

COPY

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CLERK OF THE SUPERIOR COURT
V. SATURNINO
DEPUTY CLERK

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 HUGH LYTLE, an individual, candidate for
16 Governor; ADRIAN FONTES, in his
17 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; ERIN MILLER, in her
23 capacity as Greenlee County Recorder;
24 GREENLEE COUNTY BOARD OF
25 SUPERVISORS; TIMOTHY JORDAN, in
26 his capacity as Navajo County Recorder;
RAYLEEN RICHARDS, in her capacity as
Navajo County Elections Director; NAVAJO
COUNTY BOARD OF SUPERVISORS;
LYDIA HENRY, in her capacity as Mojave
County Recorder; ALLEN TEMPERT, in his
capacity as Mojave County Elections
Director; MOJAVE COUNTY BOARD OF

CV 2026-014149
Case No.

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

1 SUPERVISORS; POLLY MERRIMAN, in
2 her capacity as Mojave County Recorder;
3 HANNAH DUDERSTADT, in her capacity
4 as Mojave County Elections Director;
5 MOJAVE COUNTY BOARD OF
6 SUPERVISORS; BILLY CLOUD, in his
7 capacity as Cochise County Recorder;
8 MELISSA AVANT, in her capacity as
9 Cochise County Elections Officer;
10 COCHISE COUNTY BOARD OF
11 SUPERVISORS; DAVID LARA, in his
12 capacity as Yuma County Recorder; KIKA
13 GUZMAN, in her capacity as Yuma County
14 Elections Director; YUMA COUNTY
15 BOARD OF SUPERVISORS; LARRY
16 NOBLE, in his capacity as Apache County
17 Recorder; MEGAN HILL, in her capacity as
18 Apache County Elections Director;
19 APACHE COUNTY BOARD OF
20 SUPERVISORS; DANA LEWIS, in her
21 capacity as Pinal County Recorder and
22 Elections Director; PINAL COUNTY
23 BOARD OF SUPERVISORS; GABRIELLA
24 CAZARES-KELLY, in her capacity Pima
25 County Recorder; CONSTANCE
26 HARGROVE, in her capacity as Pima
County Elections Director; PIMA COUNTY
BOARD OF SUPERVISORS; MICHELLE
BURCHILL, in her capacity as Yavapai
County Recorder; LAURIN CUSTIS, in her
capacity as Yavapai County Elections
Director; YAVAPAI COUNTY BOARD OF
SUPERVISORS; AUBREY
SONDEREGGER, in her capacity as
Coconino County Recorder; ESLIR
MUSTA, in his capacity as Coconino County
Elections Director; COCONINO COUNTY
BOARD OF SUPERVISORS; WENDY
MANNIGAL-SMITH, in her capacity as

1 Gila County Recorder; ERIC MARISCAL,
2 in his capacity as Gila County Elections
3 Director; GILA COUNTY BOARD OF
4 SUPERVISORS; ANITA MORENO, in her
5 capacity as Santa Cruz County Recorder;
6 ALMA SCHULTZ, in her capacity as Santa
7 Cruz County Elections Director; SANTA
8 CRUZ COUNTY BOARD OF
9 SUPERVISORS; RICHARD GARCIA, in
10 his capacity as La Paz County Recorder;
11 TRACY PAGE, in her capacity as La Paz
12 County Elections Director; LA PAZ
13 COUNTY BOARD OF SUPERVISORS;
14 and DOES 1-10,

Defendants.

15 Plaintiff Teri Hourihan alleges:

16 1. This is a statutory action brought pursuant to A.R.S. § 16-351 to challenge
17 the legal sufficiency of the nomination petitions submitted by Defendant Hugh Lytle, a
18 purported candidate for Governor of the State of Arizona.

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

21 3. Upon review of Defendant Lytle's nomination petitions, Plaintiff has
22 identified numerous invalid signatures, defective petition sheets, and unlawful circulator
23 practices, such that the number of valid signatures falls below the statutory minimum
24 required for ballot access.

25 4. Plaintiff therefore seeks an order declaring the nomination petitions
26 insufficient and enjoining Defendant Lytle's name from appearing on the ballot.

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PARTIES

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

6. Defendant Hugh Lytle is an individual who has filed nomination petitions seeking placement on the ballot as a candidate for Governor.

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

8. Defendant Stephen Richer, Maricopa County Recorder (and/or other relevant county recorders to be added as necessary), is a necessary party responsible for maintaining voter registration records used to verify petition signatures.

9. Defendants named in their official capacities serve in those roles in their respective counties. The multiple Board of Supervisor Defendants are the governing boards for the named counties. These Defendants are responsible for election activities and ballot processes in their respective counties.

10. Defendants DOES 1-10 are election officials whose identities are presently unknown but who may have responsibilities relevant to the relief sought.

JURISDICTION AND VENUE

11. This Court has jurisdiction pursuant to A.R.S. § 16-351(A).

12. Venue is proper in Maricopa County pursuant to statute because the nomination petitions were filed with the Secretary of State.

13. This action is timely filed within the statutory period following the filing of nomination petitions.

COMMON FACTS

14. Defendant Lytle was required to submit at least 1,771 valid signatures of qualified electors to qualify for placement on the ballot.

1 15. Defendant Lytle submitted nomination petitions purporting to contain
2 sufficient signatures.

3 16. Plaintiff has conducted a review of those nomination petitions.

4 17. That review reveals that a substantial number of signatures are invalid,
5 including but not limited to: (1) Signatures of individuals who are not registered voters in
6 the State of Arizona; (2) Signatures of individuals not registered at the address provided
7 on the petition; (3) Illegible or unverifiable signatures; (4) Signatures outside the relevant
8 jurisdiction; (5) Petition sheets containing defective or false circulator affidavits; (6)
9 Petition sheets circulated by individuals who were not qualified or who engaged in
10 improper or fraudulent practices; and (7) Petition sheets that otherwise fail to comply
11 with Arizona statutory requirements.

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

16 19. Detailed listings of the challenged signatures, including petition number,
17 line number, and the basis for each challenge, are set forth in Exhibits 1 through 6,
18 incorporated herein by reference. Each of the exhibits provides the Bates number of the
19 petition form, actual page number, line number of the petition, and the specific signature
20 challenge as follows: 1) signers not being registered to vote or listed as “inactive” on the
21 voter registration rolls; 2) signers are from the Libertarian Party, Green Party, Republican
22 Party, or Democratic Party; 3) the signature, printed name, and/or address line are
23 invalid; 4) the address or date of the signature are invalid; 5) the person gathering
24 signatures for the petition is not eligible for the reason provided including but not limited
25 to: A) signature gatherers who have felony convictions, B) signature gatherers who are
26 deceased; or C) signature gatherers who stamped the back of forms with a notary stamp

1 for other petitioners who have felony convictions and were thus ineligible to collect
2 signatures; and (6) the public records reviews of each of the petitioners who are shown to
3 have felony convictions or conviction. Thus, making these petitioners not qualified to
4 gather signatures as registered or able to be registered voters. The number of signatures
5 being challenged is 4,748.

6 20. After removing the invalid signatures identified in Exhibits 1 through 6,
7 Defendant Lytle has only 1,219 signatures. Accordingly, he does not have the minimum
8 number of valid signatures (1,771) required by law.

9
10 **FIRST CLAIM FOR RELIEF**

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

12 21. Plaintiff realleges and incorporates by reference paragraphs 1 through 20.

13 22. Under A.R.S. § 16-351, nomination petitions must contain the required
14 number of valid signatures of qualified electors.

15 23. The nomination petitions submitted by Defendant Lytle contain a
16 substantial number of invalid signatures and defective petition sheets.

17 24. After accounting for those defects, Defendant Lytle fails to meet the
18 statutory threshold required for ballot access.

19 25. Plaintiff is entitled to relief declaring the nomination petitions insufficient.

20
21 **PRAYER FOR RELIEF**

22 **WHEREFORE**, Plaintiff respectfully requests that this Court:

23 A. Enter judgment declaring that Defendant Hugh Lytle has failed to submit a
24 sufficient number of valid signatures to qualify for placement on the ballot;

25 B. Issue an order enjoining the Arizona Secretary of State and all relevant election
26 officials from placing Defendant Lytle's name on the ballot;

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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.

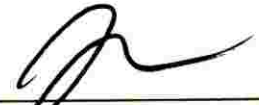
RESPECTFULLY SUBMITTED this 3 day of April 2026.

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