

2. On or about July 15, 2019, the defendant filed a campaign finance report that omitted the \$46,500 in personal expenditures, omitted \$4,000 in campaign contributions, and included a \$3,000 loan repayment that the defendant did not make.
3. On February 26, 2020, the day before initiating divorce proceedings, the defendant moved \$20,000 from his personal (individual) savings account into his campaign account. A few months later, the defendant transferred \$20,000 from his campaign account back to his individual savings account. The defendant omitted both transactions from his campaign finance reports.
4. Beginning on or about November 8, 2018, and continuing until the filing of this motion, the defendant knowingly or recklessly misrepresented his qualifications by stating that he is a Certified Financial Planner (CFP).
5. Beginning on or about April 3, 2021, and continuing through on or about October 1, 2021, the defendant misused government property by using county funds to pay Taral Patel, a campaign consultant, and/or Sadia Khan, a social media consultant, for services rendered to the defendant's political campaign. The payments were disbursed pursuant to an Agreement for Professional Consulting Services between the Office of the County Judge and a law firm.
6. Beginning on or about April 3, 2021, and continuing through on or about April 1, 2022, the defendant conspired with Taral Patel to violate the Hatch Act. Patel, while employed with the federal government, contemporaneously worked on defendant's political campaign and for the Office of the County Judge. Patel was paid by the County pursuant to an Agreement for the Professional Consulting Services between the Office of the County Judge and a law firm.
7. Beginning on or about April 3, 2021, and continuing through on or about November 6, 2022, the defendant conspired with Taral Patel to misuse government property, namely Fort Bend County property, personnel, and services that came into the defendant's possession by virtue of his office by using them for political advertising, namely the defendant's re-election campaign. The government property included, but was not limited to, employees, interns, money, information, and graphics created for official purposes.
8. On or about November 17, 2021, the defendant requested to pay Hina Qadri for services rendered to the defendant's political campaign through an Agreement for Professional Services between the Office of the County Judge and a law firm.
9. Beginning on or about April 15, 2022, and continuing through on or about October 1, 2022, the defendant misused government property by using county funds to pay Taral Patel for services rendered to the defendant's political campaign through an Agreement for Professional Services between the Office of the County Judge and DMK & Co. LLC.

10. Beginning on or about April 26, 2022 and continuing through November 28, 2022, the defendant conspired with Taral Patel, his friend and campaign consultant, to disseminate disinformation that benefitted defendant's political campaign or harmed his political opponent's using the alias PaulRosenstein73@gmail.com.
11. Beginning on or about September 18, 2022, and continuing until November 8, 2022, the defendant solicited, encouraged, or directed his campaign consultant, Taral Patel, to post comments on social media that appeared to attack the defendant. Patel posted racist comments using several aliases including "Richard Melton," "Tim Harrison," and "Antonio Scalywag" and the defendant referenced the comments in a series of campaign communications online and in interviews to accuse his political opponent of being responsible for them.
12. On or about September 21, 2022, the defendant encouraged or directed members of his staff to intentionally conceal, remove, or otherwise impair the legibility or availability of a governmental record, namely Facebook posts by user "Alena Heede" that were posted to the official county government Facebook page.
13. On or about September 24, 2022, the defendant and Taral Patel falsified and disseminated a polling memo that misrepresented the defendant's lead over his political opponent. The defendant referenced the memo in campaign communications and used it to mislead voters and to motivate donors to give money to his campaign.
14. On or about July 22, 2023, the defendant offered, or intended to offer his recommendation on the selection of an architect for a county project from a list of donors who contributed to his political campaign.

The State will introduce all acts alleged in indictments currently pending in Fort Bend County.

RESPECTFULLY SUBMITTED,



Charann Thompson
Assistant District Attorney
Fort Bend County, Texas

CERTIFICATE OF SERVICE

I, the undersigned Assistant District Attorney, hereby certify that a true and correct copy of the foregoing notice was e-served via EFS to the attorney for the Defendant on August 21, 2025.

A handwritten signature in cursive script that reads "Charann Thompson".

Charann Thompson
Assistant District Attorney
Fort Bend County, Texas

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Katherine Peterson
Bar No. 24090328
katherine.peterson@fortbendcountytexas.gov
Envelope ID: 104687120
Filing Code Description: Request
Filing Description: State's Request for Notice of Experts
Status as of 8/21/2025 3:34 PM CST

Associated Case Party: Texas Bail Bonds

Name	BarNumber	Email	TimestampSubmitted	Status
Terry Yates		tyates@yateslawoffices.com	8/21/2025 3:20:48 PM	SENT

Associated Case Party: KylePrasadGeorge

Name	BarNumber	Email	TimestampSubmitted	Status
Jared Woodfill		woodfillservice@gmail.com	8/21/2025 3:20:48 PM	SENT

Associated Case Party: State of Texas

Name	BarNumber	Email	TimestampSubmitted	Status
Charann Thompson		fbcds.eservice@fortbendcountytexas.gov	8/21/2025 3:20:48 PM	SENT