

NO. 21-06-32996-A

PID: N/A  
BOND: \$

**THE STATE OF TEXAS VS. MONICA MENDEZ**

2021 JUL 15 PM 12:00

CHARGES:	<u>COUNTS 1-3:</u>	ILLEGAL VOTING (F2);	
	<u>COUNTS 4-10:</u>	UNLAWFULLY ASSISTING VOTER VOTING BALLOT BY MAIL ENHANCED (F3);	
	<u>COUNTS 11-18:</u>	UNLAWFUL POSS. OF BALLOT/BALLOT ENVELOPE ENHANCED (SJF);	VICTORIA COUNTY, TEXAS
	<u>COUNTS 19-26:</u>	ELECTION FRAUD ENHANCED (SJF)	

COURT: \_\_\_\_\_

**SUPERSEDING INDICTMENT**

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

THE GRAND JURY, for the County of Victoria, State of Texas, duly selected, empaneled, sworn, charged and organized as such at the <sup>July</sup> June term, A.D., 2021 of the 377<sup>th</sup> Judicial District Court for said County, upon their oaths present in and to said Court at said term, and before the presentment of this indictment, that:

**COUNT ONE**

On or about the 30<sup>th</sup> day of April, A.D., 2018, in the County of Victoria and State of Texas, one Monica Mendez, hereinafter known as Defendant, and before the presentment of this indictment, in Victoria County, Texas, did then and there knowingly mark Pablo Zambrano's ballot, without specific direction from Pablo Zambrano on how to mark the ballot,

**COUNT TWO**

And further, that Defendant, on or about the 1<sup>st</sup> day of May, A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly mark Thomas Durham's ballot, without specific direction from Thomas Durham how to mark the ballot,

**COUNT THREE**

And further, that Defendant, on or about the 2<sup>nd</sup> day of May, A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there

knowingly mark Kimberly Bednorz' ballot, without specific direction from Kimberly Bednorz on how to mark the ballot,

**COUNT FOUR**

And further, that Defendant, on or about the 23<sup>rd</sup> day of April A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly fail to sign the required written oath and enter her signature, name, and residence address on the official carrier envelope of a voter, Albert Escamilla, while assisting said voter,

**COUNT FIVE**

And further, that Defendant, on or about the 23<sup>rd</sup> day of April A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly fail to sign the required written oath and enter her signature, name, and residence address on the official carrier envelope of a voter, Sean Candengo, while assisting said voter,

**COUNT SIX**

And further, that Defendant, on or about the 26<sup>th</sup> day of April A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly fail to sign the required written oath and enter her signature, name, and residence address on the official carrier envelope of a voter, Toribio Olivares, while assisting said voter,

**COUNT SEVEN**

And further, that Defendant, on or about the 1<sup>st</sup> day of May A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly fail to sign the required written oath and enter her signature, name, and residence address on the official carrier envelope of a voter, Thomas Durham, while assisting said voter,

**COUNT EIGHT**

And further, that Defendant, on or about the 1<sup>st</sup> day of May A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly fail to sign the required written oath and enter her signature, name, and residence address on the official carrier envelope of a voter, Pedro Zambrano, while assisting said voter,

**COUNT NINE**

And further, that Defendant, on or about the 2<sup>nd</sup> day of May A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly fail to sign the required written oath and enter her signature, name, and residence address on the official carrier envelope of a voter, Kimberly Bednorz, while assisting said voter,

**COUNT TEN**

And further, that Defendant, on or about the 5<sup>th</sup> day of May A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly fail to sign the required written oath and enter her signature, name, and residence address on the official carrier envelope of a voter, Jerica Barker, while assisting said voter,

And further it is alleged that Defendant committed the offenses described in Counts Four through Ten in the May 5, 2018 Victoria County Water Control and Improvement District 1 Election,

**COUNT ELEVEN**

And further that Defendant, on or about the 23<sup>rd</sup> day of April A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Albert Escamilla,

**COUNT TWELVE**

And further that Defendant, on or about the 23<sup>rd</sup> day of April A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Sean Cadengo,

**COUNT THIRTEEN**

And further that Defendant, on or about the 26<sup>th</sup> day of April A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Toribio Olivares,

**COUNT FOURTEEN**

And further that Defendant, on or about the 30<sup>th</sup> day of April A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Pablo Zambrano,

**COUNT FIFTEEN**

And further that Defendant, on or about the 1<sup>st</sup> day of May A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Thomas Durham,

**COUNT SIXTEEN**

And further that Defendant, on or about the 1<sup>st</sup> day of May A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Pedro Zambrano,

**COUNT SEVENTEEN**

And further that Defendant, on or about the 2<sup>nd</sup> day of May A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Kimberly Bednorz,

**COUNT EIGHTEEN**

And further that Defendant, on or about the 5<sup>th</sup> day of May A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Jerica Barker,

And further it is alleged that Defendant committed the offenses described in Counts Eleven through Eighteen in the May 5, 2018 Victoria Counter Water Control and Improvement District 1 Election,

**COUNT NINETEEN**

**And further, that Defendant, on or about the 23<sup>rd</sup> day of April A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there while in the presence of the ballot and during the voting process, knowingly make an effort to influence the independent exercise of the vote of Sean Candengo, specifically: Defendant influenced Sean Candengo to vote for male candidates on the ballot for the 2018 Victoria County Water Control and Improvement District,**

**COUNT TWENTY**

**And further, that Defendant, on or about the 23<sup>rd</sup> day of April A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there cause a vote to be cast under false pretenses by Albert Escamilla, specifically: Defendant voted Albert Escamilla's ballot to vote for male candidates on the ballot for the 2018 Victoria County Water Control and Improvement District 1 Election.**

**COUNT TWENTY-ONE**

**And further, that Defendant, on or about the 26<sup>th</sup> day of April A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there cause a vote to be cast under false pretenses by Toribio Olivares, specifically: Defendant voted Toribio Olivares' ballot to vote for male candidates on the ballot for the 2018 Victoria County Water Control and Improvement District 1 Election,**

**COUNT TWENTY-TWO**

**And further, that Defendant, on or about the 30<sup>th</sup> day of April A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there cause a vote to be cast under false pretenses by Pablo Zambrano, specifically: Defendant voted Pablo Zambrano's ballot to vote for male candidates on the ballot for the 2018 Victoria County Water Control and Improvement District 1 Election,**

**COUNT TWENTY-THREE**

And further, that Defendant, on or about the 1<sup>st</sup> day of May A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there while in the presence of the ballot and during the voting process, knowingly make an effort to influence the independent exercise of the vote of Thomas Durham, specifically: Defendant influenced Thomas Durham to vote for male candidates on the ballot for the 2018 Victoria County Water Control and Improvement District,

**COUNT TWENTY-FOUR**

And further, that Defendant, on or about the 1<sup>st</sup> day of May A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there while in the presence of the ballot and during the voting process, knowingly make an effort to influence the independent exercise of the vote of Pedro Zambrano specifically: Defendant influenced Pedro Zambrano to vote for male candidates on the ballot for the 2018 Victoria County Water Control and Improvement District,

**COUNT TWENTY-FIVE**

And further, that Defendant, on or about the 2<sup>nd</sup> day of May A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there cause a vote to be cast under false pretenses by Kimberly Bednorz, specifically: Defendant voted Kimberly Bednorz' ballot to vote for male candidates on the ballot for the 2018 Victoria County Water Control and Improvement District 1 Election,

**COUNT TWENTY-SIX**

And further, that Defendant, on or about the 5<sup>th</sup> day of May A.D., 2018, in the County of Victoria and State of Texas, and before the presentment of this indictment, did then and there while in the presence of the ballot and during the voting process, knowingly make an effort to influence the independent exercise of the vote of Jerica Barker, specifically: Defendant influenced Jerica Barker to vote for male candidates on the ballot for the 2018 Victoria County Water Control and Improvement District,

And it is further alleged that Defendant committed the offenses described in Counts Nineteen through Twenty-Six in the May 5, 2018 Victoria County Water Control and Improvement District 1 Election,

And it is further alleged that Counts One through Twenty-Six were charged by information on Thursday April 22, 2021 in CAUSE NO: 21-06-32996-A,

**AGAINST THE PEACE AND DIGNITY OF THE STATE**

Signed on this the 15 day of July, A.D., 2021.

  
FOREMAN OF THE GRAND JURY