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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

October 20, 2026

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

CARMEN PATRICE TURNER (1),
SHEMERRYLYN REGINA FIELDS (2),
VICTOR CALVIN EWING (3),

Defendants.

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CRIMINAL NO.: **4:26-cr-677**

FILED UNDER SEAL

INDICTMENT

THE GRAND JURY CHARGES:

INTRODUCTION

At all times material to this Indictment:

1. The Fort Bend County Tax Assessor-Collector (“FBCTA-C”) office is a Fort Bend County government department located in the Southern District of Texas responsible for collecting property taxes, vehicle registrations, titles, and related fees, and acts as an agent for the State of Texas for motor vehicle services. The FBCTA-C maintains offices in the following cities throughout Fort Bend County: Richmond, Katy, Missouri City, Sugar Land, Needville, and Sienna, all located in the Southern District of Texas.

2. The Fort Bend County government’s annual budget is funded by multiple sources that includes individual and business taxpayers who reside and are located within Fort Bend County, federal funds and grants received from the U.S. government, and funds allocated by the State of Texas.

3. During each of the calendar years from 2023 through 2025, Fort Bend County was an organization and local government that received federal funding in excess of \$10,000 under federal programs involving grants and other forms of federal assistance.

4. The Defendant, Carmen Patrice TURNER (“TURNER”), was the Democratic Party Candidate who was elected to be the FBCTA-C on or about November 3, 2020. TURNER was sworn into office as the elected FBCTA-C on or about January 1, 2021. TURNER was reelected as the FBCTA-C on November 5, 2024. TURNER’s current term of office is through on or about December 31, 2028.

5. Defendant TURNER hired Co-Conspirator #1 on or about October 16, 2023, as a full-time FBCTA-C Deputy Tax Clerk to report directly to TURNER. Co-Conspirator #1 was terminated from the FBCTA-C office in or about September 2024.

6. Defendant TURNER hired Defendant Shemerrylyn Regina FIELDS (“FIELDS”) on or about March 4, 2024, as a full-time FBCTA-C Deputy Tax Clerk to report directly to TURNER. As of October 20, 2026, FIELDS is still employed by FBCTA-C.

7. TURNER ostensibly hired both Conspirator #1 and FIELDS as Deputy Tax Clerks, but in truth she hired them to care for TURNER’s then 81-year-old mother (“Mother”) who is wheelchair bound and living in an apartment in Houston, Texas. TURNER’S Mother is a recipient of Texas Simplified Application Process (“TSAP”), which provides Supplemental Nutrition Assistance Program (SNAP) food benefits to Texas households where all household members are either older adults (age 60 and older) or people with disabilities. TURNER’S Mother receives benefits from the Social Security Administration, specifically, from Retirement, Survivors, and Disability Insurance (RSDI), and she is also a Medicare Part B recipient.

8. Between October 2023 to March 2024, TURNER and Co-Conspirator #1, who previously was employed as a Medical Tech Supervisor and Group Home Coordinator/Manager, agreed that Co-Conspirator #1 would travel to TURNER'S Mother's apartment in Houston, Texas to care for TURNER'S Mother from 7:45 AM to 4:45 PM Monday through Friday, all while being paid as a FBCTA-C employee.

9. In or about December 2023, TURNER'S Mother was hospitalized for approximately one month. TURNER instructed Co-Conspirator #1 to stay with her Mother at the hospital during the day, and to continue to remotely report hours to the Fort Bend County government, even though TURNER knew Co-Conspirator #1 was not performing any actual work for the FBCTA-C office.

10. Defendant TURNER hired Defendant Victor Calvin EWING ("EWING") on or about October 16, 2023, as a as a full-time FBCTA-C employee with the title of "Department Coordinator" to report directly to TURNER. EWING is the father of TURNER's adult son. EWING resigned from his employment with the FBCTA-C office on or about March 6, 2024.

11. The "Department Coordinator" description for EWING's position included a pay rate of \$36.00/hr., and stated the following:

- Provide educational information and training pertain to the Tax Office and TxDMV laws, internal and external training of SIT portal.
- Manage special projects as needed to implement projects that enhance productivity and increase efficiency.
- Manage day-to-day interaction with DMV regarding computer systems and software Ensure state computer equipment stays in working order to provide efficient service to taxpayers.
- Seek out ways to increase revenue collections through the Tax Office (Scofflaw, Hotel Occupancy Tax, Coin Operations, CAD's) - Increase revenue collections for the county.

- Facilitate background checks and recordkeeping for Auto Department Title Service and Runner Program, Weekly; Track revenue generated through Title Service Program.
- Participates in activities and duties related to emergency management during a local state of disaster as directed by appropriate county managers.

12. At the same time EWING was supposed to be employed full-time with the FBCTA-C office in Fort Bend County, Texas, EWING was in truth a full-time employee of an airline company, Company “A”, working in Chicago, Illinois as a “Materials Specialist” at Chicago O’Hare International Airport. Through EWING’s work at Company “A”, EWING was issued a Security Identification Display Areas¹ (SIDA) badge. A SIDA badge is a security credential that identifies a person as authorized to access Security Identification Display Area spaces. These areas include secure perimeters, server rooms, data centers, and other critical infrastructure within federal facilities or contractor sites. The badge is issued after a formal background check and a security threat assessment, ensuring the holder has a legitimate need to access restricted spaces. It is worn visibly and must be renewed periodically to reflect current employment and clearance status.

13. EWING, as an FBCTA-C employee, had authorization to access WebDealer. WebDealer is a computer system maintained by the Texas Department of Motor Vehicles and utilized by car dealers and county tax offices including the FBCTA-C office. Car dealers enter documents and data into WebDealer when vehicles are sold and need to be registered. The FBCTA-C office accesses WebDealer to finalize and approve vehicle registrations by validating data and documents provided by the dealer. The registration for each vehicle is physically printed

¹ The SIDA is a portion of an airport, specified in the airport’s TSA-approved security program, in which certain security measures required by TSA are carried out. See 49 CFR 1540.5.

in the tax office. The process can be completed remotely up to the point of printing the vehicle registrations.

14. Fort Bend County employees can clock in and out of work daily by telephone. The call-in system is managed by a third-party company that tracks an employee's attendance and work hours. Additionally, there is software used by the Fort Bend County government to manage all employees' time sheets, work hours, schedules, and leave requests.

Relevant Financial Institutions

15. Fort Bend County government's payroll account is located at Cadence Bank, ending in xxx2686. Cadence Bank, now currently known as Huntington National Bank, was a financial institution with dual headquarters in Houston, Texas and Tupelo, Mississippi.

16. TURNER owned a Wells Fargo Business Account, "Carmen P. Turner DBA International Trucking II," ending in xxx6478. Wells Fargo is a financial institution based in San Francisco, California.

17. Co-Conspirator #1 owned a Chime Account with Bancorp Bank, ending in xxx4632. Bancorp Bank is a financial institution based in Wilmington, Delaware.

18. FIELDS owned an individual checking account at J.P. Morgan Chase Bank ending in xxx5109. J.P. Morgan Chase Bank is a financial institution based in New York, New York.

19. EWING owned an individual checking account at J.P. Morgan Chase Bank ending in xxx3122.

20. CashApp is a financial services platform owned by Block, Inc. To provide banking features, CashApp partners with several Federal Deposit Insurance Corporation ("FDIC") insured banks, including Sutton Bank that is based in Attica, Ohio.

COUNT ONE
(Conspiracy)

THE CONSPIRACY

21. The allegations in Paragraphs 1 through 20 of this Indictment are incorporated and re-alleged as if fully set forth herein.

22. From in or about September 2023 through in or about September 2025, in the Southern District of Texas, and elsewhere, the defendants,

**CARMEN PATRICE TURNER,
SHEMERRYLYN REGINA FIELDS,
and
VICTOR CALVIN EWING,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and others known and unknown to the Grand Jury to commit an offense against the United States, namely, as set forth in this Indictment, to:

- a. Being an agent of an organization and local government that receives, in any one-year period, benefits in excess of \$10,000 in federal assistance, did embezzle, steal, obtain by fraud, knowingly convert without authority, and intentionally misapply property that was valued at \$5,000 or more and is owned by and is under the care, custody, and control of, such organization and local government, in violation of Title 18, United States Code, Section 666(a)(1)(A);

and
- b. To devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing said scheme and artifice to defraud, transmit and causing to be transmitted by means of wire communications in interstate commerce, writings, signs signals, pictures, and sounds in violation of Title 18, United States Code Section 1343.

MANNER AND MEANS

23. The manner and means of the conspiracy include the allegations described in Paragraphs 1 through 20, which are hereby incorporated by reference. The defendants, along with

co-conspirators known and unknown to the Grand Jury, sought to accomplish the purpose of the conspiracy by the following manner and means, among other things:

- (a) Under the guise of hiring them as Deputy Tax Clerks to be paid by the FBCTA-C office, TURNER hired Conspirator #1 and FIELDS to care for TURNER's then 81-year-old mother while falsely representing to Fort Bend County that they were performing the duties of Deputy Tax Clerks;
- (b) TURNER instructed Co-Conspirator #1 and FIELDS to "clock in" for their jobs as Deputy Tax Clerks by calling the Fort Bend County remote call-in number, commonly referred to by Fort Bend County employees as "Time Clock," at approximately 7:45 a.m. and to clock out at approximately 5:00 p.m., every day between Monday through Friday, even though TURNER knew Co-Conspirator #1 and FIELDS were not performing any actual work for the FBCTA-C office.
- (c) TURNER approved the hiring of EWING for a full-time FBCTA-C position, knowing that EWING was already employed full-time at Company "A" and working full-time in Chicago, Illinois, and that EWING would not perform any bona fide work on behalf of the FBCTA-C office.
- (d) Co-Conspirator #1, FIELDS, and EWING provided false representations, concealment, and omissions that caused the Fort Bend County government to make deposits for payroll, benefits, and compensation into bank accounts held by Co-Conspirator #1, FIELDS, and EWING.
- (e) TURNER and EWING agreed that once EWING received payroll deposits from Fort Bend County government, EWING would transfer a portion of the money to TURNER.

- (f) TURNER instructed Co-Conspirator #1 and EWING that if anyone asked where Co-Conspirator #1 or EWING worked, Co-Conspirator #1 and EWING were to say “on the 2nd Floor at the Missouri City tax office location.”
- (g) TURNER enabled Co-Conspirator #1, FIELDS, and EWING to maintain FBCTA-C computer system access to give them the appearance of legitimate employment and to prevent discovery of their lack of actual work for FBCTA-C.

ACTS IN FURTHERANCE OF THE CONSPIRACY

24. In furtherance of the conspiracy and to achieve the objects of the conspiracy, at least one of the co-conspirators committed or caused to be committed in the Southern District of Texas and elsewhere, at least one of the following acts in furtherance of the conspiracy, among others:

- (a) On or about October 3, 2023, EWING submitted an online, “Employment Application” to the Fort Bend County government with a falsified “Resume” that states that EWING only worked “weekends” as a Materials Specialist for Company “A” in Flushing, New York when in fact EWING was working full-time as a Materials Specialist for Company “A” in Chicago, Illinois.
- (b) On or about October 13, 2023, TURNER signed and approved a “Fort Bend County Employee Action Form” for Co-Conspirator #1, for a “Full Time Deputy Tax Clerk, base pay rate of \$18.49/hour.”
- (c) On or about October 13, 2023, TURNER signed and approved a “Fort Bend County Employee Action Form” for EWING, for a “Full Time, Department Coordinator, Base Pay Rate \$36.00/hour,” for submission to Fort Bend County Human Resources Department, knowing full well that neither Co-Conspirator

#1 nor EWING was going to perform the job duties as described, and that Fort Bend County government funds would be misapplied.

- (d) On or about October 17, 2023, Co-Conspirator #1 began providing home health care for TURNER'S Mother at TURNER'S Mother's apartment located in Houston, Texas.
- (e) On or about October 23, 2023, TURNER, directed her Administrative Assistant to send an email on TURNER's behalf to the *Fort Bend County Card Access Systems Department* regarding EWING, and two other FBCTA-C office employees that stated "Staff access to Missouri City 2nd Floor of 10/23/2023 is only permitted to Victor Ewing...and.... per the request of the Honorable Carmen P. Turner, Fort Bend County Tax Assessor-Collector. Effective immediately, 10/23/2026. Please confirm once request has been updated."
- (f) On or about October 25, 2023, Co-Conspirator #1 sent a text message to TURNER stating, "Last week time is Monday thru Thursday 7:45am to 4:45 pm with hour lunch break" and "This week will be Wednesday thru Friday 7:45 to 4:45."
- (g) On or about October 25, 2023, around 2:04 p.m., Co-Conspirator #1 sent a text message to TURNER stating, "So let me ask u this!! Until home health kick in, can u n ur sisters pay me 300\$ a week for Monday thru Thursday night? I will do 4 nights a week and of course here during the day."
- (h) On or about November 16, 2023, around 9:41 a.m. CST Co-Conspirator #1 sent a photo (via text message) to TURNER of TURNER'S Mother sitting in her wheelchair at the apartment in Houston.

- (i) The certified timesheet submitted to Fort Bend County government for Co-Conspirator #1 showed that on or about November 16, 2023, Co-Conspirator #1 worked from 7:47a.m. to 1:06 p.m. and 2:09 p.m. to 4:45 p.m. and that Co-Conspirator #1 reported hours by calling in by telephone.
- (j) On or about November 30, 2023, Co-Conspirator #1's Chime Account with Bancorp Bank, located in Wilmington, DE, received a direct deposit in the amount of \$1266.44 from the Fort Bend County government payroll account, located at Cadence Bank, by way of an Automated Clearing House ("ACH") payment.
- (k) On or about December 1, 2023, EWING received a Fort Bend County government payroll payment from Cadence Bank as a direct deposit, in the amount of \$2,289.15 into EWING's J.P. Chase Morgan personal account.
- (l) On or about December 4, 2023, EWING made an ATM withdrawal of \$840 in Houston, Texas from EWING's J.P. Chase Morgan personal account.
- (m) On or about December 4, 2023, TURNER deposited \$600 via ATM in Richmond, Texas into her Wells Fargo Business Account, "Carmen P. Turner DBA International Trucking II."
- (n) On or about January 12, 2024, TURNER logged into WebDealer using EWING's login credentials. In one of those "transactions," TURNER erroneously approved a vehicle cost of \$295,836.92, instead of \$29,583.92, which caused the car dealership a significant error in the assessed sales tax, which is automatically withdrawn from the dealership's bank account. When questioned by an Investigator from the Texas Department of Motor Vehicles

(“TxDMV”), TURNER admitted that she processed 41 transactions, logged in as “EWING” on this day to “help the office with the increase workload,” since she, herself, did not have official access to the system.

(o) On or about January 12, 2024, EWING’S SIDA badge shows EWING was physically present and working at Chicago O’Hare International Airport from 8:30 a.m. to 6:30 p.m. for Company “A.” While working at Chicago O’Hare International Airport for Company “A,” both of EWING’S personal and Fort Bend County cell phones show he remotely called in the following “work” hours for Fort Bend Tax Office from Chicago, IL.

- i. 7:42 AM call into (281) XXX-3678 from (346) XXX-8163 (county-issued phone in Chicago);
- ii. 11:55 AM call into (281) XXX-3678 from (346) XXX-8163 (county-issued phone in Chicago);
- iii. 12:55 PM call into (281) XXX-3678 from (346) XXX-8163 (county-issued phone in Chicago); and
- iv. 5:17 PM call into (281) XXX-3678 from (346) XXX-8163 (county-issued phone in Chicago)

(p) On or about February 9, 2024, EWING’S J.P. Chase Morgan personal account, located in New York, NY, received from the Fort Bend County government payroll account at Cadence Bank, a direct deposit in the amount of \$2,092.80 by way of an ACH payment.

(q) On or about February 10, 2024, EWING sent \$800 to TURNER by way of CashApp.

- (r) On or about May 29, 2024, around 4:02 p.m. CST, FIELDS sent (via text message) a photo to TURNER of TURNER'S Mother being assisted in her wheelchair at TURNER'S Mother's apartment in Houston, TX.
 - (s) The certified timesheet submitted to Fort Bend County government for FIELDS showed that on May 29, 2024, FIELDS worked from 7:39 a.m. to 12:00 p.m. and 1:01 p.m. to 5:00 p.m. and that FIELDS reported her hours remotely by calling in by telephone.
 - (t) On or about June 5, 2024, FIELDS sent a text message to an Occupational Therapist named "Peter" that stated, " Good afternoon Peter this is Shemerrylyn Fields I am the care giver for [TURNER'S Mother]. I just wanted to know what time you supposed to be coming today."
 - (u) On or about June 12, 2024, FIELDS' J.P. Morgan Chase Bank, located in New York, NY, received a direct deposit in the amount of \$1290.32 from the Fort Bend County payroll account, located at Cadence Bank, via an ACH payment.
- All in violation of Title 18, United States Code, Sections 371 and 2.

COUNT TWO
(Theft Concerning Programs Receiving Federal Funds)

25. The Grand Jury adopts, realleges, and incorporates Paragraphs 1 through 24 of the Indictment as if fully set forth herein.

26. From in or around October 2023 to on or about December 31, 2023, in the Southern District of Texas and elsewhere, the Defendants,

CARMEN PATRICE TURNER
and
VICTOR CALVIN EWING,

being agents of the Fort Bend County government and the FBCTA-C office, an organization and local government that received in any one-year period, benefits in excess of \$10,000 in federal assistance, did embezzle, steal, obtain by fraud, knowingly convert without authority, and intentionally misapply property that is valued at \$5,000 or more and is owned by and is under the care, custody, and control of, such organization and local government, that is money and property that came into defendant's possession in the form of salary and benefits, which the defendant had not legitimately earned, by allegedly providing employment services to the Fort Bend County government.

In violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

COUNT THREE
(Theft Concerning Programs Receiving Federal Funds)

27. The Grand Jury adopts, realleges, and incorporates Paragraphs 1 through 24 of the Indictment as if fully set forth herein.

28. From on or about January 1, 2024, to on or about December 31, 2024, in the Southern District of Texas and elsewhere, the Defendants,

**CARMEN PATRICE TURNER,
SHEMERRYLYN REGINA FIELDS,
and
VICTOR CALVIN EWING,**

being agents of the Fort Bend County government and the FBCTA-C office, an organization and local government that received in any one-year period, benefits in excess of \$10,000 in federal assistance, did embezzle, steal, obtain by fraud, knowingly convert without authority, and intentionally misapply property that is valued at \$5,000 or more and is owned by and is under the care, custody, and control of, such organization and local government, that is money and property that came into defendant's possession in the form of salary and benefits, which the defendant had

not legitimately earned, by allegedly providing employment services to the Fort Bend County government.

In violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

COUNTS FOUR THROUGH SIX
(Wire Fraud 18 U.S.C. 1343 and 2)

29. The Grand Jury adopts, realleges, and incorporates Paragraphs 1 through 24 of the Indictment as if fully set forth herein.

30. In or about February 2024 through in or about September 2025, both dates being approximate and inclusive, within the Southern District of Texas and elsewhere, the defendants,

CARMEN PATRICE TURNER
and
SHEMERRYLYN REGINA FIELDS,

each aiding and abetting the other, knowingly devised and intended to devise a scheme and artifice to defraud Fort Bend County government, and to obtain money by means of materially false and fraudulent pretenses, representations and promises, knowingly transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, and signals, namely electronic funds transfers from Fort Bend County government payroll accounts, reflecting payments for work hours fraudulently entered in the Fort Bend County government's payroll system, which were processed through servers located outside of Texas, each such transfer constituting a separate count:

<u>Count</u>	<u>Date of Wire (on or about)</u>	<u>Wire Communication</u>
4	April 17, 2024	ACH transfer of \$1,304.98 from an account in the name of Fort Bend County ending in x2686 that traveled in interstate commerce and was deposited into account ending in x5109.
5	May 1, 2024	ACH transfer of \$1,279.14 from an account in the name of Fort Bend County ending in x2686 that

		traveled in interstate commerce and was deposited into account ending in x5109.
6	June 12, 2024	ACH transfer of \$1,290.32 from an account in the name of Fort Bend County ending in x2686 that traveled in interstate commerce and was deposited into account ending in x5109.

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS SEVEN THROUGH NINE
(Wire Fraud 18 U.S.C. 1343 and 2)

31. The allegations in Paragraphs 1 through 24 of this Indictment are incorporated and re-alleged as if fully set forth herein.

32. In or about September 2023 through in or about September 2025, both dates being approximate and inclusive, within the Southern District of Texas and elsewhere, the defendants,

CARMEN PATRICE TURNER
and
VICTOR CALVIN EWING,

each aiding and abetting the other, for the purpose of executing and attempting to execute the above-described scheme and artifice to defraud, knowingly transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, and signals, namely electronic funds transfers from the Fort Bend County government payroll accounts at reflecting payments for work hours fraudulently entered into the Fort Bend County government's payroll system, which were processed through servers located outside of Texas, each such transfer constituting a separate count:

<u>Count</u>	<u>Date of Wire (on or about)</u>	<u>Wire Communication</u>
7	December 1, 2023	ACH transfer of \$2,289.15 from an account in the name of Fort Bend County ending in x2682 that traveled in interstate commerce and was deposited into account ending in x3122.
8	January 26, 2024	ACH transfer of \$2,104.49 from an account in the name of Fort Bend County ending in x2686 that traveled in interstate commerce and was deposited into account ending in x3122.
9	February 23, 2024	ACH transfer of \$2,098.64 from an account in the name of Fort Bend County ending in x2686 that traveled in interstate commerce and was deposited into account ending in x3122.

All in violation of Title 18, United States Code, Sections 1343 and 2.

NOTICE OF CRIMINAL FORFEITURE
[18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c)]

33. The allegations contained in Paragraphs 1 through 32 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

34. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the United States gives notice to the defendants,

**CARMEN PATRICE TURNER,
SHEMERRYLYN REGINA FIELDS,
and
VICTOR CALVIN EWING,**

that in the event of their conviction of an offense in violation of Title 18, United States Code, Section 371, Section 666(a)(1)(A), or Section 1343, the United States intends to seek forfeiture of all property, real or personal, constituting or derived from proceeds obtained as the result of such violation.

MONEY JUDGMENT AND SUBSTITUTE ASSETS

35. The United States gives notice that it will seek a money judgment against each defendant. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exist, the United States will seek to forfeit any other property of each defendant up to the amount of the money judgment against that defendant.

A TRUE BILL:

Original signature on file

FOREPERSON OF THE GRAND JURY

AARON F. REITZ
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF TEXAS



CAROLYN FERKO
Assistant United States Attorney



RODOLFO RAMIREZ
Assistant United States Attorney