

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS000489

STATE OF NORTH CAROLINA

v.

LESLIE MCCRAE DOWLESS

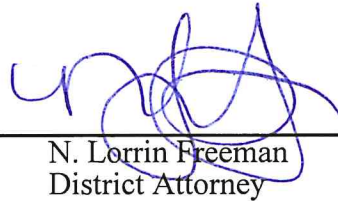
INDICTMENT- I. FELONIOUS OBSTRUCTION
OF JUSTICE
II. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE
III. POSSESSION OF ABSENTEE BALLOT

- I. The jurors for the State upon their oath present that on or between March 21, 2018 through May 8, 2018 in Wake County the defendant named above unlawfully, willfully, and feloniously did, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container-return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: defendant directed individuals to collect absentee ballots from voters, at times instructed individuals to sign certifications indicating they had witnessed the voter vote and properly execute the absentee ballot when they had not, and mailed or instructed others to mail the absentee ballot in such a manner to conceal the fact that the voter had not personally mailed it himself. As a result, these spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby

served to undermine the integrity of the absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-3(b).

- II. The jurors for the State upon their oath present that on or between March 21, 2018 through May 8, 2018, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with others, including but not limited to, Rebecca Thompson and Kelly N. Hendrix, with deceit and intent to defraud, to obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully; witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby served to undermine the integrity of the absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

III. The jurors for the State upon their oath present that on or between March 21, 2018 through April 26, 2018 in Bladen County the defendant named above unlawfully, willfully and feloniously did take into his possession for return to the Bladen County Board of Elections the absentee ballot of a voter, including, but not limited to, voters Mary Alice Davis, Sondra Kaye Deaver, and Ja_Bril Baker . Defendant was neither the voters' near relative nor the voters' verifiable legal guardian. This act was done in violation of N.C.G.S. 163A-1298(5) (fmr 163-226.3).



N. Lorrin Freeman
District Attorney

X

Agent Faircloth, NCSBI
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:

X **A TRUE BILL** by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

____ **NOT A TRUE BILL.**

FEB 26 2019

Date



Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS000488

STATE OF NORTH CAROLINA

v.

LESLIE MCCRAE DOWLESS

INDICTMENT- I. FELONIOUS OBSTRUCTION
OF JUSTICE
II. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE
III. POSSESSION OF ABSENTEE BALLOT
IV. FELONIOUS OBSTRUCTION OF JUSTICE

- I. The jurors for the State upon their oath present that on or between September 14, 2016 through November 8, 2016, in Wake County the defendant named above unlawfully, willfully, and feloniously did, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container-return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: defendant directed individuals to collect absentee ballots from voters, at times instructed individuals to sign certifications indicating they had witnessed the voter vote and properly execute the absentee ballot when they had not, and mailed or instructed others to mail the absentee ballot in such a manner to conceal the fact that the voter had not personally mailed it himself. As a result, these spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby

served to undermine the integrity of the absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-3(b).

- II. The jurors for the State upon their oath present that on or between September 14, 2016 through November 8, 2016, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with others, including but not limited to, Matthew Mathis, Caitlyn Croom, Tonia Gordon and Kelly N. Hendrix, with deceit and intent to defraud, to obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully, witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby served to undermine the integrity of the absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

- III. The jurors for the State upon their oath present that on or between September 14, 2016 through October 31, 2016 in Bladen County the defendant named above unlawfully, willfully and feloniously did take into his possession for return to the Bladen County Board of Elections the absentee ballot of a voter, including, but not limited to, voters Mitchell Barnes, Patricia Beasley, Alice Faye Carlton, Brandon Rich, Rachel Sessoms, Mary Elizabeth Edwards, Christy Cheshire Storms and Roger Lane Storms. Defendant was neither the voters' near relative nor the voters' verifiable legal guardian. This act was done in violation of N.C.G.S. 163A-1298(5) (fmr 163-226.3).
- IV. The jurors for the State upon their oath present that on or about October 24, 2016 in Bladen County the defendant named above unlawfully, willfully, and feloniously did, with deceit and intent to defraud, obstruct public and legal justice by providing false information to investigators with the North Carolina State Board of Elections and by counseling and encouraging Matthew Matthis and Caitlyn Croom to also provide false information to investigators. At the time, the North Carolina State Board of Elections investigators were investigating complaints received from voters Brenda Register and Heather Baldwin into the handling of absentee ballots during the 2016 general election in Bladen County. This act did obstruct public justice by resulting in false information being initially provided to the North Carolina State Board of Elections investigators. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-3(b).



N. Lorrin Freeman
District Attorney



Agent Faircloth, NCSBI
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after

hearing testimony, this bill was found to be:

X **A TRUE BILL** by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

____ **NOT A TRUE BILL.**

Date

FEB 26 2019

Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS000490

STATE OF NORTH CAROLINA

v.

INDICTMENT-

CAITLYN E. CROOM


I. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE

II. POSSESSION OF ABSENTEE BALLOT

- I. The jurors for the State upon their oath present that on or between September 14, 2016 through November 8, 2016, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with Leslie McCrae Dowless, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully; witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby served to undermine the integrity of the

absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

- II. The jurors for the State upon their oath present that on or between September 14, 2016 through October 19, 2016 in Bladen County the defendant named above unlawfully, willfully and feloniously did take into her possession for return to the Bladen County Board of Elections the absentee ballot of a voter, including, but not limited to, voters Mitchell Barnes, Patricia Beasley, and Angela Davis. Defendant was neither the voters' near relative nor the voters' verifiable legal guardian. This act was done in violation of N.C.G.S. 163A-1298(5) (fmr 163-226.3).



N. Lorrin Freeman
District Attorney

X

Agent Faircloth, NCSBI
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:

X **A TRUE BILL** by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

____ **NOT A TRUE BILL.**

FEB 26 2019

Date



Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS000491

STATE OF NORTH CAROLINA

v.

INDICTMENT-

MATTHEW MONROE MATHIS

I. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE
II. POSSESSION OF ABSENTEE BALLOT
III. FALSELY SIGNING CERTIFICATION ON
ABSENTEE BALLOT
IV. FALSELY SIGNING CERTIFICATION ON
ABSENTEE BALLOT

- I. The jurors for the State upon their oath present that on or between September 14, 2016 through November 8, 2016, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with Leslie McCrae Dowless, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully; witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public

justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby served to undermine the integrity of the absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

- II. The jurors for the State upon their oath present that on or between September 14, 2016 through October 19, 2016 in Bladen County the defendant named above unlawfully, willfully and feloniously did take into his possession for return to the Bladen County Board of Elections the absentee ballot of a voter, including, but not limited to, voters Mitchell Barnes, Patricia Beasley, and Angela Davis. Defendant was neither the voters' near relative nor the voters' verifiable legal guardian. This act was done in violation of N.C.G.S. 163A-1298(5) (fmr 163-226.3).
- III. The jurors for the State upon their oath present that on or about October 6, 2018 in Bladen County the defendant named above unlawfully, willfully and feloniously did falsely sign the name of Heather Register, a regularly qualified voter, on the certification on the absentee ballot container-envelope provided for by N.C.G.S. 163A-1307(b)(2) (fmr N.C.G.S. 163-229) and submitted the container-envelope with the ballot enclosed as if Heather Register herself had duly executed said container-envelope. This act was done in violation of N.C.G.S. 163A-1389 (fmr 163-275).
- IV. The jurors for the State upon their oath present that on or about October 6, 2018 in Bladen County the defendant named above unlawfully, willfully and feloniously did falsely sign the name of Timothy Register, a regularly qualified voter, on the certification on the absentee ballot container-envelope provided for by N.C.G.S. 163A-1307(b)(2) (fmr N.C.G.S. 163-229) and submitted the container-envelope with the ballot enclosed as if Timothy Register himself had duly executed said container-envelope. This act was done in violation of N.C.G.S. 163A-1389 (fmr 163-275).



N. Lorrin Freeman
District Attorney


X Agent Faircloth, NCSBI
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:

X **A TRUE BILL** by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

____ **NOT A TRUE BILL.**

FEB 26 2019
Date



Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS000492

STATE OF NORTH CAROLINA

v.

INDICTMENT-


TONIA MARIE GORDON

I. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE
II. POSSESSION OF ABSENTEE BALLOT

- I. The jurors for the State upon their oath present that on or between September 19, 2016 through November 8, 2016, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with Leslie McCrae Dowless, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully, witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby served to undermine the integrity of the


absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

- II. The jurors for the State upon their oath present that on or between September 19, 2016 through October 7, 2016 in Bladen County the defendant named above unlawfully, willfully and feloniously did take into her possession for return to the Bladen County Board of Elections the absentee ballot of a voter, including, but not limited to, voters Rachel Sessoms, Mary Elizabeth Edwards, W.J. Edwards, Christy Cheshire Storms and Roger Lane Storms. Defendant was neither the voters' near relative nor the voters' verifiable legal guardian. This act was done in violation of N.C.G.S. 163A-1298(5) (fmr 163-226.3).


N. Lorrin Freeman
District Attorney


Agent Faircloth, NCSBI
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:

 **A TRUE BILL** by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

____ **NOT A TRUE BILL.**

FEB 26 2019

Date


Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS000547

STATE OF NORTH CAROLINA

v.

INDICTMENT-

REBECCA D. THOMPSON

I. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE
II. POSSESSION OF ABSENTEE BALLOT

- I. The jurors for the State upon their oath present that on or between March 21, 2018 through May 8, 2018, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with Leslie McCrae Dowless, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully, witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby served to undermine the integrity of the

absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

- II. The jurors for the State upon their oath present that on or between March 21, 2018 through April 20, 2018 in Bladen County the defendant named above unlawfully, willfully and feloniously did take into her possession for return to the Bladen County Board of Elections the absentee ballot of a voter, including, but not limited to, voters Leonard H. Kinlaw, Patricia Ann Hyatt, Lori Ann Carmona and Jerry Wayne Dove. Defendant was neither the voters' near relative nor the voters' verifiable legal guardian. This act was done in violation of N.C.G.S. 163A-1298(5) (fmr 163-226.3).




N. Lorrin Freeman
District Attorney



Agent Faircloth, NCSBI
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:



A TRUE BILL by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

NOT A TRUE BILL.

FEB 26 2019

Date



Grand Jury Foreman