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

16 **IN AND FOR THE COUNTY OF MARICOPA**

17 JAMIE WEINHAUER MARTIN,

18 Plaintiff,

19 vs.

20 MARICOPA COUNTY, ACTING
21 THROUGH THE RECORDER'S
22 OFFICE, ELECTIONS
23 DEPARTMENT, OFFICE OF
24 PROCUREMENT SERVICES,
25 INFORMATION GOVERNANCE,
26 AND THE BOARD OF
27 SUPERVISORS

28 Defendants.

No. CV2025-063720

DEFENDANTS' RESPONSE BRIEF

(The Honorable Randall Warner)

RESPONSE BRIEF

Introduction

In this special action, Plaintiff Jennifer Weinbauer Martin (the “Plaintiff”) alleges that Defendants have denied her public records requests. Her public records request sought a plethora of records maintained by various county offices and departments. In her brief, Plaintiff presents the issue as whether Defendants have met their duty to provide her with responsive documents. She also alleges that statute requires the Defendants provide her with documentation on the scope and methodology of their search and with citations for the withholding of any information. Plaintiff asks the Court to order Defendants conduct another search for responsive public records, provide her with any responsive public records not previously produced, and to provide her with a Section 39-121.01(D)(2) index of withheld records.

Statement of Facts

A. April 15th Public Records Request

On April 15, 2025, Plaintiff submitted a public records request to the Maricopa County Office of Procurement Services (hereafter “Procurement Services”). [Ex. B at pdf 1] This public records request was designated as OPS Record # 719 (hereafter “PRR 719”). [Ex. B. at pdf 1] Through this request, Plaintiff sought contracts related to the 2018, 2020, and 2024 elections,¹ specifically asking for contracts from the Arizona Motor Vehicle Division, Dominion, Runbeck, and “first level signature verification with temp agency contract” for those years. [Ex. A at pdf 7-9; Ex. B at pdf 1] Plaintiff’s request also stated she wanted “to see how AZ 16-452 is impacted by the same contractual conditions that were missed.” [Ex. A at pdf 9]

In response to PRR 719, Plaintiff was informed that there were no contracts with the Motor Vehicle Division. [Ex. B at pdf 2] On April 28, 2025, Plaintiff was provided with the responsive records as an attachment to an email. [Ex. B at pdf 2-3] No responsive

¹ Plaintiff’s public records request did not request any records related to the 2022 election.

1 records were withheld from Plaintiff. [Zbiegien Affidavit at ¶¶ 8, 9]

2 **B. May 15th Public Records Request**

3 On May 15, 2025, Plaintiff submitted a public records request to the Information
4 Governance Department for Maricopa County (hereafter “IGD”). [Ex. C at pdf 1; Zbiegien
5 Affidavit at ¶ 10] This public records request was designated as IG Record # 1123 (hereafter
6 “PRR 1123”). [Ex. C. at pdf 1] Plaintiff’s request sought various types of records she
7 enumerated in six parts, which IGD described as six items. [Ex. C. at pdf 1; Ex. D at pdf 2;
8 Wilson Affidavit at ¶¶ 10, 11] In her request, Plaintiff specifically stated, “Please provide
9 the following records and explanations for the 2020 election, as required by A.R.S. § 39-
10 121 (public records access);” followed by the six items.² [Ex. C at pdf 1]

11 For the first item, Plaintiff referred to Section 16-452 and asked for “[d]ocumentation
12 showing compliance with the Secretary of State’s Instructions and Procedures Manual,
13 ensuring ‘maximum degree of correctness, impartiality, uniformity, and efficiency’ in ballot
14 handling” and for “[r]eports or metrics . . . justifying approval of 2020 election results.”
15 [Ex. C at pdf 1]

16 For the second item, Plaintiff referred to Section 16-161 and asked for “[r]eports
17 submitted to the Secretary of State on voters registered without proof of citizenship,
18 including ballots cast for federal offices only, per § 16-168(G).” [Ex. C. at pdf 1]

19 For the third item, Plaintiff referred to Section 16-121 and asked for “[p]rocesses and
20 reports used to maintain accurate voter lists, ensuring only eligible voters were included.”
21 [Ex. C. at pdf 1]

22 For the fourth item, Plaintiff referred to Section 16-165 and asked for “[r]ecords of
23 checks to remove deceased voters from rolls, including any identified failures and corrective
24 actions.” [Ex. C at pdf 1]

25 For the fifth item, Plaintiff referred to Section 16-166 and asked for
26 “[d]ocumentation of voter registration data reported to the Secretary of State, including
27

28 ² Plaintiff only requests records related to the 2020 election.

1 compliance with federal form requirements.” [Ex. C at pdf 1]

2 For the sixth item, Plaintiff requested documents related to the 2020
3 Runbeck/Dominion contracts, including “evidence of compliance with contract terms,
4 including certification of Dominion’s software/hardware by the Secretary of State, source
5 code escrow with the Secretary of State, maintenance of Optech Insights and 400-C units,
6 and explanation for strikethroughs in Runbeck/Dominion contract disaster recovery
7 language . . . and why new contracts were not initiated.” [Ex. C at pdf 1 (cleaned up)]

8 That same day, IGD determined any responsive public records to items one and six
9 would be held by the Maricopa County Elections Department (hereafter the “Elections
10 Department”) and any responsive public records to items two through five would be held
11 by the Maricopa County Recorder’s Office (hereafter the “Recorder’s Office”). [Ex. C at
12 pdf 2; Zbiegien Affidavit at ¶ 11] Accordingly, IGD sent items one and six to the Elections
13 Department and forwarded items two through five to the Recorder’s Office and informed
14 Plaintiff of this action. [Ex. C at pdf 2; Zbiegien Affidavit at ¶ 11]

15 **1. Elections Department**

16 Upon receiving the public records request, the Elections Department designated it as
17 EC Record # 139 (hereafter “PRR 139”). [Ex. D at pdf 1] On June 11, 2025, the Elections
18 Department informed Plaintiff it had no responsive records for item one, that items two
19 through five were forwarded to the Recorder’s Office, and that any responsive records to
20 item six would be housed with the Secretary of State. [Ex. D at pdf 2; Zbiegien Affidavit
21 at ¶ 12] Plaintiff also received this response from IGD. [Ex. A at pdf 24] The Elections
22 Department did not withhold any responsive records from Plaintiff. [Zbiegien Affidavit at
23 ¶ 13]

24 **2. Recorder’s Office**

25 Plaintiff received confirmation from the Recorder’s Office of being forwarded items
26 two through five on May 15, 2025. [Ex. A at pdf 29] The email noted that the Recorder’s
27 Office designated her request as Request # 25-64 (hereafter “PRR 25-64”). [Ex. A at pdf
28 29] In the email, the Recorder’s Office stated Plaintiff’s request was for: (2) “[r]eports

1 submitted to the Secretary of State on voters registered without proof of citizenship,
2 including ballots cast for federal offices only[;]" (3) "[p]rocesses and reports used to
3 maintain accurate voter lists, ensuring only eligible voters were included[;]" (4) "[r]ecords
4 of checks to remove deceased voters from rolls, including any identified failures and
5 corrective actions[;]" (5) "[d]ocumentation of voter registration data reported to the
6 Secretary of State, including compliance with federal form requirements." [Ex. A at pdf
7 29; Wilson Affidavit at ¶ 3-5]

8 On June 24, 2025, the Recorder's Office emailed Plaintiff to fulfill her public records
9 request. [Ex. A at pdf 32] The Recorder's Office informed Plaintiff that she would be
10 provided with records responsive to item two, which would be provided through a secure
11 link. [Ex. A at pdf 32] Plaintiff was also informed of the processes she asked for in items
12 three and four could be found in the Elections Procedures Manual. [Ex. A at pdf 32] Lastly,
13 the Recorder's Office noted for item five, that Plaintiff had referenced Section 16-166,
14 which had no requirement for reporting and asked her to clarify the statute or specific report
15 she was requesting. [Ex. A at pdf 32]

16 The Recorder's Office sent Plaintiff a link to access the responsive records. [Wilson
17 Affidavit at ¶¶ 8, 9] The Recorder's Office received an automated notice that the link was
18 used several times. [Wilson Affidavit at ¶ 10] On June 27, 2025, the Recorder's Office sent
19 Plaintiff an email notifying her that all responsive records had been released and the request
20 had been fulfilled and was now closed. [Ex. A at pdf 39] The Recorder's Office did not
21 withhold any responsive records from Plaintiff. [Wilson Affidavit at ¶ 11]

22 **Statement of the Case**

23 On December 1, 2025, Plaintiff initiated a special action alleging public records
24 responsive to her April 15th, 2025, request had been withheld. [Ex. A at pdf 3] Defendants
25 submitted an Answer on December 23, 2025. [See Answer] The Court held a status
26 conference on January 21, 2026, and subsequently ordered briefing. [Minute Entry
27 01/21/2026] Plaintiff filed her initial brief on February 18, 2026. [Plaintiff's Brief] Plaintiff
28 also makes several allegations concerning her May 15th, 2025, public records request, so

1 the Defendants assume she means to challenge the response to it as well and concede any
2 argument that she did not.

3 Argument

4 I. Plaintiff was provided with all responsive public records.

5 Plaintiff alleges that Defendants have failed to produce all responsive records. She
6 contends that only four base contracts have been produced and that more records must exist.
7 Under Section 39-121.01(D)(1), a person may request copies of public records. A.R.S. §
8 39-121.01(D)(1). Responsive public records must be produced promptly. *Id.* There is no
9 obligation for a public entity to create a record in response to a public records request.
10 *Lunney v. State*, 244 Ariz. 170, 177, ¶ 19 (App. 2017) (citing *Lake v. City of Phoenix*, 222
11 Ariz. 547, 551, ¶ 15 (2009)).³

12 Plaintiff believes that not all responsive records have been provided to her. She
13 admits receiving two Runbeck and two Dominion contracts in response to her April 15,
14 2025, public records request, yet she claims that not all records have been produced.
15 According to Plaintiff, there must be amendments, revisions, addenda, administrative
16 records, and certifications of completeness or nonexistence that exist and be held or
17 provided by the Defendants.

18 It is unclear why Plaintiff believes additional records must exist. In PRR 719 she
19 refers to Section 16-452, but this section does not require any of the Defendants to make
20 the supposedly missing documents. *See* A.R.S. § 16-452. In PRR 1123, the May 15th,
21 2025, request, Plaintiff also refers to Section 16-452 along with Sections 16-121, 16-165,
22 and 16-166 for records she is requesting but, again, none of the statutes require any of the
23 Defendants to make the types of records she is seeking.

24 Statutory interpretation begins by examining the plain text of the statute. *State v.*
25 *Christian*, 205 Ariz. 64, 66, ¶ 6 (2003) (citing *Zamora v. Reinstein*, 185 Ariz. 272, 275
26
27

28 ³ Opinion freely available at <https://app.vlex.com/vid/895347347>.

1 (1996).⁴ If the text is clear and unambiguous, a court will not apply other methods of
2 statutory interpretation. *Hayes v. Continental Ins. Co.*, 178 Ariz. 264, 268 (1994).⁵

3 A. Plaintiff's May 15th request for public records.

4 Going item by item for Plaintiff's May 15th public records request, for item one, she
5 refers to Section 16-452 and requests "[d]ocumentation showing compliance with the
6 Secretary of State's Instructions and Procedures Manual, ensuring 'maximum degree of
7 correctness, impartiality, uniformity, and efficiency' in ballot handling" and "[r]eports or
8 metrics (e.g., voter satisfaction ratings, regulatory scores) justifying approval of 2020
9 election results." Section 16-452 authorizes the Secretary of State to create the Elections
10 Procedures Manual and imposes no duty on any of the Defendants to create the type of
11 records Plaintiff requested. *See* A.R.S. § 16-452.

12 For item two of PRR 1123, Plaintiff refers to Section 16-121 when requesting certain
13 reports provided to the Secretary of State. Here, Section 16-121 does require the creation
14 of reports. These reports were responsive public records to her request. And they were
15 provided to her by the Recorder's Office as indicated in an exhibit to Plaintiff's Complaint.
16 [*See* Ex. A at pdf 32]

17 For item three, Plaintiff refers to Section 16-121 when requesting "[p]rocesses and
18 reports used to maintain accurate voter lists, ensuring only eligible voters were included."
19 Section 16-121 defines the terms "qualified elector." *See* A.R.S. § 16-121. The statute
20 imposes no requirement for any Defendant to create reports. *See id.*

21 For item four, Plaintiff refers to Section 16-165 when requesting "[r]ecords of checks
22 to remove deceased voters from rolls, including any identified failures and corrective
23 actions." Section 16-165 requires a county recorder to cancel a voter registration under
24 certain circumstances, including when they are informed the registered individual is
25 deceased. A.R.S. § 16-165. No part of the statute requires the Recorder's Office to create

26 ⁴ Opinion freely available at
27 <https://www.casemine.com/judgement/us/59147995add7b049343fa787>

28 ⁵ Opinion freely available at
<https://www.casemine.com/judgement/us/5914be09add7b049347a5d62>

1 the records Plaintiff sought. *See* A.R.S. § 16-165.

2 For item five, Plaintiff refers to Section 16-166 when requesting “[d]ocumentation
3 of voter registration data reported to the Secretary of State, including compliance with
4 federal form requirements.” Section 16-166 outlines the procedure for a county recorder to
5 verify someone’s voter registration. *See* A.R.S. § 16-166. No part of the statute requires
6 the Recorder’s Office to create the records Plaintiff sought. *See* A.R.S. § 16-166.

7 For item six, Plaintiff does not refer to any statute when requesting “[e]vidence of
8 compliance with contract terms, including . . . [c]erification of Dominion’s
9 software/hardware by the Secretary of State [s]ource code escrow with the Secretary
10 of State [e]xplanation for strikethroughs in Runbeck/Dominion contract disaster
11 recovery language . . . and why new contracts were not initiated to address this gap” related
12 to 2020 Runbeck/Dominion contracts. No statute mandates any of the Defendants create
13 these types of records. It is possible public entities other than the Defendants hold these
14 records, but none of the Defendants do nor do they have a responsibility to seek them from
15 other entities.

16 The statutes Plaintiff cites to are clear—none require the Defendants to have the
17 additional records she seeks or to have ever created them in the first place. Accordingly,
18 Defendants are under no statutory obligation to have the records Plaintiff wishes existed.

19 B. Defendants have no duty to create responsive records.

20 It is also important to note that the Defendants have no duty to create any records in
21 response to Plaintiff’s public records requests. *See Lunney*, 244 Ariz. at 177, ¶ 19. Public
22 bodies only have a duty to search for the public records they have. *Am. Civ. Liberties Union*
23 *v. Ariz. Dep’t of Child Safety*, 240 Ariz. 142, 148, ¶ 14 (App. 2016).⁶

24 As Defendants have no duty to create public records in response to Plaintiff’s
25 requests, the Defendants do not have to create documents in response to Plaintiff’s wishes.

26 //

27 _____
28 ⁶ Opinion freely accessible at <https://caselaw.findlaw.com/court/az-court-of-appeals/2042262.html>

1 C. Plaintiff has received all responsive records.

2 Plaintiff was provided with the responsive records the Defendants have. She may
3 want other records, but those records either do not exist or, if the records do exist, the
4 records are not in the custody and control of the Defendants. No statute or other authority
5 requires the Defendants create the non-existent records Plaintiff wants or to try and obtain
6 responsive records from other entities. Therefore, the Defendants have produced to Plaintiff
7 all the public records subject to their control that are responsive to her public records
8 requests.

9 II. Defendants have no duty to provide an index or explain anything.

10 Plaintiff also claims that the Defendants have a duty to explain their production,
11 provide legal citations allowing the withholding of responsive public records, and state
12 whether no responsive records exist. She cites Sections 39-121.01(D) and (E) as support.
13 Plaintiff is incorrect.

14 A. Section 39-121.01(D)(2) does not apply to the Defendants.

15 Section 39-121.01(D)(2) provides that the custodian of records shall provide an
16 index of records or categories of records that have been withheld and the reasons why such
17 records are being withheld (hereafter referred simply as an “index”) from the production of
18 responsive public records, if requested. A.R.S. § 39-121.01(D)(2). This requirement is
19 only imposed on agencies. *Id.* The statute provides that the definition of “agency” is the
20 same as in Section 41-1001. *Id.*

21 Section 41-1001(1) expressly excludes “political subdivision[s] of this state or any
22 of the administrative units of a political subdivision . . .” from the definition of “agency.”
23 A.R.S. § 41-1001(1). The definition continues, stating an “agency” includes “any board,
24 commission, department, officer or other administrative unit created or appointed by joint
25 or concerted action of an agency *and* one or more political subdivisions of this state or any
26 of their units.” *Id.* (emphasis added).

27 Section 39-121.01(E) imposes no duty on any public body to create any index or
28 explain responses to public records requests. *See* A.R.S. § 39-121.01(E) (stating that a

1 public records request is denied if responsive public records are not produced or if an index
2 required under subsection 39-121.01(D)(2) is not provided).

3 Plaintiff incorrectly interprets Section 39-121.01(D)(2). While Section 39-
4 121.01(D)(2) creates a duty for agencies to provide an index upon request, the Defendants
5 are not included in the definition of “agency.” Section 41-1001(1) explicitly excludes
6 political subdivisions and the administrative units of political subdivisions from the
7 definition of an “agency.” Each of the Defendants is, therefore, excluded. Furthermore, no
8 Defendant is an administrative unit created by joint or concerted action of an agency and
9 political subdivision.

10 Furthermore, no Defendant has withheld any public records responsive to Plaintiff’s
11 public records requests. If no responsive public records are withheld, there is no index to
12 provide.

13 As Defendants are under no duty to provide Plaintiff with an index at all, Plaintiff’s
14 claim that it was improper for the Defendants to do so fails.

15 B. Defendants have no duty to explain.

16 Plaintiff repeatedly claims that Defendants failed to explain their work. Specifically,
17 she alleges the Defendants failed to “describe the scope of their work, identify custodians
18 consulted, identify systems or repositories searched, state the parameters used, certify
19 completeness of production, and certify the nonexistence of records.” [Plaintiff’s Brief at 6
20 (cleaned up)]

21 No statute requires the Defendants to explain their work to Plaintiff or provide any
22 certificates. Similarly to the non-existent records previously discussed, Plaintiff merely
23 wishes the Defendants did this, but they do not have to.

24 Furthermore, the Defendants did provide Plaintiff with some explanation. She was
25 informed that there were no MVD contracts related to her April 15th public records request.
26 For item one of her May 15th public records request, she was informed there were no
27 responsive records. For item two she was provided with the records. For items three and
28 four, she was informed she could find the processes she sought in the Elections Procedures

1 Manual. For item five, she was informed there were no responsive records and invited to
2 clarify. And for item six she was informed any responsive public record would be housed
3 with the Secretary of State.

4 Plaintiff may want additional explanations, descriptions, and certifications, but she
5 is not entitled to them. Plaintiff will be unable to point to any statute, case, or other authority
6 requiring the Defendants furnish her with this information, because none exists. Therefore,
7 Plaintiff's claim fails and she is not entitled to relief.

8 III. The Maricopa County Recorder's Office is a non-jural entity.

9 The Maricopa County Recorder's Office is a non-jural entity incapable of suing or
10 being sued. *See Sanchez v. Maricopa Cnty.*, 572 P.3d 101, 110, ¶ 27 (2025) (explaining
11 that the Maricopa County Sheriff's Office is incapable of suing or being sued).⁷ Therefore,
12 the Maricopa County Recorder's Office should be dismissed as a Defendant.

13 Public entities may only sue or be sued if the state legislature provides such power.
14 *Id.* The legislature has not provided the Maricopa County Recorder's Office with that
15 power. The Maricopa County Recorder's Office is an administrative entity so that the
16 Maricopa County Recorder may conduct the business of his office. *Id.* at 111, ¶ 31
17 (explaining the difference between the administrative office used to conduct the business of
18 a constitutional office and the constitutional office itself).

19 Accordingly, the Maricopa County Recorder's Office is incapable of being sued and
20 it is an improper party in this case.

21 **CONCLUSION**

22 For the reasons above, each of Plaintiff's claims fail and she is not entitled to any
23 relief. Defendants respectfully request the Court enter final judgment in their favor.

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⁷ Opinion freely available at <https://law.justia.com/cases/arizona/supreme-court/2025/cv-24-0013-pr.html>

1
2 RESPECTFULLY SUBMITTED this March 20, 2026.

3 RACHEL H. MITCHELL
4 MARICOPA COUNTY ATTORNEY

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10 *Attorneys for Maricopa County, Maricopa*
11 *County Recorder's Office, Office of*
12 *Procurement Services, Information*
13 *Governance Department, and the Maricopa*
14 *County Board of Supervisors*

15 ORIGINAL of the foregoing E-FILED
16 this 20th day of March 2026 with
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25 /s/ M. Delgado
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28

Affidavit of
Cynthia Zbiegien

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2 MARICOPA COUNTY ATTORNEY

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28 Defendants.

No. CV2025-063720

**CYNTHIA ZBIEGIEN'S RULE 80
UNSWORN DECLARATION UNDER
PENALTY OF PERJURY IN SUPPORT
OF DEFENDANTS' RESPONSE BRIEF**

(The Honorable Randall Warner)

1 Cynthia Zbiegien, for her affidavit, states as follows:

2 1. I am the Director of the Information Governance Department of Maricopa
3 County. I make these statements based on my personal knowledge and in support of the
4 Defendants' Response Brief.

5 2. The Information Governance Department is responsible for coordinating and
6 ensuring timely responses to public records requests submitted to various Maricopa County
7 departments and offices, including the Office of Procurement Services and the Elections
8 Department.

9 3. As Director of the Information Governance Department, I am responsible for
10 overseeing the process to ensure all public records requests are properly processed and
11 responded to in accordance with applicable requirements.

12 4. I have no responsibility over public records requests handled by the Maricopa
13 County Recorder's Office.

14 5. In my capacity as Director of the Information Governance Department, I was
15 responsible for overseeing the responses to Mrs. Weinbauer Martin's public records
16 requests.

17 6. In my capacity as Director of the Information Governance Department, I
18 ensured a diligent search was conducted for records responsive to Mrs. Weinbauer Martin's
19 public records requests.

20 7. Around April 15, 2025, Mrs. Weinbauer Martin submitted a public records
21 request to the Office of Procurement Services. This public records request was designated
22 as OPS Record # 719. Her public records request was a broad request for contracts related
23 to the 2020 election and for contracts from 2018, 2020, and 2024 for the Arizona Motor
24 Vehicle Division, Dominion, Runbeck, and first level signature verification temp agency
25 contracts. Plaintiff also asked how Arizona Revised Statute Section 16-452 was impacted
26 by these contracts.

27 8. On April 21, 2025, Mrs. Weinbauer Martin was informed that there were no
28 contracts with the Arizona Motor Vehicle Division.

1 9. On April 28, 2025, Mrs. Weinbauer Martin was provided with the public
2 records responsive to her request.

3 10. On May 15, 2025, Mrs. Weinbauer Martin submitted a public records request
4 to the Information Governance Department. This request was initially designated as IG
5 Record # 1123. Her request was for many different categories of records, and she
6 enumerated six 'items' of records she sought.

7 11. Due to different public entities being responsible for the public records Mrs.
8 Weinbauer Martin sought, IG Record # 1123 was split up. Items one and six of the request
9 were handled by the Elections Department and items two through five were forwarded to
10 the Maricopa County Recorder's Office. The public records request handled by the
11 Elections Department was designated as EC Record # 139.

12 12. After searching for responsive records, it was determined that the Elections
13 Department had no responsive records and the Elections Department informed Mrs.
14 Weinbauer Martin of this fact.

15 13. No responsive public records have been withheld from Mrs. Weinbauer
16 Martin.

17 14. Mrs. Weinbauer Martin has been provided with all public records responsive
18 to her public records requests.

19
20 Pursuant to Arizona Rule of Procedure 80(c), I declare under penalty of perjury that
21 the foregoing is true and correct.

22 Executed on March 13, 2026.

23
24 BY: /s/ Cynthia Zbiegien
25 CYNTHIA ZBIEGIEN
26
27
28

Affidavit of
Lori Wilson

1 RACHEL H. MITCHELL
2 MARICOPA COUNTY ATTORNEY

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No. CV2025-063720

**LORI WILSON'S RULE 80 UNSWORN
DECLARATION UNDER PENALTY OF
PERJURY IN SUPPORT OF
DEFENDANTS' RESPONSE BRIEF**

(The Honorable Randall Warner)

1 Lori Wilson, for her affidavit, states as follows:

2 1. I am the Public Records Officer for the Maricopa County Recorder's Office.

3 2. I am responsible for handling all public records requests submitted to the
4 Recorder, including searching for and producing responsive public records.

5 3. On May 15, 2025, the Information Governance Department forwarded to me
6 part of a public records request they received since some of the responsive records, if any,
7 would be held by the Recorder's Office.

8 4. I labeled the public records request as Request # 25-64.

9 5. In Request # 25-64, Mrs. Weinbauer Martin requested four different
10 categories of records, which were categories two through five of the original request. The
11 second category requested reports submitted to the Secretary of State on voters registered
12 without proof of citizenship, including ballots cast for federal offices only. The third
13 category was for processes and reports used to maintain accurate voter lists that ensured
14 only eligible voters were included. The fourth category were for records of checks to
15 remove deceased voters from the rolls and also requested any identified failures and
16 corrective actions. Lastly, her fifth category was for documentation of voter registration
17 data reported to the Secretary of State and for compliance with federal forms.

18 6. I conducted a search for any public records responsive to Mrs. Weinbauer
19 Martin's public records request.

20 7. I found public records responsive to the second category of requests sought
21 by Mrs. Weinbauer Martin, reports the Recorder's Office submitted to the Secretary of State
22 on voters registered without proof of citizenship.

23 8. I informed Mrs. Weinbauer Martin that I would provide her with the
24 responsive public records to the second category through a secure link. For categories three
25 and four, I directed her to the Elections Procedures Manual. For the fifth category, I
26 informed her that there was no statutory duty to report and asked for clarification on any
27 specific report she was requesting.

28 9. I sent a secure link to Mrs. Weinbauer Martin's personal email address for her

1 to access the responsive records.

2 10. I received an automated notice that the secure link was accessed several times.

3 11. I provided Mrs. Weinhauer Martin with all responsive records I found after
4 conducting a search based on her public records request. No responsive public records have
5 been withheld from her.

6
7 Pursuant to Arizona Rule of Procedure 80(c), I declare under penalty of perjury that
8 the foregoing is true and correct.

9 Executed on March 12, 2026.

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11 BY: /s/ Lori Wilson
12 LORI WILSON
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