

- D. IN A CONTINUING COURSE OF CONDUCT FROM 2019 TO 2022, DEFENDANT COMMITTED THE OFFENSE OF THEFT AND MISAPPROPRIATED HOUSING AUTHORITY FUNDS BY TRANSFERRING FUNDS TO THE DEFENDANT'S PERSONAL ACCOUNTS AND DEFENDANT'S PRIVATE BUSINESS ACCOUNTS.
- E. IN A CONTINUING COURSE OF CONDUCT FROM 2019 TO 2022 DEFENDANT COMMITTED THE OFFENSE OF THEFT AND MISAPPROPRIATED HOUSING AUTHORITY FUNDS BY USING THOSE FUNDS TO PAY FOR CHRISTMAS PARTIES IN 2019 AND 2020.
- F. IN A CONTINUING COURSE OF CONDUCT FROM 2019 TO 2022 DEFENDANT COMMITTED THEFT AND MISAPPROPRIATED HOUSING AUTHORITY FUNDS BY PAYING HIMSELF FOR SERVICES PROVIDED.
- G. IN A CONTINUING COURSE OF CONDUCT FROM 2019 TO 2022 DEFENDANT COMMITTED THEFT AND MISAPPROPRIATED HOUSING AUTHORITY FUNDS BY PAYING KIM BUSH FOR SERVICES PROVIDED.
- H. IN A CONTINUING COURSE OF CONDUCT FROM 2019 TO 2022 DEFENDANT MISAPPROPRIATED HOUSING AUTHORITY FUNDS BY PAYING STEVEN BUSH FOR SERVICES PROVIDED.
- I. IN A CONTINUING COURSE OF CONDUCT FROM 2019 TO 2022 DEFENDANT MISAPPROPRIATED HOUSING AUTHORITY FUNDS BY PAYING RYAN DANIEL FOR SERVICES PROVIDED.
- J. IN A CONTINUING COURSE OF CONDUCT FROM 2021 TO 2022 DEFENDANT MISAPPROPRIATED HOUSING AUTHORITY FUNDS BY PAYING RYAN DANIEL FOR SALARY AND BACK SALARY WHEN HE WAS NOT AUTHORIZED TO RECEIVE THESE FUNDS.
- K. IN A CONTINUING COURSE OF CONDUCT FROM 2019 TO 2022 DEFENDANT MISAPPROPRIATED HOUSING AUTHORITY FUNDS BY PAYING EMILY COOK FOR SERVICES PROVIDED.
- L. IN A CONTINUING COURSE OF CONDUCT FROM 2019 TO 2022 DEFENDANT MISAPPROPRIATED HOUSING AUTHORITY DHAP FUNDS TO PURCHASE PROPERTY TO BE USED AS AN EMERGENCY SHELTER BUT NEVER USING THE PROPERTY AS AN EMERGENCY SHELTER.

- M. IN A CONTINUING COURSE OF CONDUCT FROM 2019 TO 2022 DEFENDANT WANTED ESD PROPERTY TO BE UTILIZED BY HOUSING AUTHORITY DESPITE DEFENDANT'S CONFLICT OF INTEREST.
- N. DEFENDANT WAS THE LIBERTY COUNTY ELECTIONS ADMINISTRATOR WHILE A COMMISSIONER ON THE HOUSING AUTHORITY WHICH IS IN DIRECT VIOLATION OF THE LAW.
- O. IN A CONTINUING COURSE OF CONDUCT FROM 2019 TO 2022, DEFENDANT REPEATEDLY REFERRED TO THE HOUSING AUTHORITY MONEY AS "HIS" MONEY AND "HE CAN SPEND THE MONEY ANY WAY HE WANTED".
- P. IN A CONTINUING COURSE OF CONDUCT FROM 2019 TO 2022, DEFENDANT REFUSED TO GIVE AUDITORS ACCESS TO THE FINANCIALS OF THE LIBERTY COUNTY HOUSING INC OR CORPORATION.
- Q. IN A CONTINUING COURSE OF CONDUCT FROM 2019 TO 2022, DEFENDANT REFUSED TO GIVE AUDITORS ACCESS TO THE FINANCIALS OF THE LIBERTY COUNTY HOUSING AUTHORITY DEV CORPORATION.
- R. IN A CONTINUING COURSE OF CONDUCT FROM 2019 TO 2022, DEFENDANT STATED THAT THE LIBERTY COUNTY HOUSING AUTHORITY INC / CORPORATION WAS NOT "THAT TYPE OF ACCOUNT" THAT THE AUDITORS WERE ALLOWED TO VIEW FINANCIALS AND WAS A PRIVATE ENTITY.
- S. IN A CONTINUING COURSE OF CONDUCT FROM 2019 TO 2022, DEFENDANT STATED THAT THE LIBERTY COUNTY HOUSING DEV CORPORATION WAS NOT "THAT TYPE OF ACCOUNT" THAT THE AUDITORS WERE ALLOWED TO REVIEW FINANCIALS AND WAS A PRIVATE ENTITY.
- T. ON OR ABOUT OCTOBER 21, 2021, THE DEFENDANT APPROACHED THOMAS "TOMMY" BRENTS KNOWING HE WAS STRUGGLING FINANCIALLY (PER BRENTS). DEFENDANT ASKED BRENTS TO PROVIDE AN INVOICE TO HIM AND BRENTS COMPLIED WITH INVOICE #5261 FROM CYPRITECH IN THE AMOUNT OF \$2,000 FOR "IT CONSULTING". CYPRITECH RECEIPT FROM OCTOBER 22, 2021, SHOWS PAYMENT BEING RECEIVED IN THE AMOUNT OF \$2,000 FROM LIBERTY COUNTY HOUSING, INC. ACCOUNT ENDING IN 2548. PER BRENTS HE DID NOT COMPLETE ANY WORK FOR THE LIBERTY COUNTY

HOUSING AUTHORITY OR THE LIBERTY COUNTY HOUSING INC THAT WARRANTED RECEIVING \$2,000.

- U. ON OR ABOUT AUGUST 13, 2023, WHILE IN THE LIBERTY COUNTY JAIL, DEFENDANT USED AND CREATED CODED MESSAGES IN AN ATTEMPT TO CIRCUMVENT DISCOVERY OF MESSAGES DEFENDANT WAS SENDING OUT.
- V. WHILE ON BOND, DEFENDANT VIOLATED CONDITIONS OF BOND BY COMMUNICATING AND HAVING CONTACT WITH CO-DEFENDANT EMILY COOK REPEATEDLY WHEN THE DEFENDANT'S BOND CONDITIONS PROHIBITED CONTACT.
- W. WHILE ON BOND, DEFENDANT VIOLATED CONDITIONS OF BOND BY DRINKING ALCOHOL.
- X. ON OR ABOUT JUNE 4, 2023, WHILE IN THE LIBERTY COUNTY JAIL, DEFENDANT ADMITTED TO VIOLATING BOND CONDITIONS.
- Y. ON OR ABOUT JUNE - JULY 2023, WHILE IN THE LIBERTY COUNTY JAIL, DEFENDANT STATED "CAN'T TELL THE TRUTH" CONCERNING HIS CHARGES.
- Z. ON OR ABOUT JULY 5, 2023, WHILE IN THE LIBERTY COUNTY JAIL, DEFENDANT RAN A 2 FOR 1 STORE IN VIOLATION OF JAIL POLICIES. DUE TO THE DEFENDANT'S ACTIONS, ANOTHER INMATE WAS PHYSICALLY ASSAULTED.
- AA. WHILE IN THE LIBERTY COUNTY JAIL, DEFENDANT VIOLATED JAIL POLICIES BY USING OTHER INMATES JAIL PHONE ACCESS.
- BB. ON OR ABOUT MAY 16, 2022, DEFENDANT MADE A STATEMENT WHILE ON A JAIL CALL THAT HE REGRETTED PUTTING EMILY COOK ON THE BOARD (OF THE LCHA).
- CC. ON OR ABOUT JUNE 10, 2023, DEFENDANT MADE A STATEMENT WHILE ON A JAIL CALL THAT HE GAVE TOMMY BRENTS MONEY WHEN HE WAS UNEMPLOYED.
- DD. ON OR ABOUT JUNE 4, 2023, DEFENDANT MADE A STATEMENT "WOMEN SHOULDN'T DO CERTAIN THINGS AND BE IN CERTAIN PLACES AND THE BIBLE SAYS SO" WHEN REFERRING TO THE POSITION OF DISTRICT ATTORNEY.

EE. ON OR ABOUT SEPTEMBER 2020, DEFENDANT COORDINATED THE CREATION OF 1923 ENTERPRISES LLC AND LISTED STEPHANIE JOHNSON AS THE OWNER/PRESIDENT OF THE ENTITY.

FF. IN A CONTINUING COURSE OF CONDUCT IN 2021-2022, DEFENDANT USED LIBERTY COUNTY HOUSING AUTHORITY FUNDS TO PAY ATTORNEY FEES IN EXCESS OF \$75,000 WITH THE INTENT TO STOP DELORES MOORE AND ANGELA UNGLES FROM REPORTING THE DEFENDANT'S CRIMINAL ACTIVITY TO LAW ENFORCEMENT AND HUD OIG.

GG. ON OR ABOUT 2019 TO 2022, DEFENDANT OBTAINED DIGITAL AND RECORDING EQUIPMENT FOR THE LIBERTY COUNTY ELECTIONS OFFICE AND GAVE THIS EQUIPMENT TO THE LIBERTY HIGH SCHOOL TEACHER, RICHEY EWING, WITHOUT COUNTY APPROVAL TO DISPENSE WITH THESE ASSETS.

HH. ON OR ABOUT 2019 TO 2022, DEFENDANT OBTAINED HALOGEN LIGHTS FOR THE LIBERTY COUNTY ELECTIONS OFFICE AND GAVE THIS EQUIPMENT TO ESD-7, WITHOUT COUNTY APPROVAL TO DISPENSE WITH THESE ASSETS.

II. ON OR ABOUT BETWEEN 2019 AND 2022, DEFENDANT APPROACHED OEM COORDINATOR, CRISTA BEASLEY-ADAMS, FOR THE DEFENDANT TO PURCHASE NEW EQUIPMENT, NAMELY COMPUTERS FOR THE OEM COMMAND CENTER, FOR THE OFFICE OF EMERGENCY MANAGEMENT WITH "LEFT OVER" FUNDS THE LIBERTY COUNTY HOUSING AUTHORITY HAD FROM HUD DISASTER FUNDS. THE OEM CORRDIATOR REFUSED AS SHE KNEW THIS WAS AN ILLEGAL USE OF THOSE FUNDS.

JJ. ON OR ABOUT SEPTEMBER 18, 2019, DEFENDANT WAS ADVISED THAT HE HAD TO GET OFF OF THE LIBERTY COUNTY HOUSING AUTHORITY BOARD AND THE ESD7 BOARD. DEFENANT WAS APPOINTED AS THE ELECTIONS ADMINISTRATOR AND WAS A COUNTY EMPLOYEE. GOVT CODE PROHIBITS A COUNTY EMPLOYEE TO BE ON SAID BOARDS. THE DEFENDANT FAILED TO RESIGN OR REMOVE HIMSELF IN VIOLATION OF THE LAW.

KK. ON OR ABOUT 2022, WHILE THE ELECTIONS ADMINISTRATOR, DEFENDANT FAILED HIS DUTIES. DEFENDANT WAS RESPONSIBLE TO HANDLE THE COUNTY REDISTRICTING. IT WAS LATER DISCOVERED THAT THE DEFENDANT THE REDISTRICTING WAS DONE INCORRECTLY BY THE DEFENDANT AND ADDITIONALLY THAT THE DEFENDANT PUT CHAMBERS COUNTY VOTERS IN A LIBERTY COUNTY DISTRICT. THIS FAILURE OF DUTIES DIRECTLY EFFECTED A CONTESTED RACE.

LL. ON OR ABOUT 2020, WHILE THE ELECTIONS ADMINISTRATOR, DEFENDANT HIRED EMILY COOK TO BE PAID FOR GRAPHICS SERVICES.

MM. ON OR ABOUT 2020, WHILE THE ELECTIONS ADMINISTRATOR, DEFENDANT ATTEMPTED OR DID HIRE A MASSAGE THERAPIST FOR COUNTY EMPLOYEES.

NN. ON OR ABOUT 2019 TO 2022, WHILE ELECTIONS ADMINISTRATOR, DEFENDANT PAID FAMILY AND FRIENDS WITH COUNTY FUNDS FOR SERVICES NAMELY, CO-DEFENDANT EMILY COOK, STEVEN BUSH, NICHOLAS SYKES, AND RICHEY EWING.

OO. ON OR ABOUT AUGUST AND SEPTEMBER 2021, DEFENDANT NEGOTIATED SELLING CORNELL PROPERTY TO LBRT INVESTMENT COMPANY AND RAN THE BID UP APPROXIMATELY \$15,000 BY FALSELY STATING THERE WERE COMPETING BIDS.

PP. ON OR ABOUT 2019-2022, DEFENDANT REQUESTED TO GO TO A HOUSING AUTHORITY CONFERENCE EARLY AND HAVE LIBERTY COUNTY HOUSING AUTHORITY PAY FOR THE DEFENDANT'S EXTENDED TRIP. THIS REQUEST WAS DENIED.

QQ. ON OR ABOUT JULY 2007, DEFENDANT PURCHASED APPROXIMATELY \$30,000 WORTH OF COMPUTER, ELECTRONIC, TELEVISIONS, AND VIDEO EQUIPMENT KNOWING THAT THE EQUIPMENT WOULD NOT BE PAID FOR BY IMMANUAL HOME HEALTH. PRIOR TO THE DEFENDANT ORDERING THE PROPERTY, THE DEFENDANT WAS PARTY TO THE CONVERSATIONS THAT THE CO-DEFENDANTS FREDRICK RAY AKINS AND EDWARD ROSS SHAUBERGER HAD NO INTENTION TO PAY FOR THE ORDERED EQUIPMENT.

Respectfully submitted,

/s/ Anna Emmons

Anna Emmons
Assistant District Attorney
LIBERTY County, Texas

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that a true and correct copy of the above foregoing motion was sent via eFile to Defense Counsel on this __15__ day of __APRIL__, 2026.

/s/ Anna Emmons

Anna Emmons
Assistant District Attorney
LIBERTY County, Texas

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Anna Emmons on behalf of Anna Emmons
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