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V. SATURNINO
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1 TERI HOURIHAN, *in propria persona*
2 6635 W. Happy Valley Rd., Ste A104-621
3 Glendale, AZ 85310
4 (602) 503-0710
5 teri@teriann4azgov.org

6 *Plaintiff, in propria persona*

7
8 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
9 IN AND FOR THE COUNTY OF MARICOPA

10
11 TERI HOURIHAN, an individual and
12 qualified elector,

13 Plaintiff,

14 v.

15 RISA LOMBARDO, an individual,
16 candidate for Governor; ADRIAN FONTES,
17 in his capacity as Arizona Secretary of State;
18 JUSTIN HEAP, in his capacity as Maricopa
19 County Recorder; REY VALENZUELA, in
20 his capacity as Maricopa County Elections
21 Director; MARICOPA COUNTY BOARD
22 OF SUPERVISORS; DAVID LARA, in his
23 capacity as Yuma County Recorder; KIKA
24 GUZMAN, in her capacity as Yuma County
25 Elections Director; YUMA COUNTY
26 BOARD OF SUPERVISORS; DANA
LEWIS, in her capacity as Pinal County
Recorder and Elections Director; PINAL
COUNTY BOARD OF SUPERVISORS;
GABRIELLA CAZARES-KELLY, in her
capacity Pima County Recorder;
CONSTANCE HARGROVE, in her capacity
as Pima County Elections Director; PIMA

CV2026-014153

Case No.

VERIFIED COMPLAINT
(A.R.S. § 16-351 – Challenge to
Nomination Petitions)

1 COUNTY BOARD OF SUPERVISORS;
2 MICHELLE BURCHILL, in her capacity as
3 Yavapai County Recorder; and DOES 1-10,
4 Defendants.

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6
7 Plaintiff Teri Hourihan alleges:

8 1. This is a statutory action brought pursuant to A.R.S. § 16-351 to challenge
9 the legal sufficiency of the nomination petitions submitted by Defendant RISA
10 LOMBARDO, a purported candidate for Governor of the State of Arizona.

11 2. Arizona law requires that a candidate submit a minimum number of valid
12 signatures of qualified electors in order to qualify for placement on the ballot.

13 3. Upon review of Defendant Lombardo's nomination petitions, Plaintiff has
14 identified numerous invalid signatures, defective petition sheets, and unlawful circulator
15 practices, such that the number of valid signatures falls below the statutory minimum
16 required for ballot access.

17 4. Plaintiff therefore seeks an order declaring the nomination petitions
18 insufficient and enjoining Defendant Lombardo's name from appearing on the ballot.

19 **PARTIES**

20 5. Plaintiff Teri Hourihan is a resident of Arizona, a qualified elector, and a
21 candidate for Governor. Plaintiff has standing under A.R.S. § 16-351 to bring this action.

22 6. Defendant Risa Lombardo is an individual who has filed nomination
23 petitions seeking placement on the ballot as a candidate for Governor.

24 7. Defendant Adrian Fontes, Arizona Secretary of State, is the filing officer
25 responsible for accepting nomination petitions and certifying candidates to the ballot.
26

1 Petition sheets circulated by individuals who were not qualified or who engaged in
2 improper or fraudulent practices; (7) Petition sheets that otherwise fail to comply with
3 Arizona statutory requirements; and (8) False or forged signatures.

4 18. Plaintiff further alleges that certain petition circulators were not lawfully
5 qualified and/or engaged in conduct that undermines the validity and reliability of the
6 petition sheets they circulated, including but not limited to irregularities that call into
7 question the truthfulness of circulator certifications.

8 19. Detailed listings of the challenged signatures, including petition number,
9 line number, and the basis for each challenge, are set forth in Exhibits 1 through 6,
10 incorporated herein by reference. Each of the exhibits provides the Bates number of the
11 petition form, actual page number, line number of the petition, and the specific signature
12 challenge as follows: 1) signers not being registered to vote or listed as “inactive” on the
13 voter registration rolls; 2) signers are from the Libertarian Party, No Labels, Republican
14 Party, or Democratic Party; 3) the signature, printed name, and/or address line are
15 invalid; 4) the address or date of the signature are invalid; 5) the person gathering
16 signatures for the petition is not eligible for the reason provided including but not limited
17 to: A) signature gatherers who have felony convictions, B) signature gatherers who are
18 deceased; or C) signature gatherers who stamped the back of forms with a notary stamp
19 for other petitioners who have felony convictions and were thus ineligible to collect
20 signatures; and (6) the public records reviews of each of the petitioners who are shown to
21 have felony convictions or conviction. Thus, making these petitioners not qualified to
22 gather signatures as registered or able to be registered voters. The number of signatures
23 being challenged is 2,267.

24 20. After removing the invalid signatures identified in Exhibits 1 through 6,
25 Defendant Lombardo has only 983 signatures. Accordingly, she does not have the
26 minimum number of valid signatures (1,771) required by law.

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FIRST CLAIM FOR RELIEF

(A.R.S. § 16-351 – Nomination Petition Challenge)

- 21. Plaintiff realleges and incorporates by reference paragraphs 1 through 20.
- 22. Under A.R.S. § 16-351, nomination petitions must contain the required number of valid signatures of qualified electors.
- 23. The nomination petitions submitted by Defendant Lombardo contain a substantial number of invalid signatures and defective petition sheets.
- 24. After accounting for those defects, Defendant Lombardo fails to meet the statutory threshold required for ballot access.
- 25. Plaintiff is entitled to relief declaring the nomination petitions insufficient.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Enter judgment declaring that Defendant Risa Lombardo has failed to submit a sufficient number of valid signatures to qualify for placement on the ballot;
- B. Issue an order enjoining the Arizona Secretary of State and all relevant election officials from placing Defendant Lombardo’s name on the ballot;
- C. Award Plaintiff her costs and attorneys’ fees as permitted by law; and
- D. Grant such other and further relief as the Court deems just and proper.


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EXPEDITED CONSIDERATION

Plaintiff respectfully requests expedited consideration pursuant to A.R.S. § 16-351(A) due to the statutory deadlines governing ballot preparation.

RESPECTFULLY SUBMITTED this 3 day of April 2026.


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By: 
Teri Hourihan, *In propria persona*

VERIFICATION

I, Teri Hourihan, declare under penalty of perjury under the laws of the State of Arizona that I am the Plaintiff in this action; that I have read the foregoing Verified Complaint; and that the facts stated therein are true and correct to the best of my knowledge, information, and belief.

DATED this 3 day of April, 2026.


Teri Hourihan

