

INDICTMENT

CAUSE NO. 50951-B

THE STATE OF TEXAS vs. CHARLIE BURNS, JR.

DOB: 06/09/1936

OFFENSE: COUNT ONE - ENGAGING IN ORGANIZED ELECTION FRAUD (F3)
COUNT TWO - FRAUDULENT USE OF APPLICATION FOR BALLOT BY MAIL (SJF)
COUNTS THREE - SEVEN - POSSESSION OF A BALLOT OR CARRIER ENVELOPE ENHANCED (SJF)
COUNT EIGHT - TAMPERING WITH A GOVERNMENTAL RECORD WITH INTENT TO HARM OR DEFRAUD (SJF)

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

THE GRAND JURORS, duly selected, empaneled, sworn, charged, and organized as such for the County of Gregg, State of Texas, at the July-December, 2020 term of the 188th District Court for said County, upon their oaths present in and to said Court that from on or about the 22nd day of January A.D., 2018 and continuing until on or about the 6th day of March A.D., 2018, and anterior to the presentment of this Indictment, in the County and State aforesaid, CHARLIE BURNS, JR., hereinafter called Defendant, did then and there

COUNT ONE

Engaging in Organized Election Fraud (F3)

with the intent to establish, maintain, and participate in a vote harvesting organization, said organization consisting of Shannon Brown, Marlena Jackson, Dewayne Ward, and Charlie Burns, who collaborated in carrying on election offenses under Titles 1 through 7 of the Texas Election Code, knowingly commit the offenses of fraudulent use of a mail ballot application and possessing a ballot or carrier envelope of another multiple times in the same election, by acting with the intent to promote or assist the commission of said offense by soliciting, encouraging, directing, aiding, or attempting to aid members of said organization to commit said offense,

COUNT TWO

Fraudulent Use of Application for Ballot by Mail (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Davonia Bradley, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT THREE

Possession of a Ballot or Carrier Envelope Enhanced (SJF)

And further that Defendant, on or about the 16th of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Otis Jones,

COUNT FOUR

Possession of a Ballot or Carrier Envelope Enhanced (SJF)

And further that Defendant, on or about the 17th of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Natasha Bush,

COUNT FIVE

Possession of a Ballot or Carrier Envelope Enhanced (SJF)

And further that Defendant, on or about the 17th of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Davonia Bradley,

COUNT SIX

Possession of a Ballot or Carrier Envelope Enhanced (SJF)

And further that Defendant, on or about the 17th of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Veronica Moore,

COUNT SEVEN

Possession of a Ballot or Carrier Envelope Enhanced (SJF)

And further that Defendant, on or about the 22nd day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Roceta Anderson,

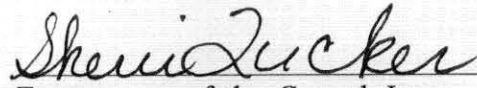
And it is further alleged that Defendant committed the offenses described in Counts Three through Seven in the March 6, 2018 Democratic primary election,

COUNT EIGHT

Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)

And further that Defendant, on or about the 22nd day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams an application for ballot by mail for voter Davonia Bradley, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

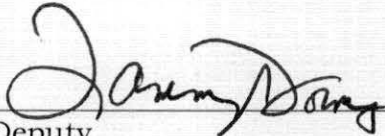
AGAINST THE PEACE AND DIGNITY OF THE STATE.


Foreperson of the Grand Jury

THE STATE OF TEXAS
COUNTY OF GREGG

I, Trey Hattaway, Clerk of the District Court within and for the County and State aforesaid, do hereby certify that the foregoing contains a true and correct copy of the Indictment in Cause No. 50951-B, of the State of Texas vs. CHARLIE BURNS, JR. as now on file in this office.

IN TESTIMONY WHEREOF I hereto set my hand and seal, this 23rd day of Sept., A.D. 2020.

By 
Deputy

Trey Hattaway
Clerk of the District Court
Gregg County, Texas

WITNESSES

