

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

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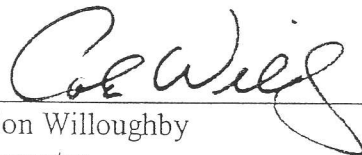
INDICTMENT – OBSTRUCTION OF JUSTICE

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

