

INDICTMENT

CAUSE NO. 50949-B

THE STATE OF TEXAS vs. MARLENA ROSANNE JACKSON

DOB: 11/29/1969

OFFENSE: COUNT ONE: ENGAGING IN ORGANIZED ELECTION FRAUD (F1)
 COUNT TWO: ILLEGAL VOTING (F2)
 COUNTS THREE: THIRTY-THREE - FRAUDULENT USE OF MAIL BALLOT APPLICATION ENHANCED (F3)
 COUNTS THIRTY-FOUR – FORTY: UNLAWFUL POSSESSION OF BALLOT/BALLOT ENVELOPE ENHANCED (SJF)
 COUNTS FORTY-ONE – SEVENTY-ONE: ELECTION FRAUD ENHANCED (SJF)
 COUNTS SEVENTY-TWO – NINETY-SEVEN: TAMPERING WITH A GOVERNMENTAL RECORD WITH INTENT TO HARM OR DEFRAUD (SJF)

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

THE GRAND JURORS, duly selected, empaneled, sworn, charged, and organized as such for the County of Gregg, State of Texas, at the July-December, 2020 term of the 188th District Court for said County, upon their oaths present in and to said Court that from on or about the 22nd day of January A.D., 2018 and continuing until on or about the 6th day of March A.D., 2018, and anterior to the presentment of this Indictment, in the County and State aforesaid, MARLENA ROSANNE JACKSON, hereinafter called Defendant, did then and there,

COUNT ONE

Engaging in Organized Election Fraud (F1)

with the intent to establish, maintain, and participate in a vote harvesting organization, said organization consisting of Shannon Brown, Marlena Jackson, Dewayne Ward, and Charlie Burns, who collaborated in carrying on election offenses under Titles 1 through 7 of the Texas Election Code, knowingly commit the offenses of illegal voting, unlawful assistance, fraudulent use of a mail ballot application multiple times in the same election, unlawful possession of a ballot or carrier envelope of another multiple times in the same election, and unlawfully assisting a voter voting a ballot by mail, by committing said offenses as the primary actor or by acting with the intent to promote or assist the commission of said offenses by soliciting, encouraging, directing, aiding, or attempting to aid members of said organization to commit said offenses,

COUNT TWO
Illegal Voting (F2)

And further that Defendant, on or about the 13th day of February A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas did then and there knowingly mark Andrew Erwin's ballot, without specific direction from Andrew Erwin on how to mark the ballot,

COUNT THREE
Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Corby Martin, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT FOUR
Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Linda Carrier, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT FIVE
Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Davonia Bradley, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT SIX
Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Rayford Jordan, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT SEVEN
Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Victoria Miller-Burns, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT EIGHT

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Lorine Bagley, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT NINE

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Eric Taylor, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT TEN

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Yolita Johnson, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT ELEVEN

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Lorenzo Washington, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT TWELVE

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Terri Thomas, specifically: Defendant indicated by signature that she assisted the voter in completing an application for ballot by mail, when in fact Shannon Brown, a candidate on the ballot in the upcoming election, assisted the voter with said application,

COUNT THIRTEEN

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 23rd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Robert Harvey Jr., specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT FOURTEEN

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Roceta Anderson, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT FIFTEEN

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Kaylon Earl, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT SIXTEEN

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Ricardo Pencheon, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT SEVENTEEN

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Shannon Martin, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT EIGHTEEN

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Jennifer Martin, specifically: Defendant indicated by signature the she assisted the voter in completing an application for ballot by mail, when in fact Shannon Brown, a candidate on the ballot in the upcoming election, assisted the voter with said application,

COUNT NINETEEN

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Mary Lynn Odom, specifically: Defendant indicated by signature that she assisted the voter in completing an application for ballot by mail, when in fact another person assisted the voter with said application,

COUNT TWENTY

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Tiesean McCray, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT TWENTY-ONE

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas did then and there knowingly provide false information on an application for ballot by mail for a voter, Otis Jones, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT TWENTY-TWO

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Kenneth Pierson, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT TWENTY-THREE

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on application for ballot by mail for a voter, Athena Johnson, specifically: Defendant indicated by signature that she assisted the voter in completing an application for ballot by mail, when in fact another person assisted the voter with said application,

COUNT TWENTY-FOUR

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Roderick Smith, specifically: Defendant indicated by signature that she assisted the voter in completing an application for ballot by mail, when in fact another person assisted the voter with said application,

COUNT TWENTY-FIVE

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 1st day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas did then and there knowingly provide false information on an application for ballot by mail for a voter, Beshad Faggans, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT TWENTY-SIX

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 1st day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Veronica Moore, specifically: Defendant indicated by signature that she assisted the voter in completing an application for ballot by mail, when in fact Shannon Brown, a candidate on the ballot in the upcoming election, assisted the voter with said application,

COUNT TWENTY-SEVEN

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 2nd day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Coby Johnson, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT TWENTY-EIGHT

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 2nd day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Cason Johnson, specifically: Defendant marked the application to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT TWENTY-NINE

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 14th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Keyianna Lister, specifically: Defendant indicated by signature that she assisted the voter in completing an application for ballot by mail, when in fact Shannon Brown, a candidate on the ballot in the upcoming election, assisted the voter with said application,

COUNT THIRTY

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 14th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly provide false information on an application for ballot by mail for a voter, Tamika Buchanan, specifically: Defendant indicated by signature that she assisted the voter in completing an application for ballot by mail, when in fact Shannon Brown, a candidate on the ballot in the upcoming election, assisted the voter with said application,

COUNT THIRTY-ONE

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Andrew Erwin, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT THIRTY-TWO

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Elizabeth Choice, specifically: Defendant caused a forged signature of the voter to be appear on her application for ballot by mail,

COUNT THIRTY-THREE

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly submit an application for ballot by mail for voter Kaylon Earl without the voter's knowledge and authorization, specifically: Defendant submitted an application that purported to be a request by the voter to receive ballots by mail for the Democratic Party for elections occurring in 2018, when in fact the voter did not wish to make such a request,

And it is further alleged that Defendant committed the offenses described in Counts Three through Thirty-Three in the March 6, 2018 Democratic primary election,

COUNT THIRTY-FOUR

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 12th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Linda Carrier,

COUNT THIRTY-FIVE

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 13th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Robert Harvey Jr,

COUNT THIRTY-SIX

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further, that Defendant, on or about the 13th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Andrew Erwin,

COUNT THIRTY-SEVEN

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 15th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Rayford Jordan,

COUNT THIRTY-EIGHT

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 20th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Coby Johnson,

COUNT THIRTY-NINE

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 20th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Cason Johnson,

COUNT FORTY

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 21st day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Ricky Johnson,

And it is further alleged that Defendant committed the offenses described in Counts Thirty-Four through Forty in the March 6, 2018 Democratic primary election,

COUNT FORTY-ONE

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 12th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there, while in the presence of the ballot and during the voting process, knowingly make an effort to influence the independent exercise of the vote of Linda Carrier, specifically: Defendant influenced Linda Carrier to vote for candidate Shannon Brown for Gregg County Commissioner, Precinct 4,

COUNT FORTY-TWO

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Yolita Johnson, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Yolita Johnson's mail ballot application to be marked "disability," when Yolita Johnson was in fact not disabled and was not eligible to vote by mail,

COUNT FORTY-THREE

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Corby Martin, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Corby Martin's mail ballot application to be marked "disability," when Coby Martin was in fact not disabled and was not eligible to vote by mail,

COUNT FORTY-FOUR

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Lorine Bagley, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Lorine Bagley's mail ballot application to be marked "disability," when Lorine Bagley was in fact not disabled and was not eligible to vote by mail,

COUNT FORTY-FIVE

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Eric Taylor, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Eric Taylor's mail ballot application to be marked "disability," when Eric Taylor was in fact not disabled and was not eligible to vote by mail,

COUNT FORTY-SIX

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Davonia Bradley, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Davonia Bradley's mail ballot application to be marked "disability," when Davonia Bradley was in fact not disabled and was not eligible to vote by mail,

COUNT FORTY-SEVEN

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Linda Carrier, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Linda Carrier's mail ballot application to be marked "disability," when Linda Carrier was in fact not disabled and was not eligible to vote by mail,

COUNT FORTY-EIGHT

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Victoria Miller-Burns, to obtain a ballot under false pretenses, specifically:

Defendant caused the eligibility reason on Victoria Miller-Burns' mail ballot application to be marked "disability," when Victoria Miller-Burns was in fact not disabled and was not eligible to vote by mail,

COUNT FORTY-NINE

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Rayford Jordan, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Rayford Jordon's mail ballot application to be marked "disability," when Rayford Johnson was in fact not disabled and was not eligible to vote by mail,

COUNT FIFTY

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Terri Thomas, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Terri Thomas' mail ballot application to be marked "disability," when Terri Thomas was in fact not disabled and was not eligible to vote by mail,

COUNT FIFTY-ONE

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Andrew Erwin, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Andrew Erwin's mail ballot application to be marked "disability," when Andrew Erwin was in fact not disabled and was not eligible to vote by mail,

COUNT FIFTY-TWO

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 23rd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Robert Harvey Jr., to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Robert Harvey Jr.'s mail ballot application to be marked "disability," when Robert Harvey Jr. was in fact not disabled and was not eligible to vote by mail,

COUNT FIFTY-THREE

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Roceta Anderson to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Roceta Anderson's mail ballot application to be marked "disability," when Roceta Anderson was in fact not disabled and was not eligible to vote by mail,

COUNT FIFTY-FOUR

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Shannon Martin to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Shannon Martin's mail ballot application to be marked "disability," when Shannon Martin was in fact not disabled and was not eligible to vote by mail,

COUNT FIFTY-FIVE

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Jennifer Martin to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Jennifer Martin's mail ballot application to be marked "disability," when Jennifer Martin was in fact not disabled and was not eligible to vote by mail,

COUNT FIFTY-SIX

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Ricardo Pencheon to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Ricardo Pencheon's mail ballot application to be marked "disability," when Ricardo Pencheon was in fact not disabled and was not eligible to vote by mail,

COUNT FIFTY-SEVEN

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Kaylon Earl to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Kaylon Earl's mail ballot application to be marked "disability," when Kaylon Earl was in fact not disabled and was not eligible to vote by mail,

COUNT FIFTY-EIGHT

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Mary Lynn Odom to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Mary Lynn Odom's mail ballot application to be marked "disability," when Mary Lynn Odom was in fact not disabled and was not eligible to vote by mail,

COUNT FIFTY-NINE

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Roderick Smith, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Roderick Smith's mail ballot application to be marked

“disability,” when Roderick Smith was in fact not disabled and was not eligible to vote by mail,

COUNT SIXTY

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Athena Johnson, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Athena Johnson’s mail ballot application to be marked “disability,” when Athena Johnson was in fact not disabled and was not eligible to vote by mail,

COUNT SIXTY-ONE

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Loretta Faggans to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Loretta Faggans’ mail ballot application to be marked “disability,” when Loretta Faggans was in fact not disabled and was not eligible to vote by mail,

COUNT SIXTY-TWO

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Tiesean McCray, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Tiesean McCray’s mail ballot application to be marked “disability,” when Tiesean McCray was in fact not disabled and was not eligible to vote by mail,

COUNT SIXTY-THREE

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Otis Johnson, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Otis Johnson’s mail ballot application to be marked “disability,” when Otis Johnson was in fact not disabled and was not eligible to vote by mail,

COUNT SIXTY-FOUR

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Kenneth Pierson, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Kenneth Pierson’s mail ballot application to be marked “disability,” when Kenneth Pierson was in fact not disabled and was not eligible to vote by mail,

COUNT SIXTY-FIVE

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 1st day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Veronica Moore, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Veronica Moore's mail ballot application to be marked "disability," when Veronica Moore was in fact not disabled and was not eligible to vote by mail,

COUNT SIXTY-SIX

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 1st day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Aubrey Durham, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Aubrey Durham's mail ballot application to be marked "disability," when Aubrey Durham was in fact not disabled and was not eligible to vote by mail,

COUNT SIXTY-SEVEN

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 1st day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Beshad Faggans, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Beshad Faggans' mail ballot application to be marked "disability," when Beshad Faggans was in fact not disabled and was not eligible to vote by mail,

COUNT SIXTY-EIGHT

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 2nd day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Coby Johnson, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Coby Johnson's mail ballot application to be marked "disability," when Coby Johnson was in fact not disabled and was not eligible to vote by mail,

COUNT SIXTY-NINE

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 2nd day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Cason Johnson, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Cason Johnson's mail ballot application to be marked "disability," when Cason Johnson was in fact not disabled and was not eligible to vote by mail,

COUNT SEVENTY

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 14th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Keyannia Lister, to obtain a ballot under false pretenses, specifically: Defendant

caused the eligibility reason on Keyannia Lister's mail ballot application to be marked "disability," when Keyannia Lister was in fact not disabled and was not eligible to vote by mail,

COUNT SEVENTY-ONE

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 14th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Tamika Buchanan, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Tamika Buchanan's mail ballot application to be marked "disability," when Tamika Buchanan was in fact not disabled and was not eligible to vote by mail,

And it is further alleged that Defendant committed the offenses described in Counts Forty-One through Seventy-One in the March 6, 2018 Democratic primary election,

COUNT SEVENTY-TWO

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for voter Corby Martin, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT SEVENTY-THREE

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for voter Terri Thomas, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT SEVENTY-FOUR

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for voter Davonia Bradley, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT SEVENTY-FIVE

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for voter Victoria Miller-Burns, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT SEVENTY-SIX

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for voter Rayford Jordan, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT SEVENTY-SEVEN

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for voter Lorine Bagley, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT SEVENTY-EIGHT

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for voter Eric Taylor, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT SEVENTY-NINE

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for

voter Lorenzo Washington, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT EIGHTY

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for voter Yolita Johnson, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT EIGHTY-ONE

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for voter Andrew Erwin, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT EIGHTY-TWO

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 23rd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for voter Robert Harvey Jr., with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT EIGHTY-THREE

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for voter Shannon Martin, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT EIGHTY-FOUR

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for voter Jennifer Martin, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT EIGHTY-FIVE

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for voter Roceta Anderson, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT EIGHTY-SIX

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for voter Kaylon Earl, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT EIGHTY-SEVEN

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 25th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority, and candidate Kasha Williams, an application for ballot by mail for voter Ricardo Pencheon, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT EIGHTY-EIGHT

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud a voter, Elizabeth Choice, the Gregg County election authority, and candidate Kasha Williams, an

application for ballot by mail for voter Elizabeth Choice, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: Defendant forged the voter's signature on an application for ballot by mail before submitting it to the election office,

COUNT EIGHTY-NINE

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for voter Tiesen McCray, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT NINETY

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for voter Otis Jones, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT NINETY-ONE

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for voter Athena Johnson, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT NINETY-TWO

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 26th day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for voter Kenneth Pierson, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT NINETY-THREE

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 1st day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for voter Veronica Moore, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT NINETY-FOUR

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 1st day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud, the Gregg County election authority and candidate Kasha Williams an application for ballot by mail for voter Beshad Faggans, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT NINETY-FIVE

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 2nd day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for voter Coby Johnson, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT NINETY-SIX

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 2nd day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for voter Cason Johnson, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

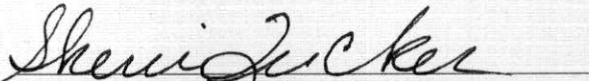
COUNT NINETY-SEVEN

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 14th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for

voter Tamika Buchanan, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

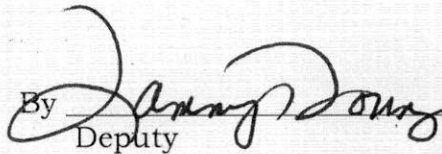
AGAINST THE PEACE AND DIGNITY OF THE STATE.


Foreperson of the Grand Jury

THE STATE OF TEXAS
COUNTY OF GREGG

I, Trey Hattaway, Clerk of the District Court within and for the County and State aforesaid, do hereby certify that the foregoing contains a true and correct copy of the Indictment in Cause No. 50949-B, of the State of Texas vs. MARLENA ROSANNE JACKSON as now on file in this office.

IN TESTIMONY WHEREOF I hereto set my hand and seal, this 23rd day of Sept., A.D. 2020.

By 
Deputy

Trey Hattaway
Clerk of the District Court
Gregg County, Texas

WITNESSES

INDICTMENT

CAUSE NO. 50953-B

THE STATE OF TEXAS vs. SHANNON EVERETTE BROWN

DOB: 10/20/1970

OFFENSE: COUNT ONE: ENGAGING IN ORGANIZED ELECTION FRAUD (F2)
COUNTS TWO – EIGHT: FRAUDULENT USE OF MAIL BALLOT APPLICATION ENHANCED (F3)
COUNTS NINE – TEN: UNLAWFUL POSSESSION OF BALLOT/BALLOT ENVELOPE ENHANCED (SJF)
COUNTS ELEVEN – EIGHTEEN: ELECTION FRAUD ENHANCED (SJF)
COUNTS NINETEEN – TWENTY-THREE: TAMPERING WITH A GOVERNMENTAL RECORD WITH INTENT TO HARM OR DEFRAUD (SJF)

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

THE GRAND JURORS, duly selected, empaneled, sworn, charged, and organized as such for the County of Gregg, State of Texas, at the July-December, 2020 term of the 188th District Court for said County, upon their oaths present in and to said Court that from on or about the 22nd day of January A.D., 2018 and continuing until on or about the 6th day of March A.D., 2018, and anterior to the presentment of this Indictment, in the County and State aforesaid, SHANNON EVERETTE BROWN, hereinafter called Defendant, did then and there,

COUNT ONE

Engaging in Organized Election Fraud (F2)

with the intent to establish, maintain, and participate in a vote harvesting organization, said organization consisting of Shannon Brown, Marlana Jackson, Dewayne Ward, and Charlie Burns, who collaborated in committing election offenses under Titles 1 through 7 of the Texas Election Code, knowingly commit the offenses of illegal voting, unlawful assistance, fraudulent use of a mail ballot application multiple times in the same election, unlawful possession of a ballot or carrier envelope of another multiple times in the same election, and unlawfully assisting a voter voting a ballot by mail, by committing said offenses as the primary actor or by acting with the intent to promote or assist the commission of said offenses by soliciting, encouraging, directing, aiding, or attempting to aid members of said organization to commit said offenses,

COUNT TWO

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant on or about the 22nd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Davonia Bradley, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT THREE

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Yolita Johnson, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT FOUR

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Terri Thomas, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT FIVE

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Ricky Johnson, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT SIX

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 22nd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Eric Taylor, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT SEVEN

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 23rd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Robert Harvey Jr., specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT EIGHT

Fraudulent Use of Mail Ballot Application Enhanced (F3)

And further that Defendant, on or about the 1st day of February A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Veronica Moore, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

And it is further alleged that Defendant committed the offenses described in Counts Two through Eight in the same election,

COUNT NINE

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 17th day of February A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or carrier envelope of a voter, Davonia Bradley,

COUNT TEN

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 6th day of March A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or carrier envelope of a voter, Tamika Buchanan,

And it is further alleged that Defendant committed the offenses described in Counts Nine and Ten in the same election,

COUNT ELEVEN

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 12th day of February A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there, while in the presence of the ballot and during the voting process, knowingly make an effort to influence the independent exercise of the vote of Linda Carrier, specifically: Defendant influenced Linda Carrier to vote for candidate Shannon Brown for Gregg County Commissioner, Precinct 4,

COUNT TWELVE

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Yolita Johnson, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Yolita Johnson's mail ballot application to be marked "disability," when Yolita Johnson was in fact not disabled and was not eligible to vote by mail,

COUNT THIRTEEN

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Terri Thomas, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Terri Thomas' mail ballot application to be marked "disability," when Terri Thomas was in fact not disabled and was not eligible to vote by mail,

COUNT FOURTEEN

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Davonia Bradley to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Davonia Bradley's mail ballot application to be marked "disability," when Davonia Bradley was in fact not disabled and was not eligible to vote by mail,

COUNT FIFTEEN

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Eric Taylor, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Eric Taylor's mail ballot application to be marked "disability," when Eric Taylor was in fact not disabled and was not eligible to vote by mail,

COUNT SIXTEEN

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 23rd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Robert Harvey Jr., to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Robert Harvey Jr's mail ballot application to be marked "disability," when Robert Harvey Jr. was in fact not disabled and was not eligible to vote by mail,

COUNT SEVENTEEN

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 1st day of February 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Veronica Moore, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Veronica Moore's mail ballot application to be marked "disability," when Veronica Moore was in fact not disabled and was not eligible to vote by mail,

COUNT EIGHTEEN

Election Fraud Enhanced (SJF)

And further that Defendant, on or about the 14th day of February A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Tamika Buchanan, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Tamika Buchanan's mail ballot application to be marked "disability," when Tamika Buchanan was in fact not disabled and was not eligible to vote by mail,

And it is further alleged that Defendant committed the offenses described in Counts Eleven through Eighteen in the same election,

COUNT NINETEEN

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for voter Terri Thomas, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT TWENTY

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for voter Yolita Johnson, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT TWENTY-ONE

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams an application for ballot by mail for voter Davonia Bradley, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled.

COUNT TWENTY-TWO

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 23rd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for voter Robert Harvey Jr., with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

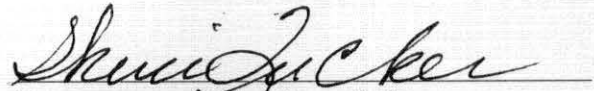
COUNT TWENTY-THREE

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 14th day of February A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for

voter Tamika Buchanan, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

AGAINST THE PEACE AND DIGNITY OF THE STATE.


Foreperson of the Grand Jury

THE STATE OF TEXAS
COUNTY OF GREGG

I, Trey Hattaway, Clerk of the District Court within and for the County and State aforesaid, do hereby certify that the foregoing contains a true and correct copy of the Indictment in Cause No. 50953-B, of the State of Texas vs. SHANNON EVERETTE BROWN as now on file in this office.

IN TESTIMONY WHEREOF I hereto set my hand and seal, this 23rd day of Sept., A.D. 2020.

By Jammy D. [Signature]
Deputy

Trey Hattaway
Clerk of the District Court
Gregg County, Texas

WITNESSES

INDICTMENT

CAUSE NO. 50951-B

THE STATE OF TEXAS vs. CHARLIE BURNS, JR.

DOB: 06/09/1936

OFFENSE: COUNT ONE - ENGAGING IN ORGANIZED ELECTION FRAUD (F3)
COUNT TWO - FRAUDULENT USE OF APPLICATION FOR BALLOT BY MAIL (SJF)
COUNTS THREE - SEVEN - POSSESSION OF A BALLOT OR CARRIER ENVELOPE ENHANCED (SJF)
COUNT EIGHT - TAMPERING WITH A GOVERNMENTAL RECORD WITH INTENT TO HARM OR DEFRAUD (SJF)

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

THE GRAND JURORS, duly selected, empaneled, sworn, charged, and organized as such for the County of Gregg, State of Texas, at the July-December, 2020 term of the 188th District Court for said County, upon their oaths present in and to said Court that from on or about the 22nd day of January A.D., 2018 and continuing until on or about the 6th day of March A.D., 2018, and anterior to the presentment of this Indictment, in the County and State aforesaid, CHARLIE BURNS, JR., hereinafter called Defendant, did then and there

COUNT ONE

Engaging in Organized Election Fraud (F3)

with the intent to establish, maintain, and participate in a vote harvesting organization, said organization consisting of Shannon Brown, Marlena Jackson, Dewayne Ward, and Charlie Burns, who collaborated in carrying on election offenses under Titles 1 through 7 of the Texas Election Code, knowingly commit the offenses of fraudulent use of a mail ballot application and possessing a ballot or carrier envelope of another multiple times in the same election, by acting with the intent to promote or assist the commission of said offense by soliciting, encouraging, directing, aiding, or attempting to aid members of said organization to commit said offense,

COUNT TWO

Fraudulent Use of Application for Ballot by Mail (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Davonia Bradley, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT THREE

Possession of a Ballot or Carrier Envelope Enhanced (SJF)

And further that Defendant, on or about the 16th of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Otis Jones,

COUNT FOUR

Possession of a Ballot or Carrier Envelope Enhanced (SJF)

And further that Defendant, on or about the 17th of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Natasha Bush,

COUNT FIVE

Possession of a Ballot or Carrier Envelope Enhanced (SJF)

And further that Defendant, on or about the 17th of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Davonia Bradley,

COUNT SIX

Possession of a Ballot or Carrier Envelope Enhanced (SJF)

And further that Defendant, on or about the 17th of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Veronica Moore,

COUNT SEVEN

Possession of a Ballot or Carrier Envelope Enhanced (SJF)

And further that Defendant, on or about the 22nd day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Roceta Anderson,

And it is further alleged that Defendant committed the offenses described in Counts Three through Seven in the March 6, 2018 Democratic primary election,

COUNT EIGHT

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams an application for ballot by mail for voter Davonia Bradley, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

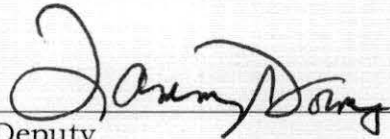
A handwritten signature in cursive script that reads "Sherie Zucker". The signature is written in black ink and is positioned above a horizontal line.

Foreperson of the Grand Jury

THE STATE OF TEXAS
COUNTY OF GREGG

I, Trey Hattaway, Clerk of the District Court within and for the County and State aforesaid, do hereby certify that the foregoing contains a true and correct copy of the Indictment in Cause No. 50951-B, of the State of Texas vs. CHARLIE BURNS, JR. as now on file in this office.

IN TESTIMONY WHEREOF I hereto set my hand and seal, this 23rd day of Sept., A.D. 2020.

By 
Deputy

Trey Hattaway
Clerk of the District Court
Gregg County, Texas

WITNESSES

INDICTMENT

CAUSE NO. 50947-B

THE STATE OF TEXAS vs. DEWAYNE WARD

DOB: 09/28/1961

OFFENSE: COUNT ONE - ENGAGING IN ORGANIZED ELECTION FRAUD (F1)
COUNT TWO - UNLAWFUL POSSESSION OF BALLOT/BALLOT ENVELOPE WITHOUT REQUEST OF VOTER ENHANCED (F2)
COUNTS THREE - SIX - UNLAWFUL POSSESSION OF BALLOT/BALLOT ENVELOPE (SJF)

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

THE GRAND JURORS, duly selected, empaneled, sworn, charged, and organized as such for the County of Gregg, State of Texas, at the July-December, 2020 term of the 188th District Court for said County, upon their oaths present in and to said Court that from on or about the 22nd day of January A.D., 2018 and continuing until on or about the 6th day of March A.D., 2018, and anterior to the presentment of this Indictment, in the County and State aforesaid, DEWAYNE WARD, hereinafter called Defendant, did then and there

COUNT ONE

Engaging in Organized Election Fraud (F1)

DEWAYNE WARD, hereinafter styled Defendant, from on or about the 22nd day of January A.D., 2018 and continuing until on or about the 6th day of March A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there, with the intent to establish, maintain, and participate in a vote harvesting organization, said organization consisting of Shannon Brown, Marlena Jackson, Dewayne Ward, and Charlie Burns, who collaborated in carrying on election offenses under Titles 1 through 7 of the Texas Election Code, knowingly commit, multiple times in the same election, the offenses of unlawful possession of a ballot or carrier envelope without the request of the voter and unlawful possession of a ballot or carrier envelope of another, by committing said offenses as the primary actor or by acting with intent to promote or assist the commission of said offenses by soliciting, encouraging, directing, aiding, or attempting to aid members of said organization to commit said offenses,

COUNT TWO

Unlawful Possession of Ballot/Ballot Envelope without Request of Voter Enhanced (F2)

And further that Defendant, on or about the 6th day of March A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Tamika Buchanan, without the request of the voter,

COUNT THREE

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 24th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Mary Lynn Odom,

COUNT FOUR

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 26th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Aubrey Durham,

COUNT FIVE

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 6th day of March A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Keyannia Lister,

COUNT SIX

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 6th day of March A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Roderick Smith,

And it is further alleged that Defendant committed the offenses described in Counts Two through Six in the March 6, 2018 Democratic primary election,

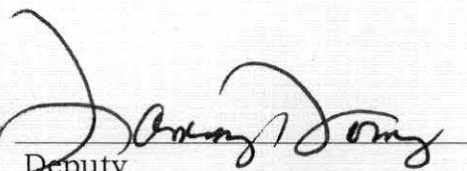
AGAINST THE PEACE AND DIGNITY OF THE STATE.


Foreperson of the Grand Jury

THE STATE OF TEXAS
COUNTY OF GREGG

I, Trey Hattaway, Clerk of the District Court within and for the County and State aforesaid, do hereby certify that the foregoing contains a true and correct copy of the Indictment in Cause No. 50947-B, of the State of Texas vs. DEWAYNE WARD as now on file in this office.

IN TESTIMONY WHEREOF I hereto set my hand and seal, this 23rd day of Sept., A.D. 2020.

By 
Deputy

Trey Hattaway
Clerk of the District Court
Gregg County, Texas

WITNESSES

