Texas Secretary of State

P.O. Box 12060

Austin, Texas 78711-2060

1-800-252-VOTE (8683)

www.sos.state.tx.us

## 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.

Texas Election Code 276.015(b)

In exchange for compensation or other benefit, Respondent knowingly provided "vote harvesting services" by interacting with one or more voters, in the physical presence of ballots voted by mail, intended to deliver votes for a specific candidate.

Texas Election Code 276.015(d)

Respondent knowingly collected and possessed a mail ballot and official carrier envelope in connection with vote harvesting services.

ATTACHADDITIONAL PAGES AS NEEDED

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## IV. STATEMENT OF FACTS

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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 November 8,	2022 General Election	DATE OF ELE MM/DD/YYYY	CTION	1_	1	/	0	8	/ :	2 ′	2
COUNTY OR POLITICAL SUBDIVISION	Starr County	_ PRECINCT .	n/a								_

On or about October 20, 2022, in Roma, Texas, Respondent approached the house of Eusebio Aleman, entered the house, assisted at least one resident with completing their mail ballots, and left the residence in possession of at least one mail ballot and official carrier envelope.

Respondent has indicated to Debbie Garza and Maria Yvette Hernandez that she works for Eloy Vera, candidate for Starr County Judge. However, Vera has failed to file his pre-election campaign finance report required by Election Code 254.064, essentially hiding the relationship between the two.

ATTACH ADDITIONAL PAGES AS NEEDED

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## 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.

Video recording of interview with couple whose ballots were harvested by Respondent.

Video recording of conversation between Debbie Garza and Respondent.

ATTACHADDITIONAL PAGES AS NEEDED