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Attorneys for Plaintiff

# IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF YUMA

STATE OF ARIZONA,

Plaintiff,

٧.

GUILLERMINA FUENTES,

Defendant.

Case No: 51400 CR 2021 - 01029

89 SGJ 4

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: CONSPIRACY, a Class & 4 Felony, in violation of A.R.S. § 13-1003

**COUNT 2: BALLOT ABUSE**, a Class 5 Felony, in violation of A.R.S. §16-1005(A)

COUNT 3: FORGERY, a Class 4 Felony, in violation of A.R.S. §13-2002(A)(1)

COUNT 4: BALLOT ABUSE, a Class 5 6 Felony, in violation of A.R.S. §16-1005(H)

The 89<sup>th</sup> Arizona Grand Jury accuses **GUILLERMINA FUENTES**, charging on this 13<sup>th</sup> day of September, 2021, that in or from Yuma County, Arizona:

### COUNT 1 CONSPIRACY

On or about August 4, 2020, GUILLERMINA FUENTES, with the intent to aid the commission of an offense, did agree with one or more persons that at least one of them would engage in conduct constituting the offense and one of the parties committed an overt act in furtherance of the offense, in violation of A.R.S. §§ 13-1003, 13-2002(A)(1), 13-2002(A)(3), 13-2001, 16-1005(A), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

Said conduct occurred when GUILLERMINA FUENTES with the intent to aid the commission of an offense, did agree with one or more persons that at least one of them would engage in conduct constituting the offense and one of the parties committed an overt act in furtherance of the offense, namely FORGERY and BALLOT ABUSE, by conspiring to obtain and vote the early ballot of and to deposit it for tallying in the August 2020 Primary Election.

#### <u>COUNT 2</u> BALLOT ABUSE

On or about August 4, 2020, GUILLERMINA FUENTES knowingly marked a voted or unvoted ballot or ballot envelope with the intent to fix an election for that person's own benefit or for that of another person, in violation of A.R.S. §§ 16-1005(A), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

Said conduct occurred when GUILLERMINA FUENTES marked the early ballot of at the August 2020 Primary Election.

#### COUNT 3 FORGERY

On or about August 4, 2020, **GUILLERMINA FUENTES** falsely made, completed or altered a written instrument, in violation of A.R.S. §§ 13-2002(A)(1), 13-2001, 16-547, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

Said conduct occurred when GUILLERMINA FUENTES knowingly signed the name of a conduct occurred when GUILLERMINA FUENTES knowingly signed the

## COUNT 4 BALLOT ABUSE

On or about August 4, 2020, GUILLERMINA FUENTES knowingly collected voted or unvoted early ballots from another person, in violation of A.R.S. §§ 16-1005(H), 16-1005(I), 16-1021, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

Said conduct occurred when **GUILLERMINA FUENTES** possessed approximately four early ballots for the August 2020 Primary Election.

Pursuant to A.R.S. § 21-425, the Grand Jurors find that the offenses described above were committed in Yuma County, Arizona.

True Bill")

MARK BRNOVICH ATTORNEY GENERAL STATE OF ARIZONA

Dated: 4/13/2

TOID C. LAWSON Assistant Attorney General Foreperson of the Grand Jury

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