



SECRETARY OF STATE
STATE OF MISSOURI

PROBABLE CAUSE STATEMENT

December 19, 2024

I, Frank A. Jung, General Counsel for the Missouri Secretary of State, knowing that false statements on this form are punishable by law, state that the facts contained herein are true to my knowledge.

1. I have probable cause to believe that Cyndia Haggard, violated Sections 115.637(17) of the Missouri Elections laws by causing a breach of the peace and engaging in disorderly conduct during the verification of the August 2024 Primary Election.

2. The facts supporting this belief are as follows:

(1) On August 9, 2024, the Vernon County Clerk convened election judges to verify the August 2024 Primary Election in a courtroom at the Vernon County Courthouse.

(2) Witnesses stated that Ms. Haggard, who was on the August Primary ballot, attempted to take charge of the verification process. Video shows that Ms. Haggard walking around the courtroom, sitting in the judge's chair, using the judge's telephone and attempting to handle paperwork at the table being used by the verification (election) judges. When Ms. Haggard was told she could not be at the judges table, she refused to leave the area and seat herself in the audience. Ms. Haggard was approached by a bailiff who asked Ms. Haggard to stop handling the paperwork and to return to the area where observers were allowed. Ms. Haggard became verbally combative with the bailiff to the point the bailiff informed Ms. Haggard if she did not leave the judge's area she would be removed from the courtroom. Ms. Haggard did eventually leave voluntarily but not until the verification was significantly delayed to the point one of the judges had to leave.

(3) Section 115.637(17), RSMo. states that any person at any verification location causing any breach of the peace or engaging in disorderly conduct that impedes or interferes with the verification process commits the Class Four Election Offense.

(4) By refusing to leave the area in which only election judges were allowed, and handling paperwork being used to verify the August 2024 Primary, Ms. Haggard impeded and interfered with the verification process in violation of Section 115.637(17).

A handwritten signature in blue ink, appearing to read "F.A. Jung", written over a horizontal line.
Frank A. Jung