

## Jeff Stepp

---

**From:** Jeff Stepp  
**Sent:** Thursday, April 21, 2022 2:11 PM  
**To:** Rep. Andi Story; Rep. David Eastman; Rep. Geran Tarr; Rep. James Kaufman; Rep. Jonathan Kreiss-Tomkins; Rep. Matt Claman; Rep. Sarah Vance  
**Cc:** Rep. Chris Tuck; Michael Mason; Mylar, Sharla Marie (LAW) ; Schroeder, Kaci K (LAW); Danea Burns; David Song; Emma Potter; Greg Smith; Griffin Young; House State Affairs; Jake Almeida; Jerad McClure; LAA Legal; Lori Roland; Lydia Kline; Mathew Simpson; Matthew Harvey; Micaela Bradner; Pamela Goode; Sofia Tenney; Thatcher Brouwer; Xannie Borseth  
**Subject:** H STA | FW: In response to inquiries re HB 66 on 4/19/2022  
**Attachments:** LeDoux Charging Doc..pdf; ST - Indictment (Signed) - (06-02-21)\_Redacted.pdf; ST - Info Adding Misdo Counts to Indictment - (06-02-21)\_Redacted.pdf; ST - Information Summons(07-07-2021)\_Redacted.pdf

Good afternoon,

Please see below re: HB 66.

I will print copies for members and bring to the committee.

---

**From:** Mylar, Sharla Marie (LAW)  
**Sent:** Thursday, April 21, 2022 1:16 PM  
**To:** Rep. Jonathan Kreiss-Tomkins <[Rep.Jonathan.Kreiss-Tomkins@akleg.gov](mailto:Rep.Jonathan.Kreiss-Tomkins@akleg.gov)>  
**Cc:** Stepp, Jeffrey (LEG) <[jeff.stepp@akleg.gov](mailto:jeff.stepp@akleg.gov)>  
**Subject:** In response to inquiries re HB 66 on 4/19/2022

Chair Kreiss-Tomkins,

On Tuesday, the House State Affairs committee considered HB 66 and asked a number of questions about false statements on voting forms and prosecutions for election crimes. In an effort to get back to the Committee as soon as possible, here are some initial responses. If the Committee has additional questions, please let us know.

The Committee asked if there were instances where people have been prosecuted for making false statements on voter forms. There are. In two recent cases, *State v. LeDoux* and *State v. Bell*, the defendants were charged under AS 15.56.040(a)(3), which provides, "A person commits the crime of voter misconduct in the first degree if the person . . . intentionally makes a false affidavit, swears falsely, or falsely affirms under an oath required by this title." The charging and other documents in both cases are attached. In the LeDoux case, the investigation started in 2018 after the Division of Elections identified some irregularities in some of the absentee ballot applications and absentee ballots returned for the primary election for House District 15. Because both the LeDoux and the Bell cases are ongoing, neither the Civil nor the Criminal Division can comment on them further.

The Committee also asked if there were instances where non-citizens intentionally claimed to be citizens on voter forms. The Division is not aware of this happening.

**\*Due to outlook limiting the size of emails and delaying the send of this email, I will send the four documents separately in four additional emails – thank you!\***

**Sharla Mylar**

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE

STATE OF ALASKA,

Plaintiff,

vs.

GABRIELLE R LEDOUX

Defendant

CASE NO. 3AN-20 2172 CR

SUMMONS

To: GABRIELLE R LEDOUX

Home Phone:

Home Address: 8859 Cross Point Loop  
120 4th Street  
Anchorage, AK 99504

OL/ID: [REDACTED]

Work phone:

Work Address:

You are summoned to appear before the District/Superior Court at:

Court Address: Anchorage-Nesbett Courthouse, 825 W 4th Ave, Anchorage, AK  
99501

Date and Time: \_\_\_\_\_

to answer to:

- ☒ the attached charging document.  
☐ a petition to revoke probation.  
☐ a notice of reinstatement of prosecution.  
☐ a charge that you have failed to satisfy your judgment by \_\_\_\_\_

Original Charge: \_\_\_\_\_

If you fail to appear, a warrant will be issued for your arrest.

March 13, 2020

Date



David R. Wallace  
Judge/Deputy Clerk as ordered on record by  
Judge

Wallace  
Type or Print Judge's Name

RETURN OF SUMMONS

I received this summons \_\_\_\_\_, 2020, and served it \_\_\_\_\_, 2020,  
at \_\_\_\_\_ in \_\_\_\_\_, Alaska, by delivering  
(address) (city)

a copy of it and a copy of the charging document to \_\_\_\_\_, the defendant or a  
person of suitable age and discretion residing at the defendant's home or usual place of residence.

Return Date

Signature of Peace Officer

Type or Print Name

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE

STATE OF ALASKA,

Plaintiff,

vs.

LISA M SIMPSON

Defendant

CASE NO. 3AN-20-2173 CR

SUMMONS

To: LISA M SIMPSON

Home Phone:

Home Address: 1221 Boston St. Apt B  
PO Box 241367  
Anchorage, AK 99504

Work phone:

Work Address:

You are summoned to appear before the District/Superior Court at:

Court Address: Anchorage-Nesbett Courthouse, 825 W 4th Ave, Anchorage, AK  
99501

Date and Time: \_\_\_\_\_

to answer to:

- ☒ the attached charging document.  
☐ a petition to revoke probation.  
☐ a notice of reinstatement of prosecution.  
☐ a charge that you have failed to satisfy your judgment by \_\_\_\_\_

Original Charge: \_\_\_\_\_

If you fail to appear, a warrant will be issued for your arrest.

March 13, 2020

Date



[Signature]  
Judge/Deputy Clerk as ordered on record by  
Judge

Wallace  
Type or Print Judge's Name

RETURN OF SUMMONS

I received this summons \_\_\_\_\_, 2020, and served it \_\_\_\_\_, 2020,  
at \_\_\_\_\_ in \_\_\_\_\_, Alaska, by delivering  
(address) (city)

a copy of it and a copy of the charging document to \_\_\_\_\_, the defendant or a  
person of suitable age and discretion residing at the defendant's home or usual place of residence.

Return Date

Signature of Peace Officer

Type or Print Name

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE

STATE OF ALASKA,

Plaintiff,

vs.

CADEN C VAUGHT

Defendant

CASE NO. 3AN-20-2174 CR

SUMMONS

To: CADEN C VAUGHT

Home Phone:

Work phone:

Home Address: 12731 Brandon St.  
Anchorage, AK 99515

Work Address:

You are summoned to appear before the District/Superior Court at:

Court Address: Anchorage-Nesbett Courthouse, 825 W 4th Ave, Anchorage, AK  
99501

Date and Time: \_\_\_\_\_

to answer to:

- ☒ the attached charging document.  
☐ a petition to revoke probation.  
☐ a notice of reinstatement of prosecution.  
☐ a charge that you have failed to satisfy your judgment by \_\_\_\_\_

Original Charge: \_\_\_\_\_

If you fail to appear, a warrant will be issued for your arrest.

March 13, 2020  
Date

David R. Wallace  
Judge/Deputy Clerk as ordered on record by  
Judge

Wallace  
Type or Print Judge's Name



RETURN OF SUMMONS

I received this summons \_\_\_\_\_, 2020, and served it \_\_\_\_\_, 2020,  
at \_\_\_\_\_ in \_\_\_\_\_, Alaska, by delivering  
(address) (city)

a copy of it and a copy of the charging document to \_\_\_\_\_, the defendant or a  
person of suitable age and discretion residing at the defendant's home or usual place of residence.

Return Date

Signature of Peace Officer

Type or Print Name

IN THE DISTRICT COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE

STATE OF ALASKA,

Plaintiff,

vs.

GABRIELLE R LEDOUX

[REDACTED]

LISA M SIMPSON

[REDACTED]

CADEN C VAUGHT

[REDACTED]

Defendants.

STATE OF ALASKA, THIRD DISTRICT  
MAR 13 2020  
Clerk of the Trial Courts

3AN-18-2715 SW; 3AN-18-2716 SW; 3AN-18-2717 SW; 3AN-18-2718 SW; 3AN-18-2719 SW; 3AN-18-2720 SW; 3AN-18-2721 SW; 3AN-18-2722 SW; 3AN-18-2723 SW; 3AN-18-2724 SW; 3AN-18-2725 SW; 3AN-18-2726 SW; 3AN-18-2727 SW; 3AN-18-2728 SW; 3AN-18-2729 SW; 3AN-18-2965 SW; 3AN-18-2966 SW; 3AN-18-2967 SW; 3AN-18-2968 SW; 3AN-18-2969 SW; 3AN-18-2970 SW; 3AN-18-2971 SW; 3AN-18-3157 SW; 3AN-18-3158 SW; 3AN-18-3160 SW; 3AN-18-3161 SW; 3AN-18-3162 SW

No. 3AN-20-272 CR (Gabrielle R LeDoux)

No. 3AN-20-273 CR (Lisa M Simpson)

No. 3AN-20-274 CR (Caden C Vaught)

INFORMATION

3AN-20-2M2  
2173 CR  
2174

I certify this document and its attachments do not contain the (1) name of a victim of a sexual offense listed in AS 12.61.140 or (2) residence or business address or telephone number of a victim of or witness to any offense unless it is an address identifying the place of a crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court. The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990: NONE

Count I - AS 15.56.040

Voter Misconduct 1

Gabrielle R LeDoux - 001, Lisa M Simpson - 001

Count II - AS 15.56.040

Voter Misconduct 1

Lisa M Simpson - 002, Caden C Vaught - 001

Count III - AS 15.56.040

Voter Misconduct 1

Lisa M Simpson - 003, Caden C Vaught - 002

Count IV - AS 15.56.040

Voter Misconduct 1

Caden C Vaught - 003

Count V - AS 15.56.040

Voter Misconduct 1

Caden C Vaught - 004

Count VI - AS 15.56.050

Voter Misconduct 2

Gabrielle R LeDoux - 002, Lisa M Simpson - 004

Count VII - AS 15.56.050

Voter Misconduct 2

Caden C Vaught - 005

Count VIII - AS 15.56.050

Voter Misconduct 2

Caden C Vaught - 006

Count IX - AS 15.56.050

Voter Misconduct 2

Gabrielle R LeDoux - 003, Lisa M Simpson - 005

Count X - AS 15.56.050

Voter Misconduct 2

3AN-20-2172  
2175  
2174

Caden C Vaught - 007

Count XI - AS 15.56.050

Voter Misconduct 2

Caden C Vaught - 008

Count XII - AS 15.56.035

Unlawful Interference W/ Voting 2

Gabrielle R LeDoux - 004

Count XIII - AS 15.56.035

Unlawful Interference W/ Voting 2

Gabrielle R LeDoux - 005, Lisa M Simpson - 006

Count XIV - AS 15.56.035

Unlawful Interference W/ Voting 2

Gabrielle R LeDoux - 006, Lisa M Simpson - 007

Count XV - AS 15.56.035

Unlawful Interference W/ Voting 2

Gabrielle R LeDoux - 007

Count XVI - AS 15.56.035

Unlawful Interference W/ Voting 2

Gabrielle R LeDoux - 008

Count XVII - AS 15.56.035

Unlawful Interference W/ Voting 2

Gabrielle R LeDoux - 009

Count XVIII - AS 15.56.035

Unlawful Interference W/ Voting 2

Gabrielle R LeDoux - 010

THE OFFICE OF SPECIAL PROSECUTIONS CHARGES:

COUNT I

That in the Third Judicial District, State of Alaska, on or about July 18, 2018, at or near Anchorage, Alaska GABRIELLE R. LEDOUX and LISA M. SIMPSON, while

3AN-20-2112  
2173  
2174

1 acting as principals or accomplices, intentionally made a false affidavit, swore falsely, or  
2 falsely affirmed under an oath required by Title 15, to wit: falsely filled out Simpson's  
3 voter registration application.

4 All of which is a Class C Felony offense being contrary to and in violation of AS  
5 15.56.040 and against the peace and dignity of the State of Alaska.

6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
COUNT II

That in the Third Judicial District, State of Alaska, on or about June 17, 2018, at  
or near Anchorage, Alaska, LISA M. SIMPSON and CADEN C. VAUGHT, while acting  
as principals or accomplices, intentionally made a false affidavit, swore falsely, or falsely  
affirmed under an oath required by Title 15, to wit: falsely filled out Vaught's voter  
registration application.

All of which is a Class C Felony offense being contrary to and in violation of AS  
15.56.040 and against the peace and dignity of the State of Alaska.

COUNT III

That in the Third Judicial District, State of Alaska, on or about September 28,  
2018, at or near Anchorage, Alaska, LISA M. SIMPSON and CADEN C. VAUGHT,  
while acting as principals or accomplices, intentionally made a false affidavit, swore  
falsely, or falsely affirmed under an oath required by Title 15, to wit: falsely filled out  
Vaught's voter registration application.

All of which is a Class C Felony offense being contrary to and in violation of AS  
15.56.040 and against the peace and dignity of the State of Alaska.

COUNT IV

That in the Third Judicial District, State of Alaska, on or about August 21, 2018,  
at or near Anchorage, Alaska, CADEN C. VAUGHT intentionally made a false affidavit,  
swore falsely, or falsely affirmed under an oath required by Title 15, to wit: signing under  
oath when voting a questioned ballot in the 2018 primary election.

1 All of which is a Class C Felony offense being contrary to and in violation of AS  
2 15.56.040 and against the peace and dignity of the State of Alaska.

3 COUNT V

4 That in the Third Judicial District, State of Alaska, on or about November 6,  
5 2018, at or near Anchorage, Alaska, CADEN C. VAUGHT intentionally made a false  
6 affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to wit:  
7 signing under oath when voting a questioned ballot in the 2018 general election.

8 All of which is a Class C Felony offense being contrary to and in violation of AS  
9 15.56.040 and against the peace and dignity of the State of Alaska.

10 COUNT VI

11 That in the Third Judicial District, State of Alaska, on or about July 18, 2018, at  
12 or near Anchorage, Alaska, GABRIELLE R. LEDOUX and LISA M. SIMPSON, while  
13 acting as principals or accomplices, registered Simpson to vote without being entitled to  
14 register under AS 15.07.030.

15 All of which is a Class A Misdemeanor offense being contrary to and in  
16 violation of AS 15.56.050(a)(1) and against the peace and dignity of the State of Alaska.

17 COUNT VII

18 That in the Third Judicial District, State of Alaska, on or about June 17, 2018, at  
19 or near Anchorage, Alaska, CADEN C. VAUGHT registered to vote without being  
20 entitled to register under AS 15.07.030.

21 All of which is a Class A Misdemeanor offense being contrary to and in  
22 violation of AS 15.56.050(a)(1) and against the peace and dignity of the State of Alaska.

23 COUNT VIII

24 That in the Third Judicial District, State of Alaska, on or about September 28,  
25 2018, at or near Anchorage, Alaska, CADEN C. VAUGHT registered to vote without  
26 being entitled to register under AS 15.07.030.  
27

34V-20-272  
2173 CR  
2174

1 All of which is a Class A Misdemeanor offense being contrary to and in  
2 violation of AS 15.56.050(a)(1) and against the peace and dignity of the State of Alaska.

3  
4 COUNT IX

5 That in the Third Judicial District, State of Alaska, on or about July 18, 2018, at  
6 or near Anchorage, Alaska, GABRIELLE R. LEDOUX and LISA M. SIMPSON, while  
7 acting as principals or accomplices, knowingly made a material false statement while  
8 applying for voter registration or reregistration.

9 All of which is a Class A Misdemeanor offense being contrary to and in  
10 violation of AS 15.56.050(a)(2) and against the peace and dignity of the State of Alaska.

11 COUNT X

12 That in the Third Judicial District, State of Alaska, on or about June 17, 2018, at  
13 or near Anchorage, Alaska, CADEN C. VAUGHT knowingly made a material false  
14 statement while applying for voter registration or reregistration.

15 All of which is a Class A Misdemeanor offense being contrary to and in  
16 violation of AS 15.56.050(a)(2) and against the peace and dignity of the State of Alaska.

17 COUNT XI

18 That in the Third Judicial District, State of Alaska, on or about September 28,  
19 2018, at or near Anchorage, Alaska, CADEN C. VAUGHT knowingly made a material  
20 false statement while applying for voter registration or reregistration.

21 All of which is a Class A Misdemeanor offense being contrary to and in  
22 violation of AS 15.56.050(a)(2) and against the peace and dignity of the State of Alaska.

23 COUNT XII

24 That in the Third Judicial District, State of Alaska, on or about July 18, 2018, at  
25 or near Anchorage, Alaska, GABRIELLE R. LEDOUX knowingly solicited or  
26  
27

34N-20-2172  
2173  
2174

1 encouraged, directly or indirectly, a registered voter who is no longer qualified to vote  
2 under AS 15.05.010, to vote in an election, to wit: LISA SIMPSON.

3 All of which is a Class A Misdemeanor offense being contrary to and in  
4 violation of AS 15.56.035 and against the peace and dignity of the State of Alaska.

5  
6 COUNT XIII

7 That in the Third Judicial District, State of Alaska, on or about August 19, 2018,  
8 at or near Anchorage, Alaska, GABRIELLE R. LEDOUX and LISA M. SIMPSON,  
9 while acting as principals or accomplices, knowingly solicited or encouraged, directly or  
10 indirectly, a registered voter who is no longer qualified to vote under AS 15.05.010, to  
11 vote in an election, to wit CADEN C. VAUGHT in the 2018 primary election.

12 All of which is a Class A Misdemeanor offense being contrary to and in  
13 violation of AS 15.56.035 and against the peace and dignity of the State of Alaska.

14 COUNT XIV

15 That in the Third Judicial District, State of Alaska, on or about September 25,  
16 2018, at or near Anchorage, Alaska, GABRIELLE R. LEDOUX and LISA M.  
17 SIMPSON, while acting as principals or accomplices, knowingly solicited or  
18 encouraged, directly or indirectly, a registered voter who is no longer qualified to vote  
19 under AS 15.05.010, to vote in an election, to wit CADEN C. VAUGHT in the 2018  
20 general election.

21 All of which is a Class A Misdemeanor offense being contrary to and in  
22 violation of AS 15.56.035 and against the peace and dignity of the State of Alaska.

23 COUNT XV

24 That in the Third Judicial District, State of Alaska, on or about July 18, 2018, at  
25 or near Anchorage, Alaska, GABRIELLE R. LEDOUX knowingly solicited or  
26 encouraged, directly or indirectly, a registered voter who is no longer qualified to vote  
27

3AIV-20+2172  
21751  
217-1C

1 under AS 15.05.010, to vote in an election, to wit Patrick Simpson in the 2018 primary  
2 election.

3 All of which is a Class A Misdemeanor offense being contrary to and in  
4 violation of AS 15.56.035 and against the peace and dignity of the State of Alaska.

5  
6 COUNT XVI

7 That in the Third Judicial District, State of Alaska, on or about September 25,  
8 2018, at or near Anchorage, Alaska, GABRIELLE R. LEDOUX knowingly solicited or  
9 encouraged, directly or indirectly, a registered voter who is no longer qualified to vote  
10 under AS 15.05.010, to vote in an election, to wit Patrick Simpson in the 2018 general  
11 election.

12 All of which is a Class A Misdemeanor offense being contrary to and in violation  
13 of AS 15.56.035 and against the peace and dignity of the State of Alaska.

14  
15 COUNT XVII

16 That in the Third Judicial District, State of Alaska, on or about November 3,  
17 2014, at or near Anchorage, Alaska, GABRIELLE R. LEDOUX knowingly solicited or  
18 encouraged, directly or indirectly, a registered voter who is no longer qualified to vote  
19 under AS 15.05.010, to vote in an election, to wit: Dot Helgason in the 2014 general  
20 election.

21 All of which is a Class A Misdemeanor offense being contrary to and in violation  
22 of AS 15.56.035 and against the peace and dignity of the State of Alaska.

23  
24 COUNT XVIII

25 That in the Third Judicial District, State of Alaska, on or about October 21,  
26 2014, at or near Anchorage, Alaska, GABRIELLE R. LEDOUX knowingly solicited or  
27 encouraged, directly or indirectly, a registered voter who is no longer qualified to vote  
under AS 15.05.010, to vote in an election, to wit: Bonnie Bailey in the 2014 general  
election.

3AV-20-2172CR  
2173 CR  
2174CR

1 All of which is a Class A Misdemeanor offense being contrary to and in  
2 violation of AS 15.56.035 and against the peace and dignity of the State of Alaska.

3 The undersigned swears under oath this Information is based upon a review of  
4 reports drafted in Alaska State Trooper case number AK18059736 submitted to date, a  
5 review of evidence collected and conversations with involved investigators.

6 On August 16, 2018, the Division of Elections ("DOE") notified the Alaska State  
7 Troopers ("AST") that there appeared to be irregularities with a number of applications  
8 for absentee ballots for the upcoming Primary Election, which was to be held on August  
9 21, 2018. Those irregularities focused attention on the House District 15 Republican  
10 primary. AST investigators worked with the Alaska Division of Elections to determine if  
11 there was a common cause for, or link, between the significant number of irregularities.  
12 Voter records from the last several election cycles were examined, voters were contacted  
13 in person and over the phone, and over 25 search warrants were obtained between August  
14 16, 2018 and November 30, 2018. The FBI joined the investigation at the end of  
15 November, 2018.

16 As part of the ongoing investigation, investigators attempted to contact Gabrielle  
17 LeDoux, one of the candidates in the Republican primary for House District 15.  
18 Investigators also attempted to contact several people known to have worked or helped  
19 on LeDoux's campaign, including Lisa (Vaught) Simpson, a friend of LeDoux's who  
20 previously worked for LeDoux as her chief of staff and was listed as a LeDoux campaign  
21 official with APOC in some capacity in several election cycles. Text messages to and  
22 from LeDoux and others, including Simpson, were also collected pursuant to search  
23 warrants. These texts raised concerns that LeDoux had solicited and/or encouraged  
24 people who did not live in her district to vote in the House District 15 primary and  
25 general elections in 2018 and 2014.

26 Investigators determined that Simpson registered to vote in House District 15 on  
27 July 18, 2018, by filling out and mailing a voter registration application to DOE.  
Simpson voted in person at a House District 15 precinct polling place in both the 2018

SW-20-2172 CR  
2173CR  
2174CR

primary and general elections (held on August 21 and November 6, respectively). Simpson's adult son, Caden Vaught, also registered to vote in the House District 15 primary and general elections (Vaught submitted three separate voter registration applications between June and September 2018, two of the registrations listed an address within House District 15).

In order to register to vote, a voter must fill out a voter registration form; this form requires the person to provide, amongst other information, their name and residence address. Those details are required to be provided by law. The Alaska Constitution, Article V, Sec. 1 requires that: "A voter shall have been, immediately preceding the election, a thirty day resident of the election district in which he seeks to vote . . ."

Alaska Statute 15.05.020 defines residence by setting forth the parameters, including, in pertinent part:

The residence of a person is that place in which the person's habitation is fixed, and to which, whenever absent, the person has the intention to return. If a person resides in one place, but does business in another, the former is the person's place of residence. Temporary work sites do not constitute a dwelling place.

....

A person does not gain residence in any place to which the person comes without the present intention to establish a permanent dwelling at that place.

....

The term of residence is computed by including the day on which the person's residence begins and excluding the day of election.

Everyone who registers to vote must sign the following certification as part of their voter registration application:

**Voter Certificate: Read and Sign:** I certify, under penalty of perjury, that the above information I provided on this document is true and correct. I am not registered to vote in another state, or I have provided information to cancel that registration. I further certify that I am a resident of Alaska and I have not been convicted of a felony, or having been so convicted, have been unconditionally discharged from incarceration, probation and/or parole.

2172 CR  
2173 CR  
2174 CR

**WARNING:** If you provide false information on this application you can be convicted of a misdemeanor AS 15.56.050.

Caden Vaught voted in House District 15 in both the 2018 primary and general elections by what is called a "questioned ballot." A questioned ballot is used when the status of an in-person voter cannot be immediately verified through records on Election Day. A person using such a ballot must sign an additional, but similar, oath prior to voting:

*I swear or affirm, under penalty of perjury, that:* The information on this form is true, accurate and complete to the best of my knowledge. I further certify that I am a resident of Alaska and I have not been convicted of a felony, or having been so convicted, have been unconditionally discharged from incarceration, probation, and/or parole. I am not registered to vote in another state, or I have taken the necessary steps to cancel that registration. I am or have been a registered voter in Alaska at some time in the last 4 years or am newly registering. I have not and will not vote in any other manner in this election.

Simpson submitted a voter registration application she signed on July 18, 2018. In her application, she listed her address of residence as a particular unit of a triplex located on Boston Street, which is in House District 15. Simpson signed the form below the oath acknowledging that she was swearing to its contents under penalty of perjury. LeDoux signed the registration form as the registrar.<sup>1</sup> Simpson voted in person at a House District 15 precinct in both the primary and general election cycles. Simpson could only lawfully vote in House District 15 using the Boston Street address if she had legally established that location as her residence within at least thirty days of the election.

Investigators pulled records to verify where Simpson lived between July and November of 2018. Three different relevant addresses were found when reviewing records: residences on Shoshoni Avenue, Dorbrandt Street, and Boston Street.

<sup>1</sup> Registrars are qualified voters authorized by the Division of Elections to assist with the completion and verification of an applicant's identity and the submission of voter registration forms to the Division of Elections. Registrars are able to act as "witnesses" for voters signing their application; those applications that are witnessed by a registrar become effective on the day the voter registration application is signed, instead of the day the division receives it.

SNV-20-2172 CR  
2173 CR  
2174 CR

Shoshoni Avenue:

Public records showed that Simpson's husband, Patrick Simpson, had owned a residential property on Shoshoni Avenue in Anchorage since at least 2017. This address is not within House District 15.

Dorbrandt Street:

Lisa Simpson owned a triplex on Dorbrandt St. prior to June 2018. In June 2018, ownership of that triplex was converted to an LLC (with the name of the property's address as its title). The LLC, jointly owned by Lisa and Patrick Simpson, was described as being a lessor of residential buildings and dwellings and listed the Simpson's Shoshoni Avenue address as the LLC's physical address. The Dorbrandt triplex is not in House District 15.

Boston Street:

Public records also indicated that on August 14, 2018, the Simpsons purchased a triplex on Boston Street. That triplex is located in House District 15.

On her July voter registration application, Lisa Simpson listed Unit C in the Boston Street residence as her residence address. The Simpsons did not own the Boston residence at that time. According to Chugach Electric Service records, someone other than Patrick or Lisa Simpson took over payment responsibility for the services at Unit C of the Boston residence (the unit Lisa Simpson claimed as her residence) on October 30, 2018. Based on available records, it appears that this person was a tenant renting the unit from the Simpsons.

PFD records indicate that Simpson used the Dorbrandt Street address on the PFD application she filed on March 18, 2018 for both her mailing and physical address. Simpson used the Shoshani address for her physical address (with a PO Box as her mailing address) on her PFD application filed on March 5, 2019.

In early 2019, investigators obtained a search warrant to seize and search LeDoux's phone and certain email messages. Once the documents were available for review, they were screened by the U.S. Department of Justice in a process called a "taint review" to ensure the contents did not include privileged information, such as

SYV-20-2172 LA  
2173 CR  
2174 CR

1 communications with attorneys. This review was conducted by individuals not connected  
2 to the prosecution team in order to ensure that members of the prosecution team did not  
3 review or come into possession of privileged material. The contents of the phone and  
4 email search were shared with members of the state prosecution team towards the end of  
5 February in 2020.

6 On July 18, 2018 (the same day Lisa Simpson registered to vote using the Boston  
7 address as her residence address) LeDoux sent the following text to Simpson: "Did you  
8 fill out the voter registration form? Will Pat do one also." Simpson replied "Yes, I filled  
9 out the voter registration. Pat doesn't want to do it until we close on the property." In the  
10 two days immediately before the primary election, LeDoux sent several texts to Simpson  
11 inquiring about the status of Caden Vaught's application, noting that he "is NOT on list  
12 of people who requested absentees."<sup>2</sup> On the day of the primary, August 21, LeDoux  
13 texted Simpson and informed her that Vaught had submitted a new voter form moving his  
14 residence to the Dorbrandt address, which (as LeDoux noted in the text) was in House  
15 District 23.

16 On September 25 and 27 of 2018, after the primary but before the general election,  
17 LeDoux sent three texts to Simpson about getting Vaught and Patrick Simpson registered  
18 in her district: "We have got to get Caden and hopefully Pat reregistered by October 7";  
19 "Can you get Caden and hopefully Patrick reregistered by end of next week?"; "And can  
20 you get Caden registered in the district." Simpson responded on September 27 by  
21 stating: "Yes, I can reregister Caden but not Pat. He won't unless he actually lives there  
22 and we don't yet." On the 28th, LeDoux asked for Simpson's address and stated "Maybe  
23 I can reregister Caden when I see him." Simpson responded "You can register Caden at  
24 [the specific address on] Lori Drive."  
25

26 <sup>2</sup> As is discussed in more detail below, Vaught's initial voter application, on June 17, would have ensured he  
27 received a House District 15 ballot. However, his second application, signed on July 12 (more than 30 days prior to  
the primary election), in which he listed the Dorbrandt address switched his registration to House District 23. Thus,  
based on the subsequent application, he was not on the list of eligible House District 15 voters in August of 2018.

SN-20-2172 CR  
2173 CR  
2174 CR

1 On December 4, 2018, after both elections were over, LeDoux texted Simpson and  
2 asked "Have you moved in at Boston Street." Simpson responded, "We are still trying to  
3 get [a tenant out]. I think she is physically gone but all her stuff is still there and it stinks.  
4 We went to court, have given her numerous chances and I'm having the locks changed  
5 today. She hasn't paid any rent for 3 months!" Moreover, as described above, an  
6 apparent tenant had taken over financial responsibilities in October for the unit Simpson  
7 claimed as her residence when voting. In summary, the Simpsons did not own the  
8 Boston triplex at the time Lisa Simpson filled out her voter registration application in  
9 July 2018—and at the time of the general election, a tenant had, eight days prior, signed a  
10 contract for utilities for the unit Simpson claimed to live in. A review of other text  
11 messages on Simpson's phone provided additional indication that the Simpsons were  
12 living at the Shoshoni residence during the latter part of 2018 and into 2019, not the  
13 Boston triplex.

13 Caden Vaught submitted three voter registration applications during the 2018  
14 election cycle; each form includes language that it is signed under penalty of perjury.  
15 Vaught's first application was signed on June 17, 2018 with a listed residence address on  
16 Lori Drive (which is in House District 15). Simpson is the listed registrar on this form.

17 Vaught's second application was signed on July 12, 2018 with a residence address  
18 on Dorbrandt Street (the same address as the residence that Lisa Simpson owns; this  
19 residence is not in House District 15). On this form, Vaught listed the Lori address as his  
20 mailing address.

21 Vaught's third voter registration application was signed on September 28, 2018,  
22 (after the primary but before the general election—and the day after Simpson texted  
23 LeDoux to say she would re-register Vaught) and listed a residence on Lori Drive as his  
24 address. It appears that LeDoux signed this third application as the registrar.

25 Vaught voted in both the primary and general election by questioned ballot in  
26 person at a House District 15 polling place. Each time, he signed the certification  
27 verifying under penalty of perjury that the information he provided was accurate. In both

SW-20-2172CR  
2173 CR  
2174 CR

1 the primary election on August 21, 2018 and the general election on November 6, 2018,  
2 Vaught listed and certified under oath that his residence address was on Lori Drive.

3 On March 28, 2019, Caden Vaught was interviewed by the FBI. Vaught said that  
4 in November of 2015 he moved to the Lori address (which is in House District 15) and  
5 lived with his brother and sister-in-law, Charles and Bethany Vaught. Vaught reported  
6 that he lived at Lori until approximately August 2016.

7 Vaught reported that he moved back in with his mom at the Dorbrandt residence in  
8 August of 2016 and lived there until he went to the Alaska Military Youth Academy.  
9 Vaught reported that he spent five and a half months at the Youth Academy during 2018.  
10 The Dorbrandt residence is not in House District 15.

11 Vaught said that when he returned from the Youth Academy, he moved into a  
12 residence on Brandon Street with his fiancée on Aug. 27, 2018. This address is not in  
13 House District 15.

14 Vaught said his mom filled out his first voter application (on June 17) while he  
15 was at the Youth Academy, but that he signed it. Vaught said that he filled out and  
16 signed the other two voter applications. He reported that he was attending the Alaska  
17 Military Youth Academy at the time he filled out his second application; the Dorbrandt  
18 address he provided was where he lived with his mom prior to leaving for the Youth  
19 Academy. By the time he filled out the third application, Vaught was living at the  
20 Brandon Street residence.

21 Vaught acknowledged that he did not live at the Lori Drive residence at the time  
22 that he signed or submitted any of the three applications. A review of Vaught's PFD  
23 applications corroborates the timeline he provided to the FBI, as his PFD records show  
24 that Vaught listed the Dorbrandt Street address as his mailing and physical address on his  
25 March 19, 2018 application and the Brandon Street address on his March 5, 2019  
26 application.

27 Charles and Bethany Vaught were interviewed on March 28, 2019 and reported  
that Caden Vaught lived with them in 2015, but that he had not lived with them for about  
two years—and that he was not living with them during any of the time period

SNV-20-21720  
217 3 CR  
2174 CR

1 surrounding the 2018 elections. Charles and Bethany confirmed the general timeline that  
2 Caden Vaught provided to the FBI as to where he was living.

3 Additional information was discovered during a review of LeDoux's phones.  
4 Multiple text messages were found that showed that LeDoux requested at least two  
5 people to vote in her district—despite their having told LeDoux that they no longer lived  
6 in the district.

7 On November 3, 2014—the day before the election—LeDoux sent two relevant  
8 messages to Helgason, one at 0642 hours:

9 Dot. I have not seen your name I the list of people who have requested absentee  
10 ballots. TODAY at 5 pm Alaska standard time is the last day to request a ballot.  
11 You can only request now through fax or online. This is going to b a VERY  
12 CLOSE election and I am going to really NEED your vote. Can u please request a  
13 ballot TODAY.

14 And a second at 1234 hours:

15 Dot, don't worry about the legality of this. Remember when I wanted to challenge  
16 people 4 years ago the division of elections was simply not interested. You own  
17 the place so you clearly have the right to claim it as your residence. At this point  
18 you would not even b able to vote in the district where u r living because u r not  
19 registered there. So PLEASE go on line and request a ballot.

20 Helgason did not vote in the 2014 election in House District 15.

21 Helgason was contacted on March 6, 2020. She reported that she did not recall  
22 LeDoux asking her by text to vote in House District 15. According to Helgason, she  
23 moved from her residence in House District 15 a year or two prior to the 2014 election  
24 but had not changed her voter registration. Public records indicated that Helgason did  
25 continue to own a residence in House District 15 through January of 2015, but according  
26 to Helgason she did not reside in that residence in November of 2014 (or at any point in  
27 2014). Despite indicating that she did not recall the text message exchange, Helgason  
reported that when LeDoux texted her about being registered to vote in House District 15,  
she believed that LeDoux was just telling her so she could vote.

On October 21, 2014, LeDoux sent a text to Bonnie Bailey, stating:

3AN-20-2172  
2173  
2174  
KR  
CR  
CR

1 2117hrs – LeDoux to Bailey “Hi Bonnie. Where r you and josh living these days.  
2 U r still registered in my district and would really appreciate it if you would vote  
3 here. I am in a real tight race. I can send you absentee ballot applications if you  
4 give me your new address.”

4 By asking for Bailey’s new address, LeDoux indicated she knew Bailey had moved.  
5 Bailey confirmed this by sending texts at 2206 hours that stated “I’m living in midtown”<sup>3</sup>  
6 and “But I think I can still vote east side.” LeDoux responded at 2208 hours by stating:  
7 “You should still vote here. You and josh are still registered here, u can change your  
8 registration after the election.” On October 27, 2014, LeDoux encouraged Bailey to vote  
9 early, apparently to avoid going “back to the eastside.”<sup>4</sup>

10 Bailey was interviewed by investigators on March 5, 2020. She acknowledged  
11 that she knew LeDoux from Kodiak and that LeDoux was one of her mother’s friends  
12 growing up. When shown the text messages, Bailey reported that she did not believe the  
13 text messages were correct. Bailey stated that at the time she was going through a  
14 separation and her husband was living in the district, but that she was not in a permanent  
15 residence. Bailey reported that LeDoux had come to Bailey’s temporary residence,  
16 which was not in the district, around the time of the texts. Bailey also reported that she  
17 had suggested something to LeDoux and LeDoux stated that she could not do it because  
18 Bailey did not live in her district. Bailey stated that she did not believe that LeDoux  
19 would ask Bailey to vote in her district unless she was living in the district. Bailey  
20 reported that she does not believe that the text messages accurately reflect what LeDoux  
21 said and claimed she had conversations with LeDoux where LeDoux told Bailey not to  
22 vote in her district.

23  
24  
25  
26 <sup>3</sup> The area commonly known as “midtown” falls outside of the boundaries of House District 15.

27 <sup>4</sup> The message is somewhat unclear, but states: “Since things are so hectic for you guys you should consider voting  
early at the muni or the division of elections so u would have to ce back to the eastside, this election is going to b  
close so every vote will count.”

SAV-20-2172 CR  
2173 CR  
2174 CR

1 All of the text messages reviewed were downloaded from LeDoux's cell phone in  
2 a manner that protected the integrity of the data on the phone. In other words, when the  
3 phones were imaged and downloaded, the information was pulled from the phones in an  
4 identical version as was stored on the device. No material was altered or manipulated in  
5 any way when the phone was downloaded, and a full and accurate replication of the data  
6 stored on the device is made and saved.

7  
8 BAIL INFORMATION

9 Per the Alaska Public Safety Information Network, none of the defendants have  
10 criminal convictions in Alaska.

11 Dated at Anchorage, Alaska, this 13th day of March, 2020.

12  
13 KEVIN G. CLARKSON  
14 ATTORNEY GENERAL

15  
16 By: Jenna Gruenstein  
17 Jenna L. Gruenstein  
18 Assistant Attorney General  
19 Alaska Bar No. 0912086  
20  
21  
22  
23  
24  
25  
26  
27

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE

STATE OF ALASKA,

Plaintiff,

vs.

GABRIELLE RUTH LEDOUX

LISA MYLINDA SIMPSON

CADEN CODY VAUGHT

Defendants.

Court No. 3AN-20-02172CR (Gabrielle Ruth LeDoux)

No. 3AN-20-02173CR (Lisa Mylinda Simpson)

No. 3AN-20-02174CR (Caden Cody Vaught)

INDICTMENT

I certify this document and its attachments do not contain the (1) name of a victim of a sexual offense listed in AS 12.61.140 or (2) residence or business address or telephone number of a victim of or witness to any offense unless it is an address identifying the place of a crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court. The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990:

Count I - AS 15.56.040

Voter Misconduct 1

Gabrielle Ruth LeDoux - 001, Lisa Mylinda Simpson - 001

1 Count II - AS 15.56.040  
2 Voter Misconduct 1  
3 Gabrielle Ruth LeDoux - 011, Lisa Mylinda Simpson - 002, Caden Cody Vaught - 001

4 Count III - AS 15.56.040  
5 Voter Misconduct 1  
6 Gabrielle Ruth LeDoux - 012, Lisa Mylinda Simpson - 003, Caden Cody Vaught - 002

7 Count IV - AS 15.56.040  
8 Voter Misconduct 1  
9 Gabrielle Ruth LeDoux - 013, Lisa Mylinda Simpson - 008, Caden Cody Vaught - 003

10 Count V - AS 15.56.040  
11 Voter Misconduct 1  
12 Gabrielle Ruth LeDoux - 014, Lisa Mylinda Simpson - 009, Caden Cody Vaught - 004

13 THE GRAND JURY CHARGES:

14 COUNT I:

15 That in the Third Judicial District, State of Alaska, on or about July 18, 2018, at  
16 or near Anchorage, Alaska GABRIELLE R. LEDOUX and LISA M. SIMPSON, while  
17 acting as principals or accomplices, intentionally made a false affidavit, swore falsely, or  
18 falsely affirmed under an oath required by Title 15, to wit: falsely filled out Simpson's  
19 voter registration application.

20 All of which is a Class C Felony offense being contrary to and in violation of  
21 AS 15.56.040 and against the peace and dignity of the State of Alaska.

22 COUNT II:

23 That in the Third Judicial District, State of Alaska, on or about June 17, 2018, at  
24 or near Anchorage, Alaska GABRIELLE R. LEDOUX, LISA M. SIMPSON and  
25 CADEN C. VAUGHT, while acting as principals or accomplices, intentionally made a  
26 false affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to

wit: falsely filled out Vaught's voter registration application.

All of which is a Class C Felony offense being contrary to and in violation of AS 15.56.040 and against the peace and dignity of the State of Alaska.

COUNT III:

That in the Third Judicial District, State of Alaska, on or about September 28, 2018, at or near Anchorage, Alaska GABRIELLE R. LEDOUX, LISA M. SIMPSON and CADEN C. VAUGHT, while acting as principals or accomplices, intentionally made a false affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to wit: falsely filled out Vaught's voter registration application.

All of which is a Class C Felony offense being contrary to and in violation of AS 15.56.040 and against the peace and dignity of the State of Alaska.

COUNT IV:

That in the Third Judicial District, State of Alaska, on or about August 21, 2018, at or near Anchorage, Alaska, GABRIELLE R. LEDOUX, LISA M. SIMPSON and CADEN C. VAUGHT, while acting as principals or accomplices, intentionally made a false affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to wit: signing under oath when voting a questioned ballot in the 2018 primary election.

All of which is a Class C Felony offense being contrary to and in violation of AS 15.56.040 and against the peace and dignity of the State of Alaska.

COUNT V:

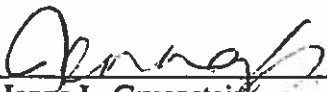
That in the Third Judicial District, State of Alaska, on or about <sup>November 6</sup> ~~August 21~~, 2018, at or near Anchorage, Alaska, GABRIELLE R. LEDOUX, LISA M. SIMPSON and CADEN C. VAUGHT, while acting as principals or accomplices, intentionally made a false affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to wit: signing under oath when voting a questioned ballot in the 2018 general election.

1 All of which is a Class C Felony offense being contrary to and in violation of  
2 AS 15.56.040 and against the peace and dignity of the State of Alaska.

3 DATED this 2nd day of June, 2021 at Anchorage, Alaska.

4  
5 A true bill

6   
7 Grand Jury Foreperson

8   
9 Jenna L. Gruenstein  
10 Chief Assistant Attorney General  
11 Alaska Bar No. 0912086

12 WITNESSES EXAMINED BEFORE THE GRAND JURY:

13 Carol Thompson  
14 Sgt. Nathan Lee Bucknall  
15 Marlene Paktotak  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE

STATE OF ALASKA,

Plaintiff,

vs.

GABRIELLE RUTH LEDOUX

[REDACTED]

LISA M SIMPSON

[REDACTED]

CADEN C VAUGHT

[REDACTED]

Defendants.

No. 3AN-20-02172CR (Gabrielle Ruth LeDoux)

No. (Lisa M Simpson)

No. (Caden C Vaught)

INFORMATION ADDING MISDEMEANOR COUNTS TO INDICTMENT

I certify this document and its attachments do not contain the (1) name of a victim of a sexual offense listed in AS 12.61.140 or (2) residence or business address or telephone number of a victim of or witness to any offense unless it is an address identifying the place of a crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court. The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990: NONE

Count VI - AS 15.56.050

Voter Misconduct 2

Gabrielle Ruth LeDoux - 002, Lisa Mylinda Simpson - 004

Count VII - AS 15.56.050

1 Voter Misconduct 2  
Caden Cody Vaught - 005  
2  
3 Count VIII - AS 15.56.050  
Voter Misconduct 2  
4 Caden Cody Vaught - 006  
5  
6 Count IX - AS 15.56.050  
Voter Misconduct 2  
Gabrielle Ruth LeDoux - 003, Lisa Mylinda Simpson - 005  
7  
8 Count X - AS 15.56.050  
Voter Misconduct 2  
9 Caden Cody Vaught - 007  
10  
11 Count XI - AS 15.56.050  
Voter Misconduct 2  
12 Caden Cody Vaught - 008  
13  
14 Count XII - AS 15.56.035  
Unlawful Interference W/ Voting 2  
Gabrielle Ruth LeDoux - 004  
15  
16 Count XIII - AS 15.56.035  
Unlawful Interference W/ Voting 2  
Gabrielle Ruth LeDoux - 005, Lisa Mylinda Simpson - 006  
17  
18 Count XIV - AS 15.56.035  
Unlawful Interference W/ Voting 2  
19 Gabrielle Ruth LeDoux - 006, Lisa Mylinda Simpson - 007  
20  
21 Count XV - AS 15.56.035  
Unlawful Interference W/ Voting 2  
22 Gabrielle Ruth LeDoux - 007  
23  
24 Count XVI - AS 15.56.035  
Unlawful Interference W/ Voting 2  
25 Gabrielle Ruth LeDoux - 008  
26  
27 Count XVII - AS 15.56.035  
Unlawful Interference W/ Voting 2  
Gabrielle Ruth LeDoux - 009

Count XVIII - AS 15.56.035  
Unlawful Interference W/ Voting 2  
Gabrielle Ruth LeDoux - 010

THE OFFICE OF SPECIAL PROSECUTION CHARGES:

COUNT VI

That in the Third Judicial District, State of Alaska, on or about July 18, 2018, at or near Anchorage, Alaska, GABRIELLE R. LEDOUX and LISA M. SIMPSON, while acting as principals or accomplices, registered to vote without being entitled to register under AS 15.07.030.

All of which is a Class A Misdemeanor offense being contrary to and in violation of AS 15.56.050(a)(1) and against the peace and dignity of the State of Alaska.

COUNT VII

That in the Third Judicial District, State of Alaska, on or about June 17, 2018, at or near Anchorage, Alaska, CADEN C. VAUGHT registered to vote without being entitled to register under AS 15.07.030.

All of which is a Class A Misdemeanor offense being contrary to and in violation of AS 15.56.050(a)(1) and against the peace and dignity of the State of Alaska.

COUNT VIII

That in the Third Judicial District, State of Alaska, on or about September 28, 2018, at or near Anchorage, Alaska, CADEN C. VAUGHT registered to vote without being entitled to register under AS 15.07.030.

All of which is a Class A Misdemeanor offense being contrary to and in violation of AS 15.56.050(a)(1) and against the peace and dignity of the State of Alaska.

COUNT IX

That in the Third Judicial District, State of Alaska, on or about July 18, 2018, at or near Anchorage, Alaska, GABRIELLE R. LEDOUX and LISA M. SIMPSON, while acting as principals or accomplices, knowingly made a material false statement while applying for voter registration or reregistration.

All of which is a Class A Misdemeanor offense being contrary to and in violation of AS 15.56.050(a)(2) and against the peace and dignity of the State of Alaska.

COUNT X

That in the Third Judicial District, State of Alaska, on or about June 17, 2018, at or near Anchorage, Alaska, CADEN C. VAUGHT knowingly made a material false statement while applying for voter registration or reregistration.

All of which is a Class A Misdemeanor offense being contrary to and in violation of AS 15.56.050(a)(2) and against the peace and dignity of the State of Alaska.

COUNT XI

That in the Third Judicial District, State of Alaska, on or about September 28, 2018, at or near Anchorage, Alaska, CADEN C. VAUGHT knowingly made a material false statement while applying for voter registration or reregistration.

All of which is a Class A Misdemeanor offense being contrary to and in violation of AS 15.56.050(a)(2) and against the peace and dignity of the State of Alaska.

COUNT XII

That in the Third Judicial District, State of Alaska, on or about July 18, 2018, at or near Anchorage, Alaska, GABRIELLE R. LEDOUX knowingly solicited or encouraged, directly or indirectly, a registered voter who is no longer qualified to vote under AS 15.05.010, to vote in an election, to wit: LISA SIMPSON.

1 All of which is a Class A Misdemeanor offense being contrary to and in  
2 violation of AS 15.56.035 and against the peace and dignity of the State of Alaska.

3  
4 COUNT XIII

5 That in the Third Judicial District, State of Alaska, on or about August 19, 2018,  
6 at or near Anchorage, Alaska, GABRIELLE R. LEDOUX and LISA M. SIMPSON,  
7 while acting as principals or accomplices, knowingly solicited or encouraged, directly or  
8 indirectly, a registered voter who is no longer qualified to vote under AS 15.05.010, to  
9 vote in an election, to wit CADEN C. VAUGHT in the 2018 primary election.

10 All of which is a Class A Misdemeanor offense being contrary to and in  
11 violation of AS 15.56.035 and against the peace and dignity of the State of Alaska.

12 COUNT XIV

13 That in the Third Judicial District, State of Alaska, on or about September 25,  
14 2018, at or near Anchorage, Alaska, GABRIELLE R. LEDOUX and LISA M.  
15 SIMPSON, while acting as principals or accomplices, knowingly solicited or  
16 encouraged, directly or indirectly, a registered voter who is no longer qualified to vote  
17 under AS 15.05.010, to vote in an election, to wit CADEN C. VAUGHT in the 2018  
18 general election.

19 All of which is a Class A Misdemeanor offense being contrary to and in  
20 violation of AS 15.56.035 and against the peace and dignity of the State of Alaska.

21 COUNT XV

22 That in the Third Judicial District, State of Alaska, on or about July 18, 2018, at  
23 or near Anchorage, Alaska, GABRIELLE R. LEDOUX knowingly solicited or  
24 encouraged, directly or indirectly, a registered voter who is no longer qualified to vote  
25 under AS 15.05.010, to vote in an election, to wit Patrick Simpson in the 2018 primary  
26 election.

1 All of which is a Class A Misdemeanor offense being contrary to and in  
2 violation of AS 15.56.035 and against the peace and dignity of the State of Alaska.

3  
4 **COUNT XVI**

5 That in the Third Judicial District, State of Alaska, on or about September 25,  
6 2018, at or near Anchorage, Alaska, GABRIELLE R. LEDOUX knowingly solicited or  
7 encouraged, directly or indirectly, a registered voter who is no longer qualified to vote  
8 under AS 15.05.010, to vote in an election, to wit Patrick Simpson in the 2018 general  
9 election.

10 All of which is a Class A Misdemeanor offense being contrary to and in violation  
11 of AS 15.56.035 and against the peace and dignity of the State of Alaska.

12 **COUNT XVII**

13 That in the Third Judicial District, State of Alaska, on or about November 3,  
14 2014, at or near Anchorage, Alaska, GABRIELLE R. LEDOUX knowingly solicited or  
15 encouraged, directly or indirectly, a registered voter who is no longer qualified to vote  
16 under AS 15.05.010, to vote in an election, to wit: Dot Helgason in the 2014 general  
17 election.

18 All of which is a Class A Misdemeanor offense being contrary to and in violation  
19 of AS 15.56.035 and against the peace and dignity of the State of Alaska.

20 **COUNT XVIII**


21 That in the Third Judicial District, State of Alaska, on or about October 21,  
22 2014, at or near Anchorage, Alaska, GABRIELLE R. LEDOUX knowingly solicited or  
23 encouraged, directly or indirectly, a registered voter who is no longer qualified to vote  
24 under AS 15.05.010, to vote in an election, to wit: Bonnie Bailey in the 2014 general  
25 election.

1 All of which is a Class A Misdemeanor offense being contrary to and in  
2 violation of AS 15.56.035 and against the peace and dignity of the State of Alaska.  
3

4 Dated at Anchorage, Alaska, this 2nd day of June, 2021.  
5

6 TREG R. TAYLOR  
7 ATTORNEY GENERAL  
8

9 By:

  
Jenna L. Gruenstein  
Assistant Attorney General  
Alaska Bar No. 0912086

IN THE DISTRICT COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT GLENNALLEN

STATE OF ALASKA,

Plaintiff,

vs.

TERRY ANTHONY BELL

DOB: [REDACTED]

APSIN ID: [REDACTED]

DMV NO.: [REDACTED]

ATN: [REDACTED]

Defendant.

No. (Terry Anthony Bell)

INFORMATION

I certify this document and its attachments do not contain the (1) name of a victim of a sexual offense listed in AS 12.61.140 or (2) residence or business address or telephone number of a victim of or witness to any offense unless it is an address identifying the place of a crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court. The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990: NONE

Count I - AS 15.56.040(a)(1) and/or (3)

Voter Misconduct 1

Terry Anthony Bell - 001

Count II - AS 15.56.040(a)(1) and/or (3)

Voter Misconduct 1

Terry Anthony Bell - 002

Count III - AS 15.56.040(a)(1) and/or (3)

Voter Misconduct 1

Terry Anthony Bell - 003

Count IV - AS 15.56.040(a)(1) and/or (3)

Voter Misconduct 1

Terry Anthony Bell - 004

Count V - AS 15.56.040(a)(1) and/or (3)

Voter Misconduct 1

1 Terry Anthony Bell - 005

2 Count VI - AS 15.56.040(a)(1) and/or (3)

3 Voter Misconduct 1

4 Terry Anthony Bell - 007

5 Count VII - AS 15.56.040(a)(1) and/or (3)

6 Voter Misconduct 1

7 Terry Anthony Bell - 008

8 Count VIII - AS 15.56.040(a)(1) and/or (3)

9 Voter Misconduct 1

10 Terry Anthony Bell - 009

11 Count IX - AS 15.56.040(a)(1) and/or (3)

12 Voter Misconduct 1

13 Terry Anthony Bell - 010

14 Count X - AS 15.56.040(a)(1) and/or (3)

15 Voter Misconduct 1

16 Terry Anthony Bell - 011

17 Count XI - AS 15.56.040(a)(1) and/or (3)

18 Voter Misconduct 1

19 Terry Anthony Bell - 012

20 Count XII - AS 15.56.040(a)(1) and/or (3)

21 Voter Misconduct 1

22 Terry Anthony Bell - 014

23 Count XIII - AS 15.56.040(a)(1) and/or (3)

24 Voter Misconduct 1

25 Terry Anthony Bell - 015

26 THE DISTRICT ATTORNEY CHARGES:

27 COUNT I

That in the Third Judicial District, State of Alaska, on or about September 21, 2016, at or near Copper Center, Alaska, TERRY ANTHONY BELL intentionally made a false affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to

1 wit: falsely filled out a ballot envelope in the name of "Teresa A. Bell," witnessed by  
2 "Teralyn M. Rose."

3 All of which is a Class C Felony offense being contrary to and in violation of AS  
4 15.56.040(a)(1) and/or (3) and against the peace and dignity of the State of Alaska.

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
COUNT II

That in the Third Judicial District, State of Alaska, on or about October 15,  
2016, at or near Copper Center, Alaska, TERRY ANTHONY BELL intentionally made a  
false affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to  
wit: falsely filled out a ballot envelope in the name of "Teresa A. Bell," and witnessed  
by "Sissy Fagget Terry."

All of which is a Class C Felony offense being contrary to and in violation of AS  
15.56.040(a)(1) and/or (3) and against the peace and dignity of the State of Alaska.

COUNT III

That in the Third Judicial District, State of Alaska, on or about September 15,  
2017, at or near Copper Center, Alaska, TERRY ANTHONY BELL intentionally made a  
false affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to  
wit: falsely filled out a ballot envelope in the name of "Miss Teresa A. Bell" and  
witnessed by "Fagget Terry."

All of which is a Class C Felony offense being contrary to and in violation of AS  
15.56.040(a)(1) and/or (3) and against the peace and dignity of the State of Alaska.

COUNT IV

That in the Third Judicial District, State of Alaska, on or about October 15,  
2017, at or near Copper Center, Alaska, TERRY ANTHONY BELL intentionally made a  
false affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to  
wit: falsely filled out a voter registration application in the name of "Fagget Terry."

1 All of which is a Class C Felony offense being contrary to and in violation of AS  
2 15.56.040(a)(1) and/or (3) and against the peace and dignity of the State of Alaska.

3  
4 COUNT V

5 That in the Third Judicial District, State of Alaska, on or about May 10, 2018, at  
6 or near Copper Center, Alaska, TERRY ANTHONY BELL intentionally made a false  
7 affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to wit:  
8 falsely filled out a voter registration application in the name of "Fagget Terry."

9 All of which is a Class C Felony offense being contrary to and in violation of AS  
10 15.56.040(a)(1) and/or (3) and against the peace and dignity of the State of Alaska.

11 COUNT VI

12 That in the Third Judicial District, State of Alaska, on or about July 30, 2018, at  
13 or near Copper Center, Alaska, TERRY ANTHONY BELL intentionally made a false  
14 affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to wit:  
15 falsely filled out a ballot envelope in the name of "Fagget A. Terry" and witnessed by  
16 "Teresa R. Bell."

17 All of which is a Class C Felony offense being contrary to and in violation of AS  
18 15.56.040(a)(1) and/or (3) and against the peace and dignity of the State of Alaska.

19 COUNT VII

20 That in the Third Judicial District, State of Alaska, on or about September 8,  
21 2018, at or near Copper Center, Alaska, TERRY ANTHONY BELL intentionally made a  
22 false affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to  
23 wit: falsely filled out a ballot envelope in the name of "Fagget Terry" and witnessed by  
24 "Teresa R. Bell."

25 All of which is a Class C Felony offense being contrary to and in violation of AS  
26 15.56.040(a)(1) and/or (3) and against the peace and dignity of the State of Alaska.

COUNT VIII

That in the Third Judicial District, State of Alaska, on or about October 13, 2018, at or near Copper Center, Alaska, TERRY ANTHONY BELL intentionally made a false affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to wit: falsely filled out a ballot envelope in the name of "Fagget Terry" and witnessed by "Teresa R. Bell."

All of which is a Class C Felony offense being contrary to and in violation of AS 15.56.040(a)(1) and/or (3) and against the peace and dignity of the State of Alaska.

COUNT IX

That in the Third Judicial District, State of Alaska, on or about September 12, 2019, at or near Copper Center, Alaska, TERRY ANTHONY BELL intentionally made a false affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to wit: falsely filled out a ballot envelope in the name of "Fagget Terry" and witnessed by "Terry A. Bell."

All of which is a Class C Felony offense being contrary to and in violation of AS 15.56.040(a)(1) and/or (3) and against the peace and dignity of the State of Alaska.

COUNT X

That in the Third Judicial District, State of Alaska, on or about May 28, 2020, at or near Copper Center, Alaska, TERRY ANTHONY BELL intentionally made a false affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to wit: falsely filled out an absentee ballot application in the name of "Fagget Terry."

All of which is a Class C Felony offense being contrary to and in violation of AS 15.56.040(a)(1) and/or (3) and against the peace and dignity of the State of Alaska.

COUNT XI

That in the Third Judicial District, State of Alaska, on or about July 23, 2020, at or near Copper Center, Alaska, TERRY ANTHONY BELL intentionally made a false

1 affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to wit:  
2 falsely filled out a ballot envelope in the name of "Fagget Terry" and witnessed by  
3 "Teresa A. Bell."

4 All of which is a Class C Felony offense being contrary to and in violation of AS  
5 15.56.040(a)(1) and/or (3) and against the peace and dignity of the State of Alaska.

6 COUNT XII

7 That in the Third Judicial District, State of Alaska, on or about September 12,  
8 2020, at or near Copper Center, Alaska, TERRY ANTHONY BELL intentionally made a  
9 false affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to  
10 wit: falsely filled out a ballot envelope in the name of "Fagget Terry" and witnessed by  
11 "Teresa A. Bell."

12 All of which is a Class C Felony offense being contrary to and in violation of AS  
13 15.56.040(a)(1) and/or (3) and against the peace and dignity of the State of Alaska.

14 COUNT XIII

15 That in the Third Judicial District, State of Alaska, on or about October 14,  
16 2020, at or near Copper Center, Alaska, TERRY ANTHONY BELL intentionally made a  
17 false affidavit, swore falsely, or falsely affirmed under an oath required by Title 15, to  
18 wit: falsely filled out a ballot envelope in the name of "Fagget Terry" and witnessed by  
19 "Teresa R. Bell."

20 All of which is a Class C Felony offense being contrary to and in violation of AS  
21 15.56.040(a)(1) and/or (3) and against the peace and dignity of the State of Alaska.

22  
23 The undersigned swears under oath this Information is based upon a review of  
24 police report AK20073091 submitted to date.

25 On October 5, 2020, the State of Alaska Division of Elections ("DOE") reported  
26 a possible voter fraud incident to the Alaska State Troopers ("AST"). DOE reported that  
27 over a several year time period, it appeared that TERRY A. BELL had signed and

1 submitted voter applications and ballot envelopes under multiple names, as well as signed  
2 as a witness for his own ballots on several occasions using various aliases. AST Sgt.  
3 Nathan Bucknall investigated the matter and obtained multiple voter records from DOE  
4 linked to BELL. These records showed that BELL had first registered to vote under his  
5 legal name, "Terry A. Bell," and using his correct personal identifying information  
6 ("PII"), in 1980. Following his initial registration, BELL re-registered with the correct  
7 name several times.

8 Sgt. Bucknall's review of the documents showed that in 2000, BELL first  
9 submitted a voter registration under a different name, "Misty R. Rose," with BELL's  
10 correct PII listed on the application. Between 2000 and 2014, 27 voter documents were  
11 filed that appeared to be associated with BELL, to include voter registration applications,  
12 absentee ballot applications and a questioned ballot. These documents were submitted  
13 under the names Misty R. Rose, Misty A. Rose, Tairalyn Misty Rose, Tairalyn M. Rose,  
14 Tairalyn A. Rose, Miss Terry A. Bell, Teri Anna Bell, Terry Anna Bell, Teresa A. Bell,  
15 and Teresa Anna Bell. On five voter documents submitted during this time—once in  
16 2003, three times in 2004, and once in 2014—BELL submitted election documents with  
17 his correct name listed on the documents. In Alaska, voter registration applications,  
18 absentee ballot applications, ballot envelopes, and questioned ballots each include a  
19 perjury warning above the signature block, as well as a warning that if a person provides  
20 false information on the documents s/he can be convicted of a crime.

21 DOE provided several documents they had received between 2016 and 2020 that  
22 appeared to be linked to BELL. These included ten ballot envelopes, wherein a voter fills  
23 out his or her name and identifying information and signs the envelope in which the  
24 voter's absentee ballot is placed. The ballot envelope indicates that the voter's signature  
25 must be witnessed, and provides a place for the witness to sign as well. Each of the ballot  
26 envelopes included language above the voter signature certifying that **"I certify, under  
27 penalty of perjury, that the foregoing is true and accurate."** Each ballot envelope  
also included language saying: **"Warning:** False statements made by the voter or by the  
attesting witness on the certificate are punishable by law."

1 The ten ballot envelopes provided by DOE included the following information.  
2 First, a ballot envelope with a signature dated September 21, 2016, signed by "Teresa A.  
3 Bell" and witnessed by "Teralyn M. Rose." Second, a ballot envelope with a signature  
4 date of October 15, 2016, signed by "Teresa A. Bell" and witnessed by "Sissy Fagget  
5 Terry." Third, a ballot envelope with a signature date of September 15, 2017, signed by  
6 "Miss Teresa A. Bell" and witnessed by "Fagget Terry." Fourth, a ballot envelope with a  
7 signature date of July 30, 2018, signed by "Fagget A. Terry" and witnessed by "Teresa R.  
8 Bell." Fifth, a ballot envelope with a signature date of September 8, 2018, signed by  
9 "Fagget Terry" and witnessed by "Teresa R. Bell." Sixth, a ballot envelope with a  
10 signature date of October 13, 2018, signed by "Fagget Terry" and witnessed by "Teresa  
11 R. Bell." Seventh, a ballot envelope with a signature date of September 12, 2019, signed  
12 by "Fagget Terry" and witnessed by "Terry A. Bell." Eighth, a ballot envelope with a  
13 signature date of July 23, 2020, signed by "Fagget Terry" and witnessed by "Teresa A.  
14 Bell." Ninth, a ballot envelope with a signature date of September 12, 2020, signed by  
15 "Fagget Terry" and witnessed by "Teresa A. Bell." Tenth, a ballot envelope with a  
16 signature date of October 14, 2020, signed by "Fagget Terry" and witnessed by "Teresa  
17 R. Bell." Each of the ten ballot envelopes required the voter to provide a voter identifier;  
18 on each of the envelopes, the voter number provided was [REDACTED]. BELL's voter  
19 number, which has been assigned to him since 1980, is [REDACTED].

20 In addition to the ballot envelopes, Sgt. Bucknall found three instances where  
21 BELL submitted either a voter registration application or an absentee ballot application  
22 under a false name. DOE provided a voter registration application, signed by "Fagget A.  
23 Terry" and dated October 15, 2017. DOE also provided a voter registration application,  
24 again signed by "Fagget Terry" and dated May 10, 2018. DOE provided a signed  
25 absentee ballot application, signed by "Fagget Terry" and dated May 28, 2020. Both the  
26 absentee ballot and voter registration application forms include language notifying an  
27 applicant that they are signing under penalty of perjury and could be charged with a  
crime for providing false information.

1 The handwriting and signatures on all of the ballot envelopes, voter registration  
2 applications and absentee ballot applications appeared noticeably similar.

3 AST Sgt. Nathan Bucknall interviewed BELL on November 19, 2020. BELL  
4 stated that his legal name is TERRY BELL. He initially said that he did not fill out his  
5 2020 ballot under the name "Fagget Terry" and that his cousin, Fred Grant, must have  
6 done it. BELL stated that Grant visits BELL and that he mailed BELL's 2020 ballot.  
7 Upon questioning, BELL stated that someone may have taken his ballot out of the mail  
8 and filled out a different ballot and submitted that ballot.

9 After additional questioning, BELL admitted writing the incorrect name on his  
10 election documents as a protest or a joke. BELL stated he used the name "Fagget"  
11 because it is something he does not like, along with the election system. When he was  
12 shown the Division of Elections documents Sgt. Bucknall collected, as described above,  
13 BELL admitted that he had signed the ballots and voter applications in question. BELL  
14 stated that he changed his name on his voter documents because the previous Governor  
15 took money from the Permanent Fund Dividend. However, BELL first used an incorrect  
16 name on an elections document in 2000. BELL acknowledged that he knew what he was  
17 doing was wrong. During the time period that he wrote the incorrect names on his  
18 elections documents, BELL used his correct name for multiple DMV and PFD forms—  
19 and never used an incorrect name.

20 BELL was also asked about the witness signature on his 2020 general election  
21 ballot (dated October 14, 2020). He stated that it was signed by "Teresa Bell," who is his  
22 sister in law. When Sgt. Bucknall noted that the signature for "Teresa Bell" looked the  
23 same as previous signatures signed on BELL's voter documents, BELL acknowledged  
24 that he signed his 2020 general election ballot with the name "Fagget Terry" and also  
25 signed the witness portion himself with the name "Teresa Bell." BELL stated that he  
26 does not have a vehicle and lives far away from people and never sees his neighbors.  
27

BAIL INFORMATION

Per the Alaska Public Safety Information Network, the defendant has the following convictions in Alaska:

CONV COURT	CONV DATE	CONVICTING CHARGE	COURT DOCKET	POS ID	FEL
DAN	08/05/98	SHOPLIFTING	97-9798	Y	N
DAN	12/05/97	SHOPLIFTING	97-9657	Y	N
DAN	08/05/98	FAILURE TO APPEAR	97-9798	Y	N
DPE	04/11/97	INDECENT EXPOSURE	1PE-97-0044	Y	N
DPE	12/08/95	CRIM TRESPASS 1- IN A DWELLING	1PE-95-263	Y	N
DPE	01/23/92	CRIMINAL TRESPASS	92-23	Y	N
MPE	08/15/86	DAMAGE PROPERTY	86-166	N	N

Dated at Anchorage, Alaska, this 7th day of July, 2021.

TREG R. TAYLOR  
ATTORNEY GENERAL

By: Jenna Gruenstein  
Jenna L. Gruenstein  
Chief Assistant Attorney General  
Alaska Bar No. 0912086

IN THE DISTRICT COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT GLENNALLEN

STATE OF ALASKA,

Plaintiff,

vs.

TERRY ANTHONY BELL

Defendant

DOB: 10/15/1960 DLN: 6015614 ST AK

APSIN: 6015614 ATN: 111496617

Address: MI 93.3 Richardson  
Highway  
Copper Center, AK 99573-  
9603

CASE NO.

**SUMMONS**

To: Above Named Defendant

You are summoned to appear before the ☐ District ☐ Superior Court at:

Court Address: , ,

Courtroom: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

☐

You may participate by telephone. In order to participate by telephone:

☐

You must call **1-800-768-2983** at the scheduled hearing time. When prompted, enter access code: \_\_\_\_\_. You will be placed on hold until the "chairperson" joins the call. Stay on the line – your case may be delayed by other cases.

☐

File a written request prior to the date of the hearing. You may use form TF-710 which is available at: <https://public.courts.alaska.gov/web/forms/docs/tf-710.pdf>

☐

to answer to:

☐

the attached charging document.

☐

a notice of reinstatement of prosecution.

☐

If you fail to appear, a warrant will be issued for your arrest.

Effective Date \_\_\_\_\_

Judge/Deputy Clerk as ordered on record by \_\_\_\_\_

(SEAL) \_\_\_\_\_

Type or Print Judge's Name \_\_\_\_\_

Agency Issued to: \_\_\_\_\_

Agency Location: \_\_\_\_\_

**RETURN**

**Original summons must be returned to issuing court listed at the top of this form.**

I received this summons (date) \_\_\_\_\_, and served it on (date) \_\_\_\_\_, at (address): \_\_\_\_\_ in (city) \_\_\_\_\_, AK, by delivering a copy of it and a copy of the charging document to \_\_\_\_\_, the defendant or a person of suitable age and discretion residing at the defendant's home or usual place of residence.

Return Date \_\_\_\_\_

Signature of Peace Officer \_\_\_\_\_

Type or Print Name \_\_\_\_\_

Badge No. \_\_\_\_\_