

ORCHARD PARK COURT : COUNTY OF ERIE

THE PEOPLE OF THE STATE OF NEW YORK

MISDEMEANOR COMPLAINT

vs.

FRIENDS OF TERRY YARNALL

Defendant

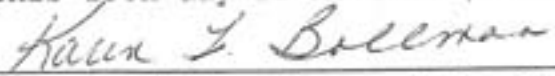
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I, Assistant District Attorney DAVID S. KELLY, the complainant herein, charge that FRIENDS OF TERRY YARNALL, the defendant, did commit the crime of knowingly and willfully violating a provision of Article 14 of the New York State Election Law contrary to the provisions of §14-126(2) of the New York State Election Law, an unclassified misdemeanor, in that, based upon information and belief, the said FRIENDS OF TERRY YARNALL, an unincorporated association within the meaning of Penal Law §10.00(7), specifically failed to give to the treasurer of FRIENDS OF TERRY YARNALL, as required by §14-122(1) of the New York State Election Law, a detailed account of expenditures with vouchers pertaining to the cost of producing and mailing the attached four political mailings sent out under the name of "OBSERVERS OF WILLINK" which costs exceeded fifty dollars (\$50.00) and further, intentionally failed to include those costs in a required State of New York Board of Elections Financial Disclosure Statement submitted by FRIENDS OF TERRY YARNALL on or about December 1, 2003, to the Erie County Board of Elections.



DAVID S. KELLY
Assistant District Attorney

Subscribed and sworn to before me
this 13th day of November, 2006.



Notary Public, State of New York
Qualified in Erie County
My commission expires on 2/07/10.