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10/29/20 2:06 PM
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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA, RCC - DOWNTOWN**

STATE OF ARIZONA,

Plaintiff,

v.

**AZ PETITION PARTNERS LLC d/b/a
PETITION PARTNERS, an Arizona
Limited Liability Company,**

Defendant.

Case No: CR 2020-000467-001

INFORMATION

CHARGING VIOLATIONS OF:

**COUNTS 1-50, PROHIBITED
PAYMENTS FOR SIGNATURE
COLLECTION, Class 1 Misdemeanors, in
violation of A.R.S. §19-118.01**

The Attorney General of the State of Arizona accuses, **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company**, charging that in Maricopa County, Arizona:

COUNT 1

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 10, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through

the actions of Andrew D. Chavez, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS**, an Arizona Limited Liability Company by and through **the actions of Andrew D. Chavez** paid Jim Houlis \$1,200.00 through the “Duel for the Dollars” bonus program based on the number of signatures Houlis collected for the Invest in Education initiative.

COUNT 2

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 10, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS**, an Arizona Limited Liability Company by and through **the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS**, an Arizona Limited Liability Company by and through **the actions of Andrew D. Chavez** paid David Underberg a/k/a David-Michael Underberg \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Underberg collected for the Invest in Education initiative.

COUNT 3

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS**, an Arizona Limited Liability Company by and through **the actions of Andrew D. Chavez**, paid money or any other thing of value based on the

number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Isaac Beasley \$25.00 through the “Duel for the Dollars” bonus program based on the number of signatures Beasley collected for the Invest in Education initiative.

COUNT 4

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Duwaon Branch \$50.00 through the “Duel for the Dollars” bonus program based on the number of signatures Branch collected for the Invest in Education initiative.

COUNT 5

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in

violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Cooper Call \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Call collected for the Invest in Education initiative.

COUNT 6

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Lamonte Cavalier \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Cavalier collected for the Invest in Education initiative.

COUNT 7

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Lauren Cowan \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Cowan collected for the Invest in Education initiative.

COUNT 8

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Richard Cross \$25.00 through the “Duel for the Dollars” bonus program based on the number of signatures Cross collected for the Invest in Education initiative.

COUNT 9

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a**

PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez paid Maria Duarte \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Duarte collected for the Invest in Education initiative.

COUNT 10

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Kaitlyn Dupuis \$20.00 through the “Duel for the Dollars” bonus program based on the number of signatures Dupuis collected for the Invest in Education initiative.

COUNT 11

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through**

the actions of Andrew D. Chavez paid Elisa Egli \$25.00 through the “Duel for the Dollars” bonus program based on the number of signatures Egli collected for the Invest in Education initiative.

COUNT 12

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through **the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through **the actions of Andrew D. Chavez** paid Tyler Epps \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Epps collected for the Invest in Education initiative.

COUNT 13

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through **the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through **the actions of Andrew D. Chavez** paid Savannah Farar a/k/a Savannah Farar \$10.00

through the “Duel for the Dollars” bonus program based on the number of signatures Farar collected for the Invest in Education initiative.

COUNT 14

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Michael Furchell \$150.00 through the “Duel for the Dollars” bonus program based on the number of signatures Furchell collected for the Invest in Education initiative.

COUNT 15

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Gavin Garner \$20.00 through the “Duel for the Dollars” bonus program based on the number of signatures Garner collected for the

Invest in Education initiative.

COUNT 16

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Grantley Garner \$20.00 through the “Duel for the Dollars” bonus program based on the number of signatures Garner collected for the Invest in Education initiative.

COUNT 17

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Karl Goldthorpe \$25.00 through the “Duel for the Dollars” bonus program based on the number of signatures Goldthorpe collected for the Invest in Education initiative.

COUNT 18

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Nicholas Guillermo \$100.00 through the “Weekend Warriors” bonus program based on the number of signatures Guillermo collected for the Invest in Education initiative.

COUNT 19

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Jim Houlis \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Houlis collected for the Invest in Education initiative.

COUNT 20

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Darryl Jackson \$50.00 through the “Duel for the Dollars” bonus program based on the number of signatures Jackson collected for the Invest in Education initiative.

COUNT 21

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Austin Jensen \$20.00 through the “Duel for the Dollars” bonus program based on the number of signatures Jensen collected for the Invest in Education initiative.

COUNT 22

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Ali Korkmaz \$50.00 through the “Duel for the Dollars” bonus program based on the number of signatures Korkmaz collected for the Invest in Education initiative.

COUNT 23

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Kevin Love \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Love collected for the Invest in Education initiative.

COUNT 24

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Kadeem Love \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Love collected for the Invest in Education initiative.

COUNT 25

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Roderick Meeks \$50.00 through the “Duel for the Dollars” bonus program based on the number of signatures Meeks collected for the Invest in Education initiative.

COUNT 26

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Richard Milliner \$50.00 through the “Duel for the Dollars” bonus program based on the number of signatures Milliner collected for the Invest in Education initiative.

COUNT 27

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Forbes Morris \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Morris collected for the Invest in Education initiative.

COUNT 28

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Josselyn Morris \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Morris collected for the Invest in Education initiative.

COUNT 29

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Lucas Mulford \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Mulford collected for the Invest in Education initiative.

COUNT 30

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Caden Oberly \$50.00 through the “Duel for the Dollars” bonus program based on the number of signatures Oberly collected for the Invest in Education initiative.

COUNT 31

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Della Palmer \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Palmer collected for the Invest in Education initiative.

COUNT 32

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Arnita Palmer \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Palmer collected for the Invest in Education initiative.

COUNT 33

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Diamond Parks \$50.00 through the “Duel for the Dollars” bonus program based on the number of signatures Parks collected for the Invest in Education initiative.

COUNT 34

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through **the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through **the actions of Andrew D. Chavez** paid Andrew Pass \$150.00 through the “Duel for the Dollars” bonus program based on the number of signatures Pass collected for the Invest in Education initiative.

COUNT 35

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through **the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through **the actions of Andrew D. Chavez** paid Sheri Porter a/k/a Sherrian Porter \$50.00 through the “Duel for the Dollars” bonus program based on the number of signatures Porter collected for the Invest in Education initiative.

COUNT 36

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Jennifer Rathjen a/k/a Jenniffer Rathjen \$50.00 through the “Duel for the Dollars” bonus program based on the number of signatures Rathjen collected for the Invest in Education initiative.

COUNT 37

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Colin Reed \$150.00 through the “Duel for the Dollars” bonus program based on the number of signatures Reed collected for the Invest in Education initiative.

COUNT 38

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Sergio Rodriguez \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Rodriguez collected for the Invest in Education initiative.

COUNT 39

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Jonathan Saucedo \$50.00 through the “Duel for the Dollars” bonus program based on the number of signatures Saucedo collected for the Invest in Education initiative.

COUNT 40

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through **the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through **the actions of Andrew D. Chavez** paid Wallah Shamsiddeen \$25.00 through the “Duel for the Dollars” bonus program based on the number of signatures Shamsiddeen collected for the Invest in Education initiative.

COUNT 41

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through **the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through **the actions of Andrew D. Chavez** paid Curtis Sherard \$50.00 through the “Duel for the Dollars” bonus program based on the number of signatures Sherard collected for the Invest in Education initiative.

COUNT 42

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Dawn Simpson \$150.00 through the “Duel for the Dollars” bonus program based on the number of signatures Simpson collected for the Invest in Education initiative.

COUNT 43

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Pranee Soukamneuth \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Soukamneuth collected for the Invest in Education initiative.

COUNT 44

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Jamis Spottedhorse \$25.00 through the “Duel for the Dollars” bonus program based on the number of signatures Spottedhorse collected for the Invest in Education initiative.

COUNT 45

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid Bryon Steel \$25.00 through the “Duel for the Dollars” bonus program based on the number of signatures Steel collected for the Invest in Education initiative.

COUNT 46

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Brian Stith \$50.00 through the “Duel for the Dollars” bonus program based on the number of signatures Stith collected for the Invest in Education initiative.

COUNT 47

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Jenifer Taylor Buonaguric \$25.00 through the “Duel for the Dollars” bonus program based on the number of signatures Buonaguric collected for the Invest in Education initiative.

COUNT 48

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Erik Tisinger \$150.00 through the “Duel for the Dollars” bonus program based on the number of signatures Tisinger collected for the Invest in Education initiative.

COUNT 49

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company by and through the actions of Andrew D. Chavez** paid Jason Tsinnijinnie \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Tsinnijinnie collected for the Invest in Education initiative.

COUNT 50

PROHIBITED PAYMENTS FOR SIGNATURE COLLECTION

On or about June 24, 2020, defendant **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez**, paid money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition, in violation of A.R.S. §§ 19-118.01, 13-301, 13-302, 13-303, 13-304, 13-305, and 13-803.

Said conduct occurred when **AZ PETITION PARTNERS LLC d/b/a PETITION PARTNERS, an Arizona Limited Liability Company** by and through the actions of **Andrew D. Chavez** paid David Underberg a/k/a David-Michael Underberg \$100.00 through the “Duel for the Dollars” bonus program based on the number of signatures Underberg collected for the Invest in Education initiative.

The Attorney General further alleges:

A. That at all times relevant to this information, Defendant **AZ PETITION PARTNERS LLC**, was a limited liability company duly organized under the laws of the State of Arizona and doing business in Arizona under the name **PETITION PARTNERS**.

B. That at all times relevant to this information, **Andrew D. Chavez** was a high managerial agent of **AZ PETITION PARTNERS LLC**.

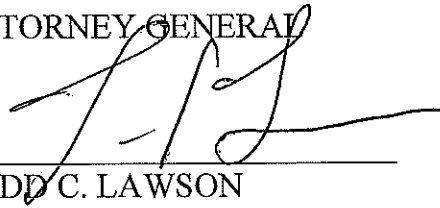
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DATED this 29th day of October, 2020.

MARK BRNOVICH
ATTORNEY GENERAL

A handwritten signature in black ink, appearing to read 'T. Lawson', written over a horizontal line.

TODD C. LAWSON
Assistant Attorney General
Criminal Division

It is requested that a **Summons** be issued.