

PERCIPIENT STRATEGIES RESEARCH DOSSIER

MARY WOODSON GARDNER
BRADLEY

(NORTH CAROLINA STATE SENATE: SD-42)

Last Updated: April 12, 2024

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EXECUTIVE SYNOPSIS

DOSSIER NOTES

In preparing this background report, we undertook an examination of all readily available and relevant electronic and online records, several hundred Nexis and news articles, dozens of active and archived web pages, and several dozen public records from Nexis and the resources of various federal, state, and municipal government offices. The results of our analysis are contained below.

Typographical Note: There are a number of articles quoted in this report that contain typographical errors. These are from the original text of the article and have not been corrected when being quoted directly.

TOP HITS

Police & Criminal

Sex Offenses With A Child (Ex-Husband)

- Bradley's ex-husband, Gene Clayton Hair II, is a convicted sex offender registered with the Florida Department of Law Enforcement for two cases of indecent liberties with a child in Cabarrus County, North Carolina
 - Per conversation with the Cabarrus County Clerk of Court, Hair committed his first offense on June 1, 1998, and his second offense on June 1, 2001. Hair pled guilty to both charges of indecent liberties with a child.
 - Bradley and Hair were married on November 5, 2005, and were later divorced on July 20, 2018, according to the Cabarrus County Clerk of Court.

Alleged Sexual Offense Of A Juvenile Claims (Ex-Husband)

- In July 2019, the Cabarrus County Sheriff's Office received a report from a social worker employed by the Mecklenburg County Department of Social Services regarding allegations a child had been "assaulted, abused and/or neglected" at a residential property address previously owned by Bradley and her ex-husband, Gene Hair II, who was listed as a suspect in the initial report.
 - In August 2019, the case status was listed as "unfounded."

Alleged Forgery Claims

- In January 2019, the Cabarrus County Sheriff's Office received a call regarding Bradley's ex-husband, Gene Clayton Hair II, alleging he was the victim of fraud and claiming, "someone had forged his name on some tax documents."
 - Bradley was listed as a suspect in the report.

- In February 2019, the case status was listed as “exceptionally cleared” with a case disposition stating the “victim refused to” with no additional details listed.
- Previously in July 2018, Clay Hair (likely referring to Gene Clayton Hair II) filed a complaint with the North Carolina Real Estate Commission alleging Bradley “used documents that have been overlaid altered and forged to obtain loans and or moneys.”

Financial

Bankruptcies

- In December 2013, Bradley, then-Gardner-Hair, and her ex-husband Gene Hair petitioned for bankruptcy.
 - In July 2015, Bradley and Hair’s petition was granted and their debts were discharged.

Tax Liens

- Bradley has been issued at least one federal tax lien and at least one local homeowner’s association lien, totaling \$46,963.27.
 - Both liens have since been satisfied.

Alleged Eviction

- Per conversation with the Cabarrus County Clerk of Court, Bradley has at least one evictions complaint filed against her in Cabarrus County, North Carolina.

Professional And Personal Scandals

Hypocrisy

- Bradley has made claims she has spent her entire life dedicated to public service:
 - On her campaign site, Bradley claims her “entire life has been dedicated to public service, volunteerism, advocacy, and being a community leader”.
 - “Woodson has dedicated her life to public and community service”.

FHTM

- Bradley served in a prominent role in a pyramid scheme for an organization known as FHTM:
 - Bradley was extensively involved with FHTM and touted her roles as “one of FHTM’s top 11 earners, a member of the organization’s ring of honor, and a platinum sales manager”; Bradley also brought “her expertise to bear on FHTM’s independent representative training program as a National Trainer, in which role

she equips individuals with the resources and guidance necessary to make their businesses more profitable”.

- Video: in 2012, Bradley produced a promotional video for FHTM Canada and introduced herself noting “Hey everybody! I’m Woodson Gardner. National Sales Manager but also National Trainer”.
 - Video: In 2017, Bradley posted a video noting her presentation at the 2012 Vision Canada event; Bradley is noted as the “National Sales Manager” of FHTM; Bradley used her speech to note the alleged personal financial benefits of FHTM.
 - Video: Bradley posted a personal video touting FHTM and denying accusations that the company was a scam directly declaring “We’re not a scam. We’re not a scheme or anything of the sort”
 - Video: Bradley posted a personal video of herself noting her involvement in and promotion of FHTM as a means of personal financial independence.
 - Video: in 2012, FHTM released a video commemorating Bradley’s induction into the company’s ring of honor; Bradley touted her experiences with the company.
- In 2010, Montana regulators filed legal action against FHTM accusing the company of being a “pyramid scheme” after having previously fined the company \$1 million over its business practices.
 - In 2013, “The FTC and the states charged the Fortune Hi-Tech Marketing (FHTM) defendants with deceiving consumers by claiming they would earn significant income through selling various products and services if they signed up as FHTM representatives”.
 - Note 1: The FTC’s 2013 legal filing against FHTM directly cited Gardner’s advertising practices regarding recruitment bonuses as an example of deceptive practices by the company.
 - Note 2: The FTC’s 2013 legal filing against FHTM directly cited Gardner’s advertising practices regarding compensation amounts as an example of deceptive practices by the company.
 - Note 3: The FTC’s 2013 legal filing against FHTM directly cited Gardner’s claims regarding purchasing bundles for representatives as an example of deceptive practices by the company.
 - “In addition to charging the defendants with operating an illegal pyramid scheme and making false earnings claims, the FTC charged them with

furnishing consumers with false and misleading materials for recruiting more participants”.

- In 2013, Kentucky Attorney General Jack Conway described FHTM as “one of the most prolific pyramid schemes operating in North America”.
- Ironically, in 2013, then-Democratic North Carolina Attorney General Roy Cooper claimed credit for helping take down FHTM:
 - “Cooper’s consumer protection division received 37 written complaints and inquiries about FHTM starting in 2008, and opened its investigation into the company in 2010”.
 - Note: In 2024, Bradley has posted meeting with Cooper noting “Gov Cooper gave a strategic plan for NC at an event in Charlotte and I was able to meet him in person for the first time”.
- In 2014, the FTC banned FHTM for being a pyramid scheme that “enrolled more than 350,000 consumers throughout the United States, Puerto Rico and Canada”; the order also “requires the operators to surrender assets totaling at least \$7.75 million, which will be returned to consumers”.
- In 2016, the FTC mailed “285,361 checks totaling more than \$3.7 million to people who lost money to fortune hi-tech marketing (FHTM), a pyramid scheme whose operators were banned from multi-level marketing under a settlement with the FTC and the states of Illinois, Kentucky and North Carolina”.

Ariix

- Bradley served in a prominent role in a pyramid scheme for an organization known as Ariix:
 - Video: in 2015, Bradley posted a video promoting MLM company Ariix.
 - Video: in 2015, Bradley posted a video promoting Ariix’s Slenderiiz product.
 - In 2014, UK regulators under the advertising standards authority criticized Slenderiiz for making unfounded claims regarding its efficacy and prohibited the company from making such claims moving forward.
 - “Forever Living is one of a number of multi-level marketing (MLM) companies facing criticism from some women who feel they have been exploited. Others include Arbonne, Ariix, even The Body Shop”.
 - Ariix has been described by at least one former representative as “a cult” in which she was lured by promises of high profits.
 - In 2023, “Ariix [was] fined €960,000 eur for consumer fraud by Italy’s Competition Authority (AGCM)”.

Personal Rumors

- Bradley was rumored to have been involved in an extra marital affair with a fellow colleague at FHTM:
 - In 2011 and 2012, Bradley (then Woodson Gardner) was alleged in some online message boards of being the mistress of major FHTM salesman Todd Rowland and of being “married to a convicted child molester and registered sexual predator”.

Liberal Agenda And Partisan Record

Policy

- On social media, Bradley as promoted content indicating empathy for illegal immigrants who crossed the southern border:
 - In 2022, Bradley ‘liked’ a tweet stating “holy fucking shit, what Greg Abbott did on Christmas eve should be a fucking crime”.
- Bradley appears to be unapologetically pro-abortion:
 - Bradley has been endorsed by the pro-choice organization Emily’s List in 2024.
 - In 2023, Bradley ‘liked’ a tweet noting Kate Cox’s journey to leave Texas for abortion care as “not acceptable”.
 - In 2023, Bradley ‘liked’ a tweet asserting that the majority of abortions occur within the early time frames of pregnancy and those near the date of birth are “performed for the mother’s sake and because the fetus is not viable”.
 - In 2022, Bradley ‘liked’ a tweet opposing Lindsay Graham’s introduction of nation wide abortion bans, stating “the battle lines have been drawn. The midterms are now officially Roevenember. Vote for your rights! Vote for democracy!!Vote for democrats!!!”
- Bradley has indicated support for policies that would undermine the second amendment:
 - Bradley “... supports measures like congress's bipartisan act, as well as universal background checks and restrictions on ownership of certain types of weapons or by age...”.
- On social media, Bradley has indicated support for the LGBTQ political agenda.
- On social media, Bradley has promoted the covid vaccine.
- On social media, Bradley promoted masking and mask mandates during the covid pandemic.

Partisanship

- On social media, Bradley has promoted partisan content unbecoming of a public official:
 - In 2023, Bradley ‘liked’ a tweet denouncing Donald Trump’s donations of clean water, goya beans, and cleaning supplies to east Palestine.
 - In 2022, Bradley ‘liked’ a tweet celebrating “redacted Mar-A-Lago search warrant affidavit day”.
 - In 2022, Bradley ‘liked’ a tweet displaying a graphic alleging Donald Trump’s allegiance is to Vladimir Putin over America.
 - In 2020, Bradley ‘liked’ images depicting and influencing the arrests of Donald Trump and family members.
 - In 2020, Bradley ‘liked’ a tweet comparing Trump’s “attacking and banning the press” to that of Hitler before he “started killing people”.
 - In 2023, Bradley ‘liked’ a tweet stating “you can't hide Ivanka Trump Kushner. No matter the name, you still failed the game! I see jail in your nearest future...”.
 - In 2022, Bradley ‘liked’ a tweet claiming Ginni Thomas is a “psychotic fascist talibangelical domestic terrorist cultist who tried to overthrow the government”.
- On social media, Bradley has indicated support for prominent liberal figures – including Biden, Cooper, and Hillary Clinton.
- On social media, Bradley has promoted content criticizing efforts to investigate Hunter Biden.

BACKGROUND INFORMATION

PERSONAL INFORMATION: MARY WOODSON GARDNER BRADLEY

Full Name: Mary Woodson Bradley
Née Gardner; Formerly: Hair

DOB: February 5, 1973 (51)

Social Security: 231-92-XXXX

Primary Address: 11506 James Jack Lane
Charlotte, NC 28277
Mecklenburg County
(2018-Pres.)

Marital Status: Divorced, Remarried

Partner: William J. Bradley Jr.
DOB: June 25, 1963 (60)

Ex-Spouse: Gene Clayton Hair II (m. November 5, 2015, d. July 20, 2018)
DOB: June 29, 1958 (65)

Children: Three

Voter Registration: Registered Democrat – Mecklenburg County, North Carolina

Education: 1991 – 1995 B.S. Economics/Theology, Hollins University
1993 – 1993 B.S. Environmental Economics, University of Sydney

Employment: 2023 – Pres. Real Estate Broker, Self- Employed
2019 – Pres. Professional Speaker, Mecklenburg County Domestic
Violence Speakers Bureau
2019 – Pres. Marketing and Customer Relations, ISU Ballantyne
Insurance Group
2018 – Pres. Group Fitness Instructor, YMCA of Greater Charlotte
2008 – Unk. Platinum Sales Manager, Fortune High Tech Marketing
(FHTM)
2003 – Pres. Real Estate Business Owner, Woodson Gardner &
Associates

Associations: Precinct Chair, Mecklenburg County Democratic Party
Planning Board Member, Mecklenburg County Family Justice Center



Member, Rotary Club of Charlotte
Venue Manager, NC Special Olympics Fall Games
Parent Booster President, Mecklenburg County Marine Corps JROTC
Program

Military Service: N/A

Election Results: N/A

Web Sites: <https://www.woodsonbradley.com/>
<https://ballotpedia.org/>
<https://dlcc.org/>
<https://www.countytocountync.org/>

Social Media: [Facebook](#) (Personal)
[Facebook](#) (Campaign)
[Twitter](#) (Campaign)
[Twitter](#) (Personal 1)
[Twitter](#) (Personal 2)
[Instagram](#) (Campaign)
[LinkedIn](#) (Personal 1)
[LinkedIn](#) (Personal 2)
[YouTube](#) (Personal)
[YouTube](#) (Campaign)
[Flickr](#) (Personal)
[TikTok](#) (Campaign)

Email: WOODSON@MYBROKERS.COM
WOODSONBRADLEY@GMAIL.COM
INFO@WOODSONBRADLEY.COM
CLAYHAIR@YAHOO.COM
DUCKJOKER@GMAIL.COM

Phone: (704) 791-8509

ELECTION RESULTS

NOTE: Mary Woodson Gardner Bradley has never run for elected public office.

CAMPAIGN FINANCE

Thus far, Mary Woodson Gardner Bradley has received an aggregate of \$84,036.97 in total contributions for her campaign for the North Carolina State Senate for District 42, primarily in the form of a \$50,000 loan from her husband, William Bradley, as well as thousands of dollars from the North Carolina Senate Democratic Caucus and from individuals local to the area. Woodson Bradley has disbursed \$12,318.73 to date, primarily for operations.

Individually, Bradley has contributed an aggregate of \$840.10 to federal and statewide campaign committees. At the federal level, Bradley has contributed \$20, giving exclusively to the Democratic Senatorial Campaign Committee in 2022. At the state level, Bradley has contributed an aggregate of \$820.10, giving hundreds of dollars to Democratic Party-aligned campaign committees and candidates.

Woodson Bradley For NC (2024)

Notable Contributions

Thus Far, Bradley Has Received An Aggregate Of \$84,036.97 In Total Contributions For Her Campaign For The North Carolina State Senate. (North Carolina State Board Of Elections, Accessed 4/10/24)

- **In 2023, Bradley Received A \$50,000 Loan From Her Husband, William Bradley.** (North Carolina State Board Of Elections, Accessed 4/10/24)
- **Between January And February 2024, Bradley Received \$10,090.77 From The North Carolina Senate Democratic Caucus.** (North Carolina State Board Of Elections, Accessed 4/10/24)
- **In February 2024, Bradley Received \$1,000 From Lillian's List Political Action Committee.** (North Carolina State Board Of Elections, Accessed 4/10/24)

Notable Expenditures

Thus Far, Bradley Has Disbursed An Aggregate Of \$12,318.73 For Her Campaign For The North Carolina State Senate. (North Carolina State Board Of Elections, Accessed 4/10/24)

- **In January 2024, Bradley Disbursed \$1,537.50 To The North Carolina Senate Democratic Caucus As A Contribution For A Campaign Manager Salary.** (North Carolina State Board Of Elections, Accessed 4/10/24)

Individual Contributions**Federal Election Commission**

According To The Federal Election Commission, Bradley Has Contributed An Aggregate Of \$20 To Federal Campaign Committees. ([Federal Election Commission](#), Accessed 4/10/24)

- **In 2022, Bradley Contributed \$20 To ActBlue.** ([Federal Election Commission](#), Accessed 4/10/24)
 - **In 2022, Bradley Earmarked \$20 To The Democratic Senatorial Campaign Committee.** ([Federal Election Commission](#), Accessed 4/10/24)

North Carolina State Board Of Elections

According To The North Carolina State Board Of Elections, Bradley Has Contributed An Aggregate Of \$820.10 To Campaign Committees In The State Of North Carolina. (North Carolina State Board Of Elections, Accessed 4/10/24)

- **In 2023, Bradley Contributed \$325 To Democratic Women Of North Carolina.** (North Carolina State Board Of Elections, Accessed 4/10/24)
- **Between 2023 And January 2024, Bradley Contributed \$210.60 To Mecklenburg DEC.** (North Carolina State Board Of Elections, Accessed 4/10/24)
- **In 2023, Bradley Contributed \$150 To The Committee To Elect Laura Budd.** (North Carolina State Board Of Elections, Accessed 4/10/24)
- **In 2023, Bradley Contributed \$100 To Wesley Harris For NC.** (North Carolina State Board Of Elections, Accessed 4/10/24)
- **In 2021, Bradley Contributed \$24.50 To North Carolina Realtors PAC.** (North Carolina State Board Of Elections, Accessed 4/10/24)
- **In 2023, Bradley Loaned Or Contributed \$10 To Her Campaign.** (North Carolina State Board Of Elections, Accessed 4/10/24)

VOTING RECORDS

Mary Woodson Gardner Bradley has been an actively-registered voter in the state of North Carolina since at least December 18, 2002. Bradley was registered as an unaffiliated voter in Cabarrus County, North Carolina from December 18, 2002, to October 18, 2018, when she then registered as an unaffiliated voter in Mecklenburg County, North Carolina. Of note, Bradley has changed her party affiliation between unaffiliated and Democratic at least three times while registered in Mecklenburg County, changing from unaffiliated to Democratic as recently as August 2022. Since 2008, Bradley has failed to vote in at least six elections, including the 2012 primary election. (Note: Bradley's voter history in North Carolina prior to 2008 was not listed).

Mecklenburg County, NC

According To The North Carolina State Board Of Elections, Bradley Registered As An Unaffiliated Voter In Mecklenburg County, North Carolina On October 18, 2018. (Voter Profile Report: Mary Woodson Gardner Bradley, North Carolina State Board Of Elections, Filed 10/22/18, North Carolina Public Records Request, Filed 4/4/24)

NORTH CAROLINA VOTER REGISTRATION APPLICATION (fields in red text are required) v2018.05

1 Indicate whether you are qualified to vote or preregister to vote based on U.S. citizenship and age.

Are you a citizen of the United States of America? ☒ Yes ☐ No

Will you be at least 18 years of age on or before election day? ☒ Yes ☐ No

Are you at least 16 years of age and understand that you must be 18 years of age on or before election day to vote? ☒ Yes ☐ No

2 Provide your full legal name. (Last name, first name and middle name)

LAST NAME: GARDNER
FIRST NAME: MARY
MIDDLE NAME: WOODSON

3 Provide your date of birth and identification information.

DATE OF BIRTH: [REDACTED] State or Country of Birth: VIRGINIA

NC Driver License or NC DMV ID Number: [REDACTED] Last Four Digits of Social Security Number: [REDACTED]

☐ Check if you do not have a driver license or Social Security number. State Voter Registration Number - Optional (To locate, please "Vote! Lookup" at www.ncsbe.gov.)

4 Provide your residential address.

Address Number: 11506 Street Name and Type: JAMES JACK LN
Address Line 2 (e.g., apartment, lot or unit number):
City: CHARLOTTE State: NC Zip Code: 28277
County: MECK Have you lived at this address for 30 or more days? ☒ Yes ☐ No If "No," date moved? City: State: Zip Code:

5 Provide a mailing address, if you do not receive mail at your residential address.

Mailing Address Line 1:
Mailing Address Line 2:
Mailing Address Line 3:

6 Gender: ☐ Male ☒ Female Ethnicity: ☐ Hispanic/Latino ☒ Not Hispanic/Latino

Race: ☐ African American/Black ☐ American Indian/Alaska Native ☐ Asian ☐ Multiracial ☐ Native Hawaiian/Pacific Islander ☒ White ☐ Other

Political Party Preference: ☐ Democratic Party ☐ Republican Party ☐ Constitution Party ☐ Green Party ☐ Libertarian Party ☒ Unaffiliated (no affiliation) ☐ Other

If you select a party that is not recognized in North Carolina, you will be registered as Unaffiliated.

7 Complete if you are currently registered to vote in another NC county or in another state.

First Name Used in Last Registration: MARY Middle Name Used in Last Registration: WOODSON Last Name Used in Last Registration: GARDNER Suffix:
Address Where You Were Last Registered: 2100 St Stephens Church Rd City/State/Zip Code of Last Registration: MT Pleasant, NC 28124 County of Last Registration: CABARRUS

8 (This information is helpful if we need to contact you concerning your voter registration. This information may be disclosed as a public record.)

Area Code: 703 Phone Number: 791-8509 Email Address: [REDACTED] Would you like to be contacted to be a poll worker? ☐ Yes ☒ No

9 Sign below to attest to your qualifications to vote. FRAUDULENTLY OR FALSELY COMPLETING THIS FORM IS A CLASS 1 FELONY UNDER CHAPTER 163A OF THE NC GENERAL STATUTES.

I attest, under penalty of perjury, that in addition to having read and understood the contents of this form, that: (1) I am a United States citizen, as indicated above; (2) I am at least 18 years of age, or will be by the date of the general election; or I am at least 16 years old and understand that I must be at least 18 years old on the day of the general election to vote; I shall have been a resident of North Carolina, this county, and precinct for 30 days before the date of the election in which I intend to vote; (3) I will not vote in any other county or state after submission of this form and if I am registered elsewhere, I am cancelling that registration at this time; and (4) I have completed my sentence, including any probation.

10/22/18

(Voter Profile Report: Mary Woodson Gardner Bradley, North Carolina State Board Of Elections, Filed 10/22/18, North Carolina Public Records Request, Filed 4/4/24)

- **In August 2019, Bradley Changed Her Party Affiliation To Democratic.** (Voter Profile Report: Mary Woodson Gardner Bradley, North Carolina State Board Of Elections, Filed 8/28/19, North Carolina Public Records Request, Filed 4/4/24)

North Carolina Voter Registration Application
DMV Agency Form

Qualifications to register to vote: - You must be a <u>U.S. citizen</u> by birth or naturalization. - You must register to vote only in the <u>county in where you live</u>. - You must be <u>at least 18 years old</u> by general election day OR you may preregister if you are <u>at least 16 years old</u> and understand that you must be 18 years of age on or before election day to vote. - If convicted of a felony, you may register to vote only after you have <u>completed your sentence</u>, including probation or parole. After your sentence is completed, North Carolina automatically restores your citizenship rights including your right to vote. No special document is needed.		Please note: The location where you received this form will remain confidential and will be used only for voter registration purposes. If you choose not to register to vote, your choice not to register will also remain confidential.	
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1 Your Qualifications to Vote Check the appropriate box next to each question.			
Are you a citizen of the United States of America? Note: If you checked "No" in response to this question, DO NOT submit this form. U.S. citizenship is required to vote.		☒ Yes ☐ No	
Will you be at least 18 years of age on or before election day?		☒ Yes ☐ No	
Are you at least 16 years of age and understand that you must be 18 years of age on or before election day to vote? Note: If you checked "No" in response to both questions, DO NOT submit this form. You must be at least 18 years old to register to vote or at least 16 years old to preregister to vote.		☒ Yes ☐ No	
2 Your Name Legal Last Name BRADLEY Legal First Name MARY Middle Name WOODSON GARDNER Suffix		3 Your date of birth and identification information Date of Birth (MM/DD/YYYY) State or Country of Birth VA NC Driver License or NC DMV ID Number Last Four Digits of Social Security Number 	
4 Your Residential Address - where you physically live DO NOT enter a P.O. Box or a mail drop location. Residential Address 11506 JAMES JACK LN CHARLOTTE, NC 28277-3746 County of Residence MECKLENBURG		5 Your Mailing Address (optional) - where you receive mail If you do not receive mail where you live, please provide a mailing address. Mailing Address	
6 Your Demographic Information and Party Affiliation (optional) If you do not indicate a party affiliation, you will be registered as an unaffiliated voter.			
Gender F	Race W	Ethnicity NL	Party Affiliation DEMOCRAT
7 Your Previous Voter Registration Address (optional) Please complete this section if you are currently registered to vote in another county or state.			
Name Used in Last Registration Address Where You Were Last Registered County or State of Last Registration			
8 Your Contact Information (optional) This information may be used to contact you concerning your voter registration. This information may be disclosed as a public record.			
Phone Number 704 791-8509			
9 Your Attestation and Signature			
I attest, under penalty of perjury, that in addition to having read and understood the contents of this form, that:			
1) I am a United States citizen, as indicated above; 2) I am at least 18 years old, or will be at the time of the next general election, or I am at least 16 years old and understand that I must be at least 18 years old on Election Day of the general election in order to vote; 3) I shall have been a resident of North Carolina, this county, precinct, or other election district for 30 days before the election in which I intend to vote; 4) I will not vote in any other county or state after submission of this form and if I am registered elsewhere, I am canceling that registration at this time; and 5) I have not been convicted of a felony, or if I have been convicted of a felony, I have completed my sentence, including any probation or parole. (Citizenship and voting rights are automatically restored upon completion of the sentence. No special document is needed).			
X 08-28-2019 09:59:02 Signature Date			

(Voter Profile Report: Mary Woodson Gardner Bradley, North Carolina State Board Of Elections, Filed 8/28/19, North Carolina Public Records Request, Filed 4/4/24)

- **In December 2021, Bradley Changed Her Party Affiliation Back To Unaffiliated.**
(Voter Profile Report: Mary Woodson Gardner Bradley, North Carolina State Board Of Elections, Filed 12/10/21, North Carolina Public Records Request, Filed 4/4/24)

North Carolina Voter Registration Application DMV Agency Form

Qualifications to register to vote: - You must be a <u>U.S. citizen</u> by birth or naturalization. - You must register to vote only in the <u>county in where you live</u>. - You must be <u>at least 18 years old</u> by general election day OR you may preregister if you are <u>at least 16 years old</u> and understand that you must be 18 years of age on or before election day to vote. - You must not be currently serving a felony sentence, including any probation, post-release supervision, or parole OR you are serving an extended term of probation, post-release supervision, parole, you have outstanding fines, fees, or restitution, and you do not know of another reason that your probation, post-release supervision, or parole was extended. No special document is required.		Please note: The location where you received this form will remain <u>confidential</u> and will be used only for voter registration purposes. If you choose not to register to vote, your choice not to register will also remain confidential.
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1 Your Qualifications to Vote Check the appropriate box next to each question.	
Are you a citizen of the United States of America? ☒ Yes ☐ No Note: If you checked "No" in response to this question, DO NOT submit this form. U.S. citizenship is required to vote.	
Will you be at least 18 years of age on or before election day? ☒ Yes ☐ No	
Are you at least 16 years of age and understand that you must be 18 years of age on or before election day to vote? ☒ Yes ☐ No Note: If you checked "No" in response to both questions, DO NOT submit this form. You must be at least 18 years old to register to vote or at least 16 years old to preregister to vote.	
2 Your Name Legal Last Name BRADLEY Legal First Name MARY Middle Name WOODSON GARDNER Suffix	3 Your date of birth and identification information Date of Birth (MM/DD/YYYY) [REDACTED] State or Country of Birth [REDACTED] NC Driver License or NC DMV ID Number [REDACTED] Last Four Digits of Social Security Number [REDACTED]
4 Your Residential Address - where you physically live DO NOT enter a P.O. Box or a mail drop location. Residential Address 11506 JAMES JACK LN CHARLOTTE, NC, 28277-3746 County of Residence MECKLENBURG	5 Your Mailing Address (optional) - where you receive mail If you do not receive mail where you live, please provide a mailing address. Mailing Address 11506 JAMES JACK LN CHARLOTTE, NC, USA, 282773746
6 Your Demographic Information and Party Affiliation (optional) If you do not indicate a party affiliation, you will be registered as an unaffiliated voter.	
Gender	Race
Ethnicity	Party Affiliation UNAFFILIATED / NONE
7 Your Previous Voter Registration Address (optional) Please complete this section if you are currently registered to vote in another county or state.	
Name Used in Last Registration	
Address Where You Were Last Registered	
County or State of Last Registration	
8 Your Contact Information (optional) This information may be used to contact you concerning your voter registration. This information may be disclosed as a public record.	
Phone Number	
9 Your Attestation and Signature	
I attest, under penalty of perjury, that in addition to having read and understood the contents of this form, that:	
1) I am a United States citizen, as indicated above; 2) I am at least 18 years old, or will be at the time of the next general election, or I am at least 16 years old and understand that I must be at least 18 years old on Election Day of the general election in order to vote; 3) I shall have been a resident of North Carolina, this county, precinct, or other election district for 30 days before the election in which I intend to vote; 4) I will not vote in any other county or state after submission of this form and if I am registered elsewhere, I am canceling that registration at this time; and 5) I am not currently serving a felony sentence, including any probation, post-release supervision, or parole OR I am serving an extended term of probation, post-release supervision, or parole, I have outstanding fines, fees, or restitution, and I do not know of another reason that my probation, post-release supervision, or parole was extended. Citizenship and voting rights are automatically restored upon completion of the sentence but you will need to re-register to vote. No special document is needed.	
FRAUDULENTLY OR FALSELY COMPLETING THIS FORM IS A CLASS FELONY UNDER CHAPTER 163 OF THE NC GENERAL STATUTES.	
Signature [REDACTED]	Date 2021.12.10 13.14.28

(Voter Profile Report: Mary Woodson Gardner Bradley, North Carolina State Board Of Elections, Filed 12/10/21, North Carolina Public Records Request, Filed 4/4/24)

- **In August 2022, Bradley Changed Her Party Affiliation Back To Democratic.** (Voter Profile Report: Mary Woodson Gardner Bradley, North Carolina State Board Of Elections, Filed 8/3/22, North Carolina Public Records Request, Filed 4/4/24)

North Carolina Voter Registration Application
DMV Agency Form

Qualifications to register to vote: - You must be a <u>U.S. citizen</u> by birth or naturalization. - You must register to vote only in the <u>county in where you live</u>. - You must be <u>at least 18 years old</u> by general election day OR you may preregister if you are <u>at least 16 years old</u> and understand that you must be 18 years of age on or before election day to vote. - You must not be in jail or prison for a felony conviction.	Please note: The location where you received this form will remain <u>confidential</u> and will be used only for voter registration purposes. If you choose not to register to vote, your choice not to register will also remain confidential.
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1 Your Qualifications to Vote Check the appropriate box next to each question.			
Are you a citizen of the United States of America? Note: If you checked "No" in response to this question, DO NOT submit this form. U.S. citizenship is required to vote. ☒ Yes ☐ No			
Will you be at least 18 years of age on or before election day? ☒ Yes ☐ No			
Are you at least 16 years of age and understand that you must be 18 years of age on or before election day to vote? Note: If you checked "No" in response to both questions, DO NOT submit this form. You must be at least 18 years old to register to vote or at least 16 years old to preregister to vote. ☒ Yes ☐ No			
2 Your Name	3 Your date of birth and identification information		
Legal Last Name BRADLEY Legal First Name MARY Middle Name WOODSON GARDNER Suffix	Date of Birth (MM/DD/YYYY) [REDACTED] State or County of Birth [REDACTED] NC Driver License or NC DMV ID Number [REDACTED] Last Four Digits of Social Security Number [REDACTED]		
4 Your Residential Address - where you physically live DO NOT enter a P.O. Box or a mail drop location.	5 Your Mailing Address (optional) - where you receive mail If you do not receive mail where you live, please provide a mailing address.		
Residential Address 11506 JAMES JACK LN CHARLOTTE, NC, 28277-3746 County of Residence MECKLENBURG	Mailing Address 11506 JAMES JACK LN CHARLOTTE, NC, USA, 282773746		
6 Your Demographic Information and Party Affiliation (optional) If you do not indicate a party affiliation, you will be registered as an unaffiliated voter.			
Gender	Race	City/Town	Party Affiliation DEMOCRATIC PARTY
7 Your Previous Voter Registration Address (optional) Please complete this section if you are currently registered to vote in another county or state.			
Name Used in Last Registration Address Where You Were Last Registered County or State of Last Registration			
8 Your Contact Information (optional) This information may be used to contact you concerning your voter registration. This information may be disclosed as a public record.			
Phone Number			
9 Your Attestation and Signature			
I attest, under penalty of perjury, that in addition to having read and understood the contents of this form, that: - I am a United States citizen, as indicated above; - I am at least 18 years old, or will be at the time of the next general election, or I am at least 16 years old and understand that I must be at least 18 years old on Election Day of the general election in order to vote; - I shall have been a resident of North Carolina, this county, precinct, or other election district for 30 days before the election in which I intend to vote; - I will not vote in any other county or state after submission of this form and if I am registered elsewhere, I am canceling that registration at this time; and - I am not in jail or prison for a felony conviction. FRAUDULENTLY OR FALSELY COMPLETING THIS FORM IS A CLASS 1 FELONY UNDER CHAPTER 163 OF THE NC GENERAL STATUTES. [REDACTED] _____ Signature 2022.08.03 14.54.56 _____ Date			

(Voter Profile Report: Mary Woodson Gardner Bradley, North Carolina State Board Of Elections, Filed 8/3/22, North Carolina Public Records Request, Filed 4/4/24)

Since 2018, Bradley Has Failed To Vote In At Least Two Elections: The 2022 Primary Election; As Well As The 2019 General Election. (Voter Profile Report: Mary Woodson Gardner Bradley, North Carolina State Board Of Elections, Filed 10/22/18, North Carolina Public Records Request, Filed 4/4/24)

Changes to Voter History (Sorted by Descending Election Date)					
Election Date	Election	Voted Method	Party	Pct	
03/05/2024	03/05/2024 PRIMARY	EARLYVOTE	DEMOCRATIC	140	
11/07/2023	11/07/2023 MUNICIPAL	ABS-1STOP	DEMOCRATIC	140	
09/12/2023	09/12/2023 PRIMARY	IN-PERSON	DEMOCRATIC	140	
11/08/2022	11/08/2022 GENERAL	ABS-1STOP	DEMOCRATIC	140	
07/26/2022	07/26/2022 MUNICIPAL	IN-PERSON	UNAFFILIATED	140	
11/03/2020	11/03/2020 GENERAL	ABS-MAIL	DEMOCRATIC	140	
03/03/2020	03/03/2020 PRIMARY	ABS-1STOP	DEMOCRATIC	140	
09/10/2019	09/10/2019 PRIMARY	IN-PERSON	DEMOCRATIC	140	
11/06/2018	11/06/2018 GENERAL	ABS-1STOP	UNAFFILIATED	140	

(Voter Profile Report: Mary Woodson Gardner Bradley, North Carolina State Board Of Elections, Filed 10/22/18, North Carolina Public Records Request, Filed 4/4/24)

Cabarrus County, NC

According To The North Carolina State Board Of Elections, Bradley Registered As An Unaffiliated Voter In Cabarrus County, North Carolina On December 18, 2002. (Voter Profile Report: Mary Woodson Gardner Bradley, North Carolina State Board Of Elections, Filed 12/18/02, North Carolina Public Records Request, Filed 4/4/24)

Voter Registration Application	MS. MARY WOODSON GARDNER 120 AARON PL CONCORD, N.C. 28027-4182 COUNTY: CABARRUS		This space for Board of Election use only: 300.197.15	
	Current Address Information: 120 AARON PL CONCORD, N.C. 28027-4182 COUNTY: CABARRUS		Date of birth: Race: W Ethnicity: NL Gender: F State of birth: VA Party Affiliation: UNAFFILIATED Daytime phone #: (704) - 721-4023	
	Previous Information: 711 CORN TASSEL TRL MARTINSVILLE, NC 24112-5412		Warning! If you sign this card and know the information provided to be false, you can be convicted of a Class I Felony.	
	Voter Declaration: I certify under penalty of perjury that 1) I am a United States Citizen, 2) I am or will be a resident of North Carolina and the county of Cabarrus, 3) I am or will be at least 18 years of age by the date of the next general election, 4) I am not currently on the voter rolls of any other county or state, 5) I have not been convicted of a felony, and 6) I am not currently on the voter rolls of any other county or state.			
Signature: _____ Date: 12/18/2002		Declination: If you decline to register to vote will remain confidential and will be used only for voter registration purposes.		
Signature: _____ Date: _____				

(Voter Profile Report: Mary Woodson Gardner Bradley, North Carolina State Board Of Elections Board Of Elections, Filed 12/18/02, North Carolina Public Records Request, Filed 4/4/24)

Between 2008 And 2016, Bradley Failed To Vote In At Least Four Elections: The 2010, 2012, And 2014 Primary Elections; As Well As The 2010 General Election. (Voter Profile Report: Mary Woodson Gardner Bradley, North Carolina State Board Of Elections, Filed 12/18/02, North Carolina Public Records Request, Filed 4/4/24)

Changes to Voter History (Sorted by Descending Election Date)				
Election Date	Election	Voted Method	Party	Pct
11/08/2016	11/08/2016 GENERAL	IN-PERSON	UNAFFILIATED	07-00
03/15/2016	03/15/2016 PRIMARY	IN-PERSON	DEMOCRATIC	07-00
11/04/2014	11/04/2014 GENERAL	IN-PERSON	UNAFFILIATED	07-00
11/06/2012	11/06/2012 GENERAL	IN-PERSON	UNAFFILIATED	07-00
11/04/2008	11/04/2008 GENERAL	IN-PERSON	UNAFFILIATED	07-00

(Voter Profile Report: Mary Woodson Gardner Bradley, North Carolina State Board Of Elections, Filed 12/18/02, North Carolina Public Records Request, Filled 4/4/24)

NOTE: *Bradley's voter history in Cabarrus County, North Carolina prior to 2008 was not listed.*

CRIMINAL RECORDS

Mary Woodson Gardner Bradley and members of her family have an extensive criminal history.

Most alarmingly, Bradley's ex-husband, Gene Clayton Hair II, is a convicted sex offender registered with the Florida Department of Law Enforcement for two cases of indecent liberties with a child in Cabarrus County, North Carolina. (Note: Per conversation with the Cabarrus County Clerk of Court, Hair committed his first offense on June 1, 1998, and his second offense on June 1, 2001. Hair pled guilty to both charges of indecent liberties with a child. Bradley and Hair were married on November 5, 2005, and were later divorced on July 20, 2018, according to the Cabarrus County Clerk of Court).

Additionally, per conversation with the Cabarrus County Clerk of Court, Bradley has at least one case of domestic criminal trespassing in Cabarrus County, North Carolina; Bradley was found not guilty, and the case was dismissed in November 2018. Percipient Strategies currently awaits potentially responsive records relating to the case from Cabarrus County, North Carolina.

Moreover, per conversation with the Cabarrus County Clerk of Court and the Mecklenburg County Clerk of Court, Bradley has been issued at least four traffic citations in the state of North Carolina for offenses such as speeding and driving with an expired registration. Bradley has paid \$433 in aggregate fines for the citations.

Sex Offenses With Child (Ex-Husband)

Bradley's Ex-Husband, Gene Clayton Hair II Is A Convicted Sex Offender Registered With The Florida Department Of Law Enforcement For Two Cases Of Indecent Liberties With A Child In Cabarrus County, North Carolina. ([Florida Department of Law Enforcement](#), Accessed 4/11/24)



GENE CLAYTON HAIR II
Date of Image: 02/08/2010

Primary Information
Designation: Sexual Offender
Name: GENE CLAYTON HAIR II
Status: Released - Subject to Registration
Dept of Corrections #: Not Available Search the Dept of Corrections Website
Date of Birth: 06/29/1958
Race: White
Sex: Male
Hair: Brown
Eyes: Brown
Height: 6'00"
Weight: 180 lbs

GENE CLAYTON HAIR II is registered as a Sexual Offender.
Positive identification cannot be established unless a fingerprint comparison is made.
[Click Here to Track this Offender](#)

Aliases		
GENE HAIR, GENE C HAIR II, GENE HAIR II		

Scars, Marks & Tattoos		
Type	Body Location	SMT Count
None Reported		

Address Information		
Address	Address Source Information	Map Link
Last Reported Address - Out of State Mount Pleasant, NC 28124-9217 Cabarrus County	Source: Registration Received Date: 02/08/2010 Type of Address: Permanent	Address Not Mappable

Crime Information - Qualifying Offenses				
Adjudication Date	Crime Description	Court Case Number	Jurisdiction & State	Adjudication
08/08/2002	SEX OFFENSE, OTHER STATE (INDECENT LIBERTIES WITH A CHILD)	2001CR5023389	Cabarrus, NC	Guilty/convict
08/08/2002	SEX OFFENSE, OTHER STATE (INDECENT LIBERTIES WITH A CHILD)	2001CR5023388	Cabarrus, NC	Guilty/convict

Victim Information	
Gender	Minor
Female	Yes

([Florida Department of Law Enforcement](#), Accessed 4/11/24)

NOTE: Per conversation with the Cabarrus County Clerk of Court, Hair committed his first offense on June 1, 1998, and his second offense on June 1, 2001. Hair pled guilty to both charges of indecent liberties with a child. Bradley and Hair were married on November 5, 2005, and were later divorced on July 20, 2018, according to the Cabarrus County Clerk of Court.

Trespassing

NOTE: Per conversation with the Cabarrus County Clerk of Court, Bradley has at least one case of domestic criminal trespassing in Cabarrus County, North Carolina; Bradley was found not guilty, and the case was dismissed in November 2018. Percipient Strategies currently awaits potentially responsive records relating to the case from Cabarrus County, North Carolina

Traffic Citations

NOTE: *Per conversation with the Cabarrus County Clerk of Court and the Mecklenburg County Clerk of Court, Bradley has been issued at least four traffic citations in the state of North Carolina for offenses such as speeding and driving with an expired registration. Bradley has paid \$433 in aggregate fines for the citations.*

POLICE RECORDS

An analysis of municipal police records appears to show Mary Woodson Gardner Bradley and her family have had two notable interactions with law enforcement.

In July 2019, the Cabarrus County Sheriff's Office received a report from a social worker employed by the Mecklenburg County Department of Social Services regarding allegations a child had been "assaulted, abused and/or neglected" at a residential property address previously owned by Bradley and her then-husband, Gene Hair II, who was listed as a suspect in the initial report; in August 2019, the case status was listed as "unfounded." (Note: No additional actions appear to have been taken by law enforcement).

In January 2019, the Cabarrus County Sheriff's Office received a call regarding Bradley's ex-husband, Gene Hair II, alleging he was the victim of fraud and claiming "someone had forged his name on some tax documents," with Bradley being listed as a suspect in the initial report; in February 2019, the case status was listed as "exceptionally cleared" with a case disposition stating "victim refused to." It should be noted that previously in July 2018, Hair filed a complaint with the North Carolina Real Estate Commission alleging Bradley "used documents that have been overlaid altered and forged to obtain loans and or moneys." (Note: No additional actions appear to have been taken by law enforcement. Percipient Strategies currently awaits potentially responsive records relating to Bradley's possible police records from multiple other law enforcement agencies).

Alleged Sexual Offense Of A Juvenile Claims (Ex-Husband)

In July 2019, The Cabarrus County Sheriff's Office Received A Report From A Social Worker Employed By The Mecklenburg County Department Of Social Services Regarding Allegations A Child Had Been "Assaulted, Abused And/Or Neglected" At A Residential Property Address Previously Owned By Bradley And Her Ex-Husband, Gene Hair II.

(Incident No. 19-0723-0006, Cabarrus County Sheriff's Department, Filed 7/23/19, North Carolina Public Records Request, Filled 3/28/24)

		INCIDENT/INVESTIGATION REPORT				Case# 19-0723-0006			
I N C I D E N T D A T A	Agency Name	Cabarrus County Sheriff Office				Date / Time Reported 07/23/2019 14:28 Tue			
	ORI	NC 0130000				Last Known Secure 07/23/2019 14:28 Tue			
	Location of Incident	Gang Relat	Premise Type	/Zone	At Found 07/23/2019 14:28 Tue				
	2100 ST STEPHENS CHURCH RD, Mt Pleasant		NO	Residence/home	236				
	#1	Crime Incident(s)	(Com)	Weapon / Tools			Activity		
		Sex Offense		Entry	Exit	Security			
		SEXOFFEN							
	#2	Crime Incident	()	Weapon / Tools			Activity		
				Entry	Exit	Security			
	#3	Crime Incident	()	Weapon / Tools			Activity		
				Entry	Exit	Security			
MO									
V I C T I M	# of Victims	1		Type: INDIVIDUAL/ NOT LAW	Injury:		Domestic: NO		
	V1	JUVENILE		Victim of Crime #	DOB / /	Race	Sex	Relationship To Offender	
				1,	Age	W	F	ICH	
								Non-Resident	
								Military Branch/Status	
	Home Address		Email		Home Phone				
	Employer Name/Address		Business Phone		Mobile Phone				
	VYR	Make	Model	Style	Color	Lic/Lis	VIN		
O T H E R S	CODES: V- Victim (Denote V2, V3) W1 = Witness IO = Involved Other RP = Reporting Person (if other than victim)								
	Type: INDIVIDUAL/ NOT LAW ENFORCEMENT				Injury:				
	Code	Name (Last, First, Middle)		Victim of Crime #	DOB	Race	Sex	Relationship To Offender	
	IO	BRADLEY, MARY WOODSON				W	F		
								Resident Status	
								Military Branch/Status	
	Home Address		Email		Home Phone				
	JAMES JACK LN CHARLOTTE, NC 28277								
	Employer Name/Address		Business Phone		Mobile Phone				
I N V O L V E D	Type: INDIVIDUAL/ NOT LAW ENFORCEMENT				Injury:				
	Code	Name (Last, First, Middle)		Victim of Crime #	DOB	Race	Sex	Relationship To Offender	
	IO	LAWRENCE, VERANDA			Age	B	F		
								Resident Status	
								Military Branch/Status	
	Home Address		Email		Home Phone				
	Employer Name/Address		Business Phone		Mobile Phone				
	Meck Co Dss (SOCIAL WORKER)								
	1 = None 2 = Burned 3 = Counterfeit / Forged 4 = Damaged / Vandalized 5 = Recovered 6 = Seized 7 = Stolen 8 = Unknown ("OJ" = Recovered for Other Jurisdiction)								

INCIDENT/INVESTIGATION REPORT

Narr. (cont.) OCA: 19-0723-0006

Cabarrus County Sheriff Office

NARRATIVE

The Cabarrus County Sheriff's Office Criminal Investigations Division received an electronic copy of a Mecklenburg County Department of Social Services (MCDSS) report, via the Charlotte Mecklenburg Police Department, where allegations were made that a child had been assaulted, abused and/or neglected.

(Incident No. 19-0723-0006, Cabarrus County Sheriff's Department, Filed 7/23/19, North Carolina Public Records Request, Filed 3/28/24)

- **Hair Was Listed As A Suspect In The Report.** (Incident No. 19-0723-0006, Cabarrus County Sheriff's Department, Filed 7/23/19, North Carolina Public Records Request, Filed 3/28/24)

Incident Report Suspect List

Cabarrus County Sheriff Office

OCA: 19-0723-0006

1	Name (Last, First, Middle) HAIR, GENE CLAYTON II					Also Known As					Home Address 2100 ST STEPHENS CHURCH RD MT PLEASANT, NC 28124																																	
	Business Address HAIR MOTORSPORTS RACE INSTRUCTOR, 2101 EAST GOLDHILL RD MT																																											
	DOB [REDACTED]	Age 61	Race W	Sex M	Eth N	Hgt 600	Wgt 170	Hair BRO	Eye BRO	Skin FAR	Driver's License / State [REDACTED]																																	
Scars, Marks, Tattoos, or other distinguishing features																																												
<table border="1"> <tr> <td colspan="2">Reported Suspect Detail</td> <td colspan="2">Suspect Age</td> <td>Race</td> <td>Sex</td> <td>Eth</td> <td>Height</td> <td>Weight</td> <td>SSN</td> </tr> <tr> <td>Weapon, Type</td> <td>Feature</td> <td colspan="2">Make</td> <td colspan="2">Model</td> <td>Color</td> <td>Caliber</td> <td colspan="2">Dir of Travel Mode of Travel</td> </tr> <tr> <td colspan="2">Veh Yr / Make / Model</td> <td>Drs</td> <td>Style</td> <td colspan="2">Color</td> <td colspan="2">Lic Plate / State</td> <td colspan="2">VIN</td> </tr> </table>															Reported Suspect Detail		Suspect Age		Race	Sex	Eth	Height	Weight	SSN	Weapon, Type	Feature	Make		Model		Color	Caliber	Dir of Travel Mode of Travel		Veh Yr / Make / Model		Drs	Style	Color		Lic Plate / State		VIN	
Reported Suspect Detail		Suspect Age		Race	Sex	Eth	Height	Weight	SSN																																			
Weapon, Type	Feature	Make		Model		Color	Caliber	Dir of Travel Mode of Travel																																				
Veh Yr / Make / Model		Drs	Style	Color		Lic Plate / State		VIN																																				
Notes							Physical Char																																					

(Incident No. 19-0723-0006, Cabarrus County Sheriff's Department, Filed 7/23/19, North Carolina Public Records Request, Filled 3/28/24)

- **In August 2019, The Case Status Was Listed As "Unfounded."** (Incident No. 19-0723-0006, Cabarrus County Sheriff's Department, Filed 8/27/19, North Carolina Public Records Request, Filled 3/28/24)

Officer/ID#	PFISTER, K. G. (ADMN, ADM) (0165)		
Invest ID#	RHINEHARDT, J. C. (YDS, SRO) (0331)		
Status	Complainant Signature	Case Status Unfounded	Case Disposition: 08/27/2019
R_CSIIIBR		Printed By: KKLING, SHFKLINK	Sys#: 75323

03/27/2024 11:49

(Incident No. 19-0723-0006, Cabarrus County Sheriff's Department, Filed 8/27/19, North Carolina Public Records Request, Filled 3/28/24)

- **Hair Had Been Previously Convicted For Two Cases Of Indecent Liberties With A Child In Cabarrus County, North Carolina, Resulting In Hair's Registration As A Sex Offender According To The Florida Department Of Law Enforcement In August 2002.** ([Florida Department of Law Enforcement](#), Accessed 4/11/24)



GENE CLAYTON HAIR II
Date of Image: 02/08/2010

Primary Information
Designation: Sexual Offender
Name: GENE CLAYTON HAIR II
Status: Released - Subject to Registration
Dept of Corrections #: Not Available Search the Dept of Corrections Website
Date of Birth: 06/29/1958
Race: White
Sex: Male
Hair: Brown
Eyes: Brown
Height: 6'00"
Weight: 180 lbs

GENE CLAYTON HAIR II is registered as a Sexual Offender.
Positive identification cannot be established unless a fingerprint comparison is made.
[Click Here to Track this Offender](#)

Aliases		
GENE HAIR, GENE C HAIR II, GENE HAIR II		

Scars, Marks & Tattoos		
Type	Body Location	SMT Count
None Reported		

Address Information		
Address	Address Source Information	Map Link
Last Reported Address - Out of State Mount Pleasant, NC 28124-9217 Cabarrus County	Source: Registration Received Date: 02/08/2010 Type of Address: Permanent	Address Not Mappable

Crime Information - Qualifying Offenses				
Adjudication Date	Crime Description	Court Case Number	Jurisdiction & State	Adjudication
08/08/2002	SEX OFFENSE, OTHER STATE (INDECENT LIBERTIES WITH A CHILD)	2001CR5023389	Cabarrus, NC	Guilty/convict
08/08/2002	SEX OFFENSE, OTHER STATE (INDECENT LIBERTIES WITH A CHILD)	2001CR5023388	Cabarrus, NC	Guilty/convict

Victim Information	
Gender	Minor
Female	Yes

([Florida Department of Law Enforcement](#), Accessed 4/11/24)

NOTE: No additional actions appear to have been taken by law enforcement.

Alleged Forgery Claims

In January 2019, The Cabarrus County Sheriff's Office Received A Call Regarding Bradley's Ex-Husband, Gene Clayton Hair II, Alleging He Was The Victim Of Fraud And Claiming "Someone Had Forged His Name On Some Tax Documents." (Incident No. 19-0118-0006, Cabarrus County Sheriff's Department, Filed 1/18/19, North Carolina Public Records Request, Filed 3/28/24)

INCIDENT/INVESTIGATION REPORT		Case#	
		19-0118-0006	
Agency Name <i>Cabarrus County Sheriff Office</i>		Date / Time Reported <i>01/18/2019 13:57 Fri</i>	
ORI <i>NC 0130000</i>		Last Known Secure <i>01/18/2019 13:57 Fri</i>	
Location of Incident <i>2100 ST STEPHENS CHURCH RD, Mt Pleasant</i>		Gang Relat <i>NO</i>	Premise Type <i>Other/unknown</i>
		/Zone <i>236</i>	At Found <i>01/18/2019 13:57 Fri</i>
I N C I D E N T D A T A	#1	Crime Incident(s) <i>Forgery-undetermined FORGERYUNKN</i>	(Com)
	Weapon / Tools <i>None</i>		Activity <i>U</i>
	Entry		Exit
	Security		
	#2	Crime Incident	()
	Weapon / Tools		Activity
Entry		Exit	
Security			
#3	Crime Incident	()	
Weapon / Tools		Activity	
Entry		Exit	
Security			
MO			
# of Victims <i>1</i> Type: INDIVIDUAL/ NOT LAW Injury: Domestic: NO			
V I C T I M	Victim/Business Name (Last, First, Middle) <i>HAIR, GENE CLAYTON II</i>		Victim of Crime # <i>1,</i>
	DOB <i>Age 60</i>		Race <i>W</i>
	Sex <i>M</i>		Relationship To Offender <i>ISE</i>
	Resident Status <i>Resident</i>		Military Branch/Status
	Home Address <i>2100 ST STEPHENS CHURCH RD, Mt Pleasant, NC 28124-</i>		Email <i>@yahoo.com</i>
	Employer Name/Address <i>HAIR MOTORSPORTS 2101 EAST GOLDHILL RD MT PLEASANT NC 28124 (RACE</i>		Business Phone <i>704- -</i>
VYR	Make	Model	Style
Color	Lie/Lis	VIN	

INCIDENT/INVESTIGATION REPORT

Narr. (cont.) OCA: 19-0118-0006

Cabarrus County Sheriff Office

NARRATIVE

On January 18, 2019 communications dispatched Deputy to a Fraud report at 2100 Saint Stephens Church Road.

Deputy arrived on scene and spoke to the caller who stated someone had forged his name on some tax documents.

Deputy gathered all the information, put the documents in evidence, and a report was taken.

(Incident No. 19-0118-0006, Cabarrus County Sheriff's Department, Filed 1/18/19, North Carolina Public Records Request, Filed 3/28/24)

- **Bradley Was Listed As A Suspect In The Report.** (Incident No. 19-0118-0006, Cabarrus County Sheriff's Department, Filed 1/18/19, North Carolina Public Records Request, Filed 3/28/24)

Incident Report Suspect List

Cabarrus County Sheriff Office

OCA: 19-0118-0006

1	Name (Last, First, Middle) BRADLEY, MARY WOODSON					Also Known As					Home Address JAMES JACK LN LOTTE, NC 28277																																													
	Business Address																																																							
	DOB [REDACTED]	Age 45	Race W	Sex F	Eth N	Hgt 508	Wgt	Hair BRO	Eye BLU	Skin FAR	Driver's License / State 2 [REDACTED] NC																																													
Scars, Marks, Tattoos, or other distinguishing features																																																								
<table border="1"> <tr> <td colspan="2">Reported Suspect Detail</td> <td colspan="2">Suspect Age</td> <td>Race</td> <td>Sex</td> <td>Eth</td> <td colspan="2">Height</td> <td colspan="2">Weight</td> <td colspan="3">SSN</td> </tr> <tr> <td colspan="2">Weapon, Type</td> <td colspan="2">Feature</td> <td colspan="2">Make</td> <td colspan="2">Model</td> <td colspan="2">Color</td> <td>Caliber</td> <td colspan="3">Dir of Travel</td> </tr> <tr> <td colspan="2">Veh Yr / Make / Model</td> <td>Drs</td> <td colspan="2">Style</td> <td colspan="2">Color</td> <td colspan="2">Lic Plate / State</td> <td colspan="3">VIN</td> <td colspan="2"></td> </tr> </table>															Reported Suspect Detail		Suspect Age		Race	Sex	Eth	Height		Weight		SSN			Weapon, Type		Feature		Make		Model		Color		Caliber	Dir of Travel			Veh Yr / Make / Model		Drs	Style		Color		Lic Plate / State		VIN				
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Notes																																																								
Physical Char																																																								

(Incident No. 19-0118-0006, Cabarrus County Sheriff's Department, Filed 1/18/19, North Carolina Public Records Request, Filed 3/28/24)

- **In February 2019, The Case Status Was Listed As "Exceptionally Cleared" With A Case Disposition Stating The "Victim Refused To" With No Additional Details Listed.** (Incident No. 19-0118-0006, Cabarrus County Sheriff's Department, Filed 2/21/19, North Carolina Public Records Request, Filed 3/28/24)

Officer/ID#	JACKSON, S. A. (CID, HB) (0633)		
Invest ID#	HELMS, J. W. (CID, HB) (0391)		Supervisor WENSIL, R. K. (AUX) (0144)
Status	Complainant Signature	Case Status <i>Exceptionally Cleared</i> 02/21/2019	Case Disposition: <i>Victim Refused To</i> 02/20/2019 Page 1
R_CS1IBR		Printed By: KKLING, SHFKLINK	Sys#: 73086 03/27/2024 11:47

(Incident No. 19-0118-0006, Cabarrus County Sheriff's Department, Filed 2/21/19, North Carolina Public Records Request, Filed 3/28/24)

- **Previously In July 2018, Clay Hair (Likely Referring To Gene Clayton Hair II) Filed A Complaint With The North Carolina Real Estate Commission Alleging Bradley "Used Documents That Have Been Overlaid Altered And Forged To Obtain Loans And Or Moneys."** (Complaint, North Carolina Real Estate Commission, Filed 7/3/18, North Carolina Public Records Request, Filed 4/2/24)



OFFICE USE	
File #	019 0012
Order ID	A9437-766713-180703224251

NORTH CAROLINA REAL ESTATE COMMISSION
P.O. Box 17100 Raleigh, N.C. 27619-7100
Phone (919) 875-3700 • Email: ra@ncrec.gov
Website: www.ncrec.gov

COMPLAINT

INSTRUCTIONS

1. This form should be used when filing a complaint with the North Carolina Real Estate Commission against a real estate broker or a time share project (hereinafter "licensee").
2. Please fill in the information requested below. Then answer the questions and state your complaint on page two of this form.
3. **Your complaint will become a public record, and a copy of it will be given to the real estate licensee complained against.**
4. Persons who file complaints must be willing to appear as a witness, be sworn, testify and be cross-examined concerning the allegations made in their complaints.

IMPORTANT

The Real Estate Commission investigates complaints against real estate licensees accused of misconduct. If the Commission finds that real estate licensees have violated the Real Estate License Law or Commission rules, it can suspend or revoke their licenses.

The Real Estate Commission cannot give legal advice or act as your attorney. The Commission cannot assist in resolving disputes involving such matters as quality of workmanship of construction or the payment of real estate brokerage fees. The Commission cannot order monies to be paid or refunded to you or contracts to be canceled. If you have these types of problems, you should consult your attorney.

TYPE OR PRINT CLEARLY IN INK

Clay Hair	clayhair1@gmail.com
Your full name (Identifies you as Complaining Witness)	Email Address
2100 St. Stephens Ch. Rd. Mt. Pleasant NC 28124	704-436-2037
Mailing Address (Street, City, State, Zip code)	Home Phone
	980-622-0210
	Cell Phone

REAL ESTATE LICENSEE(S) COMPLAINED AGAINST

BROKER #1

Licensee's Name Woodson Gardner
Company Name EXP Reality
Company Address 8593 Blue Heron Drive
City, State, Zip Terrell NC 28682

BROKER #2 (IF ANY)

Licensee's Name
Company Name
Company Address 2100 St. Stephens Ch. Rd.
City, State, Zip Mt. Pleasant NC 28124

DO NOT WRITE IN THIS SPACE

202549

Have you hired or consulted an attorney regarding your complaint? ☐ Yes ☒ No

If "Yes" give name _____

Is there a pending or completed lawsuit regarding your complaint? ☐ Yes ☒ No

When did this event occur? 09/16/2016

Where did this event occur? Mt. Pleasant

Provide a detailed written statement of the full essentials of your complaint. Be factual. **Furnish copies of all documents pertaining to your complaint (contracts, letters, etc.), retaining the originals for your files.** Include the name, address, and telephone number of any witness(es) to the transaction in question. Attach additional sheets if necessary. PLEASE TYPE OR PRINT LEGIBLY.

Woodson Gardner has used Documents that have been overlaid altered and forged to obtain loans and or moneys.

The undersigned hereby swears or affirms that the foregoing statement and the attachments hereto are true.

Clayton Hair

Signature of Complaining Witness

07-02-2018

Date

(Complaint, North Carolina Real Estate Commission, Filed 7/3/18, North Carolina Public Records Request, Filed 4/2/24)

NOTE: No additional actions appear to have been taken by law enforcement.

REAL PROPERTY RECORDS***11506 James Jack Lane, Charlotte, NC, Mecklenburg County***

This is the residence owned by Mary Woodson Gardner Bradley's husband, William Bradley; Bradley has lived at the property since at least 2018, according to her voter registration. This single-family residence comprises four bedrooms and five bathrooms and has a 2024 appraised value of \$1,323,100. Bradley's husband has owned this property since June 2002.



([Mecklenburg County GIS](#), Accessed 4/11/24)

Property Information

Full Address:	11506 James Jack Lane, Charlotte, NC 28277
County:	Mecklenburg County
Parcel ID:	22310347
Property Type:	Single Family Residential
Owner:	BRADLEY WILLIAM J., JR.
Sale Date:	06/03/2002
Sale Price:	\$875,000
Year Built:	2000
Total Bedrooms:	4
Total Bathrooms:	5
Total Square Footage:	8,473
2024 Appraised Value:	\$1,323,100

([Mecklenburg County Assessor](#), Accessed 4/11/24)

Tax Information

In 2023, Bradley's Husband, William Bradley, Paid \$9,844.08 In Total Municipal Property Taxes. ([Mecklenburg County Tax Collector](#), Accessed 4/11/24)

[Go To Abstract](#) [New Search](#) [Return](#)**Property Tax Collections
Bill Detail**

BRADLEY, WILLIAM J., JR.		Property Tax	Real Property
Description:	L614 M30-843	Bill Status:	PAID
Location:	11506 JAMES JACK LN CHARLOTTE NC 28277	Bill Flag:	
Mailing Address:	11506 JAMES JACK LN CHARLOTTE NC 28277	Bill #:	0002025819-2023-2023-0000-00
Parcel #:	22310347	Old Bill #:	
Lender:	00074	Old Account #:	
		Due Date:	9/1/2023
		Interest Begins:	1/6/2024
	Value	Rate	Tax Districts
Real	\$1,323,100	.4731	MECKLENBURG
Deferred	\$0		
Use	\$1,323,100		MECKLENBURG
Personal	\$0	.2604	CHARLOTTE
Exempt & Exclusion	\$0		CHARLOTTE
Total Assessed Value		\$1,323,100	
		Interest: \$0.00	
		Total Billed: \$9,844.08	

Transaction History				
Date	Type	Paid By	Trans #	Amount
11/22/2023	PAYMENT	2023 - 74	14237809	\$9,844.08

Current Due: **\$0.00**

000000000020232023000000020258190

Correct if paid by

(Mecklenburg County Tax Collector, Accessed 4/11/24)

Additional Properties

NOTE: According to the Watauga County Property Assessor, Bradley and her husband, William Bradley, also own at least two condominium properties located in Blowing Rock, North Carolina.

BANKRUPTCIES, JUDGMENTS, & LIENS RECORDS

Mary Woodson Gardner Bradley has a bevy of financial issues.

In December 2013, Bradley, then-Gardner-Hair, and her then-husband Gene Hair voluntarily petitioned for Chapter 13 bankruptcy; in March 2015, the petition was converted from a Chapter 13 bankruptcy to a Chapter 7 bankruptcy. In July 2015, Bradley and Hair's petition was granted and their debts were discharged.

Additionally, in December 2018, Bradley was issued a federal tax lien of \$46,478.27; in August 2020, the lien was satisfied. In March 2006, Bradley was issued A homeowners association lien filed against her by the Tuscan Court Homeowners Association Inc., demanding \$485; in April 2006, the lien was satisfied.

Moreover, per conversation with the Cabarrus County Clerk of Court, Bradley has at least one small claims case and at least one evictions case in Cabarrus County, North Carolina. (Note: Percipient Strategies currently awaits potentially responsive records relating to the cases from Cabarrus County, North Carolina).

Bankruptcy

In December 2013, Bradley, Then-Gardner-Hair, And Her Then-Husband Gene Hair Voluntarily Petitioned For Chapter 13 Bankruptcy. (13-51504, *Mary Woodson Gardner-Hair Voluntary Bankruptcy Petition*, U.S. Bankruptcy Court Middle District Of North Carolina, Filed 12/5/13)

B1 (Official Form 1)(04/13)

United States Bankruptcy Court Middle District of North Carolina		Voluntary Petition
Name of Debtor (if individual, enter Last, First, Middle): Hair, Gene Clayton II		Name of Joint Debtor (Spouse) (Last, First, Middle): Gardner-Hair, Mary Woodson
All Other Names used by the Debtor in the last 8 years (include married, maiden, and trade names):		All Other Names used by the Joint Debtor in the last 8 years (include married, maiden, and trade names):
Last four digits of Soc. Sec. or Individual-Taxpayer I.D. (ITIN)/Complete EIN (if more than one, state all) xxx-xx-2466		Last four digits of Soc. Sec. or Individual-Taxpayer I.D. (ITIN) No./Complete EIN (if more than one, state all) xxx-xx-7284
Street Address of Debtor (No. and Street, City, and State): 2101 E. Gold Hill Rd. Mount Pleasant, NC ZIP Code 28124		Street Address of Joint Debtor (No. and Street, City, and State): 2101 E. Gold Hill Rd. Mount Pleasant, NC ZIP Code 28124
County of Residence or of the Principal Place of Business: Cabarrus		County of Residence or of the Principal Place of Business: Cabarrus
Mailing Address of Debtor (if different from street address): ZIP Code		Mailing Address of Joint Debtor (if different from street address): ZIP Code
Location of Principal Assets of Business Debtor (if different from street address above):		
Type of Debtor (Form of Organization) (Check one box) ☒ Individual (includes Joint Debtors) <i>See Exhibit D on page 2 of this form.</i> ☐ Corporation (includes LLC and LLP) ☐ Partnership ☐ Other (If debtor is not one of the above entities, check this box and state type of entity below.)	Nature of Business (Check one box) ☐ Health Care Business ☐ Single Asset Real Estate as defined in 11 U.S.C. § 101 (51B) ☐ Railroad ☐ Stockbroker ☐ Commodity Broker ☐ Clearing Bank ☐ Other	Chapter of Bankruptcy Code Under Which the Petition is Filed (Check one box) ☐ Chapter 7 ☐ Chapter 9 ☐ Chapter 11 ☐ Chapter 12 ☒ Chapter 13 ☐ Chapter 15 Petition for Recognition of a Foreign Main Proceeding ☐ Chapter 15 Petition for Recognition of a Foreign Nonmain Proceeding
Chapter 15 Debtors Country of debtor's center of main interests: Each country in which a foreign proceeding by, regarding, or against debtor is pending:	Tax-Exempt Entity (Check box, if applicable) ☐ Debtor is a tax-exempt organization under Title 26 of the United States Code (the Internal Revenue Code).	Nature of Debts (Check one box) ☒ Debts are primarily consumer debts, defined in 11 U.S.C. § 101(8) as "incurred by an individual primarily for a personal, family, or household purpose." ☐ Debts are primarily business debts.

(13-51504, *Mary Woodson Gardner-Hair Voluntary Bankruptcy Petition*, U.S. Bankruptcy Court Middle District Of North Carolina, Filed 12/5/13)

- **Bradley And Hair Declared Their Assets Were Valued At \$623,418.25.** (13-51504, *Mary Woodson Gardner-Hair Voluntary Bankruptcy Petition*, U.S. Bankruptcy Court Middle District Of North Carolina, Filed 12/5/13)
- **Bradley And Hair Declared Their Liabilities Were Valued At \$820,878.64.** (13-51504, *Mary Woodson Gardner-Hair Voluntary Bankruptcy Petition*, U.S. Bankruptcy Court Middle District Of North Carolina, Filed 12/5/13)

NAME OF SCHEDULE	ATTACHED (YES/NO)	NO. OF SHEETS	ASSETS	LIABILITIES	OTHER
A - Real Property	Yes	1	590,000.00		
B - Personal Property	Yes	4	33,418.25		
C - Property Claimed as Exempt	Yes	4			
D - Creditors Holding Secured Claims	Yes	2		747,986.67	
E - Creditors Holding Unsecured Priority Claims (Total of Claims on Schedule E)	Yes	3		21,493.97	
F - Creditors Holding Unsecured Nonpriority Claims	Yes	9		51,398.00	
G - Executory Contracts and Unexpired Leases	Yes	1			
H - Codebtors	Yes	1			
I - Current Income of Individual Debtor(s)	Yes	1			7,611.50
J - Current Expenditures of Individual Debtor(s)	Yes	1			5,245.00
Total Number of Sheets of ALL Schedules		27			
Total Assets			623,418.25		
Total Liabilities				820,878.64	

(13-51504, *Mary Woodson Gardner-Hair Voluntary Bankruptcy Petition*, U.S. Bankruptcy Court Middle District Of North Carolina, Filed 12/5/13)

- **In March 2015, The Petition Was Converted From A Chapter 13 Bankruptcy To A Chapter 7 Bankruptcy.** (13-51504, *Mary Woodson Gardner-Hair Voluntary Bankruptcy Petition*, U.S. Bankruptcy Court Middle District Of North Carolina, Filed 3/16/15)

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF NORTH CAROLINA

IN THE MATTER OF:

Gene Clayton Hair, II
Mary Woodson Gardner-Hair

Debtor(s)

NOTICE OF CONVERSION
FROM CHAPTER 13 TO CHAPTER 7

TAKE NOTICE THAT pursuant to Section 1307(a) and Bankruptcy rule 1017(f)(3), the undersigned debtor(s) hereby files this Notice of Conversion to Chapter 7 and provides the following information:

1. On December 5, 2013, the above named debtor(s) filed a Petition under Chapter 13 of the Bankruptcy Code.
2. (Check appropriate boxes)
 - A. Debtor(s) Plan was confirmed ☒ Yes ☐ No
 - B. Debtor(s) was present at first Creditors Meeting ☒ Yes ☐ No
 - C. Debtor(s) owns real estate ☒ Yes ☐ No
3. Debtor(s) is represented by an attorney in this conversion ☒ Yes ☐ No

The Debtor(s) present mailing address is:

2100 Saint Stephens Ch Rd.
Mount Pleasant, NC 28124

*Attorney's signature as well as petitioner(s) is required where attorney is handling conversion

Date: March 16, 2015

Respectfully submitted:

Gene Clayton Hair, II
Debtor

Mary Woodson Gardner-Hair
Debtor

Amy S. Davis
Attorney of Record's
State Bar No.: 22809

Amy S. Davis
Attorney's Name & Address

(13-51504, Mary Woodson Gardner-Hair Voluntary Bankruptcy Petition, U.S. Bankruptcy Court Middle District Of North Carolina, Filed 3/16/15)

In July 2015, Bradley And Hair's Petition Was Granted And Their Debts Were Discharged. (13-51504, Mary Woodson Gardner-Hair Voluntary Bankruptcy Petition, U.S. Bankruptcy Court Middle District Of North Carolina, Filed 7/8/15)

B18 (Official Form 18) (12/07)

UNITED STATES BANKRUPTCY COURT
Middle District of North Carolina
226 S. Liberty Street
Winston-Salem, NC 27101

Bankruptcy Case No.: 13-51504

In re: Debtor(s) (name(s) used by the debtor(s) in the last 8 years, including married, maiden, trade, and address):

Chapter: 7

Gene Clayton Hair II xxx-xx-2466
2100 Saint Stephens Ch Rd
Mount Pleasant, NC 28124Mary Woodson Gardner-Hair xxx-xx-7284
2100 Saint Stephens Ch Rd.
Mount Pleasant, NC 28124

Debtor(s)

DISCHARGE OF DEBTOR

It appearing that the debtor is entitled to a discharge,

IT IS ORDERED:

The debtor is granted a discharge under section 727 of title 11, United States Code, (the Bankruptcy Code).

Dated: 7/8/15

Catharine R. Aron
United States Bankruptcy Judge

(13-51504, *Mary Woodson Gardner-Hair Voluntary Bankruptcy Petition*, U.S. Bankruptcy Court Middle District Of North Carolina, Filed 7/8/15)

Tax Liens**Federal Tax Liens**

In December 2018, Bradley, Then-Gardner, Was Issued A Federal Tax Lien Of \$46,478.27 In Mecklenburg County, North Carolina. (Case No. 18M008715-590, Mecklenburg County District Court, Filed 12/12/18)

18M008715-590**Case Style - DEPT OF THE TREASURY INTERNAL REVENUE SERVICE VS
MARY W GARDNER**

Cause of Action

CV - Federal Tax Lien

Civil Judgment

Money Judgment

Index Date: 12/12/2018 Time: 4:32 PM

By: DEPT OF THE TREASURY INTERNAL REVENUE SERVICE

Against: GARDNER, MARY W

County: Mecklenburg District Court

Current Status: Canceled

Current Status Date: 08/05/2020

Current Status Comment: J001-M0001 CANCEL REASON: PAID AND SATISFIED IN FULL TO PARTY

Judgment Amount Calculation:

Pre-Judgment Amount: \$0.00

Principal Amount: \$46478.27

Attorney Fees: \$0.00

Interest Rate: 8.0000%

Total Judgment: \$46478.27

(Case No. 18M008715-590, Mecklenburg County District Court, Filed 12/12/18)

- **In August 2020, The Lien Was Satisfied.** (Case No. 18M008715-590, Mecklenburg County District Court, Filed 8/5/20)

State & Local Tax Liens

In March 2006, Bradley, Then-Gardner, Was Issued A Homeowners Association Lien Filed Against Her By The Tuscany Court Homeowners Association Inc., Demanding \$485 In Mecklenburg County, North Carolina. (Case No. 06M003110-590, Mecklenburg County District Court, Filed 3/29/06)

06M003110-590**Case Style - TUSCANY COURT HOMEOWNERS ASSN INC VS MARY WOODSON GARDNER**

Cause of Action

CV - Claim of Lien

Civil Judgment

Money JudgmentIndex Date: **03/29/2006** Time: **2:53 PM**By: **TUSCANY COURT HOMEOWNERS ASSN INC**Against: **GARDNER, MARY WOODSON**County: **Mecklenburg District Court**Current Status: **Canceled**Current Status Date: **04/04/2006**Current Status Comment: **J001-M0001 CANCEL REASON: PAID AND SATISFIED IN FULL TO PARTY**

Judgment Amount Calculation:

Pre-Judgment Amount: **\$0.00**Principal Amount: **\$485.00**Attorney Fees: **\$0.00**Interest Rate: **8.0000%**Total Judgment: **\$485.00**

(Case No. 06M003110-590, Mecklenburg County District Court, Filed 3/29/06)

- **In April 2006, The Lien Was Satisfied.** (Case No. 06M003110-590, Mecklenburg County District Court, Filed 4/4/06)

Evictions

NOTE: Per conversation with the Cabarrus County Clerk of Court, Bradley has at least one evictions complaint filed against her in Cabarrus County, North Carolina. Percipient Strategies currently awaits potentially responsive records relating to the case from Cabarrus County, North Carolina.

Civil Judgment & Small Claims

NOTE: Per conversation with the Cabarrus County Clerk of Court, Bradley has at least one small claims complaint filed against her in Cabarrus County, North Carolina. Percipient Strategies currently awaits potentially responsive records relating to the case from Cabarrus County, North Carolina.

LEGAL ISSUES

Mary Woodson Gardner Bradley has been involved in at least three legal cases.

Per conversation with the Cabarrus County Clerk of Court, Bradley has at least one dismissed petition for divorce and at least one granted petition for divorce in Cabarrus County, North Carolina. (Note: Records relating to the divorce cases were not readily available. Percipient Strategies currently awaits potentially responsive records relating to the two divorce cases from Cabarrus County, North Carolina).

In February 2001, Bradley filed a temporary restraining order complaint against Harrison Paul Anderson II, who Bradley claimed was her former boyfriend and had committed "repeated violent incidents during the period from January 1997 through August 1999." In February 2001, the temporary restraining order was approved, and in March 2001, the case was dismissed without prejudice and the temporary restraining order was vacated.

Divorce

NOTE: *Per conversation with the Cabarrus County Clerk of Court, Bradley has at least one dismissed petition for divorce and at least one granted petition for divorce in Cabarrus County, North Carolina. Records relating to the divorce cases were not readily available online. Percipient Strategies currently awaits potentially responsive records relating to the two divorce cases from Cabarrus County, North Carolina.*

Civil Complaints

Mary Woodson Gardner V. Gene C. Hair II

In November 2019, Bradley, Then-Gardner, Filed A Civil Complaint Against Gene C. Hair II Regarding Attorney Fees In Mecklenburg County, North Carolina. (Case No. 19CVS011680-590, *Mary Woodson Gardner V. Gene C. Hair II*, Mecklenburg Superior Court, Filed 6/17/19)

Mecklenburg Superior Court

Case Summary

Case No. 19CVS011680-590

MARY WOODSON GARDNER VS GENE C HAIR, II

§
§

Location: Mecklenburg Superior Court
Filed on: 06/17/2019

Case Information

File Date 11/12/2019
Filed By HAIR, GENE C II
Filed Against GARDNER, MARY WOODSON
Cause of Action
CV - Attorney Fees
Description/Remedy
Counter Action
Counter Action - 2019-11-12

Case Type: General Civil Action
Case Status: 03/31/2023 Disposed - Other

Causes of Action

11/12/2019	Cause of Action CV - Attorney Fees (Counter Action - 2019-11-12) Filed By HAIR, GENE C II Filed Against GARDNER, MARY WOODSON Action Type Counter Action
06/17/2019	Cause of Action CV - Negligence - Other (Action - 2019-06-17) Filed By GARDNER, MARY WOODSON Filed Against HAIR, GENE C II Action Type Action
02/03/2021	Cause of Action CV - Other (LAUREN E. R. WATKINS WITHDRAW AS COUNSEL Action - 2021-02-0 Filed By GARDNER, MARY WOODSON Filed Against HAIR, GENE C II Action Type Action
06/17/2019	Cause of Action CV - Punitive Damages (Action - 2019-06-17) Filed By GARDNER, MARY WOODSON Filed Against HAIR, GENE C II Action Type Action
03/31/2023	Cause of Action CV - Other (ORDER FOR ADMINISTRATIVE CLOSURE Action - 2023-03-31) Filed By GARDNER, MARY WOODSON Filed Against HAIR, GENE C II Action Type Action
06/17/2019	Cause of Action CV - Intentional Torts (Action - 2019-06-17) Filed By GARDNER, MARY WOODSON Filed Against HAIR, GENE C II Action Type Action

(Case No. 19CVS011680-590, *Mary Woodson Gardner V. Gene C. Hair II*, Mecklenburg Superior Court, Filed 6/17/19)

- **In March 2023, An Order For Administrative Closure Was Filed Due To Inactivity Of Over Six Months And The Case Was Dismissed.** (Case No. 19CVS011680-590, *Mary Woodson Gardner V. Gene C. Hair II*, Mecklenburg Superior Court, Filed 3/31/23)

STATE OF NORTH CAROLINA
COUNTY OF MECKLENBURG

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

FILE NO. 19-CVS-011680

GARDNER, MARY, WOODSON

**ORDER FOR ADMINISTRATIVE
CLOSURE**

vs.

HAIR, GENE, C, II

THIS MATTER was commenced on 06/17/2019.

THIS MATTER has been ☒ inactive for over six months.
-OR-

☐ stayed as to the following party or parties:

THEREFORE, IT IS HEREBY ORDERED that this case shall be removed from the Court's active docket and closed for administrative and statistical purposes only. This administrative closure is without prejudice to previous orders entered herein and without prejudice to the filing of motions and orders in the future. Upon the filing of any document by any party including, if applicable, documentation showing that the matter is no longer stayed, the case shall be reopened and restored to the Court's active docket.

Date: 3/31/2023

Carla Archie

Carla Archie, Senior Resident Superior Court Judge

(Case No. 19CVS011680-590, *Mary Woodson Gardner V. Gene C. Hair II*, Mecklenburg Superior Court, Filed 3/31/23)

Restraining Order Complaint

Mary Woodson Gardner V. Harrison Paul Anderson II

In February 2001, Bradley Filed A Temporary Restraining Order Complaint Against Harrison Paul Anderson II In Routt County, Colorado. (Case No. 2001C-000030, *Mary Woodson Gardner V. Harrison Paul Anderson II*, Routt County Court, Filed 2/9/01)

Pa 31
2/14/01

County Court, Routt County, Colorado P. O. Box 773117 Steamboat Springs, Colorado 80477 Phone Number : (970) 879-5020 Plaintiff(s): Mary Woodson Gardner Date of Birth: 2/5/73 Defendant: Harrison Paul Anderson, II Date of Birth: 3/28/61	ROUTT COUNTY COMBINED COURT '01 FEB -9 P 4 53 COURT USE ONLY Case Number: 01C <u>30</u> Division Courtroom
VERIFIED COMPLAINT FOR RESTRAINING ORDER	

Plaintiff requests this court to issue a restraining order, and in support of this request states as follows:

1. I reside in the county of Routt, State of Colorado, and the defendant resides in the county of Harris, State of Texas. I know the defendant because he is a former boyfriend.

2. The minor children of the parties are (list names and dates of birth): None.

Name	DOB	Name	DOB
_____	_____	_____	_____
_____	_____	_____	_____

3. a) The most recent incident that causes me to ask for a restraining order occurred on or about (date) _____, at about (time) _____, when the defendant did the following to me and/or the above named children:
 There have been no incidents over the past two years, but only because of a "No Contact Order" entered in Case NO. 99M98 in the County Court of Routt County, Colorado. Previously, there is a lengthy history of physical abuse and a history of alcohol, cocaine use and steroid abuse by Mr. Anderson.

- b) Any other past incidents of violence or threats? (Be specific: What was the threat of violence? What was/were the act(s) of violence? Where did this occur? Were the minor children present?):

There were repeated violent incidents during the period from January 1997 through August, 1999. Mr. Anderson was arrested in August, 1999. Shortly after that date, he told me over the telephone that he would rather die than go to jail and that I would regret doing this to him. Mr. Anderson made similar remarks while in jail and specifically to Detective Glen Karst. Detective Karst can be reached at (303) 438-6473 and will corroborate this information.

- c) Are you aware of any other restraining orders currently in effect against either party? ☐ Yes ☒ No

If yes, please list any relevant information, such as the issuing court, state, and date of the order:

There is a "No Contact Order" provision in the Sentencing Order in Case No. 99M98 in the county Court of Routt County which expires on February 12, 2001.

4. I believe that I and/or the above named children are in imminent danger of: Harm to my/ life or health if the defendant is not restrained as requested.
5. I request that I be permitted to omit my address from this complaint because I fear that including my address will endanger me or the minor children.

6. I request the following relief from the court:

a) That the defendant be ordered to refrain from attacking, beating, molesting and verbally harassing me, following me, threatening my life, or threatening me with serious bodily injury.

That the defendant be ordered to have NO contact at all with me.

c) That the defendant be excluded from my home at (address): 33650 Routt County Road 14, Steamboat Springs, Colorado and 2535 Steamboat Blvd., Steamboat Springs, Colorado

d) That the defendant be ordered to stay at least 100 yards from wherever I am and from the following property: (address or description) 33650 Routt County Road 14, Steamboat Springs, Colorado and 2535 Steamboat Blvd., Steamboat Springs, Colorado and 509 Lincoln Avenue, Steamboat Springs, Colorado.

e) ☐ That the defendant be ordered to have no contact with the minor children listed above and that I be awarded temporary care and control of the children. OR

☐ That I be awarded temporary care and control of the children and that the defendant be given parenting time with the children as follows: _____

(If you request a restraining order and minor children are involved, you must fill out the form titled "Affidavit Regarding Children" under oath.)

f) ☐ Other: _____

I, the plaintiff, swear or affirm under penalty of perjury that the information contained in this verified complaint for restraining order is true and correct. I understand that once a restraining order is issued it cannot be changed by me or any other person without the permission of the court.


Mary Woodson Gardner, Plaintiff

STOP: IF YOU CHECKED BOX NUMBER 5, DO NOT FILL IN YOUR ADDRESS AND TELEPHONE NUMBER.

Plaintiff's Address _____

Telephone Number _____

Subscribed under oath before me on _____

My commission expires 11-19-03

Deputy Clerk/Notary Public _____

(Case No. 2001C-000030, *Mary Woodson Gardner V. Harrison Paul Anderson II*, Routt County Court, Filed 2/9/01)

- **Bradley Claimed Anderson Was Her Former Boyfriend And Had Committed “Repeated Violent Incidents During The Period From January 1997 Through August 1999.”** (Case No. 2001C-000030, *Mary Woodson Gardner V. Harrison Paul Anderson II*, Routt County Court, Filed 2/9/01)
- **In February 2001, The Temporary Restraining Order Was Approved.** (Case No. 2001C-000030, *Mary Woodson Gardner V. Harrison Paul Anderson II*, Routt County Court, Filed 2/12/01)

County Court, Routt County, Colorado P. O. Box 773117 Steamboat Springs, Colorado 80477 Phone Number : (970) 879-4567 Plaintiff(s)/Petitioner(s) and Address: Mary Woodson Gardner Defendant/Respondent and Address: Harrison Paul Anderson, II	COURT USE ONLY Case Number: 00000 <u>01230</u> Division _____ Courtroom _____
Ralph A. Cantafio, Esq. Cantafio & Hardy-Moore P. O. Box 774567, Steamboat Springs, CO 80477 Phone Number: (970) 879-4567 E-mail: cantafiohardymore@yahoo.com FAX Number: (970) 879-4511 Atty. Reg.#: 16280 The address of the protected party may be omitted from the written order of the Court, including the Register of actions.	
TEMPORARY CIVIL RESTRAINING ORDER (This form is subject to the provisions of C.R.S. 13-14-101 to 13-14-102)	

TO: Harrison Paul Anderson, II, Defendant
 Sex ☒ M ☐ F Race: White DOB: 3/28/81 Ht: 6'1" Wt: 185 Hair color: Brown Eye color: Green

The next hearing is March 6, 2001 (date) 1:15 pm (time) at the court address above.
 THE COURT FINDS that sufficient cause exists for the issuance of a civil restraining order.
 You shall not threaten, molest or injure the plaintiff or otherwise violate this order. A violation of a restraining order is a crime and may be prosecuted as a class 1 misdemeanor, municipal ordinance violation or a delinquent act (if committed by a juvenile) pursuant to CRS 18-6-803.5 and municipal ordinance.

1. *No Contact Provisions*
☒ It is ordered that you, the Defendant, shall have no contact of any kind with the Plaintiff(s), with the following exceptions:

☒ You must keep a distance of at least 100 yards from the Plaintiff(s).

2. *Exclusion from places*
 It is ordered that you be excluded from the following places: (Please specify address)

☒ Home: 33650 Routt County Road 14, Steamboat Springs, Colorado
☒ Work: 509 Lincoln Avenue, Steamboat Springs, Colorado
☐ School: _____
☒ Other: 2535 Steamboat Blvd., Steamboat Springs, Colorado
☐ Exceptions: _____

You may not remain in or return to any of the above locations after you receive this order. You shall be permitted to return to a shared residence one time to obtain sufficient undisputed personal effects to maintain a normal standard of living ONLY if you are accompanied at all times by a peace officer.

3. *Care and Control Provisions*
☐ It is in the best interest of the minor children named below that care and control of these children be awarded to: _____ until the next hearing. At that time, the court will determine who should receive temporary care and control of the minor children for up to 120 days.

Name: _____	DOB: _____
Name: _____	DOB: _____
Name: _____	DOB: _____
Name: _____	DOB: _____

A PEACE OFFICER SHALL USE REASONABLE MEANS TO EFFECTUATE THIS CARE & CONTROL ORDER.
 JDF 398 R11/99 Temporary Civil Restraining Order

4. *Issues Concerning Children*

☐ Parenting time (visitation) will be considered at the permanent orders hearing.

☐ Parenting time (visitation) shall be as previously ordered by the _____ District Court.
Case # _____

☐ You shall have no contact with the following minor children:

Name: _____	DOB: _____
Name: _____	DOB: _____
Name: _____	DOB: _____

5. *Other Provisions*

☐ It is further ordered that: _____

 _____
Judge/Magistrate Date Print Judge/Magistrate Name

WARNING: A violation of a restraining order may be a class 1 misdemeanor, municipal ordinance violation or a delinquent act (if committed by a juvenile). Anyone over the age of eighteen who violates this order may be subject to fines of up to \$5000 and up to 18 months in jail. Violation of this order will constitute contempt of court. A juvenile adjudicated may be subject to commitment to the Department of Human Services for up to two years. **You may be arrested or taken into custody** without notice if a law enforcement officer has probable cause to believe that you have violated this order. If you violate this order thinking that the other party or anyone else has given you permission, **you are wrong**, and can be arrested and prosecuted. The terms of this order cannot be changed by agreement of the parties. Only the court can change this order.

NOTICE TO DEFENDANT: YOU ARE DIRECTED TO APPEAR BEFORE THIS COURT ON THE DATE SHOWN ON THE FRONT OF THIS FORM TO SHOW CAUSE, IF ANY EXISTS, WHY THIS TEMPORARY RESTRAINING ORDER SHOULD NOT BE MADE PERMANENT. YOU ARE FURTHER ADVISED THAT IF YOU FAIL TO APPEAR AT COURT IN ACCORDANCE WITH THE TERMS OF THIS ORDER, A WARRANT MAY BE ISSUED FOR YOUR ARREST. IF THIS ORDER IS TO PREVENT DOMESTIC ABUSE, THIS TEMPORARY RESTRAINING ORDER SHALL BE MADE PERMANENT WITHOUT FURTHER NOTICE OR SERVICE. YOU ARE NOTIFIED THAT THE PERMANENT RESTRAINING ORDER SHALL REMAIN IN EFFECT UNTIL FURTHER ORDER OF THE COURT. SUCH PERMANENT ORDER WILL SUBJECT YOU TO FEDERAL LAW RESTRICTING FIREARMS POSSESSION AND SALE [18 U.S.C.A. 922(g)].

NOTICE TO PLAINTIFF: YOU ARE HEREBY INFORMED THAT IF THIS ORDER IS VIOLATED YOU MAY CALL THE POLICE, INITIATE CONTEMPT PROCEEDINGS AGAINST THE RESTRAINED PERSON IF THE ORDER IS ISSUED IN A CIVIL ACTION OR REQUEST THE PROSECUTING ATTORNEY TO INITIATE CONTEMPT PROCEEDINGS IF THE ORDER IS ISSUED IN A CRIMINAL ACTION.

NOTICE TO PEACE OFFICERS: You shall use every reasonable means to enforce this restraining order. You shall arrest or take into custody, or if an arrest would be impractical under the circumstances, seek a warrant for the arrest of the restrained person when you have information amounting to probable cause that the restrained person has violated or attempted to violate any provision of this order subject to criminal sanctions pursuant to CRS 18-6-803.5 or municipal ordinance and the restrained person has been properly served with a copy of the restraining order or the restrained person has received actual notice of the existence and substance of such order. You shall enforce this order even if there is no record of it in the Restraining Order Central Registry. You shall take the restrained person to the nearest jail or detention facility. You are authorized to use every reasonable effort to protect the alleged victim and the alleged victim's children to prevent further violence. You may transport, or arrange transportation to a shelter for the alleged victim and/or the alleged victim's children.

JDF 398 R11/99 Temporary Civil Restraining Order

(Case No. 2001C-000030, *Mary Woodson Gardner V. Harrison Paul Anderson II*, Routt County Court, Filed 2/12/01)

- **In March 2001, The Case Was Dismissed Without Prejudice And The Temporary Restraining Order Was Vacated.** (Case No. 2001C-000030, *Mary Woodson Gardner V. Harrison Paul Anderson II*, Routt County Court, Filed 3/6/01)

Register of Action Worksheet

Case #: 2001C -000030 Division: A

Civil/Small Claims

GARDNER, MARY WOODSON

County Court, Routt County
State of Colorado
GARRECHT, JAMES HERBERT

Vs.

ANDERSON, HARRISON PAUL II

NATURE OF ACTION

- ☐ Money Demand
☐ FED
☐ Name Change
☐ Other
☒ Restraining Order

Plaintiffs Attorney

Summons Filed	_____	Return Date	3/06/2001 ✓
Complaint Filed	_____	Continued to	_____
Return Filed	_____	Trial Date	_____
Alias Summons Entered	_____	Continued to	_____
Answer/Counter	_____	Continued to	_____
Counter Claim Filed	_____		
Case Closed	_____		

FISCAL DATA

Tax and _____
 Filing Fee 31.00
 Answer Fee \$ _____
 Process Fee \$ _____
 Jury Fee \$ _____
 Other \$ _____

PRE-TRIAL/TRIAL ACTIVITY

- ☐ Judgment for Possession
☒ Dismissed without Prejudice Reason TD - A FTA
☐ Dismissed with Prejudice
☐ Default Date: _____
☐ Default Judgment \$ _____ Plus Costs: \$ _____
☐ Plus Attorney Fees \$ _____ Plus Interest: _____

Trial to: _____ Court Jury of _____
 After hearing and considering the testimony, evidence, and
 authorities the Court _____ Jury finds, and the court enters
 judgement in favor of: _____

and against _____

For \$ _____ Plus Costs: \$ _____
 Plus Attorney Fees \$ _____ Plus Interest: _____

Date: 3/6/01 Judge/Magistrate: J. M. Garrecht

PROCEEDINGS

3-6-01 TRO vacated - parties FTA'd ✓

(Case No. 2001C-000030, Mary Woodson Gardner V. Harrison Paul Anderson II, Routt County Court, Filed 3/6/01)

BUSINESS RECORDS

Mary Woodson Gardner Bradley is the current registered agent of the North Carolina-domiciled limited liability company Snooty Falooty LLC, which Bradley has operated since January 2022; the company is currently active to date. Bradley is also the former registered agent of at least two North Carolina-domiciled limited liability companies: W. Gardner Services, Inc. and Clay Hair Motorsports, Inc.; both companies are currently dissolved. Additionally, in November 2008, Bradley incorporated Southern Nevada Consulting Group, LLC as a Nevada-domiciled foreign limited liability company; in September 2010, the company's registration to operate in the state of North Carolina was revoked for failing to file their annual report.

Snooty Falooty LLC

In January 2022, Bradley Incorporated Snooty Falooty LLC As A Domestic Limited Liability Company With The North Carolina Secretary Of State. (North Carolina Secretary Of State, Filed 1/27/22)

State of North Carolina
Department of the Secretary of State

SOSID: 2344695
Date Filed: 1/27/2022 8:03:00 AM
Elaine F. Marshall
North Carolina Secretary of State
C2022 026 02486

Limited Liability Company
ARTICLES OF ORGANIZATION

Pursuant to §57D-2-20 of the General Statutes of North Carolina, the undersigned does hereby submit these Articles of Organization for the purpose of forming a limited liability company.

1. The name of the limited liability company is: Snooty Falooty LLC
(See Item 1 of the Instructions for appropriate entity designation)
2. The name and address of each person executing these articles of organization is as follows: (State whether each person is executing these articles of organization in the capacity of a member, organizer or both by checking all applicable boxes.) **Note: This document must be signed by all persons listed.**

Name	Business Address	Capacity
<u>Mary Woodson Bradley</u>	<u>- 11506 James Jack Lane Charlotte NC, 28277-3746 United States</u>	☒ Member ☐ Organizer
_____	_____	☐ Member ☐ Organizer
_____	_____	☐ Member ☐ Organizer
3. The name of the initial registered agent is: Mary Woodson Bradley
4. The street address and county of the initial registered agent office of the limited liability company is:
 Number and Street 11506 James Jack Ln
 City Charlotte State: NC ZipCode: 28277-3746 County: Mecklenburg
5. The mailing address, if different from the street address, of the initial registered agent office is:
 Number and Street _____
 City _____ State: NC ZipCode: _____ County: _____

(North Carolina Secretary Of State, Filed 1/27/22)

- **The Company Is Currently Active To Date.** (North Carolina Secretary Of State, Accessed 4/11/24)

Clay Hair Motorsports, Inc.

In June 2005, Bradley Incorporated Clay Hair Motorsports, Inc. As A Domestic Limited Liability Company With The North Carolina Secretary Of State. (North Carolina Secretary Of State, Filed 6/13/05)

SOSID: 786951
Date Filed: 6/13/2005 1:52:00 PM
Elaine F. Marshall
North Carolina Secretary of State
C200516000132

**ARTICLES OF INCORPORATION
OF
Clay Hair Motorsports, Inc.**

Pursuant to N.C.G.S. § 55-2-02, the undersigned incorporator does hereby submit these articles of incorporation for the purpose of forming a business corporation.

ARTICLE I

The name of the corporation shall be Clay Hair Motorsports, Inc.

ARTICLE II

The corporation shall have the power to engage in any lawful activity for which corporations may be organized under the North Carolina Business Corporation Act.

ARTICLE X

The number of directors of the corporation shall be fixed by the bylaws of the corporation. The initial Board of Directors shall consist of 2 directors, whose names and addresses are as follows:

Mary W. Gardner
2100 Stevens Church Road
Mt. Pleasant, NC 28124

Clay Hair
2100 Stevens Church Road
Mt. Pleasant, NC 28124

ARTICLE XI

The street address of the initial registered office of the corporation is 2100 St. Stephens Church Road, Mt. Pleasant, North Carolina 28124. The name of the initial registered agent at that address is Mary W. Gardner.

The initial business address for the corporation is 2100 St. Stephens Church Road, Cabarrus County, Mt. Pleasant, NC 28124 and the mailing address will be 2100 Stephens Church Road, Mt. Pleasant, NC 28124.

The principal place of business is 2100 St. Stephens Church Road, Cabarrus County, Mt. Pleasant, NC 28124.

ARTICLE XII

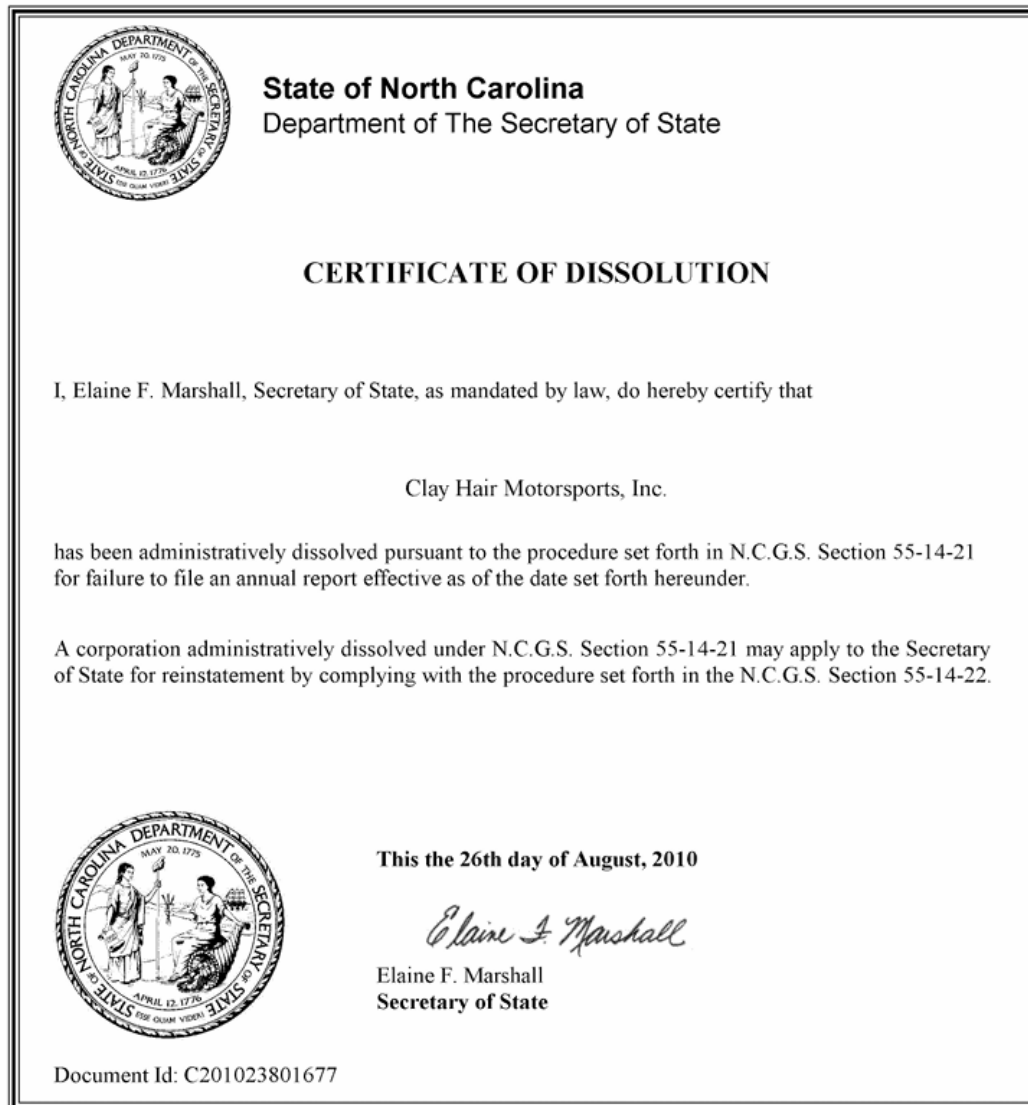
The principal place of business and mailing address of this corporation shall be 2100 St. Stephens Church Road, Cabarrus County, Mt. Pleasant, North Carolina 28124.

ARTICLE XIII

The name and address of the incorporator to these Articles of Incorporation is Mary W. Gardner, 2100 St. Stephens Church Road, Mt. Pleasant, NC 28124.

(North Carolina Secretary Of State, Filed 6/13/05)

- **In August 2010, The Company Was Administratively Dissolved.** (North Carolina Secretary Of State, Filed 8/26/10)



(North Carolina Secretary Of State, Filed 8/26/10)

W. Gardner Services, Inc.

In July 2004, Bradley Incorporated W. Gardner Services, Inc. As A Domestic Limited Liability Company With The North Carolina Secretary Of State. (North Carolina Secretary Of State, Filed 7/20/04)

State of North Carolina Department of the Secretary of State ARTICLES OF INCORPORATION Pursuant to §55-2-02 of the General Statutes of North Carolina, the undersigned does hereby submit these Articles of Incorporation for the purpose of forming a business corporation. 1. The name of the corporation is: <u>W. GARDNER SERVICES, INC.</u> 2. The number of shares the corporation is authorized to issue is: <u>100,000</u> 3. These shares shall be: <i>(check either a or b)</i> a. ☒ all of one class, designated as common stock; or b. ☐ divided into classes or series within a class as provided in the attached schedule, with the information required by N.C.G.S. Section 55-6-01. 4. The street address and county of the initial registered office of the corporation is: Number and Street <u>2100 ST STEPHENS CHURCH RD.</u> City <u>MT. PLEASANT</u> State <u>NC</u> Zip Code <u>28124</u> County <u>CABARRUS</u> 5. The mailing address, <i>if different from the street address</i>, of the initial registered office is: Number and Street <u>P.O. BOX 895</u> City <u>CONCORD</u> State <u>NC</u> Zip Code <u>28026</u> County <u>CABARRUS</u> 6. The name of the initial registered agent is: <u>MARY W. GARDNER</u> 7. Principal office information: <i>(must select either a or b.)</i> a. ☒ The corporation has a principal office. The street address and county of the principal office of the corporation is: Number and Street <u>2100 ST. STEPHENS CHURCH RD.</u> City <u>MT. PLEASANT</u> State <u>NC</u> Zip Code <u>28124</u> County <u>CABARRUS</u> The mailing address, <i>if different from the street address</i>, of the principal office of the corporation is: Number and Street <u>P.O. BOX 895</u> City <u>CONCORD</u> State <u>NC</u> Zip Code <u>28026</u> County <u>CABARRUS</u> b. ☐ The corporation does not have a principal office.	SOSID: 735000 Date Filed: 7/20/2004 11:20:00 AM Elaine F. Marshall North Carolina Secretary of State C200419800282
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(North Carolina Secretary Of State, Filed 7/20/04)

- **In December 2021, The Company Was Dissolved.** (North Carolina Secretary Of State, Filed 12/21/21)

SOSID: 0735000
 Date Filed: 12/21/2021 9:58:00 AM
 Elaine F. Marshall
 North Carolina Secretary of State
C2021 355 07401

State of North Carolina
 Department of the Secretary of State

**ARTICLES OF DISSOLUTION BY BOARD OF DIRECTORS AND SHAREHOLDERS
 BUSINESS CORPORATION**

Pursuant to §55-14-03 of the General Statutes of North Carolina, the undersigned corporation hereby submits the following Articles of Dissolution for the purpose of dissolving the corporation:

1. The name of the corporation is: W. Gardner Services, Inc.
2. The names and business addresses of the directors the corporation are:
Mary Woodson Gardner
11506 James Jack Ln
Charlotte, NC 28277
3. The names, titles, and business addresses of the officers of the corporation are:
Mary Woodson Gardner - President
11506 James Jack Ln
Charlotte, NC 28277
4. The dissolution of the corporation was authorized on the 9 day of December, 2021.
5. Shareholder approval for the dissolution was obtained as required by Chapter 55 of the North Carolina General Statutes.
6. These articles will be effective upon filing, unless a delayed date and/or time is specified: _____

This the 9 day of December, 2021.

W. Gardner Services, Inc.
 Name of Corporation
Mary Woodson Gardner
 Signature
Mary Woodson Gardner - President
 Type or Print Name and Title

(North Carolina Secretary Of State, Filed 12/21/21)

Southern Nevada Consulting Group, LLC

In November 2008, Bradley Incorporated Southern Nevada Consulting Group, LLC As A Foreign Limited Liability Company Registered In The State Of Nevada With The North Carolina Secretary Of State. (North Carolina Secretary Of State, Filed 11/25/08)

SOSID: 1073189
 Date Filed: 11/25/2008 9:04:00 AM
 Elaine F. Marshall
 North Carolina Secretary of State
 C200832900522

State of North Carolina
 Department of the Secretary of State

APPLICATION FOR CERTIFICATE OF AUTHORITY
 FOR LIMITED LIABILITY COMPANY

Pursuant to §57C-7-04 of the General Statutes of North Carolina, the undersigned limited liability company hereby applies for a Certificate of Authority to transact business in the State of North Carolina, and for that purpose submits the following:

1. The name of the limited liability company is SOUTHERN NEVADA CONSULTING GROUP, LLC;

and if the limited liability company name is unavailable for use in the State of North Carolina, the name the limited liability company wishes to use is _____

2. The state or country under whose laws the limited liability company was formed is: NEVADA

3. The date of formation was 11-22-2006; its period of duration is: PERPETUAL

4. Principal office information: (Select either a or b.)

a. ☒ The limited liability company has a principal office.

The street address and county of the principal office of the limited liability company is:

Number and Street 2101 E GOLD HILL ROAD
 City, State, Zip Code MT PLEASANT, NC 28124 County CABARRUS

The mailing address, if different from the street address, of the principal office of the corporation is:

b. ☐ The limited liability company does not have a principal office.

5. The street address and county of the registered office in the State of North Carolina is:

Number and Street 2101 E GOLD HILL ROAD
 City, State, Zip Code MT PLEASANT, NC 28124 County CABARRUS

6. The mailing address, if different from the street address, of the registered office in the State of North Carolina is:

7. The name of the registered agent in the State of North Carolina is: WOODSON GARDNER

(North Carolina Secretary Of State, Filed 11/25/08)

- In September 2010, The Company's Registration To Operate In The State Of North Carolina Was Revoked For Failing To File Their Annual Report. (North Carolina Secretary Of State, Filed 9/2/10)

NOTICE TO REGISTERED AGENT:

Under N.C.G.S. Section 55D-30(b), it is the duty of the registered agent to forward this certificate to the business entity at the last known address.

SOUTHERN NEVADA CONSULTING GROUP, LLC (1073189)
2101 East Gold Hill Road
Mount Pleasant, NC 28124

	State of North Carolina Department of The Secretary of State
CERTIFICATE OF REVOCATION OF REGISTRATION	
I, Elaine F. Marshall, Secretary of State, as mandated by law, do hereby certify that the registration of	
SOUTHERN NEVADA CONSULTING GROUP, LLC	
to transact business in the state of North Carolina has been revoked pursuant to the procedures set forth in N.C.G.S. Section 57C-7-14(a)(2) for failure to file an annual report effective as of the date set forth hereunder.	
Foreign Limited Liability Company revoked under N.C.G.S. Section 57C-7-14(b) may appeal the Secretary of State's revocation of its certificate of authority under the same procedures that a foreign corporation may appeal the revocation of its certificate of authority pursuant to N.C.G.S. Section 55-15-32 and Section 55-15-33.	
	This the 2nd day of September, 2010 <i>Elaine F. Marshall</i> Elaine F. Marshall Secretary of State
Document Id: C201024524546	

(North Carolina Secretary Of State, Filed 9/2/10)

NON-PROFIT RECORDS

NOTE: No non-profit records could be found for Mary Woodson Gardner Bradley.

PROFESSIONAL & RECREATIONAL LICENSES

Mary Woodson Gardner Bradley has been a registered real estate broker licensed to operate in the state of North Carolina since October 19, 2016. (Note: Bradley has also been licensed to operate as a real estate broker in the states of South Carolina and Colorado).

Of note, in July 2018, Clay Hair filed a complaint with the North Carolina Real Estate Commission alleging Bradley “used documents that have been overlaid altered and forged to obtain loans and or moneys.” (Note: No additional actions related to the complaint appear to have been listed).

Real Estate Broker

North Carolina

According To The North Carolina Real Estate Commission, Bradley Has Been A Registered Real Estate Broker Licensed To Operate In The State Of North Carolina Since October 19, 2016. ([North Carolina Real Estate Commission](#), Accessed 4/10/24)

BRADLEY, MARY WOODSON GARDNER
10612D PROVIDENCE RD # 519
CHARLOTTE, NC 28277-0233

License: 202549
Issue Date: 10/19/2016
Name: BRADLEY, MARY WOODSON GARDNER
Type: BROKER
Level: B
Status: ACTIVE
Primary Firm: **C27737** CAROLINA PREMIER REAL ESTATE GROUP LLC
Firm may also operate under a trade name. Click firm license number to view possible trade names.
Broker-In-Charge: PHIPPS, CURTIS BERNIE
BIC Eligible: Yes

([North Carolina Real Estate Commission](#), Accessed 4/10/24)

NOTE: *Bradley has also been licensed to operate as a real estate broker in the states of South Carolina and Colorado.*

In July 2018, Clay Hair Filed A Complaint With The North Carolina Real Estate Commission Alleging Bradley “Used Documents That Have Been Overlaid Altered And Forged To Obtain Loans And Or Moneys.” (Complaint, North Carolina Real Estate Commission, Filed 7/3/18, North Carolina Public Records Request, Filled 4/2/24)



OFFICE USE	
File #	019 0012
Order ID	A9437-766713-180703224251

NORTH CAROLINA REAL ESTATE COMMISSION
P.O. Box 17100 Raleigh, N.C. 27619-7100
Phone (919) 875-3700 • Email: ra@ncrec.gov
Website: www.ncrec.gov

COMPLAINT

INSTRUCTIONS

1. This form should be used when filing a complaint with the North Carolina Real Estate Commission against a real estate broker or a time share project (hereinafter "licensee").
2. Please fill in the information requested below. Then answer the questions and state your complaint on page two of this form.
3. **Your complaint will become a public record, and a copy of it will be given to the real estate licensee complained against.**
4. Persons who file complaints must be willing to appear as a witness, be sworn, testify and be cross-examined concerning the allegations made in their complaints.

IMPORTANT

The Real Estate Commission investigates complaints against real estate licensees accused of misconduct. If the Commission finds that real estate licensees have violated the Real Estate License Law or Commission rules, it can suspend or revoke their licenses.

The Real Estate Commission cannot give legal advice or act as your attorney. The Commission cannot assist in resolving disputes involving such matters as quality of workmanship of construction or the payment of real estate brokerage fees. The Commission cannot order monies to be paid or refunded to you or contracts to be canceled. If you have these types of problems, you should consult your attorney.

TYPE OR PRINT CLEARLY IN INK

Clay Hair

clayhair1@gmail.com

Your full name (Identifies you as Complaining Witness)

Email Address

2100 St. Stephens Ch. Rd. Mt. Pleasant NC 28124

704-436-2037

Mailing Address (Street, City, State, Zip code)

Home Phone

980-622-0210

Cell Phone

REAL ESTATE LICENSEE(S) COMPLAINED AGAINST

BROKER #1

Licensee's Name Woodson Gardner

Company Name EXP Reality

Company Address 8593 Blue Heron Drive

City, State, Zip Terrell NC 28682

BROKER #2 (IF ANY)

Licensee's Name

Company Name

Company Address 2100 St. Stephens Ch. Rd.

City, State, Zip Mt. Pleasant NC 28124

DO NOT WRITE IN THIS SPACE

202549

Have you hired or consulted an attorney regarding your complaint? ☐ Yes ☒ No

If "Yes" give name _____

Is there a pending or completed lawsuit regarding your complaint? ☐ Yes ☒ No

When did this event occur? 09/16/2016

Where did this event occur? Mt. Pleasant

Provide a detailed written statement of the full essentials of your complaint. Be factual. **Furnish copies of all documents pertaining to your complaint (contracts, letters, etc.), retaining the originals for your files.** Include the name, address, and telephone number of any witness(es) to the transaction in question. Attach additional sheets if necessary. PLEASE TYPE OR PRINT LEGIBLY.

Woodson Gardner has used Documents that have been overlaid altered and forged to obtain loans and or moneys.

The undersigned hereby swears or affirms that the foregoing statement and the attachments hereto are true.

Clayton Hair

Signature of Complaining Witness

07-02-2018

Date

(Complaint, North Carolina Real Estate Commission, Filed 7/3/18, North Carolina Public Records Request, Filed 4/2/24)

NOTE: No additional actions related to the complaint appear to have been listed.

PERSONAL FINANCIAL DISCLOSURE

On her 2024 Statement of Economic Interest, Mary Woodson Gardner Bradley declared she was self-employed as a realtor, along listing she and her spouse receive income from Ballantyne Insurance Group. Bradley also declared she held business interests as president of Snooty Falooty and her spouse held business interests as president of Ballantyne Insurance Group. Bradley then disclosed she and her spouse held joint ownership of three real properties and one rental property in the state of North Carolina, along with disclosing they had purchased a single-family home in 2022 or 2023 with a market value of \$10,000 or more. Additionally, Bradley declared her spouse owned financial holdings valued at \$10,000 or more in four companies: Apple, Microsoft, The Walt Disney Company, and Novo Norvisk ASADR. Moreover, Bradley listed Commercial Bank as a creditor whom she owed a liability of \$10,000 or more to. Bradley then declared she held no relationships or positions with a nonprofit organization operating in the state of North Carolina and had received no gifts or scholarships.

2024 Statement Of Economic Interest

Employment

In 2024, Bradley Declared She Was Self-Employed As A Realtor. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

Filer's Name (First, Middle, Last)				
Prefix	First Name	Middle Name	Last Name	Suffix
Mrs.	MARY	WOODSON	BRADLEY	
Current Employer			Job Title	
Self Employed			REALTOR	
Nature or Type of Business				
Real Estate				

(2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

Income

In 2024, Bradley Declared She Received Income From Ballantyne Insurance Group. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

In 2024, Bradley Declared Her Spouse Received Income From Ballantyne Insurance Group. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

6. List each source of income (<i>not specific monetary amounts</i>) of more than \$5,000 received by you or any members of your immediate family during 2023. Include salary, wages, state/local government retirement income, professional fees, honoraria, interest, dividends, rental income, business income, and any other types of income required to be reported on your State <i>and/or</i> federal income tax returns. • Attention! You must disclose salary or wages received from any governmental or private entity, including employers that you may have already listed in response to other SEI questions. • Do not attach tax returns. • Do not include income received from the following sources: capital gains; federal government or military retirement benefits; or Social Security retirement, survivors, or disability benefits.			
Recipient of Income	Name of Person or Entity from Which Income Was Received	Type of Business/ Industry	Type of Income
☐ I had no reportable income over \$5,000 in 2023.			
WILLIAM BRADLEY	BALLANTYNE GROUP ^{INSURANCE}	RL INSURANCE	SALARY
MARY WOODSON BRADLEY	BALLANTYNE GROUP ^{INSURANCE}	INSURANCE	SALARY

(2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

Business Interests

In 2024, Bradley Declared She Held Business Interests As President Of Snooty Falooty.

(2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

In 2024, Bradley Declared Her Spouse Held Business Interests As President Of Ballantyne Insurance Group. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

9(a). As of December 31, 2023, were you or a member of your immediate family an employee, director, partner, officer, proprietor, or member or manager of a for profit business?			
Name of Person	Relationship to Filer	Name of Company	Role of Person
☒ Yes ☐ No - If "No," proceed to question 10.			
WILLIAM BRADLEY	SPOUSE	BALLANTYNE ^{INSURANCE} GROUP	PRESIDENT
MARY WOODSON BRADLEY	SELF	SNOUTY FALOOTY	PRESIDENT
9(b). If you know that any entity listed in 9(a) above had any material business dealings or business contracts with the State of North Carolina or was regulated by the State as of December 31, 2023, briefly describe that activity.			
Name of Company or Business Entity		Description of Business Activity with the State	
☒ None or Not Known			

(2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

Property Interests

In 2024, Bradley And Her Spouse Declared Joint Ownership Of Three Real Properties In The State Of North Carolina. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

In 2024, Bradley And Her Spouse Declared Ownership Of One Rental Property In Watauga County, North Carolina. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

In 2024, Bradley And Her Spouse Declared They Purchased A Single-Family Home In 2022 Or 2023 With A Market Value Of \$10,000 Or More. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

Property Interests			
1. As of December 31, 2023, did you or any members of your immediate family:			
A. have an ownership interest in North Carolina real estate (including your residence) with a market value of \$10,000 or more?			
☒ Yes ☐ No			
Owner of Real Estate	% Ownership Interest	Location by City	Location by County
WILLIAM & MARY BRADLEY	50/50	CHARLOTTE	MECKLENBURG
WILLIAM & MARY BRADLEY	50/50	BLOWING ROCK	WATAUGA
WILLIAM & MARY BRADLEY	50/50	BLOWING ROCK	WATAUGA
B. lease or rent real estate or personal property to or from the State of North Carolina with a market value of \$10,000 or more?			
☒ Yes ☐ No			
Name of Lessor	Name of Lessee (Renter)	If Real Estate, Location by City & County	If Personal Property, Describe
WILLIAM BRADLEY	MARILYN MEYER	BLOWING ROCK WATAUGA CO.	
2. At any time during 2022 or 2023, did you or any members of your immediate family sell or buy personal property to or from the State of North Carolina with a market value of \$10,000 or more?			
☒ Yes ☐ No			
Name of Purchaser	Name of Seller	Type of Property	
WILLIAM & MARY BRADLEY	MARILYN MEYER	SINGLE FAMILY HOME	

(2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

Financial Interests

In 2024, Bradley Declared Her Spouse Owned Financial Holdings Valued At \$10,000 Or More In Apple Inc. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

In 2024, Bradley Declared Her Spouse Owned Financial Holdings Valued At \$10,000 Or More In The Walt Disney Company. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

In 2024, Bradley Declared Her Spouse Owned Financial Holdings Valued At \$10,000 Or More In Microsoft Corp. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

In 2024, Bradley Declared Her Spouse Owned Financial Holdings Valued At \$10,000 Or More In Novo Norvisk ASADR. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

Financial Interests	
3. As of December 31, 2023, did you or any members of your immediate family own any of the following financial interests valued at \$10,000 or more? A. Stock in a publicly owned company? ☒ Yes ☐ No	
List the name of each company in which you own holdings of \$10,000 or more. Do not list the number of shares/options, or the value of your holdings. ► Include stocks held individually or in a portfolio managed by a financial services company. ► Do <u>not</u> list interests in a widely held investment fund (including mutual funds, regulated investment companies, or pension or deferred compensation plans) if: 1. the fund is publicly traded, or its assets are widely diversified; and 2. neither you nor an immediate family member are able to control the fund's assets.	
Owner of Interest	Full Name of Company or ticker symbol
WILLIAM BRADLEY	APPLE INC.
WILLIAM BRADLEY	WALT DISNEY CO.
WILLIAM BRADLEY	MICROSOFT CORP.
WILLIAM BRADLEY	NOVO NORVISK ASADR
B. Stock options in a company or business? ☐ Yes ☒ No	
Owner of Stock Option	Full Name of Company or ticker symbol
C. Interests in a non-publicly owned company or business entity. These include interests in sole partnerships, limited partnerships, joint ventures, limited liability companies, limited liability partnerships, and closely held corporations. ☐ Yes ☒ No - If "No," proceed to question 4.	
Owner of Interest	Name of Company or Business Entity
C (1). For each company or business entity identified in question 3.C. (the "primary company"), please list the names of any other companies or business entities in which the primary company owns securities or equity interests valued at over \$10,000, if known.	
Non-Publicly Owned Company or Business Entity (the Primary Company listed in 3.C.)	Other Companies in which the Primary Company Owns Security or Equity Interests
☒ None or not known	

(2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

Liabilities

In 2024, Bradley Declared Commercial Bank As A Creditor Whom She Owed A Liability Of \$10,000 Or More To. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

5. As of December 31, 2023, did you any members of your immediate family have liabilities of \$10,000 or more, excluding the mortgage on your primary personal residence? Examples include credit card debts, auto loans, student loans, personal loans, and intra-family debt. ☒ Yes ☐ No	
Name of Debtor	List Type of Creditor (e.g., "commercial bank," "credit union," "individual," etc.)
MARY WOODSON BRADLEY	COMMERCIAL BANK

(2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

Professional And Civic Relationships

In 2024, Bradley Declared She Held No Relationships Or Positions With A Nonprofit Corporation Or Organization Operating In The State Of North Carolina. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

Professional and Civic Relationships			
7(a). During 2023, were you or any members of your immediate family a director, officer, governing board member, employee, independent contractor, or registered lobbyist of a nonprofit corporation or organization operating in North Carolina primarily for religious, charitable, scientific, literary, public health and safety, or educational purposes? ☐ Yes ☒ No - If "No," proceed to question 8.			
▶ Do not list State boards or entities. ▶ Do not list organizations of which you are a mere member.			
Name of Person	Position	Name of Nonprofit Corporation or Organization	Nature or Purpose of Organization
7(b). If the nonprofit corporations or organizations listed above do business with the State of North Carolina or receive State funds, briefly describe the nature of that business, if known or with due diligence could reasonably be known.			
Name of Nonprofit Corporation or Organization		Describe State Business	
☒ None or Not Known			

(2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

Gifts

In 2024, Bradley Declared She Had Received No Gifts. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

Other Disclosures			
14. During 2023, after you were appointed, employed, or filed or were nominated as a candidate, did you - receive any "gift(s)" exceeding \$200 per quarter from a person or group of persons acting together, - when both you and those person(s) were outside North Carolina, - under circumstances that would lead a reasonable person to conclude the gifts were given for lobbying? To answer Yes, all three conditions must apply. ☐ Yes ☒ No ▶ Do not report gifts given by members of your extended family. ▶ Do not report gifts you have previously reported on the "Expense Report for Exempted Persons."			
Date Item Received	Name and Address of Donor(s)	Describe Item Received	Estimated Market Value

(2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

In 2024, Bradley Declared She Had Received No Scholarships. (2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

15. During 2023, after you were appointed, employed, or filed or were nominated as a candidate, did you - accept a "scholarship" exceeding \$200 related to your public position from a person or group of persons acting together - when those person(s) were outside North Carolina? To answer Yes, both conditions must apply. A "scholarship" is a grant-in-aid, either direct or indirect, to attend a conference, meeting, or similar event, including travel, lodging, meals, and other similar expenses. ☐ Yes ☒ No ☐ Judicial Officer - You are not required to complete this question if you are filing solely as a judicial officer or a judicial officer candidate or appointee. ▶ Do not report gifts you have previously reported on the "Reportable Expenditure Made by Person Exempted." ▶ Legislators are not required to report scholarships paid by a nonpartisan legislative organization of which the legislator or the Assembly is a member, participant, or affiliate.			
Date of Scholarship	Name and Address of Donor(s)	Describe Event	Estimated Market Value

(2024 Statement Of Economic Interest, [North Carolina State Ethics Commission](#), Filed 1/20/24)

BRADLEY’S PERSONAL AND PROFESSIONAL SCANDALS

BRADLEY HAS MADE CLAIMS SHE HAS SPENT HER ENTIRE LIFE DEDICATED TO PUBLIC SERVICE

On Her Campaign Site, Bradley Claims Her “Entire Life Has Been Dedicated To Public Service, Volunteerism, Advocacy, And Being A Community Leader”

On Her Campaign Site, Bradley Claims Her “Entire Life Has Been Dedicated To Public Service, Volunteerism, Advocacy, And Being A Community Leader.” “Woodson is a mom, wife, business owner, community leader, and tireless volunteer. She is the daughter of a career public school teacher and social worker who went on to work in the Juvenile Court System. Community Service is how she grew up, who she is now, and what her new family is known for. Her entire life has been dedicated to public service, volunteerism, advocacy, and being a community leader. Woodson graduated from Hollins University in 1995 with a degree in Economics and Business Administration. She also studied Environmental Economics abroad at the University of Sydney in Australia and worked as an elementary teacher through a Rotary Service Project in Lucea Bay, Jamaica. She understands the importance of business growth and public service and more importantly, why they should go hand-in-hand.” ([Woodson Bradley](#), Accessed 4/10/24)

W H O I S W O O D S O N ?

Woodson is a mom, wife, business owner, community leader, and tireless volunteer. She is the daughter of a career public school teacher and social worker who went on to work in the Juvenile Court System. Community Service is how she grew up, who she is now, and what her new family is known for. Her entire life has been dedicated to public service, volunteerism, advocacy, and being a community leader.

Woodson graduated from Hollins University in 1995 with a degree in Economics and Business Administration. She also studied Environmental Economics abroad at the University of Sydney in Australia and worked as an elementary teacher through a Rotary Service Project in Lucea Bay, Jamaica. She understands the importance of business growth and public service and more importantly, why they should go hand-in-hand.

([Woodson Bradley](#), Accessed 4/10/24)

“Woodson Has Dedicated Her Life To Public And Community Service”

“Woodson Has Dedicated Her Life To Public And Community Service.” “Woodson has dedicated her life to public and community service. She's running to bring that record of public and community service to the NC Senate District 42. She is also Mecklenburg County Democratic Precinct Chair for Precinct 140. She is a domestic violence survivor and advocate for families, children, and teens across NC. She currently speaks for the Mecklenburg County Domestic Violence Speakers Bureau. Woodson speaks in CMS schools for teen dating violence

prevention for Love Speaks Out. She's on the planning board as a survivor voice for the Mecklenburg County Family Justice Center, known as the Umbrella Center. She has appeared in Public Service Announcements and videos for Safe Alliance, and has been featured in social media for Jamie Kimble Foundation For Courage. Woodson is a vibrant and active member of the Rotary Club of Charlotte. She serves on various Rotary Committees and is an ambassador for volunteer opportunities across Charlotte. She regularly volunteers loading teachers' cars with supplies at Classroom Central. She has planted trees across our county with Trees for Charlotte, and served Christmas Breakfast with her family at the Charlotte Rescue Mission.” ([Woodson Bradley](#), Accessed 4/10/24)

A R E C O R D O F S E R V I C E

Woodson has dedicated her life to public and community service. She's running to bring that record of public and community service to the NC Senate District 42. She is also Mecklenburg County Democratic Precinct Chair for Precinct 140.

She is a domestic violence survivor and advocate for families, children, and teens across NC. She currently speaks for the Mecklenburg County Domestic Violence Speakers Bureau. Woodson speaks in CMS schools for teen dating violence prevention for Love Speaks Out. She's on the planning board as a survivor voice for the Mecklenburg County Family Justice Center, known as the Umbrella Center. She has appeared in Public Service Announcements and videos for Safe Alliance, and has been featured in social media for Jamie Kimble Foundation For Courage.

Woodson is a vibrant and active member of the Rotary Club of Charlotte. She serves on various Rotary Committees and is an ambassador for volunteer opportunities across Charlotte. She regularly volunteers loading teachers' cars with supplies at Classroom Central. She has planted trees across our county with Trees for Charlotte, and served Christmas Breakfast with her family at the Charlotte Rescue Mission.

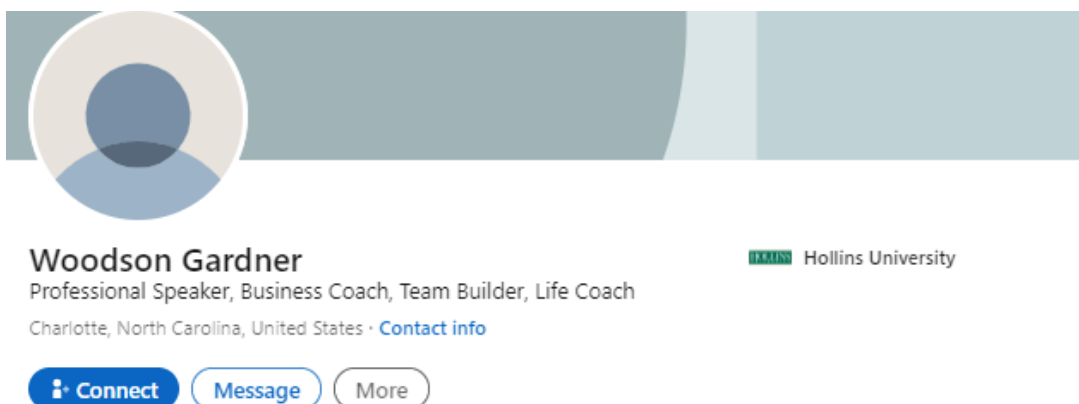
([Woodson Bradley](#), Accessed 4/10/24)

BRADLEY SERVED IN A PROMINENT ROLE IN A PYRAMID SCHEME FOR AN ORGANIZATION KNOWN AS FHTM

Bradley Was Extensively Involved With FHTM And Touted Her Roles As “One Of FHTM's Top 11 Earners, A Member Of The Organization's Ring Of Honor, And A Platinum Sales Manager”; Bradley Also Brought “Her Expertise To Bear On FHTM's Independent Representative Training Program As A National Trainer, In Which Role She Equips Individuals With The Resources And Guidance Necessary To Make Their Businesses More Profitable”

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sales, marketing, and business management to her current role as owner of a network marketing business. Gardner began her career in interior design and transitioned to the real estate industry in 2002. Working as a broker and realtor with Woodson Gardner & Associates Allen Tate Realtors from 2002 to 2006 and with RE/MAX Executive Realty from 2006 to 2010, she achieved numerous awards and recognitions. A Top Listing Agent nearly every year she spent in the profession, Woodson Gardner was also named Most Dependable Realtor on the East Coast by the independent firm Goldline Research, out of over 350,000 East Coast realtors, in 2008. Today, Woodson Gardner brings her business acumen to the management of her home-based business. Since 2008, she has worked with Fortune Hi-Tech Marketing, Inc. (FHTM), a direct sales firm in the network marketing industry. She has committed herself to expanding her extensive client base and thus growing her residual income, becoming one of FHTM's Top 11 Earners, a member of the organization's Ring of Honor, and a Platinum Sales Manager. She also brings her expertise to bear on FHTM's independent representative training program as a National Trainer, in which role she equips individuals with the resources and guidance necessary to make their businesses more profitable. Woodson Gardner graduated from Hollins University in 1995 with a Bachelor's in Economics and Theology. In a philanthropic capacity, she counsels domestic violence victims and pursues a variety of church-related activities. She resides in Charlotte, North Carolina.” ([LinkedIn](#), Accessed 4/10/24)



About

Woodson Gardner brings more than 10 years' experience in sales, marketing, and business management to her current role as owner of a network marketing business. Gardner began her career in interior design and transitioned to the real estate industry in 2002. Working as a broker and realtor with Woodson Gardner & Associates Allen Tate Realtors from 2002 to 2006 and with RE/MAX Executive Realty from 2006 to 2010, she achieved numerous awards and recognitions. A Top Listing Agent nearly every year she spent in the profession, Woodson Gardner was also named Most Dependable Realtor on the East Coast by the independent firm Goldline Research, out of over 350,000 East Coast realtors, in 2008.

Today, Woodson Gardner brings her business acumen to the management of her home-based business. Since 2008, she has worked with Fortune Hi-Tech Marketing, Inc. (FHTM), a direct sales firm in the network marketing industry. She has committed herself to expanding her extensive client base and thus growing her residual income, becoming one of FHTM's Top 11 Earners, a member of the organization's Ring of Honor, and a Platinum Sales Manager. She also brings her expertise to bear on FHTM's independent representative training program as a National Trainer, in which role she equips individuals with the resources and guidance necessary to make their businesses more profitable.

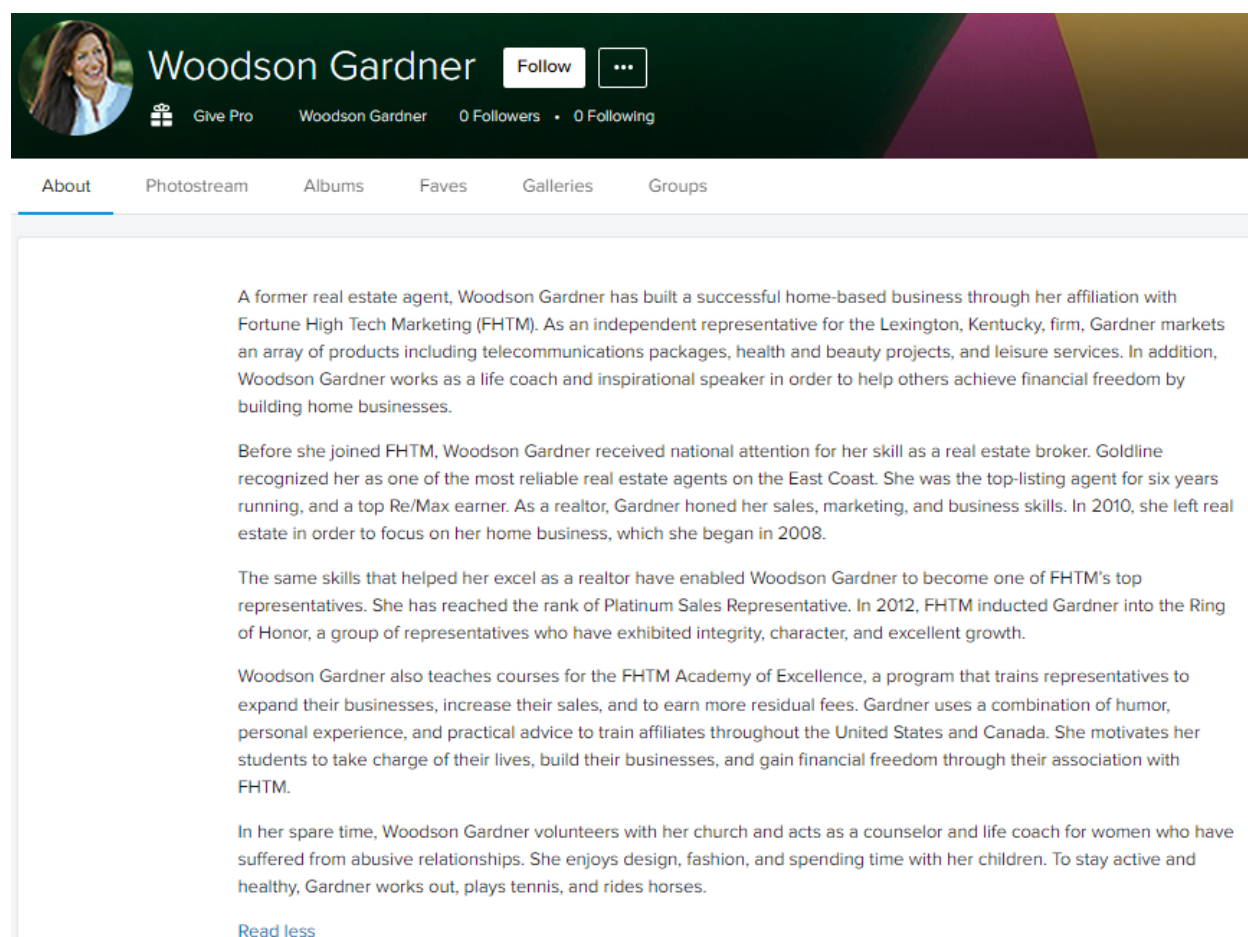
Woodson Gardner graduated from Hollins University in 1995 with a Bachelor's in Economics and Theology. In a philanthropic capacity, she counsels domestic violence victims and pursues a variety of church-related activities. She resides in Charlotte, North Carolina.

([LinkedIn](#), Accessed 4/10/24)

“Gardner Uses A Combination Of Humor, Personal Experience, And Practical Advice To Train Affiliates Throughout The United States And Canada. She Motivates Her Students To Take Charge Of Their Lives, Build Their Businesses, And Gain Financial Freedom Through Their Association With FHTM”

“Gardner Uses A Combination Of Humor, Personal Experience, And Practical Advice To Train Affiliates Throughout The United States And Canada. She Motivates Her Students To Take Charge Of Their Lives, Build Their Businesses, And Gain Financial Freedom Through Their Association With FHTM.” “A former real estate agent, Woodson Gardner has built a successful home-based business through her affiliation with Fortune High Tech Marketing (FHTM). As an independent representative for the Lexington, Kentucky, firm, Gardner markets an array of products including telecommunications packages, health and beauty projects, and leisure services. In addition, Woodson Gardner works as a life coach and inspirational speaker in order to help others achieve financial freedom by building home businesses. Before she joined FHTM, Woodson Gardner received national attention for her skill as a real estate broker. Goldline recognized her as one of the most reliable real estate agents on the East Coast. She was the top-listing agent for six years running, and a top Re/Max earner. As a realtor, Gardner honed

her sales, marketing, and business skills. In 2010, she left real estate in order to focus on her home business, which she began in 2008. The same skills that helped her excel as a realtor have enabled Woodson Gardner to become one of FHTM's top representatives. She has reached the rank of Platinum Sales Representative. In 2012, FHTM inducted Gardner into the Ring of Honor, a group of representatives who have exhibited integrity, character, and excellent growth. Woodson Gardner also teaches courses for the FHTM Academy of Excellence, a program that trains representatives to expand their businesses, increase their sales, and to earn more residual fees. Gardner uses a combination of humor, personal experience, and practical advice to train affiliates throughout the United States and Canada. She motivates her students to take charge of their lives, build their businesses, and gain financial freedom through their association with FHTM. In her spare time, Woodson Gardner volunteers with her church and acts as a counselor and life coach for women who have suffered from abusive relationships. She enjoys design, fashion, and spending time with her children. To stay active and healthy, Gardner works out, plays tennis, and rides horses.” ([Flickr](#), Accessed 4/10/24)



([Flickr](#), Accessed 4/10/24)

“A Former Real Estate Agent, Woodson Gardner Has Built A Successful Home-Based Business Through Her Affiliation With Fortune High Tech Marketing (FHTM)”

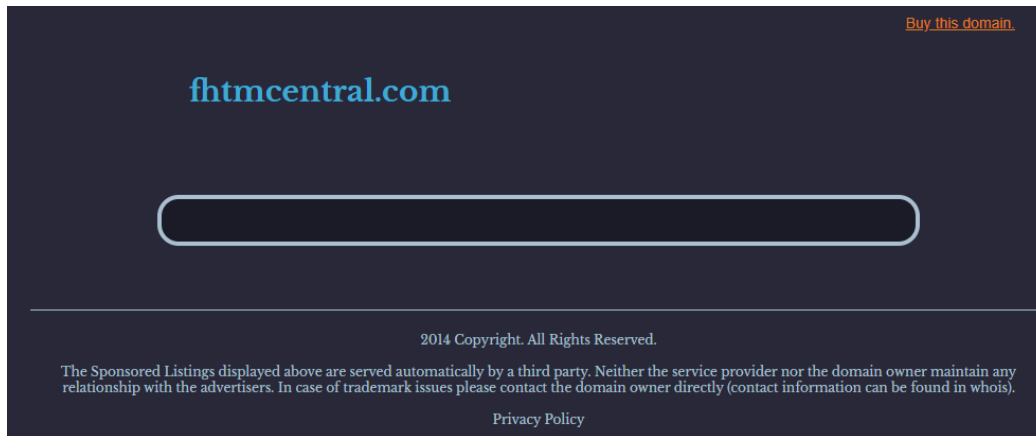
“A Former Real Estate Agent, Woodson Gardner Has Built A Successful Home-Based Business Through Her Affiliation With Fortune High Tech Marketing (FHTM).” ([Twitter](#), Accessed 4/10/23)



([Twitter](#), Accessed 4/10/23)

NOTE 1: Bradley’s Former Personal Site WOODSONGARDNER.COM Links Back To FHTMCENTRAL.COM

NOTE 1: *Bradley’s former personal site WOODSONGARDNER.COM links back to FHTMCENTRAL.COM:* <https://web.archive.org/>



(WoodsonBradley.com, Archived 12/28/14)

NOTE 2: Bradley Hosted Another Website Called Fortune Warriors Where She Posted Tips On How To Prospect For Potential FHTM Representatives

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([Fortune Warriors](http://FortuneWarriors.com), Accessed 4/10/24)

VIDEO: In 2012, Bradley Produced A Promotional Video For FHTM Canada And Introduced Herself Noting “Hey Everybody! I’m Woodson Gardner. National Sales Manager But Also National Trainer”

VIDEO: In 2012, Bradley Produced A Promotional Video For FHTM Canada And Introduced Herself Noting “Hey Everybody! I’m Woodson Gardner. National Sales Manager But Also National Trainer.” ([YouTube](https://www.youtube.com/watch?v=2/2/12), 2/2/12)



Woodson Gardner on FHTM Academy of Excellence



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([YouTube](#), 2/2/12)

VIDEO: In 2017, Bradley Posted A Video Noting Her Presentation At The 2012 Vision Canada Event; Bradley Is Noted As The “National Sales Manager” Of FHTM; Bradley Used Her Speech To Note The Alleged Personal Financial Benefits Of FHTM

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VIDEO: Bradley Posted A Personal Video Touting FHTM And Denying Accusations That The Company Was A Scam Directly Declaring “We’re Not A Scam. We’re Not A Scheme Or Anything Of The Sort”

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VIDEO: In 2012, FHTM Released A Video Commemorating Bradley's Induction Into The Company's Ring Of Honor; Bradley Touted Her Experiences With The Company

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([YouTube](#), 9/6/12)



FHTM Lifestyle: Ring of Honor Woodson Gardner

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([YouTube](#), 9/6/12)

In 2010, Montana Regulators Filed Legal Action Against FHTM Accusing The Company Of Being A “Pyramid Scheme” After Having Previously Fined The Company \$1 Million Over Its Business Practices

In 2010, Montana Regulators Filed Legal Action Against FHTM Accusing The Company Of Being A “Pyramid Scheme” After Having Previously Fined The Company \$1 Million Over Its Business Practices. “Marie Richardson of Daytona Beach, Fla., has never been as excited about a business opportunity as she is about her new work for Fortune Hi-Tech Marketing. In her first week and a half as an independent sales representative this summer, she earned \$800 in bonuses for recruiting four customers who agreed to pay a fee to become salespeople and buy or sell products. Kimberly Asper of Missoula, Mont., however, says she sometimes has to feed her family cereal or ramen noodles for dinner since she was laid off from a job and spent thousands trying to build a business through Fortune. She soon realized it was all about “signing people up.” Richardson was one of several thousand salespeople who gathered here last month for a Fortune conference to learn how to recruit people and sell products including cellphone service and private-label vitamins for the company, which Fortune's top money earner, Ruel Morton, calls “the most lucrative financial opportunity in the history of the country.” Asper, meanwhile, was one of the Montanans whose complaints led to a lawsuit filed

by the state securities commissioner and settlement that required Fortune to tell current and new representatives that no compensation will be paid for recruitment. Fortune paid \$1 million to settle the charges, including \$840,000 to reimburse Montanans, but did not admit wrongdoing. Multilevel or "network" marketing pays commissions to salespeople for the products they sell, on products sold by others they recruit, and often bonuses when their teams reach a certain level of sales. The Direct Selling Association, which represents companies that have multilevel compensation plans, estimates there were about 16.1 million of these "direct" salespeople in the U.S. last year, up from 15.1 million in 2008, thanks to high unemployment and the need for many to supplement incomes. Avon, Amway and Mary Kay Cosmetics are among the largest companies in multilevel marketing, but there are hundreds of lesser-known businesses that sell everything from jewelry to cellphone service. Critics of Fortune, including the Montana Commissioner of Securities and the plaintiffs in a new lawsuit seeking class-action status, say Fortune is a "pyramid scheme" because salespeople are primarily paid for recruiting, not product sales, and more recent recruits can't earn anything close to what the early entrants do. Fortune has until Nov. 2 to respond to the lawsuit seeking class-action status. "Presidential ambassadors" such as Morton average \$1,240,992 in income a year, yet make up just 0.07% of the company's representatives, according to a financial disclosure Fortune filed as part of its April settlement with Montana. The statement also shows 30% of Fortune representatives make nothing, and 54% of those with earnings average just \$93 a month, before costs. More than 99% of those who make money earn less than \$31,524 a year." ([USA Today](#), 10/15/10)

In 2013, "The FTC And The States Charged The Fortune Hi-Tech Marketing (FHTM) Defendants With Deceiving Consumers By Claiming They Would Earn Significant Income Through Selling Various Products And Services If They Signed Up As FHTM Representatives"

"In January 2013, The FTC And The States Charged The Fortune Hi-Tech Marketing (FHTM) Defendants With Deceiving Consumers By Claiming They Would Earn Significant Income Through Selling Various Products And Services If They Signed Up As FHTM Representatives." "The operators of a Kentucky-based pyramid scheme, which enrolled more than 350,000 consumers throughout the United States, Puerto Rico and Canada in the last four years, have been banned from multi-level marketing under a settlement with the Federal Trade Commission and the states of Illinois, Kentucky and North Carolina. The settlement also requires the operators to surrender assets totaling at least \$7.75 million, which will be returned to consumers. In January 2013, the FTC and the states charged the Fortune Hi-Tech Marketing (FHTM) defendants with deceiving consumers by claiming they would earn significant income through selling various products and services if they signed up as FHTM representatives." ([FTC](#), 5/13/14)

“At The Request Of The Federal Trade Commission And The States Of Illinois, Kentucky, And North Carolina, A Federal Court Has Halted An Allegedly Illegal Pyramid Scheme Pending Trial. The FTC And The State Attorneys General Seek To Stop The Allegedly Illegal Practices Of The Fortune Hi-Tech Marketing (FHTM) Operation, Which Claimed Consumers Would Make Substantial Income By Joining The Scheme”

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“According To The Complaint Filed By The FTC And The State Attorneys General, The Defendants Falsely Claimed Consumers Would Earn Significant Income For Selling The Products And Services Of Companies Such As Dish Network, Frontpoint Home Security, And Various Cell Phone Providers, And For Selling FHTM’s Line Of Health And Beauty Products”

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“As Alleged In The Complaint, FHTM Promoted Itself As A Way For Average People To Achieve Financial Independence”

“As Alleged In The Complaint, FHTM Promoted Itself As A Way For Average People To Achieve Financial Independence.” “As alleged in the complaint, FHTM promoted itself as a way for average people to achieve financial independence. Some FHTM representatives claimed

they earned more than 10 times as much as their previous earnings in their second and subsequent years with FHTM. One person claimed that another representative earned more than \$50,000 in his sixth month and millions of dollars in subsequent years. Another person promoted a recruitment meeting on her Twitter account, stating, “Bring ur friends & learn how 2 make \$120K aYR.” At its 2012 national convention in Dallas, FHTM called its top 30 earners to the stage to present them with a mock-up of a \$64 million check, which several of them shared as a photo on social networking websites. To participate in the scheme, consumers paid annual fees ranging from \$100 to \$300. To qualify for sales commissions and recruiting bonuses, they had to pay an extra \$130 to \$400 per month and agree to a continuity plan that billed them monthly for products unless they canceled the plan. Those who signed up more consumers and maintained certain sales levels could earn promotions and greater compensation, but contrary to FHTM’s claims, the complaint alleged, its compensation plan ensured that, at any given time, most participants would spend more money than they would earn.” ([FTC](#), 1/28/13)

NOTE 1: The FTC’s 2013 Legal Filing Against FHTM Directly Cited Gardner’s Advertising Practices Regarding Recruitment Bonuses As An Example Of Deceptive Practices By The Company

NOTE 1: The FTC’s 2013 Legal Filing Against FHTM Directly Cited Gardner’s Advertising Practices Regarding Recruitment Bonuses As An Example Of Deceptive Practices By The Company. (13cv578, [U.S. District Court For The Northern District Of Illinois Eastern Division](#), 1/24/13)

Recruitment bonuses. Product commissions are dwarfed by the recruitment bonuses offered by FHTM, which increase as the representative rises through the ranks of the FHTM compensation plan. Under the current compensation plan, for example, Regional Sales Managers will be paid at least \$100 for each new person in their downlines, while National Sales Managers will be paid at least \$190.⁴⁷ These bonuses accrue for unlimited levels in the representative's downline, and will be paid all the way through the new representative's upline. FHTM also doubles these bonus payments when the representative is particularly successful at recruiting in a certain month.⁴⁸

II. Defendants' Earnings Claims Are False and Violate the Law

FHTM dangles the promise of riches in order to lure consumers into joining its scheme. FHTM makes these promises in a variety of ways – through in-person presentations, pre-

⁴⁵ After Darla DiGrandi recently left FHTM for another MLM, she justified her decision: "There is no fee to join, it's a volume only company. Instead of buying multiple taxbots, amusement pack and raodside [sic], we buy something we can actually use. LOL." PX 1, Menjivar ¶ 89, Att. AAAAA at p. 2.

⁴⁶ PX 1, Menjivar ¶ 7(O), Att. O (over \$38 million paid in commissions in 2010-11, but more than \$32 million of that was for recruitment bonuses); PX 2, Vander Nat ¶ 8 (88% of FHTM payments classified as some type of recruitment bonus).

⁴⁷ PX 1, Menjivar ¶ 10(P)(iii), Att. YY at p. 12.

⁴⁸ PX 1, Menjivar ¶ 10(P)(iii), Att. YY at p. 12 (September 2012 Compensation Plan); *id.* ¶ 34, Att. EEE at pp. 14 (National Sales Manager **Woodson Gardner** describes the doubling of the bonus: "Remember those \$100 bills, well now they just went to 200, 200, 200, 200, 200, 200, 200."); *id.* ¶ 65(B), Att. EEEE at p. 10 (Brock Keen explains, "If your business is growing enough to where you're hitting those double bonuses, those 100s turn to 200s, the 60s turn to 120s, and the 30s turn to 60s and your residual doubles also for that month.").

(13cv578, [U.S. District Court For The Northern District Of Illinois Eastern Division](#), 1/24/13)

NOTE 2: The FTC's 2013 Legal Filing Against FHTM Directly Cited Gardner's Advertising Practices Regarding Compensation Amounts As An Example Of Deceptive Practices By The Company

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Paul Orberson, FHTM's leader, recognizes that FHTM's main marketing tool is the promise that consumers will earn significant money by joining FHTM. At FHTM's most recent national convention, FHTM paraded its top thirty earners on stage with mock-up of a \$64 million check. Orberson explained that "it seems to be in our industry that's what people kind of gravitate toward is those big checks, seeing how much these people have earned and here's what so-and-so has earned, here's what so-and-so has earned in his time or her time in the company, and that's great."⁵⁸ Orberson has set the tone for the entire company in making such outlandish earnings claims.

Following Orberson's example, FHTM representatives regularly recruit by telling consumers exactly how much money they and others have earned in FHTM – the clear message being that anybody signing up with FHTM will be able to replicate these earnings. For example, one of FHTM's most influential Presidential Ambassadors recently bragged on Twitter that he had made more than \$5 million through FHTM,⁵⁹ another Presidential Ambassador claimed to have "earned millions of dollars in this company,"⁶⁰ and a third Presidential Ambassador told audiences that FHTM provides him with a "five-figure monthly income."⁶¹ A Platinum Sales

⁵⁸ PX 1, Menjivar ¶ 78, Att. QQQQ at p. 22. National Sales Manager Woodson Gardner sent out a photo of the check via Twitter. *Id.* ¶ 88(A) & Att. ZZZZ at p. 34. On stage at the prior year's national convention, Orberson told the story of a Presidential Ambassador who "was washing dishes at a Marriott hotel five, six years ago, and he's a millionaire in this business five, six, seven years later." *Id.* ¶ 36, Att. HHH at p. 7.

(13cv578, [U.S. District Court For The Northern District Of Illinois Eastern Division](#), 1/24/13)

NOTE 3: The FTC's 2013 Legal Filing Against FHTM Directly Cited Gardner's Claims Regarding Purchasing Bundles For Representatives As An Example Of Deceptive Practices By The Company

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bare minimum of products or services, and they are provided with the simplest way to do that – by purchasing bundles.¹²² A Presidential Ambassador summed it up well at the 2011 FHTM national convention: “If you want to get rich in real estate, sell a house . . . If you want to get rich in Fortune, sign a rep.”¹²³

C. FHTM Pays Lip Service to Anti-Pyramid Scheme Rules

On paper, FHTM has adopted some policies that pretend to achieve the goal of the *Amway* defenses. However, these policies are not enforced and FHTM encourages its representatives to evade them. For example, FHTM says that (1) representatives may return some unused products to FHTM; (2) representatives must make a majority of their sales to someone other than themselves; and (3) 70% of the products or services a representative buys each month must be sold to third parties outside FHTM or used by the representative during the course of the month.¹²⁴

FHTM does nothing to enforce these rules. Unlike *Amway*, FHTM charges a 10% restocking fee on the products it will even allow a representative to return, requires the representative to return any compensation they earned as a result of buying the products, and the

virtually no incentive to buy or sell more than 15 products a month to maximize FHTM's pay structure (*Id.*).

¹²² PX 1, Menjivar ¶ 54(B), Att. UU at p. 49 (National Sales Manager Woodson Gardner says that “the most customer points you’ll ever need is 15”); *id.* ¶ 70(A), Att. IIII at p. 14 (Scott Aguilar says that he has “16 customers on a report, 14 of them are just us”); *id.* ¶ 66(D) & Att. FFFF at p. 9 (“I know most of you listening to this already have your ten-point starter pack because most everybody starts exactly the way they need to maximize the pay plan. There’s no other good way to start if you’re not going to maximize everything.”); *id.* ¶ 64, Att. DDDD at p. 39 (suggesting people buy a bundle even if they don’t like what is in it just so that they can qualify their business).

(13cv578, [U.S. District Court For The Northern District Of Illinois Eastern Division](#), 1/24/13)

“In Addition To Charging The Defendants With Operating An Illegal Pyramid Scheme And Making False Earnings Claims, The FTC Charged Them With Furnishing Consumers With False And Misleading Materials For Recruiting More Participants”

“In Addition To Charging The Defendants With Operating An Illegal Pyramid Scheme And Making False Earnings Claims, The FTC Charged Them With Furnishing Consumers With False And Misleading Materials For Recruiting More Participants.” “According to the complaint, recruits were told they could earn high commissions by selling products to people outside the operation, but instead only minimal compensation was paid for sales to non-participants, and few products were ever sold to anyone other than participants. The scheme provided much larger rewards for recruiting people than for selling products, and more than 85 percent of the money consumers made was for recruitment. In addition to charging the

defendants with operating an illegal pyramid scheme and making false earnings claims, the FTC charged them with furnishing consumers with false and misleading materials for recruiting more participants. The attorneys general offices of Illinois, Kentucky and North Carolina joined the FTC complaint, as well as alleging violations of their respective state laws. The defendants are Paul C. Orberson, Thomas A. Mills, Fortune Hi-Tech Marketing Inc., FHTM Inc., Alan Clark Holdings LLC, FHTM Canada Inc., and Fortune Network Marketing (UK) Limited. On January 24, 2013, the court halted the deceptive practices, froze the defendants' assets, and appointed a temporary receiver over the corporations pending a trial. The Commission vote, including Commissioner J. Thomas Rosch, authorizing the staff to file the complaint was 5-0. The complaint was filed in the U.S. District Court for the Northern District of Illinois, Eastern Division." ([FTC](#), 1/28/13)

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In 2013, Kentucky Attorney General Jack Conway Described FHTM As “One Of The Most Prolific Pyramid Schemes Operating In North America.” ““This is the beginning of the end for one of the most prolific pyramid schemes operating in North America,” Kentucky Attorney General Jack Conway said. “This is a classic pyramid scheme in every sense of the word. The vast majority of people, more than 90 percent, who bought in to FHTM lost their money.” ([FTC](#), 1/28/13)

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“Fortune Hi-Tech Marketing, an alleged pyramid scheme in Kentucky that recruited more than 100,000 participants including consumers in North Carolina, has been shut down and its assets frozen, Attorney General Roy Cooper announced Monday. "Operations like this claim to offer career success and high earnings. But the reality is that only the few at the top make money, and they make it at the expense of new recruits who end up losing," said Cooper. Cooper partnered with the Federal Trade Commission and attorneys general in Kentucky and Illinois to ask a federal judge to shut down Fortune Hi-Tech Marketing (FHTM) last week. A court-appointed receiver now has possession of FHTM's assets and secured the company's headquarters and warehouse in Kentucky this morning. Cooper, the FTC, and the other attorneys general filed a lawsuit on Thursday, January 24 in federal court against FHTM and its principal operators, Paul Orberson, president, and Thomas Mills, vice president. U.S. District Court Judge John W. Darrah issued a temporary restraining order against the company, which required FHTM to immediately cease operations. The lawsuit seeks a permanent ban on FHTM's illegal operations, civil penalties, and refunds for consumers. As alleged in the complaint filed with the court, FHTM claimed participants could earn tens of thousands of dollars a year by buying into the operation to sell satellite television service, home security systems, beauty products and other consumer goods and services. Consumers paid \$249 to join FHTM. To qualify for sales commissions and

recruiting bonuses, they had to pay an extra \$130 to \$400 and agree to be billed monthly for products unless they canceled the plan. Despite FHTM's claims, nearly every consumer who signed up lost more money than they ever made. Those who did make money did so by recruiting others to join the scheme, not by selling anything, Cooper, the FTC and the other attorneys general contend. FHTM's promotional presentations and materials focused almost entirely on recruiting new members rather than selling products, and FHTM distributors had no incentive to sell products. For example, FHTM distributors only received pennies for selling multi-year service contracts, but received substantial payments for each new FHTM member they recruited. "This is a classic pyramid scheme in every sense of the word," Kentucky Attorney General Jack Conway said. "The vast majority, more than 90 percent, who bought in to FHTM lost their money." FHTM affected more than 100,000 consumers throughout the United States and in other countries." ([WBTV](#), 1/28/13)

"Cooper's Consumer Protection Division Received 37 Written Complaints And Inquiries About FHTM Starting In 2008, And Opened Its Investigation Into The Company In 2010"

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In 2014, The FTC Banned FHTM For Being A Pyramid Scheme That “Enrolled More Than 350,000 Consumers Throughout The United States, Puerto Rico And Canada”; The Order Also “Requires The Operators To Surrender Assets Totaling At Least \$7.75 Million, Which Will Be Returned To Consumers”

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“In Recent Years, The Scheme Targeted Spanish-Speaking And Immigrant Communities. Participants Were Required To Pay Substantial Start-Up Costs And Monthly Fees To Retain Their Positions With The Company”

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“After Conducting Its Own Investigation, The Court-Appointed Receiver Determined That FHTM’s Main Business Was Recruiting New Members And Not Selling Products And Services As It Claimed, And Confirmed The Allegations Made By The FTC And The States”

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“The Overwhelming Majority Of Participants – More Than 98 Percent – Lost More Money Than They Ever Made. At Least 88 Percent Of Consumers Did Not Even Recoup Their Enrollment Fees. To The Extent That Consumers Could Make Any Income, It Was Mainly For Recruiting Other Consumers Into FHTM’s Scheme”

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of consumers did not even recoup their enrollment fees. To the extent that consumers could make any income, it was mainly for recruiting other consumers into FHTM's scheme. More than 81 percent of the payments to participants were based on recruiting new members and not for the sale of products or services. Not surprisingly, at least 94 percent of consumers did not renew their membership after their initial year." ([FTC](#), 5/13/14)

- **“In Addition To The Multi-Level Marketing Ban, The Settlement Order Permanently Prohibits Thomas A. Mills, Fortune Hi-Tech Marketing Inc., FHTM Inc., Alan Clark Holdings LLC, FHTM Canada Inc., And Fortune Network Marketing (UK) Limited From Misrepresenting Material Facts About Any Product Or Service, Including Claims Concerning How Much Money Consumers Can Earn.”** “In addition to the multi-level marketing ban, the settlement order permanently prohibits Thomas A. Mills, Fortune Hi-Tech Marketing Inc., FHTM Inc., Alan Clark Holdings LLC, FHTM Canada Inc., and Fortune Network Marketing (UK) Limited from misrepresenting material facts about any product or service, including claims concerning how much money consumers can earn. The order also bars the defendants from selling or otherwise benefitting from customers' personal information, failing to properly dispose of customer information, and collecting any additional money from customers.”
- **“The Order Imposes A Judgment Of More Than \$169 Million, Which Will Be Partially Suspended When The Defendants Have Surrendered Certain Assets With An Estimated Value Of At Least \$7.75 Million, Including Assets Of The Deceased Defendant Paul C. Orberson's Estate.”** “The order imposes a judgment of more than \$169 million, which will be partially suspended when the defendants have surrendered certain assets with an estimated value of at least \$7.75 million, including assets of the deceased defendant Paul C. Orberson's estate. The full judgment will become due immediately if the defendants are found to have misrepresented their financial condition. The settlement resolves all of the FTC's claims against the defendants, as well as the claims brought by Illinois, Kentucky and North Carolina. The Commission vote approving the proposed stipulated order was 4-0. The order was entered by the U.S. District Court for the Eastern District of Kentucky, Central Division at Lexington, on May 9, 2014.” ([FTC](#), 5/13/14)

In 2016, The FTC Mailed “285,361 Checks Totaling More Than \$3.7 Million To People Who Lost Money To Fortune Hi-Tech Marketing (FHTM), A Pyramid Scheme Whose Operators Were Banned From Multi-Level Marketing Under A Settlement With The FTC And The States Of Illinois, Kentucky And North Carolina”

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earning sales representatives have been resolved. The FTC never requires people to pay money or provide account information to cash refund checks. If you have questions about the case, contact the FTC's refund administrator, Epiq Systems, Inc., at 800-964-0978. Learn more about the FTC's refund program. The Federal Trade Commission works to promote competition, and protect and educate consumers. You can learn more about consumer topics and file a consumer complaint online or by calling 1-877-FTC-HELP (382-4357). Like the FTC on Facebook, follow us on Twitter, read our blogs and subscribe to press releases for the latest FTC news and resources." ([FTC](#), 11/8/16)

BRADLEY SERVED IN A PROMINENT ROLE IN A PYRAMID SCHEME FOR AN ORGANIZATION KNOWN AS ARIIX

VIDEO: In 2015, Bradley Posted A Video Promoting MLM Company Ariix

VIDEO: In 2015, Bradley Posted A Video Promoting MLM Company Ariix. ([YouTube](#), 2/10/15)



([YouTube](#), 2/10/15)

VIDEO: In 2015, Bradley Posted A Video Promoting Ariix's Slenderiiz Product

VIDEO: In 2015, Bradley Posted A Video Promoting Ariix's Slenderiiz Product. ([YouTube](#), 2/10/15)



My Great 28 Woodson Gardner 10 minute skinny video

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4

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([YouTube](#), 2/10/15)

In 2014, UK Regulators Under The Advertising Standards Authority Criticized Slenderiix For Making Unfounded Claims Regarding Its Efficacy And Prohibited The Company From Making Such Claims Moving Forward

In 2014, UK Regulators Under The Advertising Standards Authority Criticized Slenderiix For Making Unfounded Claims Regarding Its Efficacy And Prohibited The Company From Making Such Claims Moving Forward. “The study provided by the advertisers looked at the effect of “Slenderiix Xceler8”, “Rejuveniix (energy)”, “Nutrifii (vitamins)” and “Resoriix (detox)” on individuals in conjunction with a diet which limited calorie intake to around 1250 calories per day. Twenty-three individuals, three men and 20 women, who were looking to lose weight, “were selected on the basis of commitment to completing the 12 week course”. Nineteen completed the programme. The study compared one group taking Slenderiix, Xceler8 and Nutrifii; one group taking Slenderiix, Xceler8, Nutrifii and Resoriix; one group taking Slenderiix, Xceler8, Nutrifii, Rejuveniix and Resoriix; and a “control group” which took Nutrifii and Resoriix. All groups also reduced their calorie intake to to 1250 calories during the study. The groups were also given detailed advice about food selection, daily calorie maximum intake and appropriate hydration in relation to their diet. The study provided the minimum and maximum starting weights and averages, but did not detail how the individuals within the groups were selected to ensure that the groups were comparable and sufficiently representative of any relevant variables to draw robust conclusions, nor did the study specify how many individuals were in each group. The ASA was concerned that each group might have unequal numbers of participants and/or an insufficient number of participants to draw robust conclusions. Individuals were also required to participate in an exercise programme. However, the study suggested that the participants could select their own exercise programme, if they wished, and were concerned that different exercise programmes, in the context of a weight loss study, could also affect the robustness of the conclusions drawn in relation to the effects of Slenderiix and Xceler8. In light

of the possible limitations of the methodology used, we considered that the study was unlikely to be sufficiently robust to support any weight loss claims. Moreover, we noted that the CAP Code required homeopathic medicinal products to be registered in the UK and to confine information given in marketing communications to that which appeared on the product label. We considered that the ad was promoting the homeopathic products Slenderiix & Xceler8, but understood, following consultation with the Medicines and Healthcare Products Regulatory Agency (MHRA), that Slenderiix and Xceler8 were not licensed as medicines in the UK. We considered that claims such as “Slenderiix ... alleviates hunger as it flushes fats and toxins from our systems”, “Slenderiix signals your hypothalamus to mobilize fat out of your body’s fat storage areas makes it available for you to burn as you go about your daily activities”, “Slenderiix and Xceler8 Drops begin to curb your hunger and release fat stores to help feed your body” and “Xceler8 helps ensure maximum effectiveness when used with Slenderiix Drops ... it optimizes absorption of everything you eat and drink, including the Slenderiix drops” were medicinal claims that the products achieved weight loss. Because those medicinal claims were being made in relation to unlicensed homeopathic products, we concluded that the claims breached the advertising Code. On that point, the claims breached CAP Code (Edition 12) rules 12.1 and 12.20 (Medicines, medical devices, health-related products and beauty products). Action The claims must not appear again in their current form. We told the advertisers not to make medicinal claims for Slenderiix and Xceler8.” ([UK Advertising Standards Authority](#), 6/11/14)

“Forever Living Is One Of A Number Of Multi-Level Marketing (MLM) Companies Facing Criticism From Some Women Who Feel They Have Been Exploited. Others Include Arbonne, Ariix, Even The Body Shop”

“Forever Living Is One Of A Number Of Multi-Level Marketing (MLM) Companies Facing Criticism From Some Women Who Feel They Have Been Exploited. Others Include Arbonne, Ariix, Even The Body Shop.” “Forever Living is one of a number of Multi-Level Marketing (MLM) companies facing criticism from some women who feel they have been exploited. Others include Arbonne, Ariix, even The Body Shop. The once High-Street favourite now also sells its beauty products via sales reps on social media — you may well have seen them on Facebook. They may even have become more frequent in recent weeks — since some MLM companies are reportedly using the pandemic to recruit sellers by offering flexible hours and work from home. Their targets are predominantly women, often with young families. The Direct Selling Association (DSA) estimates roughly 400,000 people in the UK are currently involved in direct selling in some way — around 76 per cent women.” ([Daily Mail](#), 7/15/20)

Ariix Has Been Described By At Least One Former Representative As “A Cult” In Which She Was Lured By Promises Of High Profits

Ariix Has Been Described By At Least One Former Representative As “A Cult” In Which She Was Lured By Promises Of High Profits. “Teacher Olivia Thompson, 38, was also left out of pocket when she spent £1,400 on wellness products from high-end US MLM Ariix, after being told buying in bulk would mean better profits. In six months, she clawed back only £700. ‘I have a First Class degree — I’m not stupid,’ says Olivia, a single parent from London. ‘But I was sold a dream and ended up feeling like a joke.’ Ariix, with its £110 night cream and £66 supplements, stood out as ‘classy,’ says Olivia, who spent £200 on a starter package in 2018. She too was told by her upline to flood social media with Ariix-related messages. ‘I said I’d cured my

hangover with their vitamin drink, but I wasn't telling the truth,' she says. 'It was like a cult.' Ariix operates on a points system, under which reps have to earn 100 points a month — the equivalent of about £100 — to earn 15 per cent commission. 'If I didn't sell enough I got no commission,' says Olivia. Over three months, she spent £1,200 on more products, maxing out her credit card. She told herself it was worth it to gain an increase to 25 per cent. 'My upline said she couldn't tell me to spend the money — but that if she were me she would, and I would quickly make it back.' Instead, Olivia alienated friends and family. 'My sister said MLMs were "evil". I felt judged by school friends — we still don't speak.' She felt increasingly despondent: 'I was desperate and in tears.' She recruited just one woman before quitting in December 2018. 'I got into at least £700 of debt and would have been much better off getting another job,' says Olivia. Ariix says average annual earnings for all its 43,945 global sellers are £1,616 — but for full-time workers, it is £228,655. They claim there is no obligation to buy a starter pack. A spokesperson says they 'discourage "product loading" in an attempt to increase commission.' 'We are very conscientious in our training that product purchase is not a requirement,' the company said, adding that it is 'unable to control the actions of every single one of our reps'. It added, 'We regret this individual did not receive the support and follow-up from her team member,' but denied Ariix was comparable to a pyramid scheme, adding: 'Network Marketing or "MLM" is based on the sale of high-quality products to consumers.' Olivia, however, ended up throwing unsold Ariix products away." ([Daily Mail](#), 7/15/20)

In 2023, "Ariix [Was] Fined €960,000 EUR For Consumer Fraud By Italy's Competition Authority (AGCM)"

In 2023, "Ariix Has Been Fined €960,000 EUR For Consumer Fraud By Italy's Competition Authority (AGCM)." "Ariix has been fined €960,000 EUR for consumer fraud by Italy's Competition Authority (AGCM). Following a complaint filed by the consumer protection group "Il Gatto e la Volpe Nel Web" in 2018, Italian authorities began investigating Ariix and parent company NewAge. AGCM's legal action commenced against Ariix Italy S.r.l. on May 24th, 2022. As part of their investigation, AGCM established that Ariix made 30 to 40 million euros in sales in Italy in 2021. Ariix was promoted in Italy through Unstoppable Generation, which AGCM initially tied to Unstoppable Generation S.r.l. Unstoppable Generation is run by Claudio Capozza. In 2020 BusinessForHome cited as Ariix's "no. 1 next gen leader worldwide". ([Behind MLM](#), 1/4/23)

Italian Regulator "AGCM Concluded "Conditions For A Pyramid Sales System Existed", And That "Ariix's Sales System Has The Characteristics Of A Pyramid Scheme"

Italian Regulator "AGCM Concluded "Conditions For A Pyramid Sales System Existed", And That "Ariix's Sales System Has The Characteristics Of A Pyramid Scheme." "AGCM's investigation found that, outside of Ariix, Unstoppable Generation generated 118,000 euros for Capozza in 2021. In investigating Ariix, AGCM examined whether: Ariix's "sales system" was a pyramid scheme; promotion of Ariix's products on social media by Unstoppable Generation failed to disclose the business and relationship the poster had to the business; and the products Slendeeriz Gocce Day&Night" and "Tahitian Noni" were sold without approval by the Ministry of Health. The investigation saw AGCM visit Ariix's and Unstoppable Generation's registered offices in Italy. In June 2022 Ariix and Unstoppable Generation provided AGCM with additional requested information. AGCM's investigation concluded on November 7th. Based on

information provided, AGCM established that, for 2021, 50% to 55% of Ariix's sales volume was distributor purchases. Upon further analysis, AGCM concluded; Ariix's marketing materials focused "on expanding the number of (recruited) affiliates rather than sale of products"; "over half" of Ariix's sales volume was generated via distributor purchases (as opposed to sales to retail customers); what retail sales volume existed within Ariix, was not enough to sustain the business; Ariix's "economic sustainability" was "directly related to the number of (distributors)" it has; Based on these findings, AGCM concluded "conditions for a pyramid sales system existed", and that "Ariix's sales system has the characteristics of a pyramid scheme." ([Behind MLM](#), 1/4/23)

BRADLEY WAS RUMORED TO HAVE BEEN INVOLVED IN AN EXTRA MARITAL AFFAIR WITH A FELLOW COLLEAGUE AT FHTM

In 2011 And 2012, Bradley (Then Woodson Gardner) Was Alleged In Some Online Message Boards Of Being The Mistress Of Major FHTM Salesman Todd Rowland And Of Being "Married To A Convicted Child Molester And Registered Sexual Predator"

In 2011 And 2012, Bradley (Then Woodson Gardner) Was Alleged In Some Online Message Boards Of Being The Mistress Of Major FHTM Salesman Todd Rowland And Of Being "Married To A Convicted Child Molester And Registered Sexual Predator."
([Complaints Board](#), 10/30/12)



Robshaw of Cheyenne, US
Oct 30, 2012 | 4:12 am EDT



He has no morals or ethics. Religion has no part in his life. Money is the only thing he cares about. He will screw anyone who can help him get to the top or on top. His income has deteriorated in the past 2 years to nothing. He has major IRS issues including audits for the past 5 years. His mistress **Woodson** Gardner is married to a convicted child molester and registered sexual predator. He will lie - cheat or steal as long as it makes him money.

Helpful? 0 0

Share

Reply

([Complaints Board](#), 10/30/12)

 **Unknown** said...

FHTM is no longer authorized to use the DuPont name, logo, or trademark in any way. FHTM should immediately discontinue the use of any materials containing the DuPont logo. Our right to use DuPont's name, logo and trademark was revoked because FHTM abused the system by creating and distributing unapproved marketing materials that displayed the DuPont logo.

March 7, 2011 at 7:22 AM

Anonymous said...

Todd Rowland's mistress - **Wood**son Gardner is married to Platinum Sales Manager - Clay Hair - who is a convicted child molester and registered sexual predator.

Why did Todd move out of his rent-a-mansion in the middle of the night last month? He couldn't afford the 50K monthly payments. Is his life unraveling because his FHTM income has dropped like an asteroid from space?

([Work FHTM Blog](#), 3/7/11)

BRADLEY'S LIBERAL AGENDA AND RADICAL PARTISANSHIP

ON SOCIAL MEDIA, BRADLEY AS PROMOTED CONTENT INDICATING EMPATHY FOR ILLEGAL IMMIGRANTS WHO CROSSED THE SOUTHERN BORDER

In 2022, Bradley 'Liked' A Tweet Stating "Holy Fucking Shit, What Greg Abbott Did On Christmas Eve Should Be A Fucking Crime"

In December 2022, Bradley 'Liked' A Tweet Stating "Holy Fucking Shit, What Greg Abbott Did On Christmas Eve Should Be A Fucking Crime." ([Twitter](#), Posted 12/26/22)



([Twitter](#), Posted 12/26/22)

According To Reporting By The National Review, "Three Buses From Texas Dropped Off More Than 100 Migrants Near Vice President Kamala Harris's Home In Washington, D.C." "Three buses from Texas dropped off more than 100 migrants near Vice President Kamala Harris's home in Washington, D.C., on Christmas Eve, the latest in a series of transports this year from border states to Democrat-run cities to the north." ("Busloads Of Migrants From Texas Dropped Off Near Kamala Harris's Home On Christmas Eve," [National Review](#), 12/26/22)

National Review: "In A Christmas Day Statement, The White House Condemned Abbott For Sending The Buses North." "With thousands of men, women, and children illegally crossing into Texas every day, and with the expectation that those numbers will only increase if Title 42 expulsions end, the state is overburdened as we respond to this disaster caused by you and your administration," Abbott wrote. "Your policies will leave many people in the bitter, dangerous cold as a polar vortex moves into Texas." In a Christmas Day statement, the White House condemned Abbott for sending the buses north. "Governor Abbott abandoned children on the side of the road in below-freezing temperatures on Christmas Eve without coordinating with any federal or local authorities," White House spokesman Abdullah Hasan said, according to the Times. "This was a cruel, dangerous, and shameful stunt." Amy Fischer, an organizer with the Migrant Solidarity Mutual Aid Network, which received the migrants in Washington, D.C., also called Abbott's actions cruel, according to ABC-7 News. "People are getting off the buses, they don't have coats, they don't have clothes for this kind of weather, and they're freezing," she told the Washington, D.C., news station." ("Busloads Of Migrants From Texas Dropped Off Near Kamala Harris's Home On Christmas Eve," [National Review](#), 12/26/22)

BRADLEY APPEARS TO BE UNAPOLOGETICALLY PRO-ABORTION***Bradley Has Been Endorsed By The Pro-Choice Organization EMILY's List In 2024***

Bradley Has Been Endorsed By The Pro-Choice Organization EMILY's List In 2024. ‘The following information was released by EMILYs List: Today EMILYs List, the nation's largest resource for women in politics, endorsed eight Democratic pro-choice women for election and reelection to North Carolina's state legislature. EMILYs List Interim President Jessica Mackler released the following statement: "In North Carolina, extremist Republicans have already passed one abortion ban, and if they keep their legislative supermajority they will only further jeopardize our rights. We can't let them win. Making sure women like these eight pro-choice champions get into office and stay in office is at the heart of EMILYs List's mission, and we are honored to stand by each of them. Their dedication to our fundamental freedoms is unmatched." EMILYs List endorsed the following slate of candidates for election and reelection: Lisa Grafstein, NC-SD13 Val Applewhite, NC-SD19 Woodson Bradley, NC-SD42..." (EMILY's List, 2/22/24)

In 2023, Bradley ‘Liked’ A Tweet Noting Kate Cox’s Journey To Leave Texas For Abortion Care As “Not Acceptable”

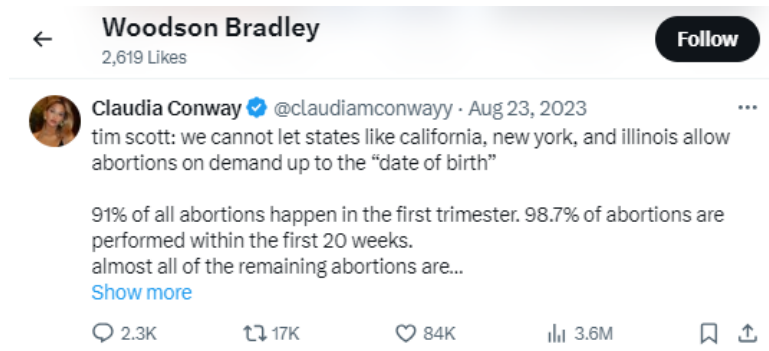
In December 2023, Bradley ‘Liked’ A Tweet Noting Kate Cox’s Journey To Leave Texas For Abortion Care As “Not Acceptable.” ([Twitter](#), Posted 12/11/23)



([Twitter](#), Posted 12/11/23)

In 2023, Bradley ‘Liked’ A Tweet Asserting That The Majority Of Abortions Occur Within The Early Time Frames Of Pregnancy And Those Near The Date Of Birth Are “Performed For The Mother’s Sake And Because The Fetus Is Not Viable”

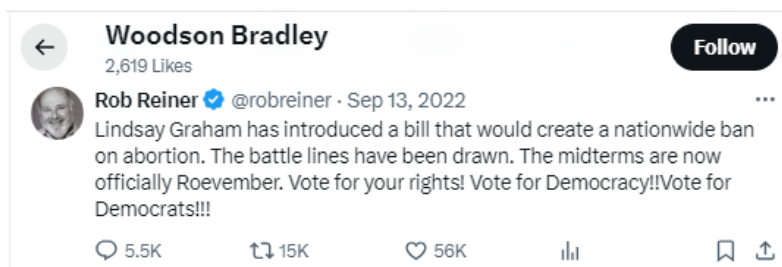
In August 2023, Bradley ‘Liked’ A Tweet Asserting That The Majority Of Abortions Occur Within The Early Time Frames Of Pregnancy And Those Near The Date Of Birth Are “Performed For The Mother’s Sake And Because The Fetus Is Not Viable.” ([Twitter](#), Posted 8/23/23)



([Twitter](#), Posted 8/23/23)

In 2022, Bradley ‘Liked’ A Tweet Opposing Lindsay Graham’s Introduction Of Nation Wide Abortion Bans, Stating “The Battle Lines Have Been Drawn. The Midterms Are Now Officially Roevenember. Vote For Your Rights! Vote For Democracy!!Vote For Democrats!!!”

In September 2022, Bradley ‘Liked’ A Tweet Opposing Lindsay Graham’s Introduction Of Nation Wide Abortion Bans, Stating “The Battle Lines Have Been Drawn. The Midterms Are Now Officially Roevenember. Vote For Your Rights! Vote For Democracy!!Vote For Democrats!!!” ([Twitter](#), Posted 9/13/22)



([Twitter](#), Posted 9/13/22)

BRADLEY HAS INDICATED SUPPORT FOR POLICIES THAT WOULD UNDERMINE THE SECOND AMENDMENT

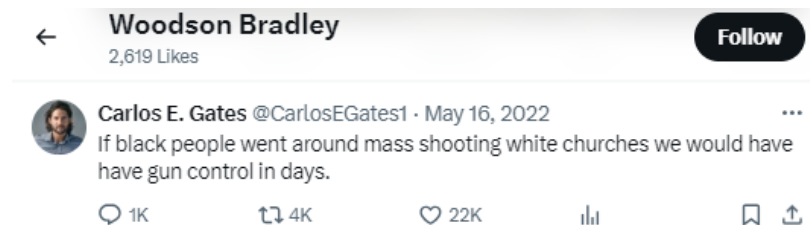
Bradley “... Supports Measures Like Congress's Bipartisan Act, As Well As Universal Background Checks And Restrictions On Ownership Of Certain Types Of Weapons Or By Age...”

“Woodson Bradley Got A Concealed Weapons Permit And Owns A Gun. She Supports Measures Like Congress's Bipartisan Act, As Well As Universal Background Checks And Restrictions On Ownership Of Certain Types Of Weapons Or By Age. Says Bradley, “The Second Amendment Mentions Arming A Well-Regulated Militia — Not A Disgruntled Boyfriend Or Husband Having A Bad Day.” ([Good Housekeeping](#), 10/2/22)

- **Of Note, Bradley Recounted Being Threatened With A Firearm During A Domestic Abuse Incident.** “When Woodson Bradley was in her 20s, her boyfriend gradually became more controlling and physically violent. One night during a fight, he dragged her by the hair to the garage and handed her a gun, she says. He held another gun to her head and told her to shoot her beloved border collie, Amos. In her rural neighborhood, no one could hear her screams and pleading. Bradley considered her options — if she turned the gun on her boyfriend, she had no idea if the gun was loaded. He got closer to her, so loud and close that she could feel his spit and hot breath on her face, his rage ringing in her ears. “I begged God to forgive me,” Bradley said. She pulled the trigger, shaking. Click. Empty. Her boyfriend slapped her face with a backhanded blow, punching and kicking her, calling her vile words for being willing to kill her dog, she says. “I ran away from him like an animal, grabbing everything I could,” Bradley says. Later, she discovered the situation is a common abuser's technique — creating horrific conditions where no matter what you choose, it's the wrong choice. She fled the state.” ([Good Housekeeping](#), 10/2/22)

In 2022, Bradley ‘Liked’ A Tweet Asserting There Would Be Swift Passage Of Gun Control “If Black People Went Around Mass Shooting White Churches”

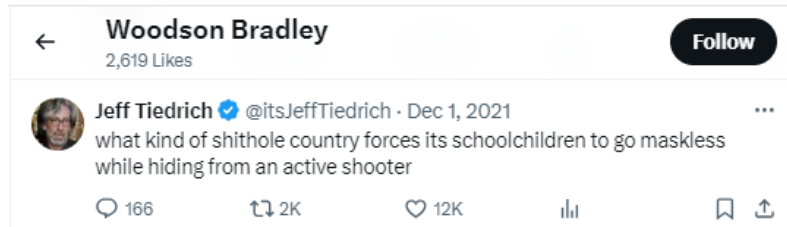
In May 2022, Bradley ‘Liked’ A Tweet Asserting The Quick Legislation Of Gun Control “If Black People Went Around Mass Shooting White Churches.” ([Twitter](#), Posted 5/16/22)



([Twitter](#), Posted 5/16/22)

In 2021, Bradley ‘Liked’ A Tweet Stating “What Kind Of Shithole Country Forces Its Schoolchildren To Go Maskless While Hiding From An Active Shooter”

In December 2021, Bradley ‘Liked’ A Tweet Stating “What Kind Of Shithole Country Forces Its Schoolchildren To Go Maskless While Hiding From An Active Shooter.” ([Twitter](#), Posted 12/1/21)



([Twitter](#), Posted 12/1/21)

ON SOCIAL MEDIA, BRADLEY HAS INDICATED SUPPORT FOR THE LGBTQ POLITICAL AGENDA

In 2023, Bradley Posted A Photo Of Herself Dressed To Celebrate The ‘CLT’ Pride Parade With Hashtags “#CLTPride #Prideparade #Love #Loveislove”

In August 2023, Bradley Posted A Photo Of Herself Dressed To Celebrate The ‘CLT’ Pride Parade With Hashtags “#CLTPride #Prideparade #Love #Loveislove.” ([Instagram](#), Posted 8/20/23)

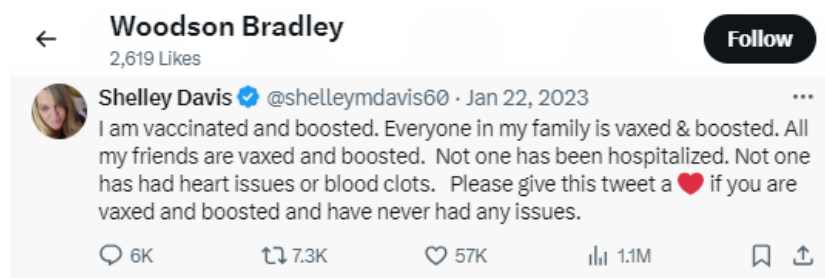


([Instagram](#), Posted 8/20/23)

ON SOCIAL MEDIA, BRADLEY HAS PROMOTED THE COVID VACCINE

In 2023, Bradley ‘Liked’ A Tweet Praising Covid Vaccinations And Booster Shots

In January 2023, Bradley ‘Liked’ A Tweet Praising Covid Vaccinations And Booster Shots. ([Twitter](#), Posted 1/22/23)



([Twitter](#), Posted 1/22/23)

In 2021, Bradley ‘Liked’ A Tweet Promoting The Potential Enforcement Of Vaccines For Domestic Flights

In November 2021, Bradley ‘Liked’ A Tweet Promoting The Potential Enforcement Of Vaccines For Domestic Flights. ([Twitter](#), Posted 11/23/21)

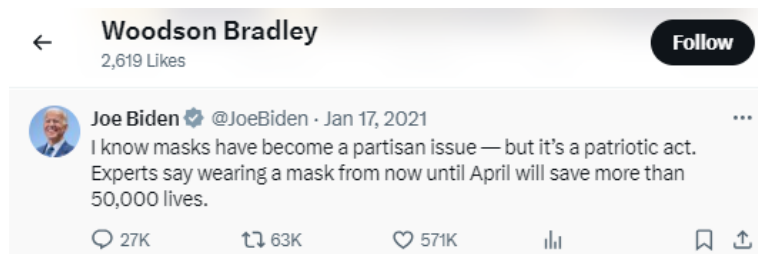


([Twitter](#), Posted 11/23/21)

ON SOCIAL MEDIA, BRADLEY PROMOTED MASKING DURING THE COVID PANDEMIC

In 2021, Bradley ‘Liked’ A Tweet From President Biden Encouraging Others To Wear Masks To “Save More Than 50,000 Lives”

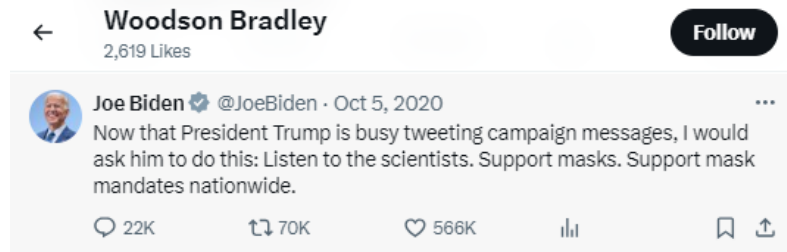
In January 2021, Bradley ‘Liked’ A Tweet From President Biden Encouraging Others To Wear Masks To “Save More Than 50,000 Lives.” ([Twitter](#), Posted 1/17/21)



([Twitter](#), Posted 1/17/21)

In 2020, Bradley ‘Liked’ A Tweet By Joe Biden Urging For President Trump To “Support Mask Mandates Nationwide”

In October 2020, Bradley ‘Liked’ A Tweet By Joe Biden Urging For President Trump To “Support Mask Mandates Nationwide.” ([Twitter](#), Posted 10/5/20)



([Twitter](#), Posted 10/5/20)

In 2020, Bradley Posted To Promote Wearing Masks Outside Of The House

In June 2020, Bradley Posted To Promote Wearing Masks Outside Of The House. ([Instagram](#), Posted 6/24/20)



([Instagram](#), Posted 6/24/20)

ON SOCIAL MEDIA, BRADLEY HAS PROMOTED PARTISAN CONTENT UNBECOMING OF A PUBLIC OFFICIAL

In 2023, Bradley ‘Liked’ A Tweet Denouncing Donald Trump’s Donations Of Clean Water, Goya Beans, And Cleaning Supplies To East Palestine.

In February 2023, Bradley ‘Liked’ A Tweet Denouncing Donald Trump’s Donations Of Clean Water, Goya Beans, And Cleaning Supplies To East Palestine. ([Twitter](#), Posted 2/22/23)



([Twitter](#), Posted 2/22/23)

In 2022, Bradley ‘Liked’ A Tweet Arguing For The Removal And Indictment Of Donald Trump Due To His Responsibility For “The Violent Assault On Paul Pelosi And The Attempt To Murder Speaker Pelosi, And Jan 6”

In October 2022, Bradley ‘Liked’ A Tweet Arguing For The Removal And Indictment Of Donald Trump Due To His Responsibility For “The Violent Assault On Paul Pelosi And The Attempt To Murder Speaker Pelosi, And Jan 6.” ([Twitter](#), Posted 10/28/22)



([Twitter](#), Posted 10/28/22)

In 2022, Bradley ‘Liked’ A Tweet Celebrating “Redacted Mar-A-Lago Search Warrant Affidavit Day”

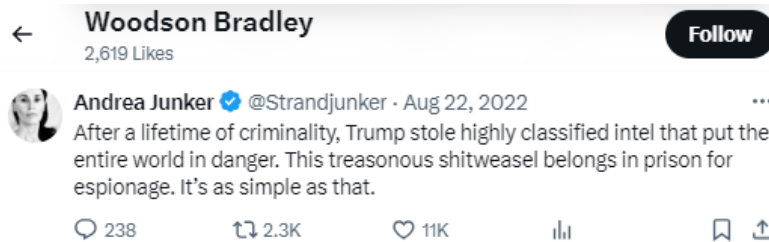
In August 2022, Bradley ‘Liked’ A Tweet Celebrating “Redacted Mar-A-Lago Search Warrant Affidavit Day.” ([Twitter](#), Posted 8/26/22)



([Twitter](#), Posted 8/26/22)

In 2022, Bradley ‘Liked’ A Tweet Arguing For The Imprisonment Of Donald Trump For “Espionage”

In August 2022, Bradley ‘Liked’ A Tweet Arguing For The Imprisonment Of Donald Trump For “Espionage.” ([Twitter](#), Posted 8/22/22)



([Twitter](#), Posted 8/22/22)

In 2022, Bradley ‘Liked’ A Tweet Displaying A Graphic Alleging Donald Trump’s Allegiance Is To Vladimir Putin Over America

In March 2022, Bradley ‘Liked’ A Tweet Displaying A Graphic Alleging Donald Trump’s Allegiance Is To Vladimir Putin Over America. ([Twitter](#), Posted 3/15/22)



([Twitter](#), Posted 3/15/22)

In 2020, Bradley ‘Liked’ Images Depicting And Influencing The Arrests Of Donald Trump And Family Members

In August 2020, Bradley ‘Liked’ Images Depicting And Influencing The Arrests Of Donald Trump And Family Members. ([Twitter](#), Posted 8/8/20)



([Twitter](#), Posted 8/8/20)

In 2020, Bradley ‘Liked’ A Tweet Comparing Trump’s “Attacking And Banning The Press” To That Of Hitler Before He “Started Killing People”

In April 2020, Bradley ‘Liked’ A Tweet Comparing Trump’s “Attacking And Banning The Press” To That Of Hitler Before He “Started Killing People.” ([Twitter](#), Posted 4/9/20)



([Twitter](#), Posted 4/9/20)

In 2023, Bradley ‘Liked’ A Tweet Informing Of New Demands To Subpoena ALL Documents Related To The \$2 Billion That Kushner Received From The Saudi Crown Prince”

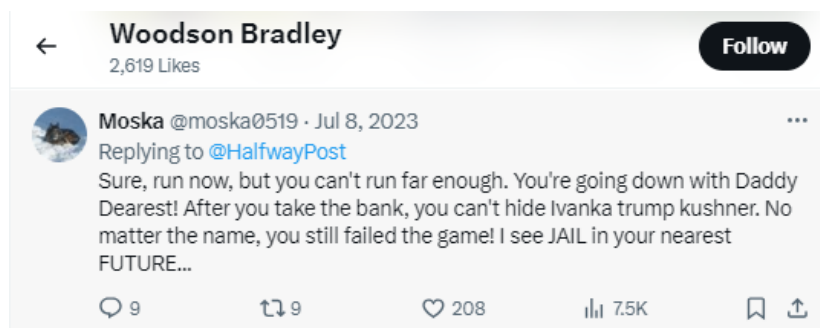
In August 2023, Bradley ‘Liked’ A Tweet Informing Of New Demands To Subpoena ALL Documents Related To The \$2 Billion That Kushner Received From The Saudi Crown Prince.” ([Twitter](#), Posted 8/31/23)



([Twitter](#), Posted 8/31/23)

In 2023, Bradley ‘Liked’ A Tweet Stating “You Can’t Hide Ivanka Trump Kushner. No Matter The Name, You Still Failed The Game! I See JAIL In Your Nearest FUTURE...”

In July 2023, Bradley ‘Liked’ A Tweet Stating “You Can’t Hide Ivanka Trump Kushner. No Matter The Name, You Still Failed The Game! I See JAIL In Your Nearest FUTURE...” ([Twitter](#), Posted 7/8/23)

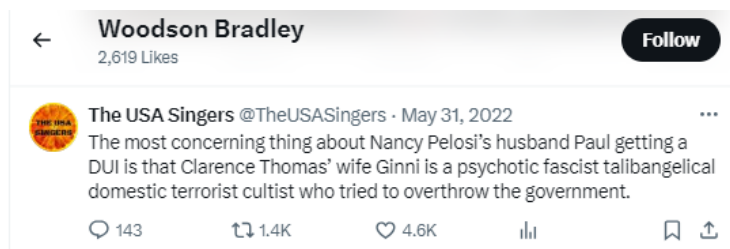


([Twitter](#), Posted 7/8/23)

In 2022, Bradley ‘Liked’ A Tweet Claiming Ginni Thomas Is A “Psychotic Fascist Talibangelical Domestic Terrorist Cultist Who Tried To Overthrow The Government”

In May 2022, Bradley ‘Liked’ A Tweet Claiming Ginni Thomas Is A “Psychotic Fascist Talibangelical Domestic Terrorist Cultist Who Tried To Overthrow The Government.”

([Twitter](#), Posted 5/31/22)



([Twitter](#), Posted 5/31/22)

On Social Media, Bradley Has Promoted Content Condemning The January 6th Capitol Protests

In December 2022, Bradley ‘Liked’ A Tweet Praising The January 6th Committee And Its Efforts To Pursue The Truth. ([Twitter](#), Posted 12/21/22)



([Twitter](#), Posted 12/21/22)

In October 2022, Bradley ‘Liked’ A Tweet Stating When You Convince People That Politicians Are Rigging Elections, Drink Babies Blood, Etc, You Will Get Violence. This Must Be Rejected.” ([Twitter](#), Posted 10/28/22)



([Twitter](#), Posted 10/28/22)

In January 2022, Bradley ‘Liked’ A Tweet Claiming That “Allowing Members Of Congress Who Were Part Of Trump’s Coup Attempt To Remain In Congress Is About As Insane As Allowing A Terrorist To Return To Work In The Same Building They Tried To Blow Up.” ([Twitter](#), Posted 1/1/22)



([Twitter](#), Posted 1/1/22)

In October 2021, Bradley ‘Liked’ A Tweet In Favor Of The January 6 Committee To Issue An Arrest Warrant For Steve Bannon. ([Twitter](#), Posted 10/12/21)

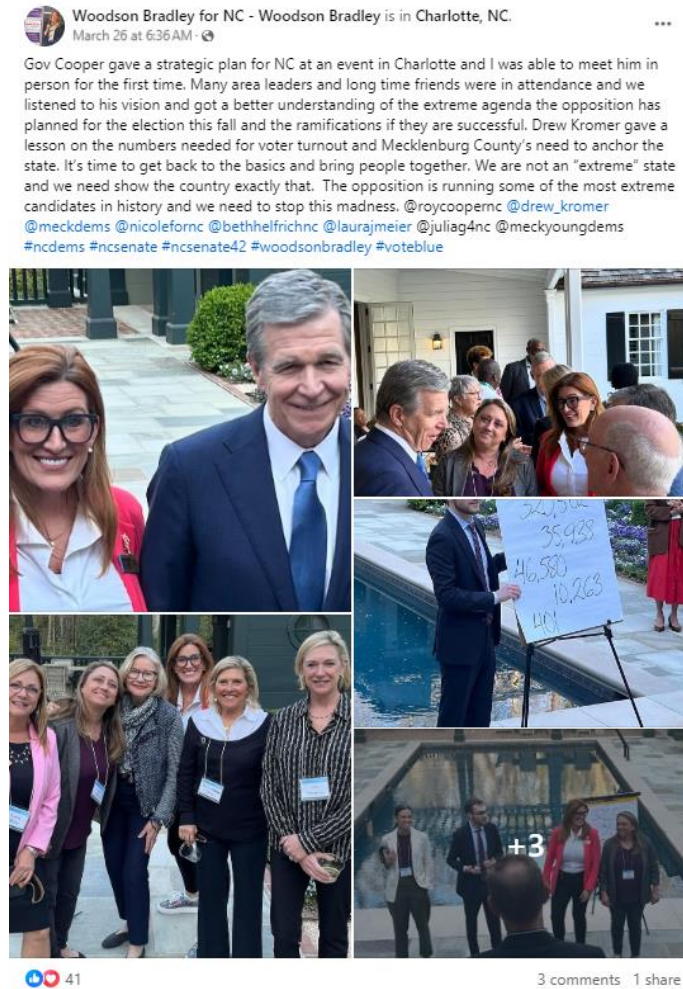


([Twitter](#), Posted 10/12/21)

ON SOCIAL MEDIA, BRADLEY HAS INDICATED SUPPORT FOR PROMINENT LIBERAL FIGURES – INCLUDING BIDEN, COOPER, AND CLINTON

In 2024, Bradley Posted Images Alongside Governor Cooper Stating That He “Gave A Strategic Plan For NC At An Event In Charlotte And I Was Able To Meet Him In Person For The First Time”

In March 2024, Bradley Posted Images Alongside Governor Cooper Stating That He “Gave A Strategic Plan For NC At An Event In Charlotte And I Was Able To Meet Him In Person For The First Time.” ([Facebook](#), Posted 3/26/24)



([Facebook](#), Posted 3/26/24)

In 2022, Bradley 'Liked' A Tweet Commending President Biden And His Christmas Speech, Stating "I'm So Grateful We Have Him"

In December 2022, Bradley 'Liked' A Tweet Commending President Biden And His Christmas Speech, Stating "I'm So Grateful We Have Him." ([Twitter](#), Posted 12/22/22)



([Twitter](#), Posted 12/22/22)

In 2022, Bradley ‘Liked’ A Tweet From Hillary Clinton Claiming That In Contrast To Donald Trump, “The Fact Is That I Had Zero Emails That Were Classified”

In September 2022, Bradley ‘Liked’ A Tweet From Hillary Clinton Claiming That In Contrast To Donald Trump, “The Fact Is That I Had Zero Emails That Were Classified.” ([Twitter](#), Posted 9/6/22)



([Twitter](#), Posted 9/6/22)

**ON SOCIAL MEDIA, BRADLEY HAS PROMOTED CONTENT
CRITICIZING EFFORTS TO INVESTIGATE HUNTER BIDEN**

In 2023, Bradley ‘Liked’ A Tweet Urging Fox News Host Geraldo Rivera To “Fill In His Coworkers Before Fox News Is Sued Yet Again”, After He Posted Remarks That “There Has Been NO Evidence Of Hunter Biden Committing Crimes (Other Than Drug Use)”

In March 2023, Bradley ‘Liked’ A Tweet Urging Fox News Host Geraldo Rivera To “Fill In His Coworkers Before Fox News Is Sued Yet Again”, After He Posted Remarks That “There Has Been NO Evidence Of Hunter Biden Committing Crimes (Other Than Drug Use).” ([Twitter](#), Posted 3/14/23)



([Twitter](#), Posted 3/14/23)

In 2022, Bradley ‘Liked’ A Tweet Stating “Hunter Biden Made \$640 Billion Dollars While Working At The White House For His Dad And He Made Another 2 Billion Dollar Deal With The Saudi Prince. Oh Wait, That Was Ivanka And Jared Under The Trump Presidency”

In May 2022, Bradley ‘Liked’ A Tweet Stating “Hunter Biden Made \$640 Billion Dollars While Working At The White House For His Dad And He Made Another 2 Billion Dollar Deal With The Saudi Prince. Oh Wait, That Was Ivanka And Jared Under The Trump Presidency.” ([Twitter](#), Posted 5/19/22)



([Twitter](#), Posted 5/19/22)

APPENDIX A: ISSUES OF NOTE (BY SUBJECT AREA)

Below is a non-comprehensive reference section pertaining to Woodson Bradley's issues and policy positions of note. Any actionable material from this section has been incorporated into the prior narrative sections.

IMMIGRATION

Illegal Immigration

Abbott Sending Illegal Immigrants To Kamala Harris' Home

In December 2022, Bradley 'Liked' A Tweet Stating "Holy Fucking Shit, What Greg Abbott Did On Christmas Eve Should Be A Fucking Crime." ([Twitter](#), Posted 12/26/22)



([Twitter](#), Posted 12/26/22)

According To Reporting By The National Review, "Three Buses From Texas Dropped Off More Than 100 Migrants Near Vice President Kamala Harris's Home In Washington, D.C." "Three buses from Texas dropped off more than 100 migrants near Vice President Kamala Harris's home in Washington, D.C., on Christmas Eve, the latest in a series of transports this year from border states to Democrat-run cities to the north." ("Busloads Of Migrants From Texas Dropped Off Near Kamala Harris's Home On Christmas Eve," [National Review](#), 12/26/22)

National Review: "In A Christmas Day Statement, The White House Condemned Abbott For Sending The Buses North." "“With thousands of men, women, and children illegally crossing into Texas every day, and with the expectation that those numbers will only increase if Title 42 expulsions end, the state is overburdened as we respond to this disaster caused by you and your administration,” Abbott wrote. “Your policies will leave many people in the bitter, dangerous cold as a polar vortex moves into Texas.” In a Christmas Day statement, the White House condemned Abbott for sending the buses north. “Governor Abbott abandoned children on the side of the road in below-freezing temperatures on Christmas Eve without coordinating with any federal or local authorities,” White House spokesman Abdullah Hasan said, according to the Times. “This was a cruel, dangerous, and shameful stunt.” Amy Fischer, an organizer with the Migrant Solidarity Mutual Aid Network, which received the migrants in Washington, D.C., also called Abbott’s actions cruel, according to ABC-7 News. “People are getting off the buses, they don’t have coats, they don’t have clothes for this kind of weather, and they’re freezing,” she told the Washington, D.C., news station.” (“Busloads Of Migrants From Texas Dropped Off Near Kamala Harris's Home On Christmas Eve,” [National Review](#), 12/26/22)

SOCIAL ISSUES

Abortion

Pro-Choice Associations

Bradley Has Been Endorsed By The Pro-Choice Organization EMILY's List In 2024. 'The following information was released by EMILYs List: Today EMILYs List, the nation's largest resource for women in politics, endorsed eight Democratic pro-choice women for election and reelection to North Carolina's state legislature. EMILYs List Interim President Jessica Mackler released the following statement: "In North Carolina, extremist Republicans have already passed one abortion ban, and if they keep their legislative supermajority they will only further jeopardize our rights. We can't let them win. Making sure women like these eight pro-choice champions get into office and stay in office is at the heart of EMILYs List's mission, and we are honored to stand by each of them. Their dedication to our fundamental freedoms is unmatched." EMILYs List endorsed the following slate of candidates for election and reelection: Lisa Grafstein, NC-SD13 Val Applewhite, NC-SD19 Woodson Bradley, NC-SD42..." (EMILY's List, 2/22/24)

General Support

In December 2023, Bradley 'Liked' A Tweet Noting Kate Cox's Journey To Leave Texas For Abortion Care As "Not Acceptable." ([Twitter](#), Posted 12/11/23)



([Twitter](#), Posted 12/11/23)

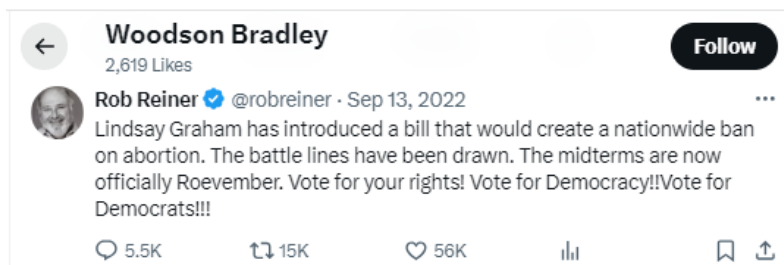
In August 2023, Bradley ‘Liked’ A Tweet Asserting That The Majority Of Abortions Occur Within The Early Time Frames Of Pregnancy And Those Near The Date Of Birth Are “Performed For The Mother’s Sake And Because The Fetus Is Not Viable.” ([Twitter](#), Posted 8/23/23)



([Twitter](#), Posted 8/23/23)

Support For Roe V Wade

In September 2022, Bradley ‘Liked’ A Tweet Against Lindsay Graham’s Introduction Of Nation Wide Abortion Bans, Stating “The Battle Lines Have Been Drawn. The Midterms Are Now Officially Roevenember. Vote For Your Rights! Vote For Democracy!!Vote For Democrats!!!” ([Twitter](#), Posted 9/13/22)



([Twitter](#), Posted 9/13/22)

Second Amendment

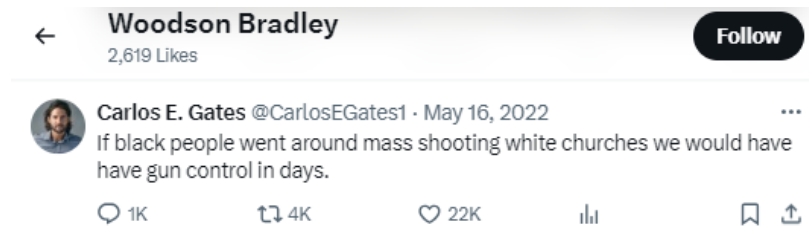
Overall

“Woodson Bradley Got A Concealed Weapons Permit And Owns A Gun. She Supports Measures Like Congress's Bipartisan Act, As Well As Universal Background Checks And Restrictions On Ownership Of Certain Types Of Weapons Or By Age. Says Bradley, "The Second Amendment Mentions Arming A Well-Regulated Militia — Not A Disgruntled Boyfriend Or Husband Having A Bad Day.” ([Good Housekeeping](#), 10/2/22)

- **Of Note, Bradley Recounted Being Threatened With A Firearm During A Domestic Abuse Incident.** “When Woodson Bradley was in her 20s, her boyfriend gradually became more controlling and physically violent. One night during a fight, he dragged her by the hair to the garage and handed her a gun, she says. He held another gun to her head and told her to shoot her beloved border collie, Amos. In her rural neighborhood, no one

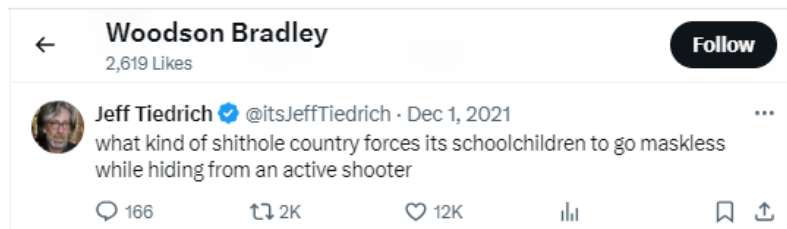
could hear her screams and pleading. Bradley considered her options — if she turned the gun on her boyfriend, she had no idea if the gun was loaded. He got closer to her, so loud and close that she could feel his spit and hot breath on her face, his rage ringing in her ears. "I begged God to forgive me," Bradley said. She pulled the trigger, shaking. Click. Empty. Her boyfriend slapped her face with a backhanded blow, punching and kicking her, calling her vile words for being willing to kill her dog, she says. "I ran away from him like an animal, grabbing everything I could," Bradley says. Later, she discovered the situation is a common abuser's technique — creating horrific conditions where no matter what you choose, it's the wrong choice. She fled the state." ([Good Housekeeping](#), 10/2/22)

In May 2022, Bradley ‘Liked’ A Tweet Asserting The Quick Legislation Of Gun Control “If Black People Went Around Mass Shooting White Churches.” ([Twitter](#), Posted 5/16/22)



([Twitter](#), Posted 5/16/22)

In December 2021, Bradley ‘Liked’ A Tweet Stating “What Kind Of Shithole Country Forces Its Schoolchildren To Go Maskless While Hiding From An Active Shooter.” ([Twitter](#), Posted 12/1/21)



([Twitter](#), Posted 12/1/21)

Race

In December 2022, Bradley ‘Liked’ A Tweet Downplaying Remarks Of Racism And Claims Of White Privilege Aimed At Piers Morgan. ([Twitter](#), Posted 12/16/22)



([Twitter](#), Posted 12/16/22)

LGBTQ**Pride Parade**

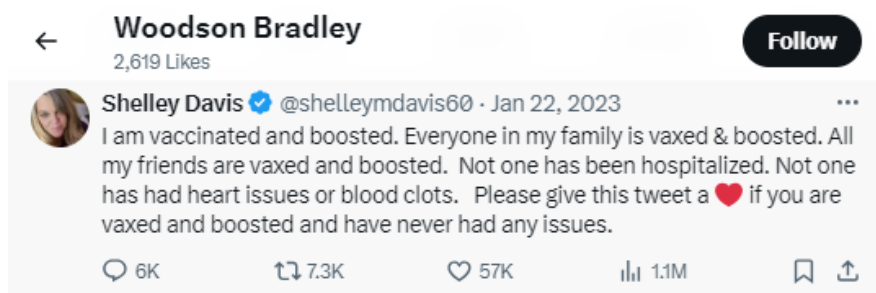
In August 2023, Bradley Posted A Photo Of Himself Dressed To Celebrate The ‘CLT’ Pride Parade With Hashtags “#CLTPride #Prideparade #Love #Loveislove.” ([Instagram](#), Posted 8/20/23)



([Instagram](#), Posted 8/20/23)

Covid -19**Vaccinations**

In January 2023, Bradley ‘Liked’ A Tweet Praising Covid Vaccinations And Booster Shots. ([Twitter](#), Posted 1/22/23)



([Twitter](#), Posted 1/22/23)

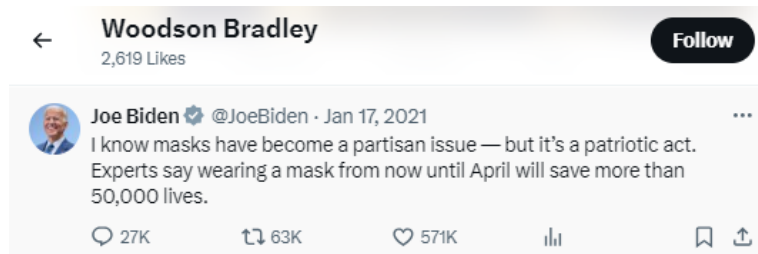
In November 2021, Bradley ‘Liked’ A Tweet Promoting The Potential Enforcement Of Vaccines For Domestic Flights. ([Twitter](#), Posted 11/23/21)



([Twitter](#), Posted 11/23/21)

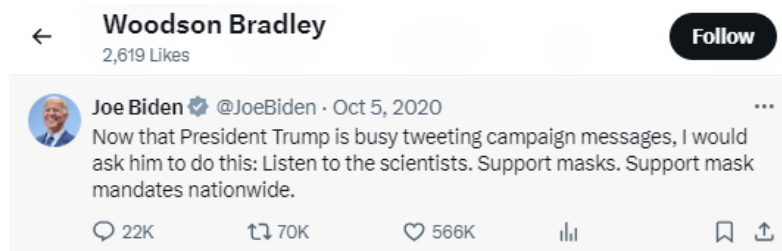
Masking

In January 2021, Bradley ‘Liked’ A Tweet From President Biden Encouraging Others To Wear Masks To “Save More Than 50,000 Lives.” ([Twitter](#), Posted 1/17/21)



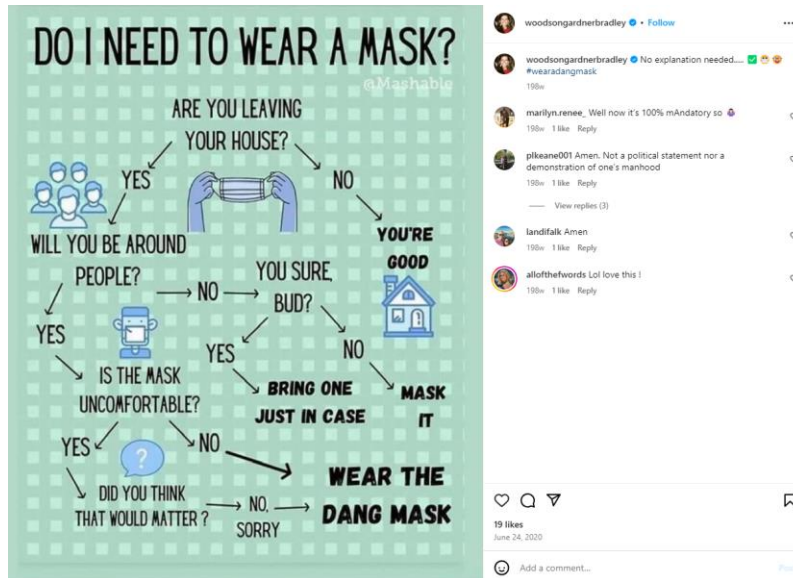
([Twitter](#), Posted 1/17/21)

In October 2020, Bradley ‘Liked’ A Tweet By Joe Biden Urging For President Trump To “Support Mask Mandates Nationwide.” ([Twitter](#), Posted 10/5/20)



([Twitter](#), Posted 10/5/20)

In June 2020, Bradley Posted To Promote Wearing Masks Outside Of The House. ([Instagram](#), Posted 6/24/20)



([Instagram](#), Posted 6/24/20)

POLITICAL

Notable Republican Criticism

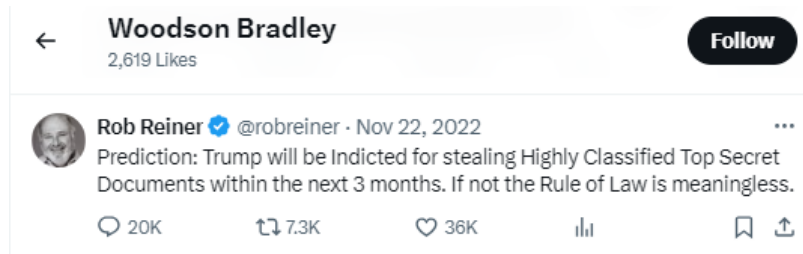
Donald Trump

In February 2023, Bradley ‘Liked’ A Tweet Denouncing Donald Trump’s Donations Of Clean Water, Goya Beans, And Cleaning Supplies To East Palestine. ([Twitter](#), Posted 2/22/23)



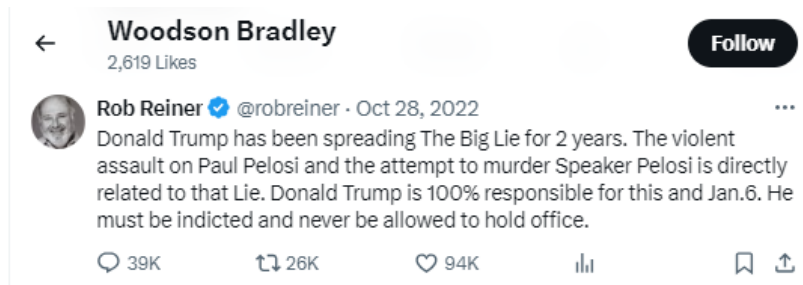
([Twitter](#), Posted 2/22/23)

In November 2022, Bradley ‘Liked’ A Tweet Claiming That The “Rule Of Law Is Meaningless” Be It Trump Is Not “Indicted For Stealing Highly Classified Top Secret Documents Within The Next 3 Months.” ([Twitter](#), Posted 11/22/22)



([Twitter](#), Posted 11/22/22)

In October 2022, Bradley ‘Liked’ A Tweet Arguing For The Removal And Indictment Of Donald Trump Due To His Responsibility For “The Violent Assault On Paul Pelosi And The Attempt To Murder Speaker Pelosi, And Jan 6.” ([Twitter](#), Posted 10/28/22)



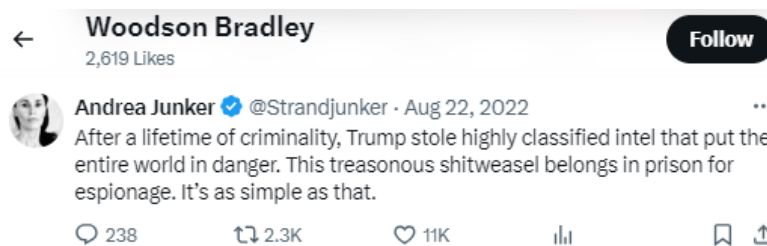
([Twitter](#), Posted 10/28/22)

In August 2022, Bradley ‘Liked’ A Tweet Celebrating “Redacted Mar-A-Lago Search Warrant Affidavit Day.” ([Twitter](#), Posted 8/26/22)



([Twitter](#), Posted 8/26/22)

In August 2022, Bradley ‘Liked’ A Tweet Arguing For The Imprisonment Of Donald Trump For “Espionage.” ([Twitter](#), Posted 8/22/22)



([Twitter](#), Posted 8/22/22)

In March 2022, Bradley ‘Liked’ A Tweet Displaying A Graphic Alleging Donald Trump’s Allegiance Is To Vladimir Putin Over America. ([Twitter](#), Posted 3/15/22)



([Twitter](#), Posted 3/15/22)

In August 2020, Bradley ‘Liked’ Images Depicting And Influencing The Arrests Of Donald Trump And Family Members. ([Twitter](#), Posted 8/8/20)



([Twitter](#), Posted 8/8/20)

In April 2020, Bradley ‘Liked’ A Tweet Comparing Trump’s “Attacking And Banning The Press” To That Of Hitler Before He “Started Killing People.” ([Twitter](#), Posted 4/9/20)



([Twitter](#), Posted 4/9/20)

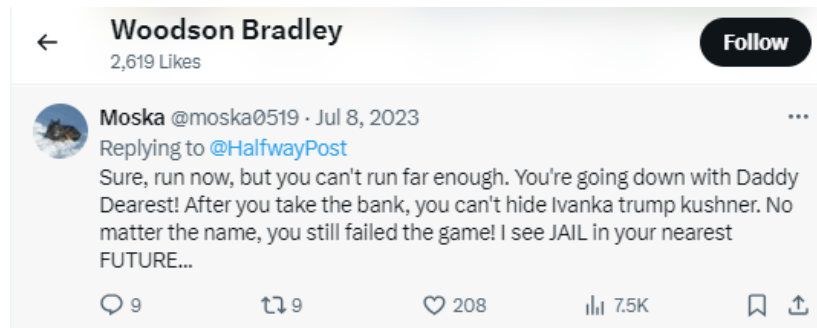
Jared Kushner

In August 2023, Bradley ‘Liked’ A Tweet Informing Of New Demands To Subpoena ALL Documents Related To The \$2 Billion That Kushner Received From The Saudi Crown Prince.” ([Twitter](#), Posted 8/31/23)



([Twitter](#), Posted 8/31/23)

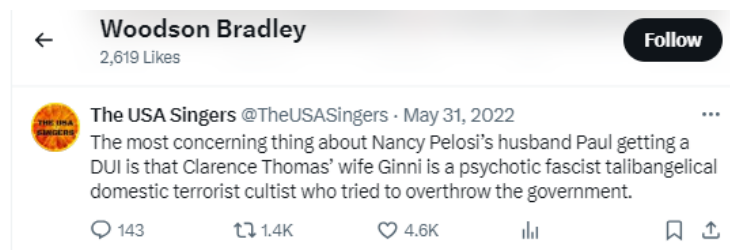
In July 2023, Bradley ‘Liked’ A Tweet Stating “You Can’t Hide Ivanka Trump Kushner. No Matter The Name, You Still Failed The Game! I See JAIL In Your Nearest FUTURE...” ([Twitter](#), Posted 7/8/23)



([Twitter](#), Posted 7/8/23)

Ginni Thomas

In May 2022, Bradley ‘Liked’ A Tweet Claiming Ginni Thomas Is A “Psychotic Fascist Talibangelical Domestic Terrorist Cultist Who Tried To Overthrow The Government.” ([Twitter](#), Posted 5/31/22)

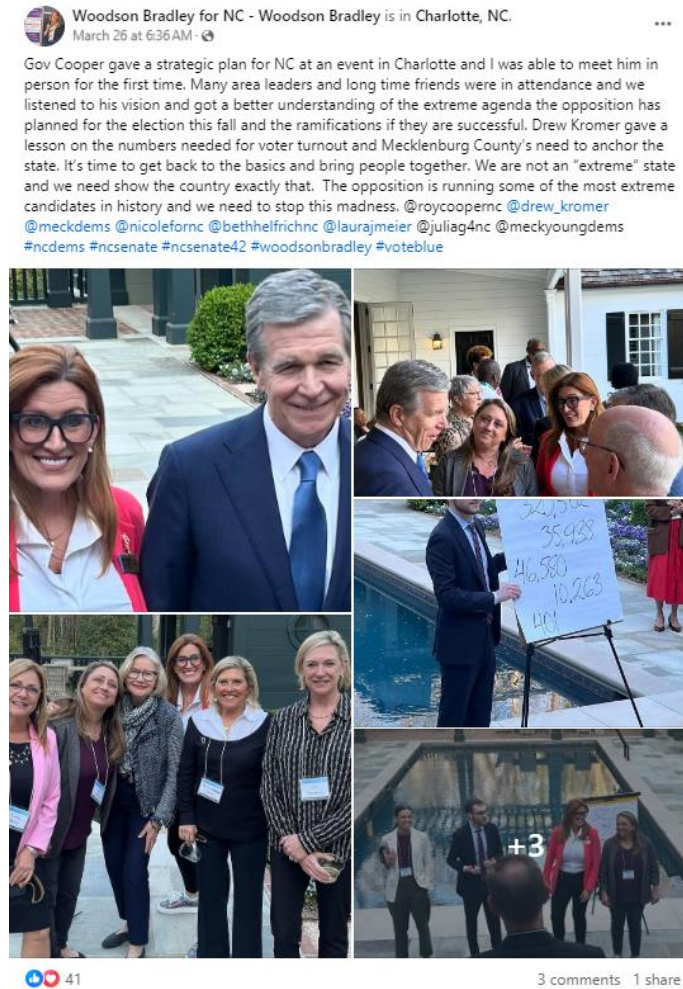


([Twitter](#), Posted 5/31/22)

Notable Democratic Praise

Roy Cooper

In March 2024, Bradley Posted Images Alongside Governor Cooper Stating That He “Gave A Strategic Plan For NC At An Event In Charlotte And I Was Able To Meet Him In Person For The First Time.” ([Facebook](#), Posted 3/26/24)



([Facebook](#), Posted 3/26/24)

Joe Biden

In December 2022, Bradley ‘Liked’ A Tweet Commending President Biden And His Christmas Speech, Stating “I’m So Grateful We Have Him.” ([Twitter](#), Posted 12/22/22)



([Twitter](#), Posted 12/22/22)

Hillary Clinton

In September 2022, Bradley ‘Liked’ A Tweet From Hillary Clinton Claiming That In Contrast To Donald Trump, “The Fact Is That I Had Zero Emails That Were Classified.” ([Twitter](#), Posted 9/6/22)



([Twitter](#), Posted 9/6/22)

Hunter Biden Investigation

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([Twitter](#), Posted 5/19/22)

January 6th Capitol Protests

In December 2022, Bradley ‘Liked’ A Tweet Praising The January 6th Committee And Its Efforts To Pursue The Truth. ([Twitter](#), Posted 12/21/22)



([Twitter](#), Posted 12/21/22)

In October 2022, Bradley ‘Liked’ A Tweet Stating When You Convince People That Politicians Are Rigging Elections, Drink Babies Blood, Etc, You Will Get Violence. This Must Be Rejected.” ([Twitter](#), Posted 10/28/22)



([Twitter](#), Posted 10/28/22)

In January 2022, Bradley ‘Liked’ A Tweet Claiming That “Allowing Members Of Congress Who Were Part Of Trump’s Coup Attempt To Remain In Congress Is About As Insane As Allowing A Terrorist To Return To Work In The Same Building They Tried To Blow Up.” ([Twitter](#), Posted 1/1/22)



([Twitter](#), Posted 1/1/22)

In October 2021, Bradley ‘Liked’ A Tweet In Favor Of The January 6 Committee To Issue An Arrest Warrant For Steve Bannon. ([Twitter](#), Posted 10/12/21)



([Twitter](#), Posted 10/12/21)

2016 Election Fraud

In August 2022, Bradley ‘Liked’ A Tweet Stating “Trump Is Demanding A Redo Of The 2020 Election. Cool. I Demand A Redo Of The 2016 Election.” ([Twitter](#), Posted 8/30/22)



([Twitter](#), Posted 8/30/22)

PERSONAL

Additional Background Notes

Personal Life Claims – Dedication To Public Service

On Her Campaign Site, Bradley Claims Her “Entire Life Has Been Dedicated To Public Service, Volunteerism, Advocacy, And Being A Community Leader.” “Woodson is a mom, wife, business owner, community leader, and tireless volunteer. She is the daughter of a career public school teacher and social worker who went on to work in the Juvenile Court System. Community Service is how she grew up, who she is now, and what her new family is known for. Her entire life has been dedicated to public service, volunteerism, advocacy, and being a community leader. Woodson graduated from Hollins University in 1995 with a degree in Economics and Business Administration. She also studied Environmental Economics abroad at the University of Sydney in Australia and worked as an elementary teacher through a Rotary Service Project in Lucea Bay, Jamaica. She understands the importance of business growth and public service and more importantly, why they should go hand-in-hand.” ([Woodson Bradley](#), Accessed 4/10/24)

W H O I S W O O D S O N ?

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([Woodson Bradley](#), Accessed 4/10/24)

“Woodson Has Dedicated Her Life To Public And Community Service.” “Woodson has dedicated her life to public and community service. She's running to bring that record of public and community service to the NC Senate District 42. She is also Mecklenburg County Democratic Precinct Chair for Precinct 140. She is a domestic violence survivor and advocate for families, children, and teens across NC. She currently speaks for the Mecklenburg County Domestic Violence Speakers Bureau. Woodson speaks in CMS schools for teen dating violence prevention for Love Speaks Out. She's on the planning board as a survivor voice for the Mecklenburg County Family Justice Center, known as the Umbrella Center. She has appeared in Public Service Announcements and videos for Safe Alliance, and has been featured in social media for Jamie Kimble Foundation For Courage. Woodson is a vibrant and active member of the Rotary Club of Charlotte. She serves on various Rotary Committees and is an ambassador for volunteer opportunities across Charlotte. She regularly volunteers loading teachers' cars with

supplies at Classroom Central. She has planted trees across our county with Trees for Charlotte, and served Christmas Breakfast with her family at the Charlotte Rescue Mission.” ([Woodson Bradley](#), Accessed 4/10/24)

A RECORD OF SERVICE

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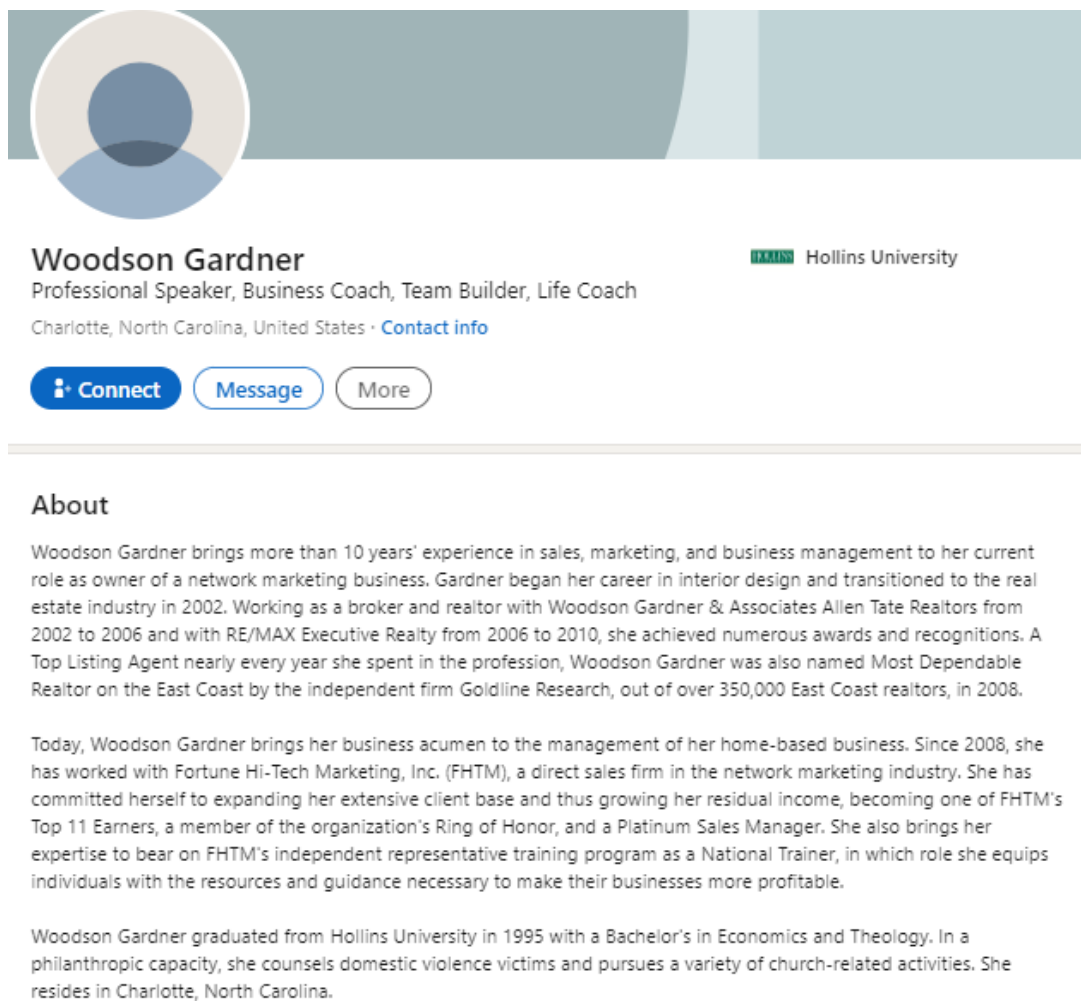
([Woodson Bradley](#), Accessed 4/10/24)

Business And Professional Controversies

Promotion Of MLM/ Pyramid Scheme – FHTM (National Sales Manager)

Bradley Was Extensively Involved With FHTM And Touted Her Roles As “One Of FHTM's Top 11 Earners, A Member Of The Organization's Ring Of Honor, And A Platinum Sales Manager”; Bradley Also Brought “Her Expertise To Bear On FHTM's Independent Representative Training Program As A National Trainer, In Which Role She Equips Individuals With The Resources And Guidance Necessary To Make Their Businesses More Profitable.” “Woodson Gardner brings more than 10 years' experience in sales, marketing, and business management to her current role as owner of a network marketing business. Gardner began her career in interior design and transitioned to the real estate industry in 2002. Working as a broker and realtor with Woodson Gardner & Associates Allen Tate Realtors from 2002 to 2006 and with RE/MAX Executive Realty from 2006 to 2010, she achieved numerous awards and recognitions. A Top Listing Agent nearly every year she spent in the profession, Woodson Gardner was also named Most Dependable Realtor on the East Coast by the independent firm Goldline Research, out of over 350,000 East Coast realtors, in 2008. Today, Woodson Gardner brings her business acumen to the management of her home-based business. Since 2008, she has worked with Fortune Hi-Tech Marketing, Inc. (FHTM), a direct sales firm in the network marketing industry. She has committed herself to expanding her extensive client base and thus growing her residual income, becoming one of FHTM's Top 11 Earners, a member of the organization's Ring of Honor, and a Platinum Sales Manager. She also

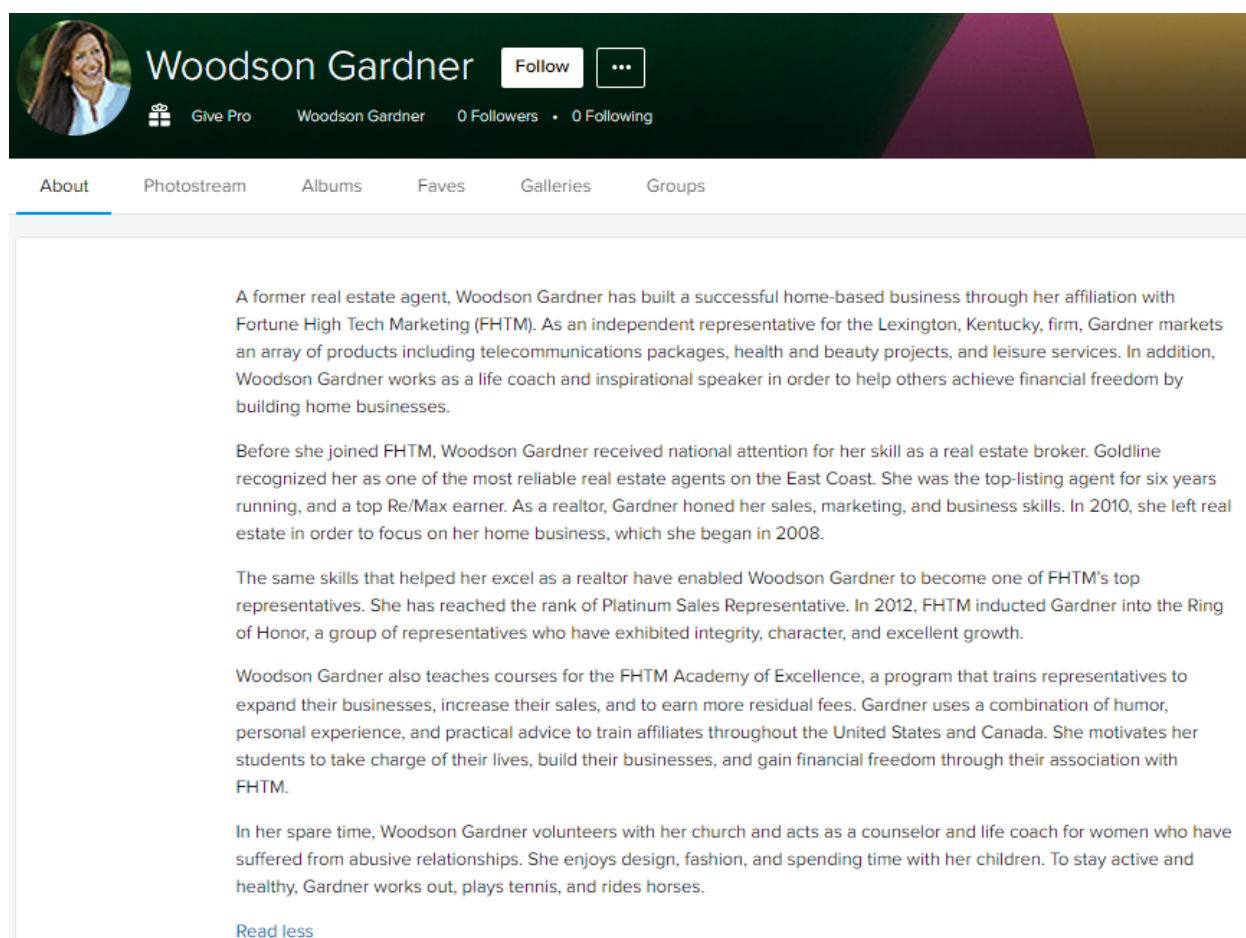
brings her expertise to bear on FHTM's independent representative training program as a National Trainer, in which role she equips individuals with the resources and guidance necessary to make their businesses more profitable. Woodson Gardner graduated from Hollins University in 1995 with a Bachelor's in Economics and Theology. In a philanthropic capacity, she counsels domestic violence victims and pursues a variety of church-related activities. She resides in Charlotte, North Carolina.” ([LinkedIn](#), Accessed 4/10/24)



([LinkedIn](#), Accessed 4/10/24)

- **“Gardner Uses A Combination Of Humor, Personal Experience, And Practical Advice To Train Affiliates Throughout The United States And Canada. She Motivates Her Students To Take Charge Of Their Lives, Build Their Businesses, And Gain Financial Freedom Through Their Association With FHTM.”** “A former real estate agent, Woodson Gardner has built a successful home-based business through her affiliation with Fortune High Tech Marketing (FHTM). As an independent representative for the Lexington, Kentucky, firm, Gardner markets an array of products including telecommunications packages, health and beauty projects, and leisure services. In addition, Woodson Gardner works as a life coach and inspirational speaker in order to help others achieve financial freedom by building home businesses. Before she joined

FHTM, Woodson Gardner received national attention for her skill as a real estate broker. Goldline recognized her as one of the most reliable real estate agents on the East Coast. She was the top-listing agent for six years running, and a top Re/Max earner. As a realtor, Gardner honed her sales, marketing, and business skills. In 2010, she left real estate in order to focus on her home business, which she began in 2008. The same skills that helped her excel as a realtor have enabled Woodson Gardner to become one of FHTM's top representatives. She has reached the rank of Platinum Sales Representative. In 2012, FHTM inducted Gardner into the Ring of Honor, a group of representatives who have exhibited integrity, character, and excellent growth. Woodson Gardner also teaches courses for the FHTM Academy of Excellence, a program that trains representatives to expand their businesses, increase their sales, and to earn more residual fees. Gardner uses a combination of humor, personal experience, and practical advice to train affiliates throughout the United States and Canada. She motivates her students to take charge of their lives, build their businesses, and gain financial freedom through their association with FHTM. In her spare time, Woodson Gardner volunteers with her church and acts as a counselor and life coach for women who have suffered from abusive relationships. She enjoys design, fashion, and spending time with her children. To stay active and healthy, Gardner works out, plays tennis, and rides horses." ([Flickr](#), Accessed 4/10/24)



Woodson Gardner Follow ...

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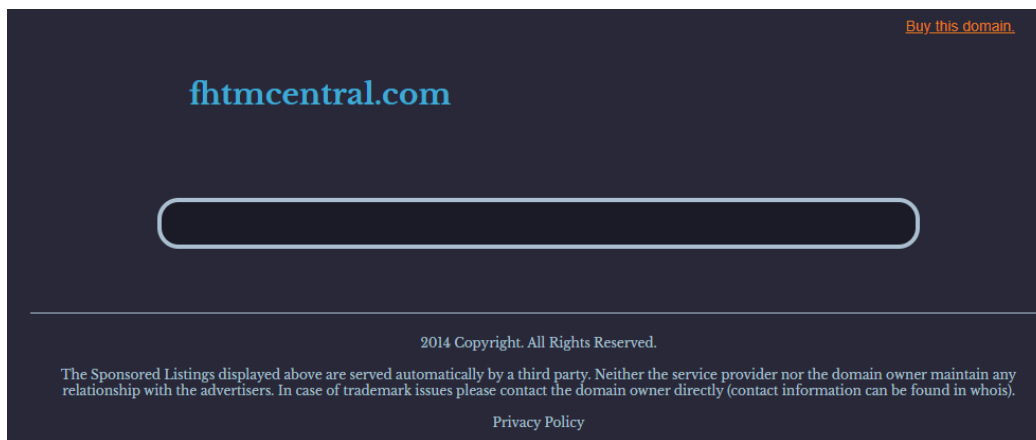
([Flickr](#), Accessed 4/10/24)

- **“A Former Real Estate Agent, Woodson Gardner Has Built A Successful Home-Based Business Through Her Affiliation With Fortune High Tech Marketing (FHTM).”** ([Twitter](#), Accessed 4/10/23)



([Twitter](#), Accessed 4/10/23)

- **NOTE 1:** *Bradley's former personal site WOODSONGARDNER.COM links back to FHTMCENTRAL.COM:* <https://web.archive.org/>



([WoodsonBradley.com](#), Archived 12/28/14)

- **NOTE 2:** Bradley hosted another website called *Fortune Warriors* where she posted tips on how to prospect for potential FHTM representatives:
<http://fortunewarriors.weebly.com/woodson-gardner.html>



([Fortune Warriors](#), Accessed 4/10/24)

VIDEO: In 2012, Bradley Produced A Promotional Video For FHTM Canada And Introduced Herself Noting “Hey Everybody! I’m Woodson Gardner. National Sales Manager But Also National Trainer.” ([YouTube](#), 2/2/12)



Woodson Gardner on FHTM Academy of Excellence



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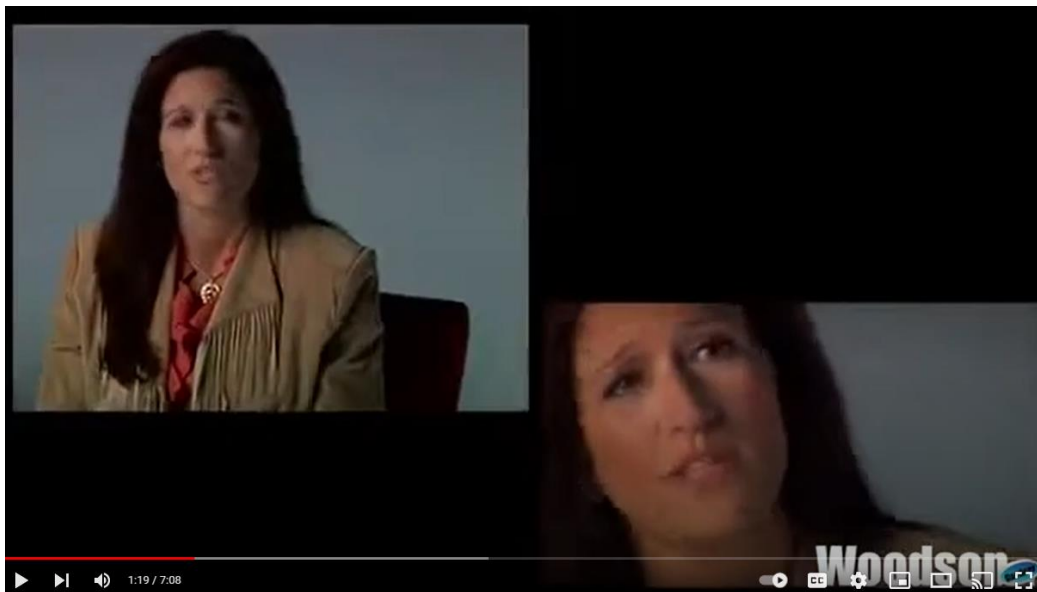
([YouTube](#), 2/2/12)

VIDEO: In 2017, Bradley Posted A Video Noting Her Presentation At The 2012 Vision Canada Event; Bradley Is Noted As The “National Sales Manager” Of FHTM; Bradley Used Her Speech To Note The Alleged Personal Financial Benefits Of FHTM. ([YouTube](#), Posted 2/27/17)



([YouTube](#), Posted 2/27/17)

- **VIDEO: Bradley Posted A Personal Video Touting FHTM And Denying Accusations That The Company Was A Scam Directly Declaring “We’re Not A Scam. We’re Not A Scheme Or Anything Of The Sort.”** ([YouTube](#), 2/27/17)



([YouTube](#), 2/27/17)

- **VIDEO: Bradley Posted A Personal Video Of Herself Noting Her Involvement In And Promotion Of FHTM As A Means Of Personal Financial Independence.** ([YouTube](#), Posted 2/27/17)



([YouTube](#), Posted 2/27/17)

- **VIDEO: In 2012, FHTM Released A Video Commemorating Bradley’s Induction Into The Company’s Ring Of Honor; Bradley Touted Her Experiences With The Company.** ([YouTube](#), 9/6/12)



FHTM Lifestyle: Ring of Honor Woodson Gardner

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([YouTube](#), 9/6/12)

In 2010, Montana Regulators Filed Legal Action Against FHTM Accusing The Company Of Being A “Pyramid Scheme” After Having Previously Fined The Company \$1 Million Over Its Business Practices. “Marie Richardson of Daytona Beach, Fla., has never been as

excited about a business opportunity as she is about her new work for Fortune Hi-Tech Marketing. In her first week and a half as an independent sales representative this summer, she earned \$800 in bonuses for recruiting four customers who agreed to pay a fee to become salespeople and buy or sell products. Kimberly Asper of Missoula, Mont., however, says she sometimes has to feed her family cereal or ramen noodles for dinner since she was laid off from a job and spent thousands trying to build a business through Fortune. She soon realized it was all about "signing people up." Richardson was one of several thousand salespeople who gathered here last month for a Fortune conference to learn how to recruit people and sell products including cellphone service and private-label vitamins for the company, which Fortune's top money earner, Ruel Morton, calls "the most lucrative financial opportunity in the history of the country." Asper, meanwhile, was one of the Montanans whose complaints led to a lawsuit filed by the state securities commissioner and settlement that required Fortune to tell current and new representatives that no compensation will be paid for recruitment. Fortune paid \$1 million to settle the charges, including \$840,000 to reimburse Montanans, but did not admit wrongdoing. Multilevel or "network" marketing pays commissions to salespeople for the products they sell, on products sold by others they recruit, and often bonuses when their teams reach a certain level of sales. The Direct Selling Association, which represents companies that have multilevel compensation plans, estimates there were about 16.1 million of these "direct" salespeople in the U.S. last year, up from 15.1 million in 2008, thanks to high unemployment and the need for many to supplement incomes. Avon, Amway and Mary Kay Cosmetics are among the largest companies in multilevel marketing, but there are hundreds of lesser-known businesses that sell everything from jewelry to cellphone service. Critics of Fortune, including the Montana Commissioner of Securities and the plaintiffs in a new lawsuit seeking class-action status, say Fortune is a "pyramid scheme" because salespeople are primarily paid for recruiting, not product sales, and more recent recruits can't earn anything close to what the early entrants do. Fortune has until Nov. 2 to respond to the lawsuit seeking class-action status. "Presidential ambassadors" such as Morton average \$1,240,992 in income a year, yet make up just 0.07% of the company's representatives, according to a financial disclosure Fortune filed as part of its April settlement with Montana. The statement also shows 30% of Fortune representatives make nothing, and 54% of those with earnings average just \$93 a month, before costs. More than 99% of those who make money earn less than \$31,524 a year." ([USA Today](#), 10/15/10)

“In January 2013, The FTC And The States Charged The Fortune Hi-Tech Marketing (FHTM) Defendants With Deceiving Consumers By Claiming They Would Earn Significant Income Through Selling Various Products And Services If They Signed Up As FHTM Representatives.” “The operators of a Kentucky-based pyramid scheme, which enrolled more than 350,000 consumers throughout the United States, Puerto Rico and Canada in the last four years, have been banned from multi-level marketing under a settlement with the Federal Trade Commission and the states of Illinois, Kentucky and North Carolina. The settlement also requires the operators to surrender assets totaling at least \$7.75 million, which will be returned to consumers. In January 2013, the FTC and the states charged the Fortune Hi-Tech Marketing (FHTM) defendants with deceiving consumers by claiming they would earn significant income through selling various products and services if they signed up as FHTM representatives.” ([FTC](#), 5/13/14)

- **“At The Request Of The Federal Trade Commission And The States Of Illinois, Kentucky, And North Carolina, A Federal Court Has Halted An Allegedly Illegal Pyramid Scheme Pending Trial. The FTC And The State Attorneys General Seek To Stop The Allegedly Illegal Practices Of The Fortune Hi-Tech Marketing (FHTM) Operation, Which Claimed Consumers Would Make Substantial Income By Joining The Scheme.”** “At the request of the Federal Trade Commission and the states of Illinois, Kentucky, and North Carolina, a federal court has halted an allegedly illegal pyramid scheme pending trial. The FTC and the state attorneys general seek to stop the allegedly illegal practices of the Fortune Hi-Tech Marketing (FHTM) operation, which claimed consumers would make substantial income by joining the scheme. The operation affected more than 100,000 consumers throughout the United States, including Puerto Rico, and Canada. In some areas, including Chicago, the scheme targeted Spanish-speaking consumers. “Pyramid schemes are more like icebergs,” said C. Steven Baker, Director of the FTC’s Midwest Region. “At any point most people must and will be underwater financially. These defendants were promising people that if they worked hard they could make lots of money. But it was a rigged game, and the vast majority of people lost money.” ([FTC](#), 1/28/13)
- **“According To The Complaint Filed By The FTC And The State Attorneys General, The Defendants Falsely Claimed Consumers Would Earn Significant Income For Selling The Products And Services Of Companies Such As Dish Network, Frontpoint Home Security, And Various Cell Phone Providers, And For Selling FHTM’s Line Of Health And Beauty Products.”** “According to the complaint filed by the FTC and the state attorneys general, the defendants falsely claimed consumers would earn significant income for selling the products and services of companies such as Dish Network, Frontpoint Home Security, and various cell phone providers, and for selling FHTM’s line of health and beauty products. Despite FHTM’s claims, nearly all consumers who signed up with the scheme lost more money than they ever made. To the extent that consumers could make any income, however, it was mainly for recruiting other consumers, and FHTM’s compensation plan ensured that most consumers made little or no money, the complaint alleged.” ([FTC](#), 1/28/13)
- **“As Alleged In The Complaint, FHTM Promoted Itself As A Way For Average People To Achieve Financial Independence.”** “As alleged in the complaint, FHTM promoted itself as a way for average people to achieve financial independence. Some FHTM representatives claimed they earned more than 10 times as much as their previous earnings in their second and subsequent years with FHTM. One person claimed that another representative earned more than \$50,000 in his sixth month and millions of dollars in subsequent years. Another person promoted a recruitment meeting on her Twitter account, stating, “Bring ur friends & learn how 2 make \$120K aYR.” At its 2012 national convention in Dallas, FHTM called its top 30 earners to the stage to present them with a mock-up of a \$64 million check, which several of them shared as a photo on social networking websites. To participate in the scheme, consumers paid annual fees ranging from \$100 to \$300. To qualify for sales commissions and recruiting bonuses, they had to pay an extra \$130 to \$400 per month and agree to a continuity plan that billed them monthly for products unless they canceled the plan. Those who signed up more consumers and maintained certain sales levels could earn promotions and greater

compensation, but contrary to FHTM's claims, the complaint alleged, its compensation plan ensured that, at any given time, most participants would spend more money than they would earn." ([FTC](#), 1/28/13)

- **NOTE 1: The FTC's 2013 Legal Filing Against FHTM Directly Cited Gardner's Advertising Practices Regarding Recruitment Bonuses As An Example Of Deceptive Practices By The Company.** (13cv578, [U.S. District Court For The Northern District Of Illinois Eastern Division](#), 1/24/13)

Recruitment bonuses. Product commissions are dwarfed by the recruitment bonuses offered by FHTM, which increase as the representative rises through the ranks of the FHTM compensation plan. Under the current compensation plan, for example, Regional Sales Managers will be paid at least \$100 for each new person in their downlines, while National Sales Managers will be paid at least \$190.⁴⁷ These bonuses accrue for unlimited levels in the representative's downline, and will be paid all the way through the new representative's upline. FHTM also doubles these bonus payments when the representative is particularly successful at recruiting in a certain month.⁴⁸

II. Defendants' Earnings Claims Are False and Violate the Law

FHTM dangles the promise of riches in order to lure consumers into joining its scheme. FHTM makes these promises in a variety of ways – through in-person presentations, pre-

⁴⁵ After Darla DiGrandi recently left FHTM for another MLM, she justified her decision: "There is no fee to join, it's a volume only company. Instead of buying multiple taxbots, amusement pack and raodside [sic], we buy something we can actually use. LOL." PX 1, Menjivar ¶ 89, Att. AAAAA at p. 2.

⁴⁶ PX 1, Menjivar ¶ 7(O), Att. O (over \$38 million paid in commissions in 2010-11, but more than \$32 million of that was for recruitment bonuses); PX 2, Vander Nat ¶ 8 (88% of FHTM payments classified as some type of recruitment bonus).

⁴⁷ PX 1, Menjivar ¶ 10(P)(iii), Att. YY at p. 12.

⁴⁸ PX 1, Menjivar ¶ 10(P)(iii), Att. YY at p. 12 (September 2012 Compensation Plan); *id.* ¶ 34, Att. EEE at pp. 14 (National Sales Manager **Woodson Gardner** describes the doubling of the bonus: "Remember those \$100 bills, well now they just went to 200, 200, 200, 200, 200, 200, 200, 200."); *id.* ¶ 65(B), Att. EEEE at p. 10 (Brock Keen explains, "If your business is growing enough to where you're hitting those double bonuses, those 100s turn to 200s, the 60s turn to 120s, and the 30s turn to 60s and your residual doubles also for that month.").

(13cv578, [U.S. District Court For The Northern District Of Illinois Eastern Division](#), 1/24/13)

- **NOTE 2: The FTC's 2013 Legal Filing Against FHTM Directly Cited Gardner's Advertising Practices Regarding Compensation Amounts As An Example Of Deceptive Practices By The Company.** (13cv578, [U.S. District Court For The Northern District Of Illinois Eastern Division](#), 1/24/13)

Paul Orberson, FHTM's leader, recognizes that FHTM's main marketing tool is the promise that consumers will earn significant money by joining FHTM. At FHTM's most recent national convention, FHTM paraded its top thirty earners on stage with mock-up of a \$64 million check. Orberson explained that "it seems to be in our industry that's what people kind of gravitate toward is those big checks, seeing how much these people have earned and here's what so-and-so has earned, here's what so-and-so has earned in his time or her time in the company, and that's great."⁵⁸ Orberson has set the tone for the entire company in making such outlandish earnings claims.

Following Orberson's example, FHTM representatives regularly recruit by telling consumers exactly how much money they and others have earned in FHTM – the clear message being that anybody signing up with FHTM will be able to replicate these earnings. For example, one of FHTM's most influential Presidential Ambassadors recently bragged on Twitter that he had made more than \$5 million through FHTM,⁵⁹ another Presidential Ambassador claimed to have "earned millions of dollars in this company,"⁶⁰ and a third Presidential Ambassador told audiences that FHTM provides him with a "five-figure monthly income."⁶¹ A Platinum Sales

⁵⁸ PX 1, Menjivar ¶ 78, Att. QQQQ at p. 22. National Sales Manager Woodson Gardner sent out a photo of the check via Twitter. *Id.* ¶ 88(A) & Att. ZZZZ at p. 34. On stage at the prior year's national convention, Orberson told the story of a Presidential Ambassador who "was washing dishes at a Marriott hotel five, six years ago, and he's a millionaire in this business five, six, seven years later." *Id.* ¶ 36, Att. HHH at p. 7.

(13cv578, [U.S. District Court For The Northern District Of Illinois Eastern Division](#), 1/24/13)

- **NOTE 3: The FTC's 2013 Legal Filing Against FHTM Directly Cited Gardner's Claims Regarding Purchasing Bundles For Representatives As An Example Of Deceptive Practices By The Company.** (13cv578, [U.S. District Court For The Northern District Of Illinois Eastern Division](#), 1/24/13)

bare minimum of products or services, and they are provided with the simplest way to do that – by purchasing bundles.¹²² A Presidential Ambassador summed it up well at the 2011 FHTM national convention: “If you want to get rich in real estate, sell a house . . . If you want to get rich in Fortune, sign a rep.”¹²³

C. FHTM Pays Lip Service to Anti-Pyramid Scheme Rules

On paper, FHTM has adopted some policies that pretend to achieve the goal of the *Amway* defenses. However, these policies are not enforced and FHTM encourages its representatives to evade them. For example, FHTM says that (1) representatives may return some unused products to FHTM; (2) representatives must make a majority of their sales to someone other than themselves; and (3) 70% of the products or services a representative buys each month must be sold to third parties outside FHTM or used by the representative during the course of the month.¹²⁴

FHTM does nothing to enforce these rules. Unlike *Amway*, FHTM charges a 10% restocking fee on the products it will even allow a representative to return, requires the representative to return any compensation they earned as a result of buying the products, and the

virtually no incentive to buy or sell more than 15 products a month to maximize FHTM's pay structure (*Id.*).

¹²² PX 1, Menjivar ¶ 54(B), Att. UU at p. 49 (National Sales Manager Woodson Gardner says that “the most customer points you’ll ever need is 15”); *id.* ¶ 70(A), Att. IIII at p. 14 (Scott Aguilar says that he has “16 customers on a report, 14 of them are just us”); *id.* ¶ 66(D) & Att. FFFF at p. 9 (“I know most of you listening to this already have your ten-point starter pack because most everybody starts exactly the way they need to maximize the pay plan. There’s no other good way to start if you’re not going to maximize everything.”); *id.* ¶ 64, Att. DDDD at p. 39 (suggesting people buy a bundle even if they don’t like what is in it just so that they can qualify their business).

(13cv578, [U.S. District Court For The Northern District Of Illinois Eastern Division](#), 1/24/13)

- **“In Addition To Charging The Defendants With Operating An Illegal Pyramid Scheme And Making False Earnings Claims, The FTC Charged Them With Furnishing Consumers With False And Misleading Materials For Recruiting More Participants.”** “According to the complaint, recruits were told they could earn high commissions by selling products to people outside the operation, but instead only minimal compensation was paid for sales to non-participants, and few products were ever sold to anyone other than participants. The scheme provided much larger rewards for recruiting people than for selling products, and more than 85 percent of the money consumers made was for recruitment. In addition to charging the defendants with operating an illegal pyramid scheme and making false earnings claims, the FTC charged them with furnishing consumers with false and misleading materials for recruiting more participants. The attorneys general offices of Illinois, Kentucky and North Carolina

joined the FTC complaint, as well as alleging violations of their respective state laws. The defendants are Paul C. Orberson, Thomas A. Mills, Fortune Hi-Tech Marketing Inc., FHTM Inc., Alan Clark Holdings LLC, FHTM Canada Inc., and Fortune Network Marketing (UK) Limited. On January 24, 2013, the court halted the deceptive practices, froze the defendants' assets, and appointed a temporary receiver over the corporations pending a trial. The Commission vote, including Commissioner J. Thomas Rosch, authorizing the staff to file the complaint was 5-0. The complaint was filed in the U.S. District Court for the Northern District of Illinois, Eastern Division." ([FTC](#), 1/28/13)

In 2013, Kentucky Attorney General Jack Conway Described FHTM As "One Of The Most Prolific Pyramid Schemes Operating In North America." "This is the beginning of the end for one of the most prolific pyramid schemes operating in North America," Kentucky Attorney General Jack Conway said. "This is a classic pyramid scheme in every sense of the word. The vast majority of people, more than 90 percent, who bought in to FHTM lost their money." ([FTC](#), 1/28/13)

In 2013, Then-Democratic NC Attorney General Roy Cooper Claimed Credit For Helping Take Down FHTM And Noted "Operations Like This Claim To Offer Career Success And High Earnings. But The Reality Is That Only The Few At The Top Make Money, And They Make It At The Expense Of New Recruits Who End Up Losing." "Fortune Hi-Tech Marketing, an alleged pyramid scheme in Kentucky that recruited more than 100,000 participants including consumers in North Carolina, has been shut down and its assets frozen, Attorney General Roy Cooper announced Monday. "Operations like this claim to offer career success and high earnings. But the reality is that only the few at the top make money, and they make it at the expense of new recruits who end up losing," said Cooper. Cooper partnered with the Federal Trade Commission and attorneys general in Kentucky and Illinois to ask a federal judge to shut down Fortune Hi-Tech Marketing (FHTM) last week. A court-appointed receiver now has possession of FHTM's assets and secured the company's headquarters and warehouse in Kentucky this morning. Cooper, the FTC, and the other attorneys general filed a lawsuit on Thursday, January 24 in federal court against FHTM and its principal operators, Paul Orberson, president, and Thomas Mills, vice president. U.S. District Court Judge John W. Darrah issued a temporary restraining order against the company, which required FHTM to immediately cease operations. The lawsuit seeks a permanent ban on FHTM's illegal operations, civil penalties, and refunds for consumers. As alleged in the complaint filed with the court, FHTM claimed participants could earn tens of thousands of dollars a year by buying into the operation to sell satellite television service, home security systems, beauty products and other consumer goods and services. Consumers paid \$249 to join FHTM. To qualify for sales commissions and recruiting bonuses, they had to pay an extra \$130 to \$400 and agree to be billed monthly for products unless they canceled the plan. Despite FHTM's claims, nearly every consumer who signed up lost more money than they ever made. Those who did make money did so by recruiting others to join the scheme, not by selling anything, Cooper, the FTC and the other attorneys general contend. FHTM's promotional presentations and materials focused almost entirely on recruiting new members rather than selling products, and FHTM distributors had no incentive to sell products. For example, FHTM distributors only received pennies for selling multi-year service contracts, but received substantial payments for each new FHTM member

they recruited. "This is a classic pyramid scheme in every sense of the word," Kentucky Attorney General Jack Conway said. "The vast majority, more than 90 percent, who bought in to FHTM lost their money." FHTM affected more than 100,000 consumers throughout the United States and in other countries." ([WBTU](#), 1/28/13)

- **“Cooper's Consumer Protection Division Received 37 Written Complaints And Inquiries About FHTM Starting In 2008, And Opened Its Investigation Into The Company In 2010.”** ([WBTU](#), 1/28/13)
- **NOTE: In March 2024, Bradley Has Posted Meeting With Cooper Noting “Gov Cooper Gave A Strategic Plan For NC At An Event In Charlotte And I Was Able To Meet Him In Person For The First Time.”** ([Instagram](#), 3/26/24)



([Instagram](#), 3/26/24)

In 2014, The FTC Banned FHTM For Being A Pyramid Scheme That “Enrolled More Than 350,000 Consumers Throughout The United States, Puerto Rico And Canada”; The Order Also “Requires The Operators To Surrender Assets Totaling At Least \$7.75 Million, Which Will Be Returned To Consumers.” “The operators of a Kentucky-based pyramid scheme, which enrolled more than 350,000 consumers throughout the United States, Puerto Rico and Canada in the last four years, have been banned from multi-level marketing under a settlement with the Federal Trade Commission and the states of Illinois, Kentucky and North Carolina. The settlement also requires the operators to surrender assets totaling at least \$7.75 million, which will be returned to consumers.” ([FTC](#), 5/13/14)

- **“In Recent Years, The Scheme Targeted Spanish-Speaking And Immigrant Communities. Participants Were Required To Pay Substantial Start-Up Costs And Monthly Fees To Retain Their Positions With The Company.”** “In recent years, the scheme targeted Spanish-speaking and immigrant communities. Participants were

required to pay substantial start-up costs and monthly fees to retain their positions with the company. The court subsequently halted the deceptive practices, froze the defendants' assets, and appointed a receiver over the corporations pending a trial." ([FTC](#), 5/13/14)

- **“After Conducting Its Own Investigation, The Court-Appointed Receiver Determined That FHTM’s Main Business Was Recruiting New Members And Not Selling Products And Services As It Claimed, And Confirmed The Allegations Made By The FTC And The States.”** ([FTC](#), 5/13/14)
- **“The Overwhelming Majority Of Participants – More Than 98 Percent – Lost More Money Than They Ever Made. At Least 88 Percent Of Consumers Did Not Even Recoup Their Enrollment Fees. To The Extent That Consumers Could Make Any Income, It Was Mainly For Recruiting Other Consumers Into FHTM’s Scheme.”**
“The overwhelming majority of participants – more than 98 percent – lost more money than they ever made. At least 88 percent of consumers did not even recoup their enrollment fees. To the extent that consumers could make any income, it was mainly for recruiting other consumers into FHTM’s scheme. More than 81 percent of the payments to participants were based on recruiting new members and not for the sale of products or services. Not surprisingly, at least 94 percent of consumers did not renew their membership after their initial year.” ([FTC](#), 5/13/14)
- **“In Addition To The Multi-Level Marketing Ban, The Settlement Order Permanently Prohibits Thomas A. Mills, Fortune Hi-Tech Marketing Inc., FHTM Inc., Alan Clark Holdings LLC, FHTM Canada Inc., And Fortune Network Marketing (UK) Limited From Misrepresenting Material Facts About Any Product Or Service, Including Claims Concerning How Much Money Consumers Can Earn.”** “In addition to the multi-level marketing ban, the settlement order permanently prohibits Thomas A. Mills, Fortune Hi-Tech Marketing Inc., FHTM Inc., Alan Clark Holdings LLC, FHTM Canada Inc., and Fortune Network Marketing (UK) Limited from misrepresenting material facts about any product or service, including claims concerning how much money consumers can earn. The order also bars the defendants from selling or otherwise benefitting from customers’ personal information, failing to properly dispose of customer information, and collecting any additional money from customers.”
- **“The Order Imposes A Judgment Of More Than \$169 Million, Which Will Be Partially Suspended When The Defendants Have Surrendered Certain Assets With An Estimated Value Of At Least \$7.75 Million, Including Assets Of The Deceased Defendant Paul C. Orberson’s Estate.”** “The order imposes a judgment of more than \$169 million, which will be partially suspended when the defendants have surrendered certain assets with an estimated value of at least \$7.75 million, including assets of the deceased defendant Paul C. Orberson’s estate. The full judgment will become due immediately if the defendants are found to have misrepresented their financial condition. The settlement resolves all of the FTC’s claims against the defendants, as well as the claims brought by Illinois, Kentucky and North Carolina. The Commission vote approving the proposed stipulated order was 4-0. The order was entered by the U.S. District Court for the Eastern District of Kentucky, Central Division at Lexington, on May 9, 2014.” ([FTC](#), 5/13/14)

In 2016, The FTC Mailed “285,361 Checks Totaling More Than \$3.7 Million To People Who Lost Money To Fortune Hi-Tech Marketing (FHTM), A Pyramid Scheme Whose Operators Were Banned From Multi-Level Marketing Under A Settlement With The FTC And The States Of Illinois, Kentucky And North Carolina.” “The Federal Trade Commission is mailing 285,361 checks totaling more than \$3.7 million to people who lost money to Fortune Hi-Tech Marketing (FHTM), a pyramid scheme whose operators were banned from multi-level marketing under a settlement with the FTC and the states of Illinois, Kentucky and North Carolina. Recipients should deposit or cash checks within 60 days. It is possible that the FTC will have additional funds to distribute in the future, after lawsuits filed against FHTM’s highest earning sales representatives have been resolved. The FTC never requires people to pay money or provide account information to cash refund checks. If you have questions about the case, contact the FTC’s refund administrator, Epiq Systems, Inc., at 800-964-0978. Learn more about the FTC’s refund program. The Federal Trade Commission works to promote competition, and protect and educate consumers. You can learn more about consumer topics and file a consumer complaint online or by calling 1-877-FTC-HELP (382-4357). Like the FTC on Facebook, follow us on Twitter, read our blogs and subscribe to press releases for the latest FTC news and resources.” ([FTC](#), 11/8/16)

Promotion Of MLM/ Pyramid Scheme – Ariix

VIDEO: In 2015, Bradley Posted A Video Promoting MLM Company Ariix. ([YouTube](#), 2/10/15)



([YouTube](#), 2/10/15)

- **VIDEO: In 2015, Bradley Posted A Video Promoting Ariix’s Slenderiiz Product.** ([YouTube](#), 2/10/15)



([YouTube](#), 2/10/15)

- **In 2014, UK Regulators Under The Advertising Standards Authority Criticized Slenderiiz For Making Unfounded Claims Regarding Its Efficacy And Prohibited The Company From Making Such Claims Moving Forward.** “The study provided by the advertisers looked at the effect of “Slenderiix Xceler8”, “Rejuveniix (energy)”, “Nutrifii (vitamins)” and “Resoriix (detox)” on individuals in conjunction with a diet which limited calorie intake to around 1250 calories per day. Twenty-three individuals, three men and 20 women, who were looking to lose weight, “were selected on the basis of commitment to completing the 12 week course”. Nineteen completed the programme. The study compared one group taking Slenderiix, Xceler8 and Nutrifii; one group taking Slenderiix, Xceler8, Nutrifii and Resoriix; one group taking Slenderiix, Xceler8, Nutrifii, Rejuveniix and Resoriix; and a “control group” which took Nutrifii and Resoriix. All groups also reduced their calorie intake to to 1250 calories during the study. The groups were also given detailed advice about food selection, daily calorie maximum intake and appropriate hydration in relation to their diet. The study provided the minimum and maximum starting weights and averages, but did not detail how the individuals within the groups were selected to ensure that the groups were comparable and sufficiently representative of any relevant variables to draw robust conclusions, nor did the study specify how many individuals were in each group. The ASA was concerned that each group might have unequal numbers of participants and/or an insufficient number of participants to draw robust conclusions. Individuals were also required to participate in an exercise programme. However, the study suggested that the participants could select their own exercise programme, if they wished, and were concerned that different exercise programmes, in the context of a weight loss study, could also affect the robustness of the conclusions drawn in relation to the effects of Slenderiix and Xceler8. In light of the possible limitations of the methodology used, we considered that the study was unlikely to be sufficiently robust to support any weight loss claims. Moreover, we noted that the

CAP Code required homeopathic medicinal products to be registered in the UK and to confine information given in marketing communications to that which appeared on the product label. We considered that the ad was promoting the homeopathic products Slenderiix & Xceler8, but understood, following consultation with the Medicines and Healthcare Products Regulatory Agency (MHRA), that Slenderiix and Xceler8 were not licensed as medicines in the UK. We considered that claims such as “Slenderiix ... alleviates hunger as it flushes fats and toxins from our systems”, “Slenderiix signals your hypothalamus to mobilize fat out of your body’s fat storage areas makes it available for you to burn as you go about your daily activities”, “Slenderiix and Xceler8 Drops begin to curb your hunger and release fat stores to help feed your body” and “Xceler8 helps ensure maximum effectiveness when used with Slenderiix Drops ... it optimizes absorption of everything you eat and drink, including the Slenderiix drops” were medicinal claims that the products achieved weight loss. Because those medicinal claims were being made in relation to unlicensed homeopathic products, we concluded that the claims breached the advertising Code. On that point, the claims breached CAP Code (Edition 12) rules 12.1 and 12.20 (Medicines, medical devices, health-related products and beauty products). Action The claims must not appear again in their current form. We told the advertisers not to make medicinal claims for Slenderiix and Xceler8.” ([UK Advertising Standards Authority](#), 6/11/14)

“Forever Living Is One Of A Number Of Multi-Level Marketing (MLM) Companies Facing Criticism From Some Women Who Feel They Have Been Exploited. Others Include Arbonne, Ariix, Even The Body Shop.” “Forever Living is one of a number of Multi-Level Marketing (MLM) companies facing criticism from some women who feel they have been exploited. Others include Arbonne, Ariix, even The Body Shop. The once High-Street favourite now also sells its beauty products via sales reps on social media — you may well have seen them on Facebook. They may even have become more frequent in recent weeks — since some MLM companies are reportedly using the pandemic to recruit sellers by offering flexible hours and work from home. Their targets are predominantly women, often with young families. The Direct Selling Association (DSA) estimates roughly 400,000 people in the UK are currently involved in direct selling in some way — around 76 per cent women.” ([Daily Mail](#), 7/15/20)

- **Ariix Has Been Described By At Least One Former Representative As “A Cult” In Which She Was Lured By Promises Of High Profits.** “Teacher Olivia Thompson, 38, was also left out of pocket when she spent £1,400 on wellness products from high-end US MLM Ariix, after being told buying in bulk would mean better profits. In six months, she clawed back only £700. ‘I have a First Class degree — I’m not stupid,’ says Olivia, a single parent from London. ‘But I was sold a dream and ended up feeling like a joke.’ Ariix, with its £110 night cream and £66 supplements, stood out as ‘classy,’ says Olivia, who spent £200 on a starter package in 2018. She too was told by her upline to flood social media with Ariix-related messages. ‘I said I’d cured my hangover with their vitamin drink, but I wasn’t telling the truth,’ she says. ‘It was like a cult.’ Ariix operates on a points system, under which reps have to earn 100 points a month — the equivalent of about £100 — to earn 15 per cent commission. ‘If I didn’t sell enough I got no commission,’ says Olivia. Over three months, she spent £1,200 on more products, maxing out her credit card. She told herself it was worth it to gain an increase to 25 per cent. ‘My upline said she couldn’t tell me to spend the money — but that if she were me

she would, and I would quickly make it back.’ Instead, Olivia alienated friends and family. ‘My sister said MLMs were “evil”. I felt judged by school friends — we still don’t speak.’ She felt increasingly despondent: ‘I was desperate and in tears.’ She recruited just one woman before quitting in December 2018. ‘I got into at least £700 of debt and would have been much better off getting another job,’ says Olivia. Ariix says average annual earnings for all its 43,945 global sellers are £1,616 — but for full-time workers, it is £228,655. They claim there is no obligation to buy a starter pack. A spokesperson says they ‘discourage “product loading” in an attempt to increase commission.’ ‘We are very conscientious in our training that product purchase is not a requirement,’ the company said, adding that it is ‘unable to control the actions of every single one of our reps’. It added, ‘We regret this individual did not receive the support and follow-up from her team member,’ but denied Ariix was comparable to a pyramid scheme, adding: ‘Network Marketing or “MLM” is based on the sale of high-quality products to consumers.’ Olivia, however, ended up throwing unsold Ariix products away.” ([Daily Mail](#), 7/15/20)

In 2023, “Ariix Has Been Fined €960,000 EUR For Consumer Fraud By Italy’s Competition Authority (AGCM).” “Ariix has been fined €960,000 EUR for consumer fraud by Italy’s Competition Authority (AGCM). Following a complaint filed by the consumer protection group “Il Gatto e la Volpe Nel Web” in 2018, Italian authorities began investigating Ariix and parent company NewAge. AGCM’s legal action commenced against Ariix Italy S.r.l. on May 24th, 2022. As part of their investigation, AGCM established that Ariix made 30 to 40 million euros in sales in Italy in 2021. Ariix was promoted in Italy through Unstoppable Generation, which AGCM initially tied to Unstoppable Generation S.r.l. Unstoppable Generation is run by Claudio Capozza. In 2020 BusinessForHome cited as Ariix’s “no. 1 next gen leader worldwide”. ([Behind MLM](#), 1/4/23)

- Italian Regulator “AGCM Concluded “Conditions For A Pyramid Sales System Existed”, And That “Ariix’s Sales System Has The Characteristics Of A Pyramid Scheme.”** “AGCM’s investigation found that, outside of Ariix, Unstoppable Generation generated 118,000 euros for Capozza in 2021. In investigating Ariix, AGCM examined whether: Ariix’s “sales system” was a pyramid scheme; promotion of Ariix’s products on social media by Unstoppable Generation failed to disclose the business and relationship the poster had to the business; and the products Slendeez Gocce Day&Night” and “Tahitian Noni” were sold without approval by the Ministry of Health The investigation saw AGCM visit Ariix’s and Unstoppable Generation’s registered offices in Italy. In June 2022 Ariix and Unstoppable Generation provided AGCM with additional requested information. AGCM’s investigation concluded on November 7th. Based on information provided, AGCM established that, for 2021, 50% to 55% of Ariix’s sales volume was distributor purchases. Upon further analysis, AGCM concluded; Ariix’s marketing materials focused “on expanding the number of (recruited) affiliates rather than sale of products”; “over half” of Ariix’s sales volume was generated via distributor purchases (as opposed to sales to retail customers); what retail sales volume existed within Ariix, was not enough to sustain the business; Ariix’s “economic sustainability” was “directly related to the number of (distributors)” it has; Based on these findings, AGCM concluded “conditions for a pyramid sales system existed”, and that “Ariix’s sales system has the characteristics of a pyramid scheme.” ([Behind MLM](#), 1/4/23)

Personal Scandals (Alleged)**Extramarital Affair And Marriage To Sexual Predator**

In 2011 And 2012, Bradley (Then Woodson Gardner) Was Alleged In Some Online Message Boards Of Being The Mistress Of Major FHTM Salesman Todd Rowland And Of Being “Married To A Convicted Child Molester And Registered Sexual Predator.”

([Complaints Board](#), 10/30/12)



Robshaw of Cheyenne, US

Oct 30, 2012 | 4:12 am EDT



He has no morals or ethics. Religion has no part in his life. Money is the only thing he cares about. He will screw anyone who can help him get to the top or on top. His income has deteriorated in the past 2 years to nothing. He has major IRS issues including audits for the past 5 years. His mistress **Woodson** Gardner is married to a convicted child molester and registered sexual predator. He will lie - cheat or steal as long as it makes him money.

Helpful?



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([Complaints Board](#), 10/30/12)



Unknown said...

FHTM is no longer authorized to use the DuPont name, logo, or trademark in any way. FHTM should immediately discontinue the use of any materials containing the DuPont logo. Our right to use DuPont's name, logo and trademark was revoked because FHTM abused the system by creating and distributing unapproved marketing materials that displayed the DuPont logo.

March 7, 2011 at 7:22 AM

Anonymous said...

Todd Rowland's mistress - **Wood**son Gardner is married to Platinum Sales Manager - Clay Hair - who is a convicted child molester and registered sexual predator.

Why did Todd move out of his rent-a-mansion in the middle of the night last month? He couldn't afford the 50K monthly payments. Is his life unraveling because his FHTM income has dropped like an asteroid from space?

([Work FHTM Blog](#), 3/7/11)