

DECLARATION OF JACQUELINE ONIGKEIT

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

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

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

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

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

19. The first week I worked about thirty-five (35) hours over five days. I processed about 1,500 ballots per day, and about 7,500 ballots the first week. The rejection rate was about 25-30%, so about 1875 to 2,250 ballots were rejected by me this first week.
20. The second week I worked about sixty (60) hours per week for six days. I processed about 1,750 ballots per day, and about 10,500 ballots the second week. The rejection rate was about 25-30%, so about 2,625 to 3,150 ballots were rejected by me this second week.
21. The third week I worked about sixty (60) hours per week for seven days. I processed about 1,750 ballots per day, and about 12,250 ballots the third week. The rejection rate was about 35-40%, so about 4,287 to 4,900 ballots were rejected by me this third week.
22. The fourth week I worked about sixty (60) hours per week for seven days. I processed about 1,750 ballots per day, and about 12,250 ballots the fourth week. The rejection rate was about 35-40%, so about 4,287 to 4,900 ballots were rejected by me this fourth week.
23. The total ballots I processed for signature verification over four weeks was about 42,500, and the total ballots I rejected was about 13,074 to 15,200.
24. The fifth week we only worked Monday, Tuesday, and Wednesday but I only cured ballots and did not perform signature verification the fifth week.

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

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

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

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

Signed: 
Jacqueline Onigkeit

Date: 12/6/22