

INDICTMENT

THE STATE OF TEXAS

VS.

BRENDA DAUGHTREY SCHROEDER

DOB: 12/07/1950
SID: TX 50236809
Bond \$ 500,000

- Count I: THEFT BY A PUBLIC SERVANT (AGGREGATED), § 31.03(a) P.C.
DEGREE: 1ST DEGREE, § 31.03(f)(2) P.C.**
- Count II: FALSE STATEMENT TO OBTAIN PROPERTY OR CREDIT,
AGGREGATED, §32.32, Texas Penal Code
DEGREE: 1ST DEGREE, § 32.32 (c)(7) P.C.**
- Count III: ENGAGING IN ORGANIZED CRIMINAL ACTIVITY
DEGREE: 1ST DEGREE, § 71.02 P.C.**
-

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

THE GRAND JURY, for the County of Bastrop, State of Texas, duly selected, impaneled, sworn, charged, and organized as such at the January Term, A.D., 2013 of the 21st Judicial District Court for said County, upon their oaths present in and to said Court at said term that:

COUNT I

BRENDA DAUGHTREY SCHROEDER, hereinafter styled Defendant, on or about and between January 1, 2008 and May 31, 2012 and before the presentment of this indictment, in the County and State aforesaid, did then and there unlawfully appropriate, by acquiring or otherwise exercising control over property by deception, to wit: United States Currency, described more particularly as:

1. Check Number 14431, issued November 1, 2008, to Beverly Daughtrey for \$2,769 from the City of Smithville Housing Authority, the owner thereof; and

FILED 11:45 AM
DATE 3/1/2013
Sara Leuck
District Clerk Bastrop County 1

2. Check Number 14455 issued December 1, 2008, to Beverly Daughtrey for \$2,769 from the City of Smithville Housing Authority, the owner thereof; and
3. Check Number 14482 issued January 1, 2009, to Beverly Daughtrey for \$2,769 from the City of Smithville Housing Authority, the owner thereof; and
4. Check Number 14506 issued February 1, 2009, to Beverly Daughtrey for \$2,784 from the City of Smithville Housing Authority, the owner thereof; and
5. Check Number 14530 issued March 1, 2009, to Beverly Daughtrey for \$2,651 from City of Smithville Housing Authority, the owner thereof; and
6. Check Number 14554 issued April 1, 2009, to Beverly Daughtrey for \$2,658 from the City of Smithville Housing Authority the owner thereof; and
7. Check Number 14596 issued May 1, 2009, to Beverly Daughtrey for \$2,658 from the City of Smithville Housing Authority, the owner thereof; and
8. Check Number 14605 issued June 1, 2009, to Beverly Daughtrey for \$2,601 from the City of Smithville Housing Authority the owner thereof; and
9. Check Number 14629 issued July 1, 2009 to Beverly Daughtrey for \$2,607 from the City of Smithville Housing Authority the owner thereof; and
10. Check Number 14654 issued August 1, 2009 to Beverly Daughtrey for \$2,607 from the City of Smithville Housing Authority the owner thereof; and
11. Check Number 14678 issued September 1, 2009 to Beverly Daughtrey for \$2,607 from the City of Smithville Housing Authority the owner thereof; and
12. Check Number 14702 issued October 1, 2009 to Beverly Daughtrey for \$2,607 from the City of Smithville Housing Authority the owner thereof; and
13. Check Number 14724 issued November 1, 2009 to Beverly Daughtrey for \$2,607 from the City of Smithville Housing Authority the owner thereof; and
14. Check Number 14745 issued December 1, 2009 to Beverly Daughtrey for \$2,607 from the City of Smithville Housing Authority the owner thereof; and
15. Check Number 14768 issued January 1, 2010, to Beverly Daughtrey for \$2,807 from the City of Smithville Housing Authority the owner thereof; and
16. Check Number 14794 issued February 1, 2010, to Beverly Daughtrey for \$2,872 from the City of Smithville Housing Authority the owner thereof; and

17. Check Number 14817 issued March 1, 2010, to Beverly Daughtrey for \$2,816 from the City of Smithville Housing Authority the owner thereof; and
18. Check Number 14840 issued April 1, 2010, to Beverly Daughtrey for \$2,816 from the City of Smithville Housing Authority, the owner thereof; and
19. Check Number 14864 issued May 1, 2010, to Beverly Daughtrey for \$2,816 from the City of Smithville Housing Authority the owner thereof; and
20. Check Number 14885 issued June 1, 2010, to Beverly Daughtrey for \$2,833 from the City of Smithville Housing Authority the owner thereof; and
21. Check Number 14932 issued August 1, 2010, to Brenda Daughtrey for \$2,289 from the City of Smithville Housing Authority, the owner thereof; and
22. Check Number 14983 issued October 1, 2010, to Brenda Daughtrey for \$2,319 from the City of Smithville Housing Authority the owner thereof; and
23. Check Number 15007 issued November 1, 2010, to Brenda Daughtrey for \$2,656 from the City of Smithville Housing Authority the owner thereof; and
24. Check Number 15032 issued December 1, 2010, to Brenda Daughtrey for \$2,656 from the Salvation Army the owner thereof; and
25. Check Number 15056 issued January 1, 2011, to Brenda Daughtrey for \$2,658 from the City of Smithville Housing Authority the owner thereof; and
26. Check Number 15082 issued February 1, 2011, to Brenda Daughtrey for \$1,710 from the City of Smithville Housing Authority the owner thereof; and
27. Check Number 15100 issued January 31, 2011, to Brenda Daughtrey for \$1,000 from the City of Smithville Housing Authority the owner thereof; and
28. Check Number 15109 issued March 1, 2011, to Brenda Daughtrey for \$2,710 from the City of Smithville Housing Authority the owner thereof;
29. Check Number 15134 issued April 1, 2011, to Brenda Daughtrey for \$2,242 from the City of Smithville Housing Authority the owner thereof;
30. Check Number 15158 issued May 1, 2011, to Brenda Daughtrey for \$2,242 from the City of Smithville Housing Authority the owner thereof;
31. Check Number 15184 issued June 1, 2011, to Brenda Daughtrey for \$2,252 from the City of Smithville Housing Authority the owner thereof;

32. Check Number 15208 issued July 1, 2011, to Brenda Daughtrey for \$2,252 from the City of Smithville Housing Authority the owner thereof;
33. Check Number 15233 issued August 1, 2011, to Brenda Daughtrey for \$2,252 from the City of Smithville Housing Authority the owner thereof;
34. Check Number 15257 issued September 1, 2011, to Brenda Daughtrey for \$2,252 from the City of Smithville Housing Authority the owner thereof;
35. Check Number 15284 issued October 1, 2011, to Brenda Daughtrey for \$2,252 from the City of Smithville Housing Authority the owner thereof;
36. Check Number 15309 issued November 1, 2011, to Brenda Daughtrey for \$2,252 from the City of Smithville Housing Authority the owner thereof;
37. Check Number 15336 issued December 1, 2011, to Brenda Daughtrey for \$2,252 from the City of Smithville Housing Authority the owner thereof;
38. Check Number 15363 issued January 1, 2012, to Brenda Daughtrey for \$2,252 from the City of Smithville Housing Authority the owner thereof;
39. Check Number 15390 issued February 1, 2012, to Brenda Daughtrey for \$2,232 from the City of Smithville Housing Authority the owner thereof;
40. Check Number 15417 issued March 1, 2012, to Brenda Daughtrey for \$2,764 from the City of Smithville Housing Authority the owner thereof;
41. Check Number 14925 issued July 6, 2010, to Brenda F. Daughtrey for \$2,833 from the City of Smithville Housing Authority the owner thereof;
42. Check Number 14956 issued September 1, 2010, to Brenda F. Daughtrey for \$2,289 from the City of Smithville Housing Authority the owner thereof;
43. Check Number 14910 issued July 1, 2010, to Elroy Wisian for \$900 from the City of Smithville Housing Authority the owner thereof;
44. Check Number 14916 issued August 1, 2010, to Elroy Wisian for \$1,010 from the City of Smithville Housing Authority the owner thereof;
45. Check Number 14970 issued September 1, 2010, to Elroy Wisian for \$1,010 from the City of Smithville Housing Authority the owner thereof;
46. Check Number 14997 issued October 1, 2010, to Elroy Wisian for \$1,310 from the City of Smithville Housing Authority the owner thereof;

47. Check Number 15022 issued November 1, 2010, to Elroy Wisian for \$1,310 from the City of Smithville Housing Authority the owner thereof;
48. Check Number 15046 issued December 1, 2010, to Elroy Wisian for \$1,310 from the City of Smithville Housing Authority the owner thereof;
49. Check Number 15072 issued January 1, 2011, to Elroy Wisian for \$1,310 from the City of Smithville Housing Authority the owner thereof;
50. Check Number 15098 issued February 1, 2011, to Elroy Wisian for \$1,298 from the City of Smithville Housing Authority the owner thereof;
51. Check Number 15124 issued March 1, 2011, to Elroy Wisian for \$1,298 from the City of Smithville Housing Authority the owner thereof;
52. Check Number 15149 issued April 1, 2011, to Elroy Wisian for \$1,298 from the City of Smithville Housing Authority the owner thereof;
53. Check Number 15173 issued May 1, 2011, to Elroy Wisian for \$1,298 from the City of Smithville Housing Authority the owner thereof;
54. Check Number 15312 issued November 1, 2011, to Ernest Gray for \$913 from the City of Smithville Housing Authority the owner thereof;
55. Check Number 15339 issued December 1, 2011, to Ernest Gray for \$913 from the City of Smithville Housing Authority the owner thereof;
56. Check Number 15366 issued January 1, 2012, to Ernest Gray for \$913 from the City of Smithville Housing Authority the owner thereof;
57. Check Number 15393 issued February 1, 2012, to Ernest Gray for \$913 from the City of Smithville Housing Authority the owner thereof;
58. Check Number 15420 issued March 1, 2012, to Ernest Gray for \$913 from the City of Smithville Housing Authority the owner thereof;
59. Check Number 15446 issued April 1, 2012, to Ernest Gray for \$913 from the City of Smithville Housing Authority the owner thereof;
60. Check Number 15476 issued May 1, 2012, to Ernest Gray for \$913 from the City of Smithville Housing Authority the owner thereof;
61. Check Number 14902 issued June 25, 2010, to Joshua Bennett for \$562 from the City of Smithville Housing Authority the owner thereof;

62. Check Number 14924 issued July 2, 2010, to Joshua Bennett for \$562 from the City of Smithville Housing Authority the owner thereof;
63. Check Number 14961 issued September 1, 2010, to Linda McElroy for \$450 from the City of Smithville Housing Authority the owner thereof;
64. Check Number 14988 issued October 1, 2010, to Linda McElroy for \$450 from the City of Smithville Housing Authority the owner thereof;
65. Check Number 15013 issued November 1, 2010, to Linda McElroy for \$450 from the City of Smithville Housing Authority the owner thereof;
66. Check Number 15038 issued December 1, 2010, to Linda McElroy for \$450 from the City of Smithville Housing Authority the owner thereof;
67. Check Number 15062 issued January 1, 2011, to Linda McElroy for \$450 from the City of Smithville Housing Authority the owner thereof;
68. Check Number 15088 issued February 1, 2011, to Linda McElroy for \$450 from the City of Smithville Housing Authority the owner thereof;
69. Check Number 15115 issued March 1, 2011, to Linda McElroy for \$450 from the City of Smithville Housing Authority the owner thereof;
70. Check Number 15140 issued April 1, 2011, to Linda McElroy for \$450 from the City of Smithville Housing Authority the owner thereof;
71. Check Number 15165 issued May 1, 2011, to Linda McElroy for \$450 from the City of Smithville Housing Authority the owner thereof;
72. Check Number 15191 issued June 1, 2011, to Linda McElroy for \$450 from the City of Smithville Housing Authority the owner thereof;
73. Check Number 15215 issued July 1, 2011, to Linda McElroy for \$450 from the City of Smithville Housing Authority the owner thereof;
74. Check Number 15239 issued August 1, 2011, to Linda McElroy for \$450 from the City of Smithville Housing Authority the owner thereof;
75. Check Number 15264 issued September 1, 2011, to Linda McElroy for \$450 from the City of Smithville Housing Authority the owner thereof;
76. Check Number 15292 issued October 1, 2011, to Linda McElroy for \$450 from the City of Smithville Housing Authority the owner thereof;

77. Check Number 14176 issued January 1, 2008, to Tony Bennett for \$748 from the City of Smithville Housing Authority the owner thereof;
78. Check Number 14203 issued January 30, 2008, to Tony Bennett for \$748 from the City of Smithville Housing Authority the owner thereof;
79. Check Number 14206 issued February 1, 2008, to Tony Bennett for \$748 from the City of Smithville Housing Authority the owner thereof;
80. Check Number 14235 issued April 1, 2008, to Tony Bennett for \$1,988 from the City of Smithville Housing Authority the owner thereof;
81. Check Number 14260 issued May 1, 2008, to Tony Bennett for \$748 from the City of Smithville Housing Authority the owner thereof;
82. Check Number 14284 issued June 1, 2008, to Tony Bennett for \$748 from the City of Smithville Housing Authority the owner thereof;
83. Check Number 14304 issued March 1, 2008, to Tony Bennett for \$1,523 from the City of Smithville Housing Authority the owner thereof;
84. Check Number 14329 issued June 1, 2008, to Tony Bennett for \$748 from the City of Smithville Housing Authority the owner thereof;
85. Check Number 14336 issued July 1, 2008, to Tony Bennett for \$748 from the City of Smithville Housing Authority the owner thereof;
86. Check Number 14364 issued August 1, 2008, to Tony Bennett for \$748 from the City of Smithville Housing Authority the owner thereof;
87. Check Number 14388 issued August 28, 2008, to Tony Bennett for \$1,131 from the City of Smithville Housing Authority the owner thereof;
88. Check Number 14406 issued October 1, 2008, to Tony Bennett for \$748 from the City of Smithville Housing Authority the owner thereof;
89. Check Number 14428 issued November 1, 2008, to Tony Bennett for \$1,131 from the City of Smithville Housing Authority the owner thereof;
90. Check Number 14451 issued December 1, 2008, to Tony Bennett for \$1,131 from the City of Smithville Housing Authority the owner thereof;
91. Check Number 14475 issued January 1, 2009, to Tony Bennett for \$748 from the City of Smithville Housing Authority the owner thereof;

92. Check Number 14477 issued January 1, 2009, to Tony Bennett for \$748 from the City of Smithville Housing Authority the owner thereof;
93. Check Number 14177 issued January 1, 2008, to Wendall Bennett for \$2,720 from the City of Smithville Housing Authority the owner thereof;
94. Check Number 14207 issued February 1, 2008, to Wendall Bennett for \$1,961 from the City of Smithville Housing Authority the owner thereof;
95. Check Number 14236 issued April 1, 2008, to Wendall Bennett for \$3,384 from the City of Smithville Housing Authority the owner thereof;
96. Check Number 14261 issued May 1, 2008, to Wendall Bennett for \$532 from the City of Smithville Housing Authority the owner thereof;
97. Check Number 14282 issued April 30, 2008, to Wendall Bennett for \$750 from the City of Smithville Housing Authority the owner thereof;
98. Check Number 14285 issued June 1, 2008, to Wendall Bennett for \$532 from the City of Smithville Housing Authority the owner thereof;
99. Check Number 14305 issued March 1, 2008, to Wendall Bennett for \$3,983 from the City of Smithville Housing Authority the owner thereof;
100. Check Number 14362 issued August 28, 2008, to Wendall Bennett for \$1,620 from the City of Smithville Housing Authority the owner thereof;
101. Check Number 14407 issued October 1, 2008, to Wendall Bennett for \$1,000 from the City of Smithville Housing Authority the owner thereof;
102. Check Number 14474 issued January 1, 2009, to Wendall Bennett for \$532 from the City of Smithville Housing Authority the owner thereof;
103. Check Number 14503 issued February 1, 2009, to Wendall Bennett for \$537 from the City of Smithville Housing Authority the owner thereof;
104. Check Number 14527 issued March 1, 2009, to Wendall Bennett for \$537 from the City of Smithville Housing Authority the owner thereof;
105. Check Number 14550 issued April 1, 2009, to Wendall Bennett for \$537 from the City of Smithville Housing Authority the owner thereof;
106. Check Number 14602 issued June 1, 2009, to Wendall Bennett for \$508 from the City of Smithville Housing Authority the owner thereof;

107. Check Number 14626 issued July 1, 2009, to Wendall Bennett for \$508 from the City of Smithville Housing Authority the owner thereof;
108. Check Number 14651 issued August 1, 2009, to Wendall Bennett for \$508 from the City of Smithville Housing Authority the owner thereof;
109. Check Number 14675 issued September 1, 2009, to Wendall Bennett for \$496 from the City of Smithville Housing Authority the owner thereof;
110. Check Number 14790 issued February 1, 2010, to Wendall Bennett for \$604 from the City of Smithville Housing Authority the owner thereof;
111. Check Number 14859 issued April 29, 2010, to Wendall Bennett for \$539 from the City of Smithville Housing Authority the owner thereof;
112. Check Number 14904 issued June 30, 2010, to Wendall Bennett for \$705 from the City of Smithville Housing Authority the owner thereof;
113. Check Number 14928 issued August 1, 2010, to Wendall Bennett for \$741 from the City of Smithville Housing Authority the owner thereof;
114. Check Number 14951 issued September 1, 2010, to Wendall Bennett for \$741 from the City of Smithville Housing Authority the owner thereof;
115. Check Number 14978 issued October 1, 2010, to Wendall Bennett for \$741 from the City of Smithville Housing Authority the owner thereof;
116. Check Number 15002 issued November 1, 2010, to Wendall Bennett for \$741 from the City of Smithville Housing Authority the owner thereof;
117. Check Number 15027 issued December 1, 2010, to Wendall Bennett for \$741 from the City of Smithville Housing Authority the owner thereof;
118. Check Number 15052 issued January 1, 2011, to Wendall Bennett for \$741 from the City of Smithville Housing Authority the owner thereof;
119. Check Number 15075 issued January 7, 2011, to Wendall Bennett for \$427 from the City of Smithville Housing Authority the owner thereof;
120. Check Number 15078 issued February 1, 2011, to Wendall Bennett for \$741 from the City of Smithville Housing Authority the owner thereof;
121. Check Number 15104 issued March 1, 2011, to Wendall Bennett for \$741 from the City of Smithville Housing Authority the owner thereof;

122. Check Number 15129 issued April 1, 2011, to Wendall Bennett for \$1,391 from the City of Smithville Housing Authority the owner thereof;
123. Check Number 15153 issued May 1, 2011, to Wendall Bennett for \$1,391 from the City of Smithville Housing Authority the owner thereof;
124. Check Number 15179 issued June 1, 2011, to Wendall Bennett for \$2,348 from the City of Smithville Housing Authority the owner thereof;
125. Check Number 15202 issued July 1, 2011, to Wendall Bennett for \$2,185 from the City of Smithville Housing Authority the owner thereof;
126. Check Number 15227 issued August 1, 2011, to Wendall Bennett for \$2,185 from the City of Smithville Housing Authority the owner thereof;
127. Check Number 15251 issued September 1, 2011, to Wendall Bennett for \$2,185 from the City of Smithville Housing Authority the owner thereof;
128. Check Number 15278 issued October 1, 2011, to Wendall Bennett for \$2,156 from the City of Smithville Housing Authority the owner thereof;
129. Check Number 15303 issued November 1, 2011, to Wendall Bennett for \$2,156 from the City of Smithville Housing Authority the owner thereof;
130. Check Number 15330 issued December 1, 2011, to Wendall Bennett for \$2,196 from the City of Smithville Housing Authority the owner thereof;
131. Check Number 15357 issued January 1, 2012, to Wendall Bennett for \$2,196 from the City of Smithville Housing Authority the owner thereof;
132. Check Number 15384 issued February 1, 2012, to Wendall Bennett for \$3,159 from the City of Smithville Housing Authority the owner thereof;
133. Check Number 15411 issued March 1, 2012, to Wendall Bennett for \$1,897 from the City of Smithville Housing Authority the owner thereof;
134. Check Number 15438 issued April 1, 2012, to Wendall Bennett for \$2,136 from the City of Smithville Housing Authority the owner thereof;
135. Check Number 15466 issued May 1, 2012, to Wendall Bennett for \$2,279 from the City of Smithville Housing Authority the owner thereof;
136. Check Number 14327 issued March 28, 2008, to Wendall Bennett, Jr. for \$3,384 from the City of Smithville Housing Authority the owner thereof;

137. Check Number 14328 issued June 1, 2008, to Wendall Bennett, Jr. for \$1,867 from the City of Smithville Housing Authority the owner thereof;
138. Check Number 14356 issued May 30, 2008, to Wendall Bennett, Jr. for \$1,282 from the City of Smithville Housing Authority the owner thereof;
139. Check Number 14385 issued July 31, 2008, to Wendall Bennett, Jr. for \$1,282 from the City of Smithville Housing Authority the owner thereof;
140. Check Number 14449 issued November 4, 2008, to Wendall Bennett, Jr. for \$1,620 from the City of Smithville Housing Authority the owner thereof;
141. Check Number 14473 issued December 1, 2008, to Wendall Bennett, Jr. for \$1,620 from the City of Smithville Housing Authority the owner thereof;
142. Check Number 14597 issued May 8, 2009, to Wendall Bennett, Jr. for \$406.39 from the City of Smithville Housing Authority the owner thereof;
143. Check Number 14787 issued January 15, 2010, to Wendall Bennett, Jr. for \$604 from the City of Smithville Housing Authority the owner thereof;
144. Check Number 14435 issued November 1, 2008, to WJ Jennings for \$363 from the City of Smithville Housing Authority the owner thereof;
145. Check Number 14459 issued December 1, 2008, to WJ Jennings for \$363 from the City of Smithville Housing Authority the owner thereof;
146. Check Number 14487 issued January 1, 2009, to WJ Jennings for \$363 from the City of Smithville Housing Authority the owner thereof;
147. Check Number 14510 issued February 1, 2009, to WJ Jennings for \$363 from the City of Smithville Housing Authority the owner thereof;
148. Check Number 14534 issued March 1, 2009, to WJ Jennings for \$363 from the City of Smithville Housing Authority the owner thereof;
149. Check Number 14558 issued April 1, 2009, to WJ Jennings for \$363 from the City of Smithville Housing Authority the owner thereof;
150. Check Number 14580 issued May 1, 2009, to WJ Jennings for \$363 from the City of Smithville Housing Authority the owner thereof;
151. Check Number 14609 issued June 1, 2009, to WJ Jennings for \$363 from the City of Smithville Housing Authority the owner thereof;

152. Check Number 14633 issued July 1, 2009, to WJ Jennings for \$363 from the City of Smithville Housing Authority the owner thereof;
153. Check Number 14658 issued August 1, 2009, to WJ Jennings for \$363 from the City of Smithville Housing Authority the owner thereof;
154. Check Number 14696 issued September 11, 2009, to WJ Jennings for \$363 from the City of Smithville Housing Authority the owner thereof;
155. Check Number 14706 issued October 1, 2009, to WJ Jennings for \$363 from the City of Smithville Housing Authority the owner thereof;
156. Check Number 14728 issued November 1, 2009, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
157. Check Number 14749 issued December 1, 2009, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
158. Check Number 14772 issued January 1, 2010, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
159. Check Number 14797 issued February 1, 2010, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
160. Check Number 14819 issued March 1, 2010, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
161. Check Number 14842 issued April 1, 2010, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
162. Check Number 14866 issued May 1, 2010, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
163. Check Number 14887 issued June 1, 2010, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
164. Check Number 14934 issued August 1, 2010, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
165. Check Number 14985 issued October 1, 2010, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
166. Check Number 15010 issued November 1, 2010, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;

167. Check Number 15035 issued December 1, 2010, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
168. Check Number 15059 issued January 1, 2011, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
169. Check Number 15085 issued February 1, 2011, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
170. Check Number 15112 issued March 1, 2011, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
171. Check Number 15137 issued April 1, 2011, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
172. Check Number 15161 issued May 1, 2011, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
173. Check Number 15187 issued June 1, 2011, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
174. Check Number 15211 issued July 1, 2011, to WJ Jennings for \$352 from the City of Smithville Housing Authority the owner thereof;
175. Check Number 15260 issued September 1, 2011, to WJ Jennings for \$340 from the City of Smithville Housing Authority the owner thereof;
176. Check Number 15287 issued October 1, 2011, to WJ Jennings for \$340 from the City of Smithville Housing Authority the owner thereof;
177. Check Number 11115 issued January 2, 2008, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
178. Check Number 11142 issued January 18, 2008, to Wendall Bennett for \$400 from the City of Smithville Housing Authority the owner thereof;
179. Check Number 11152 issued January 25, 2008, to Wendall Bennett for \$400 from the City of Smithville Housing Authority the owner thereof;
180. Check Number 11173 issued February 1, 2008, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
181. Check Number 11216 issued March 7, 2008, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;

182. Check Number 11266 issued March 28, 2008, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
183. Check Number 11290 issued April 18, 2008, to Wendall Bennett for \$400 from the City of Smithville Housing Authority the owner thereof;
184. Check Number 11306 issued April 28, 2008, to Wendall Bennett for \$400 from the City of Smithville Housing Authority the owner thereof;
185. Check Number 11313 issued May 2, 2008, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
186. Check Number 11347 issued June 1, 2008, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
187. Check Number 11372 issued July 1, 2008, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
188. Check Number 11385 issued June 27, 2008, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
189. Check Number 11386 issued July 9, 2008, to Wendall Bennett for \$400 from the City of Smithville Housing Authority the owner thereof;
190. Check Number 11418 issued July 25, 2008, to Wendall Bennett for \$1,475 from the City of Smithville Housing Authority the owner thereof;
191. Check Number 11435 issued August 1, 2008, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
192. Check Number 11485 issued September 2, 2008, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
193. Check Number 11541 issued October 2, 2008, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
194. Check Number 11587 issued November 4, 2008, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
195. Check Number 11622 issued December 1, 2008, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
196. Check Number 11666 issued December 31, 2008, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;

197. Check Number 11731 issued January 30, 2009, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
198. Check Number 11775 issued March 2, 2009, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
199. Check Number 11819 issued April 1, 2009, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
200. Check Number 11874 issued May 1, 2009, to Wendall Bennett for \$500 from the City of Smithville Housing Authority the owner thereof;
201. Check Number 11904 issued June 1, 2009, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
202. Check Number 11941 issued July 1, 2009, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
203. Check Number 12003 issued July 31, 2009, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
204. Check Number 12049 issued August 31, 2009, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
205. Check Number 12102 issued October 1, 2009, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
206. Check Number 12138 issued November 2, 2009, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
207. Check Number 12176 issued December 2, 2009, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
208. Check Number 12232 issued January 4, 2010, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
209. Check Number 12272 issued February 1, 2010, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
210. Check Number 12315 issued March 1, 2010, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
211. Check Number 12352 issued April 1, 2010, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;

212. Check Number 12394 issued May 3, 2010, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
213. Check Number 12429 issued June 4, 2010, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
214. Check Number 12464 issued July 1, 2010, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
215. Check Number 12519 issued August 2, 2010, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
216. Check Number 12563 issued August 31, 2010, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
217. Check Number 12612 issued October 1, 2010, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
218. Check Number 12652 issued November 2, 2010, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
219. Check Number 12690 issued December 1, 2010, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
220. Check Number 12722 issued January 3, 2011, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
221. Check Number 12758 issued February 1, 2011, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
222. Check Number 12803 issued March 1, 2011, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
223. Check Number 12832 issued April 1, 2011, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
224. Check Number 12874 issued May 3, 2011, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
225. Check Number 12906 issued June 1, 2011, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
226. Check Number 12945 issued July 1, 2011, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;

227. Check Number 12983 issued July 29, 2011, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
228. Check Number 13023 issued September 1, 2011, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
229. Check Number 13068 issued October 3, 2011, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
230. Check Number 13109 issued November 1, 2011, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
231. Check Number 13145 issued December 1, 2011, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
232. Check Number 13196 issued December 30, 2011, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
233. Check Number 13424 issued May 18, 2012, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
234. Check Number 13418 issued May 11, 2012, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;
235. Check Number 13405 issued May 7, 2012, to Wendall Bennett for \$600 from the City of Smithville Housing Authority the owner thereof;

without the effective consent of the owner of said property, namely the City of Smithville Housing Authority, and with intent to deprive the owner of the property.

And it is further presented in and to said Court that all of the said property was appropriated pursuant to one scheme or continuing course of conduct, and the aggregate value of the property obtained was \$200,000 or more.

And it is further presented in and to said Court that the defendant was then and there a public servant, to-wit: Executive Director for the City of Smithville Housing Authority, at the time of the offense and the property appropriated came into the defendant's custody, possession, or control by virtue of her status as a public servant.

And it is further presented in and to said Court that the defendant was then and there in a contractual relationship with the government, to-wit: as Executive Director for the City of Smithville Housing Authority, defendant was in a contractual relationship to provide rental assistance on behalf of the United States Government, at the time of the offense and the property appropriated came into the defendant's custody, possession, or control by virtue of the contractual relationship.

COUNT II

BRENDA DAUGHTREY SCHROEDER, hereinafter styled Defendant, before the presentment of this indictment, in the County and State aforesaid, did then and there intentionally and knowingly make materially false or misleading written statements on documents, more specifically described below, that are to be completed by a person applying for public housing through the Housing Choice Voucher Program managed by the U.S. Department of Housing and Urban Development and the Housing Authority of the City of Smithville, Texas, to obtain property or credit, in the following instances:

1. On or about and before November 1, 2011, Defendant made a written statement on a "Self Employment Income Certification," and signed the name "Joe Currie" as the Tenant/Applicant and that "Joe Currie" would earn \$5,200 in the next 12 months and said statement was materially false or misleading, and was made in the course of obtaining property; and
2. On or about and before November 11, 2011, Defendant made a written statement on the "Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards," and signed the name "Wendall Bennett" as Lessor of the property and said statement was materially false or misleading, and was made in the course of obtaining property; and
3. On or about and before November 11, 2011, Defendant made a written statement on the "Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards" and signed the name "Joe Currie" as the Lessee of the property and said statement was materially false or misleading, and was made in the course of obtaining property; and
4. On or about and before November 11, 2011, Defendant made a written statement on a Landlord Verification Form and signed the name "Wendall Bennett" as Landlord of the property and said statement was materially false or misleading, and was made in the course of obtaining property;
5. On or about and before November 11, 2011, Defendant made a written statement on a Landlord Verification Form and signed the name "Joe Currie" as the Applicant to lease

the property and said statement was materially false or misleading, and was made in the course of obtaining property;

6. On or about and before November 11, 2011, Defendant made a written statement on a "Smoke Alarm Release" and signed the name "Joe Currie" as the Head of Lease and said statement was materially false or misleading, and was made in the course of obtaining property; and

7. On or about and before October 30, 2011, Defendant made a written statement on an "Anti-Drug Addendum" and signed the name "Joe Currie" as the Tenant and said statement was materially false or misleading, and was made in the course of obtaining property; and

8. On or about and before October 30, 2011, Defendant made a written statement on an "Authorization" and signed the name "Joe Currie" as the Applicant to lease the property and said statement was materially false or misleading, and was made in the course of obtaining property; and

9. On or about and before November 1, 2011, Defendant made a written statement on a Voucher and signed the name "Joe Currie" as the Family Representative and said statement was materially false or misleading, and was made in the course of obtaining property; and

10. On or about and before November 1, 2011, Defendant made a written statement on a "Request for Tenancy Approval" (form HUD-52517) and signed the name "Joe Currie" as the Household Head of the leased property and said statement was materially false or misleading, and was made in the course of obtaining property; and

11. On or about and before November 11, 2011, Defendant made a written statement on a "Criminal Check Acknowledgement" and review of the "One Strike Policy" and signed the name "Joe Currie" as the Applicant to lease the property and said statement was materially false or misleading, and was made in the course of obtaining property; and

12. On or about and before November 1, 2011, Defendant made a written statement on an "Authorization for the Release of Information/Privacy Act Notice" (form HUD-9886) and signed the name "Joe Currie" as Head of Household and said statement was materially false or misleading, and was made in the course of obtaining property; and

13. On or about and before November 1, 2011, Defendant made a written statement on an acknowledgement of receipt of a copy of the "Women's Violence Act Policy" and signed the name "Joe Currie" and said statement was materially false or misleading, and was made in the course of obtaining property; and

14. On or about and before November 1, 2011, Defendant made a written statement on an application for admission to the Housing Authority of the City of Smithville, Texas, authorizing the Smithville Police Department to release any and all of his criminal history

to the Housing Authority of the City of Smithville, Texas, and signed the name "Joe Currie" as Applicant and said statement was materially false or misleading, and was made in the course of obtaining property; and

15. On or about and before November 1, 2011, Defendant made a written statement on an application for admission to the Housing Authority of the City of Smithville, Texas, authorizing the Bastrop County Sheriff's Department to release any and all of his criminal history to the Housing Authority of the City of Smithville, Texas, and signed the name "Joe Currie" as Applicant and said statement was materially false or misleading, and was made in the course of obtaining property; and

16. On or about and before November 1, 2011, Defendant made a written statement on a "Debts Owed to Public Housing Agencies and Terminations" (form HUD-52675) and signed the name "Joe Currie" and said statement was materially false or misleading, and was made in the course of obtaining property; and

17. On or about and before November 11, 2011, Defendant made a written statement on a "Lead Base Paint Brochure Certification" and signed the name "Joe Currie" as Resident and said statement was materially false or misleading, and was made in the course of obtaining property; and

18. On or about and before October 30, 2011, Defendant made a written statement on an "Anti-Drug Addendum" and signed the name "Joe Currie" as Tenant and said statement was materially false or misleading, and was made in the course of obtaining property; and

19. On or about and before May 3, 2012, Defendant made a written statement on an "Inspection Form" (form HUD-52580) and signed the name "Jay Spitzer" as Tenant and said statement was materially false or misleading, and was made in the course of obtaining property; and

20. On or about and before May 26, 2012, Defendant made a written statement on an "Authorization for Release of Information/Privacy Act Notice" (form HUD-52580) and signed the name "Jay Spitzer" as Head Tenant and said statement was materially false or misleading, and was made in the course of obtaining property; and

21. On or about and before May 26, 2012, Defendant made a written statement on an "Authorization for Release of Information/Privacy Act Notice" (form HUD-52580) and signed the name "Pecos Bohannon" as other family member and said statement was materially false or misleading, and was made in the course of obtaining property; and

22. On or about and before May 26, 2012, Defendant made a written statement on an "Authorization for Release of Information/Privacy Act Notice" (form HUD-52580) and signed the "Travis Bell" as other family member and said statement was materially false or misleading, and was made in the course of obtaining property; and

23. On or about and before April 1, 2011, Defendant made a written statement on a "Part I – Penalties for FRAUD" on a Section 8 Voucher and signed the name "Jay Spitzer" as the Head of Household and said statement was materially false or misleading, and was made in the course of obtaining property; and
24. On or about and before April 1, 2011, Defendant made a written statement on a "Part I – Penalties for FRAUD" on a Section 8 Voucher and signed the name "Pecos Bohannon" as Other Adult Member of the Household and said statement was materially false or misleading, and was made in the course of obtaining property; and
25. On or about and before January 25, 2012, Defendant made a written statement on an "Authorization for Release of Information/Privacy Act Notice" (form HUD-52580) and signed the name "Christina Smith" as Tenant and said statement was materially false or misleading, and was made in the course of obtaining property; and
26. On or about and before May 1, 2012, Defendant made a written statement on an "Employment Verification Form" and signed the name "Christina Smith" as Tenant/Applicant and said statement was materially false or misleading, and was made in the course of obtaining property; and
27. On or about and before May 1, 2012, Defendant made a written statement on an acknowledgement of receipt of a copy of the "Women's Violence Act Policy" and signed the name "Christina Smith" and said statement was materially false or misleading, and was made in the course of obtaining property; and
28. On or about and before May 1, 2012, Defendant made a written statement on a "Lead Base Paint Brochure Certification" and signed the name "Christina Smith" as Resident and said statement was materially false or misleading, and was made in the course of obtaining property; and
29. On or about and before May 1, 2012, Defendant made a written statement to abide by the "One Strike Policy" and signed the name "Christina Smith" and said statement was materially false or misleading, and was made in the course of obtaining property; and
30. On or about and before May 1, 2012, Defendant made a written statement on an "Anti-Drug Addendum" and signed the name "Christina Smith" as Tenant and said statement was materially false or misleading, and was made in the course of obtaining property; and
31. On or about and before May 1, 2012, Defendant made a written statement on an "Anti-Drug Addendum" that the property to be leased was located at 602 Payne, Olney, Texas, and was signed with the name "Christina Smith" and said statement was materially false or misleading, and was made in the course of obtaining property; and
32. On or about and before May 1, 2012, Defendant made a written statement on a "Disposition Arrangements for Deceased Tenants" and signed the name "Christina

Smith” as Tenant and said statement was materially false or misleading, and was made in the course of obtaining property; and

33. On or about and before May 1, 2012, Defendant made a written statement on a “Debts Owed to Public Housing Agencies and Terminations” (form HUD-52675) and signed the name “Christina Smith” and said statement was materially false or misleading, and was made in the course of obtaining property; and

34. On or about and before May 1, 2012, Defendant made a written statement on an application for admission, authorizing the Smithville Police Department to release any and all of her criminal history to the Housing Authority of the City of Smithville, Texas, and signed the name “Christina Smith” as Applicant and said statement was materially false or misleading, and was made in the course of obtaining property; and

35. On or about and before May 1, 2012, Defendant made a written statement on an application for admission, authorizing the Bastrop County Sheriff’s Department to release any and all of her criminal history to the Housing Authority of the City of Smithville, Texas, and signed the name “Christina Smith” as Applicant and said statement was materially false or misleading, and was made in the course of obtaining property; and

36. On or about and before May 1, 2012, Defendant made a written statement on a “Criminal Check Acknowledgement” and signed the name “Christina Smith” as Applicant and said statement was materially false or misleading, and was made in the course of obtaining property; and

37. On or about and before May 1, 2012, Defendant made a written statement concerning citizenship and signed the name “Robert A. Smith” and said statement was materially false or misleading, and was made in the course of obtaining property; and

38. On or about and before May 1, 2012, Defendant made a written statement concerning residency in Smithville, Texas, and signed the name “Christina Smith” and said statement was materially false or misleading, and was made in the course of obtaining property; and

39. On or about and before February 1, 2012, Defendant made a written statement listing all persons residing in the residence and signed the name “Christina Smith” as Head of Household and said statement was materially false or misleading, and was made in the course of obtaining property; and

40. On or about and before February 1, 2012, Defendant made a written statement listing Robert A. Smith as a resident in connection with the U.S. Housing and Urban Development Section 8 Voucher Program and said statement was materially false or misleading, and was made in the course of obtaining property; and

41. On or about and before February 1, 2012, Defendant made a written statement on an application for admission, authorizing the Smithville Police Department to release any and all of her criminal history to the Housing Authority of the City of Smithville, Texas,

and signed the name "Christina Smith" as Applicant and said statement was materially false or misleading, and was made in the course of obtaining property; and

42. On or about and before February 1, 2012, Defendant made a written statement on a "Criminal Check Acknowledgement" and signed the name "Christina Smith" as Applicant and said statement was materially false or misleading, and was made in the course of obtaining property; and

43. On or about and before February 1, 2012, Defendant made a written statement of Certification and Authorization and signed the name "Christina Smith" as Applicant and said statement was materially false or misleading, and was made in the course of obtaining property; and

44. On or about and before February 1, 2012, Defendant made a written statement on a "Request for Tenancy Approval" (form HUD-52517) and signed the name "Christina Smith" as Household Head and said statement was materially false or misleading, and was made in the course of obtaining property; and

45. On or about and before February 1, 2012, Defendant made a written statement on a "Request for Tenancy Approval" (form HUD-52517) and signed the name "Wendall Bennett" as Owner of the property to be leased and said statement was materially false or misleading, and was made in the course of obtaining property; and

46. On or about and before February 1, 2012, Defendant made a written statement on a "Request for Tenancy Approval" (form HUD-52517) and listed the address as 602 West Payne St., Olney, Tx., and said statement was materially false or misleading, and was made in the course of obtaining property; and

47. On or about and before February 1, 2012, Defendant made a written statement on a "Waiting List Policy" and signed the name "Christina Smith" as Applicant and said statement was materially false or misleading, and was made in the course of obtaining property; and

48. On or about and before February 1, 2012, Defendant made a written statement on an "Authorization for the Release of Information/Privacy Act Notice" (form HUD-9886) and signed the name "Christina Smith" as Head of Household and said statement was materially false or misleading, and was made in the course of obtaining property; and

49. On or about and before June 22, 2011, Defendant made a written statement on an "Employment Verification Form" and signed the name "Leah Zwahr" as the Tenant/Applicant and said statement was materially false or misleading, and was made in the course of obtaining property; and

50. On or about and before June 22, 2011, Defendant made a written statement on an "Employment Verification Form" that Leah Zwahr's base earnings for the past 12 months

was \$5,000 and said statement was materially false or misleading, and was made in the course of obtaining property; and

51. On or about and before June 22, 2011, Defendant made a written statement on an "Employment Verification Form" and signed the name "L.J. Daughtrey" and said statement was materially false or misleading, and was made in the course of obtaining property; and

52. On or about and before June 22, 2011, Defendant made a written statement on an "Authorization for Release of Information/Privacy Act Notice" (form HUD-52580) and signed the name "Leah Zwahr" as Tenant and said statement was materially false or misleading, and was made in the course of obtaining property; and

53. On or about and before August 10, 2011, Defendant made a written statement on an "Income Sources Worksheet" and signed the name "Leah Zwahr" as Resident and said statement was materially false or misleading, and was made in the course of obtaining property; and

54. On or about and before August 10, 2011, Defendant made a written statement on an "Income Sources Worksheet" and listed "Victoria Voncannon" as a resident and said statement was materially false or misleading, and was made in the course of obtaining property; and

55. On or about and before June 14, 2011, Defendant made a written statement on an "Income Sources Worksheet" and signed the name "Leah Zwahr" as Resident and said statement was materially false or misleading, and was made in the course of obtaining property; and

56. On or about and before June 14, 2011, Defendant made a written statement on an "Income Sources Worksheet" and listed "Victoria Voncannon" as a resident and said statement was materially false or misleading, and was made in the course of obtaining property; and

57. On or about and before June 14, 2011, Defendant made a written statement on an "Authorization for the Release of Information/Privacy Act Notice" (form HUD-9886) and signed the name "Leah Zwahr" as Head of Household and said statement was materially false or misleading, and was made in the course of obtaining property; and

58. On or about and before June 14, 2011, Defendant made a written statement on a "Part I – Penalties for FRAUD" on a Section 8 Voucher and signed the name "Leah Zwahr" as Head of Household and said statement was materially false or misleading, and was made in the course of obtaining property; and

59. On or about and before November 10, 2011, Defendant made a written statement on an "Authorization for the Release of Information/Privacy Act Notice" (form HUD-9886)

and signed the name “Leah Zwahr” as Head of Household and said statement was materially false or misleading, and was made in the course of obtaining property; and

60. On or about and before August 10, 2011, Defendant made a written statement on a “Part I – Penalties for FRAUD” on a Section 8 Voucher and signed the name “Leah Zwahr” as Head of Household and said statement was materially false or misleading, and was made in the course of obtaining property; and

61. On or about and before July 22, 2010, Defendant made a written statement on a Voucher (form HUD-52646) and signed the name “Leah Zwahr” as Family Representative and said statement was materially false or misleading, and was made in the course of obtaining property; and

62. On or about and before June 1, 2010, Defendant made a written statement on an “Employment Verification Form” and signed the name “L.J. Daughtrey” as Owner and said statement was materially false or misleading, and was made in the course of obtaining property; and

63. On or about and before August 1, 2010, Defendant made a written statement on a Termination of Lease Housing Assistance and signed the name “Brenda Daughtrey” as Landlord and said statement was materially false or misleading, and was made in the course of obtaining property; and

64. On or about and before August 1, 2010, Defendant made a written statement on a Termination of Lease Housing Assistance that indicated that “Brenda Daughtrey” was the owner of the leased property and said statement was materially false or misleading, and was made in the course of obtaining property; and

65. On or about and before August 1, 2010, Defendant made a written statement on a “Request for Tenancy Approval” (form HUD-52517) and signed the name “Brenda Daughtrey” as Owner/Owner Representative and said statement was materially false or misleading, and was made in the course of obtaining property; and

66. On or about and before August 1, 2010, Defendant made a written statement on a “Request for Tenancy Approval” (form HUD-52517) that the property leased was located in Needville, Tx., and said statement was materially false or misleading, and was made in the course of obtaining property; and

67. On or about and before September 16, 2011, Defendant made a written statement on a “Housing Assistance Payments Contract, Section 8 Tenant-Based Assistance” (form HUD-52641) and signed the name “Brenda Daughtrey” as Owner and said statement was materially false or misleading, and was made in the course of obtaining property; and

68. On or about and before July 22, 2010, Defendant made a written statement on a “Housing Assistance Payments Contract, Section 8 Tenant-Based Assistance” (form

HUD-52641) and signed the name "Brenda Daughtrey" as Owner and said statement was materially false or misleading, and was made in the course of obtaining property; and

69. On or about and before May 4, 2011, Defendant made a written statement on an "Authorization for Release of Information/Privacy Act Notice" (form HUD-52580) and signed the name "Brenda Daughtrey" as Owner and said statement was materially false or misleading, and was made in the course of obtaining property; and

70. On or about and before May 15, 2012, Defendant made a written statement on a "Housing Assistance Payments Contract, Section 8 Tenant-Based Assistance" (form HUD-52641) and signed the name "Brenda Daughtrey" as Owner and said statement was materially false or misleading, and was made in the course of obtaining property; and

71. On or about and before August 1, 2010, Defendant made a written statement on a "Housing Assistance Payments Contract, Section 8 Tenant-Based Assistance" (form HUD-52641) and signed the name "Brenda Daughtrey" as Owner of the property to be leased and said statement was materially false or misleading, and was made in the course of obtaining property; and

72. On or about and before May 15, 2012, Defendant made a written statement on a "Request for Tenancy Approval" (form HUD-52517) which listed the leased property as located in Pettus, Texas, and said statement was materially false or misleading, and was made in the course of obtaining property; and

73. On or about and before May 15, 2012, Defendant made a written statement on a "Request for Tenancy Approval" (form HUD-52517) and signed the name "Brenda Daughtrey" as Owner/Owner Representative and said statement was materially false or misleading, and was made in the course of obtaining property; and

74. On or about and before August 1, 2010, Defendant made a written statement on a "Request for Tenancy Approval" (form HUD-52517) that the leased property was located in Pettus, Texas, and said statement was materially false or misleading, and was made in the course of obtaining property; and

75. On or about and before August 1, 2010, Defendant made a written statement on a "Request for Tenancy Approval" (form HUD-52517) and signed the name "Brenda Daughtrey" as Owner/Owner Representative and said statement was materially false or misleading, and was made in the course of obtaining property; and

76. On or about and before February 10, 2012, Defendant made a written statement on an "Authorization for Release of Information/Privacy Act Notice" (form HUD-52580) and signed the name "Brenda Daughtrey" as Owner and said statement was materially false or misleading, and was made in the course of obtaining property; and

77. On or about and before February 25, 2012, Defendant made a written statement on a "Housing Assistance Payments Contract, Section 8 Tenant-Based Assistance" (form

HUD-52641) and signed the name “Brenda Daughtrey” as Owner and said statement was materially false or misleading, and was made in the course of obtaining property; and

78. On or about and before February 25, 2012, Defendant made a written statement on a “Request for Tenancy Approval” (form HUD-52517) and signed the name “Brenda Daughtrey” as Owner and said statement was materially false or misleading, and was made in the course of obtaining property; and

79. On or about and before February 1, 2012, Defendant made a written statement on a “Housing Assistance Payments Contract, Section 8 Tenant-Based Assistance” (form HUD-52641) and signed the name “Brenda Daughtrey” as Owner and said statement was materially false or misleading, and was made in the course of obtaining property; and

80. On or about and before January 15, 2011, Defendant made a written statement on a “Housing Assistance Payments Contract, Section 8 Tenant-Based Assistance” (form HUD-52641) and signed the name “Brenda Daughtrey” as Owner and said statement was materially false or misleading, and was made in the course of obtaining property; and

81. On or about and before February 1, 2012, Defendant made a written statement on a “Request for Tenancy Approval” (form HUD-52517) and signed the name “Brenda Daughtrey” as Owner/Owner Representative and said statement was materially false or misleading, and was made in the course of obtaining property; and

82. On or about and before February 1, 2012, Defendant made a written statement on a “Request for Tenancy Approval” (form HUD-52517) and signed the name “Janie Roberts” as Household Head and said statement was materially false or misleading, and was made in the course of obtaining property; and

83. On or about and before February 1, 2011, Defendant made a written statement on a “Request for Tenancy Approval” (form HUD-52517) and signed the name “Brenda Daughtrey” as Owner/Owner Representative and said statement was materially false or misleading, and was made in the course of obtaining property; and

84. On or about and before February 1, 2011, Defendant made a written statement on a “Request for Tenancy Approval” (form HUD-52517) and signed the name “Janie Roberts” as Household Head and said statement was materially false or misleading, and was made in the course of obtaining property; and

85. On or about and before February 10, 2012, Defendant made a written statement on an “Authorization for Release of Information/Privacy Act Notice” (form HUD-52580) and signed the name “Kelsey Williams” as Tenant and said statement was materially false or misleading, and was made in the course of obtaining property; and

86. On or about and before February 25, 2012, Defendant made a written statement on an “Authorization for the Release of Information/Privacy Act Notice” (form HUD-9886)

and signed the name "Kelsey Williams" and said statement was materially false or misleading, and was made in the course of obtaining property; and

87. On or about and before February 25, 2012, Defendant made a written statement on an "Employment Verification Form" and signed the name "Kelsey Williams" as Tenant/Applicant and said statement was materially false or misleading, and was made in the course of obtaining property; and

88. On or about and before February 22, 2012, Defendant made a written statement agreeing to abide by the "One Strike Policy" and signed the name "Kelsey Williams" and said statement was materially false or misleading, and was made in the course of obtaining property; and

89. On or about and before February 25, 2012, Defendant made a written statement on a "Debts Owed to Public Housing Agencies and Terminations" (form HUD-52675) and signed the name "Kelsey Williams" and said statement was materially false or misleading, and was made in the course of obtaining property; and

90. On or about and before February 25, 2012, Defendant made a written statement on a "Utility Verification Form" and signed the name "Kelsey Williams" as Applicant and said statement was materially false or misleading, and was made in the course of obtaining property; and

91. On or about and before February 25, 2012, Defendant made a written statement on an acknowledgement of receipt of a copy of the "Women's Violence Act Policy" and signed the name "Kelsey Williams" and said statement was materially false or misleading, and was made in the course of obtaining property; and

92. On or about and before February 10, 2012, Defendant made a written statement acknowledging that she must live in Smithville for one year once a Voucher has been issued in accordance with U.S. Department of Housing and Urban Development and signed the name "Kelsey Williams" and said statement was materially false or misleading, and was made in the course of obtaining property; and

93. On or about and before February 10, 2012, Defendant made a written statement on a "Disposition Arrangements for Deceased Tenants" and signed the name "Kelsey Williams" and said statement was materially false or misleading, and was made in the course of obtaining property; and

94. On or about and before February 25, 2012, Defendant made a written statement on a "Smoke Detector Certification" and signed the name "Kelsey Williams" as Resident and said statement was materially false or misleading, and was made in the course of obtaining property; and

95. On or about and before March 1, 2012, Defendant made a written statement on an "Anti-Drug Addendum" and signed the name "Kelsey Williams" and said statement was materially false or misleading, and was made in the course of obtaining property; and
96. On or about and before February 28, 2012, Defendant made a written statement on an "U.S. Department of Housing and Urban Development" Voucher (form HUD-52646) and signed the name "Kelsey Williams" as Family Representative and said statement was materially false or misleading, and was made in the course of obtaining property; and
97. On or about and before February 25, 2012, Defendant made a written statement on a "Request for Tenancy Approval" (form HUD-52517) and signed the name "Kelsey Williams" and said statement was materially false or misleading, and was made in the course of obtaining property; and
98. On or about and before January 9, 2012, Defendant made a written statement on an "Income Sources Worksheet" and signed the name "Janie Roberts" as Resident and said statement was materially false or misleading, and was made in the course of obtaining property; and
99. On or about and before December 30, 2011, Defendant made a written statement on a "Part I – Penalties for FRAUD" on a Section 8 Voucher and signed the name "Janie Roberts" and said statement was materially false or misleading, and was made in the course of obtaining property; and
100. On or about and before October 1, 2010, Defendant made a written statement on an Income Information by Head of Household Summary and signed the name "Janie Roberts" as Head of Household and said statement was materially false or misleading, and was made in the course of obtaining property; and
101. On or about and before January 8, 2011, Defendant made a written statement on an "Income Sources Worksheet" and signed the name "Janie Roberts" as Resident and said statement was materially false or misleading, and was made in the course of obtaining property; and
102. On or about and before January 8, 2011, Defendant made a written statement on an "Authorization for the Release of Information/Privacy Act Notice" (form HUD-9886) and signed the name "Janie Roberts" as Head Tenant and said statement was materially false or misleading, and was made in the course of obtaining property; and
103. On or about and before January 8, 2011, Defendant made a written statement on a "Part I – Penalties for FRAUD" on a Section 8 Voucher and signed the name "Janie Roberts" and said statement was materially false or misleading, and was made in the course of obtaining property; and
104. On or about and before January 13, 2010, Defendant made a written statement on an "Income Sources Worksheet" and signed the name "Janie Roberts" as Resident and

said statement was materially false or misleading, and was made in the course of obtaining property; and

105. On or about and before January 13, 2010, Defendant made a written statement on a "Part I – Penalties for FRAUD" on a Section 8 Voucher and signed the name "Janie Roberts" and said statement was materially false or misleading, and was made in the course of obtaining property; and

106. On or about and before January 13, 2010, Defendant made a written statement on an "Employer Income Verification" and signed the name "Janie Roberts" and said statement was materially false or misleading, and was made in the course of obtaining property; and

107. On or about and before August 3, 2010, Defendant made a written statement on a "Debts Owed to Public Housing Agencies and Terminations" (form HUD-52675) and signed the name "Janie Roberts" and said statement was materially false or misleading, and was made in the course of obtaining property; and

108. On or about and before February 1, 2012, Defendant made a written statement on an "Authorization for the Release of Information/Privacy Act Notice" (form HUD-9886) and signed the name "Janie Roberts" as Head Tenant and said statement was materially false or misleading, and was made in the course of obtaining property; and

109. On or about and before April 20, 2010, Defendant made a written statement on a "Request for Tenancy Approval" (form HUD-52517) and signed the name "Janie Roberts" as Household Head and said statement was materially false or misleading, and was made in the course of obtaining property.

And it is further presented in and to said Court that all of the said statements were made in order to obtain property pursuant to one scheme or continuing course of conduct, and the aggregate value of the property obtained was two hundred thousand dollars (\$200,000.00) or more.

COUNT III

On or about and between January 1, 2008, and May 31, 2012, and before presentment of this indictment, **BRENDA DAUGHTREY SCHROEDER**, hereinafter styled Defendant, in the County and State aforesaid, with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, WENDALL BOYD BENNETT, BRENDA FAYE DAUGHTREY, AND UNNAMED**

OTHER INDIVIDUALS did commit the offenses of Theft, Forgery, Tampering With a Governmental Record, Misapplication of Fiduciary Property, and Identity Theft.

And it is further presented in and to said Court that all of the said statements were made in order to obtain property pursuant to one scheme or continuing course of conduct, and the aggregate value of the property obtained was two hundred thousand dollars (\$200,000.00) or more.

AGAINST THE PEACE AND DIGNITY OF THE STATE.


GRAND JURY PRESIDING JUROR