

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

STATE OF ALASKA,

Plaintiff,

vs.

GABRIELLE R LEDOUX

Defendant

[Redacted]

CASE NO. 3AN-20-2172 CR

SUMMONS

To: GABRIELLE R LEDOUX

OL/ID: [Redacted]

Home Phone:

Work phone:

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

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

[Redacted]

CASE NO. 3AN-20-2173 CR

SUMMONS

To: LISA M SIMPSON

Home Phone:

Work phone:

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

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

Judith 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.

CADEN C VAUGHT

Defendant

[Redacted]

CASE NO. 3AN-20-2174 CR

SUMMONS

To: CADEN C VAUGHT

[Redacted]

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

3 STATE OF ALASKA,

4 Plaintiff,

5 vs.

6
7 GABRIELLE R LEDOUX

8 [REDACTED]
9 [REDACTED]

10 LISA M SIMPSON

11 [REDACTED]
12 [REDACTED]
13 [REDACTED]

14 CADEN C VAUGHT

15 [REDACTED]
16 [REDACTED]
17 [REDACTED]

18 Defendants.

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

19 3AN-18-2715 SW; 3AN-18-2716 SW; 3AN-18-2717 SW; 3AN-18-2718 SW; 3AN-18-
20 2719 SW; 3AN-18-2720 SW; 3AN-18-2721 SW; 3AN-18-2722 SW; 3AN-18-2723 SW;
21 3AN-18-2724 SW; 3AN-18-2725 SW; 3AN-18-2726 SW; 3AN-18-2727 SW; 3AN-18-
22 2728 SW; 3AN-18-2729 SW; 3AN-18-2965 SW; 3AN-18-2966 SW; 3AN-18-2967 SW;
23 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

24 No. 3AN-20-2172 CR (Gabrielle R LeDoux)
25 No. 3AN-20-2173 CR (Lisa M Simpson)
26 No. 3AN-20-2174 CR (Caden C Vaught)

27 INFORMATION

Department of Law, Criminal Division
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Email: lawosp@alaska.gov

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1 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)
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
3 crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court.
4 The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990: NONE

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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

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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

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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 **COUNT II**

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

13 All of which is a Class C Felony offense being contrary to and in violation of AS
14 15.56.040 and against the peace and dignity of the State of Alaska.

15 **COUNT III**

16 That in the Third Judicial District, State of Alaska, on or about September 28,
17 2018, at or near Anchorage, Alaska, LISA M. SIMPSON and CADEN C. VAUGHT,
18 while acting as principals or accomplices, intentionally made a false affidavit, swore
19 falsely, or falsely affirmed under an oath required by Title 15, to wit: falsely filled out
20 Vaught's voter registration application.

21 All of which is a Class C Felony offense being contrary to and in violation of AS
22 15.56.040 and against the peace and dignity of the State of Alaska.

23 **COUNT IV**

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

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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
24 COUNT VIII

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

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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
24 COUNT XII

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

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

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

COUNT XVI

That in the Third Judicial District, State of Alaska, on or about September 25, 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 Patrick Simpson in the 2018 general election.

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

COUNT XVII

That in the Third Judicial District, State of Alaska, on or about November 3, 2014, 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: Dot Helgason in the 2014 general election.

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

COUNT XVIII

That in the Third Judicial District, State of Alaska, on or about October 21, 2014, 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: Bonnie Bailey in the 2014 general election.

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

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

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

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

Investigators determined that Simpson registered to vote in House District 15 on 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

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

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

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

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

.....

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

.....

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

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

25 **Voter Certificate: Read and Sign:** I certify, under penalty of perjury, that
26 the above information I provided on this document is true and correct. I am
27 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.

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

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

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

17 Simpson submitted a voter registration application she signed on July 18, 2018. In
18 her application, she listed her address of residence as a particular unit of a triplex located
19 on Boston Street, which is in House District 15. Simpson signed the form below the oath
20 acknowledging that she was swearing to its contents under penalty of perjury. LeDoux
21 signed the registration form as the registrar.¹ Simpson voted in person at a House District
22 15 precinct in both the primary and general election cycles. Simpson could only lawfully
23 vote in House District 15 using the Boston Street address if she had legally established
24 that location as her residence within at least thirty days of the election.

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

¹ 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.

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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

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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."² 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 ² 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.

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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.

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

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

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

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

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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

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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:

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

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

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

³ The area commonly known as “midtown” falls outside of the boundaries of House District 15.
⁴ 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.”

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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
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