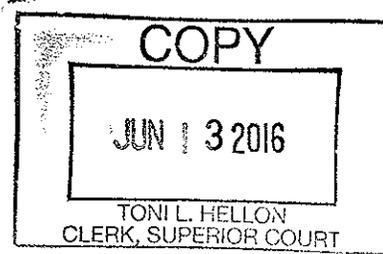


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6 **IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA**

7 **IN AND FOR THE COUNTY OF PIMA**

8
9 **BETTY VILLEGAS,**

10 Plaintiff,

11 v.

12 **EDNA SAN MIGUEL, Real Party in Interest;**
13 **MICHELLE REAGAN, in her official capacity as**
14 **Arizona Secretary of State; F. ANN RODRIGUEZ,**
15 **in her official capacity as Pima County Recorder;**
16 **BRAD NELSON, in his official capacity as Pima**
17 **County Elections Director; SUZANNE SAINZ in**
18 **her official capacity as Santa Cruz County**
19 **Recorder; HELEN PURCELL, in her official**
20 **capacity as Maricopa County Recorder; VIRGINIA**
21 **ROSS in her official capacity as Pinal County**
22 **Recorder; POUQUETTE STALLWORTH in her**
23 **official capacity as Yuma County Recorder; Pima**
24 **County Board of Supervisors, and its members in**
25 **their official capacity; Pinal County Board of**
26 **Supervisors, and its members in their official**
capacity; Maricopa County Board of Supervisors,
and its members in their official capacity; Santa
Cruz County Board of Supervisors, and its
members in their official capacity; and Yuma
County Board of Supervisors, and its members in
their official capacity

Defendants.

Case No.: **C 20162728**

VERIFIED STATUTORY ACTION
FOR INJUNCTION PURSUANT TO
A.R.S. § 16-351(A)

(Election-related: Nomination
petition signature challenge)

SARAH R. SIMMONS

1 Plaintiff Betty Villegas, an elector of Pima County, Arizona, hereby alleges the
2 following:

3
4 1. The Superior Court of the State of Arizona in and for the County of Pima has original
5 jurisdiction of this matter pursuant to A.R.S. § 16-351 et. seq: A.R.S. § 16-311 and the Arizona
6 Constitution, Article 6, § 14.

7 2. The individual defendant and real party in interest Edna San Miguel has filed nominating
8 petitions as a candidate for election at the Republican primary election to be held on August 30,
9 2016 for the office of U.S. Representative for Congressional District 3 for the State of Arizona.
10 (Exhibit A.) The Arizona Secretary of State's official website states that San Miguel filed 1090
11 signatures. (Exhibit B.)

12
13 3. Pursuant to A.R.S. § 16-351(C), indispensable party defendants include: the Pima County
14 Board of Supervisors; the Santa Cruz County Board of Supervisors; the Pinal County Board of
15 Supervisors; the Maricopa County Board of Supervisors; the Yuma County Board of
16 Supervisors; F. Ann Rodriguez in her official capacity as the Pima County Recorder; Suzanne
17 Sainz, in her official capacity as Santa Cruz County Recorder; Brad Nelson, Pima County's
18 Election Division Director; Pouquette Stallworth, in her official capacity as Santa Cruz County
19 Recorder; Virginia Ross in her official capacity as Pinal County Recorder; Helen Purcell in her
20 official capacity as Maricopa County County Recorder; and Michelle Reagan, in her official
21 capacity as Arizona Secretary of State, as the party to whom the nominating petitions at issue are
22 submitted. These Defendants are named solely in their official capacity and who, in such official
23 capacity, have the statutory and administrative duty of determining those legally qualified
24 candidates to be placed upon the official election ballot and the printing of those ballots.
25
26

1 4. Plaintiff, Betty Villegas, is a duly qualified elector, who resides in Pima County, Arizona.

2 5. Defendant San Miguel failed to file the required number of valid nominating signatures
3 to seek the office of U.S. Representative, Congressional District 3, for the State of Arizona.

4 6. A.R.S. § 16-322(a)(2) provides that in order for an individual to be placed upon the ballot
5 for the office of U.S. Representative for Congressional District 3 for the State of Arizona, said
6 elector must file valid nominating petitions containing signatures of at least one-half of one
7 percent but not more than ten percent of the total number of qualified signers in the district from
8 which such representative shall be elected.

9
10 7. The Arizona Secretary of State published official candidate information stating eight
11 hundred sixty four (864) valid nominating signatures are required to seek the Republican
12 nomination for U.S. Representative in Congressional District 3 in 2016. On information and
13 belief, Plaintiff alleges eight hundred sixty four (864) valid signatures are required. (Exh. C.)

14 8. Edna San Miguel's challenged nominating petitions are attached hereto as Exhibit "E" to
15 this Complaint. (Exhibit E.) The Arizona Secretary of State's website states San Miguel filed
16 one thousand ninety (1,090) signatures. (Exhibit B.) On information and belief, the overall
17 number of signatures on San Miguel's petitions are two thousand one hundred thirty (2,130).
18

19 9. Pursuant to A.R.S. 16-351(A), Exhibit "D", attached hereto, contains an affidavit listing
20 the petition number, the line number and the basis for the challenge to each signature being
21 individually challenged. The basis for the challenges to individual signatures is stated in Exhibit
22 D, which is incorporated herein by the reference as if fully set forth herein. (Exhibit D.)
23

24 10. An examination of the petitions San Miguel filed with Arizona Secretary of State reveals
25 the following: **There are one thousand six hundred fifty three (1,653) invalid signatures.**
26

1 The description of the individual signature challenges are explained below, and set forth in detail
2 in Exhibit D, which is incorporated here by reference. (See Exhibit D and Exhibit E.)

3 11. Even if San Miguel filed two thousand one hundred thirty signatures (2,130) on her
4 petitions, after deducting the one thousand six hundred fifty three (1,653) invalid signatures, San
5 Miguel is left with only four hundred seventy seven (477) valid signatures, which is far below
6 the eight hundred sixty four (864) valid signatures required by law.

7 12. Plaintiff challenges signatures on Pima County petitions on the basis that: **1,081** signatures
8 are from signers who do not reside in Congressional District 3, **121** signatures are from a party
9 other than Republican or independent, **120** signatures as not registered, **30** signatures are on
10 duplicate petitions plus **2** signatures on duplicate petitions are not on numbered lines, **47** do not
11 have a date of signing, **10** are invalid because the circulator did not sign the petition, **9** did not
12 sign at an address that was registered when signing, **12** listed a different county that did not
13 match the petition, **9** listed non-matching county information, **1** is a convicted felon, **89** are
14 invalid on eleven defective petitions due to listing of wrong and non-existent county information
15 in the preamble, or because the circulator altered the Petition at some point and also scratched
16 out the prior county, and **122** are invalid because of fifteen defective petitions due to false,
17 incorrect or lack of county information on the back-page circulator area. (Exhs. D and E.)

18 13. A.R.S. § 16-321(B) requires that all signatures on a nomination petition shall be a voter
19 who at the time of signing is a registered voter in Congressional District 3, the electoral district
20 of that office of U.S. Representative. Signatures under the category of being “Out of District
21 Signatures” and “Signatures not Registered” and ... not registered at the listed address” and are
22 not valid signatures pursuant to that section. (Exhs. D & E.)
23
24
25
26

1 14. A.R.S. §§ 16-321(D) and (F) require that all signatures must be from qualified electors
2 registered as members of the Republican Party for this partisan primary, or independents.

3 Plaintiff challenges all signatures of Democratic and Libertarian or Green Party registered
4 signers. (Exhibits D and E.)

5 15. Plaintiff challenges signatures on multiple entire petitions for defects on the circulator's
6 affidavits therein as containing false and/or erroneous information as to county of residence, as
7 violating the requirements of A.R.S. § 16-315, and § 16-321(A). (See Exhibits D and E.)

8 16. Plaintiff challenges the signatures on multiple entire petitions for defects on the preamble
9 with regard to stating false, erroneous and/or non-existent "county" information for which those
10 Petitions were circulated, or where the circulator altered the Petition at some point and scratched
11 out the prior county listed, etc., as violating A.R.S. § 16-315, and § 16-321(A). (Exhs. D and E.)

12 17. Plaintiff challenges one signer who is a felon and thus is an improper signer, and signers
13 who are not registered on the rolls of the Pima County Recorder, signers "purged" and "cancelled"
14 from the voting rolls, and all of whom and any others who were not qualified to vote as of the
15 date of signing. (See Exhibits D and E.)

16 18. Plaintiff challenges signatures where the date of signing was not entered on the Petitions
17 in violation of A.R.S. § 16-315 and A.R.S. § 16-321(A). (See Exhibits D and E.)

18 19. Plaintiff challenges signatures not signed on numbered lines on the petitions, as outside
19 the form, and in violation of the requirements of A.R.S. § 16-315 and A.R.S. § 16-321(A), which
20 is required for the purpose of verification, identification and challenge. (See Exhibits D and E.)

21 20. Plaintiff challenges signatures on the basis that they do not contain date of signing, as
22 required under A.R.S. § 16-315 and § 16-321(A). (See Exhibits D and E.)

23 21. Plaintiff challenges all signatures whose listed county does not match the stated "county"
24
25
26

1 information in the preamble for which the petitions were circulated. (See Exhibits D and E.)

2 22. Plaintiff challenges all signatures on one Petition which was not signed by the circulator.
3 (See Exhibits D and E.)

4 23. First, one thousand eighty one (1,081) signatures are invalid because they are of persons
5 who are not residents of Congressional District 3. Of this category of invalid signatures, one
6 thousand sixty six (1,066) of these invalid signatures are listed below in "Table A: Out of
7 District Signatures On Numbered Petition Lines." (See also Exhibits D and E.)

8
9 An additional fifteen (15) invalid out-of-district signatures are located above the signature
10 section on the following petitions, but were not signed on numbered lines as required, thus
11 making it impossible to cite a line: Petition 0014; Petition 0028; Petition 0032; Petition 0034;
12 Petition 0035; Petition 0067; Petition 0084; Petition 0093; Petition 0098; Petition 0118; Petition
13 0122; Petition 0132; Petition 0192; Petition 0207; and Petition 0212. (Exhibits D and E.) These
14 fifteen (15) signatures are also invalid for failing to be written on a numbered lines, as required.
15

Table A: Out of District Signatures (On Numbered Petition Lines).		
Petition No. & line numbers	Petition No. & line numbers	Petition No. & line numbers
No. 0001, line 1,8;	No. 0069, lines 2,3,4,5,6,8,10;	No. 0140, lines 1 - 6, 8, 9, 10;
No. 0002, lines; 1, 2, 5, 8, 9, 10;	No. 0070, lines 1,2,3,5,6,7,10;	No. 0141, lines 1,3;
No. 0003, lines; 4,5,9,10.	No. 0071, lines 1,2,3,4,6,9;	No. 0142, lines 6;
No. 0004, lines 1 - 10;	No. 0072, lines 1 - 10;	No. 0144, lines 7,8;
No. 0005, lines 1,2,4,5,6,8,9;	No. 0073, lns. 1,3,4,5,6,8,9,10;	No. 0145, lines 8;
No. 0006, lines 1 - 10;	No. 0074, lines 1 - 10;	No. 0148, lines 1,2;
No. 0007, lines 1,3,2,4,6,7,10;	No. 0075, lns. 2,3,4,5,7,8,9,10;	No. 0150, lines 6;
No. 0008, lines 3,5,4,6,7,8,9;	No. 0076, lines 1 - 10;	No. 0151, lines 3,8;
No. 0009, lines 1,2,3,7;	No. 0077, lines 2,3,5,6,8,9;	No. 0153, lines 1,2,4,5;
No. 0010, lines 1,2,4;	No. 0078, lines 1 - 10;	No. 0154, lines 1,4,5,6,9;
No. 0012, lines 2,3;	No. 0079, lines 1, 3 - 10;	No. 0155, lines 3,4,5,6,7;
No. 0013, lines 1,3,4;	No. 0080, lines 1,2,5,6,7,8,9;	No. 0156, line5;
No. 0014, lines 1,3,4,5,6,7	No. 0081, lines 1,2,3,6,7,9;	No. 0158, lines 3,6,7,8,9;
No. 0015, lines 3,6;	No. 0082, lines 1,6,9,10;	No. 0160, lines 2;
No. 0017, lines 1,2;	No. 0083, lines 1,3,6,7,8,9;	No. 0162, lines 1,8;
No. 0019, lines 2,4;	No. 0084, lines 1,2,3,5,6,9;	No. 0163, lines 1-7, 10;
No. 0022, lines 1,3,4,5,6,7,8;	No. 0085, lines 1,10;	No. 0165, lines 3,4,5;
No. 0023, lines 1 - 10;	No. 0087, lines 2,6,8,10;	No. 0166, lines 1,2,5,8;

1	No. 0024, lines 2,3,4,5,6,7,10; No. 0025, lines 3,4,6,7,10;	No. 0088, lines 2,5,6,7,8,9,10; No. 0090, lines 8;	No. 0167, lines 3,5,6,8,9; No. 0168, lines 1-8, 10;
2	No. 0026, lines 2,3,4,5,6,7; No. 0027, lines 1,2,3,7;	No. 0091, lines 5; No. 0092, lines 1 -8, 10;	No. 0170, lines 1,6,7,8; No. 0171, lines 3,7,8;
3	No. 0028, lines 1,2,3,6,7,8,9; No. 0029, lines 2,3,4,5,6,7,8,9;	No. 0093, lines 2,3,5,6,7,10; No. 0094, lines 1-4, 6-8, 10;	No. 0172, lines 5; No. 0173, lines 8;
4	No. 0030, lines 1,2,4,9; No. 0031, lines 1,2,3,4,5;	No. 0095, lines 1,2,4 - 10; No. 0096, lines 1, 4-10;	No. 0174, lines 4,9; No. 0175, lines 10;
5	No. 0032, lines 1,7,8,9,10; No. 0033, lines 1,2,3,4,5,7,9;	No. 0097, lines 1 - 10; No. 0098, lines 1,2,4,5,6,7,8;	No. 0176, lines 1,2,3,4,6,9; No. 0177, lines 7;
6	No. 0034, lines 1,2,3,6,7,8; No. 0035, lines 1,3,4,6,7,9,10;	No. 0099, lines 1-4, 6-10; No. 0100, lines 1,2,6,7,8,10;	No. 0178, line 4; No. 0179, lines 2,8,9,10;
7	No. 0036, lines 1 - 9; No. 0037, lines 1, 3 - 10 ;	No. 0101, lines 1, 2, 4, 5-10; No. 0102, lines 2,4,5,6,7,8,9;	No. 0180, lines 1,3,8,9; No. 0181, lines 1,7;
8	No. 0038, lines 4,5,6,7,8,10; No. 0039, lines 1,3,4,5,7,8,9,10;	No. 0103, lines 1-6, 8, 10; No. 0104, lines 2,3,4,6,7,9;	No. 0182, lines 1; No. 0183, lines 6,7;
9	No. 0040, lines 1,4,7,8,10; No. 0041, lines 1,2,4,7,8,9,10;	No. 0105, lines 2,5,6,7,9,10; No. 0106, lines 1,4,5,7,9,10;	No. 0184, lines 3,9; No. 0185, lines 1,3,7,9;
10	No. 0042, lines 1,3,5,6,8,9,10; No. 0043, lines 2,3,4,5,6,8,9,10;	No. 0107, lines 1,2,4,8,10; No. 0108, lines 2,3,4,6,7,8,10;	No. 0186, lines 2,4,5,8,9; No. 0187, lines 1,9,10;
11	No. 0044, lines 1,2,3,4,5,7,10; No. 0045, lines 2,5,6,10;	No. 0109, lines 2 - 10; No. 0110, lines 1,2,3,4,5,6,7,8;	No. 0188, lines 1,5,10; No. 0189, lines 7;
12	No. 0046, lines 1,5,7,8; No. 0047, lines 1,2,3,5,7,8;	No. 0111, lines 1, 3 - 10; No. 0112, lines 1-6, 9,10;	No. 0191, lines 2,3,6,7,8,9,10; No. 0192, lines 1-6, 8-10
13	No. 0048, lines 1,2,3,4,6,7,8; No. 0049, lines 1,3,4,5,6,8,9,10;	No. 0113, lines 1-3, 6-10; No. 0114, lines 1,2,3,4,7,8,9;	No. 0193, lines 1,2,3,4,7,9,10; No. 0194, lines 2,3,8;
14	No. 0050, lines 2,3,5,6,7,8,9,10; No. 0051, lines 2,3,5,7,8,9,10;	No. 0115, lines 1,5; No. 0118, lines 1,2,4,5,7,8,9;	No. 0195, lines 2,3,5,6,8,9,10; No. 0196, lines 1,2,3,6,7,9,10;
15	No. 0052, lines 2,5,8,10; No. 0053, lines 1,3,5,6,10;	No. 0119, lines 2,5,6,7,9,10; No. 0120, lines 1,2,4,5,6,10;	No. 0197, lines 1,2,3, 5 -10; No. 0198, lines 2,7,9,10;
16	No. 0054, lines 1,2,3,4,6,7,8,10; No. 0055, lines 1,2,3,4,5,9,10;	No. 0121, lines 1-5, 7-10; No. 0122, lines 2,3,8;	No. 0199, lines 4,5,6,10; No. 0200, lines 2,3,4,5,6,8,10;
17	No. 0056, lines 2,3,6,7,8,9,10; No. 0057, lines 3,4,6,7,8,9;	No. 0123, lines 2,4,5,7,8; No. 0124, lines 4,5,6,7,8;	No. 0201, lines 1,2,3,4,5,6,10; No. 0202, lines 1,2,3,7;
18	No. 0058, lines 1,2,3,4,6,7,8,10; No. 0059, lines 1,2,4,5,6,7,8,10;	No. 0125, lines 2,3,4,5,6,8,10; No. 0126, lines 1,5,6,7,9;	No. 0203, lines 2,3,5,6,7; No. 0204, lines 1,2,3,4,5,6;
19	No. 0060, lines 2 through 10; No. 0061, lines 1,5,6;	No. 0127, lines 4,7,8,10; No. 0128, lines 2,3,4,5,6;	No. 0205, lines 2-8,10; No. 0206, lines 1,3,4,5,8,9;
20	No. 0062, lines 1,2,6,7,8,9,10; No. 0063, lines 1-9;	No. 0129, lines 1,2,3,8,10; No. 0130, lines 1,7;	No. 0207, lines 1,2,3,4,6,7,10; No. 0208, lines 1 - 10;
21	No. 0064, lines 1-9; No. 0065, lines 1 - 10;	No. 0131, lines 4,5,10; No. 0132, lines 5,9;	No. 0210, lines 2,3,4,5,7,8,9; No. 0211, lines 1,2,3,4,6,7,10;
22	No. 0066, lines 1 - 10; No. 0067, lines 3,5,6,7,8,9,10.	No. 0133, lines 4,5,6,8; No. 0134, lines 9,10;	No. 0212, lines 1- 10; No. 0214, lines 4,5,9;
23	No. 0068, lines 1-3, 5-10;	No. 0135, line 2, ;	No. 0216, lines 1,9
24			
25			
26			

24. One hundred twenty one (121) signatures were voters registered in parties other than Republican or independent (Exhibits D and E), and thus were ineligible as qualified electors to sign the Petitions as shown below in Table B: Signatures From Voters Not Registered as Republican or independent. (Party ID: "D" = Democratic, "L" = Libertarian, and "G" = Green.)

Table B: Signatures From Voters Not Registered as Republican or independent. (D,L,or Green)

Petition No., Line, Party	Petition No., Line, Party	Petition No., Line, Party
No. 0001, Line 7 (D)	No. 0110, Ln. 9 (D), 10 (D)	No. 0157, Line 7 (D)
No. 0003, Line 2 (D), 3 (D)	No. 0111, Line 2 (D)	No. 0158, Line 4 (D)
No. 0010, Line 3 (D)	No. 0115, Lns. 2, 3, 8 (all D)	No. 0159, Line 4 (D)
No. 0024, Line 8 (D)	No. 0119, Line 8 (L)	No. 0160, Line 3 (G)
No. 0026, 8, 9, 10 (all D)	No. 0122, Lns.4, 5, 9, 10 (all D)	No. 0162, Line 2 (D), 7 (D)
No. 0030, Line 10 (D)	No. 0124, Lns. 2, 3, 9 (all D)	No. 0163, Line 9 (D)
No. 0036, Line 10 (D)	No. 0128, Line 8 (D)	No. 0165, Line 2,8,9 (all D)
No. 0043, Line 7 (D)	No. 0129, Line 9 (D)	No. 0166, Line 6 (D), 10 (D)
No. 0044, Line 6 (D), 9 (D)	No. 0131, Line 8 (D), 9 (D)	No. 0167, Line 7 (D)
No. 0045, Line 7 (D)	No. 0132, Line 10 (D)	No. 0169, Line 3 (D)
No. 0046, Line 3 (L), 10 (D)	No. 0133, Line 10 (D)	No. 0172, Line 3 (D)
No. 0047, Line 10 (D)	No. 0134, Line 1,3,5, 7 (all D)	No. 0174, Line 10 (D)
No. 0052, Line 3 (D)	No. 0136, Ln. 7(L), 8 (L), 10(D)	No. 0181, Line 5, 6, 9 (all D)
No. 0053, Line 2 (D)	No. 0138, Line 9 (D)	No. 0182, Line 8 (D)
No. 0056, Line 4 (D)	No. 0142, Line 10 (L)	No. 0183, Line 1 (D)
No. 0057, Line 2 (D)	No. 0143, Line 8 (D)	No. 0187, Line 5 (D)
No. 0061, Ln 4 (D), 8 (L), 10(D)	No. 0144, Line 2 (D)	No. 0190, Line 1 (D)
No. 0067, Line 2 (D)	No. 0145, Line 3 (D), 4 (D)	No. 0193, Line 8 (D)
No. 0071, Line 5 (D), 10 (D)	No. 0146, Line 3 (D),	No. 0194, Line 5 (D), 6 (D)
No. 0077, Line 10 (D)	No. 0147, Line 1 (D), 7 (D)	No. 0196, Line 4 (D)
No. 0082, Line 4 (D)	No. 0148, Line 9 (D)	No. 0203, L. 8, 9, 10 (all D)
No. 0089, Line 1 (L), 10 (D)	No. 0149, Line 8 (D), 10 (D)	No. 0214, Ln. 3 (D), 10 (D)
No. 0090, Line 7 (D), 10 (D)	No. 0150, Line 7 (L)	No. 0217, Line 2 (L)
No. 0091, Line 8 (L)	No. 0152, Line 10 (D)	No. 0219, Line 4 (D), 6 (D)
No. 0093, Line 8 (D)	No. 0153, Line 9 (D)	No. 0220, Line 1 (L)
No. 0099, Line 5 (D)	No. 0155, Line 1 (D)	No. 0221, Line 1 (D), 4 (D)
No. 0104, Line 10 (L)	No. 0156, Line 7 (D)	No. 0222, Line 3 (D)
No. 0107, Line 5 (D)		

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25. One hundred twenty (120) signatures on Petitions for Pima County were not found to be registered Pima County voters in the Pima County Recorders voter database, as reflected in Table C: "Signatures Not Registered" in the Pima County Recorder's System. (Exs. D and E.)

Table C: Signatures Not Registered in Pima County Recorder's System (120 invalid).

Petition No. and line	Petition No. and line	Petition No. and line
Petition 0002, Line 6	Petition 0087, Line 4, 5	Petition 0154, Line 2, 7, 10
Petition 0003, Line 7	Petition 0088, Line 3	Petition 0157, Line 5
Petition 0005, Line 3, 7	Petition 0089, Line 6, 9	Petition 0159, Line 9
Petition 0007, Line 8	Petition 0090, Line 3	Petition 0162, Line 9
Petition 0016, Line 6, 8	Petition 0091, Line 1, 6 (Voluntary Cancellation), 10	Petition 0169, Line 2, 10
Petition 0017, Line 8	Petition 0093, Line 9 (Purged)	Petition 0174, Line 3
Petition 0018, Line 4	Petition 0094, Line 5	Petition 0176, Line 5
Petition 0020, Line 1, 3	Petition 0096, Line 3	Petition 0177, Line 5, 9
Petition 0022, Line 2	Petition 0098, Line 9	Petition 0178, Line 8, 9
Petition 0024, Line 1	Petition 0104, Line 5, 8	Petition 0182, Line 10
Petition 0025, Line 9	Petition 0113, Line 5	Petition 0184, Line 1 (Purged), 2, 4
Petition 0027, Line 6, 8	Petition 0114, Line 5	Petition 0185, Line 2 (Purged), 10
Petition 0031, Line 6	Petition 0115, Line 4	Petition 0186, Line 1
Petition 0038, Line 3 (Purged)	Petition 0117, Line 6, 8	Petition 0188, Line 9
Petition 0042, Line 7	Petition 0121, Line 6	Petition 0189, Line 9
Petition 0048, Line 10	Petition 0126, Line 2, 8	Petition 0190, Line 7, 10
Petition 0049, Line 7	Petition 0130, Line 8	Petition 0200, Line 1, 9
Petition 0050, Line 1, 4	Petition 0132, Line 4	Petition 0201, Line 8
Petition 0051, Line 1	Petition 0134, Line 8	Petition 0202, Line 8
Petition 0053, Line 1,	Petition 0137, Line 2, 5, 9	Petition 0205, Line 1
Petition 0056, Line 1	Petition 0138, Line 4, 10	Petition 0206, Line 2
Petition 0057, Line 10	Petition 0139, Line 4, 6	Petition 0207, Line 9
Petition 0058, Line 9	Petition 0142, Line 3	Petition 0214, Line 6, 7, 8
Petition 0061, Line 2	Petition 0143, Line 10	Petition 0217, Line 1
Petition 0062, Line 5	Petition 0144, Line 1, 4	Petition 0218, Line 2
Petition 0071, Line 7	Petition 0145, Line 10	Petition 0219, Line 2
Petition 0073, Line 7	Petition 0146, Line 10	Petition 0220, Line 2
Petition 0080, Line 4	Petition 0148, Line 5, 6	Petition 0221, Line 7
Petition 0082, Line 7	Petition 0149, Line 1	
Petition 0085, Line 8	Petition 0151, Line 1	
Petition 0086, Line 6		

26. Thirty signatures (30) were "Duplicates" of signatures found on other Petitions submitted by defendant San Miguel: Petition 0031, lines 1-10 is a duplicate of Petition 0204, lines 1-10; Petition 0024, lines 1-10 is a duplicate of Petition 0205, lines 1-10) (one signature also above the

1 line numbers.); and Petition 0025, lines 1-10 is a duplicate of Petition 0207, lines 1-10 (one
 2 signature also above the line numbers.) In addition, two (2) more invalid signatures are on the
 3 following duplicate petitions because they were not signed on numbered lines as required,
 4 making it impossible for Plaintiff to cite a line for the signature: Petition 0024 and Petition 0025
 5 and duplicated on Petition 0205 and Petition 0207 (the "above the lines" signature is also invalid
 6 as a repeat of the signature on Petition 0024, Line 1, and Petition 0205, Line 1). (Exhs. D and E.)

7
 8 27. Forty seven (47) signatures are invalid as the related petitions do not contain signature
 9 lines with the actual date of signing listed as required, or, have a zip code entered instead of a
 10 date in the date column, as reflected below in Table D: Signatures With No Dates:

11 **Table D: Signatures With No Dates.**

Petition and line number with date issue	Petition and line number and date issue
Petition 0004 line 10 has zip code not a date.	Petition 0144 line7 has no date.
Petition 0005 line 10 has zip code not date.	Petition 0151 lines 9, 10 have no dates.
Petition 0007 line 8 has impossible date ("3-80")	Petition 0154 line 10 has no date.
Petition 0020 line 2 has no date.	Petition 0156 line 10 has zip code not date.
Petition 0041 line 5 has no address nor date.	Petition 0164 lines 2,4,5 have no dates.
Petition 0069 line 2 as no date.	Petition 0169 line 10 has no date.
Petition 0073 line 7 has no date.	Petition 0176 line9 has no date.
Petition 0076 line 8 has no date.	Petition 0178 line 7 has no date.
Petition 0078 line 6 has no date.	Petition 0179 lines 4,9 have no dates.
Petition 0080 ins. 2,3,4 (marks/arrows, no dates).	Petition 0182 ins. 2,3, (have no dates), 1 8,9 (have zip codes, not dates).
Petition 0105 line 4 has no date.	Petition 0188 line 8 has no date.
Petition 0130 line 7 has no address and no date.	Petition 0190 line 4,8 have no dates.
Petition 0131 lines 1,2,3,4,5,6,8 have no dates.	Petition 0191 line 9 has no date.
Petition 0134 line 3 has no date.	Petition 0207 line 8 has no date.
Petition 0138 line 10 has no date.	Petition 0210 line 1 has no date.
Petition 0139 line 10 has no date.	

22 28 Nine (9) signatures on various Petitions are invalid because the individuals signed at a
 23 different address before updating their registration, and thus the signatures did not list the correct
 24 elector address registered with the Pima County Recorder: Petition No: 0046, Line 4; 0047, Line
 25 4; 0056, Line 5; 0170, Line 4; 0171, Line 1, 10; 0174, Line 1, 2; 0177, Line 1. (Exhs. D and E.)
 26

1 29. One signature (1) was by a convicted felon and is invalid: Petition 0181, Line 8. (Exhibits
2 D and E.)

3 30. Twelve (12) signatures are invalid on miscellaneous Petitions because the signer's
4 address reflects county residence information that does not match the county information stated
5 on the front of the Petition: signatures on: Petition 0069, line 1; Petition 0075; line 6; Petition
6 0089; line 2; Petition 0104, lines 1, 5; Petition 0109, line 1; Petition 0121, line 6; Petition 0143,
7 line 9; Petition 0151 line 7; Petition 0193, line 5; Petition 0199, line 9; and Petition 0206, line 2.
8 (Exhibit D and E.)
9

10 31. One (1) Petition is invalid in its entirety, containing ten (10) invalid signatures, because
11 the Petition does not contain the circulator's signature as required: Petition 0086, lines 1-10.
12 (Exhibit D and E.)

13 32. One (1) Petition is invalid its entirety and contains nine (9) invalid signatures because the
14 county information is incorrect and does not match the county of the signers: Petition 0137,
15 lines 1, 3-10. (Exhibit D and E.)
16

17 33. Eleven (11) entire Petitions containing a total of eighty nine (89) signatures are invalid
18 due to violations on the front page of the Petition concerning county information, due to listing
19 of wrong county and non-existent county information, or because the circulator altered the
20 Petition at some point and also scratched out the prior county listed, etc. (Exhibit D and E),
21 detailed as follows:

22 A. Five (5) Petitions are invalid in their entirety because they list non-existent and
23 confusing county information in the required space for the correct county in the preamble such as
24 "Pima Ajo" or "Pima Sells", resulting in a total of thirty eight (38) invalid signatures on:
25 Petitions 0018, line 1-4 (four signatures); Petition 0019, lines 1-4 (four signatures); Petition No.
26

1 0146, lines 1-10 (ten signatures); Petition No. 0147, lines 1-10 (ten signatures); and Petition No.
2 0148 lines 1-10 (ten signatures);

3 B. Six (6) Petitions are invalid in their entirety because the circulator scratched out and
4 altered the county information in the required space for the correct county in the preamble,
5 rendering it impossible to know the petitions were properly signed when presented, resulting in a
6 total number of fifty one (51) invalid signatures on: Petition 0021, line 1, 2 (two signatures);
7 Petition 0117, lines 1-10 (ten signatures); Petition 0135 lines 1-3, 5-10 (nine signatures), Petition
8 0138 lines 1-10 (ten signatures), Petition 0139, lines 1-10 (ten signatures); and Petition 0149
9 lines 1-10 (ten signatures). (Exhibit D and E.)
10

11 34. Fifteen (15) entire Petitions containing a total of one hundred twenty two (122) signatures
12 therein are invalid due to false, incorrect or lack of county information on the back-page
13 circulator information area (see Exhibit D and Exhibit E), detailed as follows:

14 A. Four (4) Petitions are invalid in their entirety, containing a total of forty (40) invalid
15 signatures, as they do not provide required county information for the circulator: Petition 0151,
16 lines 1-10; Petition 0179, lines 1-10; Petition 0192, lines 1-10; and Petition 0205, lines 1-10.
17

18 B. Four (4) Petitions are invalid in their entirety, containing a total of thirty two (32)
19 invalid signatures, because the circulator provided false/incorrect information as to the
20 circulator's county of residence by indicating she is qualified or registered to vote in Santa Cruz
21 County, but elsewhere on other Petitions she indicates a Pima County residence: Petition 0021,
22 lines 1-2; Petition 0038, lines 1-10; Petition 0139, lines 1-10; and Petition 0149, lines 1-10.
23

24 C. Three (3) Petitions are invalid in their entirety, containing a total of thirty (30) invalid
25 signatures, because the circulator indicates she is qualified to registered to vote in Pima and Ajo
26 County, but Ajo is town in Pima County, the circulator mislabeled her county elector eligibility

1 thus disqualify these Petitions, for a total of 30 invalid signatures on: Petition 0146, lines 1-10;
2 Petition 0147, lines 1-10; and Petition 0148, lines 1-10.

3 D. One (1) Petition is invalid in its entirety, containing ten (10) invalid signatures
4 because the circulator indicates on the Petition hat she is qualified to register to vote in “Casa
5 Grand”[sic] and Pima County, with “Casa Grand[e]” being a mislabeling of a town name
6 located in Pinal County, as the county, in Arizona, and also as a Pima county resident she is not
7 qualified to register in Casa Grande, even if it was a county: Petition 0055, lines 1-10.
8

9 E. One (1) Petition is invalid in its entirety, containing two (2) invalid signatures because
10 the circulator indicates she is a qualified to register to vote in Ajo, Yuma, and Rio Rico County,
11 but Ajo is a town not a county, Rio Rico is an unincorporated community in Santa Cruz County
12 and the circulator is not qualified to register in Yuma County as she is a resident of Pima County:
13 Petition 0020, lines 1-2.

14 F. One (1) Petition is invalid in its entirety, containing four (4) invalid signatures
15 because the circulator indicates she is registered to vote in Ajo* and Sells* County. Ajo is town
16 in Pima County, not a county, and Sells is the capitol of the Tohono O’odham Indian Nation, not
17 a county: Petition 0019, lines 1-4.
18

19 G. One (1) Petition is invalid in its entirety, with four (4) invalid signatures, because
20 the circulator indicates she is qualified to register to vote in Pima and “Sells” County, but Sells is
21 the capitol of the Tohono O’odham Indian Nation, not a county: Petition 0018, lines 1-4.
22

23 35. Defendants: Pima County Board of Supervisors; Santa Cruz County Board of
24 Supervisors; Pinal County Board of Supervisors; Maricopa County Board of Supervisors; Yuma
25 County Board of Supervisors; F. Ann Rodriguez in her official capacity as the Pima County
26 Recorder; Suzanne Sainz, in her official capacity as Santa Cruz County Recorder; Brad Nelson,

1 in his official capacity as Pima County's Election Division Director; Pouquette Stallworth, in her
2 official capacity as Santa Cruz County Recorder; Virginia Ross in her official capacity as Pinal
3 County Recorder; Helen Purcell, in her official capacity as Maricopa County County Recorder;
4 and Michelle Reagan, in her official capacity as the Arizona Secretary of State, are responsible
5 for accepting the nominating petitions of the candidates, or are responsible for the printing of the
6 official ballot containing the challenged candidates' name, or the agent to receive the service of
7 process for this action.

8
9 36. Defendant, Edna San Miguel, has failed to file the required number of valid nominating
10 signatures to seek the office of U.S. Congressional Representative, Congressional District 3 for
11 the State of Arizona. As a result and pursuant to A.R.S. §16-322(A)(2), defendant Edna San
12 Miguel is not qualified to be a candidate for that Republican Party nomination for that office, and
13 is not qualified to be placed on the official ballot for that office.

14 37. Plaintiff requests this court to issue an order to show cause setting a time for a hearing to
15 issue a preliminary injunction, to permanently enjoin defendants, its attorneys, offices, agents,
16 servants, employees, and any and all persons in concert or participation with them from printing
17 or placing, defendant Edna San Miguel's name on any official voting ballots, for the elected
18 office of U.S. Congressional Representative, Congressional District 3 for the State of Arizona,
19 immediate and irreparable injury, loss of damage will result because Edna San Miguel is not
20 qualified to be a candidate for that office.

21
22 38. Plaintiff has no adequate remedy at law unless an injunction is immediately issued.

23 WHEREFORE, Plaintiff requests the Court to issue the following relief:

24
25 A. Issue an order declaring that defendant, Edna San Miguel, has failed to qualify as a
26 candidate for the office of U.S. Representative, Congressional District 3 for the State of Arizona,

1 by failing to file the required number of nominating signatures and, therefore, ordering her name
2 to be stricken from the official voting ballot for the Republican Party nomination at the primary
3 election to be held on August 30, 2016.

4 B. To issue its order setting a time for hearing for the preliminary injunction.

5 C. To issue an injunction, after hearing, permanently preventing Defendants/respondents
6 Pima County Board of Supervisors; Santa Cruz County Board of Supervisors; Pinal County
7 Board of Supervisors; Maricopa County Board of Supervisors; Yuma County Board of
8 Supervisors; F. Ann Rodriguez in her official capacity as the Pima County Recorder; Suzanne
9 Sainz, in her official capacity as Santa Cruz County Recorder; Brad Nelson, in his official
10 capacity as Pima County's Election Division Director; Pouqette Stallworth, in her official
11 capacity as Santa Cruz County Recorder; Virginia Ross in her official capacity as Pinal County
12 Recorder; Helen Purcell, in her official capacity as Maricopa County County Recorder; and
13 Michelle Reagan, in her official capacity as the Arizona Secretary of State, from printing the
14 official ballot for the Republican Primary election on August 30, 2016 containing the name Edna
15 San Miguel for the office of U.S. Representative, Congressional District 3 for Arizona.
16
17

18 D. Award plaintiff for their costs incurred herein.

19 E. For any other relief this Court deems just and proper.

20
21 Dated June 13, 2016 by:

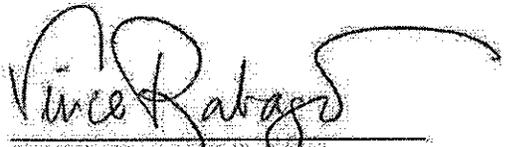

22 VINCE RABAGO, ESQ.
23 VINCE RABAGO LAW OFFICE PLC
24 Attorneys for Betty Villegas
25
26

EXHIBIT A



STATE OF ARIZONA
 Federal Candidate
 NOMINATION PAPER
 AFFIDAVIT OF QUALIFICATION
 (A.R.S. § 16-311)

SECRETARY OF STATE

2016 JUN -1 PM 2:09

FOR OFFICE USE ONLY

You are hereby notified that I, the undersigned, am a candidate for the office of U.S. REP CD 3 subject to the action of the REPUBLICAN Party, at the Primary Election to be held on the 30th day of AUG. 2016, and at the General Election to be held on the 8 day of NOVEMBER 2016, should I be nominated.

I will have been a citizen of the United States for 58 years next preceding my election and will meet the age requirement for the office I seek, and when elected, be an inhabitant of the state from which I am chosen.

I do solemnly swear (or affirm) to the above qualifications and to having fulfilled the constitutional requirements for holding said office.

270 N. SHANNON Rd. APT. 1305 TUCSON AZ 85745
 Actual residence address or description of place of residence (city or town) (zip)

Post office address N/A
 (city or town) (zip)

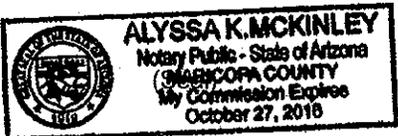
Print or type your name on the following line in the exact manner you wish it to appear on the ballot, last name first. A.R.S. § 16-311(G).
SAN MIGUEL EDNA
 LAST NAME FIRST NAME

Edna San Miguel
 CANDIDATE SIGNATURE

State of Arizona

County of Maricopa

Subscribed and sworn to (or affirmed) before me this 1 day of June, 2016



Alyssa K. McKinley
 Notary Public
 My Commission Expires: 10/27/16

EXHIBIT B

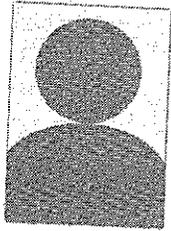
http://apps.azsos.gov/election/2016/Candidates/PrimaryCandidates.htm

apps.azsos.gov

U.S. Representative in Congress - District 3

San Miguel, Edna

Candidate for U.S. Representative in Congress - District 3 (REP)



Address:
270 N. Shannon Rd.
Tucson, AZ 85745

Signatures:
1,091

San Miguel, Edna

No statement has been provided at this time.

[Nomination Paper](#) [Request Candidate's Petitions](#)

EXHIBIT C

Partisan Federal Candidates

Petition Form for Partisan Candidates

2016 Signature Requirements for U.S. Representative in Congress

Signature requirements for U.S. Senator are the same as the requirements for statewide office.

Updated May 18, 2016

Congressional District	Democrat		Republican		Libertarian		Green	
	Min	Max	Min	Max	Min	Max	Min	No Max
CD 1	1,326	26,504	1,198	23,960	638	12,748	92	
CD 2	1,249	24,966	1,260	25,194	637	12,723	108	
CD 3	1,157	23,127	864	17,270	575	11,496	60	
CD 4	1,068	21,352	1,488	29,751	719	14,378	120	
CD 5	1,162	23,228	1,639	32,779	751	15,003	115	
CD 6	1,260	25,199	1,622	32,429	785	15,683	120	
CD 7	1,036	20,710	710	14,186	529	10,562	51	
CD 8	1,230	24,592	1,584	31,667	761	15,204	116	
CD 9	1,220	24,398	1,239	24,770	678	13,559	80	

EXHIBIT D

STATE OF ARIZONA)

)

) ss

AFFIDAVIT OF ERIC ESTRADA

)

County of Pima)

Eric Estrada, being sworn under oath, deposes and declares the following under penalty of perjury:

1. I have examined the signatures on the petitions submitted by Edna San Miguel, candidate for U.S. Representative for Congressional District 3 for the State of Arizona. I compared those signatures and addresses against the voter registration files of the Pima County Recorder's Office, the Arizona Democratic Party, and I also examined the signers' congressional district residency by examining the official government website of the U.S. House of Representative for individuals to determine their correct Congressional District by postal zip code and address, at <http://www.house.gov/representatives/find/>. As a result of my examination of the above information as of the date of the signatures, I have determined that one thousand, six hundred fifty three (1,653) invalid signatures exist in the petitions as explained below:
2. First, one thousand eighty one (1,081) signatures are invalid because they are of persons who are not residents of Congressional District 3. Of this total, one thousand sixty six (1,066) of the invalid signatures are listed below in Table A: Out of District Signatures On Numbered Petition Lines. An additional fifteen (15) invalid out-of-district signatures are located above the signature section on the following petitions, but were not signed on numbered lines as required, thus making it impossible to cite a line: Petition 0014; Petition 0028; Petition 0032; Petition 0034; Petition 0035; Petition 0067; Petition 0084; Petition 0093; Petition 0098; Petition 0118; Petition 0122; Petition 0132; Petition 0192; Petition 0207; Petition 0212; these fifteen (15) signatures are also invalid for failing to be written on a numbered line, as required.

Table A: Out of District Signatures On Numbered Petition Lines.

Petition No. & line numbers	Petition No. & line numbers	Petition No. & line numbers
No. 0001, line 1,8;	No. 0069, lines 2,3,4,5,6,8,10;	No. 0140, lines 1 - 6, 8, 9, 10;
No. 0002, lines; 1, 2, 5, 8, 9, 10;	No. 0070, lines 1,2,3,5,6,7,10;	No. 0141, lines 1,3;
No. 0003, lines; 4,5,9,10.	No. 0071, lines 1,2,3,4,6,9;	No. 0142, lines 6;
No. 0004, lines 1 through 10;	No. 0072, lines 1 through 10;	No. 0144, lines 7,8;
No. 0005, lines 1,2,4,5,6,8,9;	No. 0073, lines 1,3,4,5,6,8,9,10;	No. 0145, lines 8;
No. 0006, lines 1 through 10;	No. 0074, lines 1 through 10;	No. 0148, lines 1,2;
No. 0007, lines 1,3,2,4,6,7,10;	No. 0075, lines 2,3,4,5,7,8,9,10;	No. 0150, lines 6;
No. 0008, lines 3,5,4,6,7,8,9;	No. 0076, lines 1 through 10;	No. 0151, lines 3,8;
No. 0009, lines 1,2,3,7;	No. 0077, lines 2,3,5,6,8,9;	No. 0153, lines 1,2,4,5;
No. 0010, lines 1,2,4;	No. 0078, lines 1 through 10;	No. 0154, lines 1,4,5,6,9;
No. 0012, lines 2,3;	No. 0079, lines 1, 3 through 10;	No. 0155, lines 3,4,5,6,7;
No. 0013, lines 1,3,4;	No. 0080, lines 1,2,5,6,7,8,9;	No. 0156, line 5;
No. 0014, lines 1,3,4,5,6,7	No. 0081, lines 1,2,3,6,7,9;	No. 0158, lines 3,6,7,8,9;
No. 0015, lines 3,6;	No. 0082, lines 1,6,9,10;	No. 0160, lines 2;
No. 0017, lines 1,2;	No. 0083, lines 1,3,6,7,8,9;	No. 0162, lines 1,8;
No. 0019, lines 2,4;	No. 0084, lines 1,2,3,5,6,9;	No. 0163, lines 1,2,3,4,5,6,7,10;
No. 0022, lines 1,3,4,5,6,7,8;	No. 0085, lines 1,10;	No. 0165, lines 3,4,5;
No. 0023, lines 1 through 10;	No. 0087, lines 2,6,8,10;	No. 0166, lines 1,2,5,8;
No. 0024, lines 2,3,4,5,6,7,10;	No. 0088, lines 2,5,6,7,8,9,10;	No. 0167, lines 3,5,6,8,9;
No. 0025, lines 3,4,6,7,10;	No. 0090, lines 8;	No. 0168, lines 1-8, 10;
No. 0026, lines 2,3,4,5,6,7;	No. 0091, lines 5;	No. 0170, lines 1,6,7,8;
No. 0027, lines 1,2,3,7;	No. 0092, lines 1 -8, 10;	No. 0171, lines 3,7,8;
No. 0028, lines 1,2,3,6,7,8,9;	No. 0093, lines 2,3,5,6,7,10;	No. 0172, lines 5;
No. 0029, lines 2,3,4,5,6,7,8,9;	No. 0094, lines 1,2,3,4,6,7,8,10;	No. 0173, lines 8;
No. 0030, lines 1,2,4,9;	No. 0095, lines 1,2,4 through 10;	No. 0174, lines 4,9;
No. 0031, lines 1,2,3,4,5;	No. 0096, lines 1,4,5,6,7,8,9,10;	No. 0175, lines 10;
No. 0032, lines 1,7,8,9,10;	No. 0097, lines 1 through 10;	No. 0176, lines 1,2,3,4,6,9;
No. 0033, lines 1,2,3,4,5,7,9;	No. 0098, lines 1,2,4,5,6,7,8;	No. 0177, lines 7;
No. 0034, lines 1,2,3,6,7,8;	No. 0099, lines 1-4, 6-10;	No. 0178, line 4;
No. 0035, lines 1,3,4,6,7,9,10;	No. 0100, lines 1,2,6,7,8,10;	No. 0179, lines 2,8,9,10;
No. 0036, lines 1,2,3,4,5,6,7,8,9;	No. 0101, lines 1, 2, 4, 5-10;	No. 0180, lines 1,3,8,9;
No. 0037, lines 1, 3 through 10 ;	No. 0102, lines 2,4,5,6,7,8,9;	No. 0181, lines 1,7;
No. 0038, lines 4,5,6,7,8,10;	No. 0103, lines 1,2,3,4,5,6,8,10;	No. 0182, lines 1;
No. 0039, lines 1,3,4,5,7,8,9,10;	No. 0104, lines 2,3,4,6,7,9;	No. 0183, lines 6,7;
No. 0040, lines 1,4,7,8,10;	No. 0105, lines 2,5,6,7,9,10;	No. 0184, lines 3,9;
No. 0041, lines 1,2,4,7,8,9,10;	No. 0106, lines 1,4,5,7,9,10;	No. 0185, lines 1,3,7,9;
No. 0042, lines 1,3,5,6,8,9,10;	No. 0107, lines 1,2,4,8,10;	No. 0186, lines 2,4,5,8,9;
No. 0043, lines 2,3,4,5,6,8,9,10;	No. 0108, lines 2,3,4,6,7,8,10;	No. 0187, lines 1,9,10;
No. 0044, lines 1,2,3,4,5,7,10;	No. 0109, lines 2 through 10;	No. 0188, lines 1,5,10;
No. 0045, lines 2,5,6,10;	No. 0110, lines 1,2,3,4,5,6,7,8;	No. 0189, lines 7;
No. 0046, lines 1,5,7,8;	No. 0111, lines 1, 3 through 10;	No. 0191, lines 2,3,6,7,8,9,10;
No. 0047, lines 1,2,3,5,7,8;	No. 0112, lines 1,2,3,4,5,6,9,10;	No. 0192, lines 1-6, 8-10
No. 0048, lines 1,2,3,4,6,7,8;	No. 0113, lines 1,2,3,6,7,8,9,10;	No. 0193, lines 1,2,3,4,7,9,10;
No. 0049, lines 1,3,4,5,6,8,9,10;	No. 0114, lines 1,2,3,4,7,8,9;	No. 0194, lines 2,3,8;

No. 0050, lines 2,3,5,6,7,8,9,10;	No. 0115, lines 1,5;	No. 0195, lines 2,3,5,6,8,9,10;
No. 0051, lines 2,3,5,7,8,9,10;	No. 0118, lines 1,2,4,5,7,8,9;	No. 0196, lines 1,2,3,6,7,9,10;
No. 0052, lines 2,5,8,10;	No. 0119, lines 2,5,6,7,9,10;	No. 0197, lines 1,2,3, 5 -10;
No. 0053, lines 1,3,5,6,10;	No. 0120, lines 1,2,4,5,6,10;	No. 0198, lines 2,7,9,10;
No. 0054, lines 1,2,3,4,6,7,8,10;	No. 0121, lines 1-5, 7-10;	No. 0199, lines 4,5,6,10;
No. 0055, lines 1,2,3,4,5,9,10;	No. 0122, lines 2,3,8;	No. 0200, lines 2,3,4,5,6,8,10;
No. 0056, lines 2,3,6,7,8,9,10;	No. 0123, lines 2,4,5,7,8;	No. 0201, lines 1,2,3,4,5,6,10;
No. 0057, lines 3,4,6,7,8,9;	No. 0124, lines 4,5,6,7,8;	No. 0202, lines 1,2,3,7;
No. 0058, lines 1,2,3,4,6,7,8,10;	No. 0125, lines 2,3,4,5,6,8,10;	No. 0203, lines 2,3,5,6,7;
No. 0059, lines 1,2,4,5,6,7,8,10;	No. 0126, lines 1,5,6,7,9;	No. 0204, lines 1,2,3,4,5,6;
No. 0060, lines 2 through 10;	No. 0127, lines 4,7,8,10;	No. 0205, lines 2,3,4,5,6,7,8,10;
No. 0061, lines 1,5,6;	No. 0128, lines 2,3,4,5,6;	No. 0206, lines 1,3,4,5,8,9;
No. 0062, lines 1,2,6,7,8,9,10;	No. 0129, lines 1,2,3,8,10;	No. 0207, lines 1,2,3,4,6,7,10;
No. 0063, lines 1,2,3,4,5,6,7,8,9;	No. 0130, lines 1,7;	No. 0208, lines 1 through 10;
No. 0064, lines 1,2,3,4,5,6,7,8,9;	No. 0131, lines 4,5,10;	No. 0210, lines 2,3,4,5,7,8,9;
No. 0065, lines 1 through 10;	No. 0132, lines 5,9;	No. 0211, lines 1,2,3,4,6,7,10;
No. 0066, lines 1 through 10;	No. 0133, lines 4,5,6,8;	No. 0212, lines 1 through 10;
No. 0067, lines 3,5,6,7,8,9,10.	No. 0134, lines 9,10;	No. 0214, lines 4,5,9;
No. 0068, lines 1-3, 5-10;	No. 0135, line 2, ;	No. 0216, lines 1,9;

3. One hundred twenty one (121) signatures were of voters registered other than Republican or independent, and therefore were ineligible as qualified electors to sign the Petitions as reflected below in Table B: Signatures From Voters Not Registered as Republican or independent.

Table B: Signatures From Voters Not Registered as Republican or independent. Party registration shown below (e.g., Libertarian, Democratic, Green). One hundred twenty one (121) invalid.

Petition No., Lines & Party	Petition No., Lines & Party	Petition No., Lines & Party
No. 0001, Line 7 (D)	No. 0110, Ln. 9 (D), 10 (D)	No. 0157, Line 7 (D)
No. 0003, Line 2 (D), 3 (D)	No. 0111, Line 2 (D)	No. 0158, Line 4 (D)
No. 0010, Line 3 (D)	No. 0115, Lns. 2, 3, 8 (all D)	No. 0159, Line 4 (D)
No. 0024, Line 8 (D)	No. 0119, Line 8 (L)	No. 0160, Line 3 (G)
No. 0026, 8, 9, 10 (all D)	No. 0122, Lns.4, 5, 9, 10 (all D)	No. 0162, Line 2 (D), 7 (D)
No. 0030, Line 10 (D)	No. 0124, Lns. 2, 3, 9 (all D)	No. 0163, Line 9 (D)
No. 0036, Line 10 (D)	No. 0128, Line 8 (D)	No. 0165, Line 2,8,9 (all D)
No. 0043, Line 7 (D)	No. 0129, Line 9 (D)	No. 0166, Line 6 (D), 10 (D)
No. 0044, Line 6 (D), 9 (D)	No. 0131, Line 8 (D), 9 (D)	No. 0167, Line 7 (D)
No. 0045, Line 7 (D)	No. 0132, Line 10 (D)	No. 0169, Line 3 (D)
No. 0046, Line 3 (L), 10 (D)	No. 0133, Line 10 (D)	No. 0172, Line 3 (D)
No. 0047, Line 10 (D)	No. 0134, Line 1,3,5, 7 (all D)	No. 0174, Line 10 (D)
No. 0052, Line 3 (D)	No. 0136, Ln. 7(L), 8 (L), 10(D)	No. 0181, Line 5, 6, 9 (all D)
No. 0053, Line 2 (D)	No. 0138, Line 9 (D)	No. 0182, Line 8 (D)

No. 0056, Line 4 (D)	No. 0142, Line 10 (L)	No. 0183, Line 1 (D)
No. 0057, Line 2 (D)	No. 0143, Line 8 (D)	No. 0187, Line 5 (D)
No. 0061, Ln 4 (D), 8 (L),10(D)	No. 0144, Line 2 (D)	No. 0190, Line 1 (D)
No. 0067, Line 2 (D)	No. 0145, Line 3 (D), 4 (D)	No. 0193, Line 8 (D)
No. 0071, Line 5 (D), 10 (D)	No. 0146, Line 3 (D),	No. 0194, Line 5 (D), 6 (D)
No. 0077, Line 10 (D)	No. 0147, Line 1 (D), 7 (D)	No. 0196, Line 4 (D)
No. 0082, Line 4 (D)	No. 0148, Line 9 (D)	No. 0203, L. 8, 9, 10 (all D)
No. 0089, Line 1 (L), 10 (D)	No. 0149, Line 8 (D), 10 (D)	No. 0214, Ln. 3 (D), 10 (D)
No. 0090, Line 7 (D), 10 (D)	No. 0150, Line 7 (L)	No. 0217, Line 2 (L)
No. 0091, Line 8 (L)	No. 0152, Line 10 (D)	No. 0219, Line 4 (D), 6 (D)
No. 0093, Line 8 (D)	No. 0153, Line 9 (D)	No. 0220, Line 1 (L)
No. 0099, Line 5 (D)	No. 0155, Line 1 (D)	No. 0221, Line 1 (D), 4 (D)
No. 0104, Line 10 (L)	No. 0156, Line 7 (D)	No. 0222, Line 3 (D)
No. 0107, Line 5 (D)		

4. One hundred twenty (120) signatures on miscellaneous Petitions for Pima County were not found to be registered Pima County voters in the Pima County Recorders office voter registration database, as reflected below in Table C: Signatures Not Found in the Pima County Recorder's System.

Table C: Signatures Not Registered in Pima County Recorder's System (120 invalid).		
Petition No. and line	Petition No. and line	Petition No. and line
Petition 0002, Line 6	Petition 0087, Line 4, 5	Petition 0154, Line 2, 7, 10
Petition 0003, Line 7	Petition 0088, Line 3	Petition 0157, Line 5
Petition 0005, Line 3, 7	Petition 0089, Line 6, 9	Petition 0159, Line 9
Petition 0007, Line 8	Petition 0090, Line 3	Petition 0162, Line 9
Petition 0016, Line 6, 8	Petition 0091, Line 1, 6 (Voluntary	Petition 0169, Line 2, 10
Petition 0017, Line 8	Cancellation), 10	Petition 0174, Line 3
Petition 0018, Line 4	Petition 0093, Line 9 (Purged)	Petition 0176, Line 5
Petition 0020, Line 1, 3	Petition 0094, Line 5	Petition 0177, Line 5, 9
Petition 0022, Line 2	Petition 0096, Line 3	Petition 0178, Line 8, 9
Petition 0024, Line 1	Petition 0098, Line 9	Petition 0182, Line 10
Petition 0025, Line 9	Petition 0104, Line 5, 8	Petition 0184, Line 1
Petition 0027, Line 6, 8	Petition 0113, Line 5	(Purged), 2, 4
Petition 0031, Line 6	Petition 0114, Line 5	Petition 0185, Line 2
Petition 0038, Line 3 (Purged)	Petition 0115, Line 4	(Purged), 10
Petition 0042, Line 7	Petition 0117, Line 6, 8	Petition 0186, Line 1
Petition 0048, Line 10	Petition 0121, Line 6	Petition 0188, Line 9
Petition 0049, Line 7	Petition 0126, Line 2, 8	Petition 0189, Line 9
Petition 0050, Line 1, 4	Petition 0130, Line 8	Petition 0190, Line 7, 10
Petition 0051, Line 1	Petition 0132, Line 4	Petition 0200, Line 1, 9
Petition 0053, Line 1,	Petition 0134, Line 8	Petition 0201, Line 8
Petition 0056, Line 1	Petition 0137, Line 2, 5, 9	Petition 0202, Line 8
Petition 0057, Line 10	Petition 0138, Line 4, 10	Petition 0205, Line 1
Petition 0058, Line 9	Petition 0139, Line 4, 6	Petition 0206, Line 2
Petition 0061, Line 2	Petition 0142, Line 3	Petition 0207, Line 9
Petition 0062, Line 5	Petition 0143, Line 10	Petition 0214, Line 6, 7, 8
Petition 0071, Line 7	Petition 0144, Line 1, 4	Petition 0217, Line 1
Petition 0073, Line 7	Petition 0145, Line 10	Petition 0218, Line 2
Petition 0080, Line 4	Petition 0146, Line 10	Petition 0219, Line 2
Petition 0082, Line 7	Petition 0148, Line 5, 6	Petition 0220, Line 2
Petition 0085, Line 8	Petition 0149, Line 1	Petition 0221, Line 7
Petition 0086, Line 6	Petition 0151, Line 1	

5. Thirty signatures (30) on miscellaneous Petitions were found to be duplicates of signatures found on other Petitions submitted by defendant San Miguel. (Petition 0031, lines 1-10 is a duplicate of Petition 0204, lines 1-10; Petition 0024, lines 1-10 is a duplicate of Petition 0205, lines 1-10) (one signature is also above the line numbers.); Petition 0025, lines 1-10 is a duplicate of Petition 0207, lines 1-10 (one signature is also above the line numbers.) In addition, two (2) additional invalid signatures are on the following duplicate petitions because they were not signed on numbered lines as required, thus making it impossible for Plaintiff to cite a line for the signature: Petition 0024 and Petition 0025 (the "above the lines" signature is also invalid as a repeat of the signature on Petition 0024, Line 1, and Petition 0205, Line 1)
6. Forty seven (47) signatures on miscellaneous Petitions are invalid as the petitions do not contain signature lines with the actual date of signing listed as required, or, have a zip code entered instead of a date in the date column, as reflected below in Table D: Signatures With No Dates.

Table D: Signatures With No Dates.

Petition and line number with date issue	Petition and line number and date issue
Petition 0004 line 10 has zip code not a date.	Petition 0144 line7 has no date.
Petition 0005 line 10 has zip code not date.	Petition 0151 lines 9, 10 have no dates.
Petition 0007 line 8 has impossible date ("3-80")	Petition 0154 line 10 has no date.
Petition 0020 line 2 has no date.	Petition 0156 line 10 has zip code not date.
Petition 0041 line 5 has no address nor date.	Petition 0164 lines 2,4,5 have no dates.
Petition 0069 line 2 as no date.	Petition 0169 line 10 has no date.
Petition 0073 line 7 has no date.	Petition 0176 line9 has no date.
Petition 0076 line 8 has no date.	Petition 0178 line 7 has no date.
Petition 0078 line 6 has no date.	Petition 0179 lines 4,9 have no dates.
Petition 0080 lns. 2,3,4 (marks/arrows, not dates).	Petition 0182 lns. 2,3, (have no dates), 1 8,9 (have zip codes, not dates).
Petition 0105 line 4 has no date.	Petition 0188 line 8 has no date.
Petition 0130 line 7 has no address and no date.	Petition 0190 line 4,8 have no dates.
Petition 0131 lines 1,2,3,4,5,6,8 have no dates.	Petition 0191 line 9 has no date.
Petition 0134 line 3 has no date.	Petition 0207 line 8 has no date.
Petition 0138 line 10 has no date.	Petition 0210 line 1 has no date.
Petition 0139 line 10 has no date.	

7. **Nine (9) signatures on various Petitions are invalid because the individuals signed at a different address before updating their registration, and thus the signatures did not list the correct elector address registered with the Pima County Recorder. (Petition No: 0046, Line 4; 0047, Line 4; 0056, Line 5; 0170, Line 4; 0171, Line 1, 10; 0174, Line 1, 2; 0177, Line 1.)**
8. **One signature (1) was by a convicted felon (Petition 0181, Line 8).**
9. **Twelve (12) signatures are invalid on miscellaneous Petitions because the signer's address reflects county residence information that does not match the county information stated on the front of the Petition (signatures on: Petition 0069, line 1; Petition 0075; line 6; Petition 0089; line 2; Petition 0104, lines 1, 5; Petition 0109, line 1; Petition 0121, line 6; Petition 0143, line 9; Petition 0151 line 7; Petition 0193, line 5; Petition 0199, line 9; Petition 0206, line 2).**
10. **One (1) Petition is invalid in its entirety, containing ten (10) invalid signatures, because the Petition does not contain the circulator's signature as required. (Petition 0086, lines 1-10)**
11. **One (1) Petition is invalid its entirety and contains nine (9) invalid signatures because the county information is incorrect and does not match the county of the signers (Petition 0137, lines 1, 3-10).**
12. **Eleven (11) entire Petitions containing a total of eighty nine (89) signatures are invalid due to violations on the front page of the Petition concerning county information, due to listing of wrong county and non-existent county information, or because the circulator altered the Petition at some point and also scratched out the prior county listed, etc.**
 - A. **Five (5) Petitions are invalid in their entirety because they list non-existent and confusing county information in the required space for the correct county in the preamble such as "Pima Ajo" or "Pima Sells" resulting in a total number of thirty eight (38) invalid signatures Petitions 0018 (four signatures on lines 1-4), 0019 (four signatures on lines 1-4), 0146 (ten signatures on lines 1-10), 0147 (ten signatures on lines 1-10), and 0148 (ten**

signatures on lines 1-10).

B. Six (6) Petitions are invalid in their entirety because the circulator scratched out and altered the county information in the required space for the correct county in the preamble, rendering it impossible to know that the forms were properly signed when presented, resulting in a total number of fifty one (51) invalid signatures on: Petition 0021 (two signatures on lines 1, 2), 0117 (ten signatures on lines 1-10), Petition 0135 (nine signatures on lines 1-3, 5-10), 0138 (ten signatures on lines 1-10), Petition 0139 (ten signatures, lines 1-10) and Petition 0149 (ten signatures on lines 1-10).

13. Fifteen (15) entire Petitions containing a total of one hundred twenty two (122) signatures therein are invalid due to false, incorrect or lack of county information on the back-page circulator information area:

A. Four (4) Petitions are invalid in their entirety, containing a total of forty (40) invalid signatures, because they do not provide the required county information concerning the circulator. (Petition 0151, lines 1-10); Petition 0179, lines 1-10; Petition 0192, lines 1-10; Petition 0205, lines 1-10).

B. Four (4) Petitions are invalid in their entirety, containing a total of thirty two (32) invalid signatures, because the circulator provided false/incorrect information as to the circulator's county of residence by indicating she is qualified or registered to vote in Santa Cruz County, but elsewhere on other Petitions indicates residence is Pima County. (Petition 0021, lines 1-2; Petition 0038, lines 1-10; Petition 0139, lines 1-10; and Petition 0149, lines 1-10).

C. Three (3) Petitions are invalid in their entirety, containing a total of thirty (30) invalid signatures, because the circulator indicates she is qualified to registered to vote in Pima and Ajo County, but Ajo is town in Pima County, the circulator mislabeled her county elector eligibility thus disqualify these Petitions, for a total of 30 invalid signatures (Petition 0146, lines 1-10;

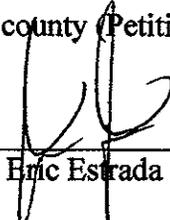
Petition 0147, lines 1-10; Petition 0148, lines 1-10).

D. One (1) Petition is invalid in its entirety, containing ten (10) invalid signatures because the circulator indicates she is qualified to register to vote in "Casa Grand"[sic] and Pima County, with "Casa Grand[e]" being a mislabeling of a town name located in Pinal County, as the county, in Arizona, and also as a Pima county resident she is not qualified to register in Casa Grande, even if it was a county (Petition 0055, lines 1-10).

E. One (1) Petition is invalid in its entirety, containing two (2) invalid signatures because the circulator indicates she is a qualified to register to vote in Ajo, Yuma, and Rio Rico County, but Ajo is a town not a county, Rio Rico is an unincorporated community in Santa Cruz County and the circulator is not qualified to register in Yuma County as she is a resident of Pima County (Petition 0020, lines 1-2).

F. One (1) Petition is invalid in its entirety, containing four (4) invalid signatures because the circulator indicates she is registered to vote in Ajo* and Sells* County. Ajo is town in Pima County, not a county, and Sells is the capitol of the Tohono O'odham Indian Nation, not a county (Petition 0019, lines 1-4).

G. One (1) Petition is invalid in its entirety, with four (4) invalid signatures, because the circulator indicates she is qualified to register to vote in Pima and "Sells" County, but Sells is the capitol of the Tohono O'odham Indian Nation, not a county (Petition 0018, lines 1-4).

Executed in Tucson, Arizona, Pima County on 6/12 2016 by 
Eric Estrada

SUBSCRIBED AND SWORN before me this 12th day of June, 2016

My Commission Expires: June 29, 2016


NOTARY PUBLIC

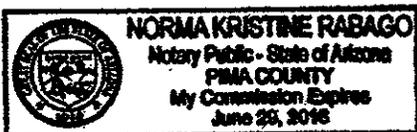
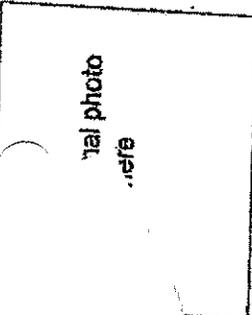


EXHIBIT E

Partisan Nominating Petition

I, the undersigned, a qualified elector of the county of Pima, state of Arizona, and of (here name political division or district from which the nomination is sought) DISTRICT 3, and a member of the Republican party or a person who is registered as no party preference or independent as the party preference or who is registered with a political party that is not qualified for representation on the ballot, hereby nominate Edna San Miguel for the party nomination for the office of who resides at 425 W. Paseo Redondo in the county of Pima for the party nomination for the office of as representing the principles of such party, and I hereby declare that I am qualified to vote for this office and that I have not signed, and will not sign, any nomination petition for more persons than the number of candidates necessary to fill such office at the next ensuing election. I further declare that if I choose to use a post office box address on this petition, my residence address has not changed since I last reported it to the county recorder for purposes of updating my voter registration file.



Signature	Printed name	Actual residence address, description of place of residence or Arizona post-office box address, city or town	Date of signing
<i>Charles Burtz</i>	Charles Burtz	1475 N. Wilmet RA AMT 27 TUCSON, AZ 85712	7/24/15
<i>Daniela G. Santos</i>	DANIELA G SANTOS	1825 W. MERLIN RD TUCSON, AZ 85713	6-24-15
<i>Denise Ubarra</i>	Denise Ubarra	5050 S. Butts Rd Tucson 85757	6/24/15
<i>Antonia Lauterbach</i>	Antonia Lauterbach	8501 W Val-de-Cas Nubias Tucson 85746	6/24/15
<i>Shirley Harvey</i>	Shirley Harvey	6238 south sun view way Tucson AZ 85706	6/24/15
<i>Shirley Harvey</i>	Shirley Harvey	6238 S. Sun View way 85706	6/24/15
<i>Elida Islas</i>	ELIDA ISLAS	916 W Alameda	6-24-15
<i>Mary Ann Lopez</i>	Mary Ann Lopez	5857 S. Mission Rd retr	6-24-15
<i>[Signature]</i>			
<i>[Signature]</i>			

Secretary of State, Revised 7/17/2012