MARK BRNOVICH Attorney General Firm Bar No. 14000

TODD C. LAWSON State Bar No. 020216 Assistant Attorney General 2005 N. Central Avenue Phoenix, Arizona 85004-1592 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 PIMA

STATE OF ARIZONA,

Case No:

Plaintiff,

88 SGJ 287

v.

INDICTMENT

KYLE ANTHONY CLARK,

CHARGING VIOLATIONS OF:

Defendant.

COUNT 1: FALSE REGISTRATION, a Class 6 Felony, in violation of A.R.S. § 16-182(A);

COUNT 2: ILLEGAL VOTING, a Class 5 Felony, in violation of A.R.S. §16-1016(1).

The 88th Arizona State Grand Jury accuses **KYLE ANTHONY CLARK**, charging on this 2nd day of August, 2021, that in or from Pima County, Arizona:

COUNT 1

FALSE REGISTRATION

On or about September 25, 2020, **KYLE ANTHONY CLARK**, knowingly caused, procured or allowed himself to be registered as an elector of any county, city, town, district or precinct, knowing that he is not entitled to such registration, in violation of A.R.S. §§ 16-182, 16-101, 13-701, 13-702 and 13-801.

Said conduct occurred when KYLE ANTHONY CLARK, knowingly completed a voter registration form which stated in pertinent part "I have NOT been convicted of a FELONY (or my civil rights have been restored)" when in fact he had been convicted of Attempted Trafficking in Stolen Property, a Class Four Felony, in Pima County Superior Court case CR 2016-2540-001 on or about November 9, 2016, and that he had no had his right to vote pot restored after that date.

COUNT 2

ILLEGAL VOTING

During a period beginning on or about October 22, 2020, and ending on or about November 3, 2020, **KYLE ANTHONY CLARK**, not being entitled to vote, knowingly voted, in violation of A.R.S. §§ 16-1016(1), 16-101, 16-1021, 13-701, 13-702 and 13-801.

Said conduct occurred when **KYLE ANTHONY CLARK** voted in the November 2020 General Election despite having had his right to vote suspended because of a conviction for Attempted Trafficking in Stolen Property, a Class Four Felony, in Pima County Superior Court case CR 2016-2540-001 on or about November 9, 2016, with his right to vote not having been restored after that date.

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

ATRUE Bill")

MARK BRNOVICH ATTORNEY GENERAL STATE OF ARIZONA

Dated: 8-2-21

Foreperson of the Grand Jury

TOOD C. LAWSON

Assistant Attorney General

#9467711v1