

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO</p> <p>1437 Bannock Street Denver, CO 80202</p>	<p><input type="checkbox"/> COURT USE ONLY <input type="checkbox"/></p>
<p>THE PEOPLE OF THE STATE OF COLORADO</p> <p>vs.</p> <p>CHERELL LONG, a/k/a/ CHERELL LANG AND/OR CHERELL MONIQUE LANG,</p> <p>AND</p> <p>MARTIN ARELLANO,</p> <p>Defendants.</p>	
<p>PHILIP J. WEISER, Attorney General ROBERT SHAPIRO, First Assistant Attorney General * 1300 Broadway, 9th Floor Denver, Colorado 80203 (720) 508-6700 Registration Number: 26869 *Counsel of Record</p>	<p>Grand Jury Case No: 25CR0001</p> <p>Courtroom 259</p>
<p align="center">COLORADO STATEWIDE GRAND JURY INDICTMENT</p>	

Of the 2025-2026 term of the Denver District Court in the year 2026; the 2025-2026 Colorado Statewide Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

CHARGES:

- COUNT ONE:** Attempt to Influence a Public Servant, C.R.S §18-8-306, (F4) [24051]
- COUNT TWO:** Perjury in the Second Degree, C.R.S. §§1-13-104 and 18-8-503 (M2) [25022]
- COUNT THREE:** Forgery, C.R.S. §§1-13-106 and 18-5-102 (F5) [3802J]
- COUNT FOUR:** Forgery, C.R.S. §18-5-102(1)(d), (F5) [1001D]

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Cherell Long a/k/a Cherell Lang and/or Cherell Monique Lang	1-4
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COUNT ONE
ATTEMPT TO INFLUENCE A PUBLIC SERVANT
C.R.S. § 18-8-306 (F4)

On or about May 15, 2024 through November 5, 2024, and triable in the City and County of Denver, State of Colorado, **CHERELL LONG, a/k/a CHERELL LANG and/or CHERELL MONIQUE LANG, and MARTIN ARELLANO**, unlawfully and feloniously attempted to influence one or more of the following public servants, Secretary of State Jena Griswold and/or her employees, agents and/or designees within the Colorado Department of State a/k/a the Colorado Secretary of State's Office, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT TWO
PERJURY IN THE SECOND DEGREE
C.R.S. §§ 1-13-104 and 18-8-503 (M2)

On or about May 15, 2024 through June 19, 2024, and initially discovered on or about March 31, 2025, and triable in the City and County of Denver, State of Colorado, **CHERELL LONG, a/k/a CHERELL LANG and/or CHERELL MONIQUE LANG, and MARTIN ARELLANO**, unlawfully, having taken an oath or made an affirmation required by the Uniform Election Code of 1992 (Articles 1 to 13, Title 1 of the Colorado Revised Statutes), did swear or affirm willfully, corruptly, and falsely in a manner material to the issue or point in question or suborn any other person to swear or affirm as aforesaid; and/or other than in an official proceeding, with an intent to mislead a public servant, namely: Secretary of State Jena Griswold and/or her employees, agents and/or designees within the Colorado Secretary of State's Office, in the performance of the public servant's duty, made a materially false statement, regarding an Affidavit of Circulator, which the defendant did not believe to be true, under an oath required or authorized by law; in violation of sections 1-13-104, and 18-8-503, C.R.S.

COUNT THREE
FORGERY
C.R.S. §§ 1-13-106 and 18-5-102 (F5)

On or about May 15, 2024 through November 5, 2024, and triable in the City and County of Denver, State of Colorado, **CHERELL LONG, a/k/a CHERELL LANG and/or CHERELL MONIQUE LANG, and MARTIN ARELLANO**, unlawfully and feloniously, with the intent to defraud Secretary of State Jena Griswold, her office (the Colorado Department of State a/k/a/ the Colorado Secretary of State's Office) and/or her employees, agents or designees, forged any name of a person as a signer or witness to a petition or nomination paper; in violation of sections 1-13-106 and 18-5-102, C.R.S.

COUNT FOUR
FORGERY
C.R.S §18-5-102(1)(d) (F5)

On or about, May 15, 2024 through November 5, 2024, and triable in the City and County of Denver, State of Colorado, **CHERELL LONG, a/k/a CHERELL LANG and/or CHERELL MONIQUE LANG, and MARTIN ARELLANO**, unlawfully and feloniously, with the intent to defraud Secretary of State Jena Griswold, her office (the Colorado Department of State, a/k/a the Colorado Secretary of State's Office), her employees, agents and/or designees, falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a public record or an instrument, namely: one or more Petitions, filed, required by law to be filed, or legally fileable in or with the Colorado Department of State a/k/a the Colorado Secretary of State's Office, a public office or public servant; in violation of section 18-5-102(1)(d), C.R.S.

The essential, but nonexclusive, facts in support of Counts One through Four are as follows:

In 2024 proponents of a state ballot initiative which sought to enshrine a state constitutional right of school choice in K-12 education embarked on the process to get this measure before the voters. To accomplish this goal the proponents were required to initiate a detailed process by following the established state laws, rules and procedures of various governmental entities within the State of Colorado, including the Colorado Secretary of State. This process included the proponents being required to collect signatures from eligible registered voters so that their initiative could be placed on the November 2024 General Election ballot. This initiative was first known as Initiative 138. It was later known as Amendment 80 when it made the ballot.

The proponents then retained three businesses as licensed petition entities. These entities had to follow state law, election rules and procedures to collect a sufficient amount of signatures from valid Colorado registered voters/electors on the petitions for this particular initiative. These licensed petition entities included Victor's Canvassing, LLC of Colorado Springs, CO. Once the petitions were vetted and approved by the state for circulation so that signatures could be collected from registered electors the licensed petition entities started to hire individual paid circulators. During 2024 a circulator in Colorado had to be a United States citizen who was at least 18 years of age at the time that the petition was circulated and who had affirmed that they had read and understood the laws regarding petition circulation. As of 2024, a circulator was not required to complete available circulator training. However, the petition entity business which retained the circulator was required to inform the circulator that a state developed circulator training program was available for review.

Once the circulator collects purported authentic signatures on the petitions from eligible Colorado electors the circulator takes the completed petition sections to a notary public and submits an affidavit after swearing to or affirming under penalty of perjury that the petitions with the collected signatures met certain specified requirements. The notarized affidavits are then collected by the petition entity in question and the proponent of the initiative then reviews and submits the petitions with signatures to the Colorado Secretary of State. Paid circulators were typically compensated for each signature that was ultimately submitted to the Secretary of State and her office. In 2024 the elected Colorado Secretary of State was Jena Griswold. Her office, with its staff of public servants, was located in the City and County of Denver, State of Colorado.

In this matter evidence was developed by a sworn Grand Jury Investigator which showed that once the petitions for Initiative 138 were submitted to the Colorado Secretary of State additional validation processes occurred. These validation processes included post-sufficiency reviews. These reviews were designed to check the validity of purported names and signatures which were being submitted on the petitions.

In Colorado the Secretary of State uses a system known as the State of Colorado Registration and Election (SCORE) to conduct post-sufficiency reviews which are designed to assist with validating the eligibility of electors and signatures which have been submitted on petitions. Before this final SCORE assessment occurred in this matter and because Initiative 138 did receive a sufficient number of signatures which were presumed to have been valid the measure was permitted to appear on the November 5, 2024 general election ballot. The threshold amount of valid names and signatures in 2024 was 124,238 for a measure to be approved and eligible for being placed onto the ballot.

It should be noted that the initial review of the submitted petitions for the Secretary of State was conducted by a vendor which did the first assessment of the submitted petitions. This initial assessment by the vendor examined in excess of 190,000 signatures which had been submitted by the proponents. Of that amount the vendor determined that a smaller amount of the submitted signatures appeared to be valid. The vendor assessed amount of presumptively valid names and signatures were still above the minimum required threshold.

Staff at the Secretary of State's office later started to conduct its own internal post-sufficiency reviews. These Secretary of State led reviews made some concerning observations which led to the Secretary of State's office conducting a deeper examination and assessment. The Secretary of State's observations included various submitted signatures of purported electors on the petitions that did not match known exemplars of the registered elector which were on file with the state. Next, the Secretary of State staff then observed that various submitted names and signatures on the petitions were for individuals who were deceased well before the date that the purported signatures were written on the petitions. Finally, the Secretary of State staff also observed that various names and signatures on the petitions were for individuals whose registrations had been cancelled because they had moved from the addresses which were on file with the state.

A sworn Grand Jury Investigator later determined that a small group of circulators, who worked as contractors on behalf of Victor's Canvassing, LLC, were associated with the majority of the suspected submissions of the fraudulent names and signatures at issue. In each instance the names and signatures which had been written on the petitions were sworn to and were ultimately submitted to the Colorado Secretary of State and her office. It is a reasonable inference that it was an intention of the paid circulators in question that these submitted names and signatures would be accepted by that office and its public servants.


The first of the identified circulators was Cherell Long, a/k/a Cherell Lang and/or Cherell Monique Lang, a Nevada resident, who worked for Victor's Canvassing as a paid circulator to collect petition signatures for Initiative 138 in 2024. The investigation determined that on the petition sections which had been collected by Ms. Long four names and signatures of purported electors that she claimed had been collected from May 15-18, 2024 were those of four Coloradans who were deceased because they had passed away between 2016 and 2022. Ms. Long also appeared before a notary and swore or affirmed under penalty of perjury to her petition sections before they were formally submitted to the Secretary of State's Office

Additional evidence determined that Ms. Long's petition sections also included fifteen purported names and signatures of living Colorado electors which appeared to be fraudulent. Two of the fifteen electors returned inquiries from law enforcement. Both electors who responded to law enforcement confirmed that the signatures on the petition sections were not theirs. The dates of fraudulent names and signatures ranged from May 15, 2024 through June 18, 2024. The date of Ms. Long's final appearance before a notary where she swore or affirmed to her submissions was June 19, 2024.

The second identified circulator was Martin Arellano, a Texas resident. In early May 2024 Mr. Arellano, like Cherell Long, was hired by Victor's Canvassing to serve as a paid circulator and was tasked with collecting signatures for Initiative 138. The investigation showed that Mr. Arellano submitted petition sections for Initiative 138 which contained names and signatures of four deceased Coloradans that he claimed were obtained by him in mid-May 2024. Then, on May 21, 2024 Mr. Arellano appeared before a notary and swore to or affirmed under penalty of perjury to his submitted petition sections. Mr. Arellano's petition sections with the four deceased names and signatures were ultimately submitted to the Secretary of State's office after being notarized under oath.

Additional evidence determined that Mr. Arellano's petition sections also included purported names and signatures of two living people who previously resided in Colorado, but who were not Colorado residents in 2024. Both individuals provided information which indicated that the purported signatures on the submitted petitions were not theirs. The dates of the fraudulent names and signatures being added to the petition sections controlled by Mr. Arellano occurred on May 17-18, 2024

PHILIP J. WEISER
Attorney General

By: 
Robert S. Shapiro
First Assistant Attorney General
Criminal Justice Section

Subscribed to before me in the City and County of Denver, State of Colorado this 16th day of April 2026.


Notary Public

SEAL

My commission expires: 4/28/29

SARAH MEADE
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20254016288
MY COMMISSION EXPIRES 4/28/29

The 2025-2026 Colorado Statewide Grand Jury presents the within Indictment, and the same is hereby ORDERED FILED this 30th day of April 2026.

Pursuant to §13-73-107, C.R.S., the Court designates Denver County, Colorado as the county of venue for the purposes of trial.



Hon. Christopher J. Baumann
Chief Judge for the Second Judicial District and
Presiding Judge for the Statewide Grand Jury