

IN THE DISTRICT COURT OF TRAVIS COUNTY, TEXAS
403RD JUDICIAL DISTRICT

THE STATE OF TEXAS

VS.

WESTAR ENERGY, INC.

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CRIMINAL ACTION NO. 9-04-0579



BILL OF INDICTMENT

DA #9-04-0579/PID # _____ /MNI #1221762/TCDA-SPD #4403-03

331ST

CHARGE: UNLAWFUL POLITICAL CONTRIBUTION BY CORPORATION
TEXAS ELECTION CODE § 253.094 (3RD DEGREE FELONY)

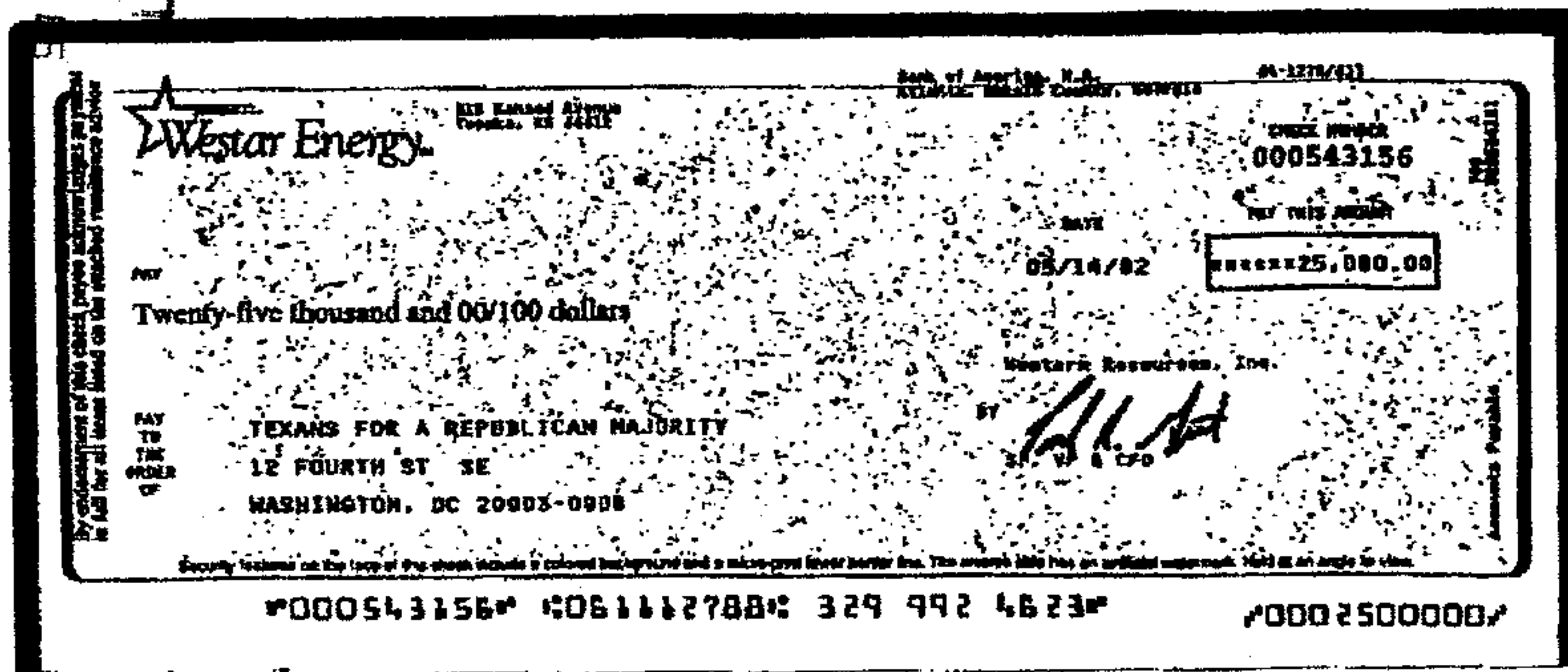
BAIL: \$ _____

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

THE GRAND JURY OF THE COUNTY OF TRAVIS, STATE OF TEXAS, duly selected, organized, sworn, and charged as such at the April term, A.D., 2004, of the 403rd Judicial District Court of said county, in said court at said term, upon their oaths do present that on or about the fourteenth day of May, A.D., 2002,

WESTAR ENERGY, INC.,

the defendant herein, a corporation that was not a Texas resident, did make a political contribution of \$25,000 that was not authorized by Subchapter D of Chapter 253 of the Election Code to Texans for a Republican Majority PAC, a general-purpose political committee, and the defendant made the said contribution by issuing the check reproduced below:



AGAINST THE PEACE AND DIGNITY OF THE STATE.

Dorothy Madison

Foreperson of the Grand Jury

IN THE DISTRICT COURT OF TRAVIS COUNTY, TEXAS
403RD JUDICIAL DISTRICT

THE STATE OF TEXAS

VS.

JOHN DOMINICK COLYANDRO

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CRIMINAL ACTION NO. 9-04-0576



BILL OF INDICTMENT

DA #9-04-0576/PID # _____ /MNI #1221697/TCDA-SPD #4403-03 331ST
CHARGE: UNLAWFUL ACCEPTANCE OF CORPORATE POLITICAL CONTRIBUTION
TEXAS ELECTION CODE § 253.003 (3RD DEGREE FELONY)
BAIL: \$ _____

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

THE GRAND JURY OF THE COUNTY OF TRAVIS, STATE OF TEXAS, duly selected, organized, sworn, and charged as such at the April term, A.D., 2004, of the 403rd Judicial District Court of said county, in said court at said term, upon their oaths do present that on or about the twenty-eighth day of May, A.D., 2002,

JOHN DOMINICK COLYANDRO,

the defendant herein, whose residence was situated in the County of Travis and State of Texas, did knowingly accept a political contribution of \$25,000 that was made by Westar Energy, Inc., a corporation, to Texans for a Republican Majority PAC, a general-purpose political committee, that the defendant knew to have been made in violation of Chapter 253 of the Election Code, and that, having been made by a corporation and not having been authorized by Subchapter D of Chapter 253 of the Election Code, was made in violation of Subchapter D of Chapter 253 of the Election Code,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Dorothy Madison
Foreperson of the Grand Jury

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DISTRICT CLERK
TRAVIS COUNTY, TEXAS

IN THE DISTRICT COURT OF TRAVIS COUNTY, TEXAS
403RD JUDICIAL DISTRICT

THE STATE OF TEXAS

vs.

WARREN M. ROBOLD

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CRIMINAL ACTION NO. 9-02-0591



BILL OF INDICTMENT

DA #9-02-0591/PID # _____/MNI #1221772/TCDA-SPD #4403-03 331ST
COUNT I: UNLAWFUL POLITICAL CONTRIBUTION BY CORPORATION
TEXAS ELECTION CODE § 253.094 (3RD DEGREE FELONY)
COUNT II: UNLAWFUL ACCEPTANCE OF CORPORATE POLITICAL CONTRIBUTION
TEXAS ELECTION CODE § 253.003 (3RD DEGREE FELONY)
BAIL: \$ _____

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

[COUNT I]

THE GRAND JURY OF THE COUNTY OF TRAVIS, STATE OF TEXAS, duly selected, organized, sworn, and charged as such at the April term, A.D., 2004, of the 403rd Judicial District Court of said county, in said court at said term, upon their oaths do present that on or about the twenty-eighth day of January, A.D., 2002, El Paso Energy Service Company, a corporation, did make a political contribution of \$50,000 that was not authorized by Subchapter D of Chapter 253 of the Election Code to Texans for a Republican Majority PAC, a general-purpose political committee, and that

WARREN M. ROBOLD,

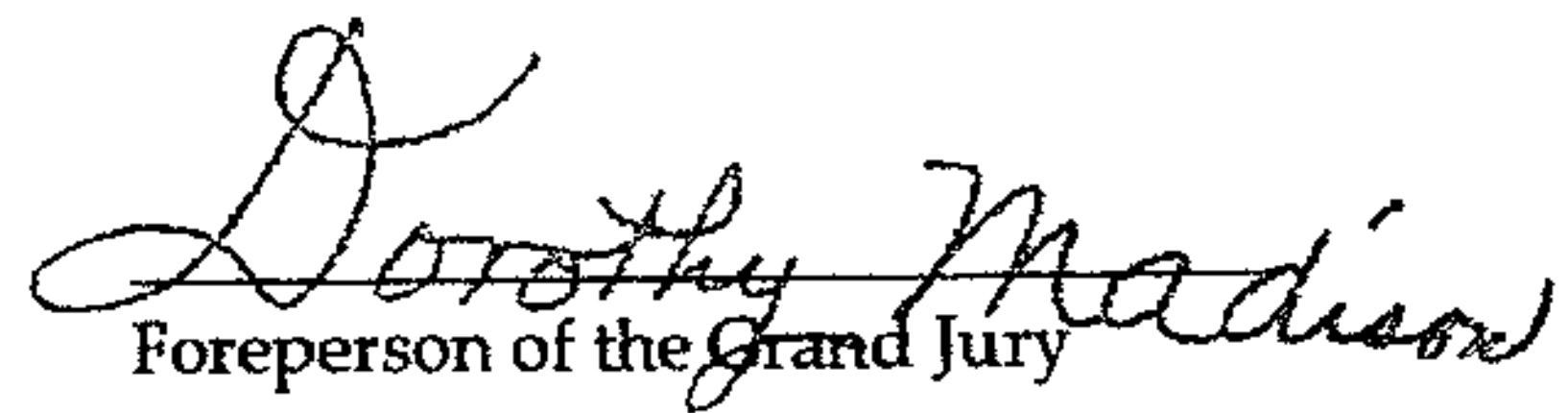
the defendant herein, who was not a Texas resident, did, with intent to promote and assist the commission of the said offense, solicit, encourage, direct, and aid the said corporation to commit the said offense

[COUNT II]

THE GRAND JURY FURTHER PRESENT THAT on or about the twenty-eighth day of January, A.D., 2002, the defendant, WARREN M. ROBOLD, who was not a Texas resident, did knowingly accept a political contribution of \$50,000 that was made by El Paso Energy Service Company, a corporation, to Texans for a

TRAVIS COUNTY, TEXAS
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Republican Majority PAC, a general-purpose political committee, that the defendant knew to have been made in violation of Chapter 253 of the Election Code, and that, having been made by a corporation and not having been authorized by Subchapter D of Chapter 253 of the Election Code, was made in violation of Subchapter D of Chapter 253 of the Election Code,
AGAINST THE PEACE AND DIGNITY OF THE STATE.


Foreperson of the Grand Jury

IN THE DISTRICT COURT OF TRAVIS COUNTY, TEXAS
403RD JUDICIAL DISTRICT

THE STATE OF TEXAS

VS.

JAMES W. ELLIS

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CRIMINAL ACTION NO. 9-04-0564



BILL OF INDICTMENT

DA #9-04-0564/PID # _____ /MNI #1221680/TCDA-SPD #4403-03 331ST
CHARGE: MONEY LAUNDERING
TEXAS PENAL CODE § 34.02 (1ST DEGREE FELONY)
BAIL: \$ _____

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

THE GRAND JURY OF THE COUNTY OF TRAVIS, STATE OF TEXAS, duly selected, organized, sworn, and charged as such at the April term, A.D., 2004, of the 403rd Judicial District Court of said county, in said court at said term, upon their oaths do present that on or about the thirteenth day of September, A.D., 2002, in the County of Travis and State of Texas,

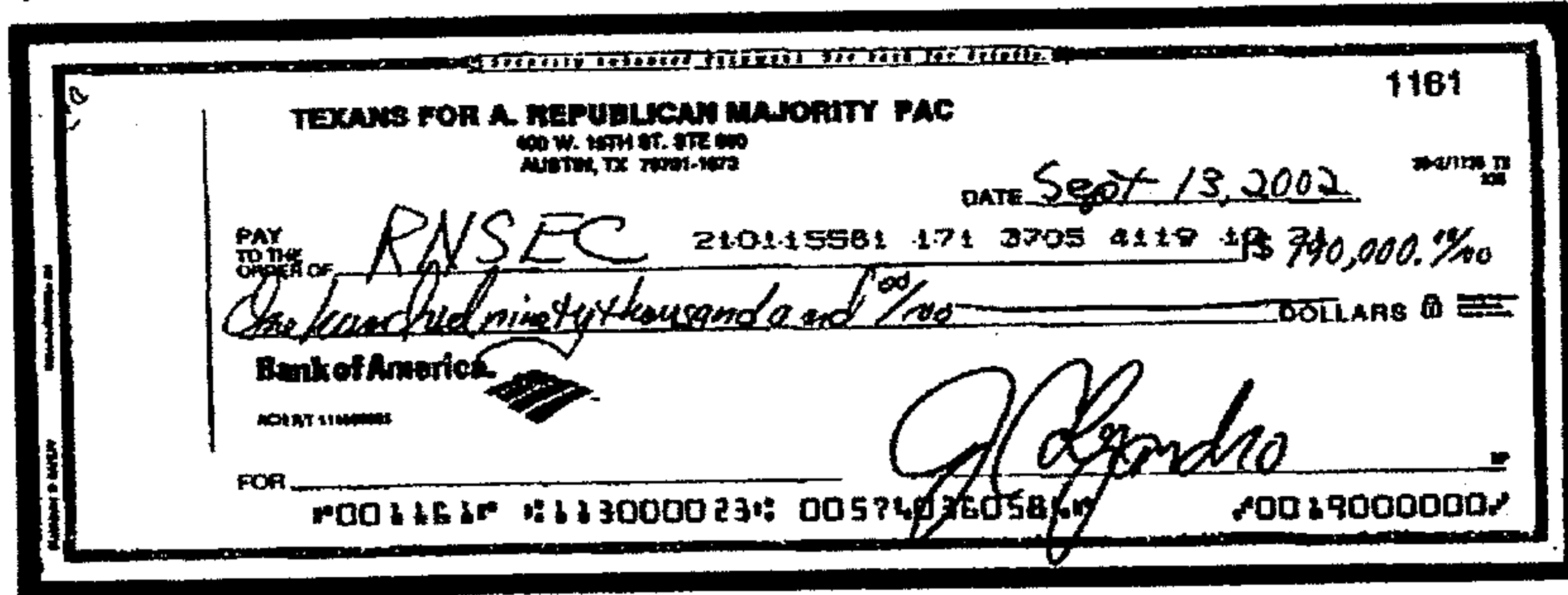
JAMES W. ELLIS,

the defendant herein, did knowingly conduct and facilitate a transaction involving the proceeds of criminal activity that constituted violations of section 253.094 of the Election Code, entitled "Contributions and Expenditures Prohibited," offenses classified as felonies under the laws of this state, and the value of the funds that constituted the aforesaid proceeds of criminal activity was \$100,000 or more.

THE GRAND JURY FURTHER PRESENT THAT the following acts constituted the aforesaid transaction: on or about the aforesaid date, the defendant, JAMES W. ELLIS, delivered the check reproduced below to the Republican National Committee; on or about the aforesaid date, the defendant, JAMES W. ELLIS, provided the Republican National Committee with a list containing the names of several candidates to whom he suggested that the Republican National Committee make political contributions and containing corresponding dollar amounts that he suggested that the Republican National Committee contribute to each candidate; as a result of the Republican National Committee's receipt and acceptance of the said check and the said list, the Republican National State Elections Committee, the nonfederal component of

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TRAVIS COUNTY, TEXAS

the Republican National Committee, made campaign contributions totaling \$190,000 to the following candidates for the Texas House of Representatives: Todd Baxter, Dwayne Bohac, Glenda Dawson, Dan Flynn, Rick Green, Jack Stick, and Larry Taylor.



THE GRAND JURY FURTHER PRESENT that the aforesaid transaction involved the following funds that constituted proceeds of criminal activity: \$50,000 that constituted the proceeds of a political contribution that was unlawfully made to Texans for a Republican Majority PAC by Diversified Collection Services, Inc.; \$25,000 that constituted the proceeds of a political contribution that was unlawfully made to Texans for a Republican Majority PAC by Sears, Roebuck and Co.; \$25,000 that constituted the proceeds of a political contribution that was unlawfully made to Texans for a Republican Majority PAC by the Williams Companies, Inc.; \$10,000 that constituted the proceeds of a political contribution that was unlawfully made to Texans for a Republican Majority PAC by Cornell Companies, Inc.; \$20,000 that constituted the proceeds of a political contribution that was unlawfully made to Texans for a Republican Majority PAC by Bacardi U.S.A., Inc.; and \$25,000 that constituted the proceeds of a political contribution that was unlawfully made to Texans for a Republican Majority PAC by Questerra Corporation,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Dorothy Madison

Foreperson of the Grand Jury