

The State of Texas



Elections Division
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Rolando B. Pablos
Secretary of State

July 27, 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 Municipal District Number 148, Montgomery County Municipal District Number 130 and Montgomery County Municipal District Number 131. Please find the enclosed copies of several election complaints submitted by several voters in Montgomery County.

The complaints allege that voters were paid to reside in and vote for the creation of these municipal utility districts, as well as to pass bonds in the districts.

Offering a benefit for the act of voting is discussed under section 36.02 of the Texas Penal Code. An individual is not permitted to knowingly or intentionally offer any benefit to a voter for voting. The complaints allege that for each of the mentioned municipal utility districts, that Stingray Services, LLC. paid for voters to reside in and vote for both the creation of the districts as well as bonds in each district. A violation of section 36.02 of the Texas Penal Code is a felony of the second degree.

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 "Keith Ingram".

Keith Ingram
Director of Elections

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