

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE # 11 CRS 13305

STATE OF NORTH CAROLINA

v.

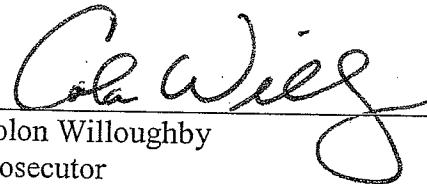
INDICTMENT – FALSE REPORTS

Trawick Hamilton Stubbs

The jurors for the State upon their oath present that on or between January 1, 2007 and February 1, 2009 in Wake County the defendant named above unlawfully, willfully and feloniously did cause the Bev Perdue Committee (hereinafter the Committee), a candidate committee constituted under Article 22A of Chapter 163 of the North Carolina General Statutes, to certify as true and correct campaign reports required to be certified and filed with the North Carolina State Board of Elections, when the defendant knew the reports were not true and correct: to wit, the reports failed to include contributions and/or loans and expenditures by the defendant and Stubbs and Perdue, PA used to pay for airplane travel for the Committee. This conduct was against the peace and dignity of the State and in violation of G.S. 163-278.9(5a), 163-278.9(g), 163-278.11(a)(1), 163-278.11(a)(3), 163-278.11(b), 163-278.27(a1), and 163-278.32.

The State alleges the existence of the following statutory aggravating factors: 15A-1340.16 (d) (1), (2) and (5).

The State alleges the existence of the following non-statutory aggravating factors: That the defendant is a lawyer and has been licensed to practice law in North Carolina for more than 15 years. (2) That the defendant has served as the treasurer of a political action committee for a candidate for statewide office in North Carolina and has filed campaign disclosure reports with the North Carolina Board of Elections.



Colon Willoughby
Prosecutor

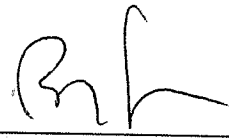
K. Perry, SBI

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:

A TRUE BILL by twelve or more grand jurors, and the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

NOT A TRUE BILL

 NOV 28 2011
DATE

 
Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE # 11 CRS 13304

STATE OF NORTH CAROLINA

v.

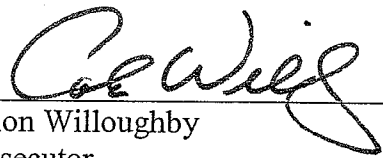
INDICTMENT – OBSTRUCTION OF JUSTICE

Trawick Hamilton Stubbs

The jurors for the State upon their oath present that on or between January 1, 2007 and February 1, 2009 in Wake County the defendant named above unlawfully, willfully and feloniously did, in secret and with malice, and with deceit and intent to defraud obstruct public justice, after making the maximum contributions allowed by law to the Bev Perdue Committee(hereinafter the Committee) by contributing \$4,000 on July 14, 2005 during the primary election cycle and by contributing \$4,000 on June 13, 2008 during the general election cycle, the defendant contributed and / or loaned or paid expenses of over \$28,000, by and through defendant's law firm, Stubbs and Perdue, PA by paying for numerous flights for the use and benefit of the Committee between January 1, 2007 and November 1, 2008, the cost of which exceeded \$28,000. The payment of over \$28,000 worth of airplane flights by the law firm was not reported to the Committee, the treasurer of the Committee or the State Board of Elections, and the defendant prepared documentation in October 2008 that concealed the true nature of the payments and purported that the payment of the flights had been contributed to the North Carolina Democratic Party when in fact the contributions were for the benefit of the Committee. This scheme prevented the State Board of Elections and the public from having information to which they were entitled by law to have. This was done in violation of the common law and against the peace and dignity of the State.

The State alleges the existence of the following statutory aggravating factors:
15A-1340.16 (d) (1), (2) and (5).

The State alleges the existence of the following non-statutory aggravating factors:
That the defendant is a lawyer and has been licensed to practice law in North Carolina for more than 15 years. (2) That the defendant has served as the treasurer of a political action committee for a candidate for statewide office in North Carolina and has filed campaign disclosure reports with the North Carolina Board of Elections.



Colon Willoughby
Prosecutor

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE # 11 CRS 13312

STATE OF NORTH CAROLINA

v.

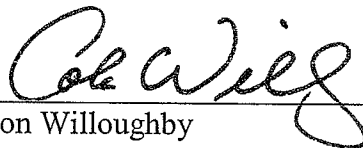
INDICTMENT – FALSE REPORTS

Julia Leigh Sitton

The jurors for the State upon their oath present that on or between January 1, 2007 and February 1, 2009 in Wake County the defendant named above unlawfully, willfully and feloniously did cause the Bev Perdue Committee (hereinafter the Committee), a candidate committee constituted under Article 22A of Chapter 163 of the North Carolina General Statutes, to certify as true and correct campaign reports required to be certified and filed with the North Carolina State Board of Elections, when the defendant knew the reports were not true and correct : to wit, the reports failed to include contributions and/or loans and expenditures by Charles Michael Fulenwider and Tryon Capital Ventures, LLC that were used to pay part of the defendant's salary while she worked for the Committee. This conduct was against the peace and dignity of the State and in violation of G.S. 163-278.9(5a), 163-278.9(g), 163-278.11(a)(1), 163-278.11(a)(3), 163-278.11(b), 163-278.27(a1), and 163-278.32.

The State alleges the existence of the following statutory aggravating factors 15A-1340.16(d)(1), (2) and (5).

The State alleges the existence of the following non-statutory aggravating factor:
(1) That the defendant is a lawyer and has been licensed to practice law in North Carolina for more than 15 years.



Colon Willoughby
Prosecutor

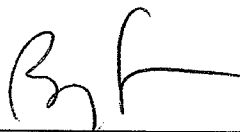
K. Perry, SBI

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:

A TRUE BILL by twelve or more grand jurors, and the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

NOT A TRUE BILL

NOV 28 2011
DATE


Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE # 11 CRS 13311

STATE OF NORTH CAROLINA

v.

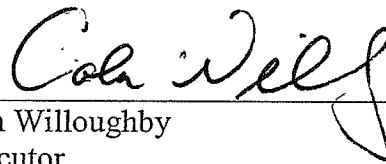
INDICTMENT – OBSTRUCTION OF JUSTICE

Julia Leigh Sitton

The jurors for the State upon their oath present that on or between June 1, 2007 and February 1, 2009 in Wake County the defendant named above unlawfully, willfully and feloniously did, in secret and with malice, and with deceit and intent to defraud obstruct public justice in her role as an employee of the Bev Perdue Committee (hereinafter the Committee) by working full time for the Committee for a period of 16 months and concealing from the public and the State Board of Elections the fact that she was being paid by sources other than the Committee. From August 2007 through November 2008 the defendant worked for the Committee in a full time capacity and was paid in part by the Committee at the rate of \$3,000 per month which was reported by the Committee as a campaign expenditure, during that same period of time the defendant was being paid an additional \$2,000 per month by Tryon Capital Ventures LLC (hereinafter Tryon) for a total of an additional \$32,000(16 months X \$2,000 = \$32,000) for working for the Committee that was not reported as a campaign expenditure. The \$32,000 paid to the defendant by Tryon was funded by Charles Michael Fulenwider who paid the money to Tryon disguised as consulting services when no such services were provided. The contributions and corresponding expenditures exceeded the maximum contributions allowed by law from a contributor, and they were not disclosed to the Committee or the treasurer of the Committee or the State Board of Elections preventing the State Board of Elections and the public from having information to which they were entitled by law to have. This was done in violation of the common law and against the peace and dignity of the State.

The State alleges the existence of the following statutory aggravating factors
15A-1340.16(d)(1), (2) and (5).

The State alleges the existence of the following non-statutory aggravating factor:
(1) That the defendant is a lawyer and has been licensed to practice law in North Carolina for more than 15 years.



Colon Willoughby
Prosecutor

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE # 11 CRS 13307

STATE OF NORTH CAROLINA

v.

INDICTMENT – OBSTRUCTION OF JUSTICE

Peter Anthony Reichard

The jurors for the State upon their oath present that on or between June 1, 2007 and February 1, 2009 in Wake County the defendant named above unlawfully, willfully and feloniously did, in secret and with malice, and with deceit and intent to defraud obstruct public justice in his role as an employee of and consultant to the Bev Perdue Committee (hereinafter the Committee) by soliciting and accepting over \$32,000 of campaign contributions and/or loans and expenditures for the Committee from Charles Michael Fulenwider (hereinafter Fulenwider) who had already contributed the maximum amount allowed by law in contributions (\$4,000 on December 3, 2005 and \$4,000 on May 28, 2008). The defendant did this through a scheme that allowed Fulenwider to make excessive contributions and/or loans and expenditures by paying \$32,000 to Tryon Capital Ventures LLC which was used to compensate Julia Leigh Sitton for work she did for the Committee without disclosing that compensation to the Committee, the treasurer of the Committee or the North Carolina Board of Elections. This scheme prevented the State Board of Elections and the public from having information to which they were entitled by law to have. This was done in violation of the common law and against the peace and dignity of the State.

The State alleges the existence of the following Statutory aggravating factors
15A-1340.16(d) (1), (2) and (5).



Colon Willoughby
Prosecutor

K. Perry, SBI

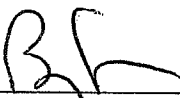
The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:

A TRUE BILL by twelve or more grand jurors, and the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

NOT A TRUE BILL

NOV 28 2011

DATE



Grand Jury Foreman