

The State of Texas



Elections Division
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Rolando B. Pablos
Secretary of State

August 31, 2017

Mr. David Maxwell
Director of Law Enforcement
Office of the Attorney General
P.O. Box 12548
Austin, Texas 78711

Dear Mr. Maxwell,

Pursuant to Section 31.006 of the Texas Election Code, I respectfully request your assistance in reviewing allegations of criminal activity in connection with the creation of Montgomery County Water Control and Improvement District Number 4. Please find the enclosed copies of several election complaints submitted by several voters in Montgomery County.

The complaint alleges that voter registered to vote in the district when they did not reside in the district.

Voting illegally is discussed under section 64.012 of the Texas Election Code. A person is not permitted to knowingly vote in an election in which the person is not eligible to vote. A violation of section 64.012 of the Texas Election Code is a felony of the second degree unless the person is convicted of an attempt. In that case, the offense is a state jail felony. Additionally, providing false information on a voter registration application is prohibited by section 13.007 of the Texas Election Code. A violation of section 13.007 is a Class B misdemeanor. The complaint alleges that Baja Interest, Inc., paid Ms. Alisha Horn, Mr. Gerald Thibedeau, Mr. Jeffery Thibedeau and Ms. Krystal Thibedeau to register and vote in the district, when none of the individuals resided in the district.

After review of the submitted documentation, we believe the information regarding offenses warrants a submission for criminal investigation to the Texas Attorney General as the specific allegations described involve potential a misdemeanor offense. Accordingly, under Section 31.006 of the Code, we are forwarding this complaint to the Attorney General for investigation.

Sincerely,

A handwritten signature in black ink, appearing to read "Caroline Geppert", written over a horizontal line.

Caroline Geppert
Interim Legal Director – Elections Division

cc: Mr. James Doyle
16728 Bending Oaks
Conroe, Texas 77385