

August 19, 2025

To:

Hood County District Attorney and Hood County Attorney
100 E. Pearl Street Granbury, TX 76048

From:

Cheryl Shadden
8405 Contrary Creek Road
Granbury, TX 76048
(817) 313-2521
cherylshadden@yahoo.com

**Re: Request for Investigation – Election Interference and Official Misconduct in
Mitchell Bend Incorporation Petition**

Dear District Attorney and County Attorney:

Please find enclosed my formal complaint regarding election interference and official misconduct surrounding the Mitchell Bend incorporation petition in Hood County, Texas. This complaint concerns actions taken by Judge Ron Massingill after receiving direct instructions from Marathon Digital Holdings' attorneys, Nelson Mullins Riley & Scarborough LLP, which resulted in the unlawful invalidation of a lawful incorporation petition without notice to applicants.

The enclosed complaint details the facts, cites relevant statutes, and attaches as Exhibit A the August 5, 2025 letter from Marathon's attorneys. I respectfully request your office to investigate and take corrective or enforcement action as appropriate.

Respectfully submitted,

Cheryl Shadden
Granbury, Texas

August 19, 2025

To:

Texas Attorney General Ken Paxton
Office of the Attorney General P.O. Box 12548 Austin, TX 78711-2548

From:

Cheryl Shadden
8405 Contrary Creek Road
Granbury, TX 76048
(817) 313-2521
cherylshadden@yahoo.com

**Re: Request for Investigation – Election Interference and Official Misconduct in
Mitchell Bend Incorporation Petition**

Dear Attorney General Paxton:

Please find enclosed my formal complaint regarding election interference and official misconduct surrounding the Mitchell Bend incorporation petition in Hood County, Texas. This complaint concerns actions taken by Judge Ron Massingill after receiving direct instructions from Marathon Digital Holdings' attorneys, Nelson Mullins Riley & Scarborough LLP, which resulted in the unlawful invalidation of a lawful incorporation petition without notice to applicants.

The enclosed complaint details the facts, cites relevant statutes, and attaches as Exhibit A the August 5, 2025 letter from Marathon's attorneys. I respectfully request your office to investigate and take corrective or enforcement action as appropriate.

Respectfully submitted,

Cheryl Shadden
Granbury, Texas

August 19, 2025

To:

Texas Rangers Public Integrity Unit

Public Integrity Unit Texas Department of Public Safety P.O. Box 4087 Austin, TX 78773

From:

Cheryl Shadden

8405 Contrary Creek Road

Granbury, TX 76048

(817) 313-2521

cherylshadden@yahoo.com

**Re: Request for Investigation – Election Interference and Official Misconduct in
Mitchell Bend Incorporation Petition**

Dear Director and Members of the Public Integrity Unit:

Please find enclosed my formal complaint regarding election interference and official misconduct surrounding the Mitchell Bend incorporation petition in Hood County, Texas. This complaint concerns actions taken by Judge Ron Massingill after receiving direct instructions from Marathon Digital Holdings' attorneys, Nelson Mullins Riley & Scarborough LLP, which resulted in the unlawful invalidation of a lawful incorporation petition without notice to applicants.

The enclosed complaint details the facts, cites relevant statutes, and attaches as Exhibit A the August 5, 2025 letter from Marathon's attorneys. I respectfully request your office to investigate and take corrective or enforcement action as appropriate.

Respectfully submitted,

Cheryl Shadden

Granbury, Texas

August 19, 2025

To:

Texas Secretary of State – Elections Division

Elections Division Texas Secretary of State P.O. Box 12060 Austin, TX 78711-2060

From:

Cheryl Shadden

8405 Contrary Creek Road

Granbury, TX 76048

(817) 313-2521

cherylshadden@yahoo.com

**Re: Request for Investigation – Election Interference and Official Misconduct in
Mitchell Bend Incorporation Petition**

Dear Director of Elections:

Please find enclosed my formal complaint regarding election interference and official misconduct surrounding the Mitchell Bend incorporation petition in Hood County, Texas. This complaint concerns actions taken by Judge Ron Massingill after receiving direct instructions from Marathon Digital Holdings' attorneys, Nelson Mullins Riley & Scarborough LLP, which resulted in the unlawful invalidation of a lawful incorporation petition without notice to applicants.

The enclosed complaint details the facts, cites relevant statutes, and attaches as Exhibit A the August 5, 2025 letter from Marathon's attorneys. I respectfully request your office to investigate and take corrective or enforcement action as appropriate.

Respectfully submitted,

Cheryl Shadden

Granbury, Texas

August 19, 2025

To:

Texas Commission on Judicial Conduct
P.O. Box 12265 Austin, TX 78711-2265

From:

Cheryl Shadden
8405 Contrary Creek Road
Granbury, TX 76048
(817) 313-2521
cherylshadden@yahoo.com

**Re: Request for Investigation – Election Interference and Official Misconduct in
Mitchell Bend Incorporation Petition**

Dear Commissioners:

Please find enclosed my formal complaint regarding election interference and official misconduct surrounding the Mitchell Bend incorporation petition in Hood County, Texas. This complaint concerns actions taken by Judge Ron Massingill after receiving direct instructions from Marathon Digital Holdings' attorneys, Nelson Mullins Riley & Scarborough LLP, which resulted in the unlawful invalidation of a lawful incorporation petition without notice to applicants.

The enclosed complaint details the facts, cites relevant statutes, and attaches as Exhibit A the August 5, 2025 letter from Marathon's attorneys. I respectfully request your office to investigate and take corrective or enforcement action as appropriate.

Respectfully submitted,

Cheryl Shadden
Granbury, Texas

August 19, 2025

To:

U.S. Department of Justice – Civil Rights Division (Voting Section)
Voting Section Civil Rights Division U.S. Department of Justice 950 Pennsylvania Avenue,
NW Washington, DC 20530

From:

Cheryl Shadden
8405 Contrary Creek Road
Granbury, TX 76048
(817) 313-2521
cherylshadden@yahoo.com

**Re: Request for Investigation – Election Interference and Official Misconduct in
Mitchell Bend Incorporation Petition**

Dear Chief, Voting Section:

Please find enclosed my formal complaint regarding election interference and official misconduct surrounding the Mitchell Bend incorporation petition in Hood County, Texas. This complaint concerns actions taken by Judge Ron Massingill after receiving direct instructions from Marathon Digital Holdings' attorneys, Nelson Mullins Riley & Scarborough LLP, which resulted in the unlawful invalidation of a lawful incorporation petition without notice to applicants.

The enclosed complaint details the facts, cites relevant statutes, and attaches as Exhibit A the August 5, 2025 letter from Marathon's attorneys. I respectfully request your office to investigate and take corrective or enforcement action as appropriate.

Respectfully submitted,

Cheryl Shadden
Granbury, Texas

Main Complaint

I write to formally request investigation and appropriate enforcement action regarding election interference and official misconduct surrounding the Mitchell Bend incorporation petition.

Factual Background

1. On May 2, 2025, Hood County Judge Ron Massingill signed and approved the Mitchell Bend incorporation petition for placement on the November 4, 2025 ballot.
2. On August 5, 2025, attorneys for Marathon Digital Holdings, Nelson Mullins Riley & Scarborough LLP, sent a letter to Judge Massingill requesting that he vacate the order approving the petition. (Attached as Exhibit A).
3. On August 12, 2025, during open comments at the Hood County Commissioners Court (video publicly available on YouTube), Judge Massingill admitted that he had unilaterally invalidated the incorporation petition without notice to the applicants the day before (August 11, 2025).
 - Judge Massingill did not notify the applicants of his action.
 - It remains unclear whether Judge Massingill filed any written order of invalidation or transmitted notice to the Elections Administrator, County Attorney, or any other county entity.
 - Only after being questioned in Commissioners Court did Judge Massingill acknowledge his action.
4. After public exposure, Judge Massingill later re-signed the same first application and signed a second application, an acknowledgment that his initial action was unlawful.

Legal Concerns and Potential Violations

- Improper Influence (Texas Penal Code §36.04).
- Abuse of Official Capacity (Texas Penal Code §39.02).
- Official Oppression (Texas Penal Code §39.03).
- Election Interference (Texas Election Code §273.001).

Unanswered Questions Requiring Investigation

1. On what date did Judge Massingill formally invalidate the first application?
2. Was a written order entered or filed with the County Clerk, Elections Administrator, or any county record?
3. Why were the applicants never notified?
4. Did Judge Massingill communicate directly with Marathon's attorneys or provide them notice of his action?
5. Did any other county officials participate in or have knowledge of this invalidation?

Conclusion

The right of Mitchell Bend residents to vote on incorporation is a fundamental election matter. Judge Massingill's actions deprived voters of their rights without notice and at the request of a corporate entity with no legal standing in the incorporation process.

Immediate investigation and corrective action are necessary to restore public trust.

Respectfully submitted,

Cheryl Shadden
Granbury, Texas

Exhibit A – Nelson Mullins Letter (August 5, 2025)

