

THE STATE OF TEXAS  
 VS.  
**MASON WILLIAM HERRING**  
 ■■■ HOLY ROOD LN  
 HOUSTON TX 77024

SPN: 03145091  
 DOB: W M 11/10/1984  
 DATE PREPARED: 05/25/2022

D.A. LOG NUMBER: 2841402  
 CJIS TRACKING NO.:  
 AGENCY:HPD  
 O/R NO: 055530122  
 ARREST DATE: TO BE

NCIC CODE: 1399 85

RELATED CASES: SD-2 CHARGES

FELONY CHARGE: Assault

CAUSE NO: 1772105  
 HARRIS COUNTY DISTRICT COURT NO: 185  
 FIRST SETTING DATE:

COURT ORDERED BAIL: TO BE SET AT  
 MAGISTRATION  
 PRIOR CAUSE NO:  
 CHARGE SEQ NUM (1)

**IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:**

Before me, the undersigned Assistant District Attorney of Harris County, Texas, this day appeared the undersigned affiant, who under oath says that he has good reason to believe and does believe that in Harris County, Texas, **MASON WILLIAM HERRING**, hereafter styled the Defendant, heretofore on or about **March 17, 2022**, did then and there unlawfully, Allege one or more conjunctively: intentionally and knowingly cause bodily injury to Catherine Herring by placing a substance containing the drug Misoprostol into a liquid and giving it to the Complainant to ingest, and the defendant committed the assault to force the Complainant to have an abortion..

**Probable Cause**

Affiant A. Otero, a certified peace officer employed with the Houston Police Department as an Investigator in the Major Assaults and Family Violence Division, does solemnly swear that he has reason to believe and does believe that Mason Herring, a white male with date of birth November 10, 1984, did on or about March 17, 2022 commit the felony offenses of Assault on a Pregnant Person and Assault to Force Abortion in Harris County, Houston TX.

On April 27, 2022, Affiant received a walk-in complainant wishing to file a report. The complainant, identified as Catherine Herring and a person I found to be credible and reliable, wished to pursue charges against Defendant for suspected poisoning. Affiant conducted a digitally recorded interview with Complainant. The complainant stated that she knows Defendant by name and by sight as her husband of eleven years. Complainant stated that on February 22, 2022, she confronted Defendant about lying about his whereabouts and continuing conversation with another female he had previously told her that he had fired and that he was no longer speaking to her. Complainant stated that Defendant then told her that he wanted to separate and that his relationship with other female had changed and they were now sending flirtatious texts. Complainant stated that they separated and agreed to go to couples counseling. Complainant stated that Defendant left their home and began staying at an unknown location.

Complainant stated that shortly after that, she learned that she was pregnant and knew it was the Defendant's child because she had not been intimate with anyone else. On March 8, 2022, Complainant stated that she and Defendant were in a couples counseling session and she informed him that she was pregnant. Complainant stated that Defendant had a negative reaction and after that evening, he sent her text messages expressing that he was not happy about the pregnancy and did not know what to do. Complainant stated that Defendant stated that this would ruin his plans and make him look like a jerk. Complainant stated that the couples counselor suggested that they spend spring break together.

Complainant stated that from March 12 to March 16, 2022, she and Defendant spent spring break together in West Texas with their children. Complainant stated that during that time, Defendant began talking to her about her hydration, stating that she needed to drink more water.

Complainant stated that on March 17, 2022 at approximately 8:00am, Defendant came to her residence, located at 711 Holy Rood Lane, Houston, Harris County, Texas, and brought her breakfast and a cup full of water. Complainant stated that Defendant presented the cup of water and told her that she needed to drink more and that he would not leave until she drank the whole cup. Complainant stated that she drank out of the cup and stopped to take a breath, noticing that the water inside the cup appeared to be cloudy. Complainant stated that she questioned Defendant about this and he stated that perhaps the cup was dirty or the pipes were dirty. Complainant stated that Defendant then took the cup and left.

Complainant stated that approximately thirty minutes later, she became very ill. She stated that she was suffering from extreme painful cramping and had such an intense urge to have diarrhea that she was unable to make it to the bathroom in time before soiling herself. Complainant stated that she went back to bed and shortly after had to return to the restroom with more diarrhea. She stated that she then began to suspect that something had been placed in her drink and that perhaps it was some kind of abortion drug due to her symptoms and the Defendant's reaction to finding out that she was pregnant. Complainant stated that she had two more bouts of diarrhea and on the final time, she discovered that she was bleeding. Complainant stated that it was a large amount of blood, much like having her period. Complainant stated that she then went to the emergency room for treatment where she provided a urine sample and observed that it was nearly black in color. She stated that she continued bleeding until after leaving the hospital later that evening.

Complainant stated that on March 18, 2022 at her residence, Defendant attempted to give her another beverage in an orange sports bottle. Complainant stated that she did not drink from this beverage and saved it because she observed an unknown substance inside of the liquid.

Complainant stated that Defendant attempted to give her another drink on March 21, 2022 and March 22, 2022, again at her residence. Complainant stated that in both of these beverages, she observed an unknown substance in of the liquid. Complainant stated that the beverage provided by the Defendant on March 22, 2022 was a bottle of orange juice and she observed that the seal on the bottle was broken and the bottle had been opened before the Defendant gave it to her.

Complainant stated that on April 20, 2022, she invited witnesses Kelly Elliot and Patty Smolik to her residence due to being concerned about Defendant. Complainant stated that Defendant arrived at the residence to bring breakfast and take their child to school. She stated that he attempted to give her another beverage to drink even though she had two in front of her already. Complainant stated that she and both witnesses observed that the drink Defendant gave Complainant contained an unknown substance floating in it.

Complainant stated that on April 21, 2022, Defendant came to her residence and brought her a drink from Sonic that she observed to contain an unknown substance.

Complainant stated that she had cameras installed on the outside of her residence. She stated that on April 24, 2022, she observed on the cameras that Defendant had cleaned out his truck and took the trash to the curb. Complainant stated that this was out of character for Defendant as he does not do chores around the house. Complainant stated that when Defendant left residence, she went to the trash can to see what was inside. Complainant stated that she then found opened blister packs labeled as "Cyrux," which she discovered was a Mexican pharmacy version of the American drug Cytotec and the main ingredient of which is Misoprostol, a drug that the Complainant knows is used to cause abortion.

Complainant stated that on April 26, 2022, Defendant came to her residence and she observed him preparing her a beverage in the kitchen. Complainant stated that she observed Defendant pull a Ziploc bag out of his pocket, empty its contents into the beverage then gave the drink to her in her bedroom. Complainant stated that she again observed an unknown substance in the liquid.

Complainant stated that she did not drink any more of the drinks provided by Defendant besides the first one that resulted in the cramping, diarrhea and bleeding.

On May 4, 2022, Affiant conducted a digitally recorded interview with Dr. Jason Cooper, a credible and reliable person who is the Complainant's treating OBGYN. Dr. Cooper informed Affiant that the drug Misoprostol could be used to cause a miscarriage due to causing strong uterine contractions. He stated that taking the drug could terminate a pregnancy and thus kill any unborn child in the pregnant woman. He stated that the drug could also cause diarrhea and bleeding, which is consistent with the symptoms described and exhibited by the Complainant. He also stated that the drug could cause shortness of breath and heart, liver and renal necrosis. In his opinion, giving someone this drug in an unknown amount is an assault.

Affiant observed digitally recorded videos provided by Complainant. Affiant observed Defendant cleaning his truck and taking the trash out, consistent with the Complainant statements. Affiant also observed Defendant preparing a drink in the kitchen, taking a Ziploc bag out of his pocket, and emptying the contents into the drink. Affiant then observed Defendant pour in some cranberry juice and add water to the drink. Affiant also reviewed digital photographs provided by Complainant of the drinks that the Defendant provided to her. Affiant observed an unknown substance in all of the drinks Complainant stated were provided to her by Defendant.

Based on the information provided by the Complainant, Affiant obtained the Defendant's Texas driver's license #09177264 photo and presented it to the Complainant, who positively identified him as Mason William Herring, DOB 11/10/1984, and the person who provided her with multiple drinks that she believed contained a substance intended to cause her to abort her unborn child and caused painful cramping, diarrhea and bleeding after she consumed one of them.

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Signed and sworn by me on 5-25-22

Duly attested by me on 5-25-22



AFFIANT



SBN: 24004735

Assistant District Attorney  
Harris County District Attorney's Office  
TBC No.



Witness (Peace Officer)

Alejandro Camacho 05397

Witness Printed name & Badge or Payroll number

COMPLAINT

**FILED**  
Marilyn Burgess  
District Clerk

MAY 25 2022

Time: 12:30  
Harris County, Texas

By NLO  
Deputy

1772105-185 ✓

COPY OF COMPLAINT/WARRANT DELIVERED TO  
Officer's name: [Signature]  
Police agency: HPB  
Phone no: 05-25-2022 date/time: 13:45