LAKE COUNTY BOARD OF ELECTIONS AND REGISTRATION

COMPLAINT FORM

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PLEASE PRINT CLEARLY

Date of complaint: 10/29/2026

Date of Incident: 10/23/2026

Case # (Office Use Only)

Complainant (person submitting the complaint):

Complainant name (may not be anonymous) Jennifer Lowry

Phone (219) 805-2260 **Email**

Complainant address 1911 Burgundy Street **City** Schererville **Zip** 46375

Respondent (person complaint is against):

Respondent name Jerry Schmitt

Phone **Email**

Respondent address **City** **Zip**

Please list any known Indiana Code (Title III) violations: Ind. Code § 3-14-2-16(10)

Jennifer Lowry

Signature of Complainant

Summary of incident (attach additional pages, documents, or evidence for consideration by the LCBER):

See attached complaint

Government Center • 2293 North Main Street • Rm. A-205 • Crown Point, IN 46307-1854
Phone (219) 755-3795 • Fax (219) 755-3801

STATE OF INDIANA)
) **SS:**
COUNTY OF LAKE)

IN THE LAKE COUNTY BOARD OF ELECTIONS AND REGISTRATION

JENNIFER LOWRY,

Complainant,

v.

JERRY SCHMITT,

Respondent.

VERIFIED ELECTION COMPLAINT AND REQUEST FOR INVESTIGATION

Complainant Jennifer Lowry ("Complainant"), by way of complaint against Respondent Jerry Schmitt ("Schmitt" or "Respondent"), alleges as follows:

PARTIES, JURISDICTION, AND GENERAL ALLEGATIONS

1. Complainant Jennifer Lowry is an individual residing at 1911 Burgundy Street, Schererville, Indiana 46375.
2. Respondent Jerry Schmitt is an employee of the Lake County Board of Elections and Registration ("Board").
3. Tom Schmitt is a town councilor for the Town of Schererville, currently running for re-election in the Town of Schererville and the brother of respondent Jerry Schmitt.
4. This Complaint is submitted to the Board pursuant to its procedures for receiving and considering complaints concerning alleged violations of Indiana election law.

COMMON FACTS

9. On or about October 23, 2026, Respondent Jerry Schmitt was observed at the Lake County Government Center in Crown Point, Indiana, handling and removing items identified as absentee ballot materials. The photographs documenting the foregoing events are attached collectively as Exhibit A.
10. The photographs further depict Respondent transporting and delivering the absentee ballots to the post office.
11. Private investigator Joe Broadaway photographed Respondent and Broadaway's affidavit concerning his personal observations, the circumstances under which the photographs were taken, and their authenticity is attached as Exhibit B.

12. Complainant has received information that Respondent is the only employee authorized to transport absentee ballot materials from the Board's offices to the post office meaning that Jerry Schmitt handles Schererville ballots that contain or will contain his brother Tom Schmitt as a candidate.
13. Complainant believes that the conduct depicted in Exhibit A violates both Indiana law and Board policy.

COUNT I — VIOLATION OF INDIANA LAW AND BOARD POLICY

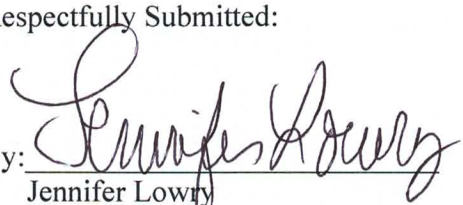
21. Indiana Code § 3-14-2-16(10) addresses unauthorized possession of unmarked absentee ballots and includes an exception for a county election board member or employee acting under the Board's authority and in accordance with state law.
22. The applicability of the exception depends upon the authority under which absentee ballots were possessed and transported, and compliance with both statutory and Board requirements.
23. On March 29, 2022, the Board maintained or circulated a memorandum entitled "Relatives on ballot."
24. A copy of the memorandum is attached as Exhibit C.
25. The memorandum identifies Jerry Schmitt in connection with Tom Schmitt, described therein as his brother and a candidate for Schererville Town Council.
26. The memorandum states that staff members with family members on the ballot shall not handle ballot materials, including ballot cards and applications, in precincts within the voting district in which the family member appears on the ballot.
27. The memorandum also addresses restrictions on employees related to candidates handling ballot materials and refers to an accompanying employee affirmation.
28. By handling all absentee ballots, Respondent Jerry Schmitt's actions violated Board policy and consequently violated Ind. Code § 3-14-2-16(10).
29. Violation of Ind. Code § 3-14-2-16(10) is a Level 6 felony.
30. Ind. Code § 3-6-5-31 provides that when a county election board has substantial reason to believe an election-law violation has occurred, it must investigate expeditiously. After notice and an opportunity for a hearing, if the Board determines that a person has engaged in conduct violating Title 3, it must take appropriate action under the circumstances, including referring the matter to the Attorney General or the appropriate prosecuting attorney.

WHEREFORE, Complainant Jennifer Lowry requests that the Board:

A. Investigate the alleged conduct under Ind. Code § 3-6-5-31;
B. Preserve and examine relevant ballot-handling records, employee affirmations, chain-of-custody records, communications, and other evidence;
C. Provide notice and an opportunity for a hearing as required by law;
D. Determine, for purposes of its statutory authority, whether the evidence establishes conduct violating Title 3 or applicable Board rules or orders;
E. Refer evidence of suspected criminal conduct to the Attorney General or the appropriate prosecuting attorney; and
F. Take such other action as the Board considers appropriate under the circumstances.

I AFFIRM, UNDER THE PENALTIES FOR PERJURY, THAT THE FOREGOING REPRESENTATIONS ARE TRUE.

Respectfully Submitted:

By: 

Jennifer Lowry
1911 Burgundy Street
Schererville, IN 46375
(219) 805-2260

EXHIBIT

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A





EXHIBIT

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A-1

EXHIBIT

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A-2

EXHIBIT
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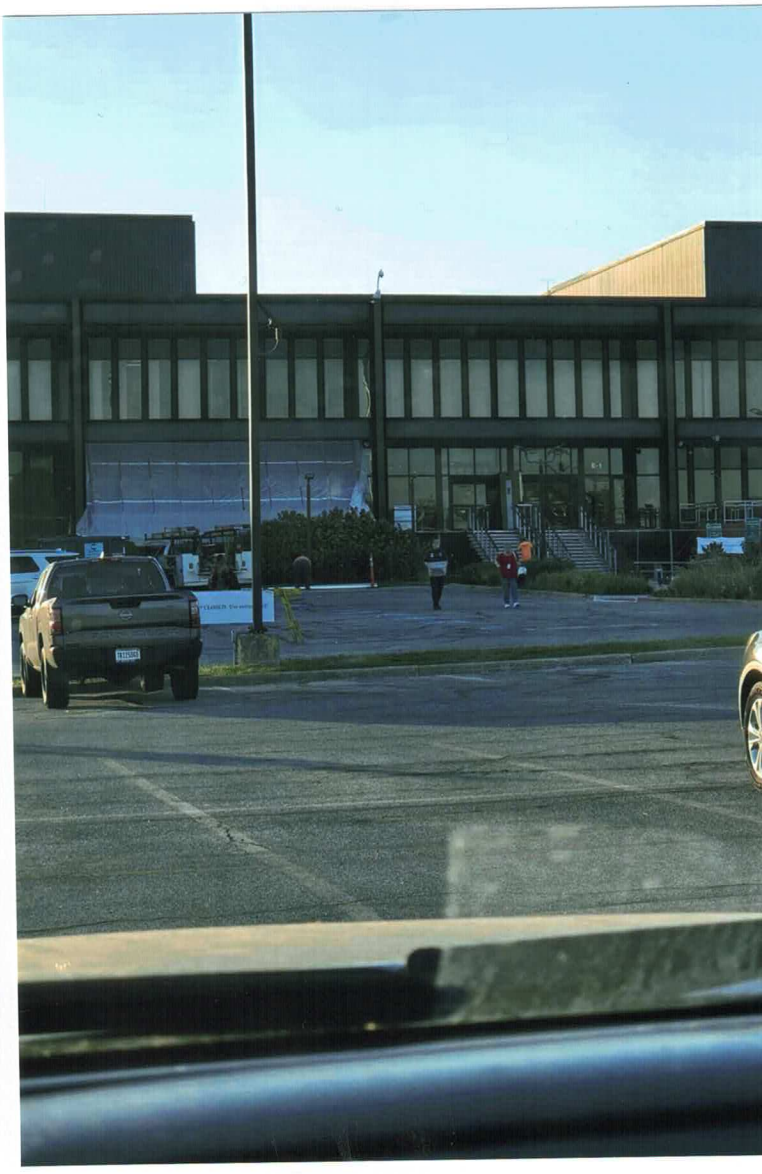


EXHIBIT
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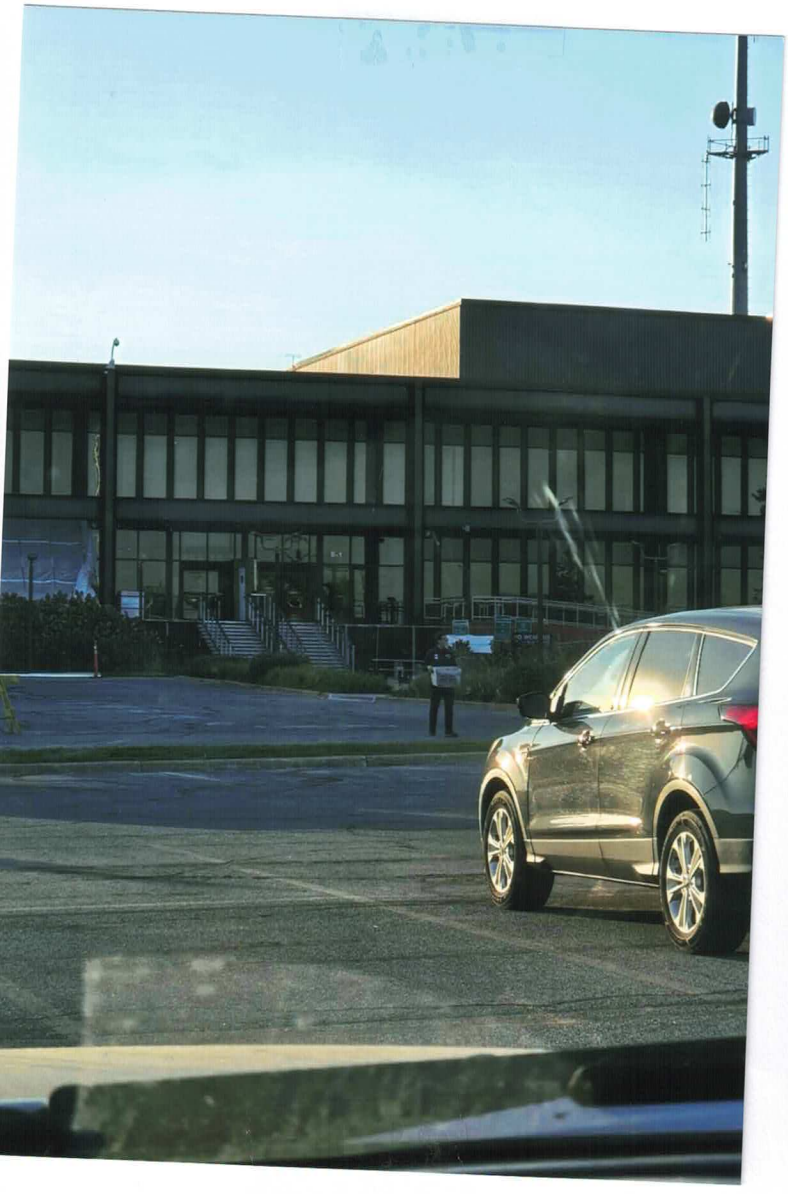


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A-6

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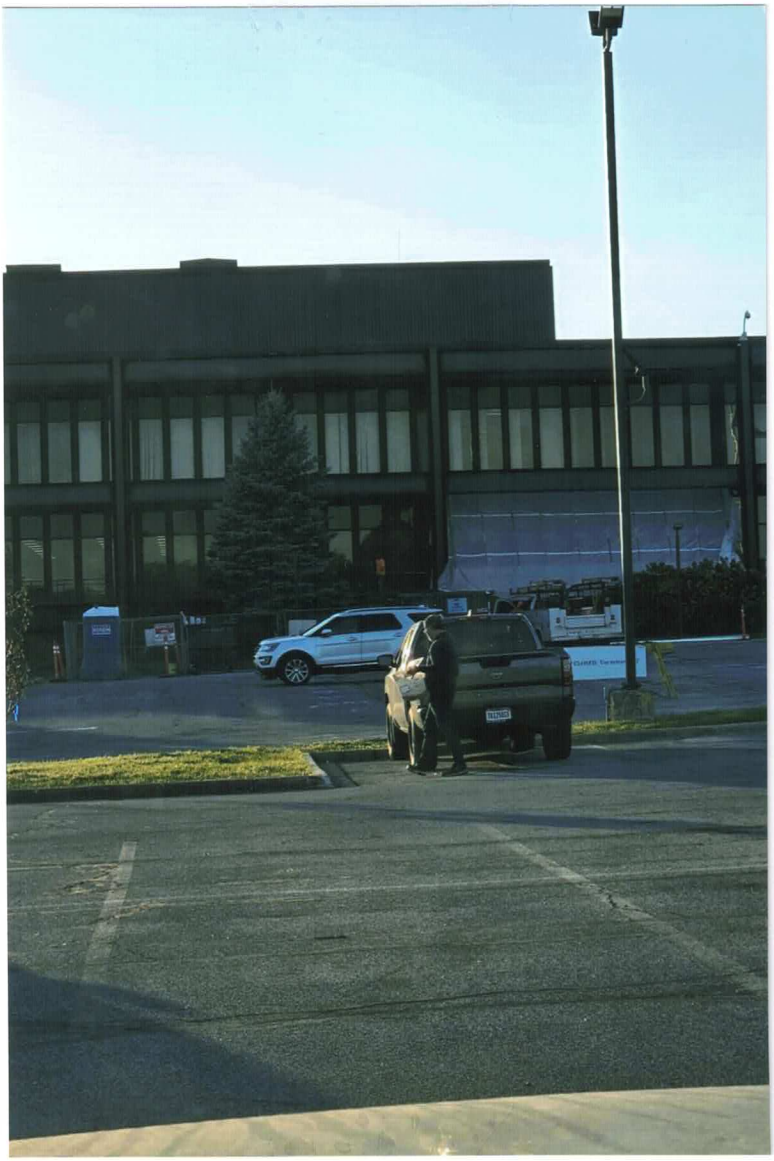


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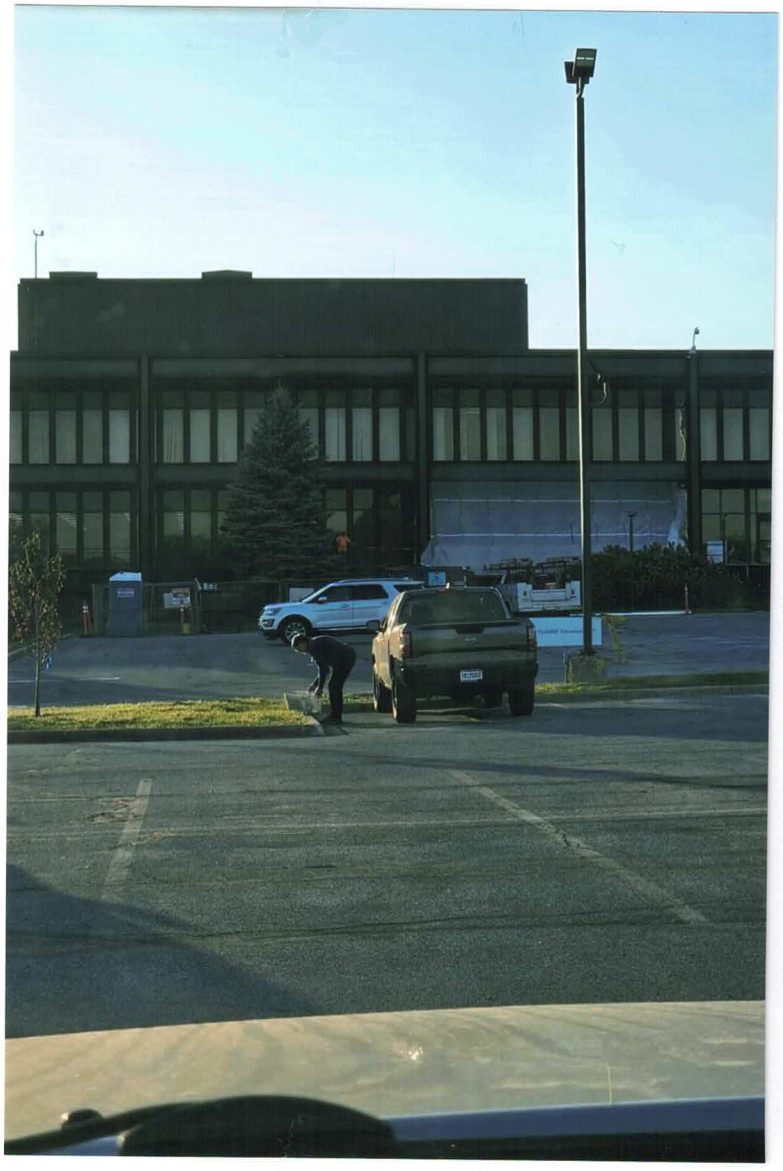


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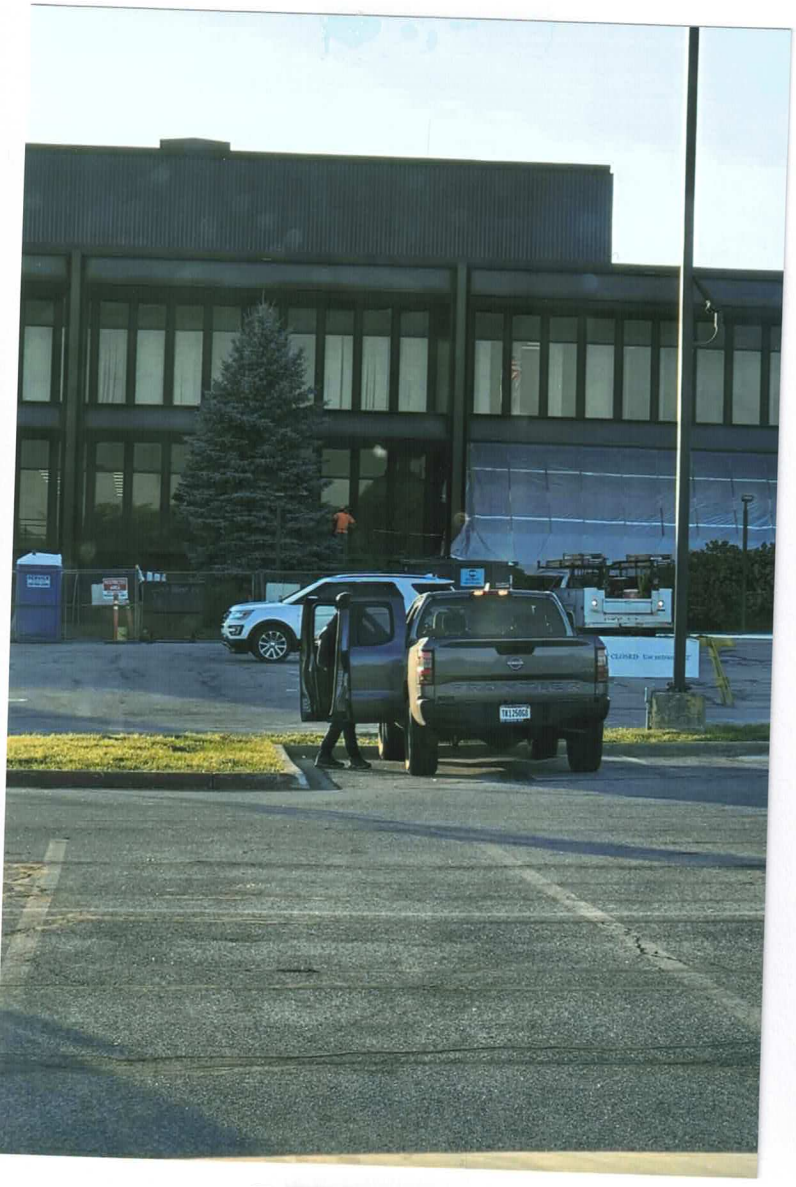


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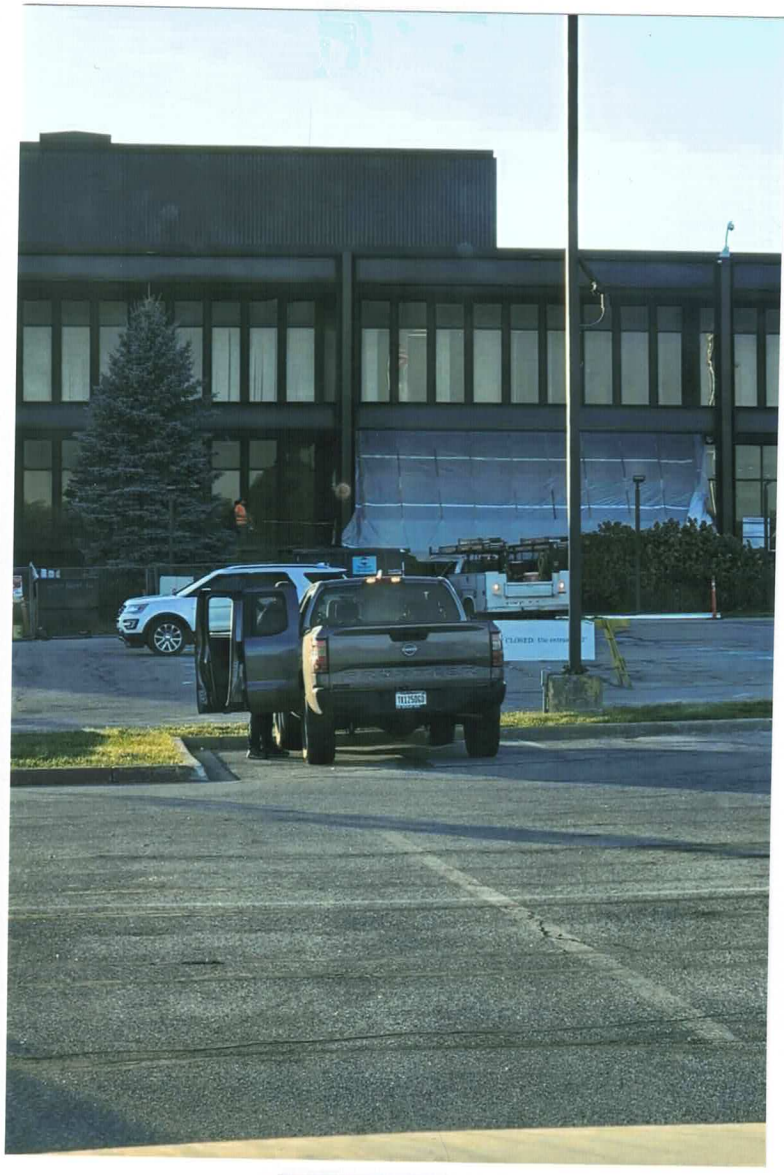


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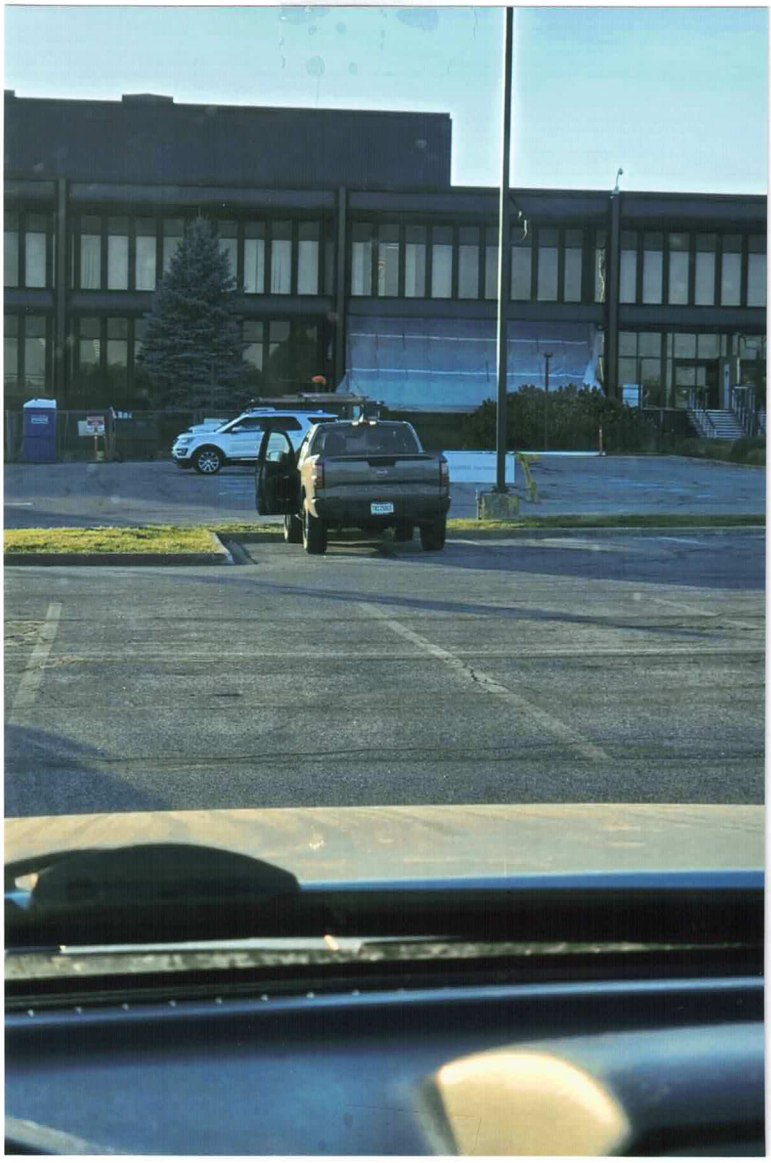


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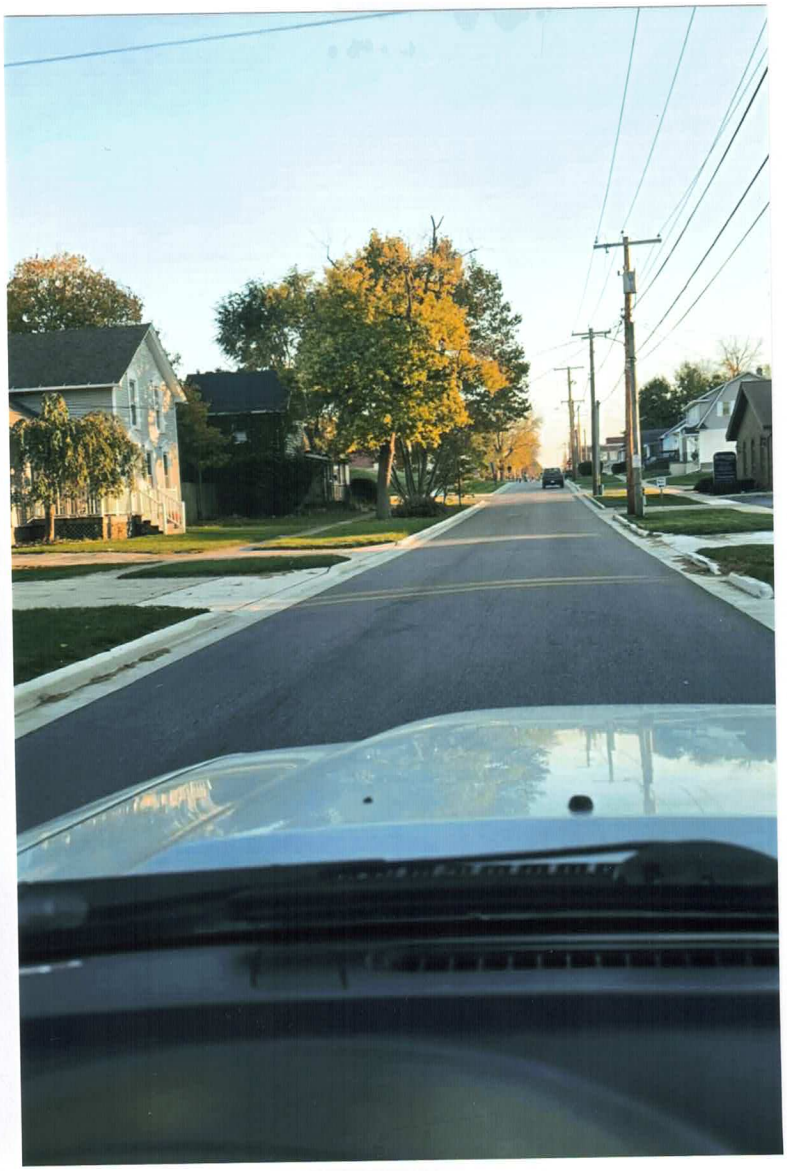


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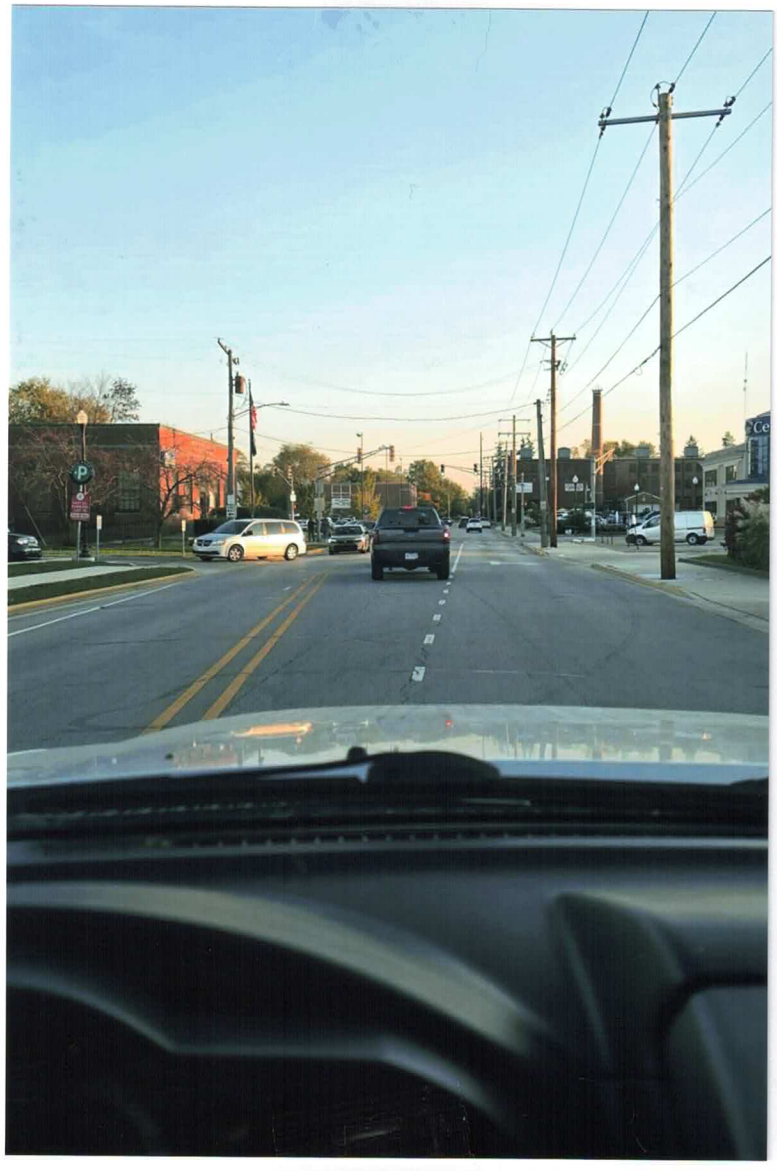


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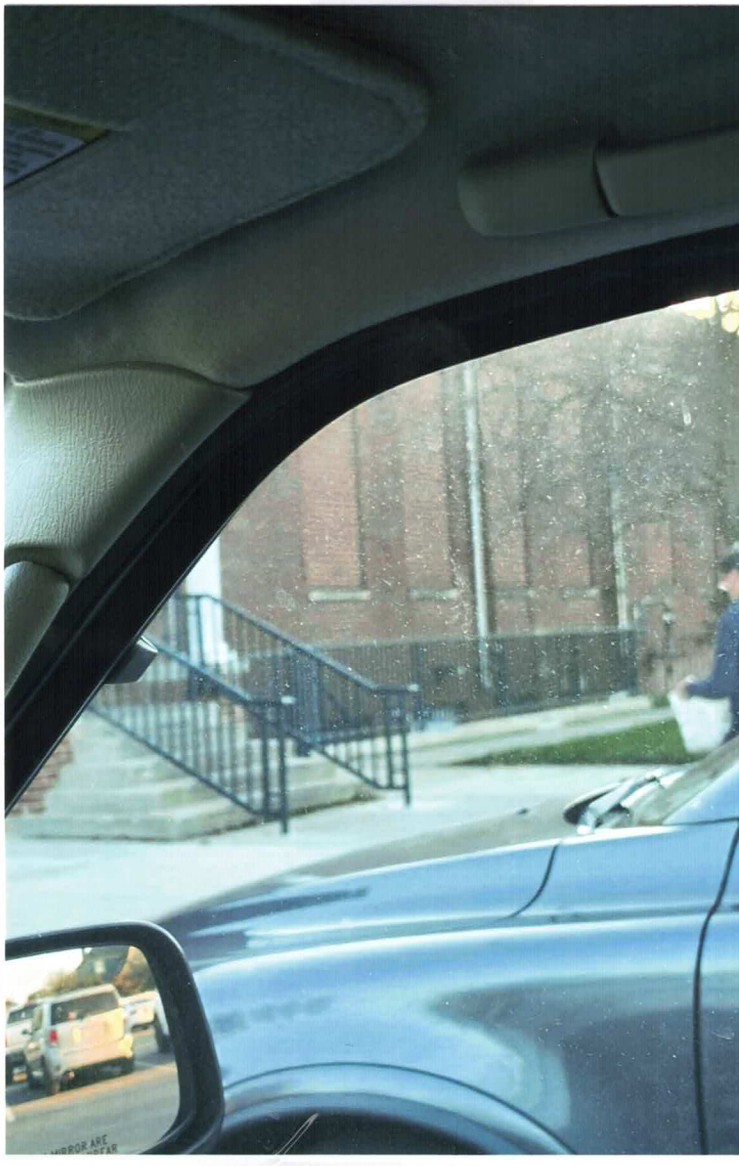


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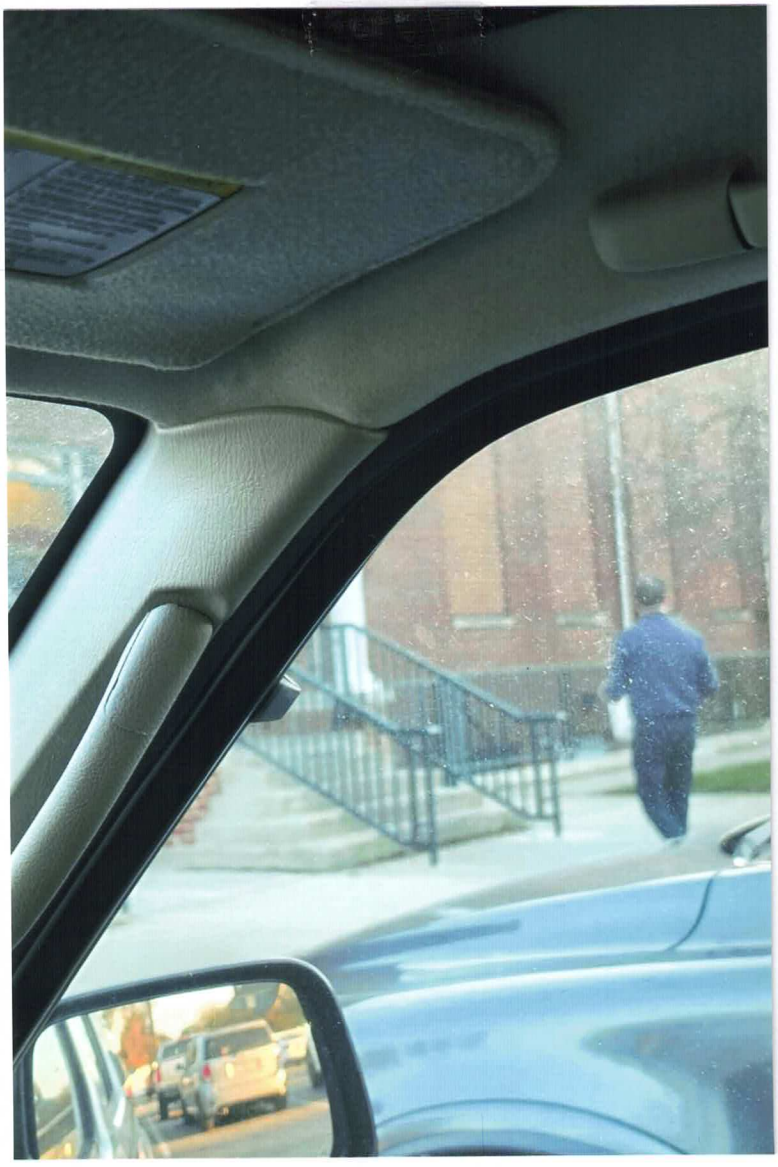


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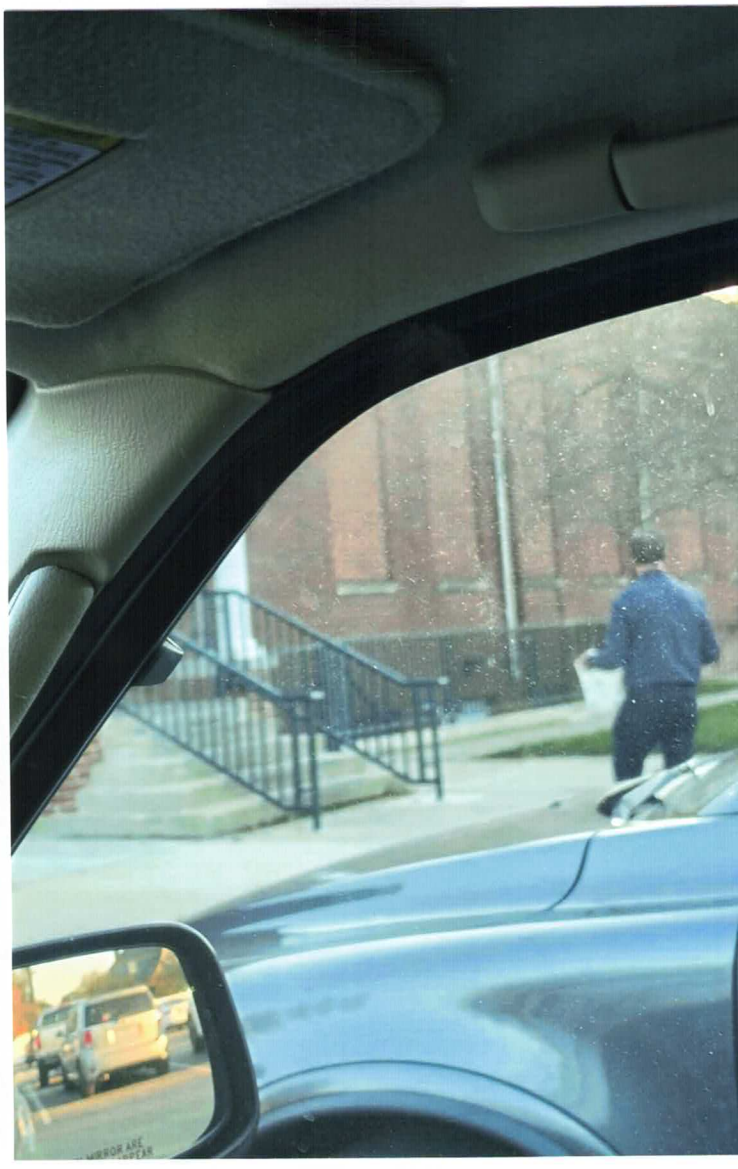


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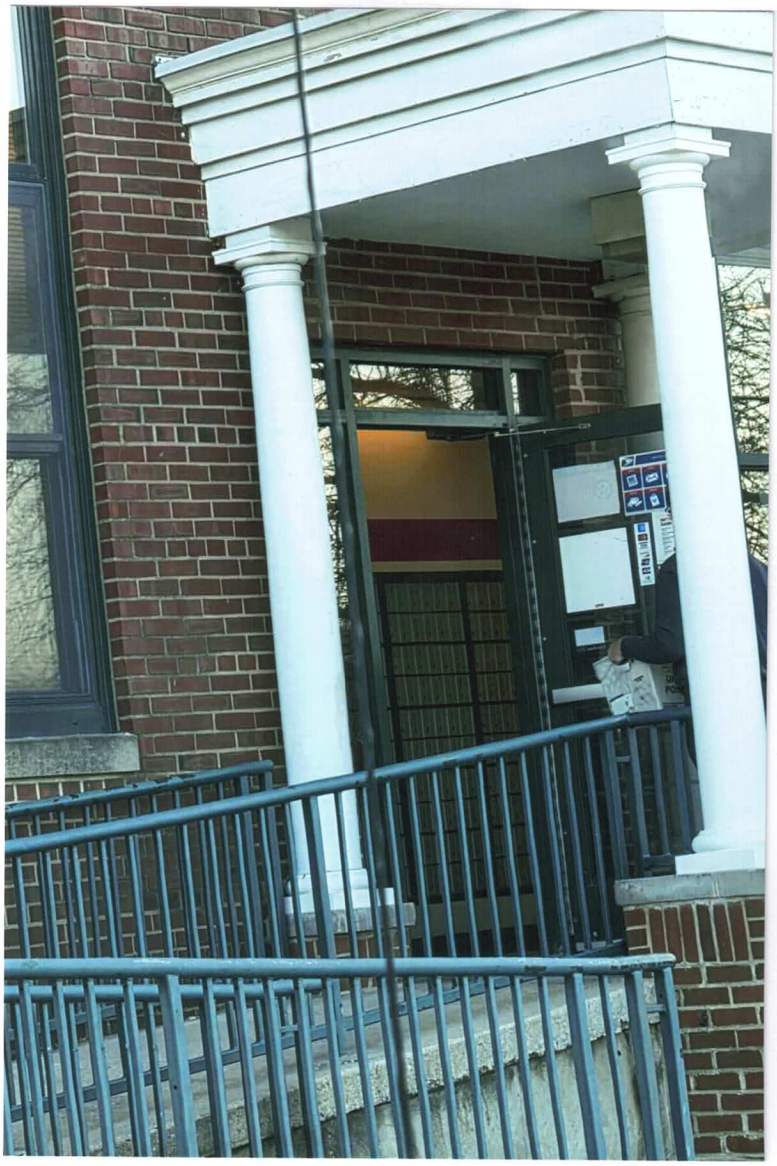


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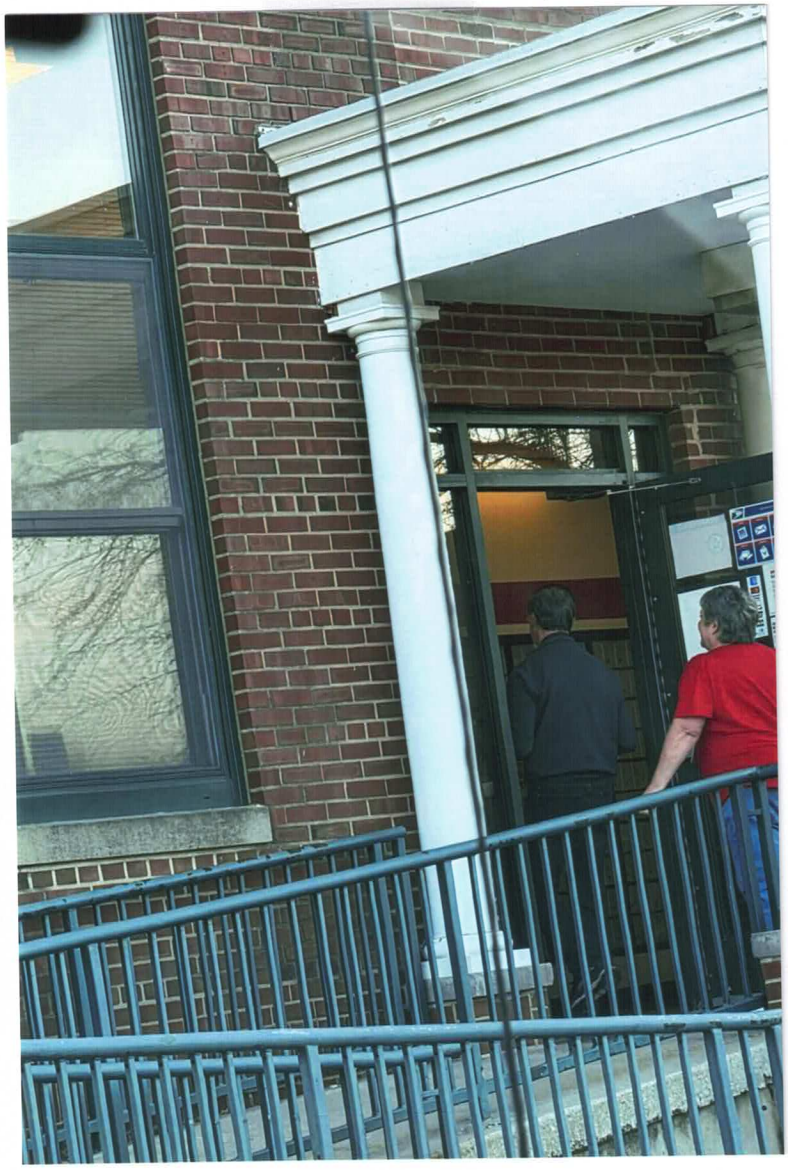


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STATE OF INDIANA)
) **SS:**
COUNTY OF LAKE)

IN THE LAKE COUNTY BOARD OF ELECTIONS AND REGISTRATION

JENNIFER LOWRY,

Complainant,

v.

JERRY SCHMITT,

Respondent.

AFFIDAVIT OF JOE BROADAWAY

I, **Joseph Broadaway**, being first duly sworn upon oath, state as follows:

I. Identity and Competency

1. I am an employee of Mercer Protection and Logistics, Inc, (PI20700123) licensed by the Indiana Department Professional Licensing Agency as a Private Investigator Firm and an Agent of VSI Process Serving and Investigations, Inc. (115.002786) a licensed Illinois Detective Agency.
2. I make this affidavit based upon my personal knowledge, my observations during the investigation described herein, and my handling of the photographic evidence identified in this affidavit.
3. I am over 18 years of age and I am competent to testify to the matters stated herein and, if requested, can testify concerning my observations, the circumstances under which the photographs were taken, and the identification and preservation of those photographs.

II. Investigation and Personal Observations

4. On or about October 23, 2026, I conducted an investigation involving the transportation of items believed to be absentee ballot materials from the Lake County Government Center in Crown Point, Indiana, to a United States Postal Service post office in Crown Point, Indiana.
5. During the investigation, I observed an individual whom I identified as Jerry Schmitt at or near the Lake County Government Center.

EXHIBIT
B

6. My identification of that individual as Jerry Schmitt was based upon accessing his social media account and personal identification.
7. I further verified through the Indiana Department of Vehicles that the Indiana vehicle license plate attached to the grey Nissan pick-up truck depicted in the accompanying photos is registered to Jerry Schmitt.
8. On October 23, 2026 at approximately 5:00 PM, I observed Jerry Schmitt removing or carrying items in a white United States Postal Service box from the Lake County Government Center that have been described to me as absentee ballots ("absentee ballots").
9. I observed Jerry Schmitt depart the east side of the Government Center building with the absentee ballots and proceed toward his vehicle where he placed the items in his vehicle, entered his vehicle and departed the Government Center parking lot via the main entrance on Main Street, Crown Point, Indiana.
10. I subsequently observed Jerry Schmitt arrive at the United States Postal Service post office located at 128 S. East Street, Crown Point, Indiana.
11. At the post office, I observed Jerry Schmitt park, remove the absentee ballots from his vehicle where Schmitt was met by an older, Caucasian female of approximate age late 50s-early 60s who opened the door and accompanied Schmitt into the building.
12. Schmitt spent approximately three minutes in the post office building, then departed with nothing in his hands.
13. My statements concerning the individual's movements, the absentee ballots carried, and the delivery activity are based upon my personal observations, except as expressly stated otherwise.

III. Photographic Evidence

14. During the course of the investigation, I took photographs documenting the activities described above.
15. The photographs are attached hereto collectively as Exhibit A and are identified individually as Photographs A-1 through A-21.
16. I personally took the photographs identified in Exhibit A on the following dates and at the following approximate times: October 23, 2026 at approximately 5:00 PM.
17. I recognize the photographs as images I personally captured during the investigation.

18. Each photograph fairly and accurately depicts the person, location, objects, and activities visible in the image as I observed them at the time the photograph was taken, subject to the limitations of the camera angle, distance, lighting, and other conditions affecting what is visible.
19. The photographs have been reviewed by me for purposes of identifying them in this affidavit.
20. The original files, available metadata, contemporaneous notes, and other records relating to the photographs are maintained as follows: 15742 Harrison Street, Crown Point, IN 46307.
21. I have not knowingly substituted photographs from another event or location for photographs taken during the investigation described herein.

IV. Identification of the Evidence

24. I can identify the locations depicted in the photographs to the extent stated in this affidavit based upon my personal observations and familiarity with the locations.
25. The photographs depict the individual, items, and activities visible within their respective frames. They do not necessarily depict every event occurring before, during, or after the moments captured.

V. Purpose of Affidavit

30. I execute this affidavit to authenticate the photographs identified in Exhibit A, establish the circumstances under which I obtained them, and document the observations I personally made during the investigation.
31. I understand that this affidavit may be submitted to the Lake County Board of Elections and Registration in support of an election complaint concerning the transportation and delivery of items identified as absentee ballots.
32. I am willing to testify, if lawfully requested, concerning the matters within my personal knowledge stated in this affidavit.

****SIGNATURE PAGE TO FOLLOW*****

I AFFIRM, UNDER THE PENALTIES FOR PERJURY, THAT THE FOREGOING REPRESENTATIONS ARE TRUE.

JOSEPH BROADAWAY

State of Indiana)
) SS:
County of Lake)

Before me the undersigned, A Notary Public for Lake County, State of Indiana, personally appeared **JOSEPH BROADAWAY** and acknowledged the execution of this instrument this 29th day of October, 2026.

(seal)

CHRISTA GARCIA
Notary Public
Jasper County - State of Indiana
Commission Number NP0000773031
My Commission Expires Aug 31, 2034

Notary Public

My commission expires _____.

LAKE COUNTY BOARD OF ELECTIONS AND REGISTRATION

March 29, 2022

Relatives on ballot

We have several members of the staff, as shown below, who are related to candidates in the 2022 Primary Election. In order to allow for the processing of the election while avoiding any appearance of impropriety, Michelle and I have discussed implementing the following measures and would like your input. As a note, ballot cards and secrecy envelopes are prepared for the entire county and are not separated by precinct.

1. Staff members with family on the ballot shall not handle, in any way, ballot materials (including but not limited to ballot cards and applications) in any of the precincts included in the voting district in which the family member is on the ballot.

2. Staff members with family on the ballot shall not initial any ballot cards or secrecy envelopes during the election in which the family member is on the ballot.

- LeAnn Angerman – Todd Angerman (spouse) for Lowell Town Council
- Lori ODea – Dan Dernulc (brother-in-law) for State Senate, Dist. 1
- Juanita Trivunovic – Lorenzo Arredondo (uncle) for Circuit Court Clerk
- Camila Trevino –Olvera – Lorenzo Arredondo (uncle) for Circuit Court Clerk
- Jerry Schmitt – Tom Schmitt (brother) for Schererville Town Council
- Kelly Depirro – Roger Depirro (spouse) for St. John Township Board Member
- Genny Gasparovic – Sherry Gasparovic (sister-in-law, brother deceased) for Winfield Township Board

Attorney comments:

Atty. Tolbert - This sounds reasonable to me. Probably does not need board action but definitely should be discussed for the sake of the minutes.

Atty. Brandenburg - I agree with Mike. I think it's reasonable and agree it should be discussed at the upcoming meeting. If the board wants to formally adopt it as a new/ revised procedure, it can do so.

Government Center • 2293 North Main Street • Crown Point, IN 46307-1854
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EXHIBIT
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