual polo. At right, a formal uniform.

These two men are featured in an article about announcing a new police patch at a “National Night Out”, a pro-police community festival held in many locations in the US. The Chino Valley website has a [webpage <http://www.chinoaz.net/362/National-Night-Out>](http://www.chinoaz.net/362/National-Night-Out) devoted to this exact event, describing its goals:



Chino Valley AZ city website describing the “National Night Out” event in their city

In the screenshot above, the CVPD's chief is listed as "Charles Wynn", who had a 2015 profile in the Daily Courier, the same outlet as published the story on the department's new "modern" looking patch. In his profile, he is seated at a desk and named as "Chuck Wynn":



Chino Valley Police Department Chief Chuck Wynn, featured in a local paper

The National Night Out appears to be a pretty big deal in Chino Valley, and has become a yearly tradition known for the seasonal pro-cop party. In a recap **video** < <https://www.facebook.com/watch/?v=1273747172662209> > with an assortment of strange skits about the musical acts for the 2016 Night Out, Chief Wynn is visible, wearing his casual shirt and a confused look:

National Night Out 2018



The Chino Valley Police Department also has sold patches and hats at Mazy's, the gun store where YCPT leader Jim Arroyo works as a gunsmith:



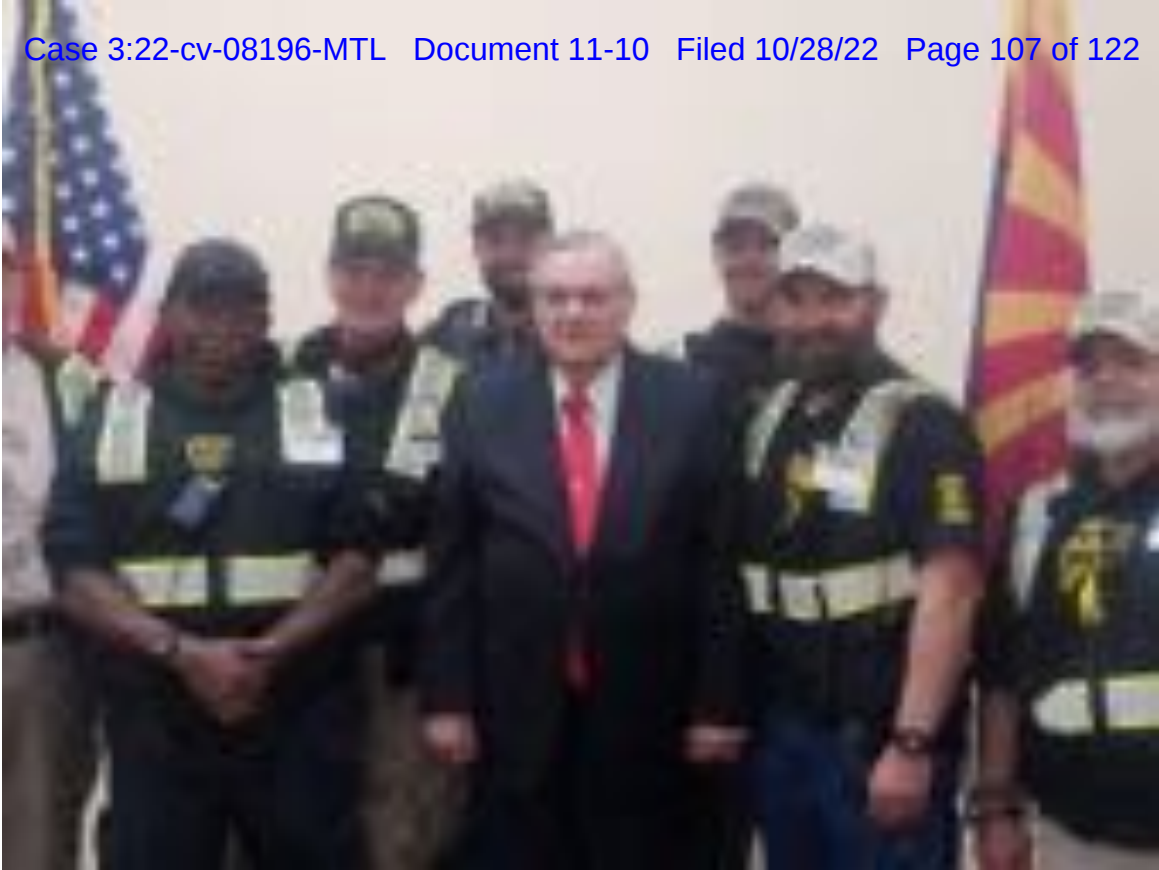
Post on the Chino Valley Police Department's Facebook ([link < https://www.facebook.com/permalink.php?story_fbid=2514038325299748&id=656334361070163>](https://www.facebook.com/permalink.php?story_fbid=2514038325299748&id=656334361070163))

Prescott E-News indicated that they attended a YCPT meeting with Sheriff Scott Mascher in attendance. The YCPT's slideshow also has a photo of Mr. Mascher from before he retired:



Scott Mascher's photo, as it appears on the YCPT's site ([archive < https://web.archive.org/web/20210428211554/https://ycpt.org/wp-content/uploads/2021/01/SHERIFF-SCOTT-MASCHER.jpg >](https://web.archive.org/web/20210428211554/https://ycpt.org/wp-content/uploads/2021/01/SHERIFF-SCOTT-MASCHER.jpg))

The same is the case for far-right Sheriff Joe Arpaio, who took a glamor shot with multiple YCPT members, including Mike Rice and Jim Arroyo, here:



Joe Arpaio visits the YCPT for a photo op ([archive < https://web.archive.org/web/20210428211548/https://ycpt.org/wp-content/uploads/2021/03/OK-Security-w-Sheriff-Arpaio.jpg>](https://web.archive.org/web/20210428211548/https://ycpt.org/wp-content/uploads/2021/03/OK-Security-w-Sheriff-Arpaio.jpg))

Joe Arpaio was notably given a **presidential pardon** < <https://www.theguardian.com/us-news/2017/aug/23/joe-arpai-donald-trump-signals-presidential-pardon-for-controversial-sheriff>> by Donald Trump regarding Arpaio's **charges** < <https://www.nytimes.com/2017/07/31/us/sheriff-joe-arpai-convicted-arizona.html>> related to his commitment to continue racial profiling against suspected Latino immigrants in Arizona.

The connections and comraderie with police isn't something of the past, either, as the YCPT plans to hang out with police for a fundraiser a few days after this post was written:

SUPPORT OUR LOCAL POLICE DEPARTMENT!

Corn Hole Tossing - Sunday, June 27 @

The Chino Valley Police Foundation is holding a Corn Hole Tournament at 2 pm on Sunday, June 27 at Memory Park in Chino Valley.

Entry fee is \$25.00 per two-person team.

Please contact Sofia at [REDACTED] to enter your team.

This sounds like a great way for friends and family to enjoy a Sunday afternoon, and to show our law enforcement we support and appreciate them!

< Back + More

YCPT Tangoes: 'Antifa' and 'BLM'

Jim Arroyo, like most Oath Keepers and indeed those in his own unit, are extremely concerned about the specter haunting Chino Valley, Arizona: leftist shenanigans. 95.5% of all videos viewed by MilitiaWatch as part of this investigation mentioned 'Antifa' and 86.4% mentioned 'BLM'. Both of which are often mentioned together and interchangeably. In a discussion about "Neighborhood Watch" programs, these actors serve as a boogeyman for which the Oath Keepers are to respond with force of arms. Those patrolling the street on behalf of the YCPT are to send a warning via walkie-talkie to a central 'command', which then sends out a 'Quick Reaction Force' (or 'QRF') to dissuade their adversaries.

In a May 2021 community meeting, the YCPT leader detailed the actions of Black Hammer, specifically a cadre of the group that had bought land in Colorado. Jim Arroyo said that the group — which he and other meeting attendees ridiculed over being feckless and ineffective — was evidence that communists had also taken over the United States. Shortly thereafter, Jim added that the "U.S. military has been heavily penetrated by the Communist Party — witchcraft, all kinds of crazy religions". The 'threat environment' of the YCPT, like with the Oath Keepers they claim to have distanced themselves from and the militia movement they claim not to be a part of, is exceedingly broad, convoluted, and ever-growing. These types of discussions — melding discussions about adversaries with complaints about the current state of affairs in the US — are a staple of YCPT meetings.

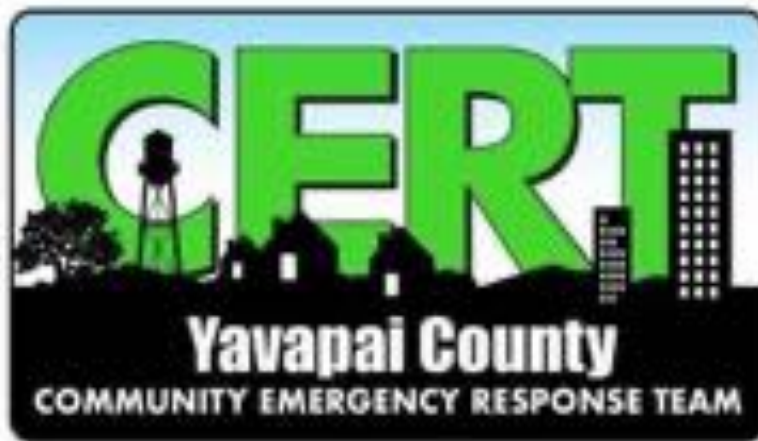
There is not yet any evidence that YCPT has ever interacted with BLM, Antifa, or other leftists. Nor is there yet documentation that they have activated the NPGs to respond to rumors about their adversaries.

Funding

As mentioned above, the YCPT incorporated as a non-profit to seek donations for disaster relief. While they have reported some individual donations, it does not yet appear that they have been successful in earning a major grant, private or federal or otherwise. As early as March 2020, Jim was saying they had the 501c3 specifically to apply for funding and grants, a line he has repeated during many meetings.

One of the things that seems to indicate a posture towards a possible channel for funding is the YCPT's alignment with CERT programs, the "Community Emergency Response Team" federal program that seeks to teach preparedness to communities before disaster response is needed. They have CERT logos alongside "Stop the Bleed" logos on their physical and web banners.

There is a Yavapai County CERT organization that is active in Prescott Valley:

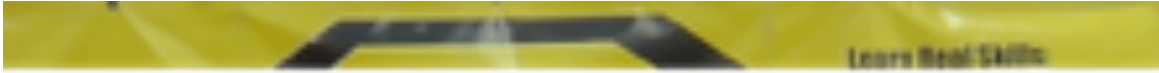


And the Yavapai County CERT group has hosted Jim and his big YCPT banner at least once in May 2019:

The Yavapai County CERT has also advertised a Three Percenters Original first aid training in the summer of 2019, too:



In addition to establishing the YCPT as a non-profit for donations and grant funding, Jim has used YCPT meeting time to advertise the group's coffee, known as "YCPT BREW", with its own corresponding line of YCPT-branded mugs. In transmissions, Jim refers to his coffee guy as "Jason", pointing him out to the crowd from his table at the front of the room.



Jim holding a bag of YCPT Brew at a YCPT meeting

While this isn't enough to determine who is supplying the group the coffee to sell, the YCPT posted on social media to advertise their coffee, which had a like from a Jason:





Jason Pangburn, as he is named on social media, has been a longtime member of the social media platform that the YCPT uses since 2014 (one of the earliest MilitiaWatch has seen):



Jason lists two companies on his profile: Divinitus Coffee and Beard Rescue. Divinitus Coffee just so happens to be listed on the bag posted by YCPT, too,



It wasn't hard to confirm Jason as the person in charge of Divinitus Coffee, which did, in fact, say it was incorporated in Dewey, Arizona at a location about half an hour away from the YCPT's meeting location at First Southern Baptist Church.



Addresses redacted as part of MilitiaWatch's 'no dox' policy, since these appear to be residential addresses.

Just out of curiosity, we then looked up the Beard Rescue company, which helpfully posted a semi-obscured trademark document on public social media:

Facebook photo uploaded to the “Beard Rescue” Facebook, providing the name and number of the trademark, as well as an estimated time ([archive < https://web.archive.org/web/20210617223317if_/https://www.facebook.com/beardrescueusa/photos/382917108916985>](https://web.archive.org/web/20210617223317if_/https://www.facebook.com/beardrescueusa/photos/382917108916985))

This was not hard to find on the Trademark Electronic Search System, and the owner/registrant was located at the same street address as the Divinitus Coffee LLC (obscured for privacy) in Dewey, Arizona:



Address obscured, highlight added to show town: Dewey, Arizona

To top it all off (and perhaps to make this tangent unimportant), a Facebook account belonging to someone with the same name and with photos that bear the same resemblance posted the following:

Jason Pangburn
May 30 at 6:05 PM

Just completed a 'Stop the Bleed' training put on by YCPT - AZ Oath Keepers up here in Prescott. I hope I never have to use this training but I have been in a number of situations where it would have been very helpful. I wish I did this years ago.

14

3 Comments

This 30 May 2021 post by Jason shows an admittance that he attended one of the YCPT's trainings in Prescott, a city nearer than Chino Valley to the locations Jason's companies are incorporated.

Two developments

There are two important developments that speak to the direction of the YCPT. The first is a recalibration of their brand of Oath Keepers, nationally. The second is the group's new "political wing", launched in June after months of low-grade activity and planning.

Going national

The YCPT came out of a national movement (the Oath Keepers), split from the national organization over being alienated from national, and have now moved to establish a new national organization using their chapter's name. This national organization was created for a few different reasons, a primary one likely is to funnel interest in the Oath Keepers from the 60 Minutes interview towards an organization. As of the time of writing, YCPT's national organization has claimed to have chapters in Arizona and Illinois. Arroyo has said that the national body, like the Arizona chapter that precedes it, is pushing to incorporate as a tax-exempt non-profit to seek federal funding.

While YCPT's incorporation is on the books with the Arizona Corporation Commission, the national organization has yet to clear onto the agency's site. There are delays related to incorporation that may explain this, but it points to the newness of the YCPT's nationwide expansion when compared to the 2-year-long operation window of the YCPT under legal filings with the state.

The YCPT's new national organization appears to be a realization of an aspirational organization that Arroyo and company have been discussing for a while. So far, the organization is only in its infancy, but has established a chapter in Illinois and there are claims of other chapters being organized in Florida and elsewhere. This new development shows the YCPT in AZ understands

to how important it is not to platform the group or their members because they have very much used several prominent media appearances to translate aspiration into organizational inertia. If they keep receiving this kind of major coverage (positive or otherwise), they will likely be able to continue to translate attention into organization.

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Getting political

Established and led by “Lyle Rapacki” of Prescott Arizona, the “Yavapai Patriots” have made a recent feature at YCPT meetings. They filed to incorporate on 26 May 2021 as a domestic LLC for “Civic information and education” as their type. A trade name reservation was submitted in March 2021 ahead of the establishment of the LLC.

On 10 May 2021, Lyle Rapacki’s news about establishing the “Yavapai Patriots” was published on the group’s Facebook, with the subheader of none other than the constantly featured Prescott E-News:



Excerpt of a lengthy announcement post by Lyle J. Rapacki, Ph.D. in establishing the Yavapai Patriots on behalf of "WE THE PEOPLE"

Lyle Rapacki, because this network is so tightly wrapped, is of course also the host of a show on the Prescott E-News media environment. His program, "Arizona Today" has 20 uploads to its name, mostly about theories about how the election can be overturned:



Excerpt of Lyle's videos on the Prescott E-News site (archive)

Rapacki has run intelligence consulting firms for years. In 2009 he incorporated “Sentinel Intelligence Services, LLC”, and by a year later, had apparently written a leaked document labeled as an intelligence briefing on “Mexican Drug Gangs taking Over National Parks”. Within this document, Dr. Lyle argues that these cartels are growing “highly potent marijuana”:

Overview:

Mexico drug cartels stealthily and steadily are moving into the western National Parks of the United States. The absolute intention is to develop sophisticated areas for the growing of highly potent marijuana in farms that are heavily financed, and set-up as armed fortresses.

Marijuana has been cultivated on public lands in the United States for years, and even decades. What is different this time around is the level of sophistication employed by Mexican traffickers and drug cartels. Well-armed guards with AK-47s patrolling the perimeters of these farms, trip wires, kill-zones, land mines and crude IEDS just inside the cartel's designated perimeter, “spotters” with improved radio communications sitting atop high trees or rock formations, are now becoming common place, and a factor law enforcement must consider when interdicting.

The same report also argues that “Drug cartels hire marijuana experts” in their quest for more potent drugs to sell on the American market, which the cartels, Rapacki argues, intend “to take over... similarly to what they have with the methamphetamine business.”

Transparency USA, the group has earned contributions of \$5812 at the time of writing. The largest single donor is Lyle himself, who donated \$1553 to the PAC.

The YCPT is quite cozy with the Yavapai Patriots. Arroyo says he is a member of the Yavapai Patriots and attends their meetings, and allowed a representative to speak at his Oath Keepers meeting in June to fill the void of electoral action that the YCPT's legal standing does not allow.

Prescott E-News is also quite cozy with the Yavapai Patriots. Not only was the group announced on their site and led by one of their writers/content creators, but Dr. Rapacki lists his address as the same building as Prescott E-News. Here's Google's Streetview of the office building, with a Prescott E-News-emblazoned car in the handicap parking outside:



• • •

So who do the Yavapai Patriots fund?

The Yavapai Patriots have only one [expenditure](https://www.transparencyusa.org/az/pac/yavapai-patriots-100543) <
<https://www.transparencyusa.org/az/pac/yavapai-patriots-100543>



[pac/payees](#) on behalf of a candidate. This was \$350 made to the campaign of Mark Finchem, a member of the Arizona House of Representatives. March Finchem is the Arizona [lead](#) < <https://www.phoenixnewtimes.com/news/rep-mark-finchem-was-arizona-coordinator-for-pro-militia-group-11498687>> for the Coalition of Western States, which supported the

Bundy occupation in Malheur Oregon, for which Finchem himself promoted three standoffs over email. Finchem [called](#) < <https://www.phoenixnewtimes.com/news/rep-mark-finchem-oathkeepers-charlottesville-deep-state-conspiracy-11249452>> Unite the Right a “Deep State” operation staged by Democrats, an argument he made in a blog post on his campaign website in 2017 following the deadly riot. Finchem is also a member of the Oath Keepers, according to an interview in 2014, during which he [said](#) < <http://www.inmaricopa.com/mark-finchem-arizona-house-candidate/>> “I’m an Oath Keeper committed to the exercise of limited, constitutional governance.” Finchem, like most politicians listed previously in this post, supported the “Stop the Steal” movement in Arizona, earning himself the [disdain](#) < <https://www.abc15.com/news/state/seven-arizonan-republican-legislators-face-calls-to-ban-them-from-the-house-and-senate>> of many members of the Arizona Legislature.

Network visualization

This article has named a ton of individuals, organizations, and the linkages between them. This can be difficult to grapple in just dry text and an occasional image, so here is a network visualization of all people and organizations mentioned here, sized by number of direct connections:



This is an exceptionally tight network (community detection determined essentially just 1 community of nodes). This is partially due to the way that network nodes were gathered — those who take photos and attend meetings or organize together are likely to do the same with others within the same network. One thing that is telling, though, is how close the GOP and the police are within this network.

The other story here is the potential flow of information from movements outside of the YCPT's immediate sphere and into a large, primed audience. The group is not in direct contact with but also is not far from actors such as Ammon Bundy or Nick Fuentes, for example.

Conclusions

The YCPT appears to be vying for national relevance and legal recognition currently, with the understanding that this could translate to authority and finances tomorrow. Their history of focus on political adversaries, military-flavored response organizations, and endless discussions of US civil war is unavoidably informing this future. The YCPT's ability to bring dozens and hundreds of participants at their events speaks to their size and influence in a waning Oath Keepers field, something they seem to be actively trying to use to their advantage.

<p>1 Joshua D. Bendor, 031908 2 Brandon T. Delgado, 035924 3 OSBORN MALEDON, P.A. 4 2929 North Central Ave., Suite 2100 5 Phoenix, Arizona 85012-2793 6 (602) 640-9000 7 jbendor@omlaw.com 8 bdelgado@omlaw.com</p> <p>9 Orion Danjuma (<i>pro hac vice to be filed</i>) 10 NY Reg No. 4942249 11 PROTECT DEMOCRACY PROJECT 12 82 Nassau St. #601 13 New York, NY 10038 14 Tel: (202) 579-4582 15 orion.danjuma@protectdemocracy.org</p> <p>16 Rachel F. Homer (<i>pro hac vice</i>) 17 DC Bar No. 1045077 18 PROTECT DEMOCRACY PROJECT 19 2020 Pennsylvania Avenue NW, #163 20 Washington, DC 20006 21 Tel: (202) 579-4582 22 rachel.homer@protectdemocracy.org</p> <p>23 Attorneys for Plaintiff</p>	<p>Benjamin L. Berwick(<i>pro hac vice</i>) MA Bar No. 679207 PROTECT DEMOCRACY PROJECT 15 Main Street, Suite 312 Watertown, MA 02472 Tel: (202) 579-4582 ben.berwick@protectdemocracy.org</p> <p>Jared Davidson (<i>pro hac vice to be filed</i>) LA Bar No. 37093 PROTECT DEMOCRACY PROJECT 3014 Dauphine Street, Suite J New Orleans, LA 70117 Tel: (202) 579-4582 jared.davidson@protectdemocracy.org</p>
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16 IN THE UNITED STATES DISTRICT COURT
17 FOR THE DISTRICT OF ARIZONA

18 League of Women Voters of Arizona,
19 Plaintiff,
20 vs.
21 Lions of Liberty LLC; Yavapai County
22 Preparedness Team; Jim Arroyo, Lucas
23 Cilano; Nicholas Cilano; Brian Mounsey;
24 Toby Fox; Bruce Mounsey; James Johnson;
25 Melody Jennings; Clean Elections USA;
26 John Does 1-10,
27 Defendants.

No. CV-22-08196-PCT-MTL

**DECLARATION OF
RACHEL F. HOMER**

28 I, Rachel F. Homer, declare as follows:

- 1 1. I am over the age of 18 and have personal knowledge of the matters stated in this
2 Declaration.
- 3 2. I am an attorney with the Protect Democracy Project, and am counsel for
4 Plaintiff League of Women Voters of Arizona. I submit this declaration to
5 provide the Court true and correct copies of certain documents submitted in
6 support of Plaintiff’s Motion for Temporary Restraining Order and Preliminary
7 Injunction.
- 8 3. **Exhibit A** is a true and correct copy of a Reuters article titled “Fact Check-Does
9 ‘2000 Mules’ provide evidence of voter fraud in the 2020 U.S. presidential
10 election?,” dated May 27, 2022. The article is available at
11 [https://www.reuters.com/article/factcheck-usa-mules/fact-check-does-2000-
14 mules-provide-evidence-of-voter-fraud-in-the-2020-u-s-presidential-election-
15 idUSL2N2XJ0OQ](https://www.reuters.com/article/factcheck-usa-mules/fact-check-does-2000-
12 mules-provide-evidence-of-voter-fraud-in-the-2020-u-s-presidential-election-
13 idUSL2N2XJ0OQ).
- 16 4. **Exhibit B** is a true and correct copy of a Business Insider article titled “Former
17 AG Bill Barr laughs at Dinesh D’Souza’s election conspiracy theory film ‘2000
18 Mules’ in January 6 Committee deposition,” dated June 13, 2022. The article is
19 available at [https://www.businessinsider.com/bill-barr-mocks-2000-mules-film-
21 january-6-deposition-video-2022-6](https://www.businessinsider.com/bill-barr-mocks-2000-mules-film-
20 january-6-deposition-video-2022-6).
- 22 5. **Exhibit C** is a true and correct copy of a Politico.com article titled “Arizona
23 AG’s office asks feds to investigate conservative nonprofit True the Vote,”
24 dated October 14, 2022. The article is available at
25 <https://www.politico.com/news/2022/10/14/arizona-ag-true-the-vote-00061973>.
- 26 6. **Exhibit D** is a true and correct copy of a letter from Reginald “Reggie” Grigsby,
27 Chief Special Agent, Special Investigations Section, Office of Attorney General
28 Mark Brnovich, dated October 14, 2022. The letter is available at
<https://www.azag.gov/sites/default/files/2022-10/202210141445.pdf>.
7. **Exhibit E** is a true and correct copy of a ProPublica article titled “‘Big Lie’
Vigilantism Is on the Rise. Big Tech is Failing to Respond.,” dated June 17,

1 2022. The article is available at [https://www.propublica.org/article/election-](https://www.propublica.org/article/election-fraud-ballot-mules-facebook-tiktok-memes)
2 [fraud-ballot-mules-facebook-tiktok-memes.](https://www.propublica.org/article/election-fraud-ballot-mules-facebook-tiktok-memes)

3 8. **Exhibit F** is a true and correct copy of a New York Times article titled “Hunting
4 for Voter Fraud, Conspiracy Theorists Organize ‘Stakeouts’,” dated August 10,
5 2022. The article is available at

6 [https://www.nytimes.com/2022/08/10/technology/voter-drop-box-conspiracy-](https://www.nytimes.com/2022/08/10/technology/voter-drop-box-conspiracy-theory.html)
7 [theory.html.](https://www.nytimes.com/2022/08/10/technology/voter-drop-box-conspiracy-theory.html)

8 9. **Exhibit G** is a true and correct copy of The Lions of Liberty webpage titled
9 “Operation: Drop Box.” The webpage is archived and available at

10 [https://web.archive.org/web/20221012190606/https://thelionsofliberty.com/opera-](https://web.archive.org/web/20221012190606/https://thelionsofliberty.com/operation-drop-box/)
11 [tion-drop-box/.](https://web.archive.org/web/20221012190606/https://thelionsofliberty.com/operation-drop-box/)

12 10. **Exhibit H** is a true and correct copy of a Verde Valley Independent article titled
13 “Ballot ‘drop watch’ won’t intimidate voters, says ‘Lion’,” dated October 5,
14 2022. The article is available at

15 [https://www.verdenews.com/news/2022/oct/05/ballot-drop-watch-wont-](https://www.verdenews.com/news/2022/oct/05/ballot-drop-watch-wont-intimidate-voters-says-lion/)
16 [intimidate-voters-says-lion/.](https://www.verdenews.com/news/2022/oct/05/ballot-drop-watch-wont-intimidate-voters-says-lion/)

17 11. **Exhibit I** is a true and correct copy of a Vice News article titled “Armed Fringe
18 Groups Are Gearing Up to ‘Protect’ Midterm Ballot Dropboxes,” dated October
19 6, 2022. The article is available at [https://www.vice.com/en/article/dy7wvj/lions-](https://www.vice.com/en/article/dy7wvj/lions-of-liberty-oath-keepers-midterm-ballot-boxes)
20 [of-liberty-oath-keepers-midterm-ballot-boxes.](https://www.vice.com/en/article/dy7wvj/lions-of-liberty-oath-keepers-midterm-ballot-boxes)

21 12. **Exhibit J** is a true and correct copy of a MilitiaWatch article titled “Why, CPT?:
22 Arizona Oath Keepers as a microcosm for the movement,” dated June 28, 2021.
23 The article is available at [https://militia.watch/read/ycpt-az-ok/.](https://militia.watch/read/ycpt-az-ok/)

24 13. **Exhibit K** is a true and correct copy of a Media Matters for America article titled
25 “Steve Bannon hosts QAnon-linked activist to promote organization seemingly
26 focused on intimidating voters,” dated October 17, 2022. The article is available
27 at [https://www.mediamatters.org/steve-bannon/steve-bannon-hosts-qanon-](https://www.mediamatters.org/steve-bannon/steve-bannon-hosts-qanon-linked-activist-promote-organization-seemingly-focused)
28 [linked-activist-promote-organization-seemingly-focused.](https://www.mediamatters.org/steve-bannon/steve-bannon-hosts-qanon-linked-activist-promote-organization-seemingly-focused)

- 1 14. **Exhibit L** is a true and correct copy of a post by user @TrumperMel on Truth
2 Social, dated September 8, 2022.
- 3 15. **Exhibit M** is a true and correct copy of a post by user @TrumperMel on Truth
4 Social, dated October 17, 2022.
- 5 16. **Exhibit N** is a true and correct copy of a post by user @TrumperMel on Truth
6 Social, dated October 16, 2022.
- 7 17. **Exhibit O** is a true and correct copy of a post by former President Donald J.
8 Trump under username @realDonaldTrump on Truth Social, on or around
9 October 16, 2022.
- 10 18. **Exhibit P** is a true and correct copy of a post by reporter Nicole Grigg under
11 username @NicoleSGrigg on Twitter, dated October 19, 2022. The video
12 included in the post is available at
13 <https://twitter.com/NicoleSGrigg/status/1582887636884066304>.
- 14 19. **Exhibit Q** is a true and correct copy of a post by user @TrumperMel on Truth
15 Social, dated October 19, 2022.
- 16 20. **Exhibit R** is a true and correct copy of a post by reporter Nicole Grigg under
17 username @NicoleSGrigg on Twitter, dated October 23, 2022.
- 18 21. **Exhibit S** is a true and correct copy of a post by user @TrumperMel on Truth
19 Social, on or around October 21, 2022.
- 20 22. **Exhibit T** is a true and correct copy of a post by user @TrumperMel on Truth
21 Social, dated October 17, 2022.
- 22 23. **Exhibit U** is a true and correct copy of a post by reporter Nicole Grigg under
23 username @NicoleSGrigg on Twitter, dated October 19, 2022. The video
24 included in the post is available at
25 <https://twitter.com/nicolesgrigg/status/1582904476393820160>.
- 26 24. **Exhibit V** is a true and correct copy of a post by user @TrumperMel on Truth
27 Social, dated October 22, 2022.

28

- 1 25. **Exhibit W** is a true and correct copy of an Arizona Mirror article titled
- 2 “Republicans are urging vigilantes to watch ballot drop boxes, polling locations,
- 3 to sniff out fraud,” dated August 2, 2022. The article is available at
- 4 [https://www.azmirror.com/2022/08/02/republicans-are-urging-vigilantes-to-](https://www.azmirror.com/2022/08/02/republicans-are-urging-vigilantes-to-watch-ballot-drop-boxes-polling-locations-to-sniff-out-fraud/)
- 5 [watch-ballot-drop-boxes-polling-locations-to-sniff-out-fraud/](https://www.azmirror.com/2022/08/02/republicans-are-urging-vigilantes-to-watch-ballot-drop-boxes-polling-locations-to-sniff-out-fraud/).
- 6 26. **Exhibit X** is a true and correct copy of a post by State Senator Kelly Townsend
- 7 under username @AZKellyT on Twitter, dated October 24, 2022.
- 8 27. **Exhibit Y** is a true and correct copy of a post by reporter Jack Healy under
- 9 username @jackhealyNYT on Twitter, dated October 27, 2022.
- 10 28. **Exhibit Z** is a true and correct copy of a post by user @JeannieGiering on
- 11 Twitter, dated July 31, 2022.

12

13 I declare under penalty of perjury that the foregoing Declaration is true and correct.

14

15

16 Executed on October 28, 2022. /s/ Rachel F. Homer

17 Rachel F. Homer

18

19

20

21 DATED this 28th day of October, 2022.

22

23 OSBORN MALEDON, P.A.

24 By s/ Joshua D. Bendor

25 Joshua D. Bendor

26 Brandon T. Delgado

27 2929 North Central Avenue, Suite 2100

28 Phoenix, Arizona 85012-2793

 Orion Danjuma (*pro hac vice to be filed*)

 PROTECT DEMOCRACY PROJECT

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Attorneys for Plaintiff

Exhibit A



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REUTERS FACT CHECK MAY 27, 2022 / 8:29 AM / UPDATED 5 MONTHS AGO

Fact Check-Does '2000 Mules' provide evidence of voter fraud in the 2020 U.S. presidential election?

By Reuters Fact Check

16 MIN READ



A documentary directed by conservative commentator Dinesh D'Souza claims it can prove widespread fraud was carried out during the 2020 presidential election in the United States. Reuters Fact Check examined the main claims presented in the film and did not find any concrete evidence definitively showing proof of fraud.

The 90-minute film "2000 Mules" sees D'Souza team up with True the Vote, a Texas-based nonprofit that describes itself as protecting election integrity (www.truethetvote.org/about/), to investigate alleged voter fraud in Arizona, Georgia, Michigan, Pennsylvania and Wisconsin.

All five of the listed states were swing states in 2020 that ultimately backed Joe Biden for president - and were later central to baseless speculations of fraud.

Reuters has covered this topic extensively ([here](#)) and ([here](#)), as well as in fact checks ([here](#)), ([here](#)) and ([here](#)).

D'Souza's documentary says Biden victories in swing states could be thanks to 2,000 people - or "mules" - who were hired by unnamed nonprofits - dubbed "stash

houses” - to conduct “ballot trafficking” i.e. stuffing numerous drop boxes with potentially fake absentee ballots.

It also alleges that the so-called “mules” were paid \$10 for every fake ballot they submitted.

D’Souza did not respond to multiple requests for comment from Reuters.

THE METHODOLOGY

D’Souza and True the Vote analyzed surveillance footage of drop boxes mostly from Georgia, as well as “some” from Arizona, along with “geotracking” data purchased from unnamed brokers.

The “geotracking” data was gleaned from cellphone apps pinpointing device location and movements between Oct. 1, 2020, and election day, Nov. 3, for Arizona, Michigan, Pennsylvania and Wisconsin, according to the documentary. Data for Georgia stretched until January, when there was a runoff vote.

The documentary alleges that by tracking phone locations to the addresses of five alleged “stash house” nonprofits and 10 or more drop boxes, the “mules” were identified.

There were 242 people in Atlanta, Georgia, who fitted the bill; 200+ in Arizona; 100 in Milwaukee, Wisconsin; 500+ in Michigan, and 1,000+ mules in Philadelphia, Pennsylvania – totaling over 2,000 “mules”.

Viewers were then shown multiple surveillance footage clips of different people at drop boxes, which the documentary said it had identified as some of the ballot traffickers carrying out their crimes.

Multiple concerns were raised by experts speaking to Reuters about the “geotracking” portion of the documentary. It was unclear whether the same test was applied anywhere other than the swing states in question (to prove a unique phenomenon had happened), along with data validity, accuracy, and discussion about other possibilities that could explain the findings.

“The entirety of the claim rests on cell phone location data, which doesn’t remotely show that people were actually using the drop boxes (it doesn’t have the granularity to show that, as opposed to just walking or even driving by),” said Kenneth R Mayer, Professor of Political Science at the University of Wisconsin-Madison, who spoke to Reuters via email.

According to True the Vote founder Catherine Engelbrecht, who spoke in the documentary, the dataset had been validated because it was used by the organization to solve two murder cases that were “ebbing on cold case status”.

Only one murder case was detailed as an example in the documentary – that of eight-year-old Secoria Turner on July 4, 2020, in Atlanta – and which authorities told NPR was solved without anything to do with Engelbrecht ([here](#)).

D’Souza, meanwhile, claimed without offering evidence that the dataset had the “reliability of a fingerprint”, expanding in a later podcast interview that it was accurate to between “12 and 18 inches” ([here](#)).



Experts speaking to Reuters disagreed.

“I have never heard that geotracking using cell phones could have errors as low as 12-18 inches,” said Chen Qian, Associate Professor at the Department of Computer Science and Engineering at University of California, Santa Cruz. “This range is way below the ranges reported by scientists and engineers.

“A research paper written by AT&T and Purdue University researchers in 2020 predicted that the average location error of 5G networks would vary from 2 meters to >10 meters,” said Qian. “Note their results are simulated results in ideal settings, used for predictions. They are not real experiments, because 5G has not been available everywhere. In real environments the errors would be larger.” ([here](#))

Moreover, drop boxes tend to be in high-traffic areas such as public libraries, shopping malls, municipal buildings, or schools. For example, a map of drop boxes in the five metro Atlanta counties of Fulton, DeKalb, Cobb, Gwinnett and Clayton shows that all are clustered in busy locations likely to have high cell phone activity ([here](#)).

“My local drop box is in my public library, a location I pass probably 20 or 30 times a week,” said Paul Gronke, Director of the Elections and Voting Information Center at Reed College in Oregon (evic.reed.edu/). “Did I deposit 20 ballots or is my drop box on a heavily trafficked street? You tell me.”

True the Vote said in the documentary it had ruled out people where it believed their “pattern of life” outside the election period involved travelling to nonprofits and drop box locations. They did not offer information on how they did this or who these people were.

However, Barry C Burden, Director of the Elections Research Centre at the University of Wisconsin- Madison (elections.wisc.edu/), told Reuters via email that there were still acceptable reasons for observed heightened activity during election periods.

He said: “Some of the individuals tracked might even have been election workers checking on or emptying the drop boxes, so it would be a sign of vigilance by election officials rather than nefarious behavior.”

SURVEILLANCE VIDEO

To corroborate the geotracking dataset, True the Vote said it had compared it with surveillance video covering locations of some of the drop boxes.

They claimed to have access to 4 million minutes of footage, which was mostly from Georgia. The documentary makers said some of the surveillance cameras were turned off in Arizona and that there was no footage from Wisconsin. No information was provided about surveillance footage from Michigan or Pennsylvania.

Reuters was unable to examine these alleged minutes of footage, but the videoclips presented in the documentary alone do not provide proof of fraud.

When Reuters asked Engelbrecht via email how “mules” identified via geotracking data were then matched to surveillance footage, she responded: “Matches are made by comparing the location and time stamp of the video to the location and the time stamp of the individual device.”

The documentary shows several surveillance clips said to reveal “mules” stuffing fake ballots in the drop boxes.

In one clip, a couple of ballots appear to drop to the floor as one man goes to post; the documentary makers suggest this is suspicious, as well as the man allegedly posting the ballots late at night.

In another, a woman wearing a face mask and gloves is seen posting a ballot before turning to place her gloves in a nearby bin. It is claimed in the documentary that she is a “mule” because she was wearing gloves (to hide her fingerprints) and did not look at the bin, so must have had prior knowledge of it being there. The documentary makers did not appear to consider the possibility that the woman was wearing gloves, along with her face mask, as a personal protective measure against COVID-19.

The unidentified woman was also said to have visited “dozens and dozens” of drop boxes; however, no other clips of her, nor any further evidence, were shown.

Two other clips show men in separate locations taking photos of themselves posting their ballot, which the documentary makers allege was to provide evidence of the job done so the “mules” can get paid.

In a Fox News interview, Engelbrecht claimed the average number of visits by a “mule” to a drop box was 38 ([here](#)). Yet none of the surveillance videos showed the same person more than once.



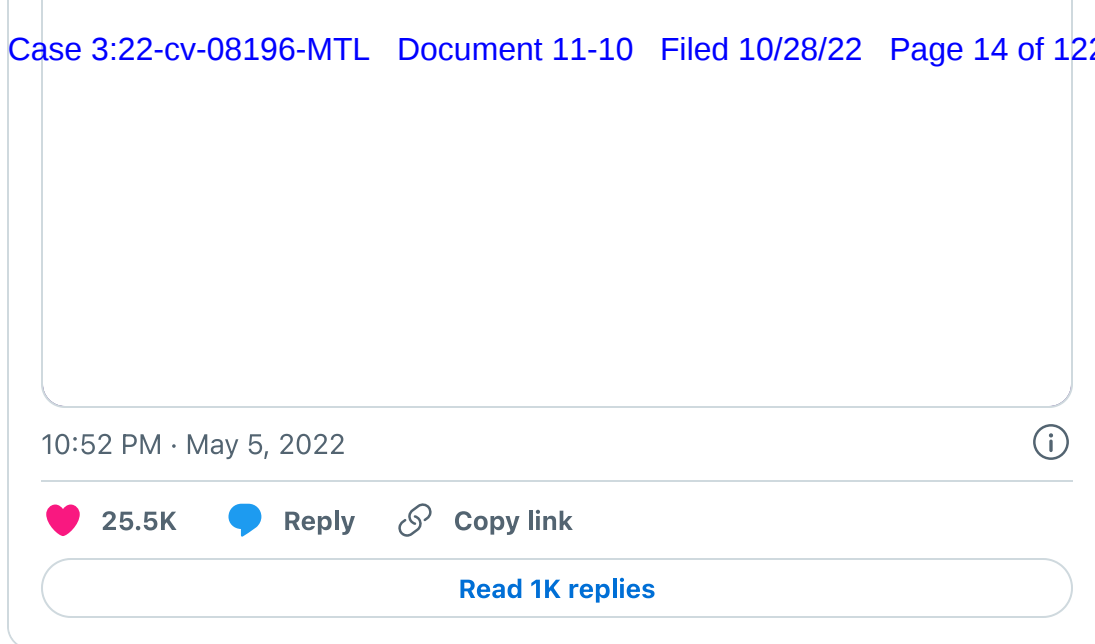
Liz Harrington
@realLizUSA · [Follow](#)



The average ballot trafficker made 38 TRIPS to drop boxes.

And it's on tape!

[Watch on Twitter](#)



BALLOT HARVESTING VS FRAUDULENT BALLOTS

Some of the people in Georgia who were presented in surveillance footage as so-called “mules” were seen posting more than one ballot at once, which the documentary makers suggested was proof of voter fraud.

But this doesn’t necessarily constitute fraud. Ballot harvesting, the posting of completed ballots on behalf of a third party, is legal in several states, including Georgia ([n-there](#)).

“Some of the so-called “mules” might have been legitimate family members putting in ballots in Georgia,” said Theodore Allen, Associate Professor at Ohio State University, specializing in the administering of elections.

“Many people need encouragement to vote and offering to collect and bring to ballot boxes is, in many states, a legal and legitimate way to increase voter participation which is often low.”

Reuters also spoke to M.V. (Trey) Hood III, Professor in the Department of Political Science at the University of Georgia, to understand the legality around dropping off

conflated, and there are protections in place in Georgia to prevent the posting of fraudulent ballots.

“[In Georgia] In 2020 we were using signature verification to verify absentee ballots, so there were safety mechanisms in place to ensure it wasn’t a fraudulent ballot.”

He added: “I haven’t seen any hard evidence being offered up that these ballots were fraudulent.”

Reuters looked into a video posted in May claiming to show one such “mule”.

Pennsylvania county authorities debunked the “evidence” by confirming it showed a designated agent dropping ballots off on behalf of individuals who are unable to ([here](#)).

Ultimately, ‘2000 Mules’ speculates that the so-called ballot-traffickers were dropping off fraudulent ballots – but the film does not prove this. The ‘faked’ ballots were never opened and inspected, nor were the suspected “mules” on surveillance questioned, aside from one anonymous “informant” who says she never saw inside the supposed fraudulent ballots.

COULD BALLOTS BE FORGED?

The documentary claims its investigation reveals the potential existence of 380,000 overall fraudulent ballots. And, it claims, if all of these contained falsified votes for Joe Biden, the revelation is significant enough to have blocked a win by Donald Trump.

Listing all of the steps needed to falsify a ballot, Gronke told Reuters: “1) You need a falsified ballot with a unique bar code, printed on special paper, and a special

envelope. If the claim is that you've somehow obtained 400,000 original ballots without the elections officials or voters knowing, how precisely did you do this?

“2) You need to successfully forge the voter’s signature. 3) You need to deposit the envelope and have it validated by a local official.

“Congratulations! Besides committing a felony, you have now cast ONE fraudulent ballot. Now you need to figure out how to do that hundreds of thousands of times, in different jurisdictions, with different ballot styles and different voting materials.”

Gronke’s sentiments were echoed by Christopher B. Mann, Associate Professor of Political Science at Skidmore College, who told Reuters: “If there are 400,000 people who had their ballot collected and returned for nefarious reasons, there should be significant numbers of people willing to tell their story. It is hard for two people to keep a secret. Asserting that 400,000 people are keeping a secret is beyond credibility.”

Reuters has previously explored the safeguards in place that make forging ballots on behalf of others difficult ([here](#)), ([here](#)).

2020 ELECTION FOUND SAFE AND SECURE

False claims pedaled by former U.S. President Donald Trump and his followers blaming widespread voting fraud for the 2020 election results have been rejected by courts, state governments and members of his own former administration ([here](#)).

U.S. election security officials have said the election was “the most secure in American history” ([here](#)), ([here](#)).



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NEW: A joint statement from the Elections Infrastructure

Government Coordinating Council and Sector Coordinating Council Executive Committees regarding the 2020 general election:

[nased.org/news/jointstat...](#)

[#TrustedInfo2020](#) [#Protect2020](#)

5:47 PM · Nov 12, 2020

247 [Reply](#) [Copy link](#)

[Read 35 replies](#)

Former U.S. Attorney General William Barr, the nation’s top law enforcement official under Trump, said on Dec. 1, 2020, that he had not seen any evidence of fraud that would have changed the election results ([here](#)).

Furthermore, more than 50 lawsuits brought by Trump or his allies alleging election fraud or other irregularities were dismissed by state and federal judges ([here](#)).

VERDICT

The documentary “2000 Mules” does not provide any concrete, verifiable evidence of widespread voter fraud in the 2020 election. Technology and election integrity experts consulted by Reuters also did not find the geolocation, surveillance or any other information presented showed plausible evidence of fraud.

This article was produced by the Reuters Fact Check team. Read more about our fact-checking work [here](#).

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All quotes delayed a minimum of 15 minutes. See [here](#) for a complete list of exchanges and delays.

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Exhibit B

US MARKETS CLOSED In the news

▼ Dow Jones +0.61% ▲ Nasdaq -1.88% ▲ S&P 500 -0.61% ▲ META -24.56% ▼ TSLA +0.2%

HOME > POLITICS

Former AG Bill Barr laughs at Dinesh D'Souza's election conspiracy theory film '2000 Mules' in January 6 Committee deposition

Grace Panetta Jun 13, 2022, 1:16 PM



US Attorney General Bill Barr is pictured on October 15, 2020. [Jeff Roberson/Pool/AFP via Getty Images](#)

Former AG Bill Barr mocked and trashed the conclusions of film "2,000 Mules."

The film, made by Dinesh D'Souza and True The Vote, claims fraud took place at ballot drop boxes.

Barr called the film, which has also been panned by experts, as "unimpressive" and "indefensible."

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Former Attorney General Bill Barr mocked the premise of "2000 Mules," a conspiratorial movie that purports to show massive fraud with ballot dropboxes in the 2020 election. The film has been widely panned by experts and fact-checkers.

The committee's hearing on Monday focused on the election lies President Donald Trump Trump and his allies spread to discredit the 2020 election results. The hearing featured extended clips from Barr's sworn deposition before the committee.

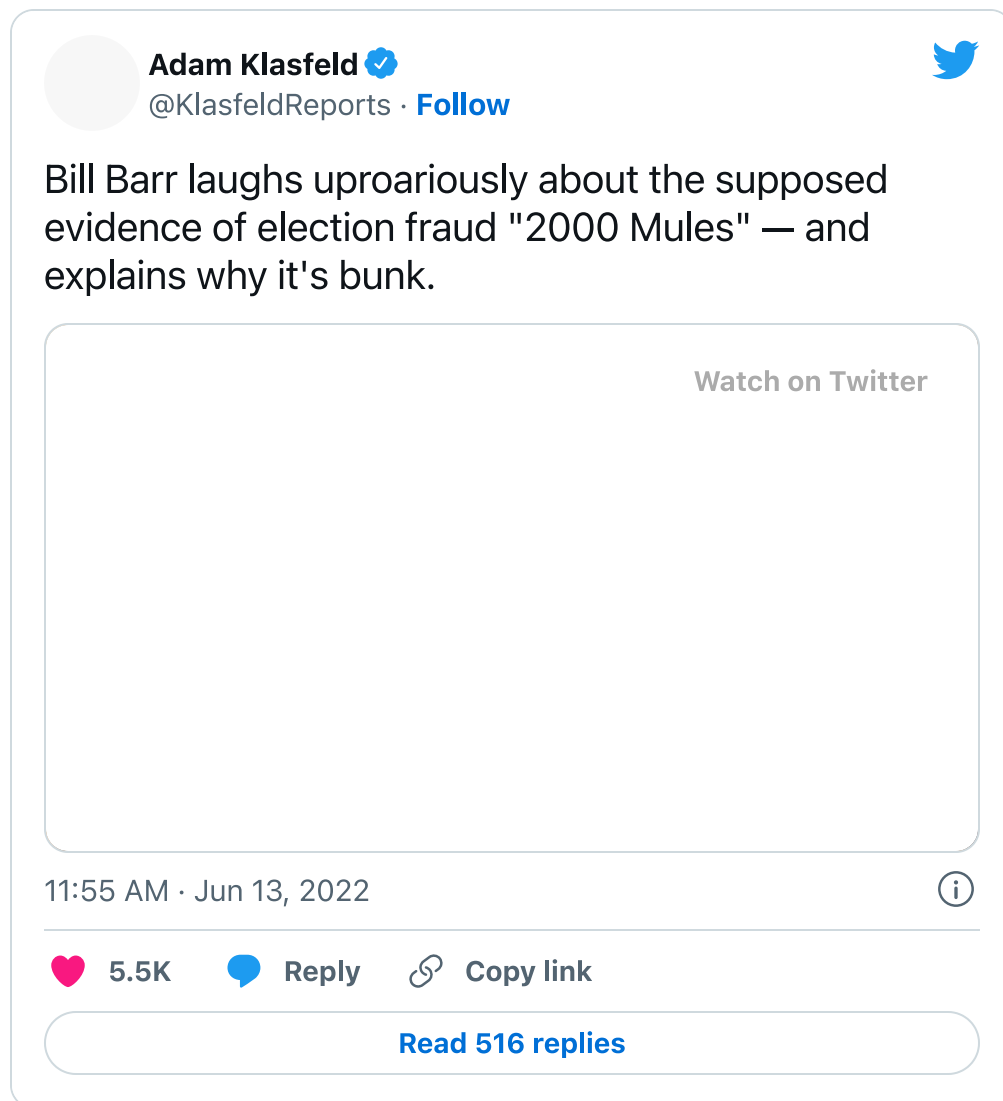
"The election was not stolen by fraud, and I haven't seen anything since the election that changes my mind on that, including the '2000 Mules' movie," Barr said in his deposition, laughing.

The film, made by conservative activist Dinesh D'Souza and conservative election-focused group True The Vote, uses surveillance footage, photographs, and geolocation data from cellphones in key swing states to argue that people -- the "mules" -- committed election fraud by essentially stuffing ballot dropboxes with fraudulent ballots.


But election experts say that the evidence presented by the filmmakers isn't enough to show widespread improper activity with dropboxes, much less a conspiracy to steal the election.

"The [Georgia Bureau of Investigation] was unimpressed with it. I

"The cellphone data is singularly unimpressive," Barr added. "Basically, if you take 2 million cellphones and figure out where they are physically in a big city like Atlanta or wherever, by definition, you're going to find many hundreds of them that have passed by and spent time in the vicinity these boxes. And the premise that if you go by five boxes or whatever it was, that that's a mule, is indefensible."






A screenshot of a tweet from Adam Klasfeld (@KlasfeldReports). The tweet text reads: "Bill Barr laughs uproariously about the supposed evidence of election fraud '2000 Mules' — and explains why it's bunk." Below the text is a video player with the text "Watch on Twitter". The tweet is dated 11:55 AM · Jun 13, 2022. It has 5.5K likes, a reply icon, and a copy link icon. At the bottom, there is a button that says "Read 516 replies".

Adam Klasfeld 
@KlasfeldReports · [Follow](#)

Bill Barr laughs uproariously about the supposed evidence of election fraud "2000 Mules" — and explains why it's bunk.

Watch on Twitter

11:55 AM · Jun 13, 2022

 5.5K  Reply  Copy link

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The Associated Press' in-depth fact check of the movie described the film as "based on faulty assumptions, anonymous accounts and improper analysis of cellphone location data, which is not precise

enough to confirm that somebody deposited a ballot into a drop box, according to experts." Case 3:22-cv-08196-MTL Document 11-10 Filed 10/28/22 Page 23 of 122

One reason that cellphone data is an imperfect measure of how many ballots are dropped off at a dropbox is that many ballot dropboxes are located in high-trafficked, easily-accessible public spaces like libraries, town halls and other government buildings, and even grocery stores.

President Donald Trump's spokeswoman Liz Harrington also asserted that the cellphone data collected by the makers of "2,000 Mules" helped solve the murder of a young girl in Atlanta, a claim discredited by True the Vote themselves, who acknowledged to NPR they contacted law enforcement two months after arrests had already been made in the murder.

Barr described the photographic evidence in the film as "lacking" and noted that even if the filmmakers *had* shown that so-called ballot harvesting occurred, it wouldn't be enough to prove that those votes were fraudulent or would have swung the result of the election.

"Courts are not gonna throw out votes and then figure out what votes are harvested and throw them out," Barr said in his deposition. "The burden is on the challenging party to show that illegal votes were cast, that the votes were the result of undue influence or bribes...absent that evidence, I didn't see courts throwing out votes anyway."

D'Souza slammed the committee and Barr in a number of tweets, calling Barr ignorant and "a fat guy."

"The debunkers have themselves been thoroughly debunked. And all of them are too cowardly to debate the issue with me. As is the January 6 Committee." D'Souza wrote in a subsequent tweet

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POLITICS

Arizona AG asks the FBI to investigate the group behind the right-wing election conspiracy theory film '2000 mules'

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Exhibit C



LEGAL

Arizona AG's office asks feds to investigate conservative nonprofit True the Vote

The group propagated claims of vote fraud by relying on geolocation data, which became the central focus of the movie "2000 Mules."



The letter, dated Friday, is particularly remarkable coming from the office of Brnovich, a Republican who once vied for Trump's support in a Senate GOP primary bid that hinged on false claims about the 2020 election results. | Bob Christie/AP Photo

By **KYLE CHENEY** and **NICHOLAS WU**

10/14/2022 10:00 PM EDT



The office of Arizona Attorney General Mark Brnovich is asking the FBI and IRS to investigate True the Vote, a conservative vote-monitoring nonprofit

Reginald Grigsby, an investigator with Brnovich's office, [described a series of questionable interactions](#) with the group's leaders and suggested there may be evidence of financial improprieties if the agencies pursued them.

"Given TTV's status as a nonprofit organization, it would appear that further review of its financials may be warranted," Grigsby wrote.

The letter, dated Friday, is particularly remarkable coming from the office of Brnovich, a Republican who once vied for Trump's support in a Senate GOP primary bid that hinged on false claims about the 2020 election results.

The IRS and the FBI's Phoenix field office did not immediately respond to requests for comment. A True the Vote spokesperson could not immediately be reached for comment.

Grigsby urged the federal agencies to pursue the group after what it described as multiple suspicious interactions with leaders Catherine Engelbrecht and Gregg Phillips. Grigsby said the pair met with state investigators three times since early 2021 and promised to provide data it said would prove widespread fraud in the 2020 election — but the evidence never arrived.

Even though the group never turned over the promised data, Grigsby wrote, it began publicly claiming that it had given the state a hard drive — a claim Grigsby indicated the group also made to the Arizona Senate and to the Phoenix office of the FBI.

"Not only is this patently false, TTV acknowledged via correspondence and during a meeting with them that they had not given us the information but that they would," he wrote.

True the Vote propagated claims of vote fraud by relying on geolocation data, which became the central focus of the movie "2000 Mules." Trump has cited the movie as proof the election was stolen, and he's praised the group's work. But the movie's claims have been sharply called into question by federal investigators and researchers who have tested its theories.

Former Attorney General Bill Barr delivered a forceful rebuke of the movie's premise in testimony to the Jan. 6 select committee. He told the panel that in any metropolitan area, geolocation data would likely show "hundreds" of people who passed by drop boxes on multiple occasions.

"The premise that if you go by a box, five boxes or whatever it was, you know that that's a mule is just indefensible," Barr said, adding, "It didn't establish widespread illegal harvesting," Barr said.

Despite Barr's mockery of the premise, Trump has promoted its claims both online and during his public events.

In an April 2022 meeting, Grigsby said the group claimed to have evidence of "243 mules" who had stuffed ballot boxes in Arizona. But they presented no hard evidence to back it up, he said.

In his most recent meeting with the group on June 1, Grigsby said Engelbrecht and Phillips indicated they had shared all their data with the FBI and were working with the bureau as informants. But he said the FBI's Phoenix field office quickly confirmed this to be false and said the group had, in turn, told FBI agents to contact Brnovich's office to obtain their data.

Grigsby also flagged the nonprofit status of the organization, noting the "considerable sums of money" they had raised while alleging massive voter fraud and promises to provide law enforcement with the information — even as they remained unable to provide the information.

FILED UNDER: FBI, ARIZONA, DONALD TRUMP, DONALD TRUMP 2020, 2020 PRESIDENTIAL CANDIDATES, 2020 ELECTIONS,



Huddle

A play-by-play preview of the day's congressional news



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Exhibit D



Washington, D.C. 20004

U.S. District Court for the District of Columbia

Case No. 22-cv-01234

Date Filed: 10/28/22

Notice of Hearing

The undersigned hereby certifies that the following information is true and correct to the best of the undersigned's knowledge and belief, and that the undersigned is not aware of any information that would make this information false or misleading.

Background and Summary of Proceedings

This case involves a dispute over the ownership of certain intellectual property rights.

The parties have agreed to a settlement of the dispute, and the undersigned is pleased to announce that the parties have entered into a final judgment of settlement. The settlement provides for the payment of a sum of money to the plaintiff, and the dismissal of the case with prejudice. The parties have also agreed to certain provisions regarding the future use of the intellectual property in question.

The undersigned is satisfied with the terms of the settlement, and believes that it represents a fair and equitable resolution of the dispute. The undersigned is pleased to announce that the parties have entered into a final judgment of settlement, and that the case is now closed.

The undersigned is pleased to announce that the parties have entered into a final judgment of settlement, and that the case is now closed. The undersigned is satisfied with the terms of the settlement, and believes that it represents a fair and equitable resolution of the dispute.

The undersigned is pleased to announce that the parties have entered into a final judgment of settlement, and that the case is now closed. The undersigned is satisfied with the terms of the settlement, and believes that it represents a fair and equitable resolution of the dispute.

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Exhibit E

Technology

“Big Lie” Vigilantism Is on the Rise. Big Tech Is Failing to Respond.

Stolen-election activists and Trump supporters have embraced a new tactic in their campaign to unearth supposed proof of fraud in the 2020 presidential race: using social media to chase down a fictional breed of fraudster known as a “ballot mule.”



Alex Bandoni/ProPublica. Source Image: Mark Makela/Getty Images.

by **Andy Kroll**

June 17, 12 p.m. EDT

ProPublica is a nonprofit newsroom that investigates abuses of power. Sign up to receive [our biggest stories](#) as soon as they're published.

Update, June 21, 2022: Spokespeople for Facebook, TikTok and Twitter said they would remove posts flagged by ProPublica for violating their respective community standards policies. This story has also been updated to include comment from True the Vote, which the organization sent after our story published.

The dummied-up flyer bore the hallmarks of a real WANTED poster. A grainy photo of a woman outside an election office in the suburbs of Atlanta stamped with the word “WANTED.” An image of a sheriff’s badge and the phone number for the Gwinnett County Sheriff’s Office. The implication was clear: The woman was being sought by the local sheriff for voter fraud.

The flyer was fake, and though the sheriff’s office eventually called it out, the false poster went viral, amassing tens of thousands of shares, views and threatening comments on Facebook, Twitter and TikTok and raising fears that harm could come to the unidentified woman.

Stolen-election activists and supporters of former President Donald Trump have embraced a new tactic in their ongoing campaign to unearth supposed proof of fraud in the 2020 presidential race: chasing down a

Inspired by a conservative documentary film that has won praise from Trump and his allies — and debunking from critics including former Attorney General William Barr — self-styled citizen sleuths are posting and sharing photos of unnamed individuals and accusing them of election crimes. They are calling on their followers to help identify these “ballot mules,” who are accused of having violated laws against dropping off multiple absentee ballots during the 2020 election. A state lawmaker in Arizona has even encouraged people to act as “vigilantes” and catch future “mules.”

Promoting such false information violates the policies of Facebook, Twitter and TikTok. Facebook’s [“Community Standards”](#) says its policy is to remove content that incites harassment or violence or impersonates government officials. [Twitter](#) and [TikTok](#) have similar rules and guidelines for what can and can’t appear on their platforms.



Screenshot captured and redacted by ProPublica

ProPublica identified at least a dozen additional posts on Twitter, Facebook and TikTok that accuse unnamed individuals of being “ballot mules” and engaging in allegedly illegal activity. Some of these posts echo the “WANTED”-style language seen in the Gwinnett County meme, while others include similar calls to action to identify the individuals.

None of the posts reviewed by ProPublica include evidence that any of the people depicted in the posters engaged in illegal activity. Yet the social media companies have reacted slowly or not at all to such posts, some of which clearly violate their policies, experts say.

Disinformation researchers from the nonpartisan clean-government nonprofit Common Cause alerted Facebook and Twitter that the platforms were allowing users to post such incendiary claims in May. Not only did

the claims lack evidence that crimes had been committed, but experts worry that poll workers, volunteers and regular voters could face unwarranted harassment or physical harm if they are wrongfully accused of illegal election activity.

So far, there is no sign that any of the people depicted have been identified or suffered any threats.

Emma Steiner, a disinformation analyst with Common Cause who sent warnings to the social-media companies, says the lack of action suggests that tech companies relaxed their efforts to police election-related threats ahead of the 2022 midterms.

“This is the new playbook, and I’m worried that platforms are not prepared to deal with this tactic that encourages dangerous behavior,” Steiner said.

Spokespeople for Facebook, TikTok and Twitter said they would remove posts flagged by ProPublica for violating their respective community standards policies.

Thirty-one states allow a third party to collect and return an absentee or mail-in ballot on behalf of another voter. These laws help voters who are disabled or infirm, live in spread-out rural areas or reside on tribal lands with limited access to polling places or ballot drop boxes. In states with a history of absentee voting, both Democratic and Republican operatives have engaged in organized ballot-collection drives.

Critics, labeling the practice “ballot harvesting,” have sought to restrict its use, warning about the potential for fraud. However, incidents of proven fraud related to ballot collection are extremely rare. A database maintained by the conservative Heritage Foundation identifies just 238 cases of “fraudulent use of absentee ballots” since 1988. One high-profile case of fraud involving absentee ballots occurred in a 2018 North Carolina congressional race. A Republican operative engaged in a ballot-tampering scheme involving hundreds of ballots. The state election board later threw out the election result and ordered a redo. It was likely the first federal election overturned due to fraud, according to historians and election-law experts.

The phrases “ballot mules” and “ballot trafficking” — with their intentional echoes of the language of drugs and cartels — started to gain traction online in 2021, according to Mike Caulfield, a misinformation researcher at the University of Washington’s Center for an Informed Public. An analysis by Caulfield and his colleagues found that prominent Republicans including House Minority Leader Kevin McCarthy and Republican National Committee Chairwoman Ronna Romney McDaniel invoked “ballot trafficking” last spring.

But it wasn’t until conservative provocateur Dinesh D’Souza and a discredited conservative group called True the Vote last fall began to tease findings that would later appear in D’Souza’s movie “2000 Mules” that uses of “ballot trafficking” and “ballot mules” shot up, according to Caulfield’s research.

The “2000 Mules” film claims that a network of thousands of people illegally stuffed ballot boxes in swing states to steal the presidency for Joe Biden. It draws heavily on the work of True the Vote, which purported to use surveillance footage and geolocation data to make its claims of illegal ballot activity.

found the conclusions of “2000 Mules” far from convincing. “My opinion then and my opinion now,” he said, “is that the election was not stolen by fraud, and I haven’t seen anything since the election that changes my mind on that, including the ‘2000 Mules’ movie.”

True the Vote founder Catherine Engelbrecht said her group had never spoken with Barr and disputed the notion that True the Vote had not proven its claims about voter fraud. “I do think that when 80%+ of America is concerned about election integrity, something must be done to address the situation,” she said. “It is the failure of leaders across all branches of government, who have allowed lawlessness to be the new law, that we find ourselves where we do.” D’Souza did not respond to a request for comment.

Despite its flimsy conclusions, “2000 Mules” found an enthusiastic audience in Trump and his supporters. In early May, Trump screened the film at his Mar-a-Lago private club. The film has since earned nearly \$1.5 million at the box office, according to Box Office Mojo. In a recent 12-page letter responding to the public hearings organized by the Jan. 6 select committee, Trump cited “2000 Mules” nearly 20 times.

As the film’s dubious claims have spread online, stolen-election activists are creating and sharing online content purporting to reveal more “mules” and accusing those individuals of illegal behavior without actual evidence of wrongdoing.

The most striking example is the meme that depicts an older white woman leaving a ballot drop box in Georgia’s suburban Gwinnett County. The word “WANTED” appears above her head as does the image of a sheriff’s badge labeled “Gwinnett County” and the sheriff office’s phone number.

“Ballot mule,” the meme says. “If you can ID her, call Gwinnett Co. sheriff’s office.”

A spokeswoman for the Gwinnett County Sheriff’s Office says the meme is fake. The sheriff’s office hasn’t received calls purporting to identify the woman. The spokeswoman said that the office was investigating who created the meme.

ProPublica was unable to identify the woman in the “WANTED” meme. A spokesman for the Gwinnett County elections office confirmed that the name tag worn by the woman in the meme matched those worn by county election workers in 2020. He also verified that the drop box in the video was located outside of the county’s election headquarters.

The origins of the woman’s photo in the “WANTED” meme appear to point back to a Georgia businessman and self-described election-fraud investigator named David Cross.

For months Cross has posted short clips of surveillance footage showing people depositing ballots at drop boxes in Gwinnett County. Cross sometimes narrates these videos and makes unverified accusations of illegal ballot harvesting. In a clip that Cross posted online on May 3, an older white woman — the same woman in the “WANTED” meme — deposits multiple ballots into the drop box outside the headquarters for Gwinnett County’s elections office. In his narration, Cross accuses the woman of depositing as many as 35 ballots, though it’s not at all clear from

the video exactly how many ballots the woman deposited. “Totally illegal,” he says in the video. (Cross did not respond to requests for comment.)

Georgia law prohibits many third parties from submitting a ballot that’s not their own. However, the law makes exceptions for caregivers for the elderly and the disabled, immediate family members, members of the same household, in-laws, nieces, nephews, grandchildren and more.

Cross, the Georgia activist, has filed complaints with the State Election Board and secretary of state’s office alleging illegal ballot deliveries and citing his surveillance footage clips. Last month, the State Election Board dismissed three complaints alleging “ballot harvesting” after an investigation by the secretary of state’s office found that the alleged “mules” were voters dropping off ballots for themselves and family members.

A spokesman for Georgia Secretary of State Brad Raffensperger told ProPublica that the office has a pending investigation into the woman in the “WANTED” meme. The spokesman, Walter Jones, stressed that no one should assume that an individual shown in a video delivering multiple ballots is automatically guilty of a crime, nor would the ballots in question be invalidated even if someone had violated the state’s ballot-collection law.

The video published by Cross of the woman at the Gwinnett County drop box spread rapidly online. Twitter users accused the woman of being one of the “2000 mules” and urged their followers to “MAKE HER FAMOUS!” — in other words, reveal her identity and share it widely.

One Twitter user shared the woman’s image with the “WANTED” text and the fake Gwinnett County sheriff’s badge. “Once we find out who paid these people the whole story will become clear,” the account wrote. That tweet amassed more than 9,000 retweets and more than 14,000 likes before Twitter removed it.

The “WANTED” post spread across Twitter, Facebook and TikTok. A Facebook group called “Celebrities for Trump” shared it. “We need more if [sic] these,” the post said, referring to the WANTED sign. “Keep your eyes open. Report them all it is a crime.”

Several days after the “WANTED” flyer surfaced and reached a large audience, the Gwinnett County sheriff stated that the post was “false.” Yet despite the post impersonating a law-enforcement agency, social-media companies have been slow to remove it.

While Twitter removed dozens of posts with the “WANTED” sign, ProPublica was able to find instances of it still on the platform.

Disinformation researchers tell ProPublica that they also identified posts accusing people of being ballot mules in other states with laws that restrict third parties from submitting people’s ballots. “Mule right here in PA,” one TikTok post read. “Make this Upper Dublin resident famous #2000Mules #2000MulesDocumentary #2000MulesTheMovie.”

In Arizona, a Republican state senator named Kelly Townsend has encouraged people to camp out at ballot drop boxes and write down license plate numbers of people deemed to be suspicious. “I have been so pleased to hear of all you vigilantes that want to camp out at these drop boxes,” Townsend recently said. “So, do it. Do it.”

Even if “2000 Mules” were accurate — which experts stress it almost certainly is not — the ballot trafficking theory put forward by the film would not change the result of any election. Rick Hasen, a professor and election-law expert at the University of California, Irvine, says he believes the rigged-election message in “2000 Mules” is just the latest attempt to more broadly lay the groundwork for challenging and overturning the outcome of a future election.

“If you believe the last election was stolen, you’re going to be more likely to take steps to steal the next one back,” Hasen said. “It’s pretty obvious that what’s going on here is using false claims of fraud as a potential pretext to engage in election subversion in 2024 or another future election. That’s very dangerous for American democracy.”

Do you have information about election disinformation, voter suppression or other threats to democracy? We want to hear from you. Fill out our [questionnaire](#) or contact reporter Andy Kroll directly at andy.kroll@propublica.org or via [Signal](#) or [WhatsApp](#) at 202-215-6203.

Filed under —
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Andy Kroll

Andy Kroll is a ProPublica reporter covering voting, elections and other democracy issues.

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Exhibit F

Democracy Challenged: A Look at the Historic Test on Democratic Norms >

Hunting for Voter Fraud, Conspiracy Theorists Organize ‘Stakeouts’

A nascent effort to surveil drop boxes for potential fraud is taking shape in at least 10 states, worrying election officials and law enforcement.



By Tiffany Hsu and Stuart A. Thompson

Aug. 10, 2022

One night last month, on the recommendation of a man known online as Captain K, a small group gathered in an Arizona parking lot and waited in folding chairs, hoping to catch the people they believed were trying to destroy American democracy by submitting fake early voting ballots.

Captain K — which is what Seth Keshel, a former U.S. Army intelligence officer who espouses voting fraud conspiracy theories, calls himself — had set the plan in motion. In July, as states like Arizona were preparing for their primary elections, he posted a proposal on the messaging app Telegram: “All-night patriot tailgate parties for EVERY DROP BOX IN AMERICA.” The post received more than 70,000 views.

Similar calls were galvanizing people in at least nine other states, signaling the latest outgrowth from rampant election fraud conspiracy theories coursing through the Republican Party.

In the nearly two years since former President Donald J. Trump catapulted false claims of widespread voter fraud from the political fringes to the conservative mainstream, a constellation of his supporters have drifted from one theory to another in a frantic but unsuccessful search for evidence.

Many are now focused on ballot drop boxes — where people can deposit their votes into secure and locked containers — under the unfounded belief that mysterious operatives, or so-called ballot mules, are stuffing them with fake ballots or otherwise tampering with them. And they are recruiting observers to monitor countless drop boxes across the country, tapping the millions of Americans who have been swayed by bogus election claims.

In most cases, organizing efforts are nascent, with supporters posting unconfirmed plans to watch local drop boxes. But some small-scale “stakeouts” have been advertised using Craigslist, Telegram, Twitter, Gab and Truth Social, the social media platform backed by Mr. Trump. Several websites dedicated to the cause went online this year, including at least one meant to coordinate volunteers.

Some high-profile politicians have embraced the idea. Kari Lake, the Trump-endorsed Republican candidate for governor in Arizona, asked followers on Twitter whether they would “be willing to take a shift watching a drop box to catch potential Ballot Mules.”

Supporters have compared the events to harmless neighborhood watches or tailgate parties fueled by pizza and beer. But some online commenters discussed bringing AR-15s and other firearms, and have voiced their desire to make citizens’ arrests and log license plates. That has set off concerns among election officials and law enforcement that what supporters describe as legal patriotic oversight could easily slip into illegal voter intimidation, privacy violations, electioneering or confrontations.

“What we’re going to be dealing with in 2022 is more of a citizen corps of conspiracists that have already decided that there’s a problem and are now looking for evidence, or at least something they can twist into evidence, and use that to undermine confidence in results they don’t like,” said Matthew Weil, the executive director of the Elections Project at the Bipartisan Policy Center. “When your entire premise is that there are problems, every issue looks like a problem, especially if you have no idea what you’re looking at.”



Screenshot from Truth Social

Mr. Keshel, whose post as Captain K inspired the Arizona gathering, said in an interview that monitoring drop boxes could catch illegal “ballot harvesting,” or voters depositing ballots for other people. The practice is legal in some states, like California, but is mostly illegal in battlegrounds like Georgia and Arizona. There is no evidence that widespread illegal ballot harvesting occurred in the 2020 presidential election.

“In order to quality-control a process that is ripe for cheating, I suppose there’s no way other than monitoring,” Mr. Keshel said. “In fact, they have monitoring at polling stations when you go up, so I don’t see the difference.”

The legality of monitoring the boxes is hazy, Mr. Weil said. Laws governing supervision of polling places — such as whether watchers may document voters entering or exiting — differ across states and have mostly not been adapted to ballot boxes.

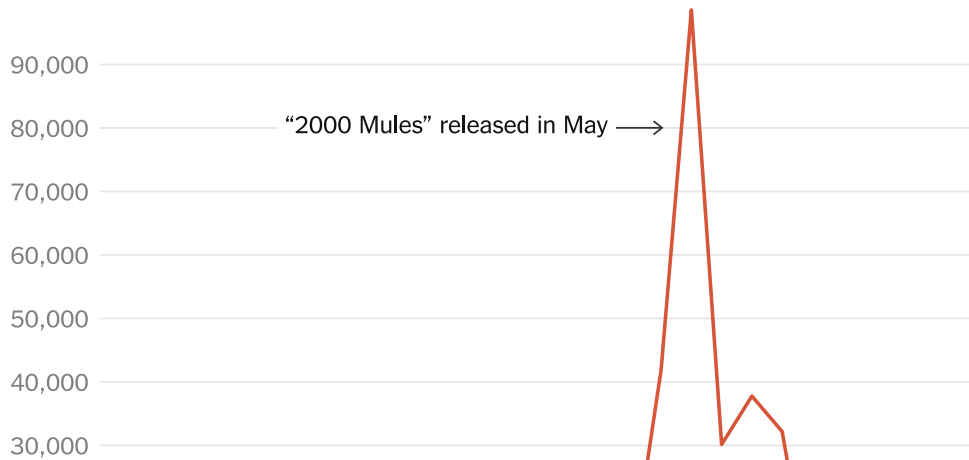
In 2020, election officials embraced ballot boxes as a legal solution to socially distanced voting during the coronavirus pandemic. All but 10 states allowed them.

But many conservatives have argued that the boxes enable election fraud. The talk has been egged on by “2000 Mules,” a documentary by the conservative commentator Dinesh D’Souza, which uses leaps of logic and dubious evidence to claim that an army of partisan “mules” traveled between ballot boxes and stuffed them with fraudulent votes. The documentary proved popular on the Republican campaign trail and among right-wing commentators, who were eager for novel ways to keep doubts about the 2020 election alive.

“Ballot mules” have quickly become a central character in false stories about the 2020 election. Between November 2020 and the first reference to “2000 Mules” on Twitter in January 2022, the term “ballot mules” came up only 329 times, according to data from Zignal Labs. Since then, the term has surfaced 326,000 times on Twitter, 63 percent of the time alongside discussion of the documentary. Salem Media Group, the executive producer of the documentary, claimed in May that the film had earned more than \$10 million.

Mentions of "ballot mules" surged in May after the debunked documentary "2000 Mules" claimed that an army of operatives stuffed ballot boxes during the 2020 election.

Digital mentions of "ballot mules" per week



Note: Includes mentions on digital platforms including social media, broadcast, traditional media, and other online sites. Source: Signal Labs • By The New York Times

The push for civilian oversight of ballot boxes has gained traction at the same time as legislative efforts to boost surveillance of drop-off sites. A state law passed this year in Utah requires 24-hour video surveillance to be installed at all unattended ballot boxes, an often challenging undertaking that has cost taxpayers in one county hundreds of thousands of dollars. County commissioners in Douglas County in Nebraska, which includes Omaha, voted in June to allocate \$130,000 for drop box cameras to supplement existing cameras that the county does not own.

In June, Arizona lawmakers approved a budget that included \$500,000 for a pilot program for ballot box monitoring. The 16 boxes included will have round-the-clock photo and video surveillance, rejecting ballots if the cameras are nonfunctional, and will accept only a single ballot at a time, producing receipts for each ballot submitted.

Many supporters of the stakeouts have argued that drop boxes should be banned entirely. Some have posted video tours of drop box sites, claiming that cameras are pointed in the wrong direction or that the locations cannot be properly secured.

Melody Jennings, a minister and counselor who founded the right-wing group Clean Elections USA, claimed credit for the Arizona gathering on Truth Social and said it was the group's "first run." She said in a podcast interview that any surveillance teams she organized would try to record all voters who used drop boxes. The primaries, she said, were a "dry run" for the midterms in November. Ms. Jennings did not respond to requests for comment.

After the Arizona gathering, organizers wrote to high-profile Truth Social users, including Mr. Trump, claiming without evidence that "mules came to the site, saw the party and left without dropping ballots." Comments on other social media posts about the event noted that the group could have frightened away voters wary of engaging, drawn people planning to report the group's activities or simply witnessed lost passers-by.

On Aug. 2, Ms. Lake and several other election deniers prevailed in their primary races in Arizona, where a GoFundMe campaign sought donations for "a statewide volunteer citizen presence on location 24 hours a day at each public voting drop box location." Kelly Townsend, a Republican state senator, said during a legislative

“I have been so pleased to hear about all you vigilantes out there that want to camp out at these drop boxes,” Ms. Townsend said.

Surveillance plans are also forming in other states. Audit the Vote Hawaii posted that citizens there were “pulling together watch teams” to monitor the drop boxes. A similar group in Pennsylvania, Audit the Vote PA, posted on social media that they should do the same.

In Michigan, a shaky video filmed from inside a car and posted on Truth Social showed what appeared to be a man collecting ballots from a drop box. It ended with a close-up shot of a truck’s license plate.

In Washington, a right-wing group launched Drop Box Watch, a scheduling service helping people organize stakeouts, encouraging them to take photos or videos of any “anomalies.” The group’s website said all its volunteer slots for the state’s primary early this month were filled.

The sheriff’s office in King County, Wash., which includes Seattle, is investigating after election signs popped up at several drop box sites in the state warning voters they were “under surveillance.”

One Gab user with more than 2,000 followers offered stakeout tips on the social network and on Rumble: “Get their face clearly on camera, we don’t want no fuzzy Bigfoot film,” he said in a video, with his own face covered by a helmet, goggles and cloth. “We need to put that in the Gab group, so there’s a constant log of what’s going on.”

Calls for civilian surveillance have expanded beyond ballot boxes. One post on a conservative blog cheers on people who monitor “any suspect activities before, during and after elections” at ballot-printing companies, vote tabulation centers and candidates’ offices.

Paul Gronke, the director of the Elections and Voting Information Center at Reed College, suggested that activists hoping for improved election security should push for more data transparency measures and tracking programs that allow voters to monitor the status of their absentee ballot. He said he had never heard of a legitimate example of dropbox watchdogs successfully catching fraud.

The prospect of confrontations involving self-appointed overseers largely untrained in state-specific election procedures, charged up by a steady diet of misinformation and militarized rhetoric, is “just a recipe for disaster” and “puts at risk the voters’ ability to cast their ballots,” Mr. Gronke said.

“There are ways to secure the system, but having vigilantes standing around drop boxes is not the way to do it,” he said. “Drop boxes are not a concern — it’s just a misdirection of energy.”

Cecilia Kang contributed reporting.

Exhibit G



[Home](#) | [Media](#) | [Calendar](#) | [YCPT](#)

Operation: Drop Box



This Ballot Dropbox Is Under Surveillance

Accepting compensation for harvesting or depositing ballots may be a violation of Federal Law
(52 U.S. Code § 20511; 18 U.S. Code § 594)

Please report suspicious activity

Operation: Drop Box

In our endeavor to secure our election from those who would cause this country harm, we have created Operation: Drop Box. For the upcoming election, we plan on watching the ballot boxes throughout Yavapai County.

We are asking for patriots to take a two hour shift to watch election drop boxes,
and stop the ballot box stuffing!

Case 3:22-cv-08196-MTL Document 11-10 Filed 10/28/22 Page 49 of 122
We need coordinators for every one of the 19 boxes, and patriots to fill shifts for every day, for 27 open voting days!

Yes, it's a big job, and it can't be done without YOU! Sign up today.

If you can take more than one shift during the 27 days, that would be awesome!

Signup form for Operation: Drop Box.

Name *

First

Last

Email *

Phone *

Address *

Address Line 1

Address Line 2

City

State

Zip Code

Day and time you can watch

Location you can Watch *

Volunteer to be Town lead? *

- Yes
 No

Comments

Submit

We are going to be doing two-hour shifts at each drop box location with a minimum of two people at a time.

Bring a phone or a camera.

If you see someone putting more ballots in than their own, take a picture of them, their car, and their license plate.

Do NOT engage. Contact us and we'll get in touch with Sheriff Rhodes who is already aware of what we are doing and will do what he can.

[Click Here for the](#)



Drop Box Locations

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Website Design by Virtual Property Developer



Exhibit H

e-Edition

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Ballot ‘drop watch’ won’t intimidate voters, says ‘Lion’



The board of the Lions of Liberty group. (Photo courtesy of Lions of Liberty)



By Vyto Starinkas

Originally Published: October 5, 2022 8:46 a.m.

Tweet



VERDE VALLEY – The Lions of Liberty group won't be intimidating voters when their volunteers are watching voters dropping ballots into Yavapai County drop boxes, including those in the Verde Valley, from Oct. 12 to the General Election, according to member Luke Cilano.

Even though Lions of Liberty are linked to sister groups like the Oath Keepers and the Yavapai County Preparedness Group, Cilano said they are not part of any national group.

"We started this here locally" in November of last year, he said.

The conservative group is based in Prescott, and members come from Chino, Prescott Valley, Dewey, and several from the Cottonwood side of the mountain. He said they have 250 people on their email list, a web page and hold meetings at the Prescott Vibe Event Center.

The Yavapai County Sheriff's Office is aware of the group's plan to "box watch" voters at drop boxes outside polling places during the upcoming election and he said it's legal as long they stay 75 feet away and don't intimidate people.

Cilano said ballot harvesting has been a problem in other parts of the country. He didn't know if it was in Yavapai County, but they decided "we're going to sit and we're going to watch the drop boxes."

He believed another group was going on "ballot watch" in Maricopa County.

The Lions of Liberty volunteers will stand away from ballot boxes, observe and take a photo if they observe anything, he said.

They want to be in a position to see who is coming to the ballot box and how many ballots they are putting in there.

"If they are putting more ballots in there, we can take photo evidence and take to the sheriff," Cilano continued. The only time they will take a photo is if they see anything amiss.

"I expect him to do his job," if they turn over evidence to the sheriff, Cilano said. It is illegal in Arizona to put more than one ballot in the box other than your own, he pointed out.

That is not strictly true. State law does not limit how many secured ballots a person may drop off at a drop box for others as long as those "others" are their family members, other members of their household, or people for whom they are providing care.

On its webpage, the group was looking for volunteers to be in county towns with voting boxes, including Cottonwood, Camp Verde, Clarkdale, Jerome and VOC. Case 3:22-cv-08196-MTL Document 11-10 Filed 10/28/22 Page 55 of 122

Cilano said they are not arresting anyone, they are not engaging anyone and not getting in anyone's way, but they are observing from a distance. If anyone engages them, he has given strict orders for his volunteers to leave immediately and call local law enforcement.

"We're not interested in altercations at all."

Asked if the Lions of Liberty volunteers will be noticed, Cilano said he thought so since he has gotten death threats already.

Sign up for our e-News Alerts

Exhibit I

VICE News

Armed Fringe Groups Are Gearing Up to 'Protect' Midterm Ballot Dropboxes

The groups, inspired by conspiracy theories and the Big Lie about the 2020 election, could deter some voters, experts warn.

TO By [Tess Owen](#)

October 6, 2022, 10:07am



SCREENSHOT OF A YCPT MEETING IN AUGUST LED BY JIM ARROYO, FORMER

ties to extremists, galvanized by conspiracy theories, are seeking to take matters into their own hands this election season.

Ballot dropboxes have become the central focus of election fraud conspiracy theorists, thanks to the debunked documentary *2,000 Mules*, by right-wing commentator Dinesh D'Souza.

That film claims that a shadowy network of hired “mules” in contested states were hired by nonprofits as part of a giant ballot trafficking operation to stuff dropboxes with fake absentee ballots, all with the goal of stealing the 2020 election from Donald Trump. The film was released in May, six months before the midterms, reinvigorated the “Stop the Steal” movement and inspired vigilante efforts around the country—in some cases spearheaded by innocuous-sounding groups that obscure the known ideologues and extremists behind them.

Lions of Liberty is the “political arm” of a newly-formed nonprofit called Yavapai County Preparedness Team (YCPT), led by the former vice president of Arizona’s Oath Keeper chapter, Jim Arroyo. At a meeting in August that was posted to YouTube, Arroyo explained that they had turned the Oath Keeper chapter into a corporate nonprofit under the name of YCPT, which in turn gave them the ability to get a bank account.

In an email to VICE News, Arroyo said that the Arizona chapter officially broke ties with the national leadership of the notorious militia group after it was implicated in the violent riot at the Capitol on Jan. 6. (Five members are currently standing trial for seditious conspiracy charges, including the group’s leader Stewart Rhodes. Prosecutors allege that Rhodes and his cohort plotted an “armed rebellion to shatter a bedrock of American democracy.”) However, they had been operating more or less independently from the national organization for about four years, said Arroyo; Rhodes broke ties with the Arizona contingent after they declined to assist in armed vigilante activities at the border, out of respect for Border Patrol.

particularly concerned about the period between midnight and 6 a.m. “If you saw the movie *2,000 Mules*” he said, that timeframe was “when the bulk of the problems happen, that’s when we will be on scene with a camera and flashlight.” Arroyo told VICE News that some volunteers might be armed. “This is Arizona; almost everyone is armed, all the time,” he said. “That's not a big deal here.”

**Do Look
Damning**

GREG WALTERS

10.05.22

Arroyo said he will likely pick up a couple of shifts to monitor dropboxes.

In the August meeting, Arroyo assured members of the crowd that they’d be welcome to continue wearing their Oath Keepers merch, even while conducting ballot dropbox surveillance. “Your shirts and hats are what tell the world you’re not ashamed to be an Oath Keeper, or afraid of the government just because of that crap that happened on January the 6th, which was completely staged. It was a setup,” Arroyo said, before acknowledging, “Yeah, they did something stupid beyond all belief.”

During the meeting, Arroyo also stoked fears of an imminent civil war. “This is not the same as (Black Lives Matter) and George Floyd or antifa. This is a direct confrontation with the federal government,” he said. “This is now the federal government of the United States of America in direct conflict with its own citizenry.”

The Lions of Liberty describe themselves as a “resolute nucleus of concerned, passionate conservative patriots who are determined to correct the course for our country which has been hijacked and undermined by global elites, communists, leftists, deep state bureaucrats, and fake news.” Their goal? “To bring God back to our leadership and win this spiritual battle for the soul of our nation.”

The Lions of Liberty aren’t the only ones calling for and coordinating vigilante activity around the midterm elections.

“The threat of groups of far-right vigilantes, some potentially armed, fueled by Big Lie misinformation, lurking near ballot dropboxes, could potentially deter some from casting their votes,” warned Burghart. “The possibility of conflict in such a scenario is real.”

Burghart added that “dropbox vigilantism” perpetuates unsubstantiated claims of rampant voter fraud that “keep the Big Lie alive and further erodes confidence in elections and democracy.”

Former Washington state Rep. Matt Shea runs On Fire Ministries, an apocalyptic Christian nationalist church in Spokane, and has been leading “training sessions” for prospective volunteers to monitor dropboxes.

“We are doing something for the community. How many of you watched *2,000 Mules*? Raise your hands,” said Shea during a service in September. “I think it would be good if we had some folks who were certified, trained, dropbox observers, in Spokane County.” The training took place on Sept. 30.

Shea is a particularly controversial character; a 2019 investigation by the Washington Legislature concluded that he’d “participated in an act of domestic terrorism” for his involvement in three armed conflicts against the federal government between 2014 and 2016, including the Bundys’ armed standoffs in Nevada and Oregon and an armed conflict with the U.S. Veterans Affairs Department in Priest River, Idaho.

And a group called True the Vote, which was involved in the *2,000 Mules* documentary, is also teaming up with the Constitutional Sheriffs and Peace Officers Association (CSPOA) to monitor dropboxes nationwide. CSPOA is headed by Richard Mack, who has long-standing ties to the militia movement, including to the Oath Keepers.

“The plan from national Big Lie groups, like True the Vote, is to use those “voter fraud” claims to get sympathetic sheriffs to intervene in elections,” said Burghart.

referencing QAnon posted a photo of their party to Trump's platform Truth Social, and credited Seth Keshel, a former U.S. Army intelligence officer and conspiracy theorist, for the idea.





SCREENSHOT FROM THE APP TRUTHSOCIAL SHOWING A "DROPBOX TAILGATE PARTY"

Brian Cates, a columnist for the fringe-right publication *The Epoch Times*, has long been a proponent of the “Big Lie” and has been riling up his more than 120,000 followers on Telegram around the idea of taking matters into their own hands this election season.

“The time for calling for people to just show up to vote is long past. We’re moving into another completely different era,” he wrote. “Citizens will be given the tools to monitor all the dropboxes and engage in massive real-time information operations in order to bring about election integrity.”

“Forewarned is forearmed,” he added. “An army of patriots is going to force compliance with the election laws in their states before these next elections are held.”

One of the primary examples of “evidence” of nefarious activity offered by 2,000 *Mules* was surveillance videos that appeared to show individuals posting multiple ballots into a dropbox, including in Georgia. Submitting multiple ballots on behalf of other people is known as “ballot harvesting,” and it is legal in several states, including Georgia.

However, the fact that submitting multiple ballots has been presented as a telltale sign of election fraud lays the groundwork for possible confrontations between dropbox “monitors” and people who are acting entirely within the law. (Right-wing political commentator Monica Matthews, from Clear Talk Media, even tried to remind her followers of this fact. “Before you all plan Dropbox tailgate parties to monitor the integrity of your elections—MAKE SURE you check your new state laws. Some states allow harvesting,” she wrote on Twitter in August. “Confronting people at dropboxes could land you in jail.”)

in Washington to drop off multiple ballots at once on behalf of family members.

The signs also had a QR code that allowed passersby to report “suspicious activity” to the King County Republican Party (whose chair disavowed the vigilante activity). Amber Krabach, a GOP activist, QAnon conspiracy theorist and member of the Kings County Republicans’ “Election integrity Committee”, was behind the signs. The county elections office asked the sheriff’s department to investigate whether Krabach had broken a state law barring civilians from influencing someone’s vote within 25 feet of a ballot dropbox. They didn’t press charges, but they did refer the matter to the FBI.

All these vigilante efforts are taking place against a backdrop of increasingly incendiary rhetoric from GOP figures and far-right forums alike, about what will happen if they get even so much of a whiff of “voter fraud” this election season.

“If our election systems continue to be rigged and continue to be stolen, then it’s going to lead to one place—and it’s bloodshed,” said ex-Congressman Madison Cawthorn at a GOP event in North Carolina this summer.

On Patriots.win, a pro-Trump forum, some have discussed the need to bring guns to monitor dropboxes. Someone shared an article from the right-wing Gateway Pundit claiming they’d found evidence of massive voter fraud in Detroit during the 2020 election. “We need people waiting for that shit this time and take that shit at gun point,” someone responded. “Use walkie-talkies and don’t park anywhere near there or use fake plates and a vehicle wrap.”

Others, like Arroyo from YCPT, have stoked fears of an imminent civil war instigated by the Democrats. “Keep your powder dry until after the midterms,” one person wrote. “No matter what, they are going to try like hell to provoke a civil war before then.”

“Hold the line till Nov... then do whatever the fuck you gotta do,” another user on patriots.win wrote.

TAGGED: [ELECTIONS](#), [OATH KEEPERS](#), [VIGILANTISM](#), [BREAKING THE VOTE](#), [THE EXTREMISM DESK](#), [DROPBOXES](#), [TRUE THE VOTE](#), [2,000 MULES](#)

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Exhibit J

Why, CPT?: Arizona Oath Keepers as a microcosm for the movement

This piece is an analysis of the YCPT's views, connections, and influence. Much of this piece is based on over fifty hours of footage drawn from 23 YCPT meetings and 9 trainings, 4 "COVID check-ins", and an assortment of interviews or podcasts involving the group's leader, Jim Arroyo.

By [admin < https://militia.watch/author/hstall/>](https://militia.watch/author/hstall/)

June 28, 2021 < <https://militia.watch/read/ycpt-az-ok/>>



• • •

After the storming of the US Capitol Building on 6 January 2021, media has been trying to figure out who the Oath Keepers are. 60 Minutes, 3 months after the riot, [interviewed < https://www.youtube.com/watch?v=32h3Ua4nksg >](https://www.youtube.com/watch?v=32h3Ua4nksg) 4

[minutes-capitol-riots-oath-keepers-militia-video-2021-06-20/](https://www.cbsnews.com/video/60-minutes-capitol-riots-oath-keepers-militia-video-2021-06-20/)> the segment, providing the group more airtime. These Oath Keepers were four members of a Prescott, Arizona area organization known as the Yavapai County Preparedness Team.

Who are the Yavapai County Preparedness Team (YCPT)? The YCPT is an Arizona Oath Keepers chapter, previously directly part of the Stewart Rhodes-led national organization but now autonomous and independent. They still, however, call themselves Oath Keepers and use Oath Keepers iconography and ideology to describe themselves. This article explores their structure, their relationships to the right, and where it looks like they are heading.

This is a very long article, so MilitiaWatch has prepared a first "TL;DR" (too long; didn't read) that hits at some of the core points from this investigation without the goose chases and too-in-the-weeds writing the MW audience might be accustomed to at this point. You can read that here:

TL;DR — Why, CPT?



This post is a summary meant to cover the in-depth work featured in the article here. Summary: The Yavapai County Preparedness Team (YCPT) is a former Oath Keepers affiliate based in Arizona. They are led by Jim Arroyo and his wife, Janet. The husband-wife duo incorporated the YCPT into a state-recognized non-profit in 2019 and ... Continue reading



YCPT Structure

Prior to the split with Rhodes, the Arizona Oath Keepers (as they were once known), partially rebranded as the Yavapai County Preparedness Team (YCPT). There are several reasons for why this happened, which will be covered below. Directly relevant to the structure of the YCPT was a growing disenchantment with an absent national organization. The YCPT's leader expressed this both to journalists and to his organization, saying that the relationship to the national organization was not worth the energy.

This does not mean that the YCPT has never had a relationship with the national organization running Stewart Rhodes' Oath Keepers. The YCPT's lead said during a meeting that the group's name is "Yavapai County Preparedness Team" in part due to a conversation with Rhodes, during which the YCPT lead got Rhodes' blessing to create a separate non-profit organization.

This non-profit entity, created under the Arizona group's name, was in fact incorporated in the state of Arizona as a "Community Service". Federally speaking, this places the YCPT's nonprofit under the "Disaster Preparedness and Relief Service" subcategory as part of the "Public Safety, Disaster Preparedness and Relief" category of organizations. In the articles of incorporation, the YCPT claims to be an organization without members. Below is the leading portion of the YCPT's articles of incorporation in the state of Arizona, detailing this:

Arizona Corporation Commission - RECEIVED: 1-22-2019
Arizona Corporation Commission - FILED: 1-19-2019

9901219CM01

ARTICLES OF INCORPORATION

NON-PROFIT CORPORATION

ENTITY INFORMATION

ENTITY NAME:	Yavapai County Preparedness Team
ENTITY ID:	1942413
ENTITY TYPE:	Domestic Nonprofit Corporation
EFFECTIVE DATE:	01/19/2019
CHARACTER OF BUSINESS:	Community Service
CORPORATION WILL HAVE MEMBERS:	NO
CORPORATION WILL NOT HAVE MEMBERS:	YES

As shown above, the articles to establish this 501(c)3 were filed at the start of 2019. The YCPT's organization brings in less than \$50,000 in annual revenue so its directors are only required to file a Form 990-N each fiscal year. Due to this setup, very little information about the organization, including its on-the-books revenues and spending, is made public. However, there is so far only a record of the group's 2019 filing. This could be due to lags in processing on behalf of the state, given that the organization is still recognized as in good standing with the Arizona Corporation Commission.

The YCPT is led by James 'Jim' Arroyo and his wife Janet, who both reside in Chino Valley, Arizona. Jim was previously the vice president of the Arizona Oath Keepers and is currently the Director, Incorporator, and President of the YCPT. Janet is the Secretary of the YCPT and handles the group's correspondence, note-keeping, and most of their social media.

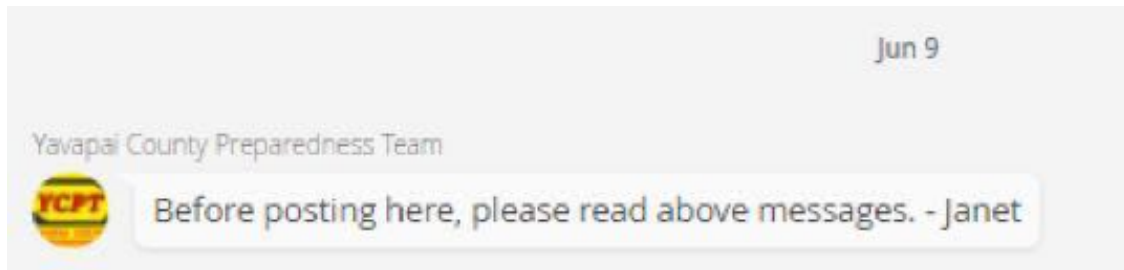


Jim works as a gunsmith at Mazy's, a pro-police gun store located in Chino Valley.

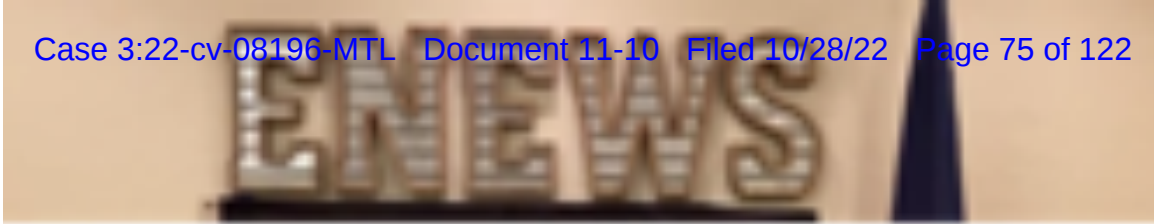
In March 2020, as COVID-19 restrictions began to be put in place throughout the US, Jim detailed on a podcast the "panic buying" happening at his store, describing the sales as "unbelievable", adding that "probably 25-30%" of buyers were first-time gun buyers.

Janet Arroyo, Jim's wife, acts as the group's secretary and takes a backseat when compared to Jim in the YCPT meeting structure. Janet, however, does handle a lot of the group's social media presence. She often signs her engagement on behalf of the YCPT account with her name:

Photo of Jim Arroyo from the Military Phonies site, where they **debunk** < <https://militaryphony.com/2018/12/27/james-arroyo-us-army-ranger-part-of-operation-eagle-claw-blog-of-shame/> > his claimed involvement in Iran hostage rescue op, "Operation Eagle Claw"



The Yavapai County Preparedness Team has created numerous sub-teams within their ranks. One of the more important ones is the Neighborhood Preparedness Groups (NPGs), which operate simultaneously as neighborhood watch and would-be militias. Gary Harworth runs the NPG program. Here is YCPT lead Arroyo and YCPT NPG lead Harworth explaining the NPGs at the Prescott E-News filming desk (more on the E-News later):



Screencap of transmission for Prescott E-News featuring Jim Arroyo and Gary Harworth

Harworth, like Jim, was one of those who appeared in the 60 Minutes piece on the YCPT (originally airing in April 2021, but reairing in June). He notably said during the interview that “when things get a little chaos-y around you, you have to be able to take care of yourself, defend yourself, protect your family [and] those you love—that’s part of the Constitution”, seemingly indicating towards his primary function within the Arizona Oath Keepers milieu and what drives him: self-defense and the notion of protecting one’s loved ones.

• • •

On the NPGs

Gary Harworth’s Neighborhood Preparedness Groups (NPGs) have a lot of related text and video on the group’s website, including this amazing intro page, perhaps hinting at their target client:

One of the most important functions of the NPGs, according to meeting footage recorded by the YCPT, is to react and response to BLM and 'Antifa' in NPG-controlled areas. This involves linked communications channels that are connected to a Quick Reaction Force (QRF) that is ready to show up armed to stand off against these perceived adversaries. This should sound fairly familiar to those who have been tracking both Oath Keepers movements specifically or militia units more broadly – the NPG in a lot of ways takes on the specific roles of a militia unit that the YCPT claims to have moved beyond.

Within this reaction paradigm, YCPT NPG members are expected to gather 'intel' on the situation to which they seek to respond. Jim lays out in a video but also in YCPT NPG handouts a system for documenting the highest quality data on the 'units' they are tracking. Below is the "SALUTE Report" format:

SALUTE Report

S.) Size – Number of troops, vehicles, aircraft

A.) Activity – “What are they doing?” Direction of travel.

L.) Location – Grid coordinates, mile markers, cross streets, landmarks.

U.) Unit / Uniform – Describe best as possible.

T.) Time and Date – Absolutely vital!

E.) Equipment – Accessories on aircraft, weapons, what is being towed by vehicles, etc.

ATTACH PHOTOS IF POSSIBLE

Sent to: Name _____
email _____
Phone _____

YCPT SALUTE Report form, acquired from YCPT internal files

Right off the bat, the reader will note that the ‘S’ in SALUTE stands for size, which is specified as “number of **troops**“, pointing to the perception of adversaries as military gatherings. That “aircraft” are also listed in this element of the reconnaissance report speaks to potentially broader targets, e.g. modern military units, as well. This is then repeated once more under ‘E’ for equipment.

The NPGs, as described above and elsewhere on the YCPT online ecosystem, also seek to build out a robust ‘intel’ infrastructure. This set-up is partially based

1. Gaining subject matter expertise
2. Removing bias from our thinking
3. Arriving at accurate conclusions

It’s unclear how rigorously either of these are followed within NPG units, but the overall YCPT structure speaks to major failures to adhere to these baselines. Take, for example, this 15 October post by the YCPT mods, which shares a pdf of the “Antifa Manual”:



When asked about the manual’s source, the moderator replies that “A member said they found it left behind”, though the YCPT has yet to have engaged with antifascists in the street and the file is a series of screenshots of a supposed manual “Dropped in Eugene on May 29, 2020 during a Riot.”, first page reproduced below:



The ‘manual’ is an obvious hoax, and a **[simple web search < https://www.google.com/search?q=the+antifa+manual>](https://www.google.com/search?q=the+antifa+manual)** of “the antifa manual” turns up as a first result a **[page < https://www.adl.org/disinformation-antifa-manual>](https://www.adl.org/disinformation-antifa-manual)** from the Anti-Defamation League (ADL) titled “Disinformation: Antifa manual”. This page by the ADL links to 2017 Snopes **[debunking < https://www.snopes.com/fact-check/antifa-manual-online/>](https://www.snopes.com/fact-check/antifa-manual-online/)** of the false document and pointing to the first poster of the document as an August 2017 Imgur upload by a literal Nazi. The ADL also specifically discusses the iteration of the document that includes the Eugene riot leading line as a widely circulated disinformation document during the summer of 2020. The **[riot <](#)**

Uncovering the non-validity of this document took MW less than 15 seconds to search on Google, without using any fancy OSINT tricks. If the YCPT mods are unable to do this, how can they claim that NPGs follow an intelligence doctrine that isn't equally as flawed, biased, and inaccurate?

The NPGs fit into a larger prepping hierarchy, which moves from most discrete to most broad in this order:

- Individual preparedness
- Family preparedness
- NPGs
- Community Preparedness Teams (CPT)

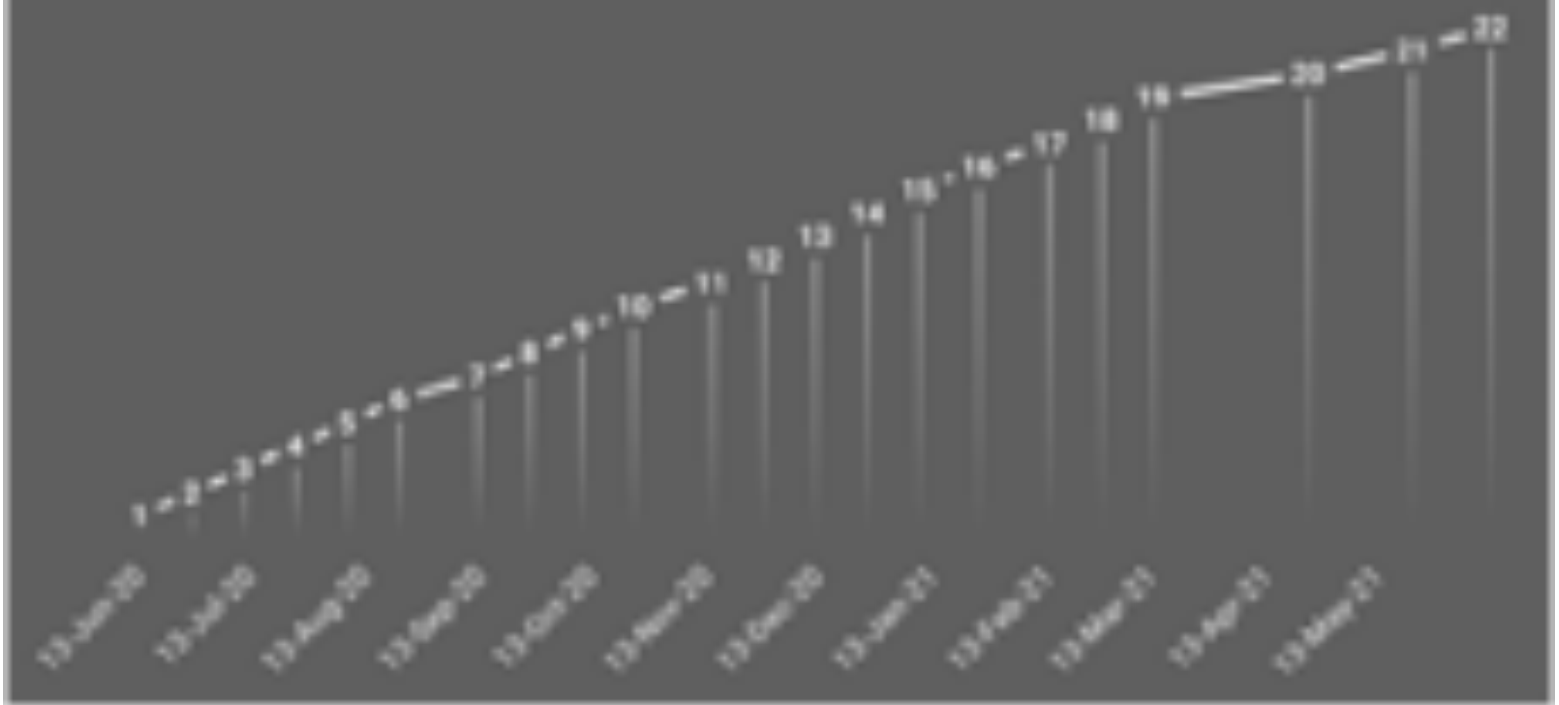
All of these levels include staples of prepper lists, everything from water to comms channels to weapons (described on their sites as “Firearms for every adult, capable teenaged children” and “One rifle, one pistol, in common calibers only. Preferably on AR platform for magazine interchangeability. Pistols are a personal choice”). Other equipment for these teams include such items as “palm pilots”, “night vision”, “tactical clothing”, and “good socks”.

The Community Preparedness Teams (CPT) is the superstructure by which the YCPT operates, which is something they are now pushing at a greater scale. This will be covered more in-depth later, but first, some notes on the group's events schedule.

Schedule

The YCPT keeps a fairly regular schedule, usually meeting every other Saturday for a two- to four-hour-long meeting led by Jim Arroyo in Prescott, Arizona. These meetings cover a range of topics (many of them well-tread by now) and are all recorded by the YCPT team, who then upload the recordings on their media channels.

To show how regular these meetings usually are, here is a graph of each of the 22 meetings the YCPT has posted online, alongside the meeting's date:



The chart of these meeting dates is fairly evenly spread, with only a few jolts in the YCPT's biweekly schedule. It appears that despite many people opting to avoid group meetings during the summer and fall of 2020 due to the virus's spread, the YCPT actually launched their recorded group meetings at that time.

*Note: there is *technically* a 26 October 2019 YCPT meeting that was recorded and uploaded to YCPT media channels, but it is a major outlier on the graph.*

These meetings cover a range of topics, but mostly repeat a lot of the same material. Looking at the content of these 22 meetings, 100% of the meetings discuss guns or firearms explicitly. All but one meeting discuss the topics of 'Antifa', Donald Trump, and civil war. Civil war seems to be a constant feature of these meetings, and the one meeting not to discuss civil war was the group's meeting right after the 2020 election, which did discuss civil unrest and violence though not civil war specifically. Democrats and Black Lives Matter were discussed by Jim Arroyo and his friends 90.0% and 86.4% of the time, respectively. Cumulative discussion of these topics are charted below, with lapses in mention portrayed as 0 on the y-axis to show gaps.

YCPT MENTIONS OF KEYWORDS

Cumulative number of videos mentioning the keywords “BLM”, “Antifa”, “Democrats”, “Trump”, “Guns/Firearms”, and “Civil War”, with no mention marked as 0 to show meetings not discussing them.

These meetings are occasionally also supplemented with additional training material or vlogs from Jim. The training material comes in the form of a lecture to a camera, covering topics such as home remedies, survival foods, or “neighborhood security”. These lectures usually are recorded and posted on off weekends, allowing for more YCPT content to be consumed on a near-weekly basis. The vlogs have mostly been in the form of a COVID-19 “check in” while Jim sips coffee from a YCPT-branded mug, usually 15-30 minutes.

During these vlogs, Jim provides his viewers with such insights as referring to the mid-April COVID-19 numbers as “wrong”, adding that “we are in the midst of a propaganda campaign the likes of which we’ve never seen”.

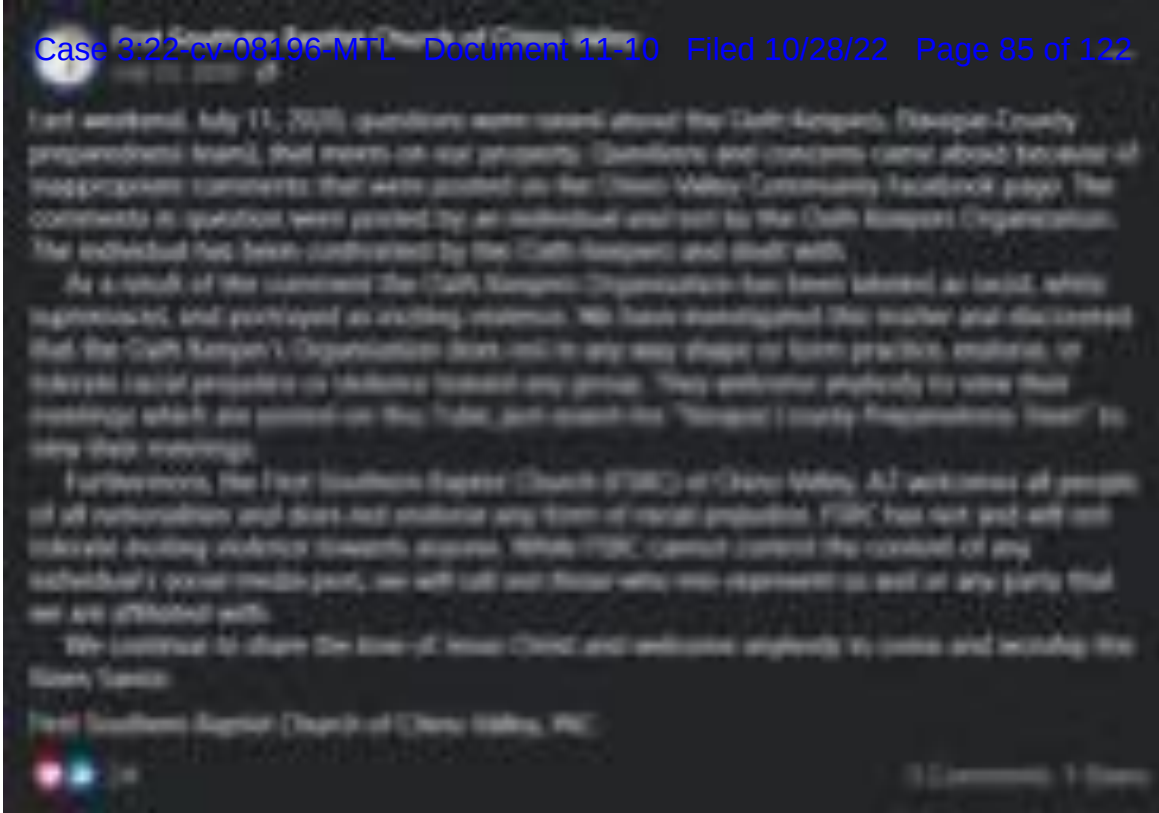
The content of these vlogs varies between political theorizing, claims against public health departments, and assorted prepper tips. In a May 2020 video, Jim discusses details on bleach for several minutes, interjecting advice on how to encourage friends and family to get into prepping between providing his views on the cleaning product.

Many of these vlogs are posted on YCPT media but recently have also found a home in the Prescott E-News media channels, citing Jim Arroyo as the writer/creator.



The group primarily meets at First Southern Baptist Church of Chino Valley. Here's how that was determined.

First, there's this post from the First Southern Baptist Church of Chino Valley (FSBCCV), which discusses an Oath Keepers member who made "inappropriate comments" in a Chino Valley community group. In the post, the FSBCCV details that the Yavapai Country Preparedness Team "meets on our property" in this 22 July 2020 post:



A Facebook post concerning the YCPT using their space ([live link < https://www.facebook.com/FSBCCV/posts/3330303420354521>](https://www.facebook.com/FSBCCV/posts/3330303420354521))

This location is corroborated as the core YCPT meeting place by a few other clues from the YCPT chatter Mewe. First, four months ago, the YCPT account posted that attendees could park at a Safeway and then drive to the church in one car:



There is, in fact, a Safeway just down the street from the First Southern Baptist Church (FSBC), accounting for about a 4 minute drive parking lot to parking lot:



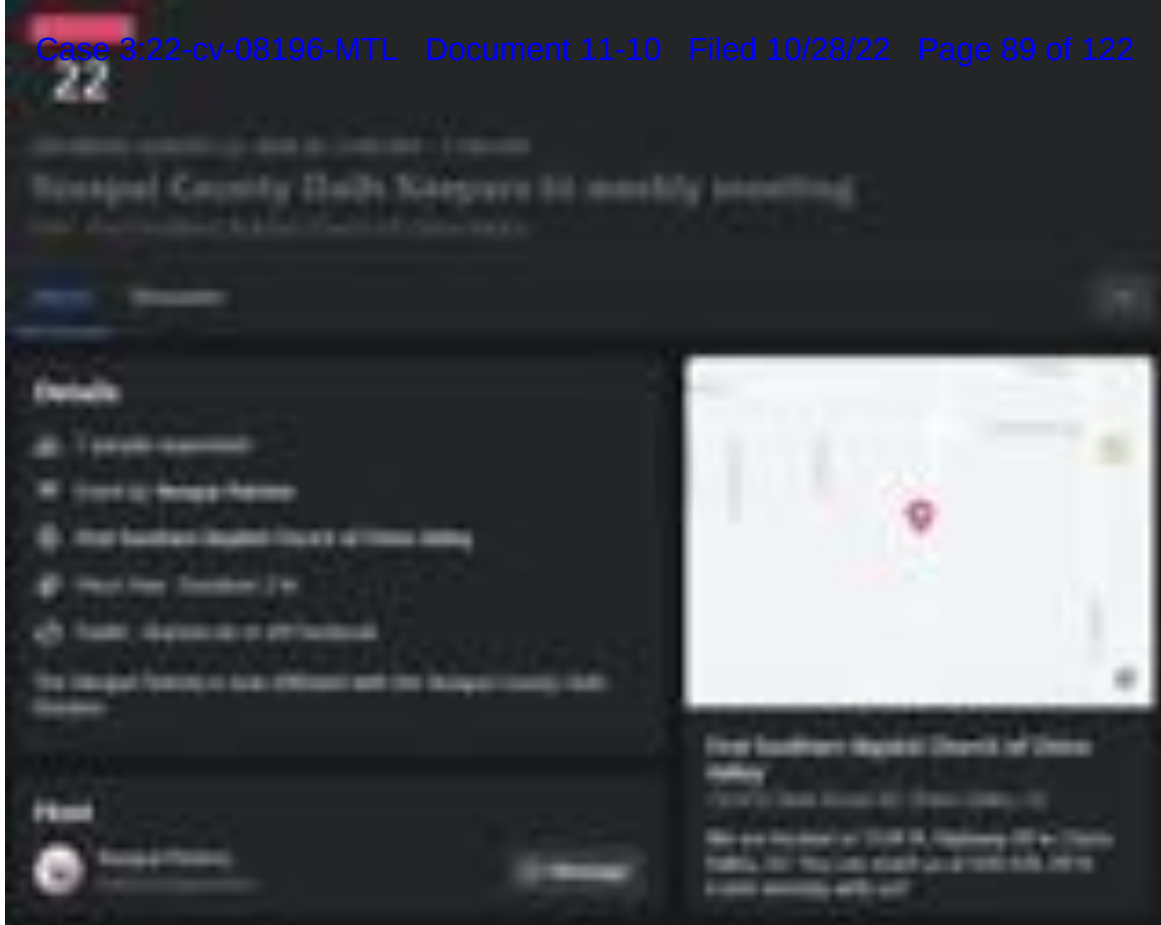
A month later, another post includes the address of the church as the meeting location, down to the specific building (“C”):



But more recently, here is a post for a *scheduled* training class on 21 June 2021 just before this article’s publication. The event lists the “First Southern Baptist Church in Chino Valley” as “where the OK/YCPT Meetings are held”:



Another late summer 2020 Facebook event for a “Yavapai County Oath Keepers bi weekly meeting” included the FSBCCV as a meeting location, hosted by an organization known as the “Yavapai Patriots”.



Old Facebook event, hosted by the Yavapai Patriots ([live link < https://www.facebook.com/events/first-southern-baptist-church-of-chino-valley/yavapai-county-oath-keepers-bi-weekly-meeting/1658559864306187/>](https://www.facebook.com/events/first-southern-baptist-church-of-chino-valley/yavapai-county-oath-keepers-bi-weekly-meeting/1658559864306187/))

The Yavapai Patriots are another important recent development to be discussed further below, too.

Oath Keepers relationship

The YCPT formed directly out of the national organization run by Oath Keepers founder Stewart Rhodes. In 2015, the YCPT even got a pat on the back from the national organization, who reposted a positive news article about Jim's organization on their site:



However, a recent fixture of YCPT media presence has been their continuing claim that they are no longer affiliated with the national Oath Keepers organization. Arroyo puts a timeline to this, saying in a recent meeting that he hasn't talked with Rhodes in "over two years". But it wasn't always this way, as Jim has discussed even in the last year and six months the process by which the YCPT's non-profit was created. Specifically, he summarizes a conversation that he and Rhodes allegedly had about forming the YCPT so that the group could apply for funding via grants federal and otherwise. The YCPT was incorporated in 2019 so Jim's "two years" statement is at least close to that timeline.

Though the YCPT may have broken up with Rhodes, they clearly haven't broken up with the idea of the Oath Keepers. Jim still wears OK gear, the group still maintains that they adhere to the 10 "Orders We Will Not Obey" outlined by Rhodes in 2009, and they still refer to their movement colloquially as Oath Keepers. They do this while simultaneously and fervently saying that the Oath Keepers are not a militia. This is in direct contradiction to the Oath Keepers founder's opinion of the movement, which both he and national Oath Keeper writers have defined as a "militia" in begging President Donald Trump to deputize the national organization for violence.

Ultimately, the definition of "militia" isn't as important as the notion that the Oath Keepers nationally and the YCPT's NPGs specifically, see themselves as armed arbiters of peace in direct opposition to movements to their left (from BLM to 'antifa' to the Democratic Party).

Connections to the GOP state apparatus

The Yavapai County Preparedness Team is quite well connected to their geographically-specific GOP state apparatus. At minimum in August 2020, November 2021, and March 2021, Arizona State Representative Quang Nguyen spoke at meetings for the organization. Nguyen said *just ahead of the contentious 2020 election* that not only was the Democratic Party the “Communist Party of America”, but that “the only good commie is a dead commie”, to thunderous applause. Quong is also the head of the Arizona State Rifle and Pistol Association and has used YCPT appearances to push for membership of the organization. Quong also identified himself in the March 2021 meeting that he “might be the only Oath Keeper down [in the Arizona Legislature]” alongside Wendy Rogers, for which he clarified “Yes. So one in the Senate, one in the House. And I’m not exactly real shy about it either.”

Wendy Rogers, an Arizona State Senator, has also boasted about her appearances at YCPT events, calling herself a member of the Oath Keepers on her Twitter page after attending an Arizona Oath Keepers meeting in Cottonwood. YCPT lead Jim Arroyo has also referred to Arizona State Representative Judy Burges as an ally of his movement, too.



Wendy Rogers speaking to a YCPT meeting, via her [Twitter < https://twitter.com/WendyRogersAZ/status/1368398965113257989 >](https://twitter.com/WendyRogersAZ/status/1368398965113257989)

YCPT meetings have been frequent campaign stops for would-be elected officials. In June 2020, US Senate candidate Daniel McCarthy described the current political moment of the day as “a literal war”, saying that “the United States is actually in the middle of a war right now... and that’s why you’re here.” Despite being a member of the Council for National Policy, McCarthy (a highly-moneyed conservative network which Anne Nelson [describes < https://www.bloomsbury.com/us/shadow-network-9781635573190/>](#) as a “pluto-theocracy”) lost the Republican primary 3:1 to Martha McSally, who in turn lost to Democrat Mark Kelly.

Selina Bliss, a GOP candidate for Arizona State Representative, spoke at a June 2020 YCPT meeting before she lost a primary to Quang Nguyen and Judy Burges, both of whom went on to win against the Democratic candidate, Judy Stahl, for the two open seats as part of the 2020 election.

GOP candidate Harry Oberg, now an elected member of the Yavapai County Board of Supervisors, attended a July 2020 meeting of the YCPT, too. He spoke just after Jim described “your House of Representatives [and] your US Senate” as the group’s “domestic enemies”.



July 2020 photo of Gosar posing with a man in a Proud Boys shirt while another man in an Oath Keepers stands nearby, in Prescott Square.

[Photo via Vaughn Hillyard < https://twitter.com/VaughnHillyard/status/1279484319312953344>](https://twitter.com/VaughnHillyard/status/1279484319312953344) .

One of the three current members of the Arizona Corporation Commission, Jim O’Connor, also spoke at the June 2020 YCPT event that Selina Bliss spoke at.

YCPT lead Jim Arroyo has also claimed that US Representative Paul Gosar, who is representing Arizona, has met with the group, telling them that they are “in [a civil war], we just haven’t started shooting yet”. Gosar attended a 4 July 2020 event in Prescott, Arizona, where he took photos with men in Proud Boys shirts while a man in an Oath Keeper shirt looked on (see photo at left, via Vaughn Hillyard).

Paul Gosar is a far-right politician with connections to White Nationalists. He skipped a vote in the House to attend and [speak <](#)

<https://www.huffpost.com/entry/paul-gosar-white-nationalist->

[chanted his name < https://www.azmirror.com/2021/03/01/paul-gosar-spoke-to-a-white-nationalist-conference-and-they-chanted-his-name/>](https://www.azmirror.com/2021/03/01/paul-gosar-spoke-to-a-white-nationalist-conference-and-they-chanted-his-name/) in support. He's also one of the members of the far-right "America First Caucus" that just released a [policy < https://www.fastcompany.com/90626471/should-the-america-first-caucus-sound-an-alarm-about-white-nationalism>](https://www.fastcompany.com/90626471/should-the-america-first-caucus-sound-an-alarm-about-white-nationalism) platform in mid-April 2021. This caucus [claims < https://www.cbsnews.com/news/america-first-caucus-would-champion-anglo-saxon-political-traditions/>](https://www.cbsnews.com/news/america-first-caucus-would-champion-anglo-saxon-political-traditions/) to [push < https://www.cnn.com/2021/04/16/politics/marjorie-taylor-greene-america-first-caucus/index.html>](https://www.cnn.com/2021/04/16/politics/marjorie-taylor-greene-america-first-caucus/index.html) 'a uniquely Anglo-Saxon political tradition', a very thin dogwhistle even [rejected < https://www.forbes.com/sites/andrewsolender/2021/04/17/america-first-caucus-rejected-even-by-right-wing-freedom-caucus/?sh=2ddc7ae336a8>](https://www.forbes.com/sites/andrewsolender/2021/04/17/america-first-caucus-rejected-even-by-right-wing-freedom-caucus/?sh=2ddc7ae336a8) by some other right-wing caucuses like the 'Freedom Caucus'. The platform was so controversial, that three days after its release, the AFC's frontwoman, Marjorie Taylor Greene, said she was [suspending < https://www.forbes.com/sites/andrewsolender/2021/04/17/marjorie-taylor-greene-calls-off-america-first-caucus-following-backlash/?sh=135d2a164198>](https://www.forbes.com/sites/andrewsolender/2021/04/17/marjorie-taylor-greene-calls-off-america-first-caucus-following-backlash/?sh=135d2a164198) the caucus. As Trump was waffling over "many fine people" on "both sides", Representative Paul Gosar [continued < https://www.washingtonpost.com/news/morning-mix/wp/2017/10/06/arizona-congressman-repeats-bogus-claim-that-charlottesville-violence-was-left-wing-plot/>](https://www.washingtonpost.com/news/morning-mix/wp/2017/10/06/arizona-congressman-repeats-bogus-claim-that-charlottesville-violence-was-left-wing-plot/) to repeat the obviously [false < https://www.azcentral.com/story/news/politics/arizona/2017/10/05/arizona-rep-paul-gosar-pushes-far-right-conspiracies-charlottesville-george-soros/737205001/>](https://www.azcentral.com/story/news/politics/arizona/2017/10/05/arizona-rep-paul-gosar-pushes-far-right-conspiracies-charlottesville-george-soros/737205001/) claim [claim < https://www.businessinsider.com/paul-gosar-charlottesville-riots-george-soros-conspiracy-2017-10>](https://www.businessinsider.com/paul-gosar-charlottesville-riots-george-soros-conspiracy-2017-10) that 2017's Unite the Right in Charlottesville VA, which led to the murder of Heather Heyer, was a 'left-wing plot'. Gosar repeated similar dubious [claims < https://www.businessinsider.com/paul-gosar-charlottesville-riots-george-soros-conspiracy-2017-10>](https://www.businessinsider.com/paul-gosar-charlottesville-riots-george-soros-conspiracy-2017-10) after the storming of the US Capitol Building on J6.

The Prescott E-News blog, which is unabashed in its admiration for the Oath Keepers in general and the YCPT specifically, has also detailed a lot of these relationships, [writing < https://prescottnews.com/index.php/2020/10/04/oath-keepers/>](https://prescottnews.com/index.php/2020/10/04/oath-keepers/) just ahead of the 2020 election the following:

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“SINCE 2016, I HAVE ATTENDED A NUMBER OF OATH KEEPER MEETINGS IN CHINO VALLEY AND BEEN INVITED TO SPEAK DURING POLITICAL CAMPAIGNS. TO MY KNOWLEDGE, MANY OTHER LOCAL OFFICIALS AND CANDIDATES INCLUDING REP. NOEL CAMPBELL, SHERIFF SCOTT MASCHER, SHERIFF-ELECT DAVID RHODES, COUNTY ATTORNEY SHEILA POLK, COUNTY SUPERVISOR CRAIG BROWN AND REPRESENTATIVE-ELECT JUDY BURGESS HAVE ALL SPOKEN AND BEEN WARMLY RECEIVED AT OATH KEEPER MEETINGS. REPRESENTATIVE-ELECT QUANG NGUYEN, A VIETNAMESE REFUGEE, RECENTLY SPOKE TO A STANDING ROOM ONLY CROWD ABOUT HIS LIFE UNDER COMMUNISM AND HIS SUPPORT FOR THE SECOND AMENDMENT.”

The previous statement is written by David Stringer, the owner and publisher of the Prescott E-News, who describes his media organization’s role in engaging with the YCPT as part of the Prescott E-News’ stance that they are “committed to providing a platform for [the YCPT’s] vital public service.”

David Stringer is a disgraced public official who was pushed to **resign** < <https://www.azcentral.com/story/news/politics/arizona/2018/12/12/david-stringer-controversy-why-did-arizonans-prescott-voters-elect-him/2230605002/>> from the Prescott City Council over racist comments in 2018. Stringer was **recorded** < <https://www.azcentral.com/story/news/politics/arizona/2018/11/30/arizona-rep-david-stringer-facing-calls-step-down-said-african-americans-dont-blend/2166952002/>> in November 2018 expanding on his views on “multiculturalism”, saying that there aren’t “enough white kids to go around” in Arizona’s public schools, saying non-white Americans do not “blend in” after coming to the US, and calling immigration an “existential threat”.

Allegations related to this episode have featured highly on the Prescott E-News platform Stringer manages, including in an **interview** < <https://www.facebook.com/eNewsAZ/videos/467105077495417>> he hosted of himself with Prescott E-News staffer Glenn Martin. Behind the two, chatting at a table in July 2020, a “Stringer for County Attorney” sign sits below an “ENEWS” sign.

David Stringer chats with Glenn Martin for an internal interview in the Prescott E-News blog, allowing Stringer to use his journalistic platform to campaign

Technically, the Prescott E-News is not registered as an incorporated body in the state of Arizona. However, at the street address that the Prescott E-News team works (115 E Goodwin Street), there is a media company named “Specialized Publishing LLC” run by David Stringer that appears to be the body that controls the Prescott E-News. This Specialized Publishing LLC was founded in 2016 by Lynne LaMaster, who now runs CopperState news. Lynne lists on her LinkedIn that she was the owner and founder of “Prescott eNews” from June 2000 through May 2020. On the Arizona Corporation Commission’s site, the “Specialized Publishing LLC” previously owned and operated by LaMaster changed hands in April 2020, to be operated by Stringer at the 115 East Goodwin Street location:



The above filming location, used for most if not all Prescott E-News interviews and webcasts filmed inside, is the same location that Arroyo and Harworth discussed the YCPT's NPG units. This is the same location that a multitude of Jim's webcasts were recorded from for YCPT media channels (which have since been removed by the group from major platforms, but are all on Prescott eNews channels). Here's one, featuring the same "ENEWS" sign and Arizona flag and an "OATH KEEPERS" flag in place of a campaign sign:

One such video series recorded at the Prescott E-News webcast table is a November 2020 take from Jim Arroyo on “The Coming Civil War”, a 1-hour-long discussion in two parts that was also removed from YCPT media channels.

Glenn Martin, the host with the Prescott E-News who interviewed David Stringer and has interviewed Jim and Janet Arroyo several times, is also a member of the YCPT’s Mewe group and actively posts as though he is not solely an observer but an outright member of the organization. Here he is around Christmas addressing the group as “Patriots”:



Glenn is a fairly constant poster in the YCPT’s Mewe group, posting 18 times to the group’s wall and in the chat within the day of writing this post, during which he shared a screenshot of a post by the aforementioned far-right AZ representative Quang Nguyen, adding, “This is his freshman term... wait till his next term.... He’s just warming up. Conservative Republican and Oath Keeper.....”.

Paul Gosar, the right-wing GOP politician linked to white nationalist organizing and an originator of Arizona’s seemingly never-ending Stop the Steal endeavor, has also had his content reposted on the Prescott E-News site ([archive < https://web.archive.org/web/20210120200650/https://prescottnews.co](https://web.archive.org/web/20210120200650/https://prescottnews.co)

<https://www.facebook.com/eNewsAZ/posts/3987504357953048>>).

The YCPT site and media pages also give more insight into the group's connections. The YCPT site has numerous pictures in a slideshow. Among these is a photo taken including Mike Rice (the group's sole visible Black member) and Allen West, a high-profile Black Tea Party representative from Florida.



Allen West and Mike Rice ([archive <](#)
<https://web.archive.org/web/20210617213912/https://ycpt.org/wp-content/uploads/2021/02/Mike-Rice.jpg>>.)

The above photo is likely at a campaign event but is presented as promotional material for the YCPT. Rice is wearing an Oath Keepers shirt and a United States Concealed Carry Association (USCCA) morale patch on his hat, theater seating visible behind the two.

Other right-wing figures, such as Dave Hodges of “The Common Sense Show”, which spends a lot of time posting on caps lock about “CHICOMS” and “WW III”.



Dave Hodges and Jim Arroyo ([archive < https://web.archive.org/web/20210428211832/https://ycpt.org/wp-content/uploads/2021/01/Dave-Hodges-Jim.jpg >](https://web.archive.org/web/20210428211832/https://ycpt.org/wp-content/uploads/2021/01/Dave-Hodges-Jim.jpg))

In 2016, The YCPT also was apparently engaged in polling place observation, according to Jim Arroyo. They did this in Arizona at the same time as Roger Stone’s “Stop the Steal” efforts of that election were underway in the state. Arroyo **[told < https://kjzz.org/content/390334/questions-build-over-line-between-fraud-prevention-voter-intimidation-polls-arizona >](https://kjzz.org/content/390334/questions-build-over-line-between-fraud-prevention-voter-intimidation-polls-arizona)** journalists he and other Oath Keepers were there as part of “a surveillance operation”.

• • •

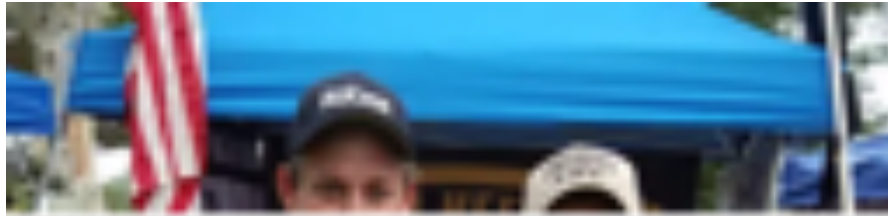
Connections to police

In the **[60 Minutes interview < https://www.youtube.com/watch?v=32h3Ua4nksg >](https://www.youtube.com/watch?v=32h3Ua4nksg)** of Jim Arroyo, Jim stated that active law enforcement are part of their group. He said this to push the group’s professionalism and knowledge. It’s a bit unclear about which officers are, but the group’s connections to law enforcement are easily detectable.

Among the YCPT meetings of 2020, at least one former NRA volunteer law enforcement instructor took the microphone to talk to the chapter. This man, first name Frank, claimed to have formerly provided instruction to the Maricopa

County and Yavapai County Sherriffs' offices. He came to the meeting to share his disdain for BLM co-founder Patrisse Cullors at a July 2020 meeting, mostly because of her faculty position at Prescott College, in the YCPT's own backyard. The Oath Keepers claim to be fighting against "neo-Marxists", so much of Frank's critique of Cullors is related to her interviews in which she identifies herself as a scholar of Marx.

The YCPT photo slideshow also features Jim Arroyo standing in front of an Oath Keepers tent next to an unnamed police officer wearing a shirt emblazoned with "Chief of Police" on it.



Man in "Police Chief" shirt with Jim Arroyo in front of an Oath Keepers tent ([archive < https://web.archive.org/web/20210617214440/https://ycpt.org/wp-content/uploads/2021/02/Tent.jpg >](https://web.archive.org/web/20210617214440/https://ycpt.org/wp-content/uploads/2021/02/Tent.jpg))

First up is confirming that this casualwear is part of a police department's uniform. Thankfully, a quick search for Chino Valley police results in an [article < https://www.dcourier.com/news/2016/aug/03/meet-your-neighbor-cvdp-debuts-new-patch-national- />](https://www.dcourier.com/news/2016/aug/03/meet-your-neighbor-cvdp-debuts-new-patch-national/) with the following photo, wherein the man on the left wears the same shirt as the man in the photo above, sans the "Chief of Police" stitching:



Two Chino Valley Police Department employees, showing two modes of CVPD dress. At left, a casual polo. At right, a formal uniform.

These two men are featured in an article about announcing a new police patch at a “National Night Out”, a pro-police community festival held in many locations in the US. The Chino Valley website has a [webpage <http://www.chinoaz.net/362/National-Night-Out>](http://www.chinoaz.net/362/National-Night-Out) devoted to this exact event, describing its goals:



Chino Valley AZ city website describing the “National Night Out” event in their city

In the screenshot above, the CVPD's chief is listed as "Charles Wynn", who had a 2015 profile in the Daily Courier, the same outlet as published the story on the department's new "modern" looking patch. In his profile, he is seated at a desk and named as "Chuck Wynn":



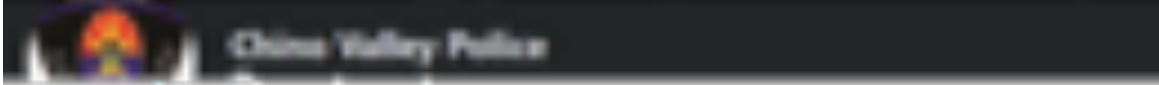
Chino Valley Police Department Chief Chuck Wynn, featured in a local paper

The National Night Out appears to be a pretty big deal in Chino Valley, and has become a yearly tradition known for the seasonal pro-cop party. In a recap **video** < <https://www.facebook.com/watch/?v=1273747172662209> > with an assortment of strange skits about the musical acts for the 2016 Night Out, Chief Wynn is visible, wearing his casual shirt and a confused look:

National Night Out 2018



The Chino Valley Police Department also has sold patches and hats at Mazy's, the gun store where YCPT leader Jim Arroyo works as a gunsmith:



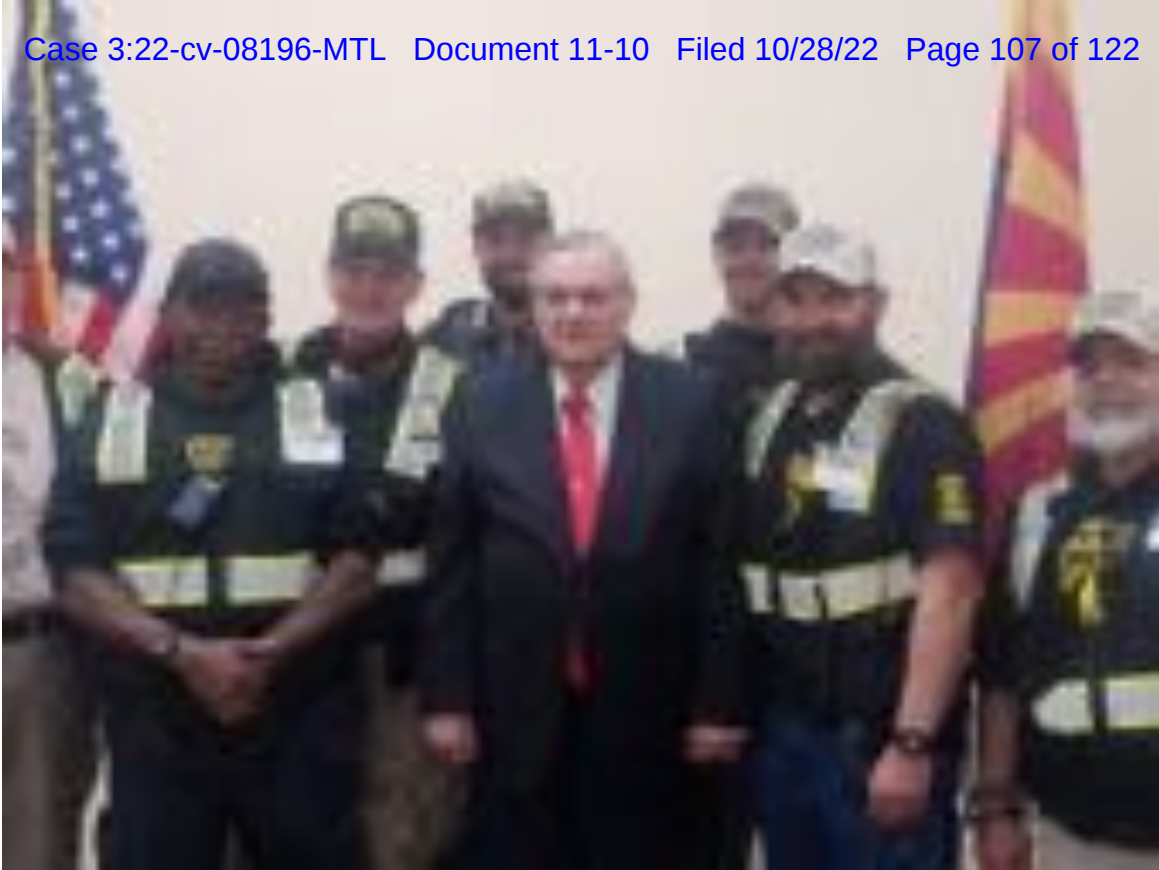
Post on the Chino Valley Police Department's Facebook ([link < https://www.facebook.com/permalink.php?story_fbid=2514038325299748&id=656334361070163>](https://www.facebook.com/permalink.php?story_fbid=2514038325299748&id=656334361070163))

Prescott E-News indicated that they attended a YCPT meeting with Sheriff Scott Mascher in attendance. The YCPT's slideshow also has a photo of Mr. Mascher from before he retired:



Scott Mascher's photo, as it appears on the YCPT's site ([archive < https://web.archive.org/web/20210428211554/https://ycpt.org/wp-content/uploads/2021/01/SHERIFF-SCOTT-MASCHER.jpg >](https://web.archive.org/web/20210428211554/https://ycpt.org/wp-content/uploads/2021/01/SHERIFF-SCOTT-MASCHER.jpg))

The same is the case for far-right Sheriff Joe Arpaio, who took a glamor shot with multiple YCPT members, including Mike Rice and Jim Arroyo, here:



Joe Arpaio visits the YCPT for a photo op ([archive < https://web.archive.org/web/20210428211548/https://ycpt.org/wp-content/uploads/2021/03/OK-Security-w-Sheriff-Arpaio.jpg>](https://web.archive.org/web/20210428211548/https://ycpt.org/wp-content/uploads/2021/03/OK-Security-w-Sheriff-Arpaio.jpg))

Joe Arpaio was notably given a **presidential pardon** < <https://www.theguardian.com/us-news/2017/aug/23/joe-arpai-donald-trump-signals-presidential-pardon-for-controversial-sheriff>> by Donald Trump regarding Arpaio's **charges** < <https://www.nytimes.com/2017/07/31/us/sheriff-joe-arpai-convicted-arizona.html>> related to his commitment to continue racial profiling against suspected Latino immigrants in Arizona.

The connections and comraderie with police isn't something of the past, either, as the YCPT plans to hang out with police for a fundraiser a few days after this post was written:

SUPPORT OUR LOCAL POLICE DEPARTMENT!

Corn Hole Tossing - Sunday, June 27 @

The Chino Valley Police Foundation is holding a Corn Hole Tournament at 2 pm on Sunday, June 27 at Memory Park in Chino Valley.

Entry fee is \$25.00 per two-person team.

Please contact Sofia at [REDACTED] to enter your team.

This sounds like a great way for friends and family to enjoy a Sunday afternoon, and to show our law enforcement we support and appreciate them!

< Back + More

YCPT Tangoes: 'Antifa' and 'BLM'

Jim Arroyo, like most Oath Keepers and indeed those in his own unit, are extremely concerned about the specter haunting Chino Valley, Arizona: leftist shenanigans. 95.5% of all videos viewed by MilitiaWatch as part of this investigation mentioned 'Antifa' and 86.4% mentioned 'BLM'. Both of which are often mentioned together and interchangeably. In a discussion about "Neighborhood Watch" programs, these actors serve as a boogeyman for which the Oath Keepers are to respond with force of arms. Those patrolling the street on behalf of the YCPT are to send a warning via walkie-talkie to a central 'command', which then sends out a 'Quick Reaction Force' (or 'QRF') to dissuade their adversaries.

In a May 2021 community meeting, the YCPT leader detailed the actions of Black Hammer, specifically a cadre of the group that had bought land in Colorado. Jim Arroyo said that the group — which he and other meeting attendees ridiculed over being feckless and ineffective — was evidence that communists had also taken over the United States. Shortly thereafter, Jim added that the "U.S. military has been heavily penetrated by the Communist Party — witchcraft, all kinds of crazy religions". The 'threat environment' of the YCPT, like with the Oath Keepers they claim to have distanced themselves from and the militia movement they claim not to be a part of, is exceedingly broad, convoluted, and ever-growing. These types of discussions — melding discussions about adversaries with complaints about the current state of affairs in the US — are a staple of YCPT meetings.

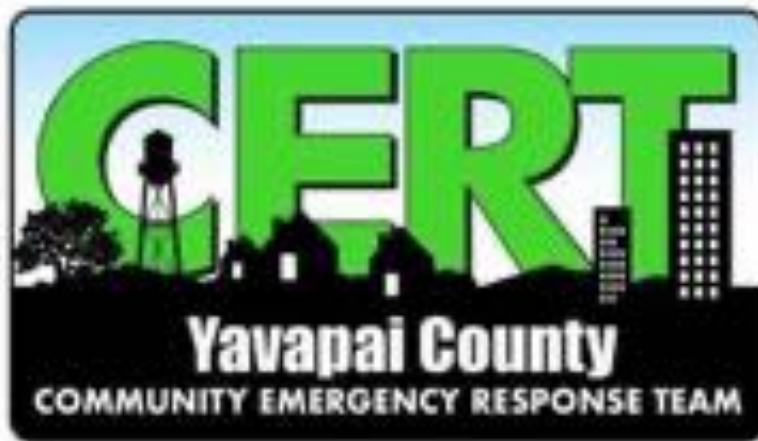
There is not yet any evidence that YCPT has ever interacted with BLM, Antifa, or other leftists. Nor is there yet documentation that they have activated the NPGs to respond to rumors about their adversaries.

Funding

As mentioned above, the YCPT incorporated as a non-profit to seek donations for disaster relief. While they have reported some individual donations, it does not yet appear that they have been successful in earning a major grant, private or federal or otherwise. As early as March 2020, Jim was saying they had the 501c3 specifically to apply for funding and grants, a line he has repeated during many meetings.

One of the things that seems to indicate a posture towards a possible channel for funding is the YCPT's alignment with CERT programs, the "Community Emergency Response Team" federal program that seeks to teach preparedness to communities before disaster response is needed. They have CERT logos alongside "Stop the Bleed" logos on their physical and web banners.

There is a Yavapai County CERT organization that is active in Prescott Valley:

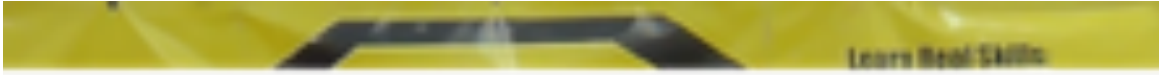


And the Yavapai County CERT group has hosted Jim and his big YCPT banner at least once in May 2019:

The Yavapai County CERT has also advertised a Three Percenters Original first aid training in the summer of 2019, too:



In addition to establishing the YCPT as a non-profit for donations and grant funding, Jim has used YCPT meeting time to advertise the group's coffee, known as "YCPT BREW", with its own corresponding line of YCPT-branded mugs. In transmissions, Jim refers to his coffee guy as "Jason", pointing him out to the crowd from his table at the front of the room.



Jim holding a bag of YCPT Brew at a YCPT meeting

While this isn't enough to determine who is supplying the group the coffee to sell, the YCPT posted on social media to advertise their coffee, which had a like from a Jason:





Jason Pangburn, as he is named on social media, has been a longtime member of the social media platform that the YCPT uses since 2014 (one of the earliest MilitiaWatch has seen):



Jason lists two companies on his profile: Divinitus Coffee and Beard Rescue. Divinitus Coffee just so happens to be listed on the bag posted by YCPT, too,



It wasn't hard to confirm Jason as the person in charge of Divinitus Coffee, which did, in fact, say it was incorporated in Dewey, Arizona at a location about half an hour away from the YCPT's meeting location at First Southern Baptist Church.



Addresses redacted as part of MilitiaWatch's 'no dox' policy, since these appear to be residential addresses.

Just out of curiosity, we then looked up the Beard Rescue company, which helpfully posted a semi-obsured trademark document on public social media:

Jason Pangburn
May 30 at 6:05 PM

Just completed a 'Stop the Bleed' training put on by YCPT - AZ Oath Keepers up here in Prescott. I hope I never have to use this training but I have been in a number of situations where it would have been very helpful. I wish I did this years ago.

14

3 Comments

This 30 May 2021 post by Jason shows an admittance that he attended one of the YCPT's trainings in Prescott, a city nearer than Chino Valley to the locations Jason's companies are incorporated.

Two developments

There are two important developments that speak to the direction of the YCPT. The first is a recalibration of their brand of Oath Keepers, nationally. The second is the group's new "political wing", launched in June after months of low-grade activity and planning.

Going national

The YCPT came out of a national movement (the Oath Keepers), split from the national organization over being alienated from national, and have now moved to establish a new national organization using their chapter's name. This national organization was created for a few different reasons, a primary one likely is to funnel interest in the Oath Keepers from the 60 Minutes interview towards an organization. As of the time of writing, YCPT's national organization has claimed to have chapters in Arizona and Illinois. Arroyo has said that the national body, like the Arizona chapter that precedes it, is pushing to incorporate as a tax-exempt non-profit to seek federal funding.

While YCPT's incorporation is on the books with the Arizona Corporation Commission, the national organization has yet to clear onto the agency's site. There are delays related to incorporation that may explain this, but it points to the newness of the YCPT's nationwide expansion when compared to the 2-year-long operation window of the YCPT under legal filings with the state.

The YCPT's new national organization appears to be a realization of an aspirational organization that Arroyo and company have been discussing for a while. So far, the organization is only in its infancy, but has established a chapter in Illinois and there are claims of other chapters being organized in Florida and elsewhere. This new development shows the YCPT in AZ understands

competition in the far-right/prepper space and specifically that Rhodes' Oath Keepers organization is looking quite weak on the national state. It also speaks to how important it is not to platform the group or their members because they have very much used several prominent media appearances to translate aspiration into organizational inertia. If they keep receiving this kind of major coverage (positive or otherwise), they will likely be able to continue to translate attention into organization.

• • •

Getting political

Established and led by "Lyle Rapacki" of Prescott Arizona, the "Yavapai Patriots" have made a recent feature at YCPT meetings. They filed to incorporate on 26 May 2021 as a domestic LLC for "Civic information and education" as their type. A trade name reservation was submitted in March 2021 ahead of the establishment of the LLC.

On 10 May 2021, Lyle Rapacki's news about establishing the "Yavapai Patriots" was published on the group's Facebook, with the subheader of none other than the constantly featured Prescott E-News:



Excerpt of a lengthy announcement post by Lyle J. Rapacki, Ph.D. in establishing the Yavapai Patriots on behalf of "WE THE PEOPLE"

Lyle Rapacki, because this network is so tightly wrapped, is of course also the host of a show on the Prescott E-News media environment. His program, "Arizona Today" has 20 uploads to its name, mostly about theories about how the election can be overturned:



Excerpt of Lyle's videos on the Prescott E-News site (archive)

Rapacki has run intelligence consulting firms for years. In 2009 he incorporated “Sentinel Intelligence Services, LLC”, and by a year later, had apparently written a leaked document labeled as an intelligence briefing on “Mexican Drug Gangs taking Over National Parks”. Within this document, Dr. Lyle argues that these cartels are growing “highly potent marijuana”:

Overview:

Mexico drug cartels stealthily and steadily are moving into the western National Parks of the United States. The absolute intention is to develop sophisticated areas for the growing of highly potent marijuana in farms that are heavily financed, and set-up as armed fortresses.

Marijuana has been cultivated on public lands in the United States for years, and even decades. What is different this time around is the level of sophistication employed by Mexican traffickers and drug cartels. Well-armed guards with AK-47s patrolling the perimeters of these farms, trip wires, kill-zones, land mines and crude IEDS just inside the cartel's designated perimeter, “spotters” with improved radio communications sitting atop high trees or rock formations, are now becoming common place, and a factor law enforcement must consider when interdicting.

The same report also argues that “Drug cartels hire marijuana experts” in their quest for more potent drugs to sell on the American market, which the cartels, Rapacki argues, intend “to take over... similarly to what they have with the methamphetamine business.”

Transparency USA, the group has earned contributions of \$5812 at the time of writing. The largest single donor is Lyle himself, who donated \$1553 to the PAC.

The YCPT is quite cozy with the Yavapai Patriots. Arroyo says he is a member of the Yavapai Patriots and attends their meetings, and allowed a representative to speak at his Oath Keepers meeting in June to fill the void of electoral action that the YCPT's legal standing does not allow.

Prescott E-News is also quite cozy with the Yavapai Patriots. Not only was the group announced on their site and led by one of their writers/content creators, but Dr. Rapacki lists his address as the same building as Prescott E-News. Here's Google's Streetview of the office building, with a Prescott E-News-emblazoned car in the handicap parking outside:



• • •

So who do the Yavapai Patriots fund?

The Yavapai Patriots have only one [expenditure](https://www.transparencyusa.org/az/pac/yavapai-patriots-100543) <
<https://www.transparencyusa.org/az/pac/yavapai-patriots-100543>



[pac/payees](#)> on behalf of a candidate. This was \$350 made to the campaign of Mark Finchem, a member of the Arizona House of Representatives. March Finchem is the Arizona **lead** < <https://www.phoenixnewtimes.com/news/rep-mark-finchem-was-arizona-coordinator-for-pro-militia-group-11498687>> for the Coalition of Western States, which supported the

Bundy occupation in Malheur Oregon, for which Finchem himself promoted three standoffs over email. Finchem **called** < <https://www.phoenixnewtimes.com/news/rep-mark-finchem-oathkeepers-charlottesville-deep-state-conspiracy-11249452>> Unite the Right a “Deep State” operation staged by Democrats, an argument he made in a blog post on his campaign website in 2017 following the deadly riot. Finchem is also a member of the Oath Keepers, according to an interview in 2014, during which he **said** < <http://www.inmaricopa.com/mark-finchem-arizona-house-candidate/>> “I’m an Oath Keeper committed to the exercise of limited, constitutional governance.” Finchem, like most politicians listed previously in this post, supported the “Stop the Steal” movement in Arizona, earning himself the **disdain** < <https://www.abc15.com/news/state/seven-arizonan-republican-legislators-face-calls-to-ban-them-from-the-house-and-senate>> of many members of the Arizona Legislature.

Network visualization

This article has named a ton of individuals, organizations, and the linkages between them. This can be difficult to grapple in just dry text and an occasional image, so here is a network visualization of all people and organizations mentioned here, sized by number of direct connections:



This is an exceptionally tight network (community detection determined essentially just 1 community of nodes). This is partially due to the way that network nodes were gathered — those who take photos and attend meetings or organize together are likely to do the same with others within the same network. One thing that is telling, though, is how close the GOP and the police are within this network.

The other story here is the potential flow of information from movements outside of the YCPT's immediate sphere and into a large, primed audience. The group is not in direct contact with but also is not far from actors such as Ammon Bundy or Nick Fuentes, for example.

Conclusions

The YCPT appears to be vying for national relevance and legal recognition currently, with the understanding that this could translate to authority and finances tomorrow. Their history of focus on political adversaries, military-flavored response organizations, and endless discussions of US civil war is unavoidably informing this future. The YCPT's ability to bring dozens and hundreds of participants at their events speaks to their size and influence in a waning Oath Keepers field, something they seem to be actively trying to use to their advantage.

Exhibit K

Steve Bannon hosts QAnon-linked activist to promote organization seemingly focused on intimidating voters

WRITTEN BY JUSTIN HOROWITZ

RESEARCH CONTRIBUTIONS FROM ALEX KAPLAN

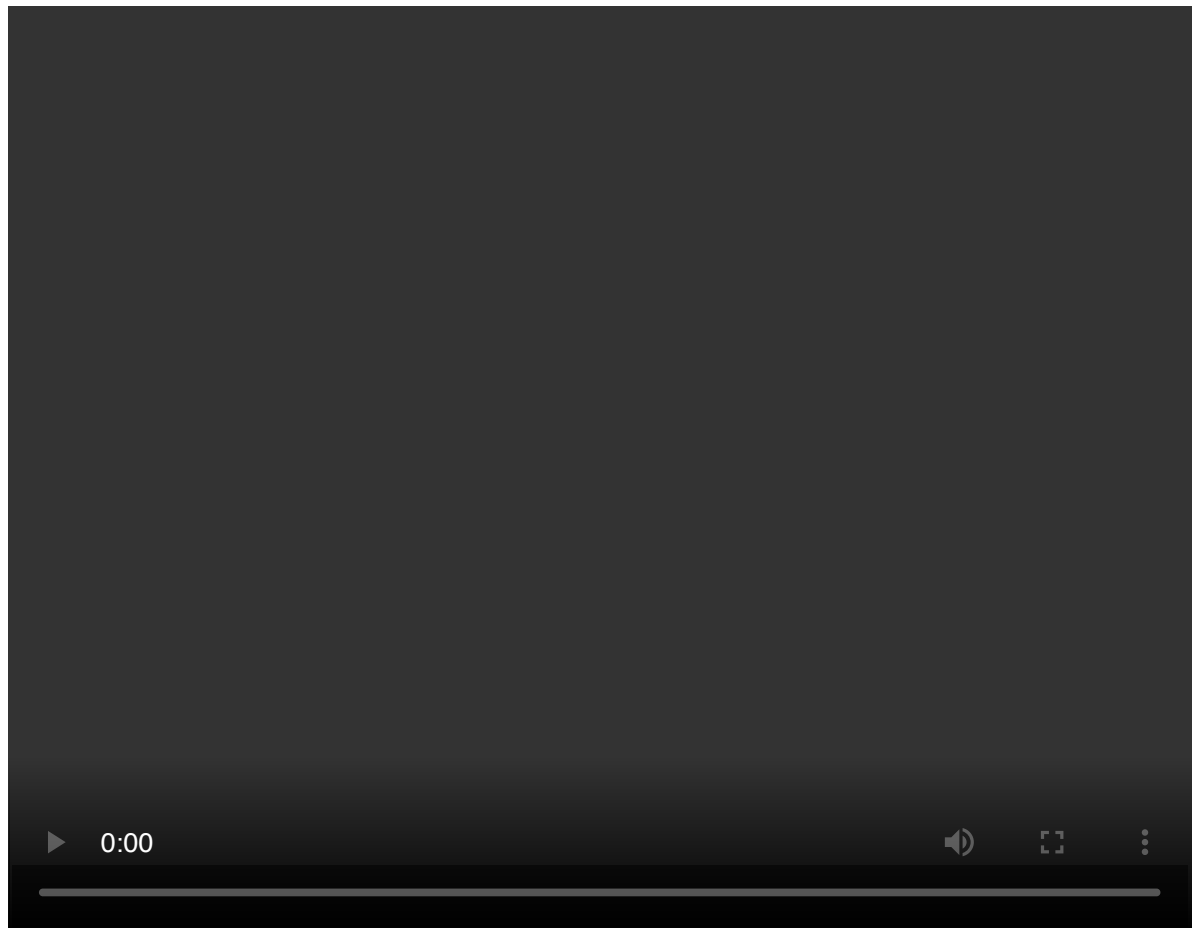
PUBLISHED 10/17/22 1:35 PM EDT

Former Trump aide and January 6 coup plotter Steve Bannon twice hosted QAnon-linked activist Melody Jennings on his *War Room* podcast to promote her group, Clean Elections USA. The organization appears to be centered around recruiting volunteers to stand watch over ballot drop box locations, raising concerns about voter intimidation.

During the October 15 edition of Bannon's show, Jennings explained the purpose of Clean Elections USA.

"We've got people ready to go in 18 states to go out in shifts and guard these boxes," said Jennings. "We've got people out there, on the ground and doing the work."

Jennings added that her group has "people around the box with iPhones, with, you know, Androids, with your own cameras, which is legal, by the way, we can video and we can take pictures."



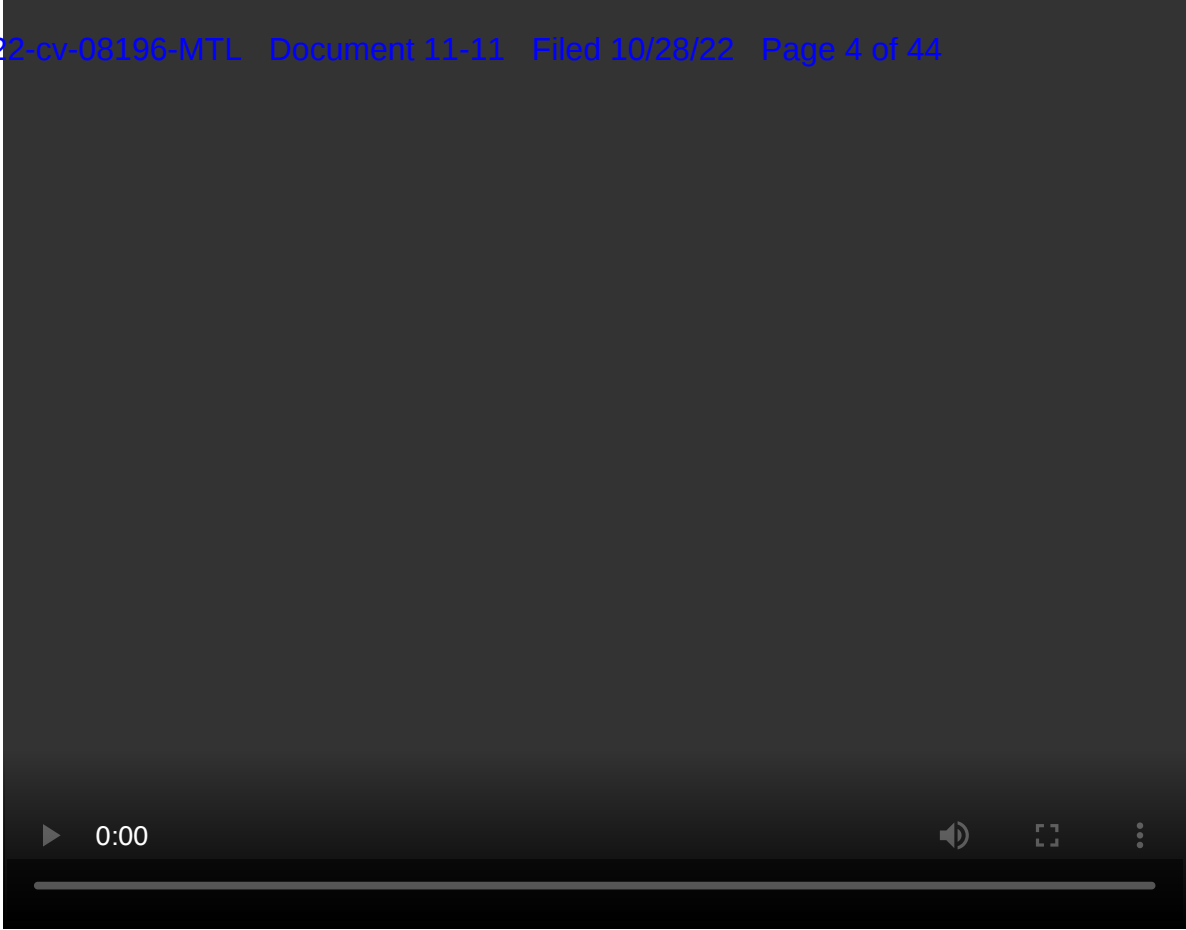
From the October 15, 2022, edition of Real America's Voice's *War Room: Pandemic*

On Telegram, the account associated with *MG Show* celebrated Jennings' appearance and shoutout. Additionally, Jennings has been a guest on *MG Show* in the past.



On October 17, Bannon again hosted Jennings to pitch her group to his listeners. During her second appearance, Jennings said her group is working to get 10 or more volunteers around each drop box.

Jennings added she will make sure that Clean Elections USA volunteers are "one of us," seemingly alluding to those who believe there is widespread voter fraud.



From the October 17, 2022, edition of Real America's Voice's *War Room: Pandemic*

Jenning's appearance continues a pattern of Bannon's podcast serving as a platform for QAnon.

Exhibit L



TrumperMel 

@TrumperMel · Sep 8

Hi! I am Drop Box Ninja Warrior Fire Beard TrumperMel and I am FULLY STOKED that ballot trafficking mules are about to be completely doxxed and put on blast at every drop box across America starting VERY SOON! We have the tech. We are the patriot army. We are the storm!

Come join us and have some fun while saving our country together     

<https://cleanelectionusa.org/>

@greggphillips

Exhibit M



← @TrumperMel's post



TrumperMel

@TrumperMel · Oct 17

All Arizona patriots get to either the Mesa box or the Phoenix box ...the only 2 that are outdoors... Right now.

There are mules getting there and doing their thing even with my people there. Here's what you DO NOT DO!! Do not go within 75 ft of the box. I need someone to park up on the opposite side of my crew there. A mule drove up moments ago backwards so we couldn't see his plate. Kept his back to us the whole time. Who will go now?

DO NOT ENGAGE THEM @greggphillips



3,284



7,453

Oct 17, 2022, 11:05 PM



Reply



Retruth



Like



Ghost of War

@GhostofWar · Oct 17

Replying to @TrumperMel and @greggphillips
Retruth this everywhere



1



11



30



PatriotsInControl

@PatriotsInControl · Oct 18

Replying to @GhostofWar, @greggphillips, and 1 more



Feed



Search



Alerts

Exhibit N



TRUTH.



TrumperMel

@TrumperMel · Oct 16

My dedicated drop box watching team caught this and sent it up the chain.
What do you see in the picture?

reddit.com/r/AskThe_Donald/com...



4,325 8,527

Oct 16, 2022, 11:38 PM

Reply

ReTruth

Like



John C Miller

@realjohncmiller · Oct 16

Replying to @TrumperMel
Way to go !

Exhibit O



Exhibit P



Steve Smith
@stevesmith

At 10 several people have been sitting outside the Mississippi County election headquarters in Adams outside of [redacted] [redacted]

They have their own cameras rolling, and last night at the [redacted] [redacted]

A woman here says she is here to get [redacted] [redacted]

[redacted] [redacted]



10/28/22

6 likes, 1 comment, 1 share

1,000 followers, 100 posts, 1,000 likes

View all posts



Exhibit Q



TRUTH.



TrumperMel

@TrumperMel · Oct 19

CBS NBC and others out in force filming our people at the Mesa Arizona drop box. We are filming them back. Get out there people. Let's go watch that box and make there heads pop.

@greggphillips @intheMatrixxx @shadygroove @HankReardon44 @kagdrogo @The_Authority

667 1,386

Oct 19, 2022, 8:22 PM

Reply

ReTruth

Like



wnelson13

@wnelson13 · Oct 19

Replying to @TrumperMel, @greggphillips, and 5 more
Great work Mel! Maybe those News Groups will film some mules. Doubt it but we can hope

2 3 34



TheSearch4Truth

@TheSearch4Truth · Oct 19

Replying to @wnelson13, @greggphillips, and 6 more
Now, wouldn't that be an awesome report!

9



Ripper57

@Ripper57 · Oct 20

Replying to @wnelson13, @greggphillips, and 6 more
If they do catch some "mules" on tape...it will just end up on the cutting room floor !!!
There is NO impartiality in the MSM. None.
Sad.

4

Exhibit R



News Blog @ [unreadable]

REUTERS: ARUPA is helping election officials have hard-fought rounds

But voters have been harassed

For days, I have received voter intimidation complaints.

A thread of left-wingers of the community I have interacted

with has called for voter

1,000 likes 100 retweets 1,000 views



News Blog @ [unreadable]

Let's see the old lady get together with the old lady and collecting a



News Blog @ [unreadable]

So if I happened to be standing there and you're in the front of



News Blog @ [unreadable]

Respect your rights

Twitter post text area





Wade Orsag @wadeorsag · 10/28/22
"Continuing my fight to help the nation lead the drug war with fraudulent cases. Another day, another case closed." [1/1](#)

Wade Orsag @wadeorsag · 10/28/22
"Continuing my fight to help the nation lead the drug war with fraudulent cases. Another day, another case closed." [1/1](#)

Wade Orsag @wadeorsag · 10/28/22
"Continuing my fight to help the nation lead the drug war with fraudulent cases. Another day, another case closed." [1/1](#)

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"Continuing my fight to help the nation lead the drug war with fraudulent cases. Another day, another case closed." [1/1](#)

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"Continuing my fight to help the nation lead the drug war with fraudulent cases. Another day, another case closed." [1/1](#)

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"Continuing my fight to help the nation lead the drug war with fraudulent cases. Another day, another case closed." [1/1](#)

Wade Orsag @wadeorsag · 10/28/22
"Continuing my fight to help the nation lead the drug war with fraudulent cases. Another day, another case closed." [1/1](#)

Wade Orsag @wadeorsag · 10/28/22
"Continuing my fight to help the nation lead the drug war with fraudulent cases. Another day, another case closed." [1/1](#)

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"Continuing my fight to help the nation lead the drug war with fraudulent cases. Another day, another case closed." [1/1](#)

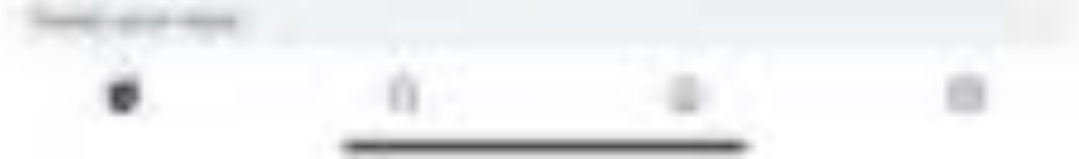






Exhibit S



Exhibit T



← @TrumperMel's post



TrumperMel 

@TrumperMel · Oct 17

This guy. Drove in backwards to avoid plate detection. Got out showing his back. Pulled ballots out of his shirt. I need people there tonight to help my people. Lots of you! 75 ft away from box, post up opposite so we see both sides. Someone get tags. No talking to them. Do NOT GO INSIDE 75 ft! They are trying to get us to engage them. Do not do it!



Exhibit U

4 11/11/2022



Wendy Gregg (@wendygregg)

VTAMMity [?], we're just not here getting some information [?] seems to be the key information on several are watching & looking drop like outside the scope of operation HQ in NJ

This group says they're with Open Elections NJ, but wouldn't estimate on if they're volunteers, or what



2022 views

2022 views

1,000 views, 500 likes, 100 retweets



Wendy Gregg (@wendygregg) · 11/11/2022

View and reply



Exhibit V



TrumperMel

@TrumperMel · 5d

Replying to @ipod49, @intheMatrixxx, and 3 more

Someone called in seeing 2 of our people in tactical gear and armed. They will always gear up for a call like that. Thankfully wearing tactical gear and carrying in our country where the right to bear arms is an inalienable right, can and should be respected, especially when the goal is protecting the sovereign rights granted of every American citizen to a free and fair election. To me it was all a win/win. #backtheblue #2A #freedom #gotv #vote



29



139

Oct 22, 2022, 7:46 PM



Reply



ReTruth



Like



SteveMartens

@SteveMartensUSA · 5d

Replying to @TrumperMel, @intheMatrixxx, and 3 more

great news Mel, WE THE PEOPLE demand fair Elections including the right to bear arms. keep going you are a rock star.



1



11



TrumperMel

@TrumperMel · 5d

Replying to @ipod49, @intheMatrixxx, and 3 more

@intheMatrixxx



1



7



Triunity

@TankGirl · 5d

Replying to @TrumperMel, @intheMatrixxx, and 3 more

I'm thinking [they] better get used to seeing this. We are tired and fed up. But we are not defeated.

Regardless of status, they should be reminded of the Battle of Athens. We will not back down until righteous judgement is served.

#WETHEPEOPLE



Feed



Search



Alerts

Exhibit W

CRIMINAL JUSTICE & POLICING

ELECTION 2022

ELECTIONS

Republicans are urging vigilantes to watch ballot drop boxes, polling locations, to sniff out fraud

BY: JEROD MACDONALD-EVOY - AUGUST 2, 2022 6:30 AM



Photo by Jerod MacDonald-Evoy | Arizona Mirror

At a nearly 4-hour “election security forum,” Lake Havasu Republican Sonny Borrelli and Oro Valley Republican Representative Mark Finchem both had the same message for the fired up audience in attendance: Watch the drop boxes.

“We need to be force multipliers,” Borrelli told the crowd in Tempe Saturday. “We need to have people camped on unmanned drop boxes and camp on those and keep an eye on them and take down that data, license plates, pictures and so on and so forth.”



Tom Ryan

@tomryanlaw · [Follow](#)



Sole purpose of this kind of assbattery is to intimidate voters. They are not trained election officers.

VoteForShamp  @VoteForShamp

Who else is having Dropbox tail gate parties?! Arizona Patriots are strong together!! Love the hat sir! @KariLake

Borrelli's call to action is similar to one made earlier this year by Sen. Kelly Townsend, R-Mesa, [who praised "vigilantes"](#) who intended to spy on dropboxes; she implored them to use trail cameras and to get people's license plate numbers. The calls to action stems from allegations made in a [highly flawed](#) film by [controversial filmmaker Dinesh D'Souza](#).

And Mark Finchem, one of the state's loudest proponents of baseless election fraud claims who is running to oversee elections as secretary of state, urged attendees to show up at their local polling places on Tuesday to monitor voters and watch for suspicious activity.

"Stand 75 feet away from the entrance of the polls," Finchem, who is running for Secretary of State, said. "The mere fact that you are there watching scares the hell out of them."

There is an official process for election observers at polling locations. Observers must be authorized by a political party. Only one can be at each polling site, and they cannot interact with voters.

Republicans and activists have been gearing up for poll watching and drop box watching parties across the state, boosted by candidates and election deniers. Scott Presler, who gained fame in

conservative circles for [traveling across the country](#) picking up trash in Democratic run cities, is [planning to recruit volunteers](#) to watch drop boxes in the state. Presler also was the [national coordinator for an anti-Muslim group](#) whose [leader has said](#) that Muslims should not be Americans because they cannot be loyal to the country.

Dropboxes have become a focal point among election fraud believers and during Arizona's past legislative session, a litany of bills were presented to ban, limit or change their use. In Maricopa County, the county with the largest population, there are only two outdoor drop boxes – one of which is at the county elections headquarters.

“Sounds boring. And hot,” Maricopa County Recorder Stephen Richer told the *Arizona Mirror* about those who plan to monitor drop boxes in Maricopa County. “And if you harass, intimidate, or deter a voter, it’s unlawful.”

Maricopa County Sheriff Paul Penzone has [previously said](#) that his office is pouring resources into protection of polling places and watching “trends” to ensure that no bad actors harass or intimidate election officials.

But other sheriffs are embracing conspiracy theory rhetoric to police drop boxes.



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Pinal County Sheriff Mark Lamb, along with [another organization he has a lead role](#) in, has partnered with True the Vote, a conspiratorial organization that worked with D’Souza on his flawed election fraud film.

“We will engage voters, we’ll help clear up confusion through education and where necessary Sheriffs can and will investigate where laws are being broken,” Lamb [says in a video](#) on the Protect America Vote website.

Protect America Vote is a nonprofit that aims to educate voters and connect them with local sheriffs and give local sheriffs the resources they need to investigate election-related issues. True the Vote has raised millions of dollars claiming to have found voter fraud in multiple elections but [has never released evidence](#).

When the *Mirror* asked the Pinal County Sheriff’s Office about True the Vote’s [track record on election fraud claims](#) and [claims of](#)

“PCSO has added extra patrols to polling sites and ballot collection boxes,” Reimer said. “Reports of any election laws being broken will be investigated. We encourage everyone to review our state laws prior to voting. You can find them in our Secretary of State’s Election Procedures Manual. As it pertains to the rest of your questions, you will have to reach out to that group directly for comment.”

Reimer did not respond to follow up inquiries, and Protect America Now did not respond to the *Mirror’s* request for comment. Protect America Now [told Reuters](#) that it would be surveilling drop boxes and using “artificial intelligence” software to analyze surveillance video.

“There have not been any discussions with the Recorder’s Office related to the program you reference,” James Daniels, a spokesman for the Pinal County Recorder’s Office, said to the *Mirror*. “But Sheriff Lamb has gone out of his way to be supportive to Pinal County [through our recent ballot error issues](#), only offering his time and effort to help get across the important message to impacted municipalities that they must vote a separate municipal-only ballot for their city/town contests.”

Lamb is part of a [larger contingent of sheriffs](#) that True the Vote has spurred into action across the country and they have around 70 sheriffs in 30 states, according to Reuters. It also includes supporters like former Graham County Sheriff Richard Mack of the Constitutional Sheriffs and Peace Officers Association, an [anti-government extremist group](#) with [ties to the Oath Keepers](#).

Back at the “election security forum,” gubernatorial candidate Kari Lake and other state lawmakers said they intend to bring back failed “election integrity” bills next session including banning drop boxes and making voting a one-day event.

Still, Lake still encouraged the crowd to mail in their ballots if they hadn’t done so yet.

“We will drag it back out into the spotlight and we will find every loophole they use to cheat,” Lake said about the perceived issue of election fraud.

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JEROD MACDONALD-EVOY

Reporter Jerod MacDonald-Evoy joins the Arizona Mirror from the Arizona Republic, where he spent 4 years covering everything from dark money in politics to Catholic priest sexual abuse scandals. Jerod has also won awards for his documentary films which have covered issues such as religious tolerance and surveillance technology used by police. He brings strong watchdog sensibilities and creative storytelling skills to the Arizona Mirror.

[MORE FROM AUTHOR](#)

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BY JEREMY DUDA

October 11, 2021



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BY RACHEL LEINGANG/VOTEBEAT

September 23, 2022

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Exhibit X



Tweet



Kelly Townsend
@AZKellyT



I should not have to say this but wearing tactical gear while watching a ballot drop box could be considered voter intimidation. Don't do it.

10:01 AM · 10/24/22 · [Twitter for iPhone](#)

71 Retweets 19 Quote Tweets 562 Likes



AZ Right Wing Watch @az_rww · 3d
Replying to @AZKellyT



This you?



AZ Right Wing Watch @az_rww · 5/31/22

Sen. Kelly Townsend suggesting voter intimidation in the upcoming election:

twitter.com/az_rww/status/... twitter.com/az_rww/status/...

[Show this thread](#)

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USE PROMO CODE "RSBN"

SUPPORT RSBN & MIKE LINDELL BY SHOPPING AT MYPILLOW.COM
ENTER PROMO CODE "RSBN" AT CHECKOUT FOR UP TO 66% OFF

RSBN

Tweet your reply



Exhibit Y



Thread



jack healy
@jackhealyNYT



An Oath Keeper-affiliated group staking out ballot drop boxes in Arizona got sued, and now says it's retreating

To All Members of The Lions of Liberty and Yavapai County Preparedness Team:

As many of you know, we have been facing pending Litigation due to Operation Drop Box. The hammer has unfortunately fallen. We The lions of liberty have been named in a federal lawsuit. Unfortunately, we were named with other organizations with whom we have no association, and whose desire for law and order is much less than ours. Due to this fact and a possible restraining order, we are stepping down our sponsorship of Operation Drop Box. This is an Official Stand Down order. From this point going forward there will not be any more organization from The Lions of Liberty. We are extremely grateful to all who stepped up and made your community proud. We are proud to have been part of this opp with you. Moving forward Operation Drop Box is officially Closed.

11:26 AM · 10/27/22 · [Twitter Web App](#)

2,116 Retweets 236 Quote Tweets 7,389 Likes



jack healy @jackhealyNYT · 21h
Replying to @jackhealyNYT



fyi this was an emailed statement to their volunteers this morning.

4

46

456



3Cs: Toil and Trouble @CannabisForAll · 22h
Replying to @jackhealyNYT and @BradMossEsq



Tweet your reply



Exhibit Z



One of Trumps Deplorables 🍌
@JeannieGiering

Avatar

Janae Shamp

Who else is having Dropbox tailgate parties?! Arizona Patriots are strong together!! Love the hat sir!

5h

Replying to @RealSKeshel

We are running with your drop box tailgate parties. We ram one mule off just by being there...



Tweet your reply



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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

League of Women Voters of Arizona,

Plaintiff,

vs.

Lions of Liberty LLC; Yavapai County
Preparedness Team; Jim Arroyo, Lucas
Cilano; Nicholas Cilano; Brian Mounsey;
Toby Fox; Bruce Mounsey; James Johnson;
Melody Jennings; Clean Elections USA;
John Does 1-10,

Defendants.

No. CV-22-08196-PCT-MTL

**ORDER GRANTING PLAINTIFF’S
MOTION FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Plaintiff League of Women Voters of Arizona (“Plaintiff” or “the League”) moved to enjoin Defendants Melody Jennings, Clean Elections USA, and John Does 1-10 for violations of the Voting Rights Act and the Ku Klux Klan Act. Having considered the parties’ pleadings, arguments of counsel, and the record in this case, the Court finds that Plaintiff have demonstrated all of the following: a strong likelihood of success on the merits; that, absent an injunction, they face immediate, irreparable injury from Defendants’ actions; and that the balance of the equities and the public interest favor immediate preliminary injunctive relief.

Therefore, the Court hereby **GRANTS** Plaintiff’s Motion for a Temporary Restraining Order and Preliminary Injunction and orders the following:

1. All Defendants, their officers, agents, servants, employees, and all persons in concert, privity, or participation with them must remove and take down any

1 statement that (falsely) conveys that an individual violates Arizona law anytime
2 they deposit multiple ballots in a drop box, or Defendants shall be prosecuted for
3 criminal contempt;

4 2. Defendants Jennings and Clean Elections USA shall communicate to their officers,
5 agents, servants, employees, and all persons in concert, privity, or participation
6 with them that Clean Elections USA has ceased the set of activities it refers to as
7 “Dropbox Initiative 2022” and Defendant Jennings has ceased her role
8 coordinating “Dropbox Initiative 2022,” or these Defendants shall be prosecuted
9 for criminal contempt.

10 3. Defendants, their officers, agents, servants, employees, and all persons in active
11 concert, privity, or participation with them are **ENJOINED** from training,
12 organizing, encouraging, or directing others to:

13 a. Follow, take photos of, or otherwise record individuals delivering ballots to
14 a drop box;

15 b. Harass or verbally engage with individuals returning ballots to a drop box.

16 c. In connection with any specific claim that individuals committed voter
17 fraud based solely on the fact that they deposited multiple ballots in a drop
18 box, post online or otherwise disseminate images or recordings of, or
19 personal information about, individuals who return ballots to a drop box,
20 including but not limited to information about the individuals’ identity, their
21 distinguishing features, their license plate number, model and make of car,
22 and/or similar information; or

23 d. Openly carry firearms and/or wear body armor within 250 feet of drop
24 boxes.

25 4. Defendants, their officers, agents, servants, employees and all persons in active
26 concert, privity, or participation with them are further **ENJOINED** from:

27 a. Following, taking photos of, or otherwise recording individuals returning
28 ballots to a drop box.

- b. Harass or verbally engaging with individuals returning ballots to a drop box;
 - c. In connection with any claim that individuals committed voter fraud based solely on the fact that they deposited multiple ballots in a drop box, posting online or otherwise disseminating images or recordings of, or personal information about, individuals who return ballots to a drop box, including but not limited to information about the individuals' identity, their distinguishing features, their license plate number, model and make of car, and similar information; or
 - d. Openly carrying firearms and/or wearing body armor within 250 feet of drop boxes.
5. Defendant Jennings and Clean Elections USA shall post a copy of this injunction on its website, cleanelectionsusa.org, and include a prominently located hyperlink to this injunction on its homepage and a 1-sentence notice that an individual does not necessarily violate the law when they deposit multiple ballots in a dropbox.
6. Defendant Jennings shall post a hyperlink to the copy of this injunction hosted on cleanelectionsusa.org, along with images of the injunction's text, to her Truth Social page, @TrumperMel, daily from today until Wednesday, November 9 and a 1-sentence notice that an individual does not necessarily violate the law when they deposit multiple ballots in a drop box.
7. No person who has notice of this injunction shall fail to comply with it, nor shall any person subvert the injunction by sham, indirection, or other artifice.
8. Defendants shall promptly provide Plaintiff's counsel the list of volunteers and agents cooperating with Defendants so that Plaintiff's counsel can verify compliance with the injunction.
9. The bond requirement is hereby **WAIVED**.
10. This injunction will go into effect immediately and shall remain in effect pending further order from this Court.

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IT IS SO ORDERED.