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**DECLARATION OF CHRISTOPHER J. ROADS**

I, Christopher J. Roads, declare that the following is true and accurate and based on my personal knowledge, except those statements which are based on information and belief:

1. I am the Chief Deputy Recorder and Registrar of Voters for Pima County. I have been the registrar of voters for Pima County since June, 1999, and the Chief Deputy Recorder for Pima County since April, 2004. In my capacity for both positions, I am the senior manager overseeing the day-to-day operations of the Recorder's Office and report directly to the elected Pima County Recorder, F. Ann Rodriguez.
2. This declaration is being prepared in response to the State of Arizona's interrogatories in the case of Arizona Democratic Party v. Hobbs, 2020 CV 01143-DLR.
3. In Pima County, election tasks are divided between different departments. The Pima County Elections Department is responsible for candidate nomination petitions, campaign finance reports, ballot design, precinct boundary determinations, polling place selection, poll worker recruitment, hiring and training, ballot design, the operation of the polling places, tabulation of ballots and the preparation of the official canvass of the election.
4. The Pima County Recorder's Office is responsible for maintaining the Pima County Voter Registration roll, mailing and validating early ballots, the preparation of the poll rosters and precinct registers and the processing of provisional ballots. While I am familiar with a number of the Elections

1 Department processes and procedures, this declaration is based only on the  
2 activities of the Recorder's Office.

- 3 5. We include an instruction sheet with every early ballot sent to a voter by  
4 mail. That instruction sheet includes directions to the voter to sign their early  
5 ballot affidavit. The mailing envelope that is included in the ballot package  
6 includes reminder notices on the side of the envelope with the adhesive flap.  
7 Included as one of the reminders is the direction for the voter to sign their  
8 affidavit. Both instructions are in English and Spanish.
- 9 6. For each election, we prepare written instructions to staff as to the exact  
10 procedures to follow for each ballot handling task. The instructions are  
11 revised before each election cycle and workers assigned to the task must  
12 attend a training class prior to performing the task in each election. The  
13 written instructions to staff for the 2020 General Election have not yet been  
14 written and will not be written until a few weeks before the election cycle  
15 begins. Absent a court order directing otherwise, we do not anticipate  
16 making any changes to our procedures for processing early ballots during the  
17 2020 general election cycle compared to the processes we followed in 2018  
18 and 2019. A number of the processes have not significantly changed in a  
19 number of years.
- 20 7. Each day during the election cycle our office sends two couriers to the main  
21 United States Postal Service processing plant in Tucson to pick up any  
22 inbound voted ballots. The ballots are then immediately transported to the  
23 Pima County Recorder's Office Ballot Processing Center. We have a  
24 standard pick-up time scheduled with the Postal Service of 9:00 a.m. each  
25 weekday. The ballots generally arrive at the Ballot Processing Center by  
26 9:30 a.m.

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8. Any Pima County voter may also drop off their voted early ballot at any of our walk-in early voting sites. Ballots dropped off at a walk-in site are regularly picked up by couriers and transported to the Ballot Processing Center. Ballots dropped off at the sites are processed the same way as ballots picked up at the post office.
9. In Pima County, we provide voters with a separate mailing envelope along with the Early Ballot Affidavit envelope in order to protect the confidentiality of the voter's information. Once the ballots arrive at the Ballot Processing Center, the first step in processing the ballots is to open the mailing envelope and remove the contents of that envelope. The contents generally consist of the Early Ballot Affidavit Envelope that contains the voter's voted ballot. Workers performing that task are instructed to immediately examine the Early Ballot Affidavit envelope to confirm that the envelope is sealed, contains something that feels like a ballot, does not show any indications that the envelope has been tampered with and contains a signature on the affidavit envelope. If the affidavit envelope shows no signs of tampering, feels like it contains a ballot and has a signature it is sent for further processing. If any problems are detected, including an affidavit with a missing signature, the affidavit is immediately set aside for further processing by what we refer to as our Problem Ballot Team. Our staff have normally completed the opening and inspection process by early afternoon on the day that the ballots have been received that morning.
10. Our problem ballot team generally consists of 7 to 11 workers depending on the amount of early voting activity in the election cycle. During the time period when the mailing envelope is opened and the affidavit is inspected, the Problem Ballot Team members or a supervisor gather any problem ballots

1 from the mail opening team. If the problem discovered is a missing  
2 signature, a problem ballot team member will immediately enter a request  
3 for a replacement ballot for the voter in the computer system. We then enter  
4 the voter's information into a tracking program and prepare a letter to the  
5 voter notifying them that they will be receiving a replacement ballot in the  
6 mail. The letter also informs the voter as to why the replacement ballot is  
7 being sent and the deadlines for returning the replacement ballot. That letter  
8 is prepared the same day that the unsigned ballot arrives in our office and is  
9 taken directly to the main postal processing plant in Tucson that afternoon.  
10 That post office is open during evening hours each weekday.

- 11 11. We use a third party vendor to print and assemble our early ballot packages.  
12 The data to the vendor is uploaded at approximately 3:00 p.m. each workday.  
13 The vendor will then print the replacement ballot materials, assemble the  
14 packages and deliver the replacement ballots to the post office either the next  
15 business day or no later than the second business day after the data is  
16 uploaded.
- 17 12. The original unsigned ballot affidavit is marked as invalid by our problem  
18 team and placed in the ballot storage room.
- 19 13. The procedures listed above are followed in every election from the first day  
20 that we start receiving voted ballots until the Thursday immediately before  
21 Election Day. Once we have reached the Thursday prior to Election Day it  
22 is generally too late for a voter to receive and return a replacement ballot by  
23 mail. Instead of issuing a replacement ballot to the voter, the problem team  
24 will attempt to contact the voter by phone and/or email if we have that  
25 information in the record. If we do not reach the voter directly, we will also  
26 send a text message notifying the voter that there is a problem with their early

1 ballot and ask the voter to contact our office as soon as possible. A letter  
2 asking the voter to contact our office is also mailed until the Friday prior to  
3 Election Day. If the team is able to reach the voter, the voter is notified that  
4 the unsigned ballot affidavit cannot be processed. The voter is advised to go  
5 to any walk-in early voting site or emergency voting location in Pima County  
6 to vote a replacement early ballot in person or to go to their assigned polling  
7 place on Election Day to vote a provisional ballot. The Problem Ballot Team  
8 members track all efforts made to contact the voter and if the contact was  
9 successful, notes are taken as to the substance of the conversation. This  
10 procedure is followed for all unsigned early ballot affidavit envelopes we  
11 receive between the Thursday prior to Election Day and the close of business  
12 on the day before Election Day. During that period, our office regularly  
13 works on the weekend and the problem ballot team continues its efforts  
14 during that entire time period. During the 2020 General Election cycle, all  
15 but two of our walk-in early voting sites will be open for Emergency voting  
16 on the Saturday prior to Election Day and on the Monday, the day before  
17 Election Day. A number of our walk-in voting sites will also be open during  
18 evening hours until 7:00 p.m. at least two nights during the final week.

19 14. The Pima County Recorder's Office was the first office in Arizona to make  
20 efforts to allow a voter to confirm their questioned signature on an early  
21 ballot affidavit envelope after Election Day. We do not refer to the process  
22 as "curing" the signature. We simply ask the voter to confirm that the  
23 signature on the affidavit is their signature or if the voter was assisted by  
24 another individual (and that individual signed the affidavit) that the voter was  
25 not able to mark the ballot themselves but requested the assistance of the  
26 other person and that the ballot was marked according to their direction. We

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do not allow a voter to alter an early ballot affidavit once it has been received in our office. During general election cycles, we will process between 350,000 and 450,000 early ballot affidavits during the 28-day early voting cycle.

15. The Pima County Recorder's Office has never allowed a voter to sign an affidavit after Election Day. I do not believe any county in Arizona has ever allowed that to occur. We consider an unsigned early ballot to be incomplete and invalid under Arizona law.

16. The Pima County Ballot Processing Center is located near the intersection of Country Club Road and Valencia Road near the Tucson International Airport. The early ballots are processed in that location and the Problem Ballot Team works directly in that facility. The most common problem ballot issue involves a questioned signature on an early ballot. The procedure for dealing with that issue is for a team member to attempt to call the voter. If they cannot reach the voter by phone, an email and a text message is sent. If the voter does not respond immediately a letter is sent to the voter asking them to contact our office. If the voter does not respond within one week, we repeat the phone call attempts, emails and texting. We do not routinely send replacement ballots to voters with questioned signatures unless we make contact with them and they confirm they did not sign the affidavit.

17. The most common signature comparison issues occur with voter registration forms originating at Motor Vehicle Department Offices. Almost 70% of voters in Pima County submit registration forms through MVD. Individuals sign on an electronic pad at an MVD office but sign their early ballot affidavit with a pen. There are significant differences in the writing between the two methods. During major election cycles the Problem Team will process 5,000

1 to 6,000 questioned signatures and can make as many as 10,000 phone calls.  
2 In the days immediately following an election the problem ballot team is  
3 busy making final attempts to contact voters with questioned signatures.

4 18. Immediately after Election Day the rest of the staff are processing early  
5 ballots that were dropped off at the polls and provisional ballots. In a  
6 presidential general election we can receive as many as 25,000 to 35,000  
7 early ballots dropped off at the polls. We generally receive between 15,000  
8 and 25,000 provisional ballots in each general election. The most common  
9 reason for a voter to receive a provisional ballot at the polling place is  
10 because the voter received an early ballot and did not vote it. We must  
11 complete processing early ballots before we can process provisional ballots  
12 to ensure that a provisional ballot voter did not also drop off their early ballot.  
13 By state law, we must complete the validation process for all provisional  
14 ballots within 10 calendar days after Election Day. For the past several  
15 general election cycles the Pima County Recorder's Office has completed  
16 the provisional ballots on that 10<sup>th</sup> day.

17 19. The Plaintiffs have requested that the court order counties to allow a voter to  
18 sign their early ballot affidavit during the same post-election period as  
19 permitted to voters to confirm the existing signature on affidavits. The only  
20 way that this can occur is for the voter to travel to the Ballot Processing  
21 Center, for our staff to locate the particular ballot in the ballot room, to bring  
22 the ballot to the voter in the lobby and have them sign it. Our procedures  
23 require that two workers with different political party affiliations be present  
24 whenever a ballot is being handled. This will result in substantially more  
25 effort than occurs for a voter to confirm their signature. A voter can simply  
26 call our office to confirm their signature.

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20. Pima County is the 15<sup>th</sup> largest geographical county in the United States consisting of 9,189 square miles. The Tucson metropolitan area is at the eastern end of the county. Voters living in Ajo, Lukeville or in many areas on the Tohono O’odham Nation would be required to travel up to 100 miles or more to get to the Ballot Processing Center to sign their ballot. Voters living on the southern edge of the county would be required to travel up to 60 miles to arrive there. Voters living in the Towns of Marana or Oro Valley at the northern end of the metropolitan area would need to travel 20 to 30 miles to arrive at the Ballot Processing Center. Pima County is not the largest geographical county in Arizona.
21. Only a very small percentage of voters in Pima County fail to sign their early ballot affidavit. Most of those are issued replacement ballots or are able to go to a walk-in site, emergency voting site or to their polling place on Election Day.
22. The voter assistance programs we will implement during the 2020 General Election cycle are still being developed. Difficulties caused by the COVID-19 virus have required significant changes to our planned procedures.
23. In past elections, we would provide special election boards (referred to in Pima County as Team Voting) pursuant to A.R.S. § 16-549(A) for individuals who were confined to nursing homes, rehabilitation centers, pre-trial detainees or those serving misdemeanor jail sentences and those in hospitals and other similar facilities. However, many of those facilities are not permitting individuals from outside to enter the facilities. We have therefore contacted as many facilities in Pima County that we could identify to request their assistance in making certain that voters in the facilities are registered prior to the cutoff date, those that wish to receive a ballot can

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receive a ballot by mail and that someone will be available inside the facility to assist the voter with marking the ballot when necessary.

24. The Pima County Recorder's Office regularly provides ballots in both large print and in braille when requested.

25. The Pima County Recorder's Office has outreach workers for both of the Native American communities in Pima County, the Tohono O'odham Nation and the Pascua Yaqui Tribe. The outreach workers have been involved in a number of community activities with the Native American population in providing education on methods of voting including attending in person meetings and public service announcements broadcast on radio stations owned by both of the Native American Tribes.

26. We will be operating walk-in early voting sites near both Native American communities and our outreach workers will be among the staff at those sites.

27. The Recorder's Office has a number of workers who are fluent in Spanish for both phone calls and walk-in issues.

28. For voters who are hearing impaired we have workers available to communicate in American Sign Language either in person or through video communication. We have also used a third-party vendor to set up video conferencing interpretation services when needed.

29. During the 2020 General Election cycle, we will be operating 14 walk-in early voting sites throughout Pima County. 13 of those sites will be able to issue ballots to any voter. The one site that will be for limited voter access is located in Ajo, Arizona and serves only the four westernmost precincts. Each of the full service walk-in voting sites will be equipped with an Express Vote ballot marking device that allows a number of voters with physical limitations to mark an early ballot without assistance.

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30. In order to reduce the spread of COVID-19, the Pima County Board of Supervisors has enacted a requirement that all individuals over age 5 wear a mask while in public and have required masks to be worn in all county facilities. Temperature taking requirements are also in effect in a number of county facilities including several of the walk-in early voting sites.

31. We have always allowed curbside voting at our walk-in early voting sites for individuals who cannot physically enter the walk-in voting site. During the 2020 elections, we will be providing curbside ballot drop off sites at most of our walk-in sites so that voters may drop off their mailed ballot without getting out of their car. We will also be setting up two voting booths outside each walk-in site location in the metropolitan area for voters who either are running a fever over 100.4 or who refuse to have their temperature taken or refuse to wear a mask. Their ballot will be brought outside to them to allow them to vote at the site.

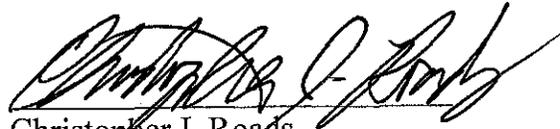
32. The Pima County Recorder's Office has significantly increased its public outreach through social media accounts including Face Book, Twitter, Instagram, and Nextdoor. Videos of a number of our activities are also being posted on YouTube with links on our website. Our website is being redesigned and the new upgraded site is expected to be deployed within the next couple of weeks to be mobile friendly as well as to enhance viewing options by individuals with some physical limitations.

33. To my knowledge, we have not received any complaints from voters regarding communication issues due to either language considerations or

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access issues for individuals with physical limitations for any of our early voting activities.

Dated this 11<sup>th</sup> day of July, 2020



Christopher J. Roads  
Chief Deputy Recorder  
Registrar of Voters  
Pima County Recorder's Office