

ELECTION COMPLAINT TO THE TEXAS SECRETARY OF STATE

Docket Number	OFFICE USE ONLY	Date Hand-delivered or Date Postmarked / /
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Please read the Important Information at the end of this document. The Secretary of State has no authority to order a new election, change an election result, or conduct a criminal investigation. A complaint filed with this form will not alter the results of an election.

This complaint form MUST BE SIGNED before it is submitted to the Secretary of State; therefore, you must print it out and sign it before mailing or faxing a copy or emailing a scanned, signed copy.

I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME	MS / MRS / MR	FIRST Ms. Colleen	MI M
	NICKNAME	LAST Vera	SUFFIX
2 COMPLAINANT PHYSICAL ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)	CITY Houston	STATE ZIP CODE TX 77084
<small>(Full home or business address, including street, city, state, and zip code)</small>			
3 COMPLAINANT MAILING ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)	CITY	STATE ZIP CODE
<input checked="" type="checkbox"/> (check if same as above)	<small>(Full home or business address, including street, city, state, and zip code)</small>		
4 COMPLAINANT TELEPHONE NUMBER	AREA CODE PHONE NUMBER EXT (281) 948-4521	5 COMPLAINANT E-MAIL ADDRESS	colleenmvera@yahoo.com

II. IDENTITY OF RESPONDENT

PERSON OR ENTITY COMMITTING ALLEGED VIOLATION(S)

6 RESPONDENT NAME	MS / MRS / MR	FIRST See attached	MI
	NICKNAME	LAST	SUFFIX
7 RESPONDENT POSITION OR TITLE			
8 RESPONDENT PHYSICAL ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)	CITY	STATE ZIP CODE
<small>(Full home or business address, including street, city, state, and zip code)</small>			
9 RESPONDENT MAILING ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)	CITY	STATE ZIP CODE
<input type="checkbox"/> (check if same as above)	<small>(Full home or business address, including street, city, state, and zip code)</small>		
10 RESPONDENT TELEPHONE NUMBER	AREA CODE PHONE NUMBER EXT	11 RESPONDENT E-MAIL ADDRESS	(IF KNOWN)

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III. NATURE OF ALLEGED VIOLATION**Page2**

If you believe that a criminal violation of the Code has occurred, please state the specific acts committed by the person or entity named in this complaint, along with a reference to the section of the Code alleged to have been violated, if known. If you need more space, please attach a separate sheet.

It appears that harvesting of ballots by mail occurred in Harris County during the 2018 Democratic Primary, especially in Precinct #0259, and that this activity may have begun in 2008.

Multiple similarities found in the ballot by mail applications, the ballot carrier envelopes, as well as the actual ballots themselves are too great to be coincidence.

Convicted forgers obtaining large batches of ballot by mail applications as well as convicted forgers being paid by campaigns and/or PACs supplying workers or services to campaigns increases the probability that organized mailed ballot fraud may be occurring.

Local officials cannot investigate these allegations without creating a clear conflict of interest. That is because campaign records show that many of these local officials have directly or indirectly employed one or more persons convicted of forgery in their own campaigns.

Therefore, I am requesting that this information be forwarded to the Texas Attorney General for investigation.

The voters involved need to be interviewed to confirm who assisted them with their applications and/or mailed ballots.

ATTACH ADDITIONAL PAGES AS NEEDED

IV. STATEMENT OF FACTS

Page 3-A

State the facts constituting the alleged violation(s), including the dates on which or the period of time in which the alleged violation(s) occurred. Identify allegations of fact not personally known to the complainant, but alleged on information and belief. Please use simple, concise, and direct statements.

ELECTION IN WHICH VIOLATION(S) OCCURRED

NAME OF ELECTION Democratic Party Primary DATE OF ELECTION 3 / 6 / 2018
MM/DD/YYYY

COUNTY OR POLITICAL SUBDIVISION Harris County PRECINCT #0259 +

1. The video posted by Direct Action Texas exposed the possibility of fraud in the 2018 Harris County Democratic Primary Election which led me to file public information requests (PIRs) for the mail ballot applications, ballot carrier envelopes, and signature verification documents used in that race. (Exhibit #1)
2. In reviewing the applications, I found three sets of applications with disturbingly similar handwriting. These sets also had strong similarities in envelopes, stamps, and precinct number – mainly #0259. I titled the sets:
 - alleged harvester A (Exhibit #3)
 - alleged harvester B (Exhibit #4)
 - alleged harvester C (Exhibit #5)
3. In reviewing the signature verification documents provided in my PIRs, I found similar handwriting on applications back as far as 2008 for alleged harvester A. (Exhibits #3d, #3e, #3f + #3g)
4. The audio made available by Jasen Rabalais, led me to believe that if harvesting did occur, there may have been competing entities urging the voters to file multiple applications. (Exhibit #2)
5. So I filed another PIR for “all” mail ballot applications related to the voter names on the A list. I now believe that I have found all the applications from set A. (I am still in the process of filing PIRs related to the all voter names in B and C.)
6. To see if I could find a similar repetitive pattern in the ballots themselves, I filed a PIR for copies of the mail ballots from 11 precincts – those covered by voters in A, B and C as well as some surrounding precincts in Harold Dutton’s district. I chose Precincts #0047, #0048, #0138, #0145, #0253, #0259, #0353, #0455, #0580, #0582, #0606. (Note: I could not afford a PIR for copies of all the ballots in the race.)
7. I had to wait until the ballots were available for public viewing – 22 months after the election – which was January of 2020.
8. The pattern found in the ballots came from Precinct #0259. With 107 candidates and propositions on the ballot, Precinct #0259 had 30 identical ballots. Even the check marks used were identical. I could not find the same voting pattern on any ballot from the other precincts we copied. There were also 2 ballots which were identical to the 30 except for one race which was marked differently. Consequently, alleged harvester A had 32 applications from Precinct #0259. The numbers are too close to just pass off as coincidence. (Exhibits #6a + #6b)
9. From Precinct #0259 I also found 6 sets of ballots where 2 voters marked the exact same candidates. I don’t find this concerning. It could be two voters in a household voting the same or simply a coincidence. (Exhibit #6c)

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ELECTION IN WHICH VIOLATION(S) OCCURRED

NAME OF ELECTION Democratic Party Primary DATE OF ELECTION 3 / 6 / 2018
COUNTY OR POLITICAL SUBDIVISION Harris County PRECINCT #0259 +

10. One ballot each was found in Precincts #0047, #0580, and #0606 in which the voter chose only 2 of the 97 candidates on the ballot – Harold Dutton and Sheila Jackson Lee. The other candidates on the ballot were left blank. Those ballots support the video evidence in #1. (Exhibit #7)
11. The ballot applications used by A, B and C appeared to be the type made available by the Harris County Clerk’s Office, so I filed a PIR for the list of persons who picked up large batches of applications in 2018. I received a copy of the sign out sheet for 2018. (Exhibit #8a)
12. It’s very suspicious that the woman who was taped in #4 explaining her harvesting services, not only has a previous forgery conviction, but was the first person to pick up a batch of applications from the County Clerk’s Office in 2018. On 1/5/2018 she picked up 50 for the Sheila Jackson Lee campaign. On 8/22/2018 she had 250 more picked up in her name. (Exhibits #2, #8a, #8b)
13. It is also very concerning that the third person who picked up a batch of 50 ballots from the County Clerk’s Office in 2018 likewise had a previous forgery conviction. She picked up applications for the Sharon Burney campaign on 1/11/18. (Exhibits #8a + #8b)
14. The fourth batch of 50 applications picked up from the County Clerk’s Office in 2018 was for Deborah Adams. Writing samples from provisional ballots completed by Deborah Adams when she served as the Election Judge for Precinct #0259 appear to match the writing samples of alleged harvester A. (Exhibits #3h + #8a)
15. After finding two persons with previous forgery convictions picking up large batches of ballot by mail applications from the County Clerk’s Office for local campaigns, I decided to find out how wide spread the practice of Harris County campaigns paying convicted forgers might be. I found so many elected officials who have either:
 - paid convicted forgers with campaign funds,
 - paid a PAC with campaign funds which in turn has convicted forgers on the PAC’s payroll, and/or
 - accepted “in kind” donations of campaign personnel from a PAC which pays convicted forgers

that I do not feel our local officials can investigate these allegations without a clear conflict of interest. I have included examples of all three. (Exhibits #9a + #9b)

ATTACH ADDITIONAL PAGES AS NEEDED

V. LISTING OF DOCUMENTS AND OTHER MATERIALS

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List all documents and other materials filed with this complaint. Additionally, list all other documents and other materials that are relevant to this complaint and that are within your knowledge, including their location, if known.

1. Link to a video posted by Direct Action Texas during the 2018 Primary in Harris County where a woman claiming to be with Texas Representative Harold Dutton's campaign appears to be harvesting a mail ballot:
<https://www.youtube.com/watch?v=xhQ7ngFqLSc>
2. Audio recording made by Jasen Rabalais' campaign (Harris County Constable, Precinct 3) during the 2016 Democratic Primary. In it, Gloria Palmer, a convicted forger being paid by one of his opponents (Michel Pappillion), explains the mailed ballot harvesting service she provides to campaigns.
3. Documents related to alleged "Harvester A":
 - a. Ballot by mail applications from the 2018 Democratic Primary
 - b. Ballot carrier envelopes from the 2018 Democratic Primary
 - c. Summary sheet of similarities/concerns
 - d. Ballot by mail applications from 2016
 - e. Ballot carrier envelopes from 2016 (Primary and Primary Run-Off)
 - f. Ballot by mail applications from 2009
 - g. Ballot by mail applications from 2008
 - h. Similar writing samples
4. Documents related to alleged "Harvester B":
 - a. Ballot by mail applications from the 2018 Democratic Primary
 - b. Ballot carrier envelopes from the 2018 Democratic Primary
 - c. Summary sheet of similarities/concerns
 - d. Similar writing samples
5. Documents related to alleged "Harvester C":
 - a. Ballot by mail applications from the 2018 Democratic Primary
 - b. Ballot carrier envelopes from the 2018 Democratic Primary
 - c. Summary sheet of similarities/concerns
6. Mail ballot images from the 2018 Democratic Primary in Harris County Precinct #0259:
 - a. 30 Ballots voting for same candidates
 - b. 2 ballots with only one race marked differently from the 30 ballots in "a"
 - c. 6 sets of ballots where 2 ballots marked the same candidates
7. Three mail ballot images from the 2018 Democratic Primary showing voters from Precincts #0047, #0580 and #0606 voting for only 2 of the 90+ candidates on the ballot: TX Rep. Harold Dutton and US Rep. Sheila Jackson Lee
8. Persons picking up large numbers of mail ballot applications in Harris County in 2018:
 - a. Sign out sheet from the Harris County Clerk's Office of persons picking up batches of 50 to 100 ballot by mail applications during 2018.
 - b. Forgery conviction records for persons signing lines #1 and #3 of "a"
9. Samples of convicted forgers working campaigns in Harris County:
 - a. Convicted forgers paid directly by campaigns
 - b. Convicted forgers paid by PAC and/or organization

NOTE: I have finished researching alleged harvester "A," but I am still filing public information requests to collect all the applications for mail ballots which may be associated with alleged harvesters "B" and "C."

ATTACH ADDITIONAL PAGES AS NEEDED

VI. SIGNED STATEMENT**Page 5**

Colleen M Vera
I, _____, the undersigned,

PRINTED NAME OF COMPLAINANT

under penalty of perjury do swear or affirm that the information contained in this complaint is true and correct to the best of my knowledge.

I have read and understand the accompanying instructions, and I am aware that completion of this form cannot and will not alter the outcome of the election.



SIGNATURE OF COMPLAINANT

**NOTICE: THIS COMPLAINT IS NOT CONFIDENTIAL; ONCE REVIEWED BY
THE SECRETARY OF STATE, IT WILL BE TREATED AS A PUBLIC RECORD.**

REMINDER: YOU MUST SIGN THIS FORM PRIOR TO SUBMITTING**IF MAILING, PLEASE SEND TO:**

Texas Secretary of State
Elections Division
c/o Legal Dept.
P.O. Box 12060
Austin, TX 78711

IF FAXING, PLEASE SEND TO:

512.475.2811

IF EMAILING, PLEASE SEND TO:

elections@sos.texas.gov