

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,

Plaintiff,

v.

KENNETH RUSSELL NELSON,

Defendant.

Case No:

89 SGJ 5

INDICTMENT

CHARGING VIOLATIONS OF:

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

COUNTS 2-4: ILLEGAL VOTING, Class
5 Felonies, in violation of A.R.S. §16-
1016(1).

The 89th Arizona State Grand Jury accuses **KENNETH RUSSELL NELSON**,
charging on this 13th day of September, 2021, that in or from Pima County, Arizona:

...

...

COUNT 1

FALSE REGISTRATION

On or about July 26, 2018, **KENNETH RUSSELL NELSON**, 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 **KENNETH RUSSELL NELSON**, knowingly completed a voter registration form which stated in pertinent part "I am NOT a convicted FELON or my civil rights are restored" when in fact he had been convicted of Aggravating Driving While Under the Influence of Liquor While License is Suspended, Canceled, Revoked, or Refused, a Class Four felony, in Pima County Superior Court case CR 2007-2393 on September 28, 2007, with his right to vote not having been restored after September 28, 2007.

COUNT 2

ILLEGAL VOTING

On or about August 28, 2018, **KENNETH RUSSELL NELSON**, 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 **KENNETH RUSSELL NELSON** voted in the August 2018 Primary Election despite having had his right to vote suspended because of a conviction for Aggravating Driving While Under the Influence of Liquor While License is Suspended, Canceled, Revoked, or Refused, a Class Four felony, in Pima County

Superior Court case CR 2007-2393 on September 28, 2007, with his right to vote not having been restored after September 28, 2007.

COUNT 3

ILLEGAL VOTING

On or about November 6, 2018, **KENNETH RUSSELL NELSON**, 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 **KENNETH RUSSELL NELSON** voted in the November 2018 General Election despite having had his right to vote suspended because of a conviction for Aggravating Driving While Under the Influence of Liquor While License is Suspended, Canceled, Revoked, or Refused, a Class Four felony, in Pima County Superior Court case CR 2007-2393 on September 28, 2007, with his right to vote not having been restored after September 28, 2007.

COUNT 4

ILLEGAL VOTING

During a period of time beginning on or about October 22, 2020, and ending on or about November 3, 2020, **KENNETH RUSSELL NELSON**, 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 **KENNETH RUSSELL NELSON** voted in the November 2020 General Election despite having had his right to vote suspended because of a conviction for Aggravating Driving While Under the Influence of Liquor While License is Suspended, Canceled, Revoked, or Refused, a Class Four felony, in Pima


County Superior Court case CR 2007-2393 on September 28, 2007, with his right to vote not having been restored after September 28, 2007.

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

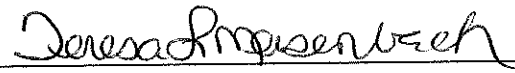
True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 9/13/21



TODD C. LAWSON
Assistant Attorney General



Foreperson of the Grand Jury

#9631819v2