

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.

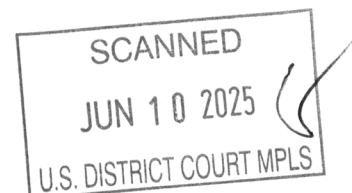
UNITED STATES OF AMERICA,)	
)	<i>CR 25-228 KMM</i>
Plaintiff,)	INFORMATION
v.)	
)	18 U.S.C. § 371
RONNIE WILLIAMS (a/k/a)	52 U.S.C. § 20511(2)(A)
“MICHAEL GIBSON”),)	
)	
Defendant.)	

THE UNITED STATES CHARGES THAT:

INTRODUCTION

At all times material to this Information:

1. Foundation 1 was an entity seeking to register voters in the State of Minnesota.
2. Defendant RONNIE WILLIAMS (a/k/a “MICHAEL GIBSON”) worked as a paid contractor assisting Foundation 1 with this voter registration campaign.
3. Individual 1 was the defendant’s long-time romantic partner.



COUNT ONE
(Conspiracy)

THE CONSPIRACY TO ENGAGE IN VOTER REGISTRATION FRAUD

4. Beginning in or about 2021 and continuing until in or about 2022, in the District of Minnesota and elsewhere, the defendant,

RONNIE WILLIAMS (a/k/a “MICHAEL GIBSON”),

and Individual 1 did knowingly and willfully combine, conspire, and agree together and with each other to knowingly and willfully deprive, defraud, and attempt to deprive and defraud the residents of the State of Minnesota of a fair and impartially conducted election process, in an election for federal office, by procuring and submitting voter registration applications that they knew to be materially false, fictitious, and fraudulent under Minnesota law to various county election offices in the State of Minnesota, all in violation of Title 52, United States Code, Section 20511(2)(A).

MANNER AND MEANS OF THE CONSPIRACY

5. It was part of the conspiracy that
- a. WILLIAMS and Individual 1 would generate fictitious names, addresses, dates of birth, telephone numbers, and social security numbers.
 - b. WILLIAMS and Individual 1 would then fill out voter registration applications with this false information.

c. WILLIAMS or Individual 1 would then sign a form certifying that they “have read and understand this statement” and “that giving false information is a felony punishable by not more than 5 years imprisonment or a fine of not more than \$10,000, or both.”

d. WILLIAMS would then provide the completed forms to Foundation 1, through its agents.

e. Foundation 1, through its agents, would submit these false voter registration applications to county election offices across the State of Minnesota.

f. Foundation 1 would in turn pay WILLIAMS.

g. WILLIAMS would then split the proceeds with Individual 1.

OVERT ACTS

6. To effect the object of the conspiracy, WILLIAMS and Individual 1 committed and caused to be committed the following overt acts, among others, in the District of Minnesota and elsewhere:

a. On or about September 30, 2022, Individual 1 completed a false voter registration application in the name of “Brad Montly.”

b. On or about November 1, 2022, WILLIAMS completed a false voter registration application in the name of “Harry Jhonson.”

7. All in violation of Title 18, United States Code, Section 371.

Dated: June 10, 2025

JOSEPH H. THOMPSON
Acting United States Attorney
District of Minnesota

By: /s/ Harry Jacobs
Harry Jacobs
Assistant United States Attorney
300 South Fourth St., Suite 600
Minneapolis, MN 55415
Tel: 612-664-5787
Email: Harry.Jacobs@usdoj.gov

EDWARD P. SULLIVAN
Acting Chief, Public Integrity Section
U.S. Department of Justice

By: /s/ Jonathan E. Jacobson
Jonathan E. Jacobson
Trial Attorney
Public Integrity Section
1301 New York Ave. NW, 10th Fl.
Washington, DC 20005
Tel: 202-514-1412
Email: jonathan.Jacobson@usdoj.gov

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.

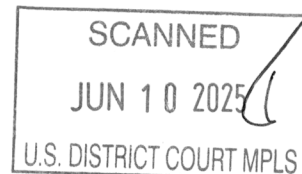
UNITED STATES OF AMERICA,)	
)	CR 25-227 LMP
Plaintiff,)	INFORMATION
v.)	
)	18 U.S.C. § 371
LORRAINE LEE COMBS,)	52 U.S.C. § 20511(2)(A)
)	
Defendant.)	
)	

THE UNITED STATES CHARGES THAT:

INTRODUCTION

At all times material to this Information:

1. Foundation 1 was an entity seeking to register voters in the State of Minnesota.
2. Individual 1 worked as a paid contractor assisting Foundation 1 with this voter registration campaign.
3. Individual 1 was the long-time romantic partner of the defendant, LORRAINE COMBS.



COUNT ONE
(Conspiracy)

THE CONSPIRACY TO ENGAGE IN VOTER REGISTRATION FRAUD

4. Beginning in or about 2021 and continuing until in or about 2022, in the District of Minnesota and elsewhere, the defendant,

LORRAINE COMBS,

and Individual 1 did knowingly and willfully combine, conspire, and agree together and with each other to knowingly and willfully deprive, defraud, and attempt to deprive and defraud the residents of the State of Minnesota of a fair and impartially conducted election process, in an election for federal office, by procuring and submitting voter registration applications that they knew to be materially false, fictitious, and fraudulent under Minnesota law to various county election offices in the State of Minnesota, all in violation of Title 52, United States Code, Section 20511(2)(A).

MANNER AND MEANS OF THE CONSPIRACY

5. It was part of the conspiracy that
- a. COMBS and Individual 1 would generate fictitious names, addresses, dates of birth, telephone numbers, and social security numbers.
 - b. COMBS and Individual 1 would then fill out voter registration applications with this false information.

c. COMBS or Individual 1 would then sign a form certifying that they “have read and understand this statement” and “that giving false information is a felony punishable by not more than 5 years imprisonment or a fine of not more than \$10,000, or both.”

d. Individual 1 would then provide the completed forms to Foundation 1, through its agents.

e. Foundation 1, through its agents, would submit these false voter registration applications to county election offices across the State of Minnesota.

f. Foundation 1 would in turn pay Individual 1.

g. Individual 1 would then split the proceeds with COMBS.

OVERT ACTS

6. To effect the object of the conspiracy, COMBS and Individual 1 committed and caused to be committed the following overt acts, among others, in the District of Minnesota and elsewhere:

a. On or about September 30, 2022, COMBS completed a false voter registration application in the name of “Brad Montly.”

b. On or about November 1, 2022, Individual 1 completed a false voter registration application in the name of “Harry Jhonson.”

7. All in violation of Title 18, United States Code, Section 371.

Dated: June 10, 2025

JOSEPH H. THOMPSON
Acting United States Attorney
District of Minnesota

By: /s/ Harry Jacobs
Harry Jacobs
Assistant United States Attorney
300 South Fourth St., Suite 600
Minneapolis, MN 55415
Tel: 612-664-5787
Email: Harry.Jacobs@usdoj.gov

EDWARD P. SULLIVAN
Acting Chief, Public Integrity Section
U.S. Department of Justice

By: /s/ Jonathan E. Jacobson
Jonathan E. Jacobson
Trial Attorney
Public Integrity Section
1301 New York Ave. NW, 10th Fl.
Washington, DC 20005
Tel: 202-514-1412
Email: jonathan.Jacobson@usdoj.gov

Search



About the Office

NEWS ROOM

Secretary Simon Statement on Charges Related to Fraudulent Voter Registration Applications

June 13, 2025

No fraudulent ballots were requested or cast in connection with the case

SAINT PAUL – The U.S. Attorney for the District of Minnesota has charged two people with conspiracy to engage in voter registration fraud.

For more than two years, Office of the Minnesota Secretary of State and local election officials have partnered with the FBI on this investigation. Local election officials used the verification tools built into the Minnesota voter registration system and identified inconsistencies on voter registration forms. Local election officials then immediately reported the inconsistencies to law enforcement and our office.

The Office of the Minnesota Secretary of State coordinated with every county election office to ensure that all fraudulent registration attempts would be detected and confirm that no ballots were requested or cast.

Minnesota Secretary of State Steve Simon made the following statement:

“Minnesota’s elections are free, fair, and secure – and these charges reinforce that fact. These charges prove that our systems work. The extensive checks in Minnesota’s voter registration process ensured that the fraudulent applications were immediately flagged, and no ineligible votes were cast.

Our office is deeply grateful for the dedicated election officials across the state and all of our federal partners who protected the integrity of our voter registration system.

Our message to would-be fraudsters is clear: If you try to trick or scheme your way into registering voters in Minnesota, you will be caught and prosecuted.”

[**← RETURN TO LIST**](#)

}



PRESS RELEASE

Two Nevada Residents Charged for Conspiring to Engage in Voter Registration Fraud in Minnesota

Friday, June 13, 2025

For Immediate Release

U.S. Attorney's Office, District of
Minnesota

Minneapolis, Minn. – Two Nevada residents, formally of Minnesota, were charged by Information with Conspiracy to Engage in Voter Registration Fraud, announced Acting U.S. Attorney Joseph H. Thompson.

“Election fraud strikes at the heart of our democracy,” said Acting U.S. Attorney Joseph H. Thompson. “Thankfully, the FBI stopped this fraud in its tracks, before anyone successfully cast a fraudulent ballot. But we will stay vigilant. Whether its jury bribery, witness tampering, or now election fraud – crimes that threaten our democracy have no place in Minnesota.”

“Nothing is more central to our democracy than fair and impartially conducted elections,” said Special Agent in Charge Alvin M. Winston Sr. of FBI Minneapolis. “Through their actions, Combs and Williams attempted to deprive the citizens of Minnesota of a secure and reliable election process. Along with our partners, the FBI will stop at nothing to identify and bring to justice anyone who threatens the security of our electoral system.”

According to court documents, beginning in 2021 and continuing through 2022, Ronnie Williams and Lorraine Lee Combs participated in a conspiracy to generate fictitious names and information that they used to fill out Minnesota voter registration applications. Williams and

Combs then signed a form certifying that they “have read and understand this statements” and “that giving false information is a felony punishable by not more than 5 years imprisonment or a fine of not more than \$10,000, or both.”

According to court documents, Williams then provided the completed voter registration forms to Foundation 1, an entity seeking to register voters in Minnesota, which submitted the false voter registration applications to county election offices across Minnesota. Foundation 1 paid Williams for the registrations, and Williams split the proceeds with Combs.

Williams is scheduled to appear for an arraignment and change of plea hearing before U.S. District Court Judge Laura M. Provinzino on July 8, 2025.

This case is the result of an investigation conducted by the Federal Bureau of Investigation. The U.S. Attorney’s Office wishes to thank the Justice Department’s Public Integrity Section for partnering with the U.S. Attorney’s Office on this case. The U.S. Attorney’s Office also wishes to thank the Office of the Minnesota Secretary of State and the Carver County Sheriff’s Office for their assistance and full cooperation with this investigation.

Assistant U.S. Attorney Harry M. Jacobs and Trial Attorney Jonathan Jacobson of the Justice Department’s Public Integrity Section are prosecuting this case.

Updated June 16, 2025

Topic

VOTING AND ELECTIONS

Component

[USAO - Minnesota](#)

Related Content