

MARK BRNOVICH  
Attorney General  
Firm Bar No. 14000

TODD C. LAWSON  
State Bar No. 020216  
Assistant Attorney General  
2005 N. Central Avenue  
Phoenix, Arizona 85004  
Telephone: 602-542-3881  
crmfraud@azag.gov

Attorneys for Plaintiff

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF MARICOPA**

**THE STATE OF ARIZONA,**

Plaintiff,

v.

**LORENZO U. HERRERA AKA LARRY  
HERRERA (001),**

Defendant.

Case No:

**87 SGJ 75**

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNT 1: ATTEMPTED  
FRAUDULENT SCHEMES AND  
ARTIFICES**, a Class 3 Felony, in violation  
of A.R.S. § 13-1001 and 13-2310;

**COUNT 2: AGGRAVATED TAKING  
THE IDENTITY OF ANOTHER**, a Class  
3 Felony, in violation of A.R.S. § 13-2009;

**COUNTS 3-18: FORGERY**, Class 4  
Felonies, in violation of A.R.S. § 13-  
2002(A)(3);

**COUNTS 19-34: PERJURY**, Class 4  
Felonies, in violation of A.R.S. § 13-  
2702(A)(2).

The 87<sup>th</sup> Arizona State Grand Jury accuses **LORENZO U. HERRERA AKA LARRY HERRERA (001)** charging on this 14<sup>th</sup> day of September, 2020, that in or from Maricopa County, Arizona:

**COUNT 1**  
**ATTEMPTED FRAUDULENT SCHEMES AND ARTIFICES**

During a period of time beginning on or about January 10, 2018, and ending on or about April 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, pursuant to scheme or artifice to defraud, did knowingly attempt to obtain a benefit by means of fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§13-1001, 13-2310(A), 13-701, 13-702, and 13-801.

Said conduct occurred when **LORENZO U. HERRERA AKA LARRY HERRERA (001)** submitted falsified Qualifying Contribution Forms to the Secretary of State in an attempt to obtain money from the Citizens Clean Elections Fund.

**COUNT 2**  
**AGGRAVATED TAKING THE IDENTITY OF ANOTHER PERSON**

During a period of time beginning on or about January 10, 2018, and ending on or about April 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)** knowingly took, recorded, possessed or used any personal identifying information or entity identifying information three or more other persons, including real or fictitious persons, without the consent of the other persons, with the intent to obtain or use the other persons' identities for any unlawful purpose, in violation of A.R.S. §§13-2009(A)(1), 13-2001, 13-701, 13-702, and 13-801.

Said conduct occurred when **LORENZO U. HERRERA AKA LARRY HERRERA (001)** completed Qualifying Contribution Forms bearing the names of: PATRICIA AKER; BEN ANDREWS; JANET BARNHOLDT; KATHLEEN BOTZ;

JENNIFER ABBOTT-BAYARDI; ANDREW DARLING; PETER FISCHBACH; BENJAMIN FIMBREZ; MICHAEL GREENSLADE; DENNIS KRAH; NANCY MAST; DEBRA POULSON; THOMAS POULSON; BRENDA STEWART; JOHN SYLVESTER; and LIANE WASELUS.

**COUNT 3**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of PATRICIA AKER, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 4**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of BENJAMIN ANDREWS, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 5**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged

instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of JANET BARNHOLDT, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 6**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of KATHLEEN BOTZ, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 7**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of JENNIFER ABBOTT-BAYARDI, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 8**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018,, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged

instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of ANDREW DARLING, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 9**  
**FORGERY**

During a period of time beginning on or about January 10, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of PETER FISCHBACH, in violation of A.R.S. §§13-2002(A)(3), 13-701, 13-702, and 13-801.

**COUNT 10**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of BENJAMIN FIMBREZ, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 11**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged instrument or one which contained false information, to-wit: Citizens Clean Elections

Commission Qualifying Contribution Form in the name of MICHAEL GREENSLADE, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 12**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of DENNIS KRAH, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 13**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of NANCY MAST, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 14**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of DEBRA POULSON, in

violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 15**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of THOMAS POULSON, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 16**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of BRENDA STEWART, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 17**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of JOHN SYLVESTER, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 18**  
**FORGERY**

During a period of time beginning on or about March 6, 2018, and ending on or about March 26, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, with intent to defraud, offered or presented to the Arizona Secretary of State, a forged instrument or one which contained false information, to-wit: Citizens Clean Elections Commission Qualifying Contribution Form in the name of LIANE WASELUS, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 19**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from PATRICIA AKER, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 20**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from BENJAMIN ANDREWS, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 21**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from JANET BARNHOLDT, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 22**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from KATHLEEN BOTZ, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 23**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from JENNIFER ABBOTT-BAYARDI, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 24**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from ANDREW DARLING, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 25**  
**PERJURY**

On or about January 10, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from PETER FISCHBACH, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 26**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from BENJAMIN FIMBREZ, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 27**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from MICHAEL GREENSLADE, violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 28**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from DENNIS KRAH, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 29**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from NANCY MAST, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 30**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from DEBRA POULSON, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 31**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from THOMAS POULSON, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 32**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from ~~P~~<sup>A</sup>BRENDA STEWART, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 33**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from JOHN SYLVESTER, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

**COUNT 34**  
**PERJURY**

On or about February 3, 2018, **LORENZO U. HERRERA AKA LARRY HERRERA (001)**, made a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true, under penalty of perjury, believing it to be false, to-wit: that **LORENZO U. HERRERA AKA LARRY HERRERA** received a \$5.00 Qualifying Contribution from LIANE WASELUS, in violation of A.R.S. §§13-2702(A)(2), 13-2701, 13-701, 13-702, and 13-801.

...

...

...

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

True Bill  
(A "True Bill")

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA



TODD C. LAWSON  
Assistant Attorney General

#8215309v2

Dated: 9-14-20



Foreperson of the State Grand Jury