26SW002054

File No. 26CR020648-910

# SEARCH WARRANT

## STATE OF NORTH CAROLINA

WAKE County

In The General Court Of Justice
District/Superior Court Division

**IN THE MATTER OF**

The Athletic Foundation of the University of North Carolina at Charlotte
Hwy 49 North Box 12665
Charlotte, NC 28223

*Name Of Applicant*
Special Agent K. Kearney

*Name Of Additional Affiant(s)*

To any officer with authority and jurisdiction to conduct the search authorized by this Search Warrant:

I, the undersigned, find that there is probable cause to believe that the property and person described in the application on the reverse side and related to the commission of a crime is located as described in the application.

You are commanded to search the premises, vehicle, person and other place or item described in the application for the property and person in question. If the property and/or person are found, make the seizure and keep the property subject to Court Order and process the person according to law.

You are directed to execute this Search Warrant within forty-eight (48) hours from the time indicated on this Warrant and make due return to the Clerk of the Issuing Court.

This Search Warrant is issued upon information furnished under oath or affirmation by the person(s) shown.

| *Date Issued* | *Time Issued* | *Name (type or print)* | *Signature* |
|---|---|---|---|
| 10-2-26 | 2:46 ☐AM ☒PM | Bryan Collins | Bryan Collins |

☐ *Deputy CSC* ☐ *Assistant CSC* ☐ *CSC* ☐ *Magistrate* ☐ *District Ct. Judge* ☒ *Superior Ct. Judge*

**NOTE:** *When issuing a search warrant, the issuing official must retain a copy of the warrant and warrant application and must promptly file them with the clerk. G.S. 15A-245(b).*

## RETURN OF SERVICE

I certify that this Search Warrant was received and executed as follows:

| *Date Received* | *Time Received* | *Date Executed* | *Time Received* |
|---|---|---|---|
| 10/2/2026 | 2:51 ☐AM ☒PM | 10/2/2026 | 3:06 ☐AM ☒PM |

☒ I made a search of The Athletic Foundation of the University of North Carolina at Charlotte as commanded.

☒ I seized the items listed on the attached inventory.

☐ I did not seize any items.

☐ This Warrant WAS NOT executed within forty-eight (48) hours of the date and time of issuance and I hereby return it not executed.

This Search Warrant was delivered to me on the date and at the time shown below when the Office of the Clerk of Superior Court is closed for the transaction of business. By signing below, I certify that I will deliver this Search Warrant to the Office of the Clerk of Superior Court as soon as possible on the Clerk's next business day.

| *Name Of Officer Making Return (type or print)* | *Date* | *Time* | *Name Of Magistrate (type or print)* | *Signature Of Magistrate* |
|---|---|---|---|---|
| K. Kearney | | ☐AM ☐PM | | |

*Signature Of Officer Making Return*
K. Kearney

This Search Warrant was returned to the undersigned clerk on the date and time shown below.

| *Department Or Agency Of Officer* | *Incident Number* | *Date* | *Time* | *Name Of Clerk (type or print)* | *Signature Of Clerk* | ☐~~Dep.~~ CSC ☐Asst. CSC ☐CSC |
|---|---|---|---|---|---|---|
| NCSBI | 2025-030691 | 10/16/26 | 1:23 ☐AM ☑PM | M. Myles C. | M. Myles C. | |

**Original** - File **Copy** - For Search of a Person, to Person from Whom Items Taken
**Copy** - For Search of Vehicle/Premises, to Owner or Person in Apparent Control; if No Such Person Present, Leave Copy Affixed Thereon

(Over)

AOC-CR-119, Rev. 6/19
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# APPLICATION FOR SEARCH WARRANT

I, Special Agent K. Kearney of the North Carolina State Bureau of Investigation,
*(Insert name and address; or if law enforcement officer, name, rank and agency)*

being duly sworn, request that the Court issue a warrant to search the person, place, vehicle, and other items described in this application and to find and seize the property and person described in this application. There is probable cause to believe that *(Describe property to be seized; or if search warrant is to be used for searching a place to serve an arrest warrant or other process, name person to be arrested)*

SEE ATTACHED "PROPERTY/EVIDENCE TO BE SEIZED"

constitutes evidence of a crime and the identity of a person participating in a crime, *(Name crime)* Obtaining Property by False Pretense, NCGS 14-100.

and is located *(Check appropriate box(es) and fill in specified information)*

☒ in the following premises *(Give address and, if useful, describe premises)*
SEE ATTACHED "PLACES TO BE SEARCHED"

*(and)*

☒ on the following person(s) *(Give name(s) and, if useful, describe person(s))*
SEE ATTACHED "PLACES TO BE SEARCHED"

*(and)*

☒ *(Name and/or describe other places or items to be searched, if applicable)*
SEE ATTACHED "PLACES TO BE SEARCHED".

The applicant swears or affirms to the following facts to establish probable cause for the issuance of a search warrant:

SEE ATTACHED "PROBABLE CAUSE AFFIDAVIT".

| SWORN/AFFIRMED AND SUBSCRIBED TO BEFORE ME | Date: 10/2/2026 |
|---|---|
| Date: 10-2-26 | Name Of Applicant (type or print): SA K. Kearney |
| Signature: Bryan Collins | Signature Of Applicant: |
| ☐ Magistrate ☐ Dep. CSC ☐ Asst. CSC ☐ Clerk Of Superior Court ☒ Judge | |

☒ In addition to the affidavit included above, this application is supported by additional affidavits, attached, made by Special Agent K. Kearney, NCSBI.

☐ In addition to the affidavit included above, this application is supported by sworn testimony, given by _____.

This testimony has been *(check appropriate box)* ☐ reduced to writing ☐ recorded, and I have filed any such writing/recording with the clerk.

☒ in the following vehicle(s) *(Describe vehicle(s))*

SEE ATTACHED "PLACES TO BE SEARCHED"

AOC-CR-119, Side Two, Rev. 6/19

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**NOTE:** *If more space is needed for any section, continue the statement on an attached sheet of paper with a notation saying "see attachment." Date the continuation and include on it the signatures of applicant and issuing official.*

The Athletic Foundation of the University of North Carolina at Charlotte
Hwy 49 North Box 12665
Charlotte, NC 28223

ATTACHMENT I- PROPERTY/EVIDENCE TO BE SEIZED:

Any and all records related to the following transactions associated with David H. Coble:

| Account Number | Card Number | Date | Business Name | Description | Debit Amount |
|---|---|---|---|---|---|
| [redacted] | [redacted] | 9/10/23 | UNC Charlotte ATH 49ERTIC | UNC CHAR ATH 49ERTIC INT 0000 CHARLOTTE NC 704-687-4949 | $3,212 |

Including, but not limited to, the following related to above referenced transactions:

1. Customer Identity, including name, address, and any other identifying information.
2. Identifying information for any person listed as a "guest" associated with these transactions
3. Method of payment and transaction details.
4. Date and Time Purchased.
5. Records of admission ticket transfers and confirmed redemption of tickets purchased
6. Any special events scheduled during the dates of the transactions and if the guest(s) were associated with the event(s).
7. Any and all items or services purchased associated with the above transactions.
8. Any bank or financial records of the transaction.
9. Any other records held by the Athletic Foundation of the University of North Carolina at Charlotte associated with the above transactions.

ATTACHMENT II- PLACES TO BE SEARCHED:

The Athletic Foundation of the University of North Carolina at Charlotte
Hwy 49 North Box 12665
Charlotte, NC 28223

ATTACHMENT III- PROBABLE CAUSE AFFIDAVIT:

The Affiant swears to the following facts to establish probable cause for the issuance of a search warrant:

I, the undersigned Special Agent (SA) K.S. Kearney, am a sworn law enforcement officer with over seven years of experience. Throughout my career, I have served in various roles including a Probation/Parole Officer with the North Carolina Department of Community Corrections and a Special Agent with the North Carolina State Bureau of Investigation (NCSBI). I currently serve as a Special Agent in the NCSBI's Professional Standards Unit, where I am responsible for conducting criminal investigations involving violations of both federal and North Carolina state law. My professional development includes more than 350 hours of specialized training in areas such as crime scene processing, interview and interrogation, homicide investigations, cellular phone exploitation, financial crimes investigations, and internal affairs. I am a graduate of the Basic Law Enforcement Training Program at Vance-Granville Community College and the NCSBI Special Agent Academy. I also hold a bachelor's degree from North Carolina Central University. Additionally, I have completed course work through the North Carolina Justice Academy.

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 2nd DAY OF October, 2026.

Signature of Applicant

Bryan Collins
☐ Deputy CSC ☑ Asst. CSC ☐ Clerk of Sup. Ct. ☐ Mag. ☒ Judge

IN THE MATTER OF:

ATTACHMENT TO APPLICATION
FOR SEARCH WARRANT

The Athletic Foundation of the University of North Carolina at Charlotte
Hwy 49 North Box 12665
Charlotte, NC 28223

The information received during the course of this investigation included in this affidavit is believed to be true and accurate by SA K. Kearney.

In August of 2024, the North Carolina State Ethics Commission (Ethics Commission), the North Carolina Secretary of State's Office, the Wake County District Attorney's Office and several other entities received copies of a complaint alleging violations of the lobbying and ethics laws of the State as well as other statutory provisions pertaining to charitable organizations by the non-profit 501(c)(4) Greater Carolina, Inc. The Ethics Commission initiated an inquiry into these allegations.

The results of the Ethics Commission's inquiry were presented to the Wake County District Attorney who, based on the information presented, requested the North Carolina State Bureau of Investigation to initiate a criminal investigation regarding allegations that people associated with Greater Carolina engaged in conduct which may constitute a crime. A part of the investigation involved an analysis of financial records related to deposit and credit accounts identified as used by members of the Greater Carolina Organization.

In 2018, Clark Riemer incorporated Greater Carolina as a not-for-profit corporation organized pursuant to Section 501(c)(4) of the Internal Revenue Code of 1986. Former North Carolina representative Jason Saine was involved in the conception of the idea to create Greater Carolina. As a 501(c)(4) organization, Greater Carolina raised money to spend on issue advocacy and in supporting various candidates. From 2018 to 2024, the amount of money raised annually by Greater Carolina, Inc. grew substantially from approximately $60,000 its first year to more than $800,000 in 2023 and more than $500,000 in 2024 according to the Internal Revenue Service Form 990 "Return of Organization: Exempt from Income Tax" filings submitted by Greater Carolina, Inc. Greater Carolina described itself as a 50 I ( c )( 4) coalition of forward thinking, pro-free market conservative leaders from across North Carolina dedicated to ensuring a strong economic future for ALL of North Carolina.

On February 15, 2026, SA K. Kearney applied for a search warrant which was issued by Superior Court Judge S. A. B. Cole. The search warrant directed Fidelity Bank to disclose the financial records related to the deposit accounts of Greater Carolina. A review of those records led SA Kearney to apply for a search warrant directing American Express to disclose financial records associated with the credit account for Greater Carolina. That search warrant was issued by Superior Court Judge P. Ridgeway on March 26, 2026.

According to organizational documents filed with the North Carolina Secretary of State's Office on August 21, 2018, Greater Carolina, Inc., is organized as a social welfare organization under Section 501(c)(4) of the Internal Revenue Code of 1986 with the purpose of engaging in public policy advocacy and any other lawful act. The Articles of Incorporation expressly provided that "no part of the net earnings of the Corporation shall inure to the benefit of, or be distributable to any director or officer…or any other private person."

SA Kearney interviewed Anna Scott Marsha Barefoot and Sarah Newby who indicated they were contracted with by the board of Greater Carolina to organize events, raise funds, and solicit donors for the benefit of the organization. From 2021 to 2022, Barefoot was responsible for organizing several events for Greater Carolina, managing donors and sponsors of the organization, and assisting with creating donor membership levels, to include the cost, and the benefits of each level. From 2023 to 2024, Newby was responsible for planning and coordinating events, soliciting donors and sponsors, and completing tasks

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THIS 2nd DAY OF October, 2026.

Signature of Applicant

Bryan Collins

☐ Deputy CSC ☐ Asst. CSC ☐ Clerk of Sup. Ct. ☐ Mag. ☒ Judge

The Athletic Foundation of the University of North Carolina at Charlotte
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Charlotte, NC 28223

assigned to her specifically by the board members of Greater Carolina. Both indicated either David Coble and/or Madeline Keeter were their point of contact for funding fundraising efforts and were authorized users of an American Express credit card.

On April 13, 2026, SA Kearney interviewed Richard Earl Bengel IV, board member of Greater Carolina, who explained Greater Carolina was in support of pro-entrepreneurial conservative causes and a proponent for better policies for business. Bengel understood that a 501(c)(4) non-profit organization had to have an educational component. The focus of the education for Greater Carolina, during Bengel's tenure, was educating lobbyists, legislators, and the public on sport betting. Greater Carolina's process to educate included the initial research on the topic, create a study and presentations. The organization's efforts were funded through fundraising events like symposiums. At the fundraising events the organization invited experts on the topic to talk to attendees who paid admission to Greater Carolina. Also, a company could sponsor the fundraising event and receive some sort of exposure like logo on a backdrop or their mention on the invitation. The organization may have also raised funds through donations, including the donation link on the Greater Carolina website.

On Monday, May 26, 2026, Assistant Special Agent in Charge (ASAC) W. D. Marsh conducted online research regarding the website for Greater Carolina, INC. The known website for Greater Carolina was greatercarolina.com.

ASAC Marsh conducted the following research regarding this website:

- Directly accessing this website indicated the website was no longer active and did not provide pages related to Greater Carolina.
- A search for the website greatercarolina.com on the Internet Archive website archive.org indicated the active website was last archived on October 13, 2025.
- The archived website included the main page and four links at the top right of the main page which were titled "Our Mission," "Policy," "Contact Us," and "Donate."
- The first three links had been archived and were accessible through the archived page. The Donate link had not been archived; however, the link URL was available.

On the archived website for the "Our Mission" page, Greater Carolina published their mission as, "To ensure North Carolina embraces the policies necessary to maintain and support our status as one of the best states in the nation for business and free enterprise. For the future economic success and vitality of our state, it is crucial that our tax and regulatory systems keep pace with entrepreneurship and new technology by promoting economic growth and innovation."

On the archived website for the "Policy" page, Greater Carolina published, "Greater Carolina Supports Policies that…Ensure economic vitality by maintaining a pro-growth tax structure that allows North Carolina taxpayers to keep more of what they earn. Support risk-taking and entrepreneurship by lowering unnecessary regulatory hurdles. Use responsible economic development tools to bring new businesses and jobs to North Carolina. Encourage a strong workforce by embracing innovative student centered education policies."

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 2nd DAY OF October, 2026.

Signature of Applicant

Bryan Collins
☐ Deputy CSC ☑ Asst. CSC ☐ Clerk of Sup. Ct. ☐ Mag. ☒ Judge

The Athletic Foundation of the University of North Carolina at Charlotte
Hwy 49 North Box 12665
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The records from American Express, regarding the credit account from Greater Carolina, were received on May 5, 2026. SA Kearney reviewed these records and noted the following information:

- The application for this credit account was made by David H Coble on August 2, 2022. Coble listed his employment as the Treasurer for Greater Carolina Inc.
- The business type was indicated as "Service."
- The application listed the tax identification number as [redacted] which was the federal tax identification number for Greater Carolina Inc.
- The additional card member information listed Madeline Keeter, who had been identified as the Executive Director of Greater Carolina Inc.
- American Express issued individual credit card numbers to David Coble and Madeline Keeter. At some point during the life of the account, David Coble and Madeline Keeter were issued new credit card numbers under their name for this account.

During the review of the American Express statements and purchase records the following financial transactions reportedly made to The Athletic Foundation of the University of North Carolina at Charlotte using the American Express credit cards assigned to David Coble were found:

| Account Number | Card Number | Date | Business Name | Description | Debit Amount |
|---|---|---|---|---|---|
| [redacted] | [redacted] | 9/10/23 | UNC Charlotte ATH 49ERTIC | UNC CHAR ATH 49ERTIC INT 0000 CHARLOTTE NC 704-687-4949 | $3,212 |

The Charlotte 49ers Athletic Foundation is a fundraising and philanthropic organization that supports UNC Charlotte's athletic programs and student-athletes. Their main functions included help fund scholarships for Charlotte 49ers student-athletes, funding athletic expenses including nutrition, sports medicine, academic services, recruiting, travel, and student-athlete development, facilitating major gifts that support facility improvements, endowments, and specific athletic programs, operating the 49er Club which is the Foundation's official booster organization, and donor benefits.

Additional transaction records identified during the analysis of the American Express records included:

On November 13, 2023, a charge of $12,027.00 and on July 9, 2024, a charge of $14,427.00 was made to the Carolina Panthers. The Carolina Panthers are a professional American football team based in Charlotte, North Carolina. The team is a part of the National Football League as a member of the NFC South. The purchase was made using the American Express credit card assigned to David Coble.

On August 8, 2024, a charge of $ $11,868.80 was made to the Gulf Coast Holdings, Clearwater, Florida. Gulf Coast Holdings is a business that focuses on real estate development, property holding, and

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 2nd DAY OF October, 20 26.

Signature of Applicant

Bryan Collins
☐ Deputy CSC ☒ Asst. CSC ☐ Clerk of Sup. Ct. ☐ Mag. ☒ Judge

The Athletic Foundation of the University of North Carolina at Charlotte
Hwy 49 North Box 12665
Charlotte, NC 28223

investment, and owns OZ Gentlemen's club, an adult entertainment club located in Clearwater, Florida. The purchase was made using the American Express credit card assigned to David Coble.

On November 14, 2025, a financial transaction of $4079.00 was made to Carolina Men's Clinic located in Mooresville, North Carolina. The purchase was made using the American Express credit card assigned to David Coble. The Carolina Men's Clinic is a medical facility which according to its website specializes in treating erectile disfunction and other sexual related medical issues for men. Other services advertised by the Carolina Men's Clinic include Testosterone Treatment, Male Enhancement, and Hair Loss.

As described in the Internal Revenue Code (IRC) section a 501(c)(4) organization must not be organized for profit and must be operated exclusively to promote social welfare. The earnings of a section 501(c)(4) organization may not inure to the benefit of any private shareholder or individual. To operate exclusively to promote social welfare, an organization must operate primarily to further the common good and general welfare of the people of the community.

Based on the information in this affidavit, your affiant believes there is probable cause to believe that information contained in the records held by The Athletic Foundation of the University of North Carolina at Charlotte as described in the sections "Places to be searched" and "Items to be Seized" may be evidence of conduct and activities constituting the crime of Obtaining Property by False Pretense by individuals associated with Greater Carolina, Inc.

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 2nd DAY OF October, 20 26.

Bryan Collins
☐ Deputy CSC ☐ Asst. CSC ☐ Clerk of Sup. Ct. ☐ Mag. ☒ Judge

Signature of Applicant

**STATE OF NORTH CAROLINA**

File No. 26CR028048-910

Wake County

In The General Court Of Justice
☐ District ☒ Superior Court Division

**IN THE MATTER OF:**

*Name*
The Athletic Foundation of the University of North Carolina at Charlotte

## INVENTORY OF ITEMS SEIZED PURSUANT TO SEARCH

G.S. 15A-223, -254, -257

I, the undersigned officer, executed a search of:

| *Person, Premises Or Vehicle Searched* | *Date Of Search* |
|---|---|
| The Athletic Foundation of the University of North Carolina at Charlotte Hwy 49 North Box 12665, Charlotte, NC 28223 | 10/02/2026 |

This search was made pursuant to

☒ 1. a search warrant issued by: Honorable Judge G. Collins.

☐ 2. consent to search given by: _____.

☐ 3. other legal justification for the search: _____.

The following items were seized:
Digital records

**Original** - File
**Copy** - For Search by Warrant of a Person, to Person from Whom Items Taken
**Copy** - For Search by Warrant of Vehicle/Premises, to Owner or Person in Apparent Control; if No Such Person Present, Leave Copy Affixed Thereon
**Copies** - For Search by Consent, to Person Giving Consent and Owner of Vehicle/Premises Searched, if Known


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Items Seized Continued:

☒ 1. I left a copy of this inventory with the person named below, who is:

- ☐ a. the owner of the premises searched.
- ☐ b. the owner of the vehicle searched.
- ☒ c. the person in apparent control of the premises searched.
- ☐ d. the person in apparent control of the vehicle searched.
- ☐ e. the person from whom the items were taken.

☐ 2. As no person was present, I left a copy of this inventory:

- ☐ a. in the premises searched, identified on the reverse.
- ☐ b. in the vehicle searched, identified on the reverse.

*Name And Address Of Person To Whom A Copy Of This Inventory Was Delivered, If Any*

The law enforcement agency identified below will hold the seized property subject to court order.

**SWORN/AFFIRMED AND SUBSCRIBED TO BEFORE ME**

*Name Of Law Enforcement Officer (type or print)*
K. Kearney

*Date*
10/16/20

*Name (type or print)*

*Signature Of Law Enforcement Officer*

☐ *Notary*

*Signature*

*Title Of Law Enforcement Officer*
Special Agent

**SEAL**

*Date My Commission Expires*

*County Where Notarized*

*Name And Address Of Agency*
North Carolina State Bureau of Investigation
3320 Garner Road, Raleigh, North Carolina, 27610
919-662-4500

☑ *Deputy CSC* ☐ *Assistant CSC* ☐ *Clerk Of Superior Court* ☐ *Magistrate*

**ACKNOWLEDGMENT OF RECEIPT**

I, the undersigned, received a copy of this inventory.

*Date*

*Signature Of Person Receiving Inventory*


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