- 409th

RE-INDICTMENT

9662140

CONTROL NO.: 19-07656-CR

STATE OF TEXAS PATRICK WOOD CRUSIUS

Count

Offense

CAPITAL MURDER OF MULTIPLE PERSONS

AGG ASSLT W/DEADLY WEAPON II-XXIII

### IN THE NAME AND BY THE AUTHORITY OF THE STATE OF TEXAS

The Grand Jurors for the County of El Paso, State of Texas, duly organized as such, at the January Term, A.D., 2020, of the Judicial District Court for said County, upon their oaths in said Court, present that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso, and State of Texas, Build No. in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant, did then and there murder more than one person during the same criminal transaction, to wit: did then and there intentionally or knowingly cause the death of an individual, namely, Maria Legarreta Rothe, by shooting her with a firearm, and did then and there also intentionally or knowingly cause the death(s) of one or more of the following individuals:

Jorge Calvillo Garcia, Alexander Gerhard Hoffman, Elsa Mendoza Marquez, Leonardo Campos, Margie Reckard, Maribel Loya, Ivan Manzano, Andre Anchondo, Gloria Marquez, Javier Rodriguez, Sara Regalado Monreal, Adolfo Cerros Hernandez, David Johnson, Arturo Benavides, Luis Juarez, Maria Muñoz Flores. Raul Estrada Flores, Angelina Silva Englisbee, Jordan Jamrowski, Teresa Guerra Sanchez, Juan De Dios Velazquez, or Guillermo Garcia

by shooting them with a firearm.

And the Grand Jurors flight from said felon	s do further present that the said Defendant by offense,	did use or exhibit a deadly weapon, to wit: a firearm, during the commission of or immediate
	AGAINST TH	Grand Jury Foreperson
Filed the	JUN 2 5 2020	By: E word Deputy
THE STATE OF COUNTY OF EL		
	foregoing is a true and correct copy of fice in El Paso, Texas on the	of the original Indictment on file in my office. Given under my hand and seal of 1/2 5 2020
		Norma Favela Barceleau District Clerk El Paso County, Texas
		By: Deputy
Bail Amount: \$		

### STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT II

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Enrique Atilano by shooting him with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Enrique Atilano because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

		Grand	Jury Foreperson	
Filed the	JUN 2 5 2020	By:	Elland	
THE STATE OF TEXAS	S			

COUNTY OF EL PASO

I certify that the foregoing is a true and correct copy of the original Indictment on file in my office. Given under my hand and seal of the court at my office in El Paso, Texas on the

JUN 25 2020 Norma Favela Barceleau District Clerk El Paso County, Texas

By: Deputy

# STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT III

Bail Amount: \$

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Luis Ever Calvillo by shooting him with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Luis Ever Calvillo because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

# STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT IV

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Mario de Alba Montes by shooting him with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Mario de Alba Montes because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

		Grand .	Jury Foreperson	
Filed the	JUN 2 5 2020	By:	E Ward Deputy	
THE STATE OF TEXAS				

THE STATE OF TEXAS COUNTY OF EL PASO

I certify that the foregoing is a true and correct copy of the original Indictment on file in my office. Given under my hand and seal of the court at my office in El Paso, Texas on the JUN 25 2020

Norma Favela Barceleau District Clerk El Paso County, Texas

By:

Deputy

# STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT V

Bail Amount: \$

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Erika de Alba Rodriguez by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Erika de Alba Rodriguez because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

### STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT VI

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Oliva Rodriguez Mariscal by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Oliva Rodriguez Mariscal because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

		Grand Jury Foreperson
Filed the	JUN 2 5 2020	By: Deputy
THE STATE OF COUNTY OF E		
I certify that the the court at my o	foregoing is a true and correct copy of ffice in El Paso, Texas on the	the original Indictment on file in my office. Given under my hand and seal of 2 2 2020
		Norma Favela Barceleau District Clerk El Paso County, Texas
		By: Deputy
Bail Amount: \$		

# STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT VII

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Jessica Garcia by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Jessica Garcia because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

### THE STATE OF TEXAS COUNTY OF EL PASO

Norma Favela Barceleau District Clerk El Paso County, Texas

By:

Deputy

### STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT VIII

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Michelle Grady by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Michelle Grady because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Norma Favela Barceleau District Clerk El Paso County, Texas

By:

Deputy

# STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT IX

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Maribel Latin Saenz by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Maribel Latin Saenz because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

		Grand	Jury Foreperson
Filed the	JUN 2 5 2020	Ву:	E Ward
THE STATE OF TEXAS COUNTY OF EL PASO			
I certify that the foregoing the court at my office in El		nal Indic	tment on file in my office. Given under my hand and seal of
		Norma	Favela Barceleau
			t Clerk o County, Texas
			o County, Texas
		By:	Deputy
Bail Amount: \$			

### STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT X

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Ernest Christopher Grant by shooting him with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Ernest Christopher Grant because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

### THE STATE OF TEXAS COUNTY OF EL PASO

Norma Favela Barceleau
District Clerk
El Paso County, Texas

El Paso County, Texas

By: Deputy

### STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT XI

Bail Amount: \$

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Liliana Munoz Puente by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Liliana Munoz Puente because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

### STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT XII

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Jeremy Avila by shooting him with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Jeremy Avila because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Grand Jury Foreperson JUN 25 2020 By: Filed the \_\_\_

#### THE STATE OF TEXAS COUNTY OF EL PASO

Norma Favela Barceleau District Clerk El Paso County, Texas

By:

Deputy

### STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT XIII

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Octavio Lizarde by shooting him with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Octavio Lizarde because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

		Grand Jury Foreperson
Filed the	JUN 2 5 2020	By: El Ward
THE STATE OF TEXAS COUNTY OF EL PASO		
I certify that the foregoing is the court at my office in El Pa	a true and correct copy of the aso, Texas on the	original Indictment on file in my office. Given under my hand and seal of <b>2020</b> .
		Norma Favela Barceleau District Clerk El Paso County, Texas
		By: Deputy
Bail Amount: \$		

### STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT XIV

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Martha Juarez by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Martha Juarez because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

	Grand Jury Foreperson
JUN 2 5 2020	C 1 2 2
Filed the	By: CUCICL Deputy
THE STATE OF TEXAS COUNTY OF EL PASO	
I certify that the foregoing is a true and correct copy of the origin the court at my office in El Paso, Texas on the	nal Indictment on file in my office. Given under my hand and seal of
	Norma Favela Barceleau District Clerk El Paso County, Texas
	By: Deputy
Bail Amount: \$	

# STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT XV

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Rosa Calderon by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Rosa Calderon because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

I certify that the foregoing is a true and correct copy of the original Indictment on file in my office. Given under my hand and seal of the court at my office in El Paso, Texas on the JUN 25 2020

Norma Favela Barceleau District Clerk El Paso County, Texas

By:

Deputy

# STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT XVI

Bail Amount: \$

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Mario Perez Briones by shooting him with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Mario Perez Briones because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

### STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT XVII

Bail Amount: \$

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Rosa Barron by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Rosa Barron because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

	$\mathcal{V}_{G}$	rand Jury Foreperson	
Filed theJUN	<b>2 5 2020</b> B	7: Deputy	liand
THE STATE OF TEXAS COUNTY OF EL PASO			
I certify that the foregoing is a true and the court at my office in El Paso, Texas	d correct copy of the original less on the	ndictment on file in m	y office. Given under my hand and seal of
	D	orma Favela Barceleau strict Clerk Paso County, Texas	1
	В	y: Deputy	

# STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT XVIII

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood CRUSIUS, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Rosemary Vega by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Rosemary Vega because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

COUNTY OF EL PASO

Norma Favela Barceleau District Clerk El Paso County, Texas

By:

Deputy

### STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT XIX

Bail Amount: \$

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Monica Arciniega by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Monica Arciniega because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

1	Grand Jury Foreperson
JUN 2 5 2020	By: Cland
THE STATE OF TEXAS COUNTY OF EL PASO	
I certify that the foregoing is a true and correct copy of the original the court at my office in El Paso, Texas on the	nal Indictment on file in my office. Given under my hand and seal of
	Norma Favela Barceleau District Clerk El Paso County, Texas
	By:

### STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT XX

Bail Amount: \$

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood CRUSIUS, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Anna Gonzalez by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Anna Gonzalez because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

# STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT XXI

Bail Amount: \$

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Maria Magdalena Gonzalez Garcia by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Maria Magdalena Gonzalez Garcia because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

### STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT XXII

Bail Amount: \$

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Alma Enriquez by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Alma Enriquez because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

		Orand Jury Foreperson
Filed the	JUN 2 5 2020	By: E LLOCOL
THE STATE O		
I certify that the	e foregoing is a true and correct copy office in El Paso, Texas on the	f the original Indictment on file in my office. Given under my hand and seal o
		Norma Favela Barceleau District Clerk El Paso County, Texas
		By:

### STATE OF TEXAS VS PATRICK WOOD CRUSIUS RE-INDICTMENT - AGG ASSLT W/DEADLY WEAPON COUNT XXIII

And the Grand Jurors of aforesaid, upon their oaths aforesaid, do further say, charge and present in and to said Court at said term that on or about the 3rd day of August, 2019, and anterior to the presentment of this indictment, in the County of El Paso and State of Texas, Patrick Wood Crusius, hereinafter referred to as Defendant,

did then and there intentionally, knowingly, or recklessly cause bodily injury to Nicolasa Mena de Velazquez by shooting her with a firearm, and the defendant did then and there use or exhibit a deadly weapon during the commission of said assault, to-wit: a firearm,

And it is further presented that the defendant intentionally selected Nicolasa Mena de Velazquez because of the defendant's bias or prejudice against a group identified by race, color, national origin, or ancestry,

	Grand Jury Foreperson	
Filed the	By: Deputy	
THE STATE OF TEXAS COUNTY OF EL PASO		
I certify that the foregoing is a true and correct copy of the the court at my office in El Paso, Texas on the	original Indictment on file in my office. Given under my hand and 2 5 2020	seal of
	Norma Favela Barceleau District Clerk El Paso County, Texas	
	70	
	By: Deputy	