

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

THE STATE OF TEXAS	§
vs.	§
JOHN DOMINICK COLYANDRO,	§ CRIMINAL ACTION No. _____
JAMES WALTER ELLIS, &	§ CRIMINAL ACTION No. _____
THOMAS DALE DELAY	§ CRIMINAL ACTION No. _____



BILL OF INDICTMENT

JOHN DOMINICK COLYANDRO	TRIAL COURT: 331ST
RE-INDICTMENT OF CRIMINAL ACTION No. D1DC-05-904150	
PID #730883/MNI #1221697/TCDA-SPD #4403-03	BAIL: \$
JAMES WALTER ELLIS	TRIAL COURT: 331ST
RE-INDICTMENT OF CRIMINAL ACTION No. D1DC-05-904151	
PID #730881/MNI #1221680/TCDA-SPD #4403-03	BAIL: \$
THOMAS DALE DELAY	TRIAL COURT: 331ST
DA #D1DC-05900725	
PID # /MNI # /TCDA-SPD #4403-03	BAIL: \$
CRIMINAL CONSPIRACY	
TEXAS PENAL CODE § 15.02 (STATE JAIL FELONIES)	

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., 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 thirteenth day of September, A.D., 2002, in the County of Travis and State of Texas,

JOHN DOMINICK COLYANDRO,
JAMES WALTER ELLIS, AND
THOMAS DALE DELAY,

the defendants herein, with the intent that a felony be committed, did enter into an agreement with one or more of each other or with a general purpose political committee known as Texans for a Republican Majority PAC that one or more of them would engage in conduct that would constitute the offense of knowingly

making a political contribution in violation of Subchapter D of Chapter 253 of the Texas Election Code, a violation of Sections 253.003 and 253.094 and 253.104 of the Election Code, in that said contribution was made directly to the Republican National Committee, a political party, during a period beginning sixty days before the date of a general election for state and county officers and continuing through the date of the election, and indirectly to candidates for the Texas House of Representatives, and that said contribution included a prohibited political contribution by a corporation; and that John Dominick Colyandro, and James Walter Ellis, and Texans for a Republican Majority PAC did perform overt acts in pursuance of the agreement, to wit: John Colyandro and Texans for a Republican Majority PAC did accept contributions from corporations, namely Diversified Collection Services, Inc. in the amount of \$50,000, and Sears, Roebuck and Co. in the amount of \$25,000, and Williams Companies, Inc. in the amount of \$25,000, and Cornell Companies, Inc. in the amount of \$10,000, and Bacardi U.S.A., Inc. in the amount of \$20,000, and Questerra Corporation in the amount of \$25,000; and James Ellis and Texans for a Republican Majority PAC did tender, deliver, and cause to be tendered and delivered to the Republican National Committee and Terry Nelson, a representative of the Republican National Committee, a check (a copy of which is hereinafter reproduced) payable to RNSEC (the Republican National State Elections Committee, a nonfederal component of the Republican National Committee) in the amount of \$190,000, said check being from the same bank account into which the above-described corporate contributions had been deposited; and James Ellis and Texans for a Republican Majority PAC did provide the said Terry Nelson with a document that contained the names of candidates for the Texas House of Representatives and amounts to be contributed to each of the said candidates, namely, Todd Baxter, Dwayne Bohac, Glenda Dawson, Dan Flynn, Rick Green, Jack Stick, and Larry Taylor; and James Ellis and Texans for a Republican Majority PAC requested, solicited, and proposed that the Republican National Committee and the Republican National State Elections Committee make political contributions to said candidates after the aforesaid check was delivered to Terry Nelson; and John Colyandro did sign the aforesaid check; and John Colyandro did deliver the aforesaid check, and did cause the aforesaid check to be delivered to James Ellis by instructing Russell

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Foreperson of the Grand Jury