

State Witness – Deputy Chief Investigator Clay Nix

No. \_\_\_\_\_  
DEKALB COUNTY SUPERIOR COURT

MAY TERM 2013

THE STATE

vs.

W. BURRELL ELLIS, JR.

#D0233613-1

- Ct. 1: Criminal Attempt to Commit Theft by Extortion
- Ct. 2: Criminal Attempt to Commit Theft by Extortion
- Ct. 3: Criminal Attempt to Commit Theft by Extortion
- Ct. 4: Criminal Attempt to Commit Theft by Extortion
- Ct. 5: Conspiracy in Restraint of Free and Open Competition
- Ct. 6: Criminal Attempt to Commit False Statements and Writings
- Ct. 7: Criminal Attempt to Commit False Statements and Writings
- Ct. 8: Theft by Taking
- Ct. 9: Theft by Taking
- Ct. 10: Conspiracy to Defraud a Political Subdivision
- Ct. 11: Coercion of Other Employee to Give Anything of Value for Political Purposes
- Ct. 12: Coercion of Other Employee to Give Anything of Value for Political Purposes
- Ct. 13: Conspiracy in Restraint of Free and Open Competition
- Ct. 14: Theft by Taking
- Ct. 15: Coercion of Other Employee to Give Anything of Value for Political Purposes

\_\_\_\_\_ Bill.

\_\_\_\_\_ Foreperson.

The Defendant, W. Burrell Ellis, Jr., waives copy of the Indictment, list of witnesses, full panel, formal arraignment, and pleads

\_\_\_\_\_.

This the \_\_\_\_ of \_\_\_\_\_ 20\_\_.

\_\_\_\_\_  
District Attorney

\_\_\_\_\_  
Defendant's Attorney

\_\_\_\_\_  
Defendant

STATE OF GEORGIA, COUNTY OF DEKALB

**BILL OF INDICTMENT**

IN THE SUPERIOR COURT OF SAID COUNTY,

The Grand Jurors selected, chosen and sworn for the County of DeKalb to wit:

1. Juan Hall, Foreperson
2. Lauren Akins
3. Thomas Annest
4. Toni M. F. Avery
5. James E. Batten
6. Robyn Bernstein
7. Jackson B. Brunson, Jr.
8. Diane K. Callaway
9. James B. Coaxum
10. Willie C. Cook
11. Richard Halpern
12. Andrea R. Hurtado
13. Delores Jones
14. Derome A. Jordan
15. Wilfred W. Kirk
16. Bernard L. Lewis
17. Ryan P. Marzzarella
18. John F. Phipps
19. Durwood T. Pye, III
20. John D. Ross
21. Christene R. Self
22. Quentin L. Solomon
23. Raymond M. Stephens
24. Juanita V. Webster
25. Jacqueline M. Wynter
26. Jamilla Yancey

**Count 1**

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **CRIMINAL ATTEMPT TO COMMIT THEFT BY EXTORTION** in violation of O.C.G.A. § 16-4-1, for the said accused person, in the County of DeKalb and State of Georgia, **on, about, and between the 17<sup>th</sup> day of February, 2012, and the 21<sup>st</sup> day of March, 2012, the exact date being unknown to the Grand Jurors**, did attempt to commit the crime of Theft by Extortion, in violation of O.C.G.A. § 16-8-16 (a) (4), in that the said accused did, as a public official, to wit: Chief Executive Officer of DeKalb County, Georgia, attempt to unlawfully obtain United States currency in the form of a campaign contribution, the property of CIBER, Inc. and Joanne Wise, an employee of CIBER, Inc., by threatening to take and withhold action as a public official, to wit: threatening to prevent CIBER, Inc. from receiving business from DeKalb County, Georgia, and did knowingly and intentionally perform an act, to wit: the said accused did threaten to end CIBER, Inc.'s business with DeKalb County, Georgia, after Joanne Wise did not respond to the said accused's campaign contribution solicitations and after she indicated that she and CIBER, Inc. would not contribute to his campaign, with the intent that said threat would cause CIBER, Inc. and Joanne Wise to contribute to his campaign, which constituted a substantial step toward the commission of said crime,

contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney

**Count 2**

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **CRIMINAL ATTEMPT TO COMMIT THEFT BY EXTORTION** in violation of O.C.G.A. § 16-4-1, for the said accused person, in the County of DeKalb and State of Georgia, **on, about, and between the 17<sup>th</sup> day of February, 2012, and the 21<sup>st</sup> day of March, 2012, the exact date being unknown to the Grand Jurors**, did attempt to commit the crime of Theft by Extortion, in violation of O.C.G.A. § 16-8-16 (a) (3), in that the said accused did attempt to unlawfully obtain United States currency in the form of a campaign contribution, the property of CIBER, Inc. and Joanne Wise, an employee of CIBER, Inc., by threatening to impair her business repute, to wit: the said accused did threaten to contact the Chief Executive Officer of CIBER, Inc., to tell him that Joanne Wise provided poor customer service and that her poor customer service is the reason that CIBER, Inc. would not be receiving any additional work from DeKalb County, Georgia, with the intent that said threat would cause CIBER, Inc. and Joanne Wise to contribute to his campaign, which constituted a substantial step toward the commission of said crime,

contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney

### Count 3

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **CRIMINAL ATTEMPT TO COMMIT THEFT BY EXTORTION** in violation of O.C.G.A. § 16-4-1, for the said accused person, in the County of DeKalb and State of Georgia, **on and about the 25<sup>th</sup> day of June, 2012**, did attempt to commit the crime of Theft by Extortion, in violation of O.C.G.A. § 16-8-16, in that the said accused did, as a public official, to wit: Chief Executive Officer of DeKalb County, Georgia, attempt to unlawfully obtain United States currency in the form of a campaign contribution, the property of Power and Energy Services, Inc., ("Power and Energy") by threatening to take and withhold action as a public official, to wit: causing Power and Energy not to receive business from DeKalb County, Georgia, and did knowingly and intentionally perform an act, to wit: the said accused did threaten to end Power and Energy's business with DeKalb County, Georgia, after Power and Energy and officers of said company, to wit: Brandon Cummings and Danice Cummings, did not respond to the said accused's campaign contribution solicitations and after Eneida Robles, an employee of Power and Energy, indicated that Power and Energy would not contribute to his campaign, with the intent that said threat would cause Power and Energy to contribute to his campaign, which constituted a substantial step toward the commission of said crime,

contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney

**Count 4**

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **CRIMINAL ATTEMPT TO COMMIT THEFT BY EXTORTION** in violation of O.C.G.A. § 16-4-1, for the said accused person, in the County of DeKalb and State of Georgia, **on and about the 27<sup>th</sup> day of September, 2012**, did attempt to commit the crime of Theft by Extortion, in violation of O.C.G.A. § 16-8-16, in that the said accused did, as a public official, to wit: Chief Executive Officer of DeKalb County, Georgia, attempt to unlawfully obtain United States currency in the form of a campaign contribution, the property of Power and Energy Services, Inc., (“Power and Energy”) by threatening to take and withhold action as a public official, to wit: causing Power and Energy not to receive business from DeKalb County, Georgia, and did knowingly and intentionally perform an act, to wit: the said accused did threaten to end Power and Energy’s business with DeKalb County, Georgia, after Brandon Cummings, an officer of Power and Energy, did not respond to the said accused’s campaign contribution solicitations and did not contribute to his campaign, with the intent that said threat would cause Power and Energy to contribute to his campaign, which constituted a substantial step toward the commission of said crime,

contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney

## Count 5

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **CONSPIRACY IN RESTRAINT OF FREE AND OPEN COMPETITION** in violation of O.C.G.A. § 16-10-22, for the said accused person, in the County of DeKalb and State of Georgia, **on, about, and between the 27<sup>th</sup> day of September, 2012, and the of 28<sup>th</sup> day of September, 2012**, did enter into a conspiracy with Kelvin Walton, an unindicted co-conspirator and the Director of Purchasing and Contracting for DeKalb County, Georgia, in unreasonable restraint of trade in a transaction, to wit: DeKalb County, Georgia Contract Purchase Agreement No. 850123-12 by and between Power and Energy Services, Inc. ("Power and Energy") and DeKalb County, Georgia, a political subdivision, said transaction being for goods, materials, and services, to wit: diesel engines, generators, and accessory equipment services, and in furtherance of said conspiracy the said accused did instruct Kelvin Walton to prevent Power and Energy from receiving additional work from DeKalb County, Georgia, under said contract because the said accused alleged Power and Energy did not respond to the said accused's campaign contribution solicitations and because Power and Energy did not give him a campaign contribution, to effect the object of the conspiracy,

contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney

**Count 6**

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **CRIMINAL ATTEMPT TO COMMIT FALSE STATEMENTS AND WRITINGS** in violation of O.C.G.A. § 16-4-1, for the said accused person, in the County of DeKalb and State of Georgia, **on and about the 28<sup>th</sup> day of September, 2012**, did attempt to commit the crime of False Statements and Writings in violation of O.C.G.A. § 16-10-20, in that the said accused did knowingly and willfully attempt to make, as a party to the crime, a false writing and document, to wit: a note in the file that DeKalb County, Georgia Purchasing and Contracting maintains on Power and Energy Services, Inc., ("Power and Energy") knowing the same to contain a false and fictitious entry, to wit: that Power and Energy does not return phone calls, in a matter within the jurisdiction of DeKalb County, Georgia government, said entry being false and fictitious in that Power and Energy did return the said accused's telephone calls, and the said accused did knowingly and intentionally perform an act, to wit: instructing Kelvin Walton, the Director of Purchasing and Contracting for DeKalb County, Georgia, to place a note in Power and Energy's file that they do not return phone calls, which constituted a substantial step toward the commission of said crime,

contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney



**Count 7**

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **CRIMINAL ATTEMPT TO COMMIT FALSE STATEMENTS AND WRITINGS** in violation of O.C.G.A. § 16-4-1, for the said accused person, in the County of DeKalb and State of Georgia, **on and about the 28<sup>th</sup> day of September, 2012**, did attempt to commit the crime of False Statements and Writings in violation of O.C.G.A. § 16-10-20, in that the said accused did knowingly and willfully attempt to make, as a party to the crime, a false writing and document, to wit: a note in the file that DeKalb County, Georgia Purchasing and Contracting maintains on Power and Energy Services, Inc., ("Power and Energy") knowing the same to contain a fraudulent entry, to wit: that Power and Energy does not return phone calls, in a matter within the jurisdiction of DeKalb County, Georgia government, said entry being fraudulent in that the telephone calls concerned the said accused's solicitation of campaign contributions when the note would make it appear that the telephone calls concerned Power and Energy's work for DeKalb County, Georgia, and the said accused did knowingly and intentionally perform an act, to wit: instructing Kelvin Walton, the Director of Purchasing and Contracting for DeKalb County, Georgia, to place a note in Power and Energy's file that they do not return phone calls, which constituted a substantial step toward the commission of said crime,

contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney

### Count 8

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **THEFT BY TAKING** in violation of O.C.G.A. § 16-8-2, for the said accused person, in the County of DeKalb and State of Georgia, **on, about, and between the 1<sup>st</sup> day of November, 2011, and the 30<sup>th</sup> day of November, 2012, the exact dates being unknown to the Grand Jurors**, and while as an officer of a government, to wit: Chief Executive Officer of DeKalb County, Georgia, in breach of his duties as such an officer, did order and procure Kelvin Walton, the Director of Purchasing and Contracting for DeKalb County, Georgia, during Kelvin Walton's normal working hours and while he was being paid by DeKalb County, Georgia, to use DeKalb County Board of Commissioners meeting agendas and DeKalb County Purchasing and Contracting information and data, to create lists of vendors that were awarded contracts from DeKalb County, Georgia, said lists including the vendors' contact information and their contract values, and said lists being created by DeKalb County Contract Assistants, to wit: Natascha Crenshaw, Imani Marley-Husbands, and Jackie Huff, during their normal working hours and while they were being paid by DeKalb County, Georgia, so that the said accused could use said vendor lists to solicit campaign contributions, and the said accused did thereby unlawfully take the services of Kelvin Walton, Natascha Crenshaw, Imani Marley-Husbands, and Jackie Huff, said services being property of value, the property of DeKalb County, Georgia, with the intention of depriving said owner of said property,

contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney

**Count 9**

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **THEFT BY TAKING** in violation of O.C.G.A. § 16-8-2, for the said accused person, in the County of DeKalb and State of Georgia, **on, about, and between the 1<sup>st</sup> day of November, 2011, and the 30<sup>th</sup> day of November, 2012, the exact dates being unknown to the Grand Jurors**, and while as an officer of a government, to wit: Chief Executive Officer of DeKalb County, Georgia, in breach of his duties as such an officer, did order and procure Kelvin Walton, the Director of Purchasing and Contracting for DeKalb County, Georgia, during Kelvin Walton's normal working hours and while he was being paid by DeKalb County, Georgia, to personally deliver lists of vendors that were awarded contracts from DeKalb County, Georgia, to the said accused at the offices of R.L. Brown Associates, Inc., which was not a DeKalb County, Georgia facility, where the said accused was making campaign solicitation telephone calls, so that the said accused could use said vendor lists to solicit campaign contributions, and the said accused did thereby unlawfully take the services of Kelvin Walton, said services being property of value, the property of DeKalb County, Georgia, with the intention of depriving said owner of said property,

contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney

### Count 10

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **CONSPIRACY TO DEFRAUD A POLITICAL SUBDIVISION** in violation of O.C.G.A. § 16-10-21, for the said accused person, in the County of DeKalb and State of Georgia, **on, about, and between the 1<sup>st</sup> day of November, 2011, and the 30<sup>th</sup> day of November, 2012, the exact dates being unknown to the Grand Jurors**, did enter into a conspiracy with Kelvin Walton, an unindicted co-conspirator and the Director of Purchasing and Contracting for DeKalb County, Georgia, to commit theft of property, to wit: the services of Kelvin Walton, Natascha Crenshaw, Imani Marley-Husbands, and Jackie Huff, said services being the property of DeKalb County, Georgia, a political subdivision, with the intention of depriving said owner of said property, and in furtherance of said conspiracy the said accused did:

- 1) Instruct Kelvin Walton, during Kelvin Walton's normal working hours and while he was being paid by DeKalb County, Georgia, to use to use DeKalb County Board of Commissioners meeting agendas and DeKalb County Purchasing and Contracting information and data to create lists of vendors that were awarded contracts from DeKalb County, Georgia, so that the said accused could use said vendor lists to solicit campaign contributions; and
- 2) Order and procure DeKalb County Contract Assistants, to wit: Natascha Crenshaw, Imani Marley-Husbands, and Jackie Huff, during their normal working hours and while they were being paid by DeKalb County, Georgia, to use DeKalb County Board of Commissioners meeting agendas and DeKalb County Purchasing and Contracting information, to create lists of vendors that were awarded contracts from DeKalb County, Georgia, the said lists including the vendors' contact information and their contract values, so that the said accused could use said vendor lists to solicit campaign contributions; and
- 3) Instruct Kelvin Walton, during his normal working hours and while he was being paid by DeKalb County, Georgia, to personally deliver said vendor lists to the said accused at the offices of R.L. Brown Associates, Inc., which was not a DeKalb County, Georgia facility, where the said accused was making campaign solicitation telephone calls, so that the said accused could use said vendor lists to solicit campaign contributions,

to effect the object of the conspiracy, contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney

**Count 11**

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **COERCION OF OTHER EMPLOYEE TO GIVE ANYTHING OF VALUE FOR POLITICAL PURPOSES** in violation of O.C.G.A. § 45-11-10, for the said accused person, in the County of DeKalb and State of Georgia, **on, about, and between the 1<sup>st</sup> day of November, 2011, and the 30<sup>th</sup> day of November, 2012, the exact dates being unknown to the Grand Jurors**, and while as an officer of a county, to wit: Chief Executive Officer of DeKalb County, Georgia, did command directly and indirectly another employee of such political subdivision, to wit: Kelvin Walton, the Director of Purchasing and Contracting for DeKalb County, Georgia, to contribute a thing of value, to wit: his services, to a person, to wit: W. Burrell Ellis, Jr., for political purposes, to wit: the said accused did order and procure Kelvin Walton, during Kelvin Walton's normal working hours and while he was being paid by DeKalb County, Georgia, to use DeKalb County Board of Commissioners meeting agendas and DeKalb County Purchasing and Contracting information and data, to create lists of vendors that were awarded contracts from DeKalb County, Georgia, the said lists including the vendors' contact information and their contract values, and deliver the said lists to the said accused, so that the said accused could use said vendor lists to solicit campaign contributions,

contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney

## Count 12

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **COERCION OF OTHER EMPLOYEE TO GIVE ANYTHING OF VALUE FOR POLITICAL PURPOSES** in violation of O.C.G.A. § 45-11-10, for the said accused person, in the County of DeKalb and State of Georgia, **on, about, and between the 1<sup>st</sup> day of November 2011, and the 30<sup>th</sup> day of November, 2012, the exact dates being unknown to the Grand Jurors**, and while as an officer of a county, to wit: Chief Executive Officer of DeKalb County, Georgia, did command indirectly other employees of such political subdivision, to wit: Imani Marley-Husbands, a DeKalb County Contract Assistant, Natascha Crenshaw, a DeKalb County Contract Assistant, and Jackie Huff, a DeKalb County Contract Assistant, to contribute a thing of value, to wit: their services, to a person, to wit: W. Burrell Ellis, Jr., for political purposes, to wit: the said accused did order and procure Kelvin Walton to use DeKalb County Board of Commissioners meeting agendas and DeKalb County Purchasing and Contracting information and data, to create lists of vendors that were awarded contracts from DeKalb County, Georgia, said lists including the vendors' contact information and their contract values, so that the said accused could use said vendor lists to solicit campaign contributions, and Kelvin Walton did order and procure Imani Marley-Husbands, Natascha Crenshaw, and Jackie Huff, during their normal working hours and while they were being paid by DeKalb County to create these lists of vendors, and the said accused did thereby unlawfully command indirectly Imani Marley-Husbands, Natascha Crenshaw, and Jackie Huff, to contribute their services,

contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney

**Count 13**

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **CONSPIRACY IN RESTRAINT OF FREE AND OPEN COMPETITION** in violation of O.C.G.A. § 16-10-22, for the said accused person, in the County of DeKalb and State of Georgia, **on and about the 1<sup>st</sup> day of October, 2012**, did enter into a conspiracy with Kelvin Walton, an unindicted co-conspirator and the Director of Purchasing and Contracting for DeKalb County, Georgia, in unreasonable restraint of trade in a transaction, to wit: DeKalb County Contract 12-902440 by and between National Property Institute, LLC ("NPI") and DeKalb County, Georgia, a political subdivision, said transaction being for goods, materials, and services, to wit: purchasing foreclosed homes to rehabilitate and resell them, and in furtherance of said conspiracy did instruct Kelvin Walton to prevent NPI from receiving work from DeKalb County under said contract because the said accused alleged NPI did not respond to the said accused's campaign contribution solicitations and because NPI did not give him a campaign contribution, to effect the object of the conspiracy,

contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney

**Count 14**

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **THEFT BY TAKING** in violation of O.C.G.A. § 16-8-2, for the said accused person, in the County of DeKalb and State of Georgia, **on, about, and between the 28<sup>th</sup> day of September, 2012, and the 1<sup>st</sup> day of October, 2012**, while as an officer of a government, to wit: Chief Executive Officer of DeKalb County, Georgia, in breach of his duties as such an officer, did order and procure Chris Morris, the Director of the DeKalb County Community Development Department, during her normal working hours and while she was being paid by DeKalb County, to arrange for a meeting between the accused and National Property Institute, LLC ("NPI") and the said accused did order and procure Chris Morris, during her normal working hours and while she was being paid by DeKalb County, Georgia, to attend a meeting with NPI held because the said accused alleged that NPI and Trina Shealey, Vice President of NPI, did not respond to the said accused's campaign contribution solicitations, and did thereby unlawfully take the services of Chris Morris, property of value, the property of DeKalb County, Georgia, with the intention of depriving said owner of said property,

contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney



**Count 15**

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

**W. BURRELL ELLIS, JR.**

with the offense of **COERCION OF OTHER EMPLOYEE TO GIVE ANYTHING OF VALUE FOR POLITICAL PURPOSES** in violation of O.C.G.A. § 45-11-10, for the said accused person, in the County of DeKalb and State of Georgia, **on, about, and between the 28<sup>th</sup> day of September, 2012, and the 1<sup>st</sup> day of October, 2012**, and while as an officer of a county, to wit: Chief Executive Officer of DeKalb County, Georgia, did command directly and indirectly another employee of such political subdivision, to wit: Chris Morris, the Director of the DeKalb County Community Development Department, to contribute a thing of value, to wit: her services, to a person, to wit: W. Burrell Ellis, Jr., for political purposes, to wit: the said accused did directly and indirectly command Chris Morris, during her normal working hours and while she was being paid by DeKalb County, Georgia, to arrange a meeting between the accused and National Property Institute, LLC ("NPI") and the said accused did directly command Chris Morris, during her normal working hours and while she was being paid by DeKalb County, Georgia to attend a meeting with NPI held because the said accused alleged that NPI and Trina Shealey, Vice President of NPI, did not respond to the said accused's telephone campaign contribution solicitations,

contrary to the laws of said State, the good order, peace, and dignity thereof.

DEKALB SUPERIOR COURT

ROBERT D. JAMES, District Attorney