

IN THE DISTRICT COURT OF TRAVIS COUNTY, TEXAS
147TH JUDICIAL DISTRICT

THE STATE OF TEXAS

§

§

vs.

§

CRIMINAL ACTION NO. D1DC-05-900669

§

TEXANS FOR A REPUBLICAN MAJORITY
PAC

§

§



BILL OF INDICTMENT

DA #D1DC-05-900669/MNI #1324523/TCDA-SPD #4403-03

331ST

COUNTS 1 & 2: UNLAWFUL ACCEPTANCE OF CORPORATE POLITICAL CONTRIBUTION

TEXAS ELECTION CODE § 253.003

(3RD DEGREE FELONIES)

BAIL: \$ _____

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

{COUNT 1}

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., 2005, of the 147th Judicial District Court of said county, in said court at said term, upon their oaths do present that on or about the twenty-fourth day of October, A.D., 2002, in the County of Travis and State of Texas,

TEXANS FOR A REPUBLICAN MAJORITY PAC,

the defendant herein, a general-purpose committee and association whose residence was situated in the County of Travis and State of Texas, did knowingly accept a political contribution that the defendant knew to have been made in violation of Chapter 253 of the Election Code, to wit, a political contribution of \$100,000 that was made by a corporation, namely, Alliance for Quality Nursing Home Care Inc., which contribution,

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.

THE GRAND JURY FURTHER PRESENT THAT the aforesaid conduct was authorized, requested, commanded, performed, and recklessly tolerated by a high managerial agent, to wit: John Colyandro, acting in behalf of said association and within the scope of his office and employment.

{COUNT 2}

THE GRAND JURY FURTHER PRESENT THAT on or about the eighteenth day of November, A.D., 2002, in the County of Travis and State of Texas, the defendant, TEXANS FOR A REPUBLICAN MAJORITY PAC, a general-purpose committee and association whose residence was situated in the County of Travis and State of Texas, did knowingly accept a political contribution that the defendant knew to have been made in violation of Chapter 253 of the Election Code, to wit, a political contribution of \$20,000 that was made by a corporation, namely, AT&T Corp., which contribution, 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.

THE GRAND JURY FURTHER PRESENT THAT the aforesaid conduct was authorized, requested, commanded, performed, and recklessly tolerated by a high managerial agent, to wit: John Colyandro, acting in behalf of said association and within the scope of his office and employment,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Foreperson of the Grand Jury