

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION

Cause No: 49

STATE OF INDIANA )  
 )  
 vs. )  
 )  
Indiana Voter Registration Project

**INFORMATION**  
**COUNT I**  
**PROCURING OR SUBMISSION OF**  
**FALSE, FICTITIOUS, OR FRAUDULENT**  
**VOTER REGISTRATION APPLICATION**  
**I.C. 3-14-3-1.1(1)**  
**A LEVEL 6 FELONY**  
**COUNT II**  
**COUNTERFEITING**  
**I.C. 35-43-5-2(a)(1)(D)**  
**A LEVEL 6 FELONY**

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

On or about between May 1, 2016 and November 8, 2016, Indiana Voter Registration Project did knowingly procure or submit voter registration applications known by Indiana Voter Registration Project to be materially false, fictitious or fraudulent;

COUNT II

On or about between May 1, 2016 and November 8, 2016, Indiana Voter Registration Project, did knowingly make or utter a written instrument, to-wit: one or more voter registration applications; in such a manner that it/they purports/purported to have been made by by another person and/or by authority of one who did not give authority;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44.1-2-1 that the foregoing representations are true.

/s/ Jeremy Teipen  
Affiant

June 9, 2017  
Date

**TERRY R. CURRY**  
Marion County Prosecutor

State's Witnesses:

Jeffrey C. Hearon 5201 ISP  
Harris Smith 6074 ISP  
Matt Lawrence 6464 ISP  
Jerry Gentry 6168 ISP  
William Vann 5220 ISP  
Leonard Langland 6352 ISP  
Amy S. Gaul 5934 ISP  
Jeremy C. Franklin 7554 ISP  
Scott R. Jarvis 6784 ISP  
David R. Preston 6065 ISP  
Randy Pratt 5536 ISP  
Cindy Mowery  
Ladonna Freeman  
Debra Gazvoda  
Mary Prewitt  
Michelle Cash  
Pamela McCreary  
Mellissa Terry  
Jyrrell Gray

19th Judicial Circuit

/s/ Jeremy Teipen  
Deputy Prosecuting Attorney

## AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Lieutenant Jeffrey C. Hearon swears (affirms) that:

Information set forth below in this Probable Cause Affidavit is either personally known to Affiant, information obtained from other law enforcement sources, information obtained from public records and/or information from sources otherwise identified in this Affidavit. The facts developed from this investigation are as follows and are not inclusive of all information gathered and/or developed as a result of this ongoing investigation:

On or about August 23, 2016, the Hendricks County Clerk, Ms. Debbie Hoskins, contacted me and reported that during June, July, and August of 2016, a significant number of voter registration applications were received by her office from the Marion County Board of Voters Registration Office. The voter registration applications were submitted to their office by a voter registration drive organization called "The Indiana Voter Registration Project", hereafter referred to as IVRP. Upon reviewing and vetting the applications, the Hendricks County Clerk's Office noted many inconsistencies with the submitted applications and were concerned that some may be forged or fraudulent. Furthermore, Ms. Hoskins advised me that many of the applicants were already registered to vote, so the on-file registrations were compared to the newly submitted applications. The newly submitted applications had the following characteristics: very sloppy penmanship, missing information, and/or contained erroneous data, such as, but not limited to the following: Applicants' printed name not matching applicants' signature, missing applicants' telephone number, and applicant address not matching applicants' County of residence.

After learning this information, I scheduled a meeting with Indiana Secretary of State Connie Lawson to discuss these concerns and inquire about the Indiana Voter Registration Project (IVRP), and if they were a registered entity. Secretary Lawson and her staff were unaware of this

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Lieutenant Jeffrey C. Hearon

organization and had not received any complaints. Further investigation revealed no evidence that IVRP ever properly registered with the Secretary of State.

During the subsequent Indiana State Police investigation on September 2, 2016, I spoke with Ms. Cindy Mowery and Ms. Ladonna Freeman, Co-Directors of the Marion County Board of Voters Registration. They reported that their office had received thousands of voter registration applications from "The Indiana Voter Registration Project". According to Ms. Mowery and Ms. Freeman, several of the voter registration applications were incomplete, and when compared to on-file voter registrations for the same applicants, their signatures did not match. This is consistent with the original findings by the Hendricks County Clerk's Office.

On September 6, 2016, Indiana State Police detectives went to the Marion County Board of Voters Registration to conduct follow up interviews with the directors. Detectives learned that the IVRP had submitted (27,377) voter applications. These applications were submitted by Holiday Burke and another unknown male named Karim (employees of the IVRP). Director Cindy Mowery became suspicious of the group and sent an attorney to the IVRP office headquarters located at 2425 N. Meridian Street, Indianapolis, IN. After observing the location, the attorney expressed concerns about the legitimacy of the organization and conveyed those concerns to Director Mowery. While detectives were speaking with the directors, personnel informed the detectives that Holiday Burke was currently dropping off voter registration applications. F/Sgt. William Vann and I conducted an investigative interview with Burke at the clerk's office. The following information was learned through the interview: Burke conveyed that she was a community organizer with the Indiana Voter Registration Project (IVRP), a non-partisan voter registration drive. Burke stated that she receives her paychecks from a company identified as "Block by Block". Burke stated that the group targeted areas that were historically under represented or disenfranchised, in order to encourage people to register to vote. This was I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

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achieved by hiring part time employees to target the identified areas and attempt to register people to vote. These employees would be paid \$50.00 per five hour shift. That same day, detectives traveled to the IVRP office located at 2425 N. Meridian Street, Indianapolis, IN. Upon arrival, detectives observed that the business did not have any signs on the door to signify an office for the IVRP. A sign placed on the door instructed patrons to enter through the rear alley door. Detectives proceeded to the rear entry and upon entering, noted minimal furnishings, which consisted of folding tables and chairs.

Detectives met with the IVRP supervisor Ryan Garner. Garner provided additional details of IVRP. Garner stated that the IVRP maintains offices in both Indianapolis and Gary, IN. Detectives later confirmed that the alleged office location in Gary was actually a vacant lot. Garner stated that the IVRP worked for an organization called "Rebuild USA", as well as a group of Washington DC based attorneys. Garner declined to provide additional details, such as, who his supervisors were, if they were a registered political action committee or a not-for-profit organization registered with the State of Indiana. When detectives questioned Garner about the concerns of the registration applications, Garner responded by saying that the IVRP attempts to verify the accuracy of the information, but the IVRP is limited on the ability to fully vet them due to the deadline for submission.

Upon reviewing several suspected voter registration applications from the IVRP and determining several contained missing, erroneous or fraudulent information, detectives met with personnel from the Indiana Secretary of State's Office to relay the concerns. As a result, Secretary Connie Lawson distributed a public service announcement for the general public to verify their voter registration records, as well as a second letter directing all Clerk's offices in the State of Indiana to carefully review applications received by the IVRP. As detectives began to conduct follow up

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/s/ Jeffrey C. Hearon

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investigation into the questionable voter registration applications, detectives learned the following information:

\*Employees of IVRP were pressured to obtain (10) applications (quota) per shift, or risk termination.

\*Employees of IVRP were advised by IVRP supervisors to obtain their quota by any means necessary.

\*Employees of IVRP would duplicate information from actual voter registration files onto new applications to meet their quota.

\*Employees of IVRP would commonly not sign the applications and provide those applications to other employees who may not have obtained their quota of applications during their shifts.

Furthermore, on October 3, 2016, I applied for a search warrant for the offices of the IVRP. On October 4, 2016, detectives with the Indiana State Police executed a search warrant on the IVRP offices. When detectives entered the offices of IVRP located at 2425 North Meridian Street Indianapolis, IN, the following employees were present: Andrew Young, Jason Vincent, Karim Aziz, Stephanie Gore, Betina Lewis, Allison Daniels (Allison Baker), Holiday Burke and Lonnie Wooden. The employees' computers were being utilized to conduct the IVRP business, so pursuant to the search warrant, the computers were seized and the employees were allowed to leave the building. Holiday Burke requested to remain as a representative for the IVRP and to view the execution of the search warrant. Ms. Burke was allowed to remain, but was chaperoned to prevent any alteration of the evidence.

During the course of the search warrant and subsequent review of the seized information, detectives located evidence indicative of payroll information. The payroll information listed Block By Block, INC., Voucher 2015, P.O. Box 12182, Washington, DC, 20006. Further I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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investigation indicated that the address listed on payroll checks is ultimately associated to Field Strategies and Ardleigh Group, LLC, located at 1725 I Street N. W., STE. 900, Washington, DC, 20006.

During the course of the search warrant and subsequent review of the seized information, detectives located evidence of (34,000) voter registration applications encompassing (56) Indiana Counties. Furthermore, many of the submitted applications had notations on them which included one or more of the following: applications were for juveniles, not United States citizens, people who lived out of state, had incorrect telephone numbers, incorrect zip codes, invalid or non-existent addresses, that real voters denied making application when contacted and for multiple registrations. Additionally, detectives examined multiple voter registration applications that had been completed months before but had not been submitted. Among the dated voter registration applications, there were (16) turned in by Tina Pace, (7) by Kiziah Tyler and (1) by Dominique Squires. I directed that all the late, un-submitted applications be photographed. I then informed Holiday Burke, Verification Director for the IVRP, it was in violation of IC 3-7-32-8 to hold any application in excess of 10 days. As I indicated above, several of the applications appeared to be fictitious. I picked up and reviewed a packet of sixteen applications that had been certified and turned in by Tina Pace. I questioned Holiday Burke as to why there were so many applications from Tina Pace that had not been submitted. She stated "because she had problems with her registrations". I asked her what she meant and if that meant they were fictitious. Ms. Burke confirmed that they were in fact fictitious. Ms. Burke made a general statement as well, that the reason the late applications had not been submitted is because they were either incomplete or fictitious. I then advised her that an affidavit would need to be submitted and tendered to the respective Clerk's office for each application that was suspected of being fraudulent or forged.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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I assigned Detective Randy Pratt to conduct a follow up investigation on the applications turned in by Tina Pace and by Kiziah Tyler. Detective Pratt contacted Kiziah Tyler who confessed to forging all of the applications except one. Detective Pratt then contacted Tina Pace who admitted to forging multiple applications, but could not identify which were forged and which were legitimate.

The application I examined, certified by Dominique Squires, was for Cesar Cepeda. The application for Mr. Cepeda was incomplete, only listing his first name, last name, telephone number, confirmed that he was a United States Citizen, over the age of 18, contained his alleged signature, but was missing his DOB and address.

On or about October 11, 2016, Holiday Burke submitted numerous voter registration applications which included the applications certified by Dominique Squires, Kiziah Tyler and Tina Pace to the Marion County Board of Voters Registration. I was made aware of the fact that applications had been dropped off by Marion County Voter Registration Co-Director Cindy Mowery and I requested a copy of each of those applications. Ms. Mowery advised that Holiday Burke had not submitted an affidavit indicating that any of the voter registration applications were materially false. I examined a copy of the application Ms. Burke dropped off for Cesar Cepeda and realized that it had been altered by a DOB and an address being added. On November 3, 2016, Mr. Cepeda was interviewed and he stated that he had been approached in a Meijer parking lot by a black female inquiring about him registering to vote. Cepeda stated that he advised her that he could not vote because he was not a US citizen. The female then asked him for his name and phone number, which he had verbally provided to her. Cepeda advised that he had not filled out nor signed a voter registration application. Cepeda was then shown a copy of the application in which he denied completing and he advised that it was not even his handwriting.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

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**Affidavit for Probable Cause**

**From:** Lieutenant Jeffrey C. Hearon

On October 14, 2016, a search warrant was obtained to search the data contained in the computers from the IVRP offices that were seized on October 4, 2016. A review of email correspondences from Holiday Burke, Karim Aziz, Andrew Young, Stephanie Gore, Betina Lewis, and Allison Daniels indicated that the Indiana Voter Registration Project (IVRP) appears to be a subsidiary of "Block by Block". Furthermore, Block by Block appears to be a subsidiary of "Field Strategies", which ultimately appears to be a subsidiary of "Ardleigh Group LLC", based in Washington, DC.

A review of email correspondence and spread sheets from data contained in the computers indicate the principal employees of the IVRP, located at 2425 N. Meridian Street, Indianapolis, IN, are Holiday (Holly) Burke, Karim Aziz, Benita Lewis, Andrew Young, Ryan Garner, and Allison Baker.

The following indicates the structure and principle functions of each IVRP employee:

Holiday (Holly) Burke- IVRP/Field Strategies, Project Organizer, Verification Director, run daily operations to include hiring/firing decisions, review and turn in voter registration forms to the Marion County and St. Joseph County Voter Registration Offices.

Karim Aziz- IVRP/Field Strategies Project Organizer, rent office space for 2425 North Meridian Street, Indianapolis, IN location (reimbursed by Block by Block and the Ardleigh Group, LLC, as per his bank records). Run daily operations to include hiring/firing decisions, review and turn in voter registration forms to the Marion County Board of Voters Registration.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

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**From:** Lieutenant Jeffrey C. Hearon

Ryan Garner- Vice President at Field Strategies, assist in daily operations of the IVRP, review voter applications.

Benita Lewis- IVRP/Field Strategies, assist in daily operations of the IVRP, review voter applications.

Andrew Young- IVRP/Field Strategies, assist in daily operations of the IVRP, voter registration organizer, coordinator of job description and policy information. Listed as an author within Indiana pay tracker spread sheets.

Allison Baker (Allison Daniels) - IVRP/Field Strategies, Verification Director, review voter registrations.

A review of the emails, spreadsheets and other documents located from the computers, indicate that the IVRP Officials had flagged numerous registrations received from their canvassers, knowing that they contained false information. They proceeded to submit the flagged registrations to the various County voter registration offices which is in violation of IC 3-14-3-1.1.

Internal correspondence indicated the following which demonstrates that members of the IVRP knew their employees were submitting voter registration applications with fictitious information:

08/29/2016- 03:54:07

From: Holiday Burke (XXXXXXXXXX). Email titled "Ebony bond Terrence tolls Lydia Garrett Regols Anderson". Burke noted the following:

*"Ebony bond Terrence tolls Lydia Garrett Regols Anderson*

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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*1200 dups not dups*

*Over 1000 bad info*

*681 listed bad info.*

*Pending is 7 day hold*

*All in active*

*Rejected bad info*

*date-last-viewed 0 date-received 1472486047 flags 8590195713 remote-id 14064"*

08/30/2016- 10:56:45

From: Holiday Burke (XXXXXXXXXX), To: Karim Aziz (XXXXXXXXXX). Email titled "Flagged Canvassers (holly being soft, we can be harder)". The following was stated in the email:

*"We have copied problematic registrations that will be followed up with one on one conversations tomorrow if they've already been scheduled. One warning rule for something strange.*

*For 2nd questionable registration, serious BS registration, or not 40% verifiable = automatic unscheduling.*

25th

*No such address from:*

*Joseph William*

*Lydia Garrett*

*Lydia Garett -address to payne funeral home*

*Anthony Washington*

*Brittany Holloway*

*Lamar Welch*

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017\_\_\_\_\_

**Affidavit for Probable Cause**

**From:** Lieutenant Jeffrey C. Hearon

*Lamar Welch- McDonalds address*

*Chavez Miller*

*Lamont Bailey (not be scheduled)*

26th

*Reinold Anderson*

*Lamar Welch*

*Anthony Washington*

*Tonya Trotter*

*Tonya Trotter*

*Tonya Trotter*

*Ryland Mason (address to old business)*

*Ryland Mason*

*Dallila Anderson*

*Ebony Bond*

27th

*Claude Nash*

*Tonya Trotter (fairgrounds)*

*Nakeyan Johnson*

*Tonya Trotter*

*Misty McClair*

Verification Call Red Flag

*Chavez Miller-- no one here by that name"*

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017\_\_\_\_\_

**Affidavit for Probable Cause**

**From:** Lieutenant Jeffrey C. Hearon

08/30/2016- 11:13:47

From: Holiday Burke (XXXXXXXXXX), To: Karim Aziz (XXXXXXXXXX),  
cc: Betina Lewis (XXXXXXXXXX), M Osman (XXXXXXXXXX), Andrew Young  
(XXXXXXXXXX), and Allison Baker (XXXXXXXXXX). Email titled "Flagged Canvassers".

The following was stated in the email:

*"We have copied problematic registrations that will be followed up with one on one conversations tomorrow if they've already been scheduled. One warning rule for something strange by Andrew and Allison.*

*For 2nd offense, serious BS registration, or we were unable to verify 40% of a packet = automatically not scheduled.*

*We will begin implementing a 3 round call system to give canvassers a chance to have packets verified.*

*This is the list of people receiving final warning because they registered someone at an address that does not exist or is a business.*

25th

*Joseph William*

*Lydia Garrett*

*Lydia Garrett -address to payne funeral home*

*Anthony Washington*

*Brittany Holloway*

*Lamar Welch*

*Lamar Welch- McDonalds address*

*Chavez Miller*

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017\_\_\_\_\_

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**From:** Lieutenant Jeffrey C. Hearon

*Lamont Bailey (not be scheduled)*

26th

*Reinold Anderson*

*Lamar Welch*

*Anthony Washington*

*Tonya Trotter*

*Tonya Trotter*

*Tonya Trotter*

*Ryland Mason (address to old business)*

*Ryland Mason*

*Dallila Anderson*

*Ebony Bond*

27th

*Claude Nash*

*Tonya Trotter (fairgrounds)*

*Nakeyan Johnson*

*Tonya Trotter*

*Misty McClair*

Verification Call Red Flag

*Chavez Miller-- no one here by that name "*

09/11/2016- 12:18:19

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017\_\_\_\_\_

**Affidavit for Probable Cause**

**From:** Lieutenant Jeffrey C. Hearon

From: Allison Baker (XXXXXXXXXX), To: Karim Aziz (XXXXXXXXXX), Betina Lewis (XXXXXXXXXX), Holiday Burke (XXXXXXXXXX). Email titled "Flagged Canvassers". The following was stated in the email:

**"Red Flags"**

*Ebony Randle- IND-2606 -Nathan King "Not at this number"*

*Joseph Williams- IND-2635- Frances Salazar- address belongs to office building, →Verification call- number to a painting company*

*Miya Hendon- LaRanda Wells- no such address*

*Craig Cartwright- Stacy Williams- address to metropolitan Baptist center"*

09/11/2016- 2:40:37

From: Holiday Burke (XXXXXXXXXXXXXXXXXXXXXXXXX), To: Allison Baker (XXXXXXXXXXXXXXXXXXXXXXXXX), cc: Karim Aziz (XXXXXXXXXXXXXXXXXXXXXXXXX), Betina Lewis (XXXXXXXXXX). Email titled "Re: Flagged Canvassers". The following was stated in the email:

*"What I'm seeing is a huge improvement on the amount of NSA's or "no such addresses" being flagged. That means our briefings are more strategic and the trainings are more effective. Allison-- continue to give the results of a verification call following a confusing audit as you did in scenario one. Moving forward lets get date ranges on flagged or "purge" lists so we always have a time stamped idea of what's going on.*

*Sent from my iPhone*

*On Sep 10, 2016, at 8:18 PM, Allison Baker <XXXXXXXXXX > wrote:*

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

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**Red Flags**

*Ebony Randle- IND-2606 -Nathan King "Not at this number"*

*Joseph Williams- IND-2635- Frances Salazar- address belongs to office building, →Verification call- number to a painting company*

*Miya Hendon- LaRanda Wells- no such address*

*Craig Cartwright- Stacy Williams- address to metropolitan Baptist center"*

09/11/2016- 8:47:11

From: Allison Baker (XXXXXXXXXX), To: Karim Aziz (XXXXXXXXXX), Betina Lewis (XXXXXXXXXX), Holiday Burke (XXXXXXXXXX). Email titled "Re: Flagged Canvassers".

The following was stated in the email:

"Red Flags\_

9/9

Paulette Bradley- Chris Jones- NSA

Tarik Prescxeon- Chester Featherstar- NSA

9/5Verification calls-

IND2654- Velma Anderson-Romello McGee- phone number belongs to buisness

IND2662-Raymond Lowe-Laurell Dailey-Couldn't verify address

IND2667-Anthony Washington-September benson-"No one lives here by that name"

IND-2651-Rodney Davis-Terence White- phone number to business

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017



**Affidavit for Probable Cause**

**From:** Lieutenant Jeffrey C. Hearon

On Sat, Sep 10, 2016 at 8:18 PM, Allison Baker <XXXXXXXXXXXX> wrote:

**Red Flags**

Ebony Randle- IND-2606 -Nathan King“Not at this number”

Joseph Williams- IND-2635- Frances Salazar- address belongs to office building, →Verification call- number to a painting company

Miya Hendon- LaRanda Wells- no such address

Craig Cartwright- Stacy Williams- address to metropolitan Baptist center"

09/09/2016- 2:56 PM

From: Natalie Mitchell (XXXXXXXXXXXX), To: Alison Baker (XXXXXXXXXXXX). Email titled "IVRP Rental Vehicle and Reimbursement Policy". The following was stated in the email:  
*"Hi Allison - Thanks again for sending the completed application, NDA, and banking info. Please find attached two documents explaining our reimbursement and vehicle rental policies. You may not need"*

09/15/2016- 12:30 PM

From: Natalie Mitchell (XXXXXXXXXXXX), To: Alison Baker (XXXXXXXXXXXX).  
Email titled "2016.09.15\_IVRP\_IN\_Allison Daniels Reimbursement Block by Block". The following was stated in the email:  
*"Allison, did you send me the excel file? I don't see it attached. Also, please use the file name format and subject line specified in the Reimbursement policies doc, attached. Don't hesitate to"*

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

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**From:** Lieutenant Jeffrey C. Hearon

09/21/2016- 12:23 PM

To Holiday Burke (XXXXXXXXXX) in a Forwarded message from Natalie Mitchell (XXXXXXXXXX). Date: Mon., Aug. 29, 2016, at 3:47 PM. Email titled "*IVRP Reimbursements & Rental Vehicles" To: Felecia*".

Attachment included document titled "IN Rental Vehicle Protocol.docx, IN Reimbursement Policy.docx".

09/21/2016- 6:39 PM

To Holiday Burke (XXXXXXXXXX) in a Forwarded message from Trezell Ragas (XXXXXXXXXX). Date: Wed., Sep. 21, 2016, at 6:38 PM. Email titled "Accountability". Attachment included document titled "ACCOUNTABILITY\_IVRP.xls".

09/22/2016- 06:44:14 PM

To Holiday Burke (XXXXXXXXXX) from Natalie Mitchell (XXXXXXXXXX), cc: Karim Aziz (XXXXXXXXXX). Email titled "onboarding new staff". The following was stated in the email:

*"Holly –*

*Just wanted to make sure you were aware of the process for new staffers. Whenever you are ready to hire someone new, send them an email with the attached documents to sign. CC me on the email and let me know their official start date and their pay rate. I will take it from there (will make sure they get their docs back to us and that we get them set up with Admin).*

*cc:ing Karim so he has the most up to date documents also.*

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

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**From:** Lieutenant Jeffrey C. Hearon

*Thanks!*

*NKM*

--

*Natalie K. Mitchell*  
XXXXXXXXXXXX "

9/23/2016- 08:02:22 PM

From: Holiday Burke (XXXXXXXXXXXX), To: Ryan Garner (XXXXXXXXXXXX), cc: Trezell Ragas (XXXXXXXXXXXX). Email titled "Lake County Drop". The following was stated in the email:

*Ryan,*

*Trezell and I just spoke about this. I will make the drops from now at any location so I can properly answer any question they have. I have a good relationship with a women who oversees the office staff at Lake county and can follow up with her today about that canvasser/any other questions.*

*The issue with the forms, Trezell informed me, is that the office staff helped divide counties by what's on the reg card (full of human error) when we normally divide by zip code and search any address missing a zip code. Obviously this is not the time to be sloppy. No more weird things from here on out, fingers crossed.*

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017\_\_\_\_\_

**Affidavit for Probable Cause**

**From:** Lieutenant Jeffrey C. Hearon

*Holiday*

*On Fri, Sep 23, 2016 at 3:45 PM, Ryan Garner <XXXXXXXXXX> wrote:*

*----- Forwarded message -----*

*From: Jeff Macey <XXXXXXXXXX >  
Date: Fri, Sep 23, 2016 at 3:42 PM  
Subject: Lake County drop  
To: "XXXXXXXXXX" <XXXXXXXXXX>*

*Ryan,*

*I'm headed back from Lake County. Things were a little weird today because the forms weren't really organized that well (a lot of out of counties slipped thru) and the Clerk had a couple questions about phone calls regarding a specific canvasser and communications he or she made regarding van service.)*

*Unfortunately, Trezell was brand new to the area and couldn't answer the questions but this was a little different today than my last drop here and any of the drops in Marion County.*

*Give me a call at XXXXXXXXXXXX if you have questions. I don't anticipate problems but they probably will have lots of questions next time we are in there.*

*Thanks,  
Jeff*

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Lieutenant Jeffrey C. Hearon

*Sent from my iPhone*

--

*Ryan Garner*

*cell: XXXXXXXXXXXX*

*email: XXXXXXXXXX*

*web: www.fieldstrategies.com*

10/3/2016- 04:51:18 PM

To: Holiday Burke (XXXXXXXXXX), From: Helena Campbell (XXXXXXXXXX). Email titled "Out of County Update". The following was stated in the email:

*" We have 8 good registrations Elkhart County, and 1 Problematic; We have 4 good registrations for Porter County, and 1 Problematic; We have 2 good registrations for Starke County, and 1 Problematic; We 2 Problematic for Kosciusko; We have 2 for Jasper County; and 1 for both Marion & Tippacanoë."*

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Lieutenant Jeffrey C. Hearon

Additionally, the reviewed data indicated that employees of the IVRP would upload the information from the completed Indiana Voter Registration Applications into a system identified as "regtrack". "Regtrack" appears to be administered by a company previously identified as "Field Strategies", based in Washington DC. This was based on the first Field Strategies/RegTrak spreadsheets of the IVRP Canvasser statistic information found on the computer seized from the IVRP Offices on October 4, 2016.

A review of those spreadsheets indicated that the IVRP Officials had flagged numerous registrations that had been received from their canvassers during what internal correspondences indicate was "the verification process". I reviewed several of the spreadsheets that were contained in the computer and identified (3) representative voter registration entries that indicated that there were problems with the voter registration applications. The registrations that were investigated are listed below:

1. Lashl Frazier  
DOB XXXXXXXXXXXX  
XXXXXXXXXX  
Indianapolis, Indiana XXXXX

A note on the spreadsheet stated, "says she did not register to vote, her daughter used her name, she lives in Florida".

On November 29, 2016, at approximately 1030 hours, Ms. Shmi Anderson, daughter of Lashl Frazier, was interviewed at her residence located at XXXXXXXXXXXX, Indianapolis, IN. The interview was audio recorded. Shmi Anderson was shown a voter registration application bearing the name of Lashl Frazier, dated 06/27/16. She was asked if she had been present when the I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

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application was completed and she had advised that she had not been present. Shmi arranged for a telephone interview with her mother. Lashl Frazier stated that she currently lives in Florida and is registered to vote there. Lashl stated that the last time she had visited Indianapolis was from 07/30/2016 to 08/2/2016. Lashl stated that she had not given permission to, or authorized anyone to complete a voter registration application on her behalf, and denied completing one in Indiana on 06/27/16. Lashl stated that she had received a call from a female at her #XXX-XXX-XXXX, inquiring if she had registered to vote in Indiana. Lashl advised that she told her that she had not registered because she lives in Florida. A copy of the voter registration with Lashl's information was sent to her via email and she indicated that the handwriting was not hers and that she did not complete the application.

2. Mario W. Funches

DOB XXXXXXXXXXXX

XXXXXXXXXXXX

Indianapolis, Indiana XXXXX

A note on the spreadsheet stated, "said he didn't register"

On November 22, 2016, at approximately 1020 hours, Mario Funches was interviewed at his workplace located at XXXXXXXXXXXX, Indianapolis, IN. He was shown the voter registration application bearing his name and processed date of 08/10/16. Mario stated that someone had approached him about registering to vote and that he had told that person that he could not vote because he was a felon. Mario confirmed that the information on the registration was correct, but denied writing it, signing it or authorizing anyone else to complete and sign it on his behalf. Mario did not know the canvasser, VanDarryl Hampton.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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3. Kylon D. Murry

XXXXXXXXXXXX

Indianapolis, Indiana XXXXX

A note on the spreadsheet stated, "under age"

On December 6, 2016, at approximately 1045 hours, Kylon Murry was interviewed at XXXXXXXXXXXX, Indianapolis, IN. Kylon was shown the voter registration application bearing his name and the processed date of 08/27/16. Kylon stated that he was at a library in Indianapolis when a canvasser approached him about registering to vote. Kylon informed the canvasser that he was 17 years old and that the canvasser asked him to use a date of birth that would make him old enough to vote. Kylon said the canvasser told him he was just trying to get paid. Kylon then complied and completed the voter registration application with the fictitious DOB of XX/XX/XXXX. The correct DOB for Kylon is XX/XX/XXXX. Kylon also stated that he remembered receiving a call from a female asking him questions about registering to vote and that he had told her the same details that he had explained to the canvasser concerning the circumstances of his voter registration.

RegTrak Usage

There is evidence that both Holiday Burke and Allison Baker (Allison J. Daniels) are users of the RegTrak system. There are e-mail messages that were sent to them regarding system updates and numerous internet artifacts of their accessing the regtrak.com website. It appeared that they had a wide range of access to the system including data entry, downloads, uploads, reports and verification. Their user names on RegTrak.com are "holidayburke" and "AllsionJ".

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017\_\_\_\_\_



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Verification

There is an e-mail from Mike Pfohl (XXXXXXXXXX) on 07/07/2016 that was titled "RCQM canvasser quality metric for IN". The original message had been sent to Ryan Garner at Field Strategies, and to Karim Aziz's Gmail account. The message discussing a data analysis feature in RegTrak to identify poor canvassers had then been forwarded to Burke. The only quality metrics recovered for the IVRP data was the spreadsheet called "(FS) Indiana Voter RCQM 6-30-2016.xlsx". Other e-mail messages indicated that Mike Pfohl appeared to be working directly on the RegTrak system (programmer, system manager).

There is also an e-mail containing an overview of the IVRP verification process that Burke had sent to Alison Baker on 08/27/2016. On 09/20/2016, this same email was sent to Trezell Ragas upon his arrival in Gary to start working on the verification process there. On 09/21/2016, Ragas sent Burke a spreadsheet in an e-mail titled "Accountability". This appeared to be the origin of the spreadsheet "ACCOUNTABILITY\_IVRP MM-DD-YYYY.xls". The Accountability spreadsheets had three tabs - "Caller Sheet", "List of Warnings and Fired", "Project Progress, Tracker and Data". The "List of Warnings and Fired" tab listed canvassers who had been warned and/or fired for errors/problems in voter registrations. These spreadsheets had been sent from Helena Campbell to Holiday Burke almost daily between the dates of 09/21/2016 to 10/03/2016. In the e-mail sent on 10/02/2016, Helena also noted:

*"All entries and calls have been made for Oct. 1st. Second round calls have been made for 09/26- 09/30. Registrations have been prepared for the drop. We have 598 good registrations for St. Joseph, and 54 problematic registrations for St. Joseph County. We have 340 good registrations for Lake County, and 19 problematic registrations for Lake County. We have 79 good registrations for LaPorte County, and 2 problematic registrations for LaPorte County. We*

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/s/ Jeffrey C. Hearon

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*Have 22 good out of county registrations, and 5 problematic registrations for out of county. We have 7 registrations from out of state, and we have 10 registrations with no zip. The registrations with no zip will be audited again tomorrow morning and added to county in which it belongs. Far as recruitment for today we have 57 all together; of those 7 are potential supervisors and 50 are potential canvassers. Lastly, we have 237 registrations for Oct. 2nd.”*

During this investigation, Indiana State Police District Investigative Commander F/Sgt. Brooks Johnson spoke with Frank Fotia, employee of the St. Joseph County Voter Registration Office. Frank Fotia advised that a person who had identified herself as Holiday Burke had dropped off numerous voter registration applications at the St. Joseph County Voter Registration Office. Frank Fotia stated that the voter registration office had confirmed (8) voter registration applications that contained fraudulent information. Frank Fotia advised that the voter registration applications were compared to on file voter registry records, and when compared, the St. Joseph County Voter Registry Office learned that some of the voter registry applications contained a false DOB and a false Social Security number. Frank Fotia stated that a deceased person’s name and identifying information was also used on one of the voter registration applications.

On October 6, 2016, Frank Fotia emailed copies of (8) voter registration applications that contained confirmed fraudulent information to F/Sgt. Johnson. On October 7, 2016, F/Sgt. Johnson again spoke to Frank Fotia in reference to this case. Frank Fotia advised F/Sgt. Johnson that on September 28, 2016, the IVRP dropped off (1,711) voter registration applications at the St. Joseph County Voter Registration Office, as well as an additional (769) voter registration applications on October 6, 2016. Frank advised that the IVRP representative that had dropped off the voter registration applications both times had used the name Holiday Burke. Frank confirmed that no one at the St. Joseph County Voter Registration Office had asked Holiday Burke to show an ID Card. Frank advised that he had not been present when the voter registration applications I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

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were dropped off on September 28, 2016, but that he had been present when the registration applications were dropped off on October 6, 2016. Frank described the female who had dropped off the voter registration applications on October 6, 2016, as being a white female, in her early twenties, thin, with shoulder length brown hair. Frank advised that the voter registration applications that were dropped off on September 28, 2016, contained a pink sticky note advising that the DOB's did not match, and that the voter registration applications that were dropped off on October 6, 2016, contained a yellow sticky note indicating that there were issues. Frank confirmed that the IVRP had not submitted any fraud affidavits when they dropped off voter registration applications on September 28, 2016, or on October 6, 2016.

On October 7, 2016, Indiana State Police Detective Ben Werner went to the St. Joseph County Voter Registration Office to obtain the two sticky notes. Detective Werner examined the sticky notes, later submitting them as items of evidence at the Bremen State Police Post. F/Sgt. Johnson reviewed the sticky notes and observed that the note that was submitted on September 28, 2016, stated the following: "*canvasser filled out every registration in this packet. Every date of birth is invalid*". The sticky note that was submitted on October 6, 2016 noted the following: "*St Joseph Problematic 61*".

Summary

Based on the above information, it appears that employees of the IVRP had uploaded most, if not all, of the information for the approximate (45,000) people who had completed a voter registration application at the request of the IVRP employees. "Field Strategies" appears to have provided the data tracking and analysis infrastructure to members of the IVRP. Holiday Burke and Allison Baker, in their positions as Verification Directors for the IVRP, used regtrak.com to enter and track their voter registration efforts and received reports in the form of spreadsheet

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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(CSV) files. The raw data appears to reside with "Field Strategies". Some of the regtrack.com spreadsheets that were located on the computers of both Holiday Burke and Allison Baker (Allison J. Daniels), contained data about the voters, the canvassers and the existence of forged and fictitious voter registration applications. From their emails, notes and spreadsheets that were located, it appears that the IVRP Officials knew of the forged and fictitious voter registration applications listed above and proceeded to submit them to various County voter registration offices, which is in violation of IC 3-14-3-1.1 and IC 3-14-2-1.

Under federal law 52 USC §21083 and IC 3-7-26.3-3 *et seq*, the official voter registration database for Indiana is the statewide database administered by the Indiana Secretary of State. Paper applications may be submitted to either the state office, one of the statutorily created county voter registration offices, or various other statutorily provided methods. However, when an application is received from anyone other than the state registration office, the information is verified, then immediately scanned and uploaded in the statewide system. Exclusive ownership and control of the statewide voter registration list is vested in the Indiana Secretary of State, located in Marion County, Indiana.

Based on the follow up investigation into each of these questionable applications, it is my belief that IVRP Employees knowingly or intentionally, made or uttered (submitted) a written instrument (voter registration forms) in such a manner that were purported to have been made by another person, at another time, with different provisions or by authority of one who did not give authority, IC 35-43-5-2. Moreover, IVRP employees knowingly processed and submitted voter registration applications known by IVRP employees to be materially false, fictitious or fraudulent in violation of IC 3-14-3-1.1. IC 3-7-32-8 requires in part, that a person who receives a completed application shall file the application with the appropriate voter registration office or election division not later than 10 days after the person initially receives the application.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

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Furthermore, if the person receives a completed application that the person has reason to believe is materially false, fictitious or fraudulent, the person shall deliver the application to the county election board not later than the deadline with a statement sworn or affirmed to under the penalties of perjury, setting forth the reason why the person believes the application may be materially false, fictitious, or fraudulent. At no time during this investigation did I locate a sworn statement or affidavit submitted by anyone from the IVRP indicating that any voter registration application was false, fraudulent or fictitious despite numerous emails, internal documents and notations indicating the contrary.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017\_\_\_\_\_

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION

Cause No: 49

STATE OF INDIANA )  
 )  
 vs. )  
 )

**INFORMATION**  
**COUNT I**  
**PROCURING OR SUBMISSION OF**  
**FALSE, FICTITIOUS, OR FRAUDULENT**  
**VOTER REGISTRATION APPLICATION**  
**I.C. 3-14-3-1.1(1)**  
**A LEVEL 6 FELONY**  
**COUNT II**  
**PERJURY**  
**I.C. 35-44.1-2-1(a)(1)**  
**A LEVEL 6 FELONY**

**DALLILA ALEXANDER**  
**B/Female**  
**DOB 4/25/1980**

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

On or about between May 1, 2016 and November 8, 2016, DALLILA ALEXANDER did knowingly procure or submit voter registration applications known by DALLILA ALEXANDER to be materially false, fictitious or fraudulent;

COUNT II

On or about between May 1, 2016 and November 8, 2016, DALLILA ALEXANDER did make a false, material statement under oath or affirmation, to-wit: that she accepted custody of a completed voter registration application from an applicant; knowing said statement to be false;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44.1-2-1 that the foregoing representations are true.

/s/ Jeremy Teipen  
Affiant

June 8, 2017  
Date

State's Witnesses:  
Jeffrey C. Hearon 5201 ISP

**TERRY R. CURRY**  
Marion County Prosecutor  
19th Judicial Circuit

Randy Pratt 5536 ISP  
Matt Lawrence 6464 ISP  
Jerry Gentry 6168 ISP  
William Vann 5220 ISP  
Leonard Langland 6352 ISP  
Amy S. Gaul 5934 ISP  
Jeremy C. Franklin 7554 ISP  
Scott R. Jarvis 6784 ISP  
David R. Preston 6065 ISP  
Cindy Mowery  
Ladonna Freeman  
Debra Gazvoda  
Mary Prewitt  
Michelle Cash  
Aarin K. Bowman-Merriweather  
Ronetta J. Hadede  
Ariana K. Bowman

/s/ Jeremy Teipen  
Deputy Prosecuting Attorney

## AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Lt. Jeffrey C. Hearon swears (affirms) that:

Information set forth below in this Probable Cause Affidavit is either personally known to Affiant, information obtained from other law enforcement sources, information obtained from public records and/or information from sources otherwise identified in this Affidavit. The facts developed from this investigation are as follows and are not inclusive of all information gathered and/or developed as a result of this ongoing investigation:

On or about August 23, 2016, the Hendricks County Clerk, Ms. Debbie Hoskins, contacted me and reported that during June, July, and August of 2016, a significant number of voter registration applications were received by her office from the Marion County Board of Voters Registration Office. The voter registration applications were submitted to their office by a voter registration drive organization called "The Indiana Voter Registration Project", hereafter referred to as IVRP. Upon reviewing and vetting the applications, the Hendricks County Clerk's Office noted many inconsistencies with the submitted applications and were concerned that some may be forged or fraudulent. Furthermore, Ms. Hoskins advised me that many of the applicants were already registered to vote, so the on-file registrations were compared to the newly submitted applications. The newly submitted applications had the following characteristics: very sloppy penmanship, missing information, and/or contained erroneous data, such as, but not limited to the following: Applicants' printed name not matching applicants' signature, missing applicants' telephone number, and applicant address not matching applicants' county of residence.

After learning this information, I scheduled a meeting with Indiana Secretary of State Connie Lawson to discuss these concerns and inquire about the Indiana Voter Registration Project

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

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**Affidavit for Probable Cause**

**From:** Lt. Jeffrey C. Hearon

(IVRP), and to inquire if they were a registered entity. Secretary Lawson and her staff were unaware of this organization and had not received any complaints.

During the subsequent Indiana State Police investigation on September 2, 2016, I spoke with Ms. Cindy Mowery and Ms. Ladonna Freeman, Co-Directors of the Marion County Board of Voters Registration. They reported that their office had received thousands of voter registration applications from "The Indiana Voter Registration Project". According to Ms. Mowery and Ms. Freeman, several of the voter registration applications were incomplete, and when compared to on-file voter registrations for the same applicants, their signatures did not match. This is consistent with the original findings by the Hendricks County Clerk's Office.

On September 6, 2016, Indiana State Police detectives went to the Marion County Board of Voters Registration to conduct follow up interviews with the directors. Detectives learned that the IVRP had submitted 27,377 voter applications. These applications were submitted by Holiday Burke and another unknown male named Karim (employees of the IVRP). Director Cindy Mowery became suspicious of the group and sent an attorney to the IVRP office headquarters located at 2425 N. Meridian Street, Indianapolis, IN. After observing the location, the attorney expressed concerns about the legitimacy of the organization and conveyed those concerns to Director Mowery. While detectives were speaking with the directors, personnel informed the detectives that Holiday Burke was currently dropping off voter registration applications. F/Sgt. William Vann and I conducted an investigative interview with Burke at the clerk's office.

The following information was learned through the interview: Burke conveyed that she was a community organizer with the Indiana Voter Registration Project (IVRP), a non-partisan voter registration drive. Burke stated that she receives her paychecks from a company identified as I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

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“Block by Block”. Burke stated the group targeted areas that were historically under represented, or disenfranchised, in order to encourage people to register to vote. This was achieved by hiring part time employees to target the identified areas and attempt to register people to vote. These employees would be paid \$50.00 per five hour shift. That same day, detectives traveled to the IVRP office located at 2425 N. Meridian Street, Indianapolis, IN. Upon arrival, detectives observed that the business did not have any signs on the door to signify an office for IVRP. A sign placed on the door instructed patrons to enter through the rear alley door. Detectives proceeded to the rear entry and upon entering, noted minimal furnishings, which consisted of folding tables and chairs. Detectives met with IVRP supervisor Ryan Garner. Garner provided additional details of IVRP. Garner stated that the IVRP maintains offices in both Indianapolis and Gary, IN. Detectives later confirmed the alleged office location in Gary was actually a vacant lot. Garner stated that IVRP worked for an organization called “Rebuild USA”, as well as a group of Washington DC based attorneys. Garner declined to provide additional details, such as, who his supervisors were, if they were a registered political action committee, or a not-for-profit organization registered with the State of Indiana. When detectives questioned Garner about the concerns of the registration applications, Garner responded by saying that IVRP attempts to verify the accuracy of the information, but IVRP is limited on the ability to fully vet them due to the deadline for submission.

Upon reviewing several suspected voter registration applications from the IVRP and determining several contained missing, erroneous or fraudulent information, detectives met with personnel from the Indiana Secretary of State's Office to relay their concerns. As a result, Secretary Connie Lawson distributed a public service announcement for the general public to verify their voter registration records, as well as a second letter directing all Clerk's offices in the State of Indiana to carefully review applications received by the IVRP. As detectives began to conduct follow up

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/s/ Jeffrey C. Hearon

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investigation into the questionable voter registration applications, detectives learned the following information:

\*Employees of IVRP were pressured to obtain (10) applications (quota) per shift, or risk termination.

\*Employees of IVRP were advised by IVRP supervisors to obtain their quota by any means necessary.

\*Employees of IVRP would duplicate information from actual voter registration files onto new applications to meet their quota.

\*Employees of IVRP would commonly not sign the applications and provide those applications to other employees who may not have obtained their quota of applications during their shifts.

Furthermore, on October 3, 2016, I applied for a search warrant for the offices of the IVRP. On October 4, 2016, detectives with the Indiana State Police executed a search warrant on the IVRP offices. During the course of the search warrant and subsequent review of information, detectives found evidence of 34,000 voter registration applications encompassing (56) Indiana counties. Furthermore, many of the applications had notations on them that the submitted applications were for juveniles, not United States citizens, people who lived out of state, had incorrect telephone numbers, incorrect zip codes, invalid or non-existent addresses, notations that real voters denied making application when contacted and notations for multiple registrations. Additionally, detectives recovered multiple voter registration applications that had not been submitted, which is in violation of IC 3-14-2-16. Holiday Burke, Verification Director from the IVRP, was informed of this violation, and that an affidavit would need to be submitted and tendered to the respective Clerk's office for each application that was incomplete, or suspected of being fraudulent or forged.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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As a result of these findings, Indiana State Police Detectives initiated an investigation into the veracity of numerous voter registration applications that contained missing, incomplete, and/or erroneous applicant information and other problems as noted in the aforementioned investigation. The following facts are the results of Affiant's investigation:

I obtained (2) suspected fraudulent voter registration application forms from Hendricks County Clerk Debbie Hoskins, in which both were certified by Dallila Alexander, a former employee of the "Indiana Voter Registration Project". Upon receiving them, I began to conduct a follow up investigation to determine the legitimacy of each application. I then determined through investigative means that both of the applications were fraudulent.

The applications I reviewed were for an Ariana K. Bowman, DOB XX/XX/XXXX and an Aarin K. Bowman-Merriweather, DOB XX/XX/XXXX. Address listed on both applications, XXXXXXXXXXXXXXX, Avon, IN. The writing on both applications appear similar and both were certified by Dallia Alexander. I compared the signature on the suspect application for Ariana K. Bowman, DOB 07/13/1995, to an on file voter registration and BMV record for Ariana K. Bowman, and it did not match. I then traveled to the address provided on both applications, 384 Great Lakes West Circle, Avon, IN., and determined that neither Ariana Bowman or Aarin K. Bowman-Merriweather had ever lived at that address.

On September 30, 2016, at approximately 1538 hours, Ariana K. Bowman was interviewed at her residence in Terre Haute. Ms. Bowman stated that she is registered to vote at her current address in Terre Haute, and had never registered to vote in Hendricks County. She explained that she had registered to vote online and had never filled out a paper voter registration application. Ms. Bowman reported that Aarin K. Bowman-Merriweather was her younger brother. Ms. Bowman contacted her mother, RONNETTA J. HADEDE, DOB 10/31/1977, who advised I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

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Ariana that she (Ms. Hadede) had filled out voter registration applications for Ariana and Aarin using her address in Avon. When showing Ms. Bowman the applications, she was able to confirm that the handwriting on the applications belonged to her mother, but the signature in the certified statement of acceptance, "Dallila Alexander", was not that of her mother.

Ms. Bowman then contacted her mother, Ms. Hadede, on her cell phone. Ms. Hadede stated that a group of (3) people had approached her at a gas station on the Westside of Indianapolis. She described one of the people as a female who had a federal employee badge. The female with the badge inquired if she was registered to vote. Ms. Hadede advised that she had never met the woman before. The woman asked her how many people in her household were over the age of 18. Ms. Hadede advised the woman that she had three children who were all above the age of 18. Ms. Hadede filled out applications for herself, her daughter, Ariana Bowman, and her son, Aarin Bowman-Merriweather, telling the woman that two of her adult children lived in Terre Haute. The woman had Ms. Hadede complete voter registration applications for both her son and her daughter, despite neither being present. According to Ms. Hadede, the woman with the federal employee badge was supposed to call both her son and her daughter to obtain the rest of their information in order to complete the voter registration process for each application. Ms. Hadede reported that she had signed Ariana and Aarin's names on the applications. Ms. Hadede advised that she was not aware that Ms. Bowman was already registered to vote in Vigo County. Ms. Hadede could not remember the name of the company, but remembered them saying that they were located near 20th Street and Meridian Street in Indianapolis.

On February 13, 2017, at approximately 1315 hours, I obtained a recorded interview with Ronnetta Hadede. Ms. Hadede repeated her account of completing the registrations for her son and daughter, at the request of Dallila Alexander. I showed her photo array number 136245, containing a known photograph of Dallila Alexander in position number 5. Ms. Hadede I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

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identified the photograph in position 5 (Dallila Alexander) as the person who had her fill out the registrations for her son and daughter.

On February 15, 2017, I contacted Aarin Bowman-Merriweather who advised that he had not completed, or given permission for anyone to complete a voter registration application for him.

On February 13, 2017, at approximately 1600 hours, I attempted to interview Dallila Alexander at her residence in Speedway, IN. She refused to provide a statement and requested that I speak with the attorney that was hired for her by the "Indiana Voter Registration Project". She advised that Jeffrey Macey was the name of the attorney.

Whoever accepts custody of a completed voter application form from a prospective voter is required to sign a "certified statement of acceptance" before filing the application with a county voter registration office. The certified statement of acceptance states that the signer affirms "under the penalties for perjury that I accepted custody of this completed application from the applicant."

Based on the follow up investigation into each of these questionable applications, it is my belief that Dallila Alexander, knowingly or intentionally, caused to be made or uttered, a written instrument (voter registration forms) in such a manner that it were purported to have been made by another person, at another time, with different provisions or by authority of one who did not give authority, IC 35-43-5-2. Moreover, Dallila Alexander conspired to subscribe the name of another person to an affidavit of registration that contains false information, IC 3-14-2-3, and knowingly submitted voter registration applications known by Dallila Alexander to be materially false, fictitious or fraudulent, IC 3-14-3-1.1. Lastly, Dallila Alexander made a false, material statement under oath or affirmation, knowing the statements to be false or not believing it to be I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

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true as noted in the Certified Statement of Acceptance on the application form, IC 35-44.1-2-1,  
and submitted them as accurate and correct for processing.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017\_\_\_\_\_

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION

Cause No: 49

STATE OF INDIANA )  
 )  
 vs. )  
 )

**INFORMATION**  
**COUNT I**  
**PROCURING OR SUBMISSION OF**  
**FALSE, FICTITIOUS, OR FRAUDULENT**  
**VOTER REGISTRATION APPLICATION**  
**I.C. 3-14-3-1.1(1)**  
**A LEVEL 6 FELONY**  
**COUNT II**  
**COUNTERFEITING**  
**I.C. 35-43-5-2(a)(1)(D)**  
**A LEVEL 6 FELONY**

**Holiday Burke**  
**W/Female**  
**DOB 1/7/1992**

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

On or about between May 1, 2016 and November 8, 2016, Holiday Burke did knowingly procure or submit voter registration applications known by Holiday Burke to be materially false, fictitious or fraudulent;

COUNT II

On or about between May 1, 2016 and November 8, 2016, Holiday Burke, did knowingly make or utter a written instrument, to-wit: one or more voter registration applications; in such a manner that it/they purports/purported to have been made by by another person and/or by authority of one who did not give authority;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44.1-2-1 that the foregoing representations are true.

/s/ Jeremy Teipen  
Affiant

June 9, 2017  
Date

**TERRY R. CURRY**  
Marion County Prosecutor



State's Witnesses:

Jeffrey C. Hearon 5201 ISP  
Brooks Johnson 5914 ISP  
Matt Lawrence 6464 ISP  
Jerry Gentry 6168 ISP  
William Vann 5220 ISP  
Leonard Langland 6352 ISP  
Amy S. Gaul 5934 ISP  
Jeremy C. Franklin 7554 ISP  
Scott R. Jarvis 6784 ISP  
David R. Preston 6065 ISP  
Cindy Mowery  
Ladonna Freeman  
Michelle Cash  
Pamela McCreary  
Kylon D. Murry  
Cesar Cepeda  
Lashl Frazier  
Mario W. Funches

19th Judicial Circuit

/s/ Jeremy Teipen  
Deputy Prosecuting Attorney

## AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Lieutenant Jeffrey C. Hearon swears (affirms) that:

Information set forth below in this Probable Cause Affidavit is either personally known to Affiant, information obtained from other law enforcement sources, information obtained from public records and/or information from sources otherwise identified in this Affidavit. The facts developed from this investigation are as follows and are not inclusive of all information gathered and/or developed as a result of this ongoing investigation:

On or about August 23, 2016, the Hendricks County Clerk, Ms. Debbie Hoskins, contacted me and reported that during June, July, and August of 2016, a significant number of voter registration applications were received by her office from the Marion County Board of Voters Registration Office. The voter registration applications were submitted to their office by a voter registration drive organization called "The Indiana Voter Registration Project", hereafter referred to as IVRP. Upon reviewing and vetting the applications, the Hendricks County Clerk's Office noted many inconsistencies with the submitted applications and were concerned that some may be forged or fraudulent. Furthermore, Ms. Hoskins advised me that many of the applicants were already registered to vote, so the on-file registrations were compared to the newly submitted applications. The newly submitted applications had the following characteristics: very sloppy penmanship, missing information, and/or contained erroneous data, such as, but not limited to the following: Applicants' printed name not matching applicants' signature, missing applicants' telephone number, and applicant address not matching applicants' County of residence.

After learning this information, I scheduled a meeting with Indiana Secretary of State Connie Lawson to discuss these concerns and inquire about the Indiana Voter Registration Project

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Lieutenant Jeffrey C. Hearon

(IVRP), and if they were a registered entity. Secretary Lawson and her staff were unaware of this organization and had not received any complaints.

During the subsequent Indiana State Police investigation on September 2, 2016, I spoke with Ms. Cindy Mowery and Ms. Ladonna Freeman, Co-Directors of the Marion County Board of Voters Registration. They reported that their office had received thousands of voter registration applications from "The Indiana Voter Registration Project". According to Ms. Mowery and Ms. Freeman, several of the voter registration applications were incomplete, and when compared to on-file voter registrations for the same applicants, their signatures did not match. This is consistent with the original findings by the Hendricks County Clerk's Office.

On September 6, 2016, Indiana State Police detectives went to the Marion County Board of Voters Registration to conduct follow up interviews with the directors. Detectives learned that the IVRP had submitted (27,377) voter applications. These applications were submitted by Holiday Burke and another unknown male named Karim (employees of the IVRP). Director Cindy Mowery became suspicious of the group and sent an attorney to the IVRP office headquarters located at 2425 N. Meridian Street, Indianapolis, IN. After observing the location, the attorney expressed concerns about the legitimacy of the organization and conveyed those concerns to Director Mowery. While detectives were speaking with the directors, personnel informed the detectives that Holiday Burke was currently dropping off voter registration applications. F/Sgt. William Vann and I conducted an investigative interview with Burke at the clerk's office. The following information was learned through the interview: Burke conveyed that she was a community organizer with the Indiana Voter Registration Project (IVRP), a non-partisan voter registration drive. Burke stated that she receives her paychecks from a company identified as "Block by Block". Burke stated that the group targeted areas that were historically under represented or disenfranchised, in order to encourage people to register to vote. This was I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

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**From:** Lieutenant Jeffrey C. Hearon

achieved by hiring part time employees to target the identified areas and attempt to register people to vote. These employees would be paid \$50.00 per five hour shift. That same day, detectives traveled to the IVRP office at 2425 N. Meridian Street, Indianapolis, IN. Upon arrival, detectives observed that the business did not have any signs on the door to signify an office for IVRP. A sign placed on the door instructed patrons to enter through the rear alley door. Detectives proceeded to the rear entry and upon entering, noted minimal furnishings, which consisted of folding tables and chairs.

Detectives met with IVRP supervisor Ryan Garner. Garner provided additional details of IVRP. Garner stated that the IVRP maintains offices in both Indianapolis and Gary, IN. Detectives later confirmed that the alleged office location in Gary was actually a vacant lot. Garner stated that the IVRP worked for an organization called "Rebuild USA", as well as a group of Washington DC based attorneys. Garner declined to provide additional details, such as, who his supervisors were, if they were a registered political action committee or a not-for-profit organization registered with the State of Indiana. When detectives questioned Garner about the concerns of the registration applications, Garner responded by saying that IVRP attempts to verify the accuracy of the information, but IVRP is limited on the ability to fully vet them due to the deadline for submission.

Upon reviewing several suspected voter registration applications from the IVRP and determining several contained missing, erroneous or fraudulent information, detectives met with personnel from the Indiana Secretary of State's Office to relay the concerns. As a result, Secretary Connie Lawson distributed a public service announcement for the general public to verify their voter registration records, as well as a second letter directing all Clerk's offices in the State of Indiana to carefully review applications received by the IVRP. As detectives began to conduct follow up

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

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**From:** Lieutenant Jeffrey C. Hearon

investigation into the questionable voter registration applications, detectives learned the following information:

\*Employees of IVRP were pressured to obtain (10) applications (quota) per shift, or risk termination.

\*Employees of IVRP were advised by IVRP supervisors to obtain their quota by any means necessary.

\*Employees of IVRP would duplicate information from actual voter registration files onto new applications to meet their quota.

\*Employees of IVRP would commonly not sign the applications and provide those applications to other employees who may not have obtained their quota of applications during their shifts.

Furthermore, on October 3, 2016, I applied for a search warrant for the offices of the IVRP. On October 4, 2016, detectives with the Indiana State Police executed a search warrant on the IVRP offices. During the course of the search warrant and subsequent review of information, detectives found evidence of (34,000) voter registration applications encompassing (56) Indiana counties. Furthermore, many of the applications had notations on them that the submitted applications were for juveniles, not United States citizens, people who lived out of state, had incorrect telephone numbers, incorrect zip codes, invalid or non-existent addresses, notations that real voters denied making application when contacted and notations for multiple registrations. Additionally, detectives examined multiple voter registration applications that had been completed months before but had not been submitted, which is in violation of IC 3-7-32-8. Among the dated voter registration applications were sixteen applications submitted by Tina Pace, seven submitted by Kiziah Tyler and one submitted by Dominique Squires. I directed that all the late applications be photographed, and informed Holiday Burke, Verification Director for the IVRP, that it was a violation of Indiana code to hold any application in excess of 10 days. As I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

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**From:** Lieutenant Jeffrey C. Hearon

I indicated above, several of the applications appeared to be fictitious. I picked up and reviewed a packet of sixteen applications certified and submitted by Tina Pace. I questioned Holiday Burke why there were so many for Tina Pace and why they had not been submitted. She stated "because she had problems with her registrations". I asked her what she meant and asked her if that meant they were fictitious. Ms. Burke confirmed that they were in fact, fictitious and made a general statement that the reason they had not submitted the late applications is because they were either incomplete or fictitious. I then advised her that an affidavit would need to be submitted and tendered to the respective Clerk's office for each application that was suspected of being fraudulent or forged.

I assigned Detective Randy Pratt to conduct a follow up investigation on the applications submitted by Tina Pace and Kiziah Tyler. Detective Pratt contacted Kiziah Tyler who confessed to forging all of the applications except one. Detective Pratt then contacted Tina Pace who admitted to forging multiple applications but could not identify which were forged and which were legitimate.

The application I examined certified by Dominique Squires was for Cesar Cepeda. The application for Mr. Cepeda was incomplete, only listing his first name, last name, telephone number, confirmed that he was a United States Citizen, over the age of 18, contained his alleged signature, but was missing his DOB and address.

On or about October 11, 2016, Holiday Burke submitted numerous voter registration applications to the Marion County Board of Voter Registration Board. Included in those applications were the voter registrations certified by Dominique Squires, Kiziah Tyler and Tina Pace. I was made aware of the fact that applications had been dropped off by Marion County Voter Registration Co-Director Cindy Mowery and I requested a copy of each of those applications. Ms. Mowery I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

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advised that Holiday Burke did not submit an affidavit indicating that any of the voter registrations were materially false. I examined a copy of the application Ms. Burke dropped off for Cesar Cepeda and realized that it had been altered by adding a DOB and an address. On November 3, 2016, Mr. Cepeda was interviewed and advised that he had been approached by a black female in a Meijer parking lot, inquiring about him registering to vote. Cepeda advised her that he could not vote because he was not a US citizen. The female had then asked him for his name and phone number, which he had verbally provided to her. Cepeda advised that he had not filled out nor signed a voter registration application. Cepeda was then shown a copy of the application in which he denied completing and he advised that it was not even his handwriting.

On October 14, 2016, a search warrant was obtained to search the data contained in the computers that were seized from the IVRP offices on October 4, 2016. Members of the Indiana State Police Cyber Crime Unit reviewed the data and determined that employees of the IVRP would upload the information from the completed voter registration applications into a system identified as "regtrack", which appears to be administered by a company identified as "Field Strategies", based in Washington DC. It appeared that Holiday Burke had been working with this organization for quite some time and had been involved with projects in other areas, including Florida and Texas. Her first work related to Indiana appeared to have started in May of 2016. This was based on the first Field Strategies/RegTrak spreadsheets of IVRP Canvasser statically information found on her computer.

A review of those spreadsheets indicated that IVRP Officials had flagged numerous registrations that had been received from their canvassers during what internal correspondences indicate was "the verification process". I reviewed several of the spreadsheets that were contained in Holiday Burke's computer and identified (3) representative voter registration entries that indicated that

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/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Lieutenant Jeffrey C. Hearon

there were problems with the voter registration applications. The registrations that were investigated are listed below:

1. Lashl Frazier

DOB XX/XX/XXXX

XXXXXXXXXXXXXX

Indianapolis, Indiana XXXXX

A note on the spreadsheet stated, "says she did not register to vote, her daughter used her name and she lives in Florida"

On November 29, 2016, at approximately 1030 hours, Ms. Shmi Anderson, daughter of Lashl Frazier, was interviewed at her residence, XXXXXXXXXXXXX, Indianapolis, IN. The interview was audio recorded. Shmi Anderson was shown a voter registration application bearing the name of Lashl Frazier, dated 06/27/16. She was asked if she had been present when the application was completed and she had advised that she was not. Shmi arranged for a telephone interview of her mother. Lashl Frazier stated that she currently lives in Florida and is registered to vote there. Lashl stated that the last time she had visited Indianapolis was from 07/30/2016 to 08/2/2016. Lashl stated that she had not given permission to, or authorized anyone to complete a voter registration application on her behalf and denied completing one in Indiana on 06/27/16. Lashl stated that she had received a call at her #XXX-XXX-XXXX, from a female inquiring if she had registered to vote in Indiana. Lashl advised that she told her that she had not registered because she lives in Florida. A copy of the voter registration with Lashl's information was sent to her via email and she indicated that the handwriting was not hers and that she did not complete the application.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

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**Affidavit for Probable Cause**

**From:** Lieutenant Jeffrey C. Hearon

2. Mario W. Funches

DOB XX/XX/XXXX

XXXXXXXXXXXX

Indianapolis, Indiana XXXXX

A note on the spreadsheet stated, "said he didn't register"

On November 22, 2016, at approximately 1020 hours, I interviewed Mario Funches at his workplace, located at XXXXXXXXXXXX, Indianapolis, IN. He was shown the voter registration application bearing his name and processed date of 8/10/16. Mario stated that someone had approached him about registering to vote and that he had told that person that he could not vote because he was a felon. Mario confirmed that the information on the registration was correct, but denied writing it, signing it or authorizing anyone else to complete and sign it on his behalf. Mario did not know the canvasser, VanDarryl Hampton.

3. Kylon D. Murry

XXXXXXXXXXXX

Indianapolis, Indiana XXXXX

A note on the spreadsheet stated, "under age"

On December 6, 2016, at approximately 1045 hours, Kylon Murry was interviewed at XXXXXXXXXXXX Indianapolis, IN. Kylon was shown the voter registration application  
I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

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**From:** Lieutenant Jeffrey C. Hearon

bearing his name and the date 8/27/16. Kylon stated that he was at a library in Indianapolis when a canvasser approached him about registering to vote. Kylon informed the canvasser that he was 17 years old and that the canvasser asked him to use a date of birth that would make him old enough to vote. Kylon said the canvasser told him he was just trying to get paid. Kylon then complied and completed the voter registration application with the fictitious DOB of 2/27/1998. Kylon's correct DOB is XX/XX/XXXX. Kylon said he later remembered receiving a call from a female asking him questions about registering to vote and that he had told her the same details that he had explained to the canvasser concerning the circumstances of his voter registration.

**RegTrak Usage**

There was evidence that Holiday Burke is a user of the RegTrak system. There were e-mail messages that were sent to her regarding system updates and numerous internet artifacts of her accessing the regtrak.com website. It appeared that she has a wide range of access to the system including data entry, downloads, uploads, reports and verification. Her user name on RegTrak.com is "holidayburke".

**Verification**

There was one e-mail from Mike Pfohl ([mike@pf-data.com](mailto:mike@pf-data.com)) on 7/07/2016 that was titled, "RCQM canvasser quality metric for IN". The original message had been sent to Ryan Garner at Field Strategies and to Karim Aziz's Gmail account. The message had then been forwarded to Burke, discussing a data analysis feature in RegTrak to identify poor canvassers. The only quality metrics recovered for the IVRP data was the spreadsheet called, "(FS) Indiana Voter RCQM 6-30-2016.xlsx". Other e-mail messages indicated that Mike Pfohl appeared to be working directly on the RegTrak system (programmer, system manager).

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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There was also an e-mail containing an overview of the IVRP verification process that Burke had sent to Alison Baker on 8/27/2016. This same email had also been sent to Trezell Ragas on 9/20/2016 once he had arrived in Gary to start working on the verification process there. On 9/21/2016, Ragas sent Burke a spreadsheet in an e-mail titled, "Accountability". This appeared to be the origin of the spreadsheet, "ACCOUNTABILITY\_IVRP MM-DD-YYYY.xls". The Accountability spreadsheets had three tabs – "Caller Sheet", "List of Warnings and Fired", "Project Progress, Tracker and Data". The "List of Warnings and Fired" tab listed canvassers who had been warned and/or fired for errors/problems in voter registrations. These spreadsheets had been sent from Helena Campbell to Holiday Burke almost daily between the dates of 9/21/2016 to 10/03/2016. In the e-mail sent on 10/02/2016, Helena also noted:

"All entries and calls have been made for Oct. 1st. Second round calls have been made for 09/26-09/30. Registrations have been prepared for the drop. We Have 598 good registrations for St. Joseph, and 54 problematic registrations for St. Joseph county. We have 340 good registrations for Lake County, and 19 problematic registrations for Lake County. We have 79 good registrations for LaPorte County, and 2 problematic registrations for LaPorte County. We Have 22 good out of county registrations, and 5 problematic registrations for out of county. We have 7 registrations from out of state, and we have 10 registrations with no zip. The registrations with no zip will be audited again tomorrow morning and added to county in which it belongs. Far as recruitment for today we have 57 all together; of those 7 are potential supervisors and 50 are potential canvassers. Lastly, we have 237 registrations for Oct. 2nd."

During this investigation, Indiana State Police District Investigative Commander F/Sgt. Brooks Johnson spoke with Frank Fotia, employee of the St. Joseph County Voter Registration Office. Frank Fotia advised that a person who had identified herself as Holiday Burke had dropped off I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

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numerous voter registration applications at the St. Joseph County Voter Registration Office. Frank Fotia stated that the voter registration office had confirmed (8) voter registration applications that contained fraudulent information. Frank Fotia advised that the voter registration applications were compared to on file voter registry records, and when compared, the St. Joseph County Voter Registry Office learned that some of the voter registry applications contained a false DOB and a false Social Security Number. Frank Fotia stated that a deceased person's name and identifying information was also used on one of the voter registration applications.

On October 6, 2016, Frank Fotia emailed copies of (8) voter registration applications that contained confirmed fraudulent information to F/Sgt. Johnson. On October 7, 2016, F/Sgt. Johnson again spoke to Frank Fotia in reference to this case. Frank Fotia advised F/Sgt. Johnson that on September 28, 2016, the IVRP dropped off (1,711) voter registration applications at the St. Joseph County Voter Registration Office. On October 6, 2016, the IVRP dropped off an additional (769) voter registration applications. Frank Fotia stated that both times the IVRP representative dropped off the voter registration applications, she had used the name "Holiday Burke". Frank Fotia described the female using the name Holiday Burke who had dropped off the voter registration applications on October 6, 2016, as being a white female, in her early twenties, thin and with shoulder length brown hair. Frank Fotia advised that he had not been present on September 28, 2016 when the voter registration applications were dropped off. Frank Fotia advised that the voter registration applications that were dropped off on September 28, 2016, contained a pink sticky note advising that the dates of birth did not match. Frank Fotia advised that the voter registration applications that were dropped off on October 6, 2016, contained a yellow sticky note indicating that there were issues. Frank Fotia confirmed that the IVRP representative did not submit any fraud affidavits when they dropped off voter registration applications on September 28, 2016, or on October 6, 2016.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

---

AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Lieutenant Jeffrey C. Hearon

On October 7, 2016, Indiana State Police Detective Ben Werner went to the St. Joseph County Voter Registration Office to obtain the two sticky notes. Detective Werner examined the sticky notes, later submitting them as items of evidence at the Bremen State Police Post. F/Sgt. Johnson reviewed the sticky notes and observed that the note that was submitted on September 28, 2016, stated the following: "canvasser filled out every registration in this packet. Every date of birth is invalid". The sticky note that was submitted on October 6, 2016 noted the following: "St Joseph Problematic 61".

**Summary**

Based on the above information, it appears that Holiday Burke and other employees of IVRP had uploaded most, if not all of the approximately (45,000) people's information who had completed a voter registration application at the request of Indiana Voter Registration Project employees.

"Field Strategies" appears to have provided the data tracking and analysis infrastructure to Holiday Burke as well as other members of the IVRP. Holiday Burke, in her position as Verification Director for IVRP, used regtrak.com to enter and track their voter registration efforts and received reports in the form of spreadsheet (CSV) files. The raw data appears to reside with "Field Strategies".

Some of the spreadsheets from regtrak.com, located on Holiday Burke's computer, contained data about the voters, canvassers and the existence of forged and fictitious voter registration applications. From her emails, notes and spreadsheets that were located, it appears that Holiday Burke knew of the forged and fictitious voter registration applications listed above and submitted them to various county voter registration offices in violation of IC 3-14-3-1.1 and IC 3-14-2-1.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Lieutenant Jeffrey C. Hearon

Under federal law 52 USC §21083 and Indiana Code 3-7-26.3-3 *et seq*, the official voter registration database for Indiana is the statewide database, administered by the Indiana Secretary of State. Paper applications may be submitted to either the state office, one of the statutorily created county voter registration offices, or various other statutorily provided methods. However, when an application is received in other than the state registration office, the information is verified and then immediately scanned and uploaded in the statewide system. Exclusive ownership and control of the statewide voter registration list is vested in the Indiana Secretary of State, located in Marion County, Indiana

Based on the follow up investigation into each of these questionable applications, it is my belief that Holiday Burke knowingly or intentionally, made or uttered a written instrument (voter registration forms) in such a manner that were purported to have been made by another person, at another time, with different provisions or by authority of one who did not give authority, IC 35-43-5-2. Moreover, Holiday Burke knowingly submitted voter registration applications known by Holiday Burke to be materially false, fictitious or fraudulent in violation of IC 3-14-3-1.1.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION

Cause No: 49

STATE OF INDIANA )  
 )  
 vs. )  
 )

**INFORMATION**  
**COUNT I**  
**PROCURING OR SUBMISSION OF**  
**FALSE, FICTITIOUS, OR FRAUDULENT**  
**VOTER REGISTRATION APPLICATION**  
**I.C. 3-14-3-1.1(1)**  
**A LEVEL 6 FELONY**  
**COUNT II**  
**PERJURY**  
**I.C. 35-44.1-2-1(a)(1)**  
**A LEVEL 6 FELONY**

**Makayla Colbert**  
**B/Female**  
**DOB 10/20/1997**

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

On or about between May 1, 2016 and November 8, 2016, Makayla Colbert did knowingly procure or submit voter registration applications known by Makayla Colbert to be materially false, fictitious or fraudulent;

COUNT II

On or about between May 1, 2016 and November 8, 2016, Makayla Colbert did make a false, material statement under oath or affirmation, to-wit: that she accepted custody of a completed voter registration application from an applicant; knowing said statement to be false;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44.1-2-1 that the foregoing representations are true.

/s/ Jeremy Teipen  
Affiant

June 9, 2017  
Date

**TERRY R. CURRY**  
Marion County Prosecutor  
19th Judicial Circuit

State's Witnesses:  
Jeffrey C. Hearon 5201 ISP

Nick Alspach 8082 ISP  
Matt Lawrence 6464 ISP  
Jerry Gentry 6168 ISP  
William Vann 5220 ISP  
Leonard Langland 6352 ISP  
Amy S. Gaul 5934 ISP  
Jeremy C. Franklin 7554 ISP  
Scott R. Jarvis 6784 ISP  
David R. Preston 6065 ISP  
Cindy Mowery  
Ladonna Freeman  
Debra Gazvoda  
Mary Prewitt  
Michelle Cash  
Pamela McCreary  
Jimmy Laws Jr.

/s/ Jeremy Teipen  
Deputy Prosecuting Attorney



# AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Lieutenant Jeffrey C. Hearon swears (affirms) that:

Information set forth below in this Probable Cause Affidavit is either personally known to Affiant, information obtained from other law enforcement sources, information obtained from public records and/or information from sources otherwise identified in this Affidavit. The facts developed from this investigation are as follows and are not inclusive of all information gathered and developed as a result of this ongoing investigation:

On or about August 23, 2016, the Hendricks County Clerk, Ms. Debbie Hoskins, contacted me and reported that during June, July, and August of 2016, a significant number of voter registration applications were received by her office from The Marion County Board of Voters Registration Office. The voter registration applications were submitted to their office by a voter registration drive organization called "The Indiana Voter Registration Project", hereafter referred to as IVRP. Upon reviewing and vetting the applications, The Hendricks County Clerk's Office noted many inconsistencies with the submitted applications and was concerned some may be forged or fraudulent. Furthermore, Ms. Hoskins advised many of the applicants were already registered to vote so the on-file registrations were compared to the newly submitted applications. The newly submitted applications had the following characteristics: very sloppy penmanship, missing information, and/or contained erroneous data, such as, but not limited to the following: Applicants' printed name not matching applicants' signature, missing applicant telephone number and applicant address not matching applicant county of residence.

After learning this information, I scheduled a meeting with Indiana Secretary of State Connie Lawson to discuss these concerns and inquire about the Indiana Voter Registration Project

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

---

AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Jeffrey C. Hearon

(IVRP), and if they were a registered entity. Secretary Lawson and her staff were unaware of this organization and had not received any complaints.

During the subsequent Indiana State Police investigation on September 2, 2016, I spoke with Ms. Cindy Mowery and Ms. Ladonna Freeman, Co-Directors of the Marion County Board of Voters Registration. They reported that their office had received thousands of voter registration applications from "The Indiana Voter Registration Project (IVRP)." According to Ms. Mowery and Ms. Freeman, several of the voter registration applications were incomplete, and when compared to on-file voter registrations for the same applicants, their signatures did not match. This is consistent with the original findings by the Hendricks County Clerk's Office.

On September 6, 2016, Indiana State Police detectives went to the Marion County Board of Voters Registration to conduct follow up interviews with the directors. Detectives learned that the IVRP had submitted 27,377 voter applications. These applications were submitted by Holly Burke and another unknown male named Karim (employees of the IVRP). Director Cindy Mowery became suspicious of the group and sent an attorney to the IVRP office headquarters located at 2425 N. Meridian Street Indianapolis, Indiana. After observing the location, the attorney expressed concern about the legitimacy of the organization and conveyed those concerns to Director Mowery. While detectives were speaking with the directors, personnel informed the detectives that Holly Burke was currently dropping off voter registration applications. F/Sgt. William Vann and I conducted an investigative interview with Burke at the clerk's office.

The following information was learned through the interview: Burke conveyed that she was a community organizer with the Indiana Voter Registration Project (IVRP), a non-partisan voter registration drive. Burke stated that she receives her paychecks from a company identified as I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Jeffrey C. Hearon

Block by Block. Burke stated the group targeted areas that were historically under represented or disenfranchised in order to encourage people to register to vote.

This was achieved by hiring part time employees to target the identified areas and attempt to register people to vote. These employees would be paid \$50.00 per five hour shift. That same day, detectives traveled to the IVRP office at 2425 N. Meridian Street Indianapolis, IN. Upon arrival, detectives observed that the business did not have any signs on the door to signify an office for IVRP. A sign placed on the door instructed patrons to enter through the rear alley door. Detectives proceeded to the rear entry and noted minimal furnishings, which consisted of folding tables and chairs. Detectives met with IVRP supervisor Ryan Garner. Garner provided additional details of IVRP. Garner stated that the IVRP maintains offices in Indianapolis and Gary Indiana. Detectives later confirmed the alleged office location in Gary was actually a vacant lot. Garner stated that IVRP worked for an organization called Rebuild USA, as well as a group of Washington DC based attorneys. Garner declined to provide additional details, such as, who his supervisors were, if they were a registered political action committee or a not-for-profit organization registered with the State of Indiana. When detectives questioned Garner about the concerns of the registration applications, Garner responded by saying that IVRP attempts to verify the accuracy of the information, but IVRP is limited on the ability to fully vet them due to the deadline for submission.

Upon reviewing several suspected voter registration applications from the IVRP and determining several contained missing, erroneous or fraudulent information, detectives met with personnel from the Indiana Secretary of State's Office to relay the concerns. As a result, Secretary Connie Lawson distributed a public service announcement for the general public to verify their voter registration records, as well as a second letter directing all clerk's offices in the State of Indiana to carefully review applications received by the IVRP. As detectives began to conduct follow

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Jeffrey C. Hearon

up investigation into the questionable voter registration applications, detectives learned the following information:

\*Employees of IVRP were pressured to obtain 10 applications (quota) per shift, or risk termination.

\*Employees of IVRP were advised by IVRP supervisors to get their quota by any means necessary.

\*Employees of IVRP would duplicate information from actual voter registration files onto new applications to meet quota.

\*Employees of IVRP would commonly not sign the applications and provide those applications to other employees who may not have obtained their quota of applications during their shifts.

Furthermore, I applied for a search warrant for the offices of the IVRP on October 3, 2016. On October 4, 2016, detectives with the Indiana State Police executed a search warrant on the IVRP offices. During the course of the search warrant and subsequent review of information, detectives found evidence of 34,000 voter registration applications encompassing 56 Indiana counties. Furthermore, many of the applications had notations on them that the submitted applications were for juveniles, not United States citizens, people who lived out of state, incorrect telephone numbers, incorrect zip codes, invalid or non-existent addresses, notations that real voters denied making application when contacted and notations for multiple registrations. Additionally, detectives recovered multiple voter registration applications that had not been submitted, which is in violation of IC 3-14-2-16. Holiday Burke, Verification Director from the IVRP, was informed of this violation, and that an affidavit would need to be submitted and tendered to the respective clerk's office for each application that was incomplete or suspected of being fraudulent or forged.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Jeffrey C. Hearon

As a result of these findings, Indiana State Police Detectives initiated an investigation into the veracity of numerous voter registration applications that contained missing, incomplete, and/or erroneous applicant information and other problems as noted in the aforementioned investigation. The following facts are the results of Affiant's investigation:

I obtained approximately seven suspected fraudulent voter registration applications forms from the Marion County Board of Voter Registration Office which were certified by Makayla Colbert. Upon receiving them, I began to conduct follow up investigation to determine the legitimacy of each of the applications. I then determined through investigative means that one of the applications had been forged, five appeared fictitious and one was legitimate.

The first application I reviewed was from Jimmy F. Laws Junior. The top portion of the application listed his name as "Jimmy Laws DOB XX/XX/XXXX XXXXXXXXXXXX Brownsburg, Indiana" but the signature was for a "Jimmy Lewis". The application was certified by a Makayla Colbert an employee of the Indiana Voter Registration Project. I compared the suspect application to an on file voter registration and BMV record for Jimmy F. Laws DOB XX/XX/XXXX and noticed that the signatures did not match and the DOB was off by one day. I contacted Mr. Laws and he advised that he did not reregister to vote on July 20, 2016 and did not give anyone permission to register him to vote. Mr. Laws reviewed the document and advised it was not his current address, his handwriting or his signature. He further advised that he did not know a Makayla Colbert.

I then reviewed the below mentioned voter registration applications certified and submitted by Makayla Colbert. A checked was conducted through the Indiana Bureau of Motor Vehicles, Nationwide credit check, criminal history, utilities, social security and bankruptcy court. Additionally I attempted to locate the address on the application. If a phone number was I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Jeffrey C. Hearon

included on the application, that number was called. The following names and information are from each of the five voter registrations that were unverifiable and appeared to be fictitious.

1. David R. Lewis

XXXXXXXXXXXX

Indianapolis, Indiana

DOB XX/XX/XXXX

2. Johnny G. Cole

XXXXXXXXXXXX

Indianapolis, Indiana XXXXX

DOB XX/XX/XXXX

3. William A. Allen

XXXXXXXXXXXX

Indianapolis, Indiana XXXXX

4. Stan M. Bowl Jr.

10163 6011 (street name omitted)

Indianapolis, Indiana XXXXX

DOB XX/XX/XXXX

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Jeffrey C. Hearon

5. Tony B. Cole

XXXXXXXXXXXX

Indianapolis, Indiana XXXXX

DOB XX/XX/XXXX

On November 18, 2016 at approximately 1110 hours I conducted a recorded telephone interview of Makayla Colbert regarding her employment with the Indiana Voter Registration Project. She advised she worked several shifts and was paid \$75 per shift. She advised that she was original told she would need to register approximately 20 people or more per shift. She explained that when she first began working for the IVRP on one or two occasions she did not have enough people registered and a fellow worker would give her a completed voter registration application and she would complete the certification portion of the application and submitted it as if she had registered the person herself. Colbert explained that this only occurred once or twice during her employment with IVRP. Ms. Colbert was asked if she remembered the Jimmy Laws' voter registration and she advised she did not remember any specific applications.

Copies of the believed fictitious applications were emailed to Makayla Colbert for review but she declined to answer the emails or return further calls.

The final voter registration application I reviewed that was certified and submitted by Makayla Colbert was for Leroy Atterberry DOB XX/XX/XXXX. A review indicated he is a real person and the application should be considered valid.

Whomever accepts custody of a completed voter application form from a prospective voter is required to sign a “certified statement of acceptance” before filing the application with a county voter registration office. The certified statement of acceptance states that the signer affirms I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Jeffrey C. Hearon

“under the penalties for perjury that I accepted custody of this completed application from the applicant.”

Based on the follow up investigation into each of these questionable applications, it is my belief that Makayla Colbert knowing or intentionally made or uttered a written instrument (voter registration forms) in such a manner that were purported to have been made by another person, at another time, with different provisions or by authority of one who did not give authority IC 35-43-5-2. Moreover, Makayla Colbert subscribed the name of another person to an affidavit of registration that contains false information IC 3-14-2-3 and knowingly submitted voter registration applications known by Makayla Colbert to be materially false, fictitious or fraudulent IC 3-14-3-1.1. Lastly, Makayla Colbert made a false, material statement under oath or affirmation knowing the statements to be false or not believing it to be true as noted in the Certified Statement of Acceptance on the application form IC 35-44.1-2-1 and submitted them as accurate and correct for processing.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017



STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION

Cause No: 49

STATE OF INDIANA )  
 )  
 vs. )  
 )

**INFORMATION**  
**COUNT I**  
**PROCURING OR SUBMISSION OF**  
**FALSE, FICTITIOUS, OR FRAUDULENT**  
**VOTER REGISTRATION APPLICATION**  
**I.C. 3-14-3-1.1(1)**  
**A LEVEL 6 FELONY**  
**COUNT II**  
**PERJURY**  
**I.C. 35-44.1-2-1(a)(1)**  
**A LEVEL 6 FELONY**

Valerie Franklin  
B/Female  
DOB 10/29/1969

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

On or about between May 1, 2016 and November 8, 2016, Valerie Jo Franklin did knowingly procure or submit voter registration applications known by Valerie Jo Franklin to be materially false, fictitious or fraudulent;

COUNT II

On or about between May 1, 2016 and November 8, 2016, Valerie Jo Franklin did make a false, material statement under oath or affirmation, to-wit: that she accepted custody of a completed voter registration application from an applicant; knowing said statement to be false;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44.1-2-1 that the foregoing representations are true.

/s/ Jeremy Teipen  
Affiant

June 9, 2017  
Date

State's Witnesses:  
Jeffrey C. Hearon 5201 ISP

**TERRY R. CURRY**  
Marion County Prosecutor  
19th Judicial Circuit

Nick Alspach 8082 ISP  
Matt Lawrence 6464 ISP  
Jerry Gentry 6168 ISP  
William Vann 5220 ISP  
Leonard Langland 6352 ISP  
Amy S. Gaul 5934 ISP  
Jeremy C. Franklin 7554 ISP  
Scott R. Jarvis 6784 ISP  
David R. Preston 6065 ISP  
Cindy Mowery  
Ladonna Freeman  
Debra Gazvoda  
Mary Prewitt  
Michelle Cash  
Robert Hartley  
Amber N. Codozor  
Michael Thompson

/s/ Jeremy Teipen  
Deputy Prosecuting Attorney

# AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Lt. Jeffrey C. Hearon swears (affirms) that:

Information set forth below in this Probable Cause Affidavit is either personally known to Affiant, information obtained from other law enforcement sources, information obtained from public records and/or information from sources otherwise identified in this Affidavit. The facts developed from this investigation are as follows and are not inclusive of all information gathered and developed as a result of this ongoing investigation:

On or about August 23, 2016, the Hendricks County Clerk, Ms. Debbie Hoskins, contacted me and reported that during June, July, and August of 2016, a significant number of voter registration applications were received by her office from The Marion County Board of Voters Registration Office. The voter registration applications were submitted to their office by a voter registration drive organization called "The Indiana Voter Registration Project", hereafter referred to as IVRP. Upon reviewing and vetting the applications, The Hendricks County Clerk's Office noted many inconsistencies with the submitted applications and was concerned some may be forged or fraudulent. Furthermore, Ms. Hoskins advised many of the applicants were already registered to vote so the on-file registrations were compared to the newly submitted applications. The newly submitted applications had the following characteristics: very sloppy penmanship, missing information, and/or contained erroneous data, such as, but not limited to the following: Applicants' printed name not matching applicants' signature, missing applicant telephone number and applicant address not matching applicant county of residence.

After learning this information, I scheduled a meeting with Indiana Secretary of State Connie Lawson to discuss these concerns and inquire about the Indiana Voter Registration Project

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Jeffrey C. Hearon

(IVRP), and if they were a registered entity. Secretary Lawson and her staff were unaware of this organization and had not received any complaints.

During the subsequent Indiana State Police investigation on September 2, 2016, I spoke with Ms. Cindy Mowery and Ms. Ladonna Freeman, Co-Directors of the Marion County Board of Voters Registration. They reported that their office had received thousands of voter registration applications from "The Indiana Voter Registration Project (IVRP)." According to Ms. Mowery and Ms. Freeman, several of the voter registration applications were incomplete, and when compared to on-file voter registrations for the same applicants, their signatures did not match. This is consistent with the original findings by the Hendricks County Clerk's Office.

On September 6, 2016, Indiana State Police detectives went to the Marion County Board of Voters Registration to conduct follow up interviews with the directors. Detectives learned that the IVRP had submitted 27,377 voter applications. These applications were submitted by Holly Burke and another unknown male named Karim (employees of the IVRP). Director Cindy Mowery became suspicious of the group and sent an attorney to the IVRP office headquarters located at 2425 N. Meridian Street Indianapolis, Indiana. After observing the location, the attorney expressed concern about the legitimacy of the organization and conveyed those concerns to Director Mowery. While detectives were speaking with the directors, personnel informed the detectives that Holly Burke was currently dropping off voter registration applications. F/Sgt. William Vann and I conducted an investigative interview with Burke at the clerk's office.

The following information was learned through the interview: Burke conveyed that she was a community organizer with the Indiana Voter Registration Project (IVRP), a non-partisan voter registration drive. Burke stated that she receives her paychecks from a company identified as I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Jeffrey C. Hearon

Block by Block. Burke stated the group targeted areas that were historically under represented or disenfranchised in order to encourage people to register to vote.

This was achieved by hiring part time employees to target the identified areas and attempt to register people to vote. These employees would be paid \$50.00 per five hour shift. That same day, detectives traveled to the IVRP office at 2425 N. Meridian Street Indianapolis, IN. Upon arrival, detectives observed that the business did not have any signs on the door to signify an office for IVRP. A sign placed on the door instructed patrons to enter through the rear alley door. Detectives proceeded to the rear entry and noted minimal furnishings, which consisted of folding tables and chairs. Detectives met with IVRP supervisor Ryan Garner. Garner provided additional details of IVRP. Garner stated that the IVRP maintains offices in Indianapolis and Gary Indiana. Detectives later confirmed the alleged office location in Gary was actually a vacant lot. Garner stated that IVRP worked for an organization called Rebuild USA, as well as a group of Washington DC based attorneys. Garner declined to provide additional details, such as, who his supervisors were, if they were a registered political action committee or a not-for-profit organization registered with the State of Indiana. When detectives questioned Garner about the concerns of the registration applications, Garner responded by saying that IVRP attempts to verify the accuracy of the information, but IVRP is limited on the ability to fully vet them due to the deadline for submission.

Upon reviewing several suspected voter registration applications from the IVRP and determining several contained missing, erroneous or fraudulent information, detectives met with personnel from the Indiana Secretary of State's Office to relay the concerns. As a result, Secretary Connie Lawson distributed a public service announcement for the general public to verify their voter registration records, as well as a second letter directing all clerk's offices in the State of Indiana to carefully review applications received by the IVRP. As detectives began to conduct follow

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Jeffrey C. Hearon

up investigation into the questionable voter registration applications, detectives learned the following information:

\*Employees of IVRP were pressured to obtain 10 applications (quota) per shift, or risk termination.

\*Employees of IVRP were advised by IVRP supervisors to get their quota by any means necessary.

\*Employees of IVRP would duplicate information from actual voter registration files onto new applications to meet quota.

\*Employees of IVRP would commonly not sign the applications and provide those applications to other employees who may not have obtained their quota of applications during their shifts.

Furthermore, I applied for a search warrant for the offices of the IVRP on October 3, 2016. On October 4, 2016, detectives with the Indiana State Police executed a search warrant on the IVRP offices. During the course of the search warrant and subsequent review of information, detectives found evidence of 34,000 voter registration applications encompassing 56 Indiana counties. Furthermore, many of the applications had notations on them that the submitted applications were for juveniles, not United States citizens, people who lived out of state, incorrect telephone numbers, incorrect zip codes, invalid or non-existent addresses, notations that real voters denied making application when contacted and notations for multiple registrations. Additionally, detectives recovered multiple voter registration applications that had not been submitted, which is in violation of IC 3-14-2-16. Holiday Burke, Verification Director from the IVRP, was informed of this violation, and that an affidavit would need to be submitted and tendered to the respective clerk's office for each application that was incomplete or suspected of being fraudulent or forged.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Jeffrey C. Hearon

As a result of these findings, Indiana State Police Detectives initiated an investigation into the veracity of numerous voter registration applications that contained missing, incomplete, and/or erroneous applicant information and other problems as noted in the aforementioned investigation. The following facts are the results of Affiant's investigation:

I obtained approximately eight suspected fraudulent voter registration applications forms from the Marion County Board of Voter Registration Office which were certified by Valerie Franklin. Upon receiving them, I began to conduct follow up investigation to determine the legitimacy of each of the applications. I then determined through investigative means and an admission from Valerie Franklin that three of the applications were fraudulent.

The first application I reviewed was from Robert Hartley. The top portion of the application listed his name as "Robert Hartley DOB XX/XX/XXXX, XXXXXXXXXXXXXIndianapolis, Indiana XXXXX". I compared the suspect application to an on file voter registration for Robert L. Hartley DOB XX/XX/XXXX who has a business at XXXXXXXXXXXXX Indianapolis and noticed that the signatures did not match and the DOB was different. I then contacted Mr. Hartley and he advised that he did not reregister to vote on June 6, 2016 and did not give anyone permission to register him to vote. He further advised that he did not know a Valerie Franklin.

The second application I reviewed was from a Mike Thompson. Mr. Thompson had called the Indiana Secretary of State's Office to complain that he was a victim of voter registration fraud. The top portion of the application listed his name as "Michael Thompson with no date of birth, XXXXXXXXXXXXX Indianapolis, Indiana XXXXX". I compared the suspect application to an on file voter registration for Michael Thompson DOB XX/XX/XXXX, XXXXXXXXXXXXX Indianapolis and noticed that the signatures did not match. I then contacted Mr. Thompson and

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Jeffrey C. Hearon

he advised that he did not reregister to vote on June 18, 2016 and did not give anyone permission to register him to vote. He further advised that he did not know a Valerie Franklin.

The third application I reviewed was for an Amber Codozor DOB XX/XX/XXXX, XXXXXXXXXXXXX Indianapolis, Indiana 46219. The application was allegedly completed on June 11, 2016. I travelled to XXXXXXXXXXXXX and verified that Amber Codozor rented an apartment at that address. I spoke to Ms. Cordoza and she advised that she had registered on-line and her real date of birth was XX/XX/XXXX. Ms Codozor was shown a copy of the application certified by Valerie Franklin and advised that it was not her handwriting, signature or date of birth on the application. She also advised that she did not know Valerie Franklin or give anyone permission to register her to vote.

I obtained a copy of Valerie Franklin's signature from the Indiana Bureau of Motor Vehicles and compared it to all eight signatures on the voter registration applications submitted by Valerie Franklin and it appeared to be similar.

For each the below mentioned voter registration applications a checked was conducted through the Indiana Bureau of Motor Vehicles, Nationwide credit check, criminal history, utilities, social security and bankruptcy court. Additionally I attempted to locate the address on the application. If a phone number was included on the application, that number was called. The following names and information are from each of the three voter registrations that were unverifiable and appeared to be fictitious.

1. Antwan Jones

XXXXXXXXXXXX

Indianapolis, Indiana XXXXX

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017



**Affidavit for Probable Cause**

**From:** Jeffrey C. Hearon

DOB XX/XX/XXXX

2. Colleen Ann Martin

XXXXXXXXXXXX

Indianapolis, Indiana XXXXX

DOB XX/XX/XXXX

3. Jimmy Lee Beech

DOB XX/XX/XXXX

XXXXXXXXXXXX

I interviewed Valerie Franklin at her residence XXXXXXXXXXXXX Indianapolis, Indiana. Franklin advised that she was employed at The Indiana Voter Registration Project during May and June 2016. She advised that there was a quota of 10 registrations per shift or the employee would not be allowed to work again. She advised that she observed several employees not completing the certified statement of acceptance and giving completed voter registration applications to other workers who had not reached their quota for the day. According to Franklin, she witnesses several employees completing voter registration applications by copying from a list of registered voters given to them by the supervisors. Franklin admitted that she created several fictions voter registration applications from names provided by co-workers.

Valerie Franklin was shown copies of three registrations for Mike Thompson, Robert Hartley and Amber Cordozor that she submitted on June 6, 2016, June 11, 2016 and June 18, 2016. It was explained that Thompson, Hartley and Cordozor denied registering to vote on the above dates. She admitted forging several names and information but could not remember specific people or applications.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017\_\_\_\_\_

## Affidavit for Probable Cause

**From:** Jeffrey C. Hearon

Whomever accepts custody of a completed voter application form from a prospective voter is required to sign a “certified statement of acceptance” before filing the application with a county voter registration office. The certified statement of acceptance states that the signer affirms “under the penalties for perjury that I accepted custody of this completed application from the applicant.”

Based on the follow up investigation into each of these questionable applications, it is my belief that Valerie Franklin knowing or intentionally made or uttered a written instrument (voter registration forms) in such a manner that were purported to have been made by another person, at another time, with different provisions or by authority of one who did not give authority IC 35-43-5-2. Moreover, Valerie Franklin subscribed the name of another person to an affidavit of registration that contains false information IC 3-14-2-3 and knowingly submitted voter registration applications known by Valerie Franklin to be materially false, fictitious or fraudulent IC 3-14-3-1.1. Lastly, Valerie Franklin made a false, material statement under oath or affirmation knowing the statements to be false or not believing it to be true as noted in the Certified Statement of Acceptance on the application form IC 35-44.1-2-1 and submitted them as accurate and correct for processing.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017\_\_\_\_\_

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION

Cause No: 49

STATE OF INDIANA )  
 )  
 vs. )  
 )

INFORMATION  
COUNT I  
PROCURING OR SUBMISSION OF  
FALSE, FICTITIOUS, OR FRAUDULENT  
VOTER REGISTRATION APPLICATION  
I.C. 3-14-3-1.1(1)  
A LEVEL 6 FELONY  
COUNT II  
PERJURY  
I.C. 35-44.1-2-1(a)(1)  
A LEVEL 6 FELONY

KYLEE GARRETT  
B/Female  
DOB 2/2/1981

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

On or about between May 1, 2016 and November 8, 2016, KYLEE GARRETT did knowingly procure or submit voter registration applications known by KYLEE GARRETT to be materially false, fictitious or fraudulent;

COUNT II

On or about between May 1, 2016 and November 8, 2016, KYLEE GARRETT did make a false, material statement under oath or affirmation, to-wit: that she accepted custody of a completed voter registration application from an applicant; knowing said statement to be false;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44.1-2-1 that the foregoing representations are true.

/s/ Jeremy Teipen  
Affiant

June 9, 2017  
Date

**TERRY R. CURRY**  
Marion County Prosecutor  
19th Judicial Circuit

State's Witnesses:  
Jeffrey C. Hearon 5201 ISP

Nicholas Alspach 8082 ISP  
Matt Lawrence 6464 ISP  
Jerry Gentry 6168 ISP  
William Vann 5220 ISP  
Leonard Langland 6352 ISP  
Amy S. Gaul 5934 ISP  
Jeremy C. Franklin 7554 ISP  
Scott R. Jarvis 6784 ISP  
David R. Preston 6065 ISP  
Cindy Mowery  
Ladonna Freeman  
Debra Gazvoda  
Mary Prewitt  
Michelle Cash  
Pamela McCreary  
Cesar Cepeda  
Tory Simmons

/s/ Jeremy Teipen  
Deputy Prosecuting Attorney

# AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Nicholas Alspach swears (affirms) that:

Information set forth below in this Probable Cause Affidavit is either personally known to Affiant, information obtained from other law enforcement sources, information obtained from public records and/or information from sources otherwise identified in this Affidavit. The facts developed from this investigation are as follows and are not inclusive of all information gathered and developed as a result of this ongoing investigation:

On or about August 23, 2016, the Hendricks County Clerk, Ms. Debbie Hoskins, reported to Lieutenant Jeff Hearon of the Indiana State Police Department that during June, July, and August of 2016, a significant number of voter registration applications were received by her office from The Marion County Board of Voters Registration Office. The voter registration applications were submitted to their office by a voter registration drive organization called "The Indiana Voter Registration Project" hereafter referred to as IVRP. Upon reviewing and vetting the applications, The Hendricks County Clerk's Office noted many inconsistencies with the submitted applications and was concerned some may be forged or fraudulent. Furthermore, Ms. Hoskins advised many of the applicants were already registered to vote so the on-file registrations were compared to the newly submitted applications. The newly submitted applications had the following characteristics: very sloppy penmanship, missing information, and/or contained erroneous data, such as, but not limited to the following: Applicants' printed name not matching applicants' signature, missing applicant telephone number and applicant address not matching applicant county of residence.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Nicholas Alspach

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Nicholas Alspach

After learning this information, Lt. Hearon scheduled a meeting with Indiana Secretary of State Connie Lawson to discuss these concerns and inquire about the Indiana Voter Registration Project (IVRP) and if they were a registered entity. Secretary Lawson and her staff were unaware of this organization and had not received any complaints.

During the subsequent Indiana State Police investigation on September 2, 2016, Lt. Jeff Hearon spoke with Ms. Cindy Mowery and Ms. Ladonna Freeman, Co-Directors of the Marion County Board of Voters Registration. They reported that their office has received thousands of voter registration applications from "The Indiana Voter Registration Project (IVRP)." According to the Ms. Mowery and Ms. Freeman, several of the voter registration applications were incomplete and when compared to on-file voter registrations for the same applicant's their signatures did not match. This is consistent with the original findings by the Hendricks County Clerk's Office.

On September 6, 2016, Indiana State Police detectives went to the Marion County Board of Voters Registration to conduct follow up interviews with the directors. Detectives learned that the IVRP had submitted 27,377 voter applications. These applications were submitted by Holly Burke and another unknown male named Karim (employees of the IVRP). Director Cindy Mowery became suspicious of the group and sent an attorney to the IVRP office headquarters located at 2425 N. Meridian Street Indianapolis, Indiana. After observing the location, the attorney expressed concern about the legitimacy of the organization and conveyed those concerns to the Director Mowery. While detectives were speaking with the directors, personnel informed the detectives that Holly Burke was currently dropping off voter registration applications. Lt. Hearon and F/Sgt. William Vann conducted an investigative interview with Burke at the clerk's office. The following information was learned through the interview: Burke conveyed that she was a community organizer with the Indiana Voter Registration Project

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Nicholas O. Alspach

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Nicholas Alspach

(IVRP), a non-partisan voter registration drive. Burke stated that she receives her paychecks from a company identified as Block by Block. Burke stated the group targeted areas that were historically under represented or disenfranchised in order to encourage people to register to vote. This was achieved by hiring part time employees to target the identified areas and attempt to register people to vote. These employees would be paid \$50.00 per five hour shift. That same day, detectives traveled to the IVRP office at 2425 N. Meridian Street Indianapolis, IN. Upon arrival, detectives observed that the business did not have any signs on the door to signify an office for IVRP. A sign placed on the door instructed patrons to enter through the rear alley door. Detectives proceeded to the rear entry and noted minimal furnishings which consisted of folding tables and chairs. Detectives met with IVRP supervisor Ryan Garner. Garner provided additional details of IVRP. Garner stated that the IVRP maintains offices in Indianapolis and Gary Indiana. Detectives later confirmed the alleged office location in Gary was actually a vacant lot. Garner stated that IVRP worked for an organization called Rebuild USA, as well as a group of Washington DC based attorneys. Garner declined to provide additional details, such as, who his supervisors were, if they were a registered political action committee or a not-for-profit organization registered with the State of Indiana. When detectives questioned Garner about the concerns of the registration applications, Garner responded by saying that IVRP attempts to verify the accuracy of the information, but IVRP is limited on the ability to fully vet them due to the deadline for submission.

Upon reviewing several suspected voter registration applications from the IVRP and determining several contained missing, erroneous or fraudulent information, detectives met with personnel from the Indiana Secretary of State's Office to relay the concerns. As a result, Secretary Connie Lawson distributed a public service announcement for the general public to verify their voter registration records as well as a second letter directing all clerk's offices in the State of Indiana to carefully review applications received by the IVRP. As detectives began to conduct follow up I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Nicholas O. Alspach

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Nicholas Alspach

investigation into the questionable voter registration applications, detectives learned the following information:

- \*Employees of IVRP were pressured to obtain 10 applications (quota) per shift or risk termination.
- \*Employees of IVRP were advised by IVRP supervisors to get their quota by any means necessary.
- \*Employees of IVRP would duplicate information from actual voter registration files onto new applications to meet quota.
- \*Employees of IVRP would commonly not sign the applications and provide those applications to other employees who may not have obtained their quota of applications during their shifts.

Furthermore, Lt. Jeff Hearon applied for a search warrant for the offices of the IVRP on October 3, 2016. On October 4, 2016, detectives with the Indiana State Police executed a search warrant on the IVRP offices. During the course of the search warrant and subsequent review of information, detectives found evidence of 34,000 voter registration applications encompassing 56 Indiana counties. Furthermore, many of the applications had notations on them that the submitted applications were for juveniles, not United States citizens, people who lived out of state, incorrect telephone numbers, incorrect zip codes, invalid or non-existent addresses, notations that real voters denied making application when contacted and notations for multiple registrations. Additionally, detectives recovered multiple voter registration applications that had not been submitted, which is in violation of IC 3-7-32-8. Holiday Burke, Verification Director from the IVRP, was informed of this violation and that an affidavit would need to be submitted and tendered to the respective clerk's office for each application that was incomplete or suspected of being fraudulent or forged.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Nicholas O. Alspach

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AFFIANT

DATED: 6/9/2017



## Affidavit for Probable Cause

**From:** Nicholas Alspach

As a result of these findings, Indiana State Police Detectives initiated an investigation into the veracity of numerous voter registration applications that contained missing, incomplete, and/or erroneous applicant information and other problems as noted in the aforementioned investigation. The following facts are the results of Affiant's investigation:

On Sunday, September 18, 2016, I, Detective Nicholas Alspach of the Indiana State Police, met with LT Jeff Hearon at the District 52 ISP Post and obtained a potential fraudulent voter registration form to investigate. The IVRP canvasser who signed off on the form under block 15 (which indicates the signee "affirms under the penalties of perjury that I accepted custody of this completed application from the applicant...IC 35-44.1-2-1") was a female by the name of Kylee Garrett (02/02/81). In the course of my investigation that day, I was able to contact the man on the voter registration form and confirm with him that he did not create the form. The victim in question, Tory Simmons, stated that he had always been registered to vote and that he did not fill out a form with any canvasser or representative of IVRP on 07/31/16 (the date the form shows to have been completed). I asked Simmons if he knew anyone by the name of Kylee Garrett, who reportedly oversaw the creation of his questionable registration form. Simmons advised me that he was not familiar with anyone by that name. Simmons stated that he had been registered to vote for many years and votes in a building across the street from his residence. After obtaining confirmation that the form was not completed by him, I asked Simmons if the signature on the form was his. Simmons told me that any signature depicting his name found on the voter registration form that I had in my possession would have been forged by someone unbeknownst to him.

After speaking with Simmons, I attempted to make contact with Kylee Garrett that same day at her residence and via telephone. I was unable to reach Kylee Garrett until days later when I was able to obtain a working telephone number from her mother. After making phone contact with I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Nicholas O. Alspach

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Nicholas Alspach

Garrett, we agreed to meet at her place of work in order to speak about the IVRP and the voter registration form of Simmons. Garrett confirmed to me that she did work for the IVRP as a canvasser and had approached people on the street and helped those unregistered to vote become registered. Garrett claimed that she had no idea how a registration form could have been fraudulently created using Simmons' information. Garrett also initially denied having any knowledge of IVRP canvassers (to include herself) having forged any voter registration forms at any time in the past.

Through the course of the investigation, ISP detectives were provided with hundreds of additional suspicious voter registration forms from the Marion County Clerk's Office. Within those forms, I located an additional 10 voter registration forms that had been certified by Garrett while she was employed with the IVRP as a canvasser. I began attempts to contact the persons shown on the forms to ascertain whether they completed the registration form or not. Numerous attempts to locate the subjects at the addresses listed on their respective forms proved futile. Most of the subjects' residential addresses listed on their registration forms were ultimately found to be industrial parks, warehouses, or simply vacant lots. Attempts to verify the identities via online sources, driver's license checks, and all means available to law enforcement proved unsuccessful. Some persons on the voter registration forms appeared to be from outside the state of Indiana, and six of the persons could not be corroborated at all as being legitimate.

On November 16, 2016 I located Garrett at her work location in Lebanon, IN and spoke with her again. Garrett volunteered to speak with me about the 10 new forms that I have been investigating. During the interview, Garrett admitted that she created fraudulent voter registration forms using fictitious identities that she "made up" out of thin air in violation of IC 3-14-3-1.1 and IC 3-14-2-3. I showed Garrett the 10 voter registration forms I had recently

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Nicholas O. Alspach

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Nicholas Alspach

investigated, and she pointed out six of them which she confessed to creating herself. The six fraudulent forms that Garrett confessed to creating herself are as follows:

1) Samuel Clark

XXXXXXXXXXXX, Indianapolis, IN

(XXX) XXX-XXXX

A check of the address listed yielded no residence. The phone number was also inaccurate.

Checks on

whitepages.com and other sources could not corroborate this identity.

2) Corey M. Young, Sr.

XXXXXXXXXXXX, Indianapolis, IN

(XXX) XXX-XXXX

Bad street address listed on the form, non-working phone number as well. Checks on whitepages.com and

other sources could not corroborate this identity in Indiana. Only possible match was for a male in Ohio.

3) Lynetta Uriri

XXXXXXXXXXXX, Indianapolis, IN

(XXX) XXX-XXXX

No such person could be corroborated or found to exist. Multiple attempts to locate this person

using whitepages.com, and any other available means were unsuccessful. All checks at the address and phone

number listed proved incorrect

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Nicholas O. Alspach

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017\_\_\_\_\_

**Affidavit for Probable Cause**

**From:** Nicholas Alspach

4) Paul C. Stevenson

XXXXXXXXXXXX, Indianapolis, IN

(XXX) XXX-XXXX

Address listed on the form was fraudulent and could not be found. Phone number was incorrect. All checks and

attempts to locate or corroborate this identify failed. No trace of this person existing.

5) Kim Price

XXXXXXXXXXXX, Indianapolis, IN

(XXX) XXX-XXXX

Address listed on the form was fraudulent and could not be found. Phone number was incorrect. All checks and

attempts to locate or corroborate this identify failed. No trace of this person existing.

6) Tyree William Hill

XXXXXXXXXXXX, Indianapolis, IN

(XXX) XXX-XXXX

Address not found and phone number provided was inaccurate. All checks and attempts to locate or corroborate

this identify failed. No trace of this person existing.

Garrett also confessed that she and other IVRP canvassers often shared voter registration forms and that she accepted forms that were completed by others and certified by other IVRP canvassers. Garrett told me that this practice was common and helped those that had low numbers on certain days. Garrett stated that if a canvasser (herself or another) only produced a I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Nicholas O. Alspach

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Nicholas Alspach

few registration forms on a given day, that another canvasser might provide them with some of their forms with the certification section (block 15) not filled out so that they could complete it and pass it off as their own work. Garrett admitted that she created fictitious voter registration forms on days when she had low numbers, and also participated in the practice of sharing partially completed forms with others (signing her name under penalty of perjury that she had accepted the form from the person who reportedly had filled it out). This is contrary to the above referenced Indiana Code and occurred in Marion County Indiana.

Whomever accepts custody of a completed voter application form from a prospective voter is required to sign a “certified statement of acceptance” before filing the application with a county voter registration office. The certified statement of acceptance states that the signer affirms “under the penalties for perjury that I accepted custody of this completed application from the applicant.”

Based on this information, Garrett submitted numerous applications known by her to be materially false, fictitious or fraudulent in violation of IC 3-14-3-1.1. Furthermore, Garrett clearly subscribed the name of another person to the affidavit for registration without writing on it the person's own name and address as an attesting witness in violation of IC 3-14-2-3. Lastly, Garrett made a false, material statement under oath or affirmation knowing the statements to be false or not believing it to be true as noted in the Certified Statement of Acceptance on the application form IC 35-44.1-2-1 and submitted them as accurate and correct for processing.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Nicholas O. Alspach

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AFFIANT

DATED: 6/9/2017

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION

Cause No: 49

STATE OF INDIANA )  
 )  
 vs. )  
 )

**INFORMATION**  
**COUNT I**  
**PROCURING OR SUBMISSION OF**  
**FALSE, FICTITIOUS, OR FRAUDULENT**  
**VOTER REGISTRATION APPLICATION**  
**I.C. 3-14-3-1.1(1)**  
**A LEVEL 6 FELONY**  
**COUNT II**  
**PERJURY**  
**I.C. 35-44.1-2-1(a)(1)**  
**A LEVEL 6 FELONY**

**TIARA S KURTZ**  
**B/Female**  
**DOB 7/18/1991**

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

On or about between May 1, 2016 and November 8, 2016, TIARA S KURTZ did knowingly procure or submit voter registration applications known by TIARA S KURTZ to be materially false, fictitious or fraudulent;

COUNT II

On or about between May 1, 2016 and November 8, 2016, TIARA S KURTZ did make a false, material statement under oath or affirmation, to-wit: that she accepted custody of a completed voter registration application from an applicant; knowing said statement to be false;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44.1-2-1 that the foregoing representations are true.

/s/ Jeremy Teipen  
Affiant

June 9, 2017  
Date

**TERRY R. CURRY**  
Marion County Prosecutor  
19th Judicial Circuit

State's Witnesses:  
Jeffrey C. Hearon 5201 ISP

Nicholas Aspach 8086 ISP  
Matt Lawrence 6464 ISP  
Jerry Gentry 6168 ISP  
William Vann 5220 ISP  
Leonard Langland 6352 ISP  
Amy S. Gaul 5934 ISP  
Jeremy C. Franklin 7554 ISP  
Scott R. Jarvis 6784 ISP  
David R. Preston 6065 ISP  
Cindy Mowery  
Ladonna Freeman  
Debra Gazvoda  
Mary Prewitt  
Michelle Cash  
Pamela McCreary  
Darla Bell  
James E. Jones

/s/ Jeremy Teipen  
Deputy Prosecuting Attorney

# AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Lt. Jeffrey C. Hearon swears (affirms) that:

Information set forth below in this Probable Cause Affidavit is either personally known to Affiant, information obtained from other law enforcement sources, information obtained from public records and/or information from sources otherwise identified in this Affidavit. The facts developed from this investigation are as follows and are not inclusive of all information gathered and developed as a result of this ongoing investigation:

On or about August 23, 2016, the Hendricks County Clerk, Ms. Debbie Hoskins, contacted me and reported that during June, July, and August of 2016, a significant number of voter registration applications were received by her office from The Marion County Board of Voters Registration Office. The voter registration applications were submitted to their office by a voter registration drive organization called "The Indiana Voter Registration Project", hereafter referred to as IVRP. Upon reviewing and vetting the applications, The Hendricks County Clerk's Office noted many inconsistencies with the submitted applications and was concerned some may be forged or fraudulent. Furthermore, Ms. Hoskins advised many of the applicants were already registered to vote so the on-file registrations were compared to the newly submitted applications. The newly submitted applications had the following characteristics: very sloppy penmanship, missing information, and/or contained erroneous data, such as, but not limited to the following: Applicants' printed name not matching applicants' signature, missing applicant telephone number and applicant address not matching applicant county of residence.

After learning this information, I scheduled a meeting with Indiana Secretary of State Connie Lawson to discuss these concerns and inquire about the Indiana Voter Registration Project

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017



## Affidavit for Probable Cause

**From:** Lt. Jeffrey C. Hearon

(IVRP), and if they were a registered entity. Secretary Lawson and her staff were unaware of this organization and had not received any complaints.

During the subsequent Indiana State Police investigation on September 2, 2016, I spoke with Ms. Cindy Mowery and Ms. Ladonna Freeman, Co-Directors of the Marion County Board of Voters Registration. They reported that their office had received thousands of voter registration applications from "The Indiana Voter Registration Project (IVRP)." According to Ms. Mowery and Ms. Freeman, several of the voter registration applications were incomplete, and when compared to on-file voter registrations for the same applicants, their signatures did not match. This is consistent with the original findings by the Hendricks County Clerk's Office.

On September 6, 2016, Indiana State Police detectives went to the Marion County Board of Voters Registration to conduct follow up interviews with the directors. Detectives learned that the IVRP had submitted 27,377 voter applications. These applications were submitted by Holly Burke and another unknown male named Karim (employees of the IVRP). Director Cindy Mowery became suspicious of the group and sent an attorney to the IVRP office headquarters located at 2425 N. Meridian Street Indianapolis, Indiana. After observing the location, the attorney expressed concern about the legitimacy of the organization and conveyed those concerns to Director Mowery. While detectives were speaking with the directors, personnel informed the detectives that Holly Burke was currently dropping off voter registration applications. F/Sgt. William Vann and I conducted an investigative interview with Burke at the clerk's office. The following information was learned through the interview: Burke conveyed that she was a community organizer with the Indiana Voter Registration Project (IVRP), a non-partisan voter registration drive. Burke stated that she receives her paychecks from a company identified as Block by Block. Burke stated the group targeted areas that were historically under represented or disenfranchised in order to encourage people to register to vote.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Lt. Jeffrey C. Hearon

This was achieved by hiring part time employees to target the identified areas and attempt to register people to vote. These employees would be paid \$50.00 per five hour shift. That same day, detectives traveled to the IVRP office at 2425 N. Meridian Street Indianapolis, IN. Upon arrival, detectives observed that the business did not have any signs on the door to signify an office for IVRP. A sign placed on the door instructed patrons to enter through the rear alley door. Detectives proceeded to the rear entry and noted minimal furnishings, which consisted of folding tables and chairs. Detectives met with IVRP supervisor Ryan Garner. Garner provided additional details of IVRP. Garner stated that the IVRP maintains offices in Indianapolis and Gary Indiana. Detectives later confirmed the alleged office location in Gary was actually a vacant lot. Garner stated that IVRP worked for an organization called Rebuild USA, as well as a group of Washington DC based attorneys. Garner declined to provide additional details, such as, who his supervisors were, if they were a registered political action committee or a not-for-profit organization registered with the State of Indiana. When detectives questioned Garner about the concerns of the registration applications, Garner responded by saying that IVRP attempts to verify the accuracy of the information, but IVRP is limited on the ability to fully vet them due to the deadline for submission.

Upon reviewing several suspected voter registration applications from the IVRP and determining several contained missing, erroneous or fraudulent information, detectives met with personnel from the Indiana Secretary of State's Office to relay the concerns. As a result, Secretary Connie Lawson distributed a public service announcement for the general public to verify their voter registration records, as well as a second letter directing all clerk's offices in the State of Indiana to carefully review applications received by the IVRP. As detectives began to conduct follow up investigation into the questionable voter registration applications, detectives learned the following information:

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Lt. Jeffrey C. Hearon

\*Employees of IVRP were pressured to obtain 10 applications (quota) per shift, or risk termination.

\*Employees of IVRP were advised by IVRP supervisors to get their quota by any means necessary.

\*Employees of IVRP would duplicate information from actual voter registration files onto new applications to meet quota.

\*Employees of IVRP would commonly not sign the applications and provide those applications to other employees who may not have obtained their quota of applications during their shifts.

Furthermore, I applied for a search warrant for the offices of the IVRP on October 3, 2016. On October 4, 2016, detectives with the Indiana State Police executed a search warrant on the IVRP offices. During the course of the search warrant and subsequent review of information, detectives found evidence of 34,000 voter registration applications encompassing 56 Indiana counties. Furthermore, many of the applications had notations on them that the submitted applications were for juveniles, not United States citizens, people who lived out of state, incorrect telephone numbers, incorrect zip codes, invalid or non-existent addresses, notations that real voters denied making application when contacted and notations for multiple registrations. Additionally, detectives recovered multiple voter registration applications that had not been submitted, which is in violation of IC 3-14-2-16. Holiday Burke, Verification Director from the IVRP, was informed of this violation, and that an affidavit would need to be submitted and tendered to the respective clerk's office for each application that was incomplete or suspected of being fraudulent or forged.

As a result of these findings, Indiana State Police Detectives initiated an investigation into the veracity of numerous voter registration applications that contained missing, incomplete, and/or I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Lt. Jeffrey C. Hearon

erroneous applicant information and other problems as noted in the aforementioned investigation. The following facts are the results of Affiant's investigation:

On September 14, at approximately 1300 hours, I met with LaDonna Freeman at the Marion County Voter Registration Office and obtained copies of example receipts for voter registration applications for the Indiana Voter Registration Project. Additionally, Ms. Freeman provided me with copies of five voter registrations applications for Allen Singleton, Darla Bell, Dawn Dullen, James Jones and Carol Speed. Tiara Kurtz certified all of the applications. Tiara Kurtz was a former employee of The Indiana Voter Registration Project Organization. A signature comparison of previously submitted voter registrations applications for all five people revealed that the signatures did not appear to match.

The first application I reviewed was from Carol A. Speed. The top portion of the application listed her name as “Carol A. Speed DOB XX/XX/XXXX, XXXXXXXXXXXXXXXX Indianapolis, Indiana”. The application was certified by a Tiara Kurtz. I compared the suspect application to an on file voter registration for Carol A. Speed, DOB XX/XX/XXXX, and noticed that the signatures did not match, and the DOB was off by three years.

The second application I reviewed was for Darla M. Bell, DOB XX/XX/XXXX. The top portion of the application listed her name as “Darla M. Bell DOB XX/XX/XXXX, XXXXXXXXXXXXXXXX Indianapolis, Indiana”. The application was certified by a Tiara Kurtz. I compared the suspect application to an on file voter registration record for Darla M. Bell, and noticed that the signatures did not match, and the DOB was off by one year. I contacted Ms. Bell and she advised that she did not reregister to vote on August 29, 2016, and did not give anyone permission to register her to vote. She further advised that the new application did not use her

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Lt. Jeffrey C. Hearon

correct address. She was advised to go to Marion County Voter Registration and correct her information so she could vote at the correct location and not be disenfranchised.

The third application I reviewed was for Dawn C. Dullen, DOB XX/XX/XXXX. The top portion of the application listed her name as “Dawn C. Dullen DOB XX/XX/XXXX  
XXXXXXXXXXXXXXXX Indianapolis, Indiana”. The application was certified by a Tiara Kurtz. I compared the suspect application to an on file voter registration record for Dawn C. Dullen, and noticed that the signatures did not match.

The fourth application I reviewed was for Allen R. Singleton, DOB XX/XX/XXXX. The top portion of the application listed his name as “Allen R. Singleton DOB XX/XX/XXXX,  
XXXXXXXXXXXXXXXX Indianapolis, Indiana”. The application was certified by a Tiara Kurtz. I compared the suspect application to an on file voter registration record for Allen R. Singleton, and noticed that the signatures did not match, and the addresses were different.

The fifth application I reviewed was for James Earl Jones, DOB XX/XX/XXXX. The top portion of the application listed his name as “James Earl Jones DOB XX/XX/XXXX,  
XXXXXXXXXXXXXXXX Indianapolis, Indiana”. The application was certified by a Tiara Kurtz. I compared the suspect application to an on file voter registration record for James Earl Jones, and noticed that the signatures did not match. I contacted Mr. Jones and he advised that he did not reregister to vote on August 29, 2016, and did not give anyone permission to register him to vote.

On September 26, 2016, at approximately 1030 hours, F/Sgt. Vann and I then travelled to Tiara Kurtz’s residence, XXXXXXXXXXXXXXX, Indianapolis, Indiana and spoke with Kurtz. Kurtz advised that she worked for the Indiana Voter Registration Project as a canvasser and registered people to vote. She advised that there was pressure on the canvassers to register 10 people per  
I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Lt. Jeffrey C. Hearon

shift, and if they failed to reach this number, they would not be allowed to work again. Ms. Kurtz admitted that she completed voter registration applications without the applicants' permission. She admitted to fabricating and signing applications for James E. Jones, Allen R. Singleton, Dawn C. Dullen, Carol A. Speed and Darla M. Bell.

During this investigation, I assigned Detective Jerry Gentry to investigate nineteen voter registrations applications that appeared to be fraudulent. The voter registrations were all certified by Tiara Kurtz. Of the nineteen registrations, fourteen were unable to be verified from the information on the registration and appeared to be fictitious. For each of the below mentioned voter registration applications, a check was conducted through the Indiana Bureau of Motor Vehicles, Nationwide credit check, criminal history, utilities, social security and bankruptcy court. Additionally, Detective Gentry attempted to locate the address listed on each application. If a phone number was included on the application, that number was called. The following names and information are from each of the fourteen voter registrations that appeared to be fraudulent, and were unverifiable.

1. Dale Brackin

XXXXXXXXXXXXXXXX Indianapolis

DOB XX/XX/XXXX

2. Michael Buckner

XXXXXXXXXXXXXXXX Indianapolis

DOB XX/XX/XXXX

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017\_\_\_\_\_

**Affidavit for Probable Cause**

**From:** Lt. Jeffrey C. Hearon

3. Brandon Driver

XXXXXXXXXXXXXXXX Avon

DOB XX/XX/XXXX

4. Ronika Gillespie

XXXXXXXXXXXXXXXX Indianapolis

DOB XX/XX/XXXX

5. Ronell Gillespie

XXXXXXXXXXXXXXXX Indianapolis

DOB XX/XX/XXXX

6. Cristen Jennings

XXXXXXXXXXXXXXXX Indianapolis

DOB XX/XX/XXXX

7. Mark Neil

XXXXXXXXXXXXXXXX Indianapolis

DOB XX/XX/XXXX

8. Everlast Noah

XXXXXXXXXXXXXXXX Indianapolis

DOB XX/XX/XXXX

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017\_\_\_\_\_

**Affidavit for Probable Cause**

**From:** Lt. Jeffrey C. Hearon

9. Christine Pokeajac

XXXXXXXXXXXXXXXXX Indianapolis

DOB XX/XX/XXXX

10. Derrell Preston

XXXXXXXXXXXXXXXXX Indianapolis

DOB XX/XX/XXXX

11. Trey Pruitt

XXXXXXXXXXXXXXXXX Indianapolis

DOB XX/XX/XXXX

12. Rachel Ughulu

XXXXXXXXXXXXXXXXX Indianapolis

DOB XX/XX/XXXX

13. Jesse White

XXXXXXXXXXXXXXXXX Indianapolis

DOB XX/XX/XXXX

14. Angela Witty

XXXXXXXXXXXXXXXXX Indianapolis

DOB XX/XX/XXXX

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017\_\_\_\_\_



**Affidavit for Probable Cause**

**From:** Lt. Jeffrey C. Hearon

Whomever accepts custody of a completed voter application form from a prospective voter is required to sign a “certified statement of acceptance” before filing the application with a county voter registration office. The certified statement of acceptance states that the signer affirms “under the penalties for perjury that I accepted custody of this completed application from the applicant.”

Based on the follow up investigation into each of these questionable applications, it is my belief that Tiara Kurtz knowingly or intentionally made or uttered a written instrument (voter registration forms) in such a manner that were purported to have been made by another person, at another time, with different provisions or by authority of one who did not give authority IC 35-43-5-2. Moreover, Tiara Kurtz subscribed the name of another person to an affidavit of registration that contains false information, IC 3-14-2-3, and knowingly submitted voter registration applications known by Kurtz to be materially false, fictitious or fraudulent IC 3-14-3-1.1. Lastly, Tiara Kurtz made a false, material statement under oath or affirmation, knowing the statements to be false, or not believing it to be true as noted in the Certified Statement of Acceptance on the application form IC 35-44.1-2-1, and submitted them as accurate and correct for processing.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Jeffrey C. Hearon

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AFFIANT

DATED: 6/9/2017

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION

Cause No: 49

STATE OF INDIANA )  
 )  
 vs. )  
 )

INFORMATION  
COUNT I  
PROCURING OR SUBMISSION OF  
FALSE, FICTITIOUS, OR FRAUDULENT  
VOTER REGISTRATION APPLICATION  
I.C. 3-14-3-1.1(1)  
A LEVEL 6 FELONY  
COUNT II  
PERJURY  
I.C. 35-44.1-2-1(a)(1)  
A LEVEL 6 FELONY

CLAUDE NASH  
B/Male  
DOB 9/9/1979

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

between May 1, 2016 and November 8, 2016, CLAUDE NASH did knowingly procure or submit voter registration applications known by CLAUDE NASH to be materially false, fictitious or fraudulent;

COUNT II

between May 1, 2016 and November 8, 2016, CLAUDE NASH did make a false, material statement under oath or affirmation, to-wit: that he accepted custody of a completed voter registration application from an applicant; knowing said statement to be false;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44.1-2-1 that the foregoing representations are true.

/s/ Jeremy Teipen  
Affiant

June 9, 2017  
Date

**TERRY R. CURRY**  
Marion County Prosecutor  
19th Judicial Circuit

State's Witnesses:  
Jeffrey C. Hearon 5201 ISP

Randy Pratt 5536 ISP  
Matt Lawrence 6464 ISP  
Jerry Gentry 6168 ISP  
William Vann 5220 ISP  
Leonard Langland 6352 ISP  
Amy S. Gaul 5934 ISP  
Jeremy C. Franklin 7554 ISP  
Scott R. Jarvis 6784 ISP  
David R. Preston 6065 ISP  
Cindy Mowery  
Ladonna Freeman  
Debra Gazvoda  
Mary Prewitt  
Michelle Cash  
Pamela McCreary  
Marcus Nash  
Tonya Trotter

/s/ Jeremy Teipen  
Deputy Prosecuting Attorney

# AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Detective Randy Pratt swears (affirms) that:

Information set forth below in this Probable Cause Affidavit is either personally known to Affiant, information obtained from other law enforcement sources, information obtained from public records and/or information from sources otherwise identified in this Affidavit. The facts developed from this investigation are as follows and are not inclusive of all information gathered and/or developed as a result of this ongoing investigation:

On or about August 23, 2016, the Hendricks County Clerk, Ms. Debbie Hoskins, reported to Lieutenant Jeff Hearon of the Indiana State Police Department, that during June, July, and August of 2016, a significant number of voter registration applications were received by her office from the Marion County Board of Voters Registration Office. The voter registration applications were submitted to their office by a voter registration drive organization called "The Indiana Voter Registration Project", hereafter referred to as IVRP. Upon reviewing and vetting the applications, the Hendricks County Clerk's Office noted many inconsistencies with the submitted applications and were concerned that some may be forged or fraudulent. Furthermore, Ms. Hoskins advised us that many of the applicants were already registered to vote, so the on-file registrations were compared to the newly submitted applications. The newly submitted applications had the following characteristics: very sloppy penmanship, missing information, and/or contained erroneous data, such as, but not limited to the following: Applicants' printed name not matching applicants' signature, missing applicants' telephone number, and applicant address not matching applicants' county of residence.

After learning this information, Lt. Hearon scheduled a meeting with Indiana Secretary of State Connie Lawson to discuss these concerns and inquire about the Indiana Voter Registration

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Randy Pratt

Project (IVRP), and to inquire if they were a registered entity. Secretary Lawson and her staff were unaware of this organization and had not received any complaints.

During the subsequent Indiana State Police investigation on September 2, 2016, Lt. Jeff Hearon spoke with Ms. Cindy Mowery and Ms. Ladonna Freeman, Co-Directors of the Marion County Board of Voters Registration. They reported that their office had received thousands of voter registration applications from "The Indiana Voter Registration Project." According to Ms. Mowery and Ms. Freeman, several of the voter registration applications were incomplete, and when compared to on-file voter registrations for the same applicants, their signatures did not match. This is consistent with the original findings by the Hendricks County Clerk's Office.

On September 6, 2016, Indiana State Police detectives went to the Marion County Board of Voters Registration to conduct follow up interviews with the directors. Detectives learned that the IVRP had submitted 27,377 voter applications. These applications were submitted by Holiday Burke and another unknown male named Karim (employees of the IVRP). Director Cindy Mowery became suspicious of the group and sent an attorney to the IVRP office headquarters located at 2425 N. Meridian Street, Indianapolis, IN. After observing the location, the attorney expressed concerns about the legitimacy of the organization and conveyed those concerns to Director Mowery. While detectives were speaking with the directors, personnel informed the detectives that Holiday Burke was currently dropping off voter registration applications. Lt. Hearon and F/Sgt. William Vann conducted an investigative interview with Burke at the clerk's office.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Randy Pratt

The following information was learned through the interview: Burke conveyed that she was a community organizer with the Indiana Voter Registration Project (IVRP), a non-partisan voter registration drive. Burke stated that she receives her paychecks from a company identified as "Block by Block". Burke stated that the group targeted areas that were historically under represented, or disenfranchised, in order to encourage people to register to vote. This was achieved by hiring part time employees to target the identified areas and attempt to register people to vote. These employees would be paid \$50.00 per five hour shift. That same day, detectives traveled to the IVRP office located at 2425 N. Meridian Street, Indianapolis, IN. Upon arrival, detectives observed that the business did not have any signs on the door to signify an office for IVRP. A sign placed on the door instructed patrons to enter through the rear alley door. Detectives proceeded to the rear entry and upon entering, noted minimal furnishings, which consisted of folding tables and chairs. Detectives met with IVRP supervisor Ryan Garner. Garner provided additional details of IVRP. Garner stated that the IVRP maintains offices in both Indianapolis and Gary IN. Detectives later confirmed that the alleged office location in Gary was actually a vacant lot. Garner stated that IVRP worked for an organization called "Rebuild USA", as well as a group of Washington DC based attorneys. Garner declined to provide additional details, such as, who his supervisors were, if they were a registered political action committee, or a not-for-profit organization registered with the State of Indiana. When detectives questioned Garner about the concerns of the registration applications, Garner responded by saying that IVRP attempts to verify the accuracy of the information, but IVRP is limited on the ability to fully vet them due to the deadline for submission.

Upon reviewing several suspected voter registration applications from the IVRP and determining several contained missing, erroneous or fraudulent information, detectives met with personnel from the Indiana Secretary of State's Office to relay their concerns. As a result, Secretary Connie Lawson distributed a public service announcement for the general public to verify their voter I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Randy Pratt

registration records, as well as a second letter directing all Clerk's offices in the State of Indiana to carefully review applications received by the IVRP. As detectives began to conduct follow up investigation into the questionable voter registration applications, detectives learned the following information:

\*Employees of IVRP were pressured to obtain (10) applications (quota) per shift, or risk termination.

\*Employees of IVRP were advised by IVRP supervisors to obtain their quota by any means necessary.

\*Employees of IVRP would duplicate information from actual voter registration files onto new applications to meet their quota.

\*Employees of IVRP would commonly not sign the applications and provide those applications to other employees who may not have obtained their quota of applications during their shifts.

Furthermore, on October 3, 2016, Lt. Jeff Hearon applied for a search warrant for the offices of the IVRP. On October 4, 2016, detectives with the Indiana State Police executed a search warrant on the IVRP offices. During the course of the search warrant and subsequent review of information, detectives found evidence of 34,000 voter registration applications encompassing (56) Indiana counties. Furthermore, many of the applications had notations on them that the submitted applications were for juveniles, not United States citizens, people who lived out of state, had incorrect telephone numbers, incorrect zip codes, invalid or non-existent addresses, notations that real voters denied making application when contacted and notations for multiple registrations. Additionally, detectives recovered multiple voter registration applications that had not been submitted, which is in violation of IC 3-7-32-8. Holiday Burke, Verification Director from the IVRP, was informed of this violation and that an affidavit would need to be submitted

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Randy Pratt

and tendered to the respective Clerk's office for each application that was incomplete or suspected of being fraudulent or forged.

As a result of these findings, Indiana State Police Detectives initiated an investigation into the veracity of numerous voter registration applications that contained missing, incomplete, and/or erroneous applicant information and other problems as noted in the aforementioned investigation. The following facts are the results of Affiant's investigation:

On or about September 27, 2016, I was assigned to investigate (13) voter registration applications that were submitted by Indiana Voter Registration Project Employee, Claude Nash. I reviewed the applications submitted by Mr. Nash and I observed several issues. Many of the voter registrations contained non-existent addresses, non-valid telephone numbers and numerous spelling errors.

On or about November 5, 2016, Mr. Claude Nash met me at 1860 North Arlington Street, Indianapolis, IN. During a recorded interview, I explained to him that he was free to leave at any time and that he was not obligated to talk with me. He seemed eager to give me his side of the story. During the interview, Claude went back and forth, first admitting that he signed or forged the signatures to the voter registration forms, then later stating that he did not sign or forge the signatures. He also admitted that he had filled in portions of the form that the person had left blank. He also explained that he had signed up "drunks and bums" all day to get his quota for IVRP. He stated that he did feel pressure from IVRP to get his quota so that he could get paid.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

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AFFIANT

DATED: 6/9/2017



**Affidavit for Probable Cause**

**From:** Detective Randy Pratt

Below is a summary of the voter registrations submitted by Claude Nash:

1. Trakina Mitchell

XXXXXXXXXXXX

Indianapolis, Indiana

Address does not exist; phone # is not good.

2. Vannessa J. Carter

XXXXXXXXXXXX

Indianapolis, Indiana

Address does not exist; phone # belongs to a business.

3. Patricia Anderson

XXXXXXXXXXXX

Indianapolis, Indiana XXXXX

Address does not exist; phone #XXX-XXX-XXXX is not good.

4. Elise Nador

XXXXXXXXXXXX

Indianapolis, Indiana XXXXX

Address does not exist; no phone # listed.

5. Mitchell Glenn

XXXXXXXXXXXX

Indianapolis, Indiana XXXXX

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017\_\_\_\_\_

**Affidavit for Probable Cause**

**From:** Detective Randy Pratt

Address does not exist; called the listed phone #XXX-XXX-XXXX, no answer, left voice mail,

did not receive return call.

6. Christopher Stanley

XXXXXXXXXX

Indianapolis, Indiana XXXXX

Address does not exist; phone # is not good.

7. Laraine C. Chells

XXXXXXXXXX Indianapolis, Indiana XXXXX

Address does not exist, (XXXXXXXXXX came up on my maps application so I physically checked

address, no such address); no phone # listed; very sloppy handwriting on registration form.

8. Mark Willis

XXXXXXXXXX

Indianapolis, Indiana XXXXX

Address does not exist: phone #XXX-XXX-XXXX is not in service.

9. Sophia Cooper

XXXXXXXXXX

Indianapolis, Indiana XXXXX

Address does not exist, (I checked both South and North Tibbs Avenue for XXX); called the listed

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Detective Randy Pratt

phone #XXX-XXX-XXXX, the person who answered advised me that there was no Sophia Cooper associated with that phone #; Sophia did not fill out a voter registration form and she does not reside at XXXXXXXXXXXX.

10. Janas Bennett

XXXXXXXXXXXX

Indianapolis, Indiana 46218

There is an XXXXXXXXXXXX, but no XXXX; listed phone #XXX-XXX-XXXX is not a working #.

11. Miles X. Noale

XXXXXXXXXXXX

Indianapolis, Indiana 46626

Address does not exist; no phone # listed.

12. Waun Lery Joseph

XXXXXXXXXXXX

Indianapolis, Indiana 46235

Address does not exist; phone # is not good.

13. Andre Robinson

XXXXXXXXXXXX and XXXXXXXXXXXX

Indianapolis, Indiana 46220

Two addresses listed, neither exist; listed phone #XXX-XXX-XXXX is not a working #.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Randy Pratt

All addresses listed by Mr. Claude Nash, along with most of the phones numbers, appear made up or fictitious. The spelling of the names and/or addresses listed are as they appear on the voter registration forms, many of which, are not spelled correctly.

I attempted to make contact with Mr. Nash at his residence, speaking only with a Ms. Tonya Trotter who advised me that Claude was not there. Ms. Trotter was cooperative and stated that she had spoken with Mr. Nash in regards to telling the truth about making up all the information on the voter registration forms. She explained to me that his response to her was, "let them do their work". She agreed to a recorded interview about her conversations with Mr. Nash. She stated that she and Mr. Nash have had several conversations about their involvement in filling out fictitious information on several voter registration forms. She explained that Claude had filled out two forms for his brother, Marcus Nash, signing or forging his name to both forms. Ms. Trotter also stated that both she and Claude would have a "bum" fill out 3 forms for each of them, for each day that they had worked for IVRP. According to Ms. Trotter, the reward for the bum was a cigarette. Ms. Trotter explained to me that she had pleaded with Mr. Nash to tell us the truth as she had done. During her interview, I explained to her that she was free to leave the interview at any time and that she was not obligated to talk with me.

I requested, and received, a copy of the voter registration application form for Marcus Nash. I observed that the application had been certified by Claude Nash. The writing style on the voter registration application for Marcus Nash is similar to the writing style of Claude Nash. I have been working on this case for several weeks and am familiar with the writing style of Mr. Claude Nash. During a phone interview with Marcus Nash, he stated that he was not aware that his brother had filled out, and signed, his voter registration form. However, Marcus Nash stated that he may have given Claude permission to fill it out.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

---

AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Detective Randy Pratt

Whomever accepts custody of a completed voter application form from a prospective voter is required to sign a “certified statement of acceptance” before filing the application with a county voter registration office. The certified statement of acceptance states that the signer affirms “under the penalties for perjury that I accepted custody of this completed application from the applicant.”

Based on the follow up investigation into each of these questionable applications, it is my belief that Claude Nash knowingly or intentionally, made or uttered, a written instrument (voter registration forms) in such a manner that were purported to have been made by another person, at another time, with different provisions or by authority of one who did not give authority, IC 35-43-5-2. Moreover, Claude Nash subscribed the name of another person to an affidavit of registration that contains false information, IC 3-14-2-3, and knowingly submitted voter registration applications known by Nash to be materially false, fictitious or fraudulent, IC 3-14-3-1.1. Lastly, Claude Nash made a false material statement under oath or affirmation, knowing the statements to be false or not believing it to be true as noted in the Certified Statement of Acceptance on the application form, IC 35-44.1-2-1, and submitted them as accurate and correct for processing.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

---

AFFIANT

DATED: 6/9/2017

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION

Cause No: 49

STATE OF INDIANA )  
 )  
 vs. )  
 )

**INFORMATION**  
**COUNT I**  
**PROCURING OR SUBMISSION OF**  
**FALSE, FICTITIOUS, OR FRAUDULENT**  
**VOTER REGISTRATION APPLICATION**  
**I.C. 3-14-3-1.1(1)**  
**A LEVEL 6 FELONY**  
**COUNT II**  
**PERJURY**  
**I.C. 35-44.1-2-1(a)(1)**  
**A LEVEL 6 FELONY**

**TINA M PACE**  
**B/Female**  
**DOB 11/29/1973**

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

On or about between May 1, 2016 and November 8, 2016, TINA M PACE did knowingly procure or submit voter registration applications known by TINA M PACE to be materially false, fictitious or fraudulent;

COUNT II

On or about between May 1, 2016 and November 8, 2016, TINA M PACE did make a false, material statement under oath or affirmation, to-wit: that she accepted custody of a completed voter registration application from an applicant; knowing said statement to be false;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44.1-2-1 that the foregoing representations are true.

/s/ Jeremy Teipen  
Affiant

June 9, 2017  
Date

State's Witnesses:  
Jeffrey C. Hearon 5201 ISP

**TERRY R. CURRY**  
Marion County Prosecutor  
19th Judicial Circuit

Randy Pratt 5536 ISP  
Matt Lawrence 6464 ISP  
Jerry Gentry 6168 ISP  
William Vann 5220 ISP  
Leonard Langland 6352 ISP  
Amy S. Gaul 5934 ISP  
Jeremy C. Franklin 7554 ISP  
Scott R. Jarvis 6784 ISP  
David R. Preston 6065 ISP  
Cindy Mowery  
Ladonna Freeman  
Debra Gazvoda  
Mary Prewitt  
Michelle Cash  
Pamela McCreary  
Darryle G. Trotter

/s/ Jeremy Teipen  
Deputy Prosecuting Attorney

# AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

The Affiant, Indiana State Police Detective Randy Pratt swears (affirms) that:

Information set forth below in this Probable Cause Affidavit is either personally known to Affiant, information obtained from other law enforcement sources, information obtained from public records and/or information from sources otherwise identified in this Affidavit. The facts developed from this investigation are as follows and are not inclusive of all information gathered and/or developed as a result of this ongoing investigation:

On or about August 23, 2016, the Hendricks County Clerk, Ms. Debbie Hoskins, reported to Lieutenant Jeff Hearon of the Indiana State Police Department, that during June, July, and August of 2016, a significant number of voter registration applications were received by her office from The Marion County Board of Voters Registration Office. The voter registration applications were submitted to their office by a voter registration drive organization called "The Indiana Voter Registration Project", hereafter referred to as IVRP. Upon reviewing and vetting the applications, the Hendricks County Clerk's Office noted many inconsistencies with the submitted applications and were concerned that some may be forged or fraudulent. Furthermore, Ms. Hoskins advised us that many of the applicants were already registered to vote, so the on-file registrations were compared to the newly submitted applications. The newly submitted applications had the following characteristics: very sloppy penmanship, missing information, and/or contained erroneous data, such as, but not limited to the following: Applicants' printed name not matching applicants' signature, missing applicants' telephone number, and applicant address not matching the applicants' county of residence.

After learning this information, Lt. Hearon scheduled a meeting with Indiana Secretary of State Connie Lawson to discuss these concerns and inquire about the Indiana Voter Registration

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

---

AFFIANT

DATED: 6/9/2017



## Affidavit for Probable Cause

**From:** Detective Randy Pratt

Project (IVRP), and to inquire if they were a registered entity. Secretary Lawson and her staff were unaware of this organization and had not received any complaints.

During the subsequent Indiana State Police investigation on September 2, 2016, Lt. Jeff Hearon spoke with Ms. Cindy Mowery and Ms. Ladonna Freeman, Co-Directors of the Marion County Board of Voters Registration. They reported that their office had received thousands of voter registration applications from "The Indiana Voter Registration Project." According to Ms. Mowery and Ms. Freeman, several of the voter registration applications were incomplete, and when compared to on-file voter registrations for the same applicants, their signatures did not match. This is consistent with the original findings by the Hendricks County Clerk's Office.

On September 6, 2016, Indiana State Police detectives went to the Marion County Board of Voters Registration to conduct follow up interviews with the directors. Detectives learned that the IVRP had submitted 27,377 voter applications. These applications were submitted by Holiday Burke and another unknown male named Karim (employees of the IVRP). Director Cindy Mowery became suspicious of the group and sent an attorney to the IVRP office headquarters located at 2425 N. Meridian Street, Indianapolis, IN. After observing the location, the attorney expressed concerns about the legitimacy of the organization and conveyed those concerns to Director Mowery. While detectives were speaking with the directors, personnel informed the detectives that Holiday Burke was currently dropping off voter registration applications. Lt. Hearon and F/Sgt. William Vann conducted an investigative interview with Burke at the clerk's office.

The following information was learned through the interview: Burke conveyed that she was a community organizer with the Indiana Voter Registration Project (IVRP), a non-partisan voter registration drive.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

---

AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Randy Pratt

Burke stated that she receives her paychecks from a company identified as “Block by Block”. Burke stated that the group targeted areas that were historically under represented, or disenfranchised, in order to encourage people to register to vote. This was achieved by hiring part time employees to target the identified areas and attempt to register people to vote. These employees would be paid \$50.00 per five hour shift. That same day, detectives traveled to the IVRP office located at 2425 N. Meridian Street, Indianapolis, IN. Upon arrival, detectives observed that the business did not have any signs on the door to signify an office for IVRP. A sign placed on the door instructed patrons to enter through the rear alley door. Detectives proceeded to the rear entry and upon entering, noted minimal furnishings, which consisted of folding tables and chairs. Detectives met with IVRP supervisor Ryan Garner. Garner provided additional details of IVRP. Garner stated that the IVRP maintains offices in both Indianapolis and Gary, IN. Detectives later confirmed the alleged office location in Gary was actually a vacant lot. Garner stated that IVRP worked for an organization called “Rebuild USA”, as well as a group of Washington DC based attorneys. Garner declined to provide additional details, such as, who his supervisors were, if they were a registered political action committee, or a not-for-profit organization registered with the State of Indiana. When detectives questioned Garner about the concerns of the registration applications, Garner responded by saying that IVRP attempts to verify the accuracy of the information, but IVRP is limited on the ability to fully vet them due to the deadline for submission.

Upon reviewing several suspected voter registration applications from the IVRP and determining that several contained missing, erroneous or fraudulent information, detectives met with personnel from the Indiana Secretary of State's Office to relay their concerns. As a result, Secretary Connie Lawson distributed a public service announcement for the general public to verify their voter registration records, as well as a second letter directing all Clerk's offices in the State of Indiana to carefully review applications received by the IVRP. As detectives began to

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

---

AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Randy Pratt

conduct follow up investigation into the questionable voter registration applications, detectives learned the following information:

- \*Employees of IVRP were pressured to obtain (10) applications (quota) per shift, or risk termination.
- \*Employees of IVRP were advised by IVRP supervisors to obtain their quota by any means necessary.
- \*Employees of IVRP would duplicate information from actual voter registration files onto new applications to meet their quota.
- \*Employees of IVRP would commonly not sign their applications and provide those applications to other employees who may not have obtained their quota of applications during their shifts.

Furthermore, on October 3, 2016, Lt. Jeff Hearon applied for a search warrant for the offices of the IVRP. On October 4, 2016, detectives with the Indiana State Police executed a search warrant on the IVRP offices. During the course of the search warrant and subsequent review of information, detectives found evidence of 34,000 voter registration applications encompassing (56) Indiana counties. Furthermore, many of the applications had notations on them that the submitted applications were for juveniles, not United States citizens, people who lived out of state, had incorrect telephone numbers, incorrect zip codes, invalid or non-existent addresses, notations that real voters denied making application when contacted and notations for multiple registrations. Additionally, detectives recovered multiple voter registration applications that had not been submitted, which is in violation of IC 3-7-32-8. Holiday Burke, Verification Director from the IVRP, was informed of this violation, and that an affidavit would need to be submitted and tendered to the respective Clerk's office for each application that was incomplete, or suspected of being fraudulent or forged.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

---

AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Randy Pratt

As a result of these findings, Indiana State Police Detectives initiated an investigation into the veracity of numerous voter registration applications that contained missing, incomplete, and/or erroneous applicant information and other problems as noted in the aforementioned investigation. The following facts are the results of Affiant's investigation:

I was assigned (18) voter registration forms that were completed and submitted by canvasser Tina Pace. As a result of my investigation and admissions by Tina Pace, I was able to determine that (6) of the (18) voter registration applications were fictitious. For each of the below mentioned voter registration applications, a check was conducted through the Indiana Bureau of Motor Vehicles, Nationwide credit check, criminal history, utilities, social security and bankruptcy court. Additionally, Detective Pratt attempted to locate the address on each application. If a phone number was listed on the application, that number was called. The following names and information are from each of the (18) voter registrations:

1. Darryle Trotter, XXXXXXXXXXXX Indianapolis; valid name and address. I interviewed Mr. Trotter at his home.

\*\*\* Mr. Trotter's summary of his experience is listed below.

2. Jack Shepherd, XXXXXXXXXXXX, Indianapolis; fictitious address and the phone # has been changed or disconnected. The above listed checks conducted could not verify this individual or any information listed on the registration form.

3. Sharee Williams, XXXXXXXXXXXX, Lafayette; address does exist, but a person by the name of Watson lives at this address. The above listed checks conducted do show that Ms. Williams had previously resided at this address.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Detective Randy Pratt

4. Darrian Bates, XXXXXXXXXXXX, Indianapolis; address does exist, but after checking at the apartment building office, no one by that name lives there. The above listed checks conducted do show that a Bates lived at the XXXXXXXXXXXX address at one time.

5. Annetta Summers, XXXXXXXXXXXX, Indianapolis; verified the address and phone #. During my interview with Annetta, she stated that she did not vote because she was sick at the time. The above listed checks conducted after my interview with her indicated that Ms. Summers is now deceased.

6. Dthisha Burroughs, XXXXXXXXXXXX, Indianapolis; phone # listed comes back to an engineering firm. The address appears to be valid, but I could not raise anyone. The above listed checks conducted could not verify this person or any of the information.

7. Tayrell Cusic, XXXXXXXXXXXX, Indianapolis; I verified that Mr. Cusic lives at this address and that he had voted with no problems. He does not remember Tina Pace, but she probably filled out the boxes, and he signed the form. The above listed checks conducted verified Tayrell Cusic, but showed a different address listed for him.

8. Michael Smiley, XXXXXXXXXXXX, Indianapolis; no phone # listed. I did meet with Mr. Smiley who states that he had voted with no problems and that he signed his voter registration form himself.

9. Gregory L. Saunder, XXXXXXXXXXXX, Indianapolis; no call back from a call I made to the # listed on the form. Because no one was home during my visit, I left my business card. The above listed checks conducted could not verify this person and address.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Detective Randy Pratt

10. Dwight Allen, XXXXXXXXXXXX, Indianapolis; phone # listed does not come back to Dwight Allen. During my visit, Mr. Allen stated that he went over and signed his voter registration form. The above listed checks conducted verify Mr. Allen and his address.

11. Peter Thompkins, XXXXXXXXXXXX; unable to verify Mr. Thompkins or his address. The above listed checks conducted show a Mr. Peter Thompkins listed at XXXXXXXXXXXX, Indianapolis. No such address exists.

12. Tyrone Beard, XXXXXXXXXXXX, Indianapolis; fictitious address. The above listed checks conducted verify Tyrone Beard, but not his address. No contact made.

13. Claudette D. Thompkins, XXXXXXXXXXXX, Indianapolis; I talked to Ms. Thompkins. She states that she filled out the registration form and signed it. The above listed checks conducted could not verify anything on her.

14. Gregory Sledge, XXXXXXXXXXXX, Indianapolis; Mr. Sledge had previously resided at this address. A Ms. Cook now resides there. Ms. Cook would not give me his new address and the above listed checks conducted could not verify any information on him.

15. William E. Carmickle, XXXXXXXXXXXX, Indianapolis; made contact with Mr. Carmickle. He stated that with the help of a young lady, he filled out the registration form and signed it. The above listed checks conducted could not verify him or any addresses.

16. John Birdsong, XXXXXXXXXXXX, Indianapolis; I verified this person and address. John, an elderly man, could not remember if he had signed the form himself. The above listed checks conducted indicate that he is now deceased.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Randy Pratt

17. Daniel Beverly, XXXXXXXXXXXX, Indianapolis; I was unable to locate this address. The above listed checks conducted could not verify Mr. Beverly or this address. No contact made.

18. Christian Turman, XXXXXXXXXXXX, Indianapolis; I was unable to locate the address or contact this person by phone. This registration form was difficult to read and almost illegible in certain boxes. The above listed checks conducted verify the person, but list a different address.

On November 22, 2016, I attempted to contact a Mr. Darryle Glen Trotter, XXXXXXXXXXXX, Indianapolis, XXXXX. I verified that this address was valid. I then called the phone #XXX-XXX-XXXX which is listed on the voter registration form. I left a voice mail for Mr. Trotter to return my call. Right after I called this #, Mr. Trotter and his wife came outside and met with me. After explaining why I was there, I showed them Mr. Trotter's registration form. Mr. Trotter stated that he did not fill out the registration form and he did not sign it. They suspected that canvasser/suspect Tonya Trotter, who is Darryle's cousin, had something to do with this. Mr. Trotter stated that he had experienced some trouble voting because his name was listed 4 times on the voter registration. I called Tonya Trotter via phone, but was unable to contact her in reference to this matter. The reason they feel that Tonya may have filled out the voter registration form is because Tonya knows enough of Darryle's information to fill out the form. Darryle's wives' name is Tanya Johnson. Ms. Johnson stated that she kept her last name because she did not want the last name of Trotter. Canvasser/suspect Tina Pace certified Mr. Trotter's voter registration form.

On November 29, 2016, I stopped by Ms. Pace's residence but was unable to make contact so I left my business card. Ms. Pace returned my call and I requested to speak with her about her employment with the Indiana Voter Registration Project Organization. She was cooperative and I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Randy Pratt

willing to speak with me. We agreed to meet at her residence. She allowed me to record two interviews. I spoke with her about a number of the voter registration applications being false and fictitious. She admitted that she had filled out several of the forms with false information in an effort to get her quota for IVRP. She also stated several times that she never signed or forged a name to any of the voter registration forms. However, in our second recorded interview, she admitted that she would have a random person sign or forge the name of the person on the voter registration form so that she would not have to sign it or forge it herself. She could not remember how many of the voter registration forms that she made up, and could not remember how many of the forms that she had other unknown people sign or forge.

Ms. Pace also stated that Karim had fired her from IVRP, but did not know the reason why. During both of these interviews, I informed Ms. Pace that she was free to stop the interview at any time.

Whoever accepts custody of a completed voter application form from a prospective voter is required to sign a "certified statement of acceptance" before filing the application with a county voter registration office. The certified statement of acceptance states that the signer affirms "under the penalties for perjury that I accepted custody of this completed application from the applicant."

Based on the follow up investigation into each of these questionable applications, it is my belief that Tina Pace knowingly or intentionally, made or uttered, a written instrument (voter registration forms) in such a manner that it were purported to have been made by another person, at another time, with different provisions or by authority of one who did not give authority, IC 35-43-5-2. Moreover, Tina Pace subscribed the name of another person to an affidavit of registration that contains false information, IC 3-14-2-3, and knowingly submitted voter I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

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AFFIANT

DATED: 6/9/2017



**Affidavit for Probable Cause**

**From:** Detective Randy Pratt

registration applications known by Pace to be materially false, fictitious or fraudulent, IC 3-14-3-1.1. Lastly, Tina Pace made a false material statement under oath or affirmation, knowing the statements to be false or not believing it to be true as noted in the Certified Statement of Acceptance on the application form, IC 35-44.1-2-1, and submitted them as accurate and correct for processing.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017\_\_\_\_\_

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION

Cause No: 49

STATE OF INDIANA )  
 )  
 vs. )  
 )

**INFORMATION**  
**COUNT I**  
**PROCURING OR SUBMISSION OF**  
**FALSE, FICTITIOUS, OR FRAUDULENT**  
**VOTER REGISTRATION APPLICATION**  
**I.C. 3-14-3-1.1(1)**  
**A LEVEL 6 FELONY**  
**COUNT II**  
**PERJURY**  
**I.C. 35-44.1-2-1(a)(1)**  
**A LEVEL 6 FELONY**

**Glynn Parrish**  
**B/Male**  
**DOB 8/29/1964**

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

On or about between May 1, 2016 and November 8, 2016, Glynn Parrish did knowingly procure or submit voter registration applications known by Glynn Parrish to be materially false, fictitious or fraudulent;

COUNT II

On or about between May 1, 2016 and November 8, 2016, Glynn Parrish did make a false, material statement under oath or affirmation, to-wit: that he accepted custody of a completed voter registration application from an applicant; knowing said statement to be false;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44.1-2-1 that the foregoing representations are true.

/s/ Jeremy Teipen  
Affiant

June 9, 2017  
Date

State's Witnesses:  
Jeffrey C. Hearon 5201 ISP

**TERRY R. CURRY**  
Marion County Prosecutor  
19th Judicial Circuit

Brooks Johnson 5914 ISP  
rick Strong 6210 ISP  
Chris Campione 8094 ISP  
William Vann 5220 ISP  
Leonard Langland 6352 ISP  
Amy S. Gaul 5934 ISP  
Jeremy C. Franklin 7554 ISP  
Scott R. Jarvis 6784 ISP  
David R. Preston 6065 ISP  
Cindy Mowery  
Ladonna Freeman  
Debra Gazvoda  
Mary Prewitt  
Michelle Cash  
Pamela McCreary  
Frank C. Fotia  
Mary Kozak  
Marjorie Clawson  
Susan Chick  
Mary Haugseth  
David Zmoldzinski  
Victor Badar

/s/ Jeremy Teipen  
Deputy Prosecuting Attorney

# AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Brooks Johnson swears (affirms) that:

Information set forth below in this Probable Cause Affidavit is either personally known to the Affiant, is information obtained from other law enforcement sources, or is information obtained from public records and/or information from sources otherwise identified in this affidavit. The facts developed from this investigation are as follows and are not inclusive of all information gathered and/or developed as a result of this ongoing investigation.

On or about October 6, 2016, I was contacted by Indiana State Police Lt. Jeff Hearon in reference to a case involving the "Indiana Voter Registration Project", hereafter referred to as IVRP. Lt. Hearon advised me that the IVRP had submitted voter registration applications in Hendricks County, as well as St. Joseph County that contained inconsistencies and appeared to be forged and/or fraudulent.

On October 6, 2016, I spoke to Frank Fotia, an employee of the St. Joseph County Voter Registration Office, in reference to this case. Frank advised that the IVRP had dropped off numerous voter registration applications at the St. Joseph County Voter Registration Office, further advising that (8) of the voter registration applications were fraudulent. The St. Joseph County Voter Registry Office compared the voter registration applications to voter registry records, and when compared, they learned that some of the voter registry applications contained false DOB's, false Social Security numbers and that a deceased person's name and identifying information was also used on one of the voter registration applications. Furthermore, Frank advised that additional voter registration applications were being examined for fraud.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Brooks Johnson

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Brooks Johnson

On October 6, 2016, I received an email from Frank Fotia which contained copies of (8) voter registration applications that were confirmed to contain fraudulent information. Several of the voter registration applications contained the name of Glynn Parish as being the person that signed the Certified Statements of Acceptance. A perjury type notice was noted near where Glynn Parish signed the voter registration applications.

On October 7, 2016, I again spoke to Frank Fotia in reference to this case. Frank advised that on September 28, 2016, the IVRP dropped off (1,711) voter registration applications at the St. Joseph County Voter Registration Office, as well as an additional (769) voter registration applications on October 6, 2016. Frank advised that the IVRP representative that had dropped off the voter registration applications both times, used the name Holiday Burke. Frank confirmed that no one at the St. Joseph County Voter Registration Office had asked Holiday Burke to show an ID Card. Frank advised that he had not been present when the voter registration applications were dropped off on September 28, 2016, but that he had been present when the registration applications were dropped off on October 6, 2016. Frank described the female who had dropped off the voter registration applications on October 6, 2016, as being a white female, in her early twenties, thin, with shoulder length brown hair. Frank advised that the voter registration applications that were dropped off on September 28, 2016, contained a pink sticky note advising that the DOB's did not match, and that the voter registration applications that were dropped off on October 6, 2016, contained a yellow sticky note indicating that there were issues. Frank confirmed that the IVRP had not submitted any fraud affidavits when they dropped off voter registration applications on September 28, 2016, or on October 6, 2016.

On October 7, 2016, Indiana State Police Detective Ben Werner went to the St. Joseph County Voter Registration Office, obtained the two sticky notes and then submitted them as items of evidence at the Bremen State Police Post. Detective Werner and I examined the sticky notes, I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Brooks Johnson

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Brooks Johnson

observing that the sticky note submitted on September 28, 2016, noted the following: “canvasser filled out every registration in this packet. Every date of birth is invalid”. The sticky note submitted on October 6, 2016, noted the following: “St Joseph Problematic 61”.

One of the original (8) fraudulent voter registration applications given to the Indiana State Police by the St. Joseph County Voter Registration Office contained an applicant by the name of Robert Clawson. The application noted that Robert Clawson’s DOB was XX/XX/XXXX. The Certified Statement of Acceptance was signed under the name Glynn Parish. On October 26, 2016, Indiana State Police Detective Chad Sherwood spoke to an individual named Marjorie Clawson. Marjorie stated that she had been married to Robert Clawson for sixty four years, advising Detective Sherwood that Robert Clawson had died in 2010. Marjorie advised that Robert Clawson’s correct DOB does not match the DOB that is listed on the voter registration application. Marjorie confirmed that she does not know anyone by the name of Glynn Parish, further advising that she had never spoken to anyone from the IVRP.

A voter registration application had been submitted by the IVRP that listed the name and identifying information of a Mary Kozak. The application for Mary Kozak had also been signed under the name Glynn Parish in the area for the Certified Statement of Acceptance. Detective Sherwood spoke to Mary and learned that her voter registration application contained a false DOB and a false last four numbers of her Social Security number. Mary advised Detective Sherwood that she did not know a Glynn Parish and that she had not spoken to anyone at the IVRP.

On November 3, 2016, I went to the St. Joseph County Voter Registration Office and was provided with approximately (50) more voter registration applications that the IVRP had

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Brooks Johnson

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Brooks Johnson

submitted to their office, all of which contained fraudulent information. I then made photocopies of the voter registration applications.

Many of the fraudulent voter registration applications had been signed by Glynn Parish under the pains and penalties of perjury, noting that he was the person who had accepted custody of the completed applications. I then reviewed (28) of the voter registration applications that the St. Joseph County Voter Registration Office had deemed to contain fraudulent information, all of which were signed by Glenn Parrish. The handwriting on the voter registration applications appears to be the same. The following is a sampling of the fraudulent voter registration applications:

Glynn Parish signed a voter registration application on September 30, 2016, under the pains and penalties of perjury, noting that he accepted custody of a voter registration application from an individual by the name of Susan Chick. The voter registration application noted Susan Chick's DOB as being XX/XX/XXXX, and the last four of her Social Security number as being XXXX. Based on Bureau of Motor Vehicle (BMV) records, past voter records and by Susan Chick's own admission, her correct DOB is not XX/XX/XXXX, and her Social Security number does not end in XXXX. Susan denied filling out the voter registration application and denied knowing a Glynn Parish.

Glynn Parish signed a voter registration application on September 20, 2016, under the pains and penalties of perjury, noting that he accepted a voter registration application from an individual named Mary Haugseth. The DOB listed on the application for Mary Haugseth was XX/XX/XXXX, and the last four of her Social Security number as being XXXX. I have confirmed through BMV records and voter registry records that the DOB and Social Security

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Brooks Johnson

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Brooks Johnson

number listed on the voter registration application for Mary Haugseth are fraudulent. Furthermore, I have also confirmed that Mary Haugseth is deceased.

Glynn Parish signed a voter registration application on XX/XX/XXXX, under the pains and penalties of perjury, noting that he had accepted a voter registration application from an individual by the name of David Zmoldzinski. The DOB listed on the application for David Zmoldzinski's was XX/XX/XXXX, and the last four of his Social Security number as being XXXX. David advised the St. Joseph County Voter Registration Office that he had not filled out the application and that he has not registered to vote in years. David also noted that the DOB and the Social Security number listed on the voter registration application are not his correct DOB and Social Security number.

Glynn Parish signed a voter registration application on (date difficult to read, but September of 2016), under the pains and penalties of perjury, noting that he had accepted a voter registration application from an individual by the name of Victor Badar. The DOB listed on the application for Victor Badar was XX/XX/XXXX, and the last four of his Social Security number as being XXXX. BMV records, Social Security records and voter registry records indicate that Victor Badar's correct DOB is not XX/XX/XXXX, and that his Social Security number does not end in XXXX. Furthermore, I have confirmed that Victor Badar has been deceased since XX/XX/XXXX.

Glynn Parish was interviewed by Indiana State Police Detective Sgt. Rick Strong and Detective Chris Campione on October 25, 2016. Glynn advised Sgt. Strong and Detective Campione of the following: He had worked for the IVRP for approximately twelve days in 2016, and that the IVRP had paid him seventy five dollars a day to register people to vote. He advised that he had been paid by check, describing the check as being a business style check. He advised that he had I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Brooks Johnson

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AFFIANT

DATED: 6/9/2017



**Affidavit for Probable Cause**

**From:** Brooks Johnson

a quota to fulfill, that the quota was impossible, and that if you could not keep up with the quota, then you would not be called back to work for the IVRP on the following day. He advised that he had mainly solicited people at gas stations in both Lake County and St. Joseph County, that he had never gone door to door, and advised that some people he had solicited would not give out all of their information. He advised that he could not keep up with the quota and that he had probably made some mistakes. He then admitted that he had gone to a library and looked up the individuals in a phone book. He then filled in the DOB and Social Security number on each application, admitting that the DOB's and Social Security numbers did not match up. He advised that other individuals had gotten into trouble with the IVRP for looking up information in the phone book and then he did the same thing.

Whomever accepts custody of a completed voter application form from a prospective voter is required to sign a "certified statement of acceptance" before filing the application with a county voter registration office. The certified statement of acceptance states that the signer affirms "under the penalties for perjury that I accepted custody of this completed application from the applicant."

Based on the follow up investigation into each of these questionable applications, it is my belief that Glynn Parish, knowingly or intentionally, caused to be made or uttered, a written instrument (voter registration forms) in such a manner that they were purported to have been made by another person, at another time, with different provisions or by authority of one who did not give authority, IC 35-43-5-2. Moreover, Glynn Parish did subscribe the name of another person to an affidavit of registration that contains false information, IC 3-14-2-3, and knowingly submitted voter registration applications known by Glynn Parish to be materially false, fictitious, or fraudulent, IC 3-14-3-1.1. Lastly, Glynn Parish made a false material statement under oath or affirmation, knowing the statements to be false or not believing it to be true as noted in the I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Brooks Johnson

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Brooks Johnson

Certified Statement of Acceptance on the application form, IC 35-44.1-2-1, and submitted them as accurate and correct for processing.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Brooks Johnson

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AFFIANT

DATED: 6/9/2017\_\_\_\_\_

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION

Cause No: 49

STATE OF INDIANA )  
 )  
 vs. )  
 )

**INFORMATION**  
**COUNT I**  
**PROCURING OR SUBMISSION OF**  
**FALSE, FICTITIOUS, OR FRAUDULENT**  
**VOTER REGISTRATION APPLICATION**  
**I.C. 3-14-3-1.1(1)**  
**A LEVEL 6 FELONY**  
**COUNT II**  
**PERJURY**  
**I.C. 35-44.1-2-1(a)(1)**  
**A LEVEL 6 FELONY**

**Tonya Trotter**  
**B/Female**  
**DOB 9/27/1978**

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

On or about between May 1, 2016 and November 8, 2016, Tonya Trotter did knowingly procure or submit voter registration applications known by Tonya Trotter to be materially false, fictitious or fraudulent;

COUNT II

On or about between May 1, 2016 and November 8, 2016, Tonya Trotter did make a false, material statement under oath or affirmation, to-wit: that she accepted custody of a completed voter registration application from an applicant; knowing said statement to be false;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44.1-2-1 that the foregoing representations are true.

/s/ Jeremy Teipen  
Affiant

June 9, 2017  
Date

**TERRY R. CURRY**  
Marion County Prosecutor  
19th Judicial Circuit

State's Witnesses:  
Jeffrey C. Hearon 5201 ISP

Harris Smith 6074 ISP  
Matt Lawrence 6464 ISP  
Jerry Gentry 6168 ISP  
William Vann 5220 ISP  
Leonard Langland 6352 ISP  
Amy S. Gaul 5934 ISP  
Jeremy C. Franklin 7554 ISP  
Scott R. Jarvis 6784 ISP  
David R. Preston 6065 ISP  
Cindy Mowery  
Ladonna Freeman  
Debra Gazvoda  
Mary Prewitt  
Michelle Cash  
Pamela McCreary

/s/ Jeremy Teipen  
Deputy Prosecuting Attorney

# AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Harris Smith Detective Harris Smith swears (affirms) that:

Information set forth below in this Probable Cause Affidavit is either personally known to Affiant, information obtained from other law enforcement sources, information obtained from public records and/or information from sources otherwise identified in this Affidavit. The facts developed from this investigation are as follows and is not inclusive of all information gathered and developed as a result of this ongoing investigation:

On or about August 23, 2016, the Hendricks County Clerk, Ms. Debbie Hoskins, reported to Lieutenant Jeff Hearon of the Indiana State Police Department that during June, July, and August of 2016, a significant number of voter registration applications were received by her office from The Marion County Board of Voters Registration Office. The voter registration applications were submitted to their office by a voter registration drive organization called "The Indiana Voter Registration Project" hereafter referred to as IVRP. Upon reviewing and vetting the applications, The Hendricks County Clerk's Office noted many inconsistencies with the submitted applications and was concerned some may be forged or fraudulent. Furthermore, Ms. Hoskins advised many of the applicants were already registered to vote so the on-file registrations were compared to the newly submitted applications. The newly submitted applications had the following characteristics: very sloppy penmanship, missing information, and/or contained erroneous data, such as, but not limited to the following: Applicants' printed name not matching applicant's signature, missing applicant telephone number and applicant address not matching applicant county of residence.

After learning this information, Lt. Hearon scheduled a meeting with Indiana Secretary of State Connie Lawson to discuss these concerns and inquire about the Indiana Voter Registration

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Harris Smith

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Harris Smith

Project (IVRP), and if they were a registered entity. Secretary Lawson and her staff were unaware of this organization and had not received any complaints.

During the subsequent Indiana State Police investigation on September 2, 2016, Lt. Jeff Hearon spoke with Ms. Cindy Mowery and Ms. Ladonna Freeman, Co-Directors of the Marion County Board of Voters Registration. They reported that their office has received thousands of voter registration applications from "The Indiana Voter Registration Project (IVRP)." According to Ms. Mowery and Ms. Freeman, several of the voter registration applications were incomplete, and when compared to on-file voter registrations for the same applicant's, their signatures did not match. This is consistent with the original findings by the Hendricks County Clerk's Office.

On September 6, 2016, Indiana State Police detectives went to the Marion County Board of Voters Registration to conduct follow up interviews with the directors. Detectives learned that the IVRP had submitted 27,377 voter applications. These applications were submitted by Holly Burke and another unknown male named Karim (employees of the IVRP). Director Cindy Mowery became suspicious of the group and sent an attorney to the IVRP office headquarters located at 2425 N. Meridian Street Indianapolis, Indiana. After observing the location, the attorney expressed concern about the legitimacy of the organization and conveyed those concerns to Director Mowery. While detectives were speaking with the directors, personnel informed the detectives that Holly Burke was currently dropping off voter registration applications. Lt. Hearon and F/Sgt. William Vann conducted an investigative interview with Burke at the clerk's office. The following information was learned through the interview: Burke conveyed that she was a community organizer with the Indiana Voter Registration Project (IVRP), a non-partisan voter registration drive. Burke stated that she receives her paychecks from a company identified as Block by Block. Burke stated the group targeted areas that were historically under represented or disenfranchised in order to encourage people to register to vote. I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Harris Smith

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Harris Smith

This was achieved by hiring part time employees to target the identified areas and attempt to register people to vote. These employees would be paid \$50.00 per five hour shift. That same day, detectives traveled to the IVRP office at 2425 N. Meridian Street Indianapolis, IN. Upon arrival, detectives observed that the business did not have any signs on the door to signify an office for IVRP. A sign placed on the door instructed patrons to enter through the rear alley door. Detectives proceeded to the rear entry and noted minimal furnishings , which consisted of folding tables and chairs. Detectives met with IVRP supervisor Ryan Garner. Garner provided additional details of IVRP. Garner stated that the IVRP maintains offices in Indianapolis and Gary Indiana. Detectives later confirmed the alleged office location in Gary was actually a vacant lot. Garner stated that IVRP worked for an organization called Rebuild USA, as well as a group of Washington DC based attorneys. Garner declined to provide additional details, such as, who his supervisors were, if they were a registered political action committee or a not-for-profit organization registered with the State of Indiana. When detectives questioned Garner about the concerns of the registration applications, Garner responded by saying that IVRP attempts to verify the accuracy of the information, but IVRP is limited on the ability to fully vet them due to the deadline for submission.

Upon reviewing several suspected voter registration applications from the IVRP and determining several contained missing, erroneous or fraudulent information, detectives met with personnel from the Indiana Secretary of State's Office to relay the concerns. As a result, Secretary Connie Lawson distributed a public service announcement for the general public to verify their voter registration records, as well as a second letter directing all clerk's offices in the State of Indiana to carefully review applications received by the IVRP. As detectives began to conduct follow up investigation into the questionable voter registration applications, detectives learned the following information:

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Harris Smith

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Harris Smith

\*Employees of IVRP were pressured to obtain 10 applications (quota) per shift, or risk termination.

\*Employees of IVRP were advised by IVRP supervisors to get their quota by any means necessary.

\*Employees of IVRP would duplicate information from actual voter registration files onto new applications to meet quota.

\*Employees of IVRP would commonly not sign the applications and provide applications to other employees who may not have obtained their quota of applications during their shifts.

Furthermore, Lt. Jeff Hearon applied for a search warrant for the offices of the IVRP on October 3, 2016. On October 4, 2016, detectives with the Indiana State Police executed a search warrant on the IVRP offices. During the course of the search warrant and subsequent review of information, detectives found evidence of 34,000 voter registration applications encompassing 56 Indiana counties. Furthermore, many of the applications had notations on them that the submitted applications were for juveniles, not United States citizens, people who lived out of state, incorrect telephone numbers, incorrect zip codes, invalid or non-existent addresses, notations that real voters denied making application when contacted, notations for multiple registrations. Additionally, detectives recovered multiple voter registration applications that had not been submitted in violation of IC 3-7-32-8. Holiday Burke, Verification Director from the IVRP, was informed of this violation and that an affidavit would need to be submitted and tendered to the respective clerk's office for each application that was incomplete or suspected of being fraudulent or forged.

As a result of these findings, Indiana State Police Detectives initiated an investigation into the veracity of numerous voter registration applications that contained missing, incomplete, and/or

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Harris Smith

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AFFIANT

DATED: 6/9/2017



## Affidavit for Probable Cause

**From:** Harris Smith

erroneous applicant information and other problems as noted in the aforementioned investigation. The following facts are the results of Affiant's investigation:

On or about October 18, 2016, I was assigned to review registration applications that were allegedly completed by canvasser/suspect Tonya Trotter. Contained in the initial packet were approximately eight (8) suspected fraudulent applications. On October 20, 2016, I received seventeen (17) additional suspected fraudulent applications from F/Sgt. William Vann. Upon receiving them, I began to conduct a follow up investigation to determine the legitimacy of each application. I then determined through investigative means and a confession from Trotter that twenty-one (21) of the twenty-five (25) applications were fraudulent. Of the twenty-one (21) applications, six (6) were created by Trotter and thirteen (13) were obtained from a third party. There were four (4) applications that were undetermined if they were fraudulent.

On November 4, 2016, Tonya Trotter appeared at the Indiana State Police District 52 for a follow up interview. Tonya was previously interviewed at her residence, by F/Sgt. William Vann and Lt. Jeff Hearon. This interview was audio and video recorded. Trotter was read a Miranda Warning Waiver which she read and signed.

Tonya confirmed that she worked for the Indiana Voter Registration Project Organization as a canvasser. She explained that she was required to register people to vote by having them complete an Indiana Voter Registration Application. She advised that she worked numerous shifts and was required to obtain at least 10 voter registration applications during a shift in order to continue working for IVRP.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Harris Smith

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Harris Smith

Tonya advised that in order to meet her shift quota she would sometimes approach people on the street and ask them to complete voter registration applications for her using fictitious information she often provided. Tonya would then turn in the fictitious applications as legitimate voter registrations. Furthermore, Tonya admitted she would pay people for creating fictitious applications in the form of cigarettes or a small amount of change. Tonya said she could remember having about five people off the street create about 5 fictitious applications each for a total of 25 fictitious voter registrations. Tonya was presented with 25 voter registration applications bearing her name and asked if she could pick out any that she was certain were fictitiously created by someone by her request. Tonya identified 18 applications that she said were fictitious. She signed and dated each one. Trotter was asked to verify that she did not fictitiously create any voter registration applications herself and confessed that she did in fact create some applications with false information. Tonya was instructed to re-examine the 25 applications again and pick out any that she fictitiously created. Tonya selected 6 applications that were created by her. 3 of the 6 she had already claimed someone else had created. Tonya was instructed to sign, date, and place the words "I completed" on them to indicate that she was claiming them to be in her handwriting and fictitious. As a result of Tonya's confession, the 25 voter registration applications reviewed by her in this interview were submitted as evidence. Four (4) remaining registration applications were unable to determine if they were legitimate or fraudulent.

The following applications were created by Tonya Trotter.

- 1. John J. Johnson XX/XX/XXXX TX# XXX-XXX-XXXX  
XXXXXXXXXXXX Indpls, XXXXX

This address does not exist and the phone number is out of service. No records could be found pertaining to this person. (Fictitiously created)

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Harris Smith

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Harris Smith

2. Eric J. Ezell XX/XX/XXXX TX XXX-XXX-XXXX

XXXXXXXXXXXX Indpls. XXXXX

Address on Pennsylvania was not good and there was no answer by phone. The address is under 165. No records could be found pertaining to this person. (Fictitiously created)

3. Sasha Sewell XX/XX/XXXX TX# XXX-XXX-XXXX

XXXXXXXXXXXX Indpls, XXXXX

This is a bad address and the phone is disconnected. No records could be found pertaining to this person. (Fictitiously created)

4. Wyotha Tatum XX/XX/XXXX

XXXXXXXXXXXX Indpls, XXXXX

I am unable to read the address and there is no phone number. I am unable to determine the validity of this registration. No records could be found pertaining to this person. (Fictitiously created)

5. Elle L. Pack XX/XX/XXXX TX# XXX-XXX-XXXX

XXXXXXXXXXXX Indpls, XXXXX

This address does not exist and the phone number is out of service. No records could be found pertaining to this person. (Fictitiously created)

6. Andrea Griffith XX/XX/XXXX

XXXXXXXXXXXX Indpls. XXXXX

The address is bad and there is no phone number. No records could be found pertaining to this person. (Fictitiously created)

The following applications were obtained from a third party.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Harris Smith

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Harris Smith

1. D. Warren XX/XX/XXXX last four of SSN# XXXX

XXXXXXXXXXXX Indpls, XXXXX

This address is not correct and I cannot read the phone number. I am unable to determine the validity of this registration. Address is for the Indiana State Fair Grounds. (Third Party)

2. Alex A. Maxwell XX/XX/XXXX

XXXXXXXXXXXX Indpls, XXXXX

This address is not valid and the phone. No records could be found pertaining to this person. (Third Party)

3. Scotty D. Penton XX/XX/XXXX

TX#XXX-XXX-XXXX last four of SSN# XXXX

XXXXXXXXXXXX Indpls, XXXXX

This address does not exist and the phone number is out of service. No records could be found pertaining to this person. (Third Party)

4. Marlin E. Kush XX/XX/XXXX TX# XXX-XXX-XXXX

XXXXXXXXXXXX Indpls, XXXXX

This address does not exist and the phone number took voicemail, but never returned a call. No records could be found pertaining to this person. (Third Party)

5. Levi Johnson XX/XX/XXXX TX# XXX-XXX-XXXX

XXXXXXXXXXXX Indpls, XXXXX

This address does not exist and the phone number is out of service. No records could be found pertaining to this person. (Third Party)

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Harris Smith

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DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Harris Smith

6. Crissy S. Stewart No DOB or TX

XXXXXXXXXXXX Indpls, XXXXX

This address does not exist and there was no phone number. No records could be found pertaining to this person. (Third Party)

7. Ladonna P. Sanders XX/XX/XXXX

XXXXXXXXXXXX Indpls, XXXXX

This address does not exist and there is no phone number. No records could be found pertaining to this person. (Third Party)

8. Shi Scott XX/XX/XXXX

XXXXXXXXXXXX Indpls, XXXXX

This address is not good and there is no phone number. No records could be found pertaining to this person. (Third Party)

9. Tina Williamson XX/XX/XXXX

XXXXXXXXXXXX Indpls. XXXXX

The address is not good and there is no phone number. (Third Party)

10. Tasha Hubbard

XXXXXXXXXXXX Indpls XXXXX

Negative in BMV files verified (XXX) XXX-XXXX returns to Jerry W. McAllister of Indianapolis. There was a possible match listed as Natasha Hubbard in Gahanna, Ohio. I found a phone number XXX-XXX-XXXX from Ohio. A Female answered, but refused to talk to me.

Advised her to call District 52 for verification, but did not return call. (Third Party)

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Harris Smith

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Harris Smith

11. Tish L. Jaeger XX/XX/XXXX

XXXXXXXXXXXX Indpls, XXXXX

This address does not exist and there was no phone number. No records could be found pertaining to this person. (Third Party)

12. Lazaar R. Horne XX/XX/XXXX TX XXX-XXX-XXXX

XXXXXXXXXXXX Indpls. XXXXX

This address does not exist and there was no phone number. No records could be found pertaining to this person. (Third Party)

13. Sean Borne XX/XX/XXXX TX XXX-XXX-XXXX

XXXXXXXXXXXX Indpls. XXXXX

Address is not good and the phone is a business. No records could be found pertaining to this person.

14. Lianne K. Carter XX/XX/XXXX TX XXX-XXX-XXXX

XXXXXXXXXXXX Indpls. XXXXX

The address was unreadable and the phone number was disconnected. No records could be found pertaining to this person. (Third Party)

15. Kate M. Bendin XX/XX/XXXX

TX# XXX-XXX-XXXX

XXXXXXXXXXXX Indpls, XXXXX

The address was unreadable and the phone number was disconnected. No records could be found pertaining to this person. (Third Party)

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Harris Smith

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Harris Smith

16. Bruce Young XX/XX/XXXX TX#XXX-XXX-XXXX

XXXXXXXXXXXX Indpls, XXXXX

This address is incomplete, does not exist and the phone is not in service. I am unable to determine the validity of this registration. (Third Party)

I was unable to determine if the following were legitimate or fraudulent applications.

1. Tristen L. Brownlee XX/XX/XXXX TX XXX-XXX-XXXX

XXXXXXXXXXXX Indpls, XXXXX

This address does not exist and there was no phone number. No records could be found pertaining to this person.

2. Andrew L. Kimbrough XX/XX/XXXX

XXXXXXXXXXXX Indpls. XXXXX

The address is bad and there is no phone number. No records could be found pertaining to this person.

3. Sean Borne XX/XX/XXXX TX XXX-XXX-XXXX

XXXXXXXXXXXX Indpls. XXXXX

Address is not good and the phone is a business. No records could be found pertaining to this person.

4. Rigo Segoviz XX/XX/XXXX

last four of SSN# XXXX

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Harris Smith

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Harris Smith

XXXXXXXXXXXX Indpls, XXXXX

The address is unreadable and there is not phone number. No records could be found pertaining to this person.

Tonya could not provide information about criminal activity above the street level supervisors. She did provide some first names of street level supervisors that did have knowledge of fictitious voter registration applications to be Carlos (black male) Joyce (black female) and Scott (white male).

Tonya confirmed that some street level supervisors would instruct canvassers to check voter registration applications for missing information and complete the missing information themselves in order to get credit towards the canvassers daily application goal for work. Tonya said she witnessed supervisor’s complete missing information on voter registration applications.

Whoever accepts custody of a completed voter application form from a prospective voter is required to sign a “certified statement of acceptance” before filing the application with a county voter registration office. The certified statement of acceptance states that the signer affirms “under the penalties for perjury that I accepted custody of this completed application from the applicant.”

Based on the follow up investigation into each of these questionable applications, it is my belief that Tonya Trotter knowing or intentionally made or uttered a written instrument (voter registration forms) in such a manner that were purported to have been made by another person, at another time, with different provisions or by authority of one who did not give authority IC 35-43-5-2. Moreover, Tonya Trotter subscribed the name of another person to an affidavit of registration that contains false information IC 3-14-2-3 and knowingly submitted voter I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Harris Smith

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017



**Affidavit for Probable Cause**

**From:** Harris Smith

registration applications known by Tonya to be materially false, fictitious or fraudulent IC 3-14-3-1.1. Lastly, Tonya Trotter made a false, material statement under oath or affirmation knowing the statements to be false or not believing it to be true as noted in the Certified Statement of Acceptance on the application form IC 35-44.1-2-1 and submitted them as accurate and correct for processing.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Harris Smith

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AFFIANT

DATED: 6/9/2017

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION

Cause No: 49

STATE OF INDIANA )  
 )  
 vs. )  
 )

**INFORMATION**  
**COUNT I**  
**PROCURING OR SUBMISSION OF**  
**FALSE, FICTITIOUS, OR FRAUDULENT**  
**VOTER REGISTRATION APPLICATION**  
**I.C. 3-14-3-1.1(1)**  
**A LEVEL 6 FELONY**  
**COUNT II**  
**PERJURY**  
**I.C. 35-44.1-2-1(a)(1)**  
**A LEVEL 6 FELONY**

**Kiziah E. Tyler**  
**B/Male**  
**DOB 6/4/1997**

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

On or about between May 1, 2016 and November 8, 2016, Kiziah E Tyler did knowingly procure or submit voter registration applications known by Kiziah E Tyler to be materially false, fictitious or fraudulent;

COUNT II

On or about between May 1, 2016 and November 8, 2016, Kiziah E Tyler did make a false, material statement under oath or affirmation, to-wit: that he accepted custody of a completed voter registration application from an applicant; knowing said statement to be false;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44.1-2-1 that the foregoing representations are true.

/s/ Jeremy Teipen  
Affiant

June 9, 2017  
Date

**TERRY R. CURRY**  
Marion County Prosecutor  
19th Judicial Circuit

State's Witnesses:  
Jeffrey C. Hearon 5201 ISP

Harris Smith 6074 ISP  
Matt Lawrence 6464 ISP  
Jerry Gentry 6168 ISP  
William Vann 5220 ISP  
Leonard Langland 6352 ISP  
Amy S. Gaul 5934 ISP  
Jeremy C. Franklin 7554 ISP  
Scott R. Jarvis 6784 ISP  
David R. Preston 6065 ISP  
Cindy Mowery  
Ladonna Freeman  
Debra Gazvoda  
Mary Prewitt  
Michelle Cash  
Pamela McCreary  
Melissa Terry  
Jyrrell Gray  
Cassandra Tobin  
Dajia Rupert  
Fhondrece Gray

/s/ Jeremy Teipen  
Deputy Prosecuting Attorney

# AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Detective Randy Pratt swears (affirms) that:

Information set forth below in this Probable Cause Affidavit is either personally known to Affiant, information obtained from other law enforcement sources, information obtained from public records and/or information from sources otherwise identified in this Affidavit. The facts developed from this investigation are as follows and is not inclusive of all information gathered and developed as a result of this ongoing investigation:

On or about August 23, 2016, the Hendricks County Clerk, Ms. Debbie Hoskins, reported to Lieutenant Jeff Hearon of the Indiana State Police Department that during June, July, and August of 2016, a significant number of voter registration applications were received by her office from The Marion County Board of Voters Registration Office. The voter registration applications were submitted to the office by a voter registration drive organization called, "The Indiana Voter Registration Project" hereafter referred to as IVRP. Upon reviewing and vetting the applications, The Hendricks County Clerk's Office noted many inconsistencies with the submitted applications and was concerned some may be forged or fraudulent. Furthermore, Ms. Hoskins advised many of the applicants were already registered to vote so the on-file registrations were compared to the newly submitted applications. The newly submitted applications had the following characteristics: very sloppy penmanship, missing information, and/or contained erroneous data, such as but not limited to, the following: Applicant's printed name not matching applicant's signature, missing applicant telephone number, and applicant address not matching applicant county of residence.

After learning this information, Lt. Hearon scheduled a meeting with Indiana Secretary of State Connie Lawson to discuss these concerns and inquire about the Indiana Voter Registration

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Randy Pratt

Project (IVRP) and if they were a registered entity. Secretary Lawson and her staff were unaware of this group and had not received any complaints.

During the subsequent Indiana State Police investigation on September 2, 2016, Lt. Jeff Hearon spoke with Ms. Cindy Mowery and Ms. Ladonna Freeman, Co-Directors of the Marion County Board of Voters Registration. They reported that their office has received thousands of voter registration applications from "The Indiana Voter Registration Project (IVRP)." According to the Ms. Mowery and Ms. Freeman, several of the voter registration applications were incomplete and when compared to on-file voter registrations for the same applicant's their signatures did not match. This is consistent with the original findings by the Hendricks County Clerk's Office.

On September 6, 2016, Indiana State Police detectives went to the Marion County Board of Voters Registration to conduct follow up interviews with the directors. Detectives learned that the IVRP had submitted 27,377 voter applications. These applications were submitted by Holly Burke and another unknown male named Karim (employees of the IVRP). Director Cindy Mowery became suspicious of the group and sent an attorney to the IVRP office headquarters, located at 2425 N. Meridian Street Indianapolis, Indiana. After observing the location, the attorney expressed concern about the legitimacy of the organization and conveyed those concerns to Director Mowery. While detectives were speaking with the directors, personnel informed the detectives that Holly Burke was currently dropping off voter registration applications. Lt. Hearon and F/Sgt. William Vann conducted an investigative interview with Burke at the clerk's office. The following information was learned through the interview: Burke conveyed that she was a community organizer with the Indiana Voter Registration Project (IVRP), a non-partisan voter registration drive. Burke stated that she receives her paychecks from a company identified as Block by Block. Burke stated the group targeted areas that were

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/s/ Randy Pratt

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AFFIANT

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**From:** Detective Randy Pratt

historically under represented or disenfranchised in order to encourage people to register to vote. This was achieved by hiring part time employees to target the identified areas and attempt to register people to vote. These employees would be paid \$50.00 per five hour shift. That same day, detectives traveled to the IVRP office at 2425 N. Meridian Street Indianapolis, IN. Upon arrival, detectives observed that the business did not have any signs on the door to signify an office for IVRP. A sign placed on the door instructed patrons to enter through the rear alley door. Detectives proceeded to the rear entry and noted minimal furnishings consisting of folding table and chairs. Detectives met with IVRP supervisor Ryan Garner. Garner provided additional details of IVRP. Garner stated that the IVRP maintains offices in Indianapolis and Gary Indiana. Detectives later confirmed the alleged office in Gary was actually a vacant lot. Garner stated that IVRP worked for an organization called Rebuild USA as well as a group of Washington DC based attorney's. Garner declined to provide additional details such as who his supervisors were, if they were a registered political action committee or a not for profit registered with the State of Indiana. When detectives questioned Garner about the concerns of the registration applications, Garner responded by saying that IVRP attempts to verify the accuracy of the information but IVRP is limited on the ability to fully vet them due to the deadline for submission.

Upon reviewing several suspected voter registration applications from the IVRP and determining several contained missing, erroneous or fraudulent information, detectives met with personnel from the Indiana Secretary of State's Office to relay the concerns. As a result, Secretary Connie Lawson distributed a public service announcement for the general public to verify their voter registration records as well as a second letter directing all clerk's offices in the State of Indiana to carefully review applications received by the IVRP. As detectives began to conduct follow up investigation into the questionable voter registration applications, detectives learned the following information:

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Randy Pratt

- \*Employees of IVRP were pressured to obtain 10 applications (quota) per shift or risk termination.
- \*Employees of IVRP were advised by IVRP supervisors to get their quota by any means necessary.
- \*Employees of IVRP would duplicate information from actual voter registration file for new applications to meet quota.
- \*Employees of IVRP would commonly not sign the applications and provide applications to other employees who may not have obtained enough applications during their shifts.

Furthermore, Lt. Jeff Hearon applied for a search warrant for the offices of the IVRP on October 3, 2016. On October 4, 2016, detectives with the Indiana State Police executed a search warrant on the IVRP offices. During the course of the search warrant and subsequent review of information, detectives found evidence of 34,000 voter registration applications encompassing 56 Indiana counties. Furthermore, many of the applications had notations on them that submitted applications were for juveniles, not United States citizens, people who lived out of state, incorrect telephone numbers, incorrect zip codes, invalid or non-existent addresses, notations that real voters denied making application when contacted, notations for multiple registrations. Additionally, detectives recovered multiple voter registration applications that had not been submitted in violation of IC 3-7-32-8. Holiday Burke, Verification Director from the IVRP, was informed of this violation and that an affidavit would need to be submitted and tendered to the respective clerk's office for each application that was incomplete or suspected of being fraudulent or forged.

As a result of these findings, Indiana State Police Detectives initiated an investigation into the veracity of numerous voter registration applications that contained missing, incomplete, and/or

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/s/ Randy Pratt

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Randy Pratt

erroneous applicant information and other problems as noted in the aforementioned investigation. The following facts are the results of Affiant's investigation:

On or about September 27, 2016, I was assigned to review voter registration applications which were allegedly completed by IVRP Canvasser Kiziah Tyler. Contained in the packet were 8 suspected fraudulent voter registration applications certified by Kiziah Tyler. I examined the applications and noticed several issues such as invalid phone numbers, fictitious addresses and misspelled words.

On October 18, 2016, Lieutenant Hearon and I went to 6102 Brockworth Drive, Apartment A, Indianapolis, Indiana to attempt to locate Kiziah Tyler. According to his mother, Cassandra, he was at school. Cassandra confirmed to us that Kiziah worked for the Indiana Voter Registration Project Organization for one day during the summer.

On October 20, 2016, I once again stopped by Kiziah Tyler's apartment. I spoke with his brother who stated that Kiziah was not at home. I conducted an approximate half hour of surveillance in the parking lot until Kiziah's mother Cassandra arrived at the apartment. I spoke with her about possibly talking to her son. She advised me that Kiziah was home and proceeded to invite me into the apartment to speak with him. Because their dog was barking non-stop, I asked Cassandra and Kiziah if we could talk in my car. They both agreed. On our way out to my car, I informed Kiziah that he was free to go at any time, and that he was not obligated to talk with me. He agreed to talk with me and was very cooperative.

During a recorded interview, Kiziah Tyler told me that he worked for IVRP for one day in July 2016. He was to be paid \$75.00 for (10) completed and signed IVRP registration forms. He explained that an IVRP driver picked him up in a mini bus and dropped him off at a location, I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017



## Affidavit for Probable Cause

**From:** Detective Randy Pratt

unknown to him, somewhere in Indianapolis. Kiziah stated that it was easier for him to just contact (10) friends and/or family members, via phone, and fill out their information on the forms. He admitted to filling out and signing (8) friends' and family members' names onto the voter registration application forms. He also stated that all of the people exist, but some of the addresses were fictitious. Below is a list of voter registration applications submitted by Kiziah Tyler.

1. Fhordrece Gray; Kiziah's former girlfriend; previously lived with Kiziah; Ms. Gray signed her name on the form.
  
2. James Davidson; Kiziah's girlfriends' brother; address and phone # not valid; form not signed by Kiziah at the bottom right. Signature of Mr. Davidson looks to be comparable to Kiziah's handwriting, likely to be forged by Kiziah; unable to contact Mr. Davidson.
  
3. Mellissa Terry; Kiziah's girlfriends' mother; Kiziah forged signature of Ms. Terry; she is aware of the forgery and is very upset about it.
  
4. Jyrrell Gray; Kiziah's girlfriends' brother, and son of Ms. Terry; valid name and address; Kiziah signed his name as the canvasser and forged Mr. Gray's signature at bottom left.
  
5. Tashaa Block; friend of Kiziah; address not valid, no phone # listed; Kiziah signed his name as the canvasser and forged Tashaa's name onto the form.
  
6. Dajia Ruperp; friend of Kiziah's girlfriend; address is fictitious, no phone # listed; Kiziah signed his name as the canvasser and as well, looks to have forged Dajia's signature.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Detective Randy Pratt

7. Tasha Buford; friend of Kiziah's girlfriend; address is fictitious, no phone # listed; Kiziah signed his name as the canvasser. Cannot see signature of Tasha Buford.

8. Cassanda Tobin; address not legible, no phone # listed; Kiziah signed his name as the canvasser, and as well, looks to have forged Cassanda's name.

Mr. Tyler was cooperative during the interview and admitted he felt pressure to get (10) completed registration forms turned in to IVRP. He stated that he really didn't care what he wrote down on the forms, just that he could get the \$75.00 payment. Mr. Tyler is unaware of the names of the people that he was working for with the IVRP.

On October 20<sup>th</sup>, 2016, I attempted contact with Mellissa Terry for the 2nd time. She is the mother of Jyrrell Gray and Fhordrece Gray, former girlfriend of Kiziah Tyler. After I explained my reason for calling, she stated that she was well aware of what was going on. She stated that she had contacted Kiziah after my first contact with her, telling him that she was upset with him for signing her name to the registration form, and for signing her son's name as well. She also stated that her daughter, Fhordrece, probably signed her own name to the registration form, not Kiziah. I have tried several times to contact Fhordrece with no success. Because of her mother, Mellissa Terry, Fhordrece is most certainly aware of my attempts to make contact with her. This conversation with Ms. Terry was recorded. Ms. Terry also stated that Kiziah signed up a lot of people, filling in all the information, and in some cases, forged their names to complete the form.

On January 6<sup>th</sup>, 2017, I contacted Kiziah Tyler, requesting to meet with him to go over each of his voter registration forms. I met with him at his apartment located at 6102 Brockworth Drive, Indianapolis. I informed Kiziah that he was free to leave or to stop the interview at any time. He was cooperative and truthful. I presented to Kiziah, each voter registration form that he had filled I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Detective Randy Pratt

out when he had worked for IVRP in July of 2016. He admitted that he had completed the information on each of the registration forms via phone.

Kiziah also stated that he had not been given permission by any of the applicants, except for one, to sign their names on the forms. Therefore, he admitted to forging all of the applicants' names onto the forms, except for Tashaa Block who had given him permission, via phone, to sign her registration form. Below is a list of the applicants who had not given him permission to sign, but did in fact, by his own admission, forge each of their names onto the forms.

1. Jyrrell Gray, XXXXXXXXXXXX, Indianapolis; valid name and address. No permission given to forge his signature on registration form.
2. Cassanda Tobin, XXXXXXXXXXXX, Indianapolis; valid name, unable to gain entry into vestibule to make contact, no phone # listed. No permission given to forge her signature on registration form.
3. Dajia Ruperp, 3511 Star Magnolia, Apt. B, Indianapolis; valid name, fictitious address, no phone # listed. No permission given to forge her signature on registration form.
4. Margaret Smith, XXXXXXXXXXXX, Indianapolis; valid name, fictitious address, no phone # listed. No permission given to forge her signature on registration form.
5. Mellissa Terry, XXXXXXXXXXXX, Indianapolis; valid name and address. No permission given to forge her signature on registration form.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017\_\_\_\_\_

**Affidavit for Probable Cause**

**From:** Detective Randy Pratt

6. Fhondrece Gray, XXXXXXXXXXXX, Indianapolis; valid name and address. No permission given to forge her signature on registration form.

7. Tasha Buford, XXXXXXXXXXXX, Indianapolis; valid name, fictitious address, no phone # listed. No permission given to forge her signature on registration form.

8. Nesha Upshaw, XXXXXXXXXXXX, Indianapolis; valid name, fictitious address, no phone # listed. No permission given to forge her signature on registration form.

9. James Davidson, XXXXXXXXXXXX, Indianapolis; valid name, fictitious address. No permission given to forge his signature on registration form.

Whoever accepts custody of a completed voter application form from a prospective voter is required to sign a “certified statement of acceptance” before filing the application with a county voter registration office. The certified statement of acceptance states that the signer affirms “under the penalties for perjury that I accepted custody of this completed application from the applicant.”

Based on my follow up investigation into each of these questionable applications, it is my belief that Kiziah Tyler, knowingly or intentionally, made or uttered, a written instrument (voter registration forms) in such a manner that it was purported to have been made by another person, at another time, with different provisions, or by authority of one who did not give authority, IC 35-43-5-2. Moreover, Kiziah Tyler subscribed the name of another person to an affidavit of registration that contains false information, IC 3-14-2-3, and knowingly submitted voter registration applications, known by Kiziah Tyler, to be materially false, fictitious or fraudulent, IC 3-14-3-1.1. Lastly, Kiziah Tyler made a false material statement under oath or affirmation, I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

\_\_\_\_\_  
AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Detective Randy Pratt

knowing the statements to be false, or not believing it to be true, as noted in the Certified Statement of Acceptance on the application form, IC 35-44.1-2-1, and submitted the registration forms, as being accurate, for processing.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Randy Pratt

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AFFIANT

DATED: 6/9/2017

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION

Cause No: 49

STATE OF INDIANA )  
 )  
 vs. )  
 )

**INFORMATION**  
**COUNT I**  
**PROCURING OR SUBMISSION OF**  
**FALSE, FICTITIOUS, OR FRAUDULENT**  
**VOTER REGISTRATION APPLICATION**  
**I.C. 3-14-3-1.1(1)**  
**A LEVEL 6 FELONY**  
**COUNT II**  
**PERJURY**  
**I.C. 35-44.1-2-1(a)(1)**  
**A LEVEL 6 FELONY**

**Jasmin L Young**  
**B/Female**  
**DOB 5/7/1985**

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

On or about between May 1, 2016 and November 8, 2016, Jasmin L Young did knowingly procure or submit voter registration applications known by Jasmin L Young to be materially false, fictitious or fraudulent;

COUNT II

On or about between May 1, 2016 and November 8, 2016, Jasmin L Young did make a false, material statement under oath or affirmation, to-wit: that she accepted custody of a completed voter registration application from an applicant; knowing said statement to be false;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44.1-2-1 that the foregoing representations are true.

/s/ Jeremy Teipen  
Affiant

June 9, 2017  
Date

**TERRY R. CURRY**  
Marion County Prosecutor  
19th Judicial Circuit

State's Witnesses:  
Jeffrey C. Hearon 5201 ISP

Matt Lawrence 6464 ISP  
Randy Pratt 5536 ISP  
Jerry Gentry 6168 ISP  
William Vann 5220 ISP  
Leonard Langland 6352 ISP  
Amy S. Gaul 5934 ISP  
Jeremy C. Franklin 7554 ISP  
Scott R. Jarvis 6784 ISP  
David R. Preston 6065 ISP  
Cindy Mowery  
Ladonna Freeman  
Debra Gazvoda  
Mary Prewitt  
Michelle Cash  
Pamela McCreary  
Robert Clark  
Brandon Hatcher

/s/ Jeremy Teipen  
Deputy Prosecuting Attorney

# AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Detective Matthew Lawrence, Indiana State Police, swears (affirms) that:

Information set forth below in this Probable Cause Affidavit is either personally known to Affiant, information obtained from other law enforcement sources, information obtained from public records and/or information from sources otherwise identified in this Affidavit. The facts developed from this investigation are as follows and are not inclusive of all information gathered and developed as a result of this ongoing investigation:

On or about August 23, 2016, the Hendricks County Clerk, Ms. Debbie Hoskins, reported to Lieutenant Jeff Hearon of the Indiana State Police Department that during June, July, and August of 2016, a significant number of voter registration applications were received by her office from The Marion County Board of Voters Registration Office. The voter registration applications were submitted to their office by a voter registration drive organization called "The Indiana Voter Registration Project" hereafter referred to as IVRP. Upon reviewing and vetting the applications, The Hendricks County Clerk's Office noted many inconsistencies with the submitted applications and was concerned some may be forged or fraudulent. Furthermore, Ms. Hoskins advised many of the applicants were already registered to vote so the on-file registrations were compared to the newly submitted applications. The newly submitted applications had the following characteristics: very sloppy penmanship, missing information, and/or contained erroneous data, such as, but not limited to the following: Applicants' printed name not matching applicants' signature, missing applicant telephone number and applicant address not matching applicant county of residence.

After learning this information, Lt. Hearon scheduled a meeting with Indiana Secretary of State Connie Lawson to discuss these concerns and inquire about the Indiana Voter Registration

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Matthew Lawrence

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AFFIANT

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## Affidavit for Probable Cause

**From:** Detective Matthew Lawrence

Project (IVRP) and if they were a registered entity. Secretary Lawson and her staff were unaware of this organization and had not received any complaints.

During the subsequent Indiana State Police investigation on September 2, 2016, Lt. Jeff Hearon spoke with Ms. Cindy Mowery and Ms. Ladonna Freeman, Co-Directors of the Marion County Board of Voters Registration. They reported that their office has received thousands of voter registration applications from "The Indiana Voter Registration Project (IVRP)." According to Ms. Mowery and Ms. Freeman, several of the voter registration applications were incomplete and when compared to on-file voter registrations for the same applicant's their signatures did not match. This is consistent with the original findings by the Hendricks County Clerk's Office.

On September 6, 2016, Indiana State Police detectives went to the Marion County Board of Voters Registration to conduct follow up interviews with the directors. Detectives learned that the IVRP had submitted 27,377 voter applications. These applications were submitted by Holly Burke and another unknown male named Karim (employees of the IVRP). Director Cindy Mowery became suspicious of the group and sent an attorney to the IVRP office headquarters located at 2425 N. Meridian Street Indianapolis, Indiana. After observing the location, the attorney expressed concern about the legitimacy of the organization and conveyed those concerns to the Director Mowery. While detectives were speaking with the directors, personnel informed the detectives that Holly Burke was currently dropping off voter registration applications. Lt. Hearon and F/Sgt. William Vann conducted an investigative interview with Burke at the clerk's office. The following information was learned through the interview: Burke conveyed that she was a community organizer with the Indiana Voter Registration Project (IVRP), a non-partisan voter registration drive. Burke stated that she receives her paychecks from a company identified as Block by Block. Burke stated the group targeted areas that were historically under represented or disenfranchised in order to encourage people to register to vote. I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Matthew Lawrence

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Matthew Lawrence

This was achieved by hiring part time employees to target the identified areas and attempt to register people to vote. These employees would be paid \$50.00 per five hour shift. That same day, detectives traveled to the IVRP office at 2425 N. Meridian Street Indianapolis, IN. Upon arrival, detectives observed that the business did not have any signs on the door to signify an office for IVRP. A sign placed on the door instructed patrons to enter through the rear alley door. Detectives proceeded to the rear entry and noted minimal furnishings, which consisted of folding tables and chairs. Detectives met with IVRP supervisor Ryan Garner. Garner provided additional details of IVRP. Garner stated that the IVRP maintains offices in Indianapolis and Gary Indiana. Detectives later confirmed the alleged office location in Gary was actually a vacant lot. Garner stated that IVRP worked for an organization called Rebuild USA, as well as a group of Washington DC based attorneys. Garner declined to provide additional details, such as, who his supervisors were, if they were a registered political action committee or a not-for-profit organization registered with the State of Indiana. When detectives questioned Garner about the concerns of the registration applications, Garner responded by saying that IVRP attempts to verify the accuracy of the information, but IVRP is limited on the ability to fully vet them due to the deadline for submission.

Upon reviewing several suspected voter registration applications from the IVRP and determining several contained missing, erroneous or fraudulent information, detectives met with personnel from the Indiana Secretary of State's Office to relay the concerns. As a result, Secretary Connie Lawson distributed a public service announcement for the general public to verify their voter registration records, as well as a second letter directing all clerk's offices in the State of Indiana to carefully review applications received by the IVRP. As detectives began to conduct follow up investigation into the questionable voter registration applications, detectives learned the following information:

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Matthew Lawrence

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Matthew Lawrence

\*Employees of IVRP were pressured to obtain 10 applications (quota) per shift or risk termination.

\*Employees of IVRP were advised by IVRP supervisors to get their quota by any means necessary.

\*Employees of IVRP would duplicate information from actual voter registration files onto new applications to meet quota.

\*Employees of IVRP would commonly not sign the applications and provide those applications to other employees who may not have obtained their quota of applications during their shifts.

Furthermore, Lt. Jeff Hearon applied for a search warrant for the offices of the IVRP on October 3, 2016. On October 4, 2016, detectives with the Indiana State Police executed a search warrant on the IVRP offices. During the course of the search warrant and subsequent review of information, detectives found evidence of 34,000 voter registration applications encompassing 56 Indiana counties. Furthermore, many of the applications had notations on them that the submitted applications were for juveniles, not United States citizens, people who lived out of state, incorrect telephone numbers, incorrect zip codes, invalid or non-existent addresses, notations that real voters denied making application when contacted and notations for multiple registrations. Additionally, detectives recovered multiple voter registration applications that had not been submitted, which is in violation of IC 3-7-32-8. Holiday Burke, Verification Director from the IVRP, was informed of this violation and that an affidavit would need to be submitted and tendered to the respective clerk's office for each application that was incomplete or suspected of being fraudulent or forged.

As a result of these findings, Indiana State Police Detectives initiated an investigation into the veracity of numerous voter registration applications that contained missing, incomplete, and/or

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Matthew Lawrence

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AFFIANT

DATED: 6/9/2017

**Affidavit for Probable Cause**

**From:** Detective Matthew Lawrence

erroneous applicant information and other problems as noted in the aforementioned investigation. The following facts are the results of Affiant's investigation:

During the course of this investigation, I reviewed multiple voter registration forms with, what appeared to me to be, the name Jasmin Young, along with a signature and other information listed in the 'Certified Statement of Acceptance' (box 15) of the voter registration form. Note - In box 15, reads the following statement; "I affirm under the penalties for perjury that I accepted custody of this completed application from the applicant on (insert date): \_\_/\_\_/20\_\_".

One of these voter registration forms list what appeared to me to be the name, Brandon Hatcher. I also noticed that there was not a signature in the 'Signature of Applicant' box of the aforesaid form. On October 27, 2016, I made telephone contact with a person who said he was Brandon Hatcher. Hatcher said that he has not recently filled out a voter registration form. Elaborating, Hatcher said that he's not had to register to vote in the last eight years because he has been at the same address. During our phone conversation, Hatcher told me his date of birth. The date of birth Hatcher gave me matched the date of birth listed on the copy of the voter registration form in question.

On November 2, 2016, Detective Graves and I drove to XXXXXXXXXXXX Indianapolis, IN. A female that I recognized to be Jasmin Young (via a BMV photo) DOB: XX/XX/XXXX answered the door. The aforesaid female also identified herself verbally as Jasmin Leandra Young, DOB: XX/XX/XXXX. I told Young our purpose for wanting to speak with her. Young agreed to a conversation. When asked if she used to work for the Indiana Voter Registration Project, Young responded in the affirmative. Young's description of her position fit that of a canvasser. Young said that she worked during the summer, speculating June/July.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Matthew Lawrence

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AFFIANT

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## Affidavit for Probable Cause

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Initially, it appeared as though Young denied any wrong doing. However, later in the conversation, Young said that if got to be the time to which she was about to reunite with Indiana Voter Registration Project personnel and she only had one registration then, "I'm gonna write like two..two or three names down". Young said that names were of people she knew, such as family members, and that she would re-register them to vote. I asked Young if she had the family member's permission to do that and she replied, not all the time.

I asked Young how many times she filled out a voter registration form without someone's permission, she speculated three to five. I asked Young if she would sign "their" name (Signature of Applicant) without permission. Young said that she would never sign their name. I asked Young for some names of the people she completed registration forms. Two of the names that Young provided were Brandon Hatcher and Robert Clark (who she said was her brother). I essentially asked Young if she told these people (referring to the people whom she named) what she had done. Young said that she did afterwards, but it was "after the fact". Continuing, Young said that she told her brother, Robert Clark, that she registered him to vote. Young said that he asked her (Young) why she did that because he was already registered to vote. Young told her brother it was because she needed to get the " number" (During our conversation, Young mentioned registrations being called numbers). I asked Young what her brother said. Young said something to the extent of, her brother told her that she needed to stop doing that job and if the police came to look for her, who would take care of her kids.

During the course of our conversation, I asked Young who Hatcher was to her; she said that Hatcher was her cousin. I then went over a copy of a voter registration form with Young that listed, what appeared to me to be, the name Brandon Hatcher and contained the date: 07/14/2016. When asked, Young acknowledged that Brandon Hatcher's name was in her handwriting. I also asked Young what another portion of the form said; she read it aloud and I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Matthew Lawrence

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AFFIANT

DATED: 6/9/2017

## Affidavit for Probable Cause

**From:** Detective Matthew Lawrence

acknowledged the handwriting as her handwriting. Young also acknowledged the handwriting in the date of birth portion of the form as her handwriting. Note -the date of birth on the aforesaid form list the actual date of birth for Hatcher. Young also commented that she remembered all her family members' birthdays. Young also acknowledged that the signature in the 'CERTIFIED STATEMENT OF ACCEPTANCE' was hers. By doing this, Young made a false, material statement under oath or affirmation, knowing the statement to be false or not believing it to be true in violation of IC 35-44.1-2-1. The 'Signature of Applicant' was blank on this form. Essentially, Young acknowledged that she did not have Hatcher's permission to complete the form. This is contrary to IC 3-14-2-3 for subscribing the name of another person to an affidavit of registration without writing on it the person's own name and address as an attesting witness. When asked if she turned in Brandon's (Hatcher) form, along with other family members, into the Indiana Voter Registration Project, Young replied yes. I also asked Young if she submitted them (forms) in pretending that she actually had them sign up; she replied in the affirmative violating IC 3-14-3-1.1.

Whomever accepts custody of a completed voter application form from a prospective voter is required to sign a “certified statement of acceptance” before filing the application with a county voter registration office. The certified statement of acceptance states that the signer affirms “under the penalties for perjury that I accepted custody of this completed application from the applicant.”

During the course of this investigation, I obtained a copy a voter registration form which listed the name Robert Clark, a date of birth and a signature in the 'Signature of Applicant' box dated 7-12-16. The date of birth listed on this form list the actual date of birth for Clark. The aforesaid form also contained the following in the 'CERTIFIED STATEMENT OF ACCEPTANCE' box; a name -appeared to me to be Jasmin Young, an address and a signature. I noticed that the I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Matthew Lawrence

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AFFIANT

DATED: 6/9/2017

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**From:** Detective Matthew Lawrence

signature and handwriting in the 'CERTIFIED STATEMENT OF ACCEPTANCE' box of the aforesaid form resembled that of the signature and handwriting in the 'CERTIFIED STATEMENT OF ACCEPTANCE' of the Hatcher form. On November 22, 2016, I spoke with Clark via telephone and then met with him in person. Clark identified Jasmin Young as his sister. I also showed Clark a copy of the aforesaid voter registration form. I asked Clark if any handwriting of the aforesaid form was his; he replied, no. I asked Clark if the signature in box 14 (Signature of Applicant) was his; he replied no. When asked, Clark said that he did not fill out the form nor did he sign it. I then asked Clark if he gave Jasmin Young permission to fill out the aforesaid form; he replied no. I asked if he gave Jasmin Young permission to sign his name to the aforesaid form; he replied, no. Based on this information, I believe Young made a false, material statement under oath or affirmation, knowing the statement to be false or not believing it to be true in violation of IC 35-44.1-2-1. Based on my investigation and conversation with Young, I concluded that this application was submitted to the Indiana Voter Registration Project and subsequently to the Marion County Clerk's Office. Young's actions are contrary to IC 3-14-2-3 for subscribing the name of another person to an affidavit of registration without writing on it the person's own name and address as an attesting witness. Young submitted the form violating IC 3-14-3-1.1.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Matthew Lawrence

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AFFIANT

DATED: 6/9/2017