

STATE OF NORTH CAROLINA

WAKE COUNTY

BEFORE THE STATE BOARD OF ELECTIONS

In re Protests of JEFFERSON
GRIFFIN, ASHLEE ADAMS, FRANK
SOSSAMON, and STACIE MCGINN,

**Motion to Disqualify
Siobhan Millen**

Pursuant to N.C. Const. art. I, § 19 (the Law of the Land clause) and N.C. Gen. Stat. § 138A-36(a) and (c) (the North Carolina State Government Ethics Act), Judge Jefferson Griffin hereby respectfully moves for the removal of North Carolina State Board of Elections (“NCSBE”) Member Siobhan Millen from participating in any matters before the NCSBE concerning the November 5, 2024 election for Associate Justice of the North Carolina Supreme Court. This request for Ms. Millen’s removal applies to all election protests involving Judge Griffin and Justice Riggs over which the NCSBE has taken or takes jurisdiction in the first instance and any protests concerning these parties that are appealed to the NCSBE.

INTRODUCTION

Womble Bond Dickinson (“Womble”) represents Justice Riggs—and it has done so both before and after Election Day. Pressley Millen is a partner at Womble, and, leading up to Election Day, he held himself out as Justice Riggs’ lead attorney. For Judge Griffin’s election protests, however, Mr. Millen has declined to make an appearance and, instead, he has let his two partners—Samuel Hartzell and Ray Bennett—be the face of Justice Riggs’s legal team to this Board.

The disappearance of Mr. Millen from Womble’s public-facing legal team is insufficient to avoid Siobhan Millen’s disqualification from participating in matters involving her husband’s current client, Justice Riggs.

A reasonable observer would question the objectivity of Ms. Millen, who is the wife of the long-standing leader of Justice Rigg’s legal team. A reasonable observer would also conclude that Ms. Millen stands to benefit financially from this litigation through Mr. Millen’s ownership of a partnership share at Womble. Mr. Millen’s representation of Justice Riggs—and the Millen family’s financial connection to the Riggs matter before the NSCBE—requires the disqualification of Ms. Millen from considering the election protests concerning Judge Griffin and Justice Riggs.

ARGUMENT

I. Judge Griffin has a right to an impartial election tribunal.

Both the North Carolina Constitution and the State Government Ethics Act require Ms. Millen to remove herself from considering the Griffin-Riggs dispute.

Article I, Section 19 of the North Carolina Constitution guarantees that “[n]o person shall be taken, imprisoned, or disseized of his freehold, liberties, or privileges, or outlawed, or exiled, or in any manner deprived of his life, liberty, or property, but by the law of the land.” N.C. Const. art. I, § 19. The expression “the law of the land” as used in Article I, Section 19 of the North Carolina Constitution, is synonymous with the concept of “due process of law.” *State v. Ballance*, 229 N.C. 764, 769, 51 S.E.2d 731, 734 (1949).

“A fair trial in a fair tribunal is a basic requirement of due process.” *In re Murchison*, 349 U.S. 133, 136 (1955). And a fair hearing that comports with due process necessitates “an unbiased, impartial decision-maker.” *Crump v. Bd. of Education*, 326 N.C. 603, 615, 392 S.E.2d 579, 585 (1990). Therefore, under the North Carolina Constitution, Judge Griffin is entitled to a fair proceeding before unbiased decision-makers.

Judge Griffin’s constitutional right to a fair hearing before an unbiased decision-maker have been codified in North Carolina’s General Statutes. Specifically, the State Government Ethics Act provides that a “public servant shall take appropriate steps, under the particular circumstances and considering the type of proceeding involved, to remove . . . herself to the extent necessary, to protect the public interest and comply with this Chapter from any proceeding in which the public servant’s impartiality might reasonably be questioned due to the public servant’s familial, personal, or financial relationship with a participant in the proceeding.” N.C. Gen. Stat. § 138A-36(c).

Relevant here, a “participant” includes a “owner, . . . *partner*, . . . employee [or] agent of a business, organization, or group involved in the proceeding.” *Id.* (emphasis added). Under this definition, Womble and its partner, Mr. Millen, are each “participants” in the State Board proceeding. N.C. Gen. Stat. § 138A-36(c)(i). The fact that Mr. Millen is no longer publicly appearing as part of Womble’s legal team in this matter is legally irrelevant. He and Womble are both covered “participants” in this proceeding as a matter of law.

Additionally, Ms. Millen is a “public servant” within the meaning of the Act. N.C. Gen. Stat. § 138A-3(70)(i).¹ Ms. Millen therefore has an unacceptable conflict of interest based on her “familial, personal, or financial relationship with a participant in the proceeding” before the State Board. The State Government Ethics Act was enacted to prevent the potential of impartial decisions by public servants from infecting the public’s perception of the administration of State government. Ms. Millen has a statutory duty to recuse herself from these proceedings. *See* N.C. Gen. Stat. § 138A-36(c).

II. Ms. Millen’s impartiality will be questioned due to her husband’s leadership of the Womble practice group defending Justice Riggs.

Ms. Millen is married to the *de facto* leader of Justice Riggs’ legal team: Mr. Millen.

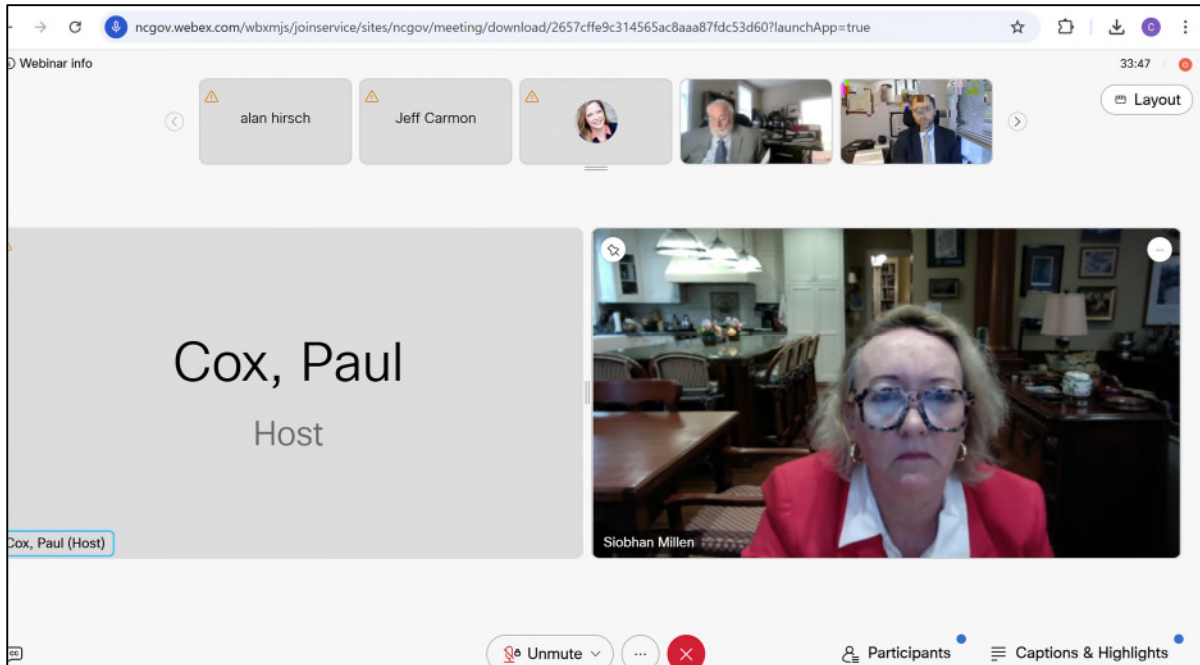
Womble attorneys Ray Bennett and Sam Hartzell are frequent collaborators with Mr. Millen, with Mr. Millen acting as the senior attorney of the group. Mr. Bennett and Mr. Millen have been co-counsel in approximately 37 decisions reported on Westlaw; and Mr. Hartzell and Mr. Millen are co-counsel in approximately 47 reported matters. As recently as last year, Mr. Millen led this trio of lawyers in a federal lawsuit filed on behalf of another sitting member of the North Carolina Supreme Court, Associate Justice Anita Earls, that was voluntarily dismissed after the federal courts refused to grant the relief requested. *See Earls v. N.C. Judicial*

¹ *See* N.C. State Ethics Commission, List of Covered Boards (identifying NCSBE is a board covered by State Government Ethics Act), *available at* <https://ethicssei.nc.gov/Tools/CoveredBoards?type=7>.

Standards Comm'n, et al., Case No. 1:23-CV-734 (M.D.N.C.). Thus, it is no surprise that this Womble team would represent Justice Riggs in the present proceedings.

Mr. Millen's role as lead counsel for Justice Riggs was evident in the days leading up to Election Day. On October 16, 2024, Mr. Millen sent a cease-and-desist letter on behalf of Justice Riggs to the Griffin campaign, accusing it of disseminating allegedly false information about her candidacy, specifically regarding claims of an investigation by the Judicial Standards Commission. See **Exhibit 1**. As the letter shows, Mr. Millen counts Justice Riggs as a current client who he is actively representing. He wrote to the Jefferson Griffin campaign, "I am counsel to Associate Justice Allison Riggs of the North Carolina Supreme Court." *Id.* at 1.

Although Womble may try to argue that Mr. Millen is no longer the partner handling Ms. Riggs's representation, Mr. Millen has likely already gained comprehensive knowledge about Ms. Riggs's campaign, about disputes with Mr. Griffin's campaign, and likely other sensitive information about matters at issue in these proceedings. A reasonable observer would perceive an intolerable risk that Mr. Millen has or may have shared such information with his wife. Indeed, Ms. Millen has already participated in a State Board hearing on this matter from the home that she shares with Mr. Millen. Below is an image taken from the Board's November 20, 2024 hearing in which the Board decided to take jurisdiction over three of the protests filed by Judge Griffin.



The public cannot avoid questioning the objectivity of Ms. Millen when she openly sits in the living room of the *de facto* leader of Justice Riggs’s legal team while she determines the fate of Justice Riggs’s election. This inescapable conflict of interest undermines public confidence in the impartiality of these proceedings. As such, Ms. Millen must remove herself to ensure compliance with the State Government Ethics Act, the principles of impartial governance, and the due process of law.

III. Ms. Millen likely stands to benefit financially from Womble’s litigation on behalf of Justice Riggs.

The problem is not only with Ms. Millen’s intimate relationship with Mr. Millen, but also her own financial interests. The Millen family stands to benefit financially from the election-protest proceedings currently before the Board.

Mr. Millen owns a partnership share at Womble, which Ms. Millen disclosed and reaffirmed on her 2023 and 2024 Statements of Economic Interest (“SEI”). *See*

Exhibit 2. An excerpt from Ms. Millen’s 2023 SEI, which includes her sworn admission of her husband’s possession of a partnership share in Womble, is below:

6. List each source of income (**not specific amounts**) of more than \$5,000 received by you or any members of your immediate family during 2022. 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 *and/or* 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** 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 Source	Type of Business/ Industry	Type of Income
<input type="checkbox"/> I had no reportable income over \$5,000 in 2022.			
<i>Presley Mr. Millen</i>	<i>Womble Bond Dickinson (us) LLP</i>	<i>law firm</i>	<i>partnership share</i>

Through Mr. Millen’s partnership shares and rights to a portion of the profits at Womble, Ms. Millen will benefit financially from this election litigation, which stands to generate substantial legal fees for the law firm.

But even if Ms. Millen did not have a direct financial interest in this ongoing litigation through her husband’s partnership rights, she nevertheless has an indirect interest in the success of the election dispute over which she presides. If Justice Riggs prevails against the pending election protests, the Womble practice group (of which Mr. Millen is the lead partner) stands to be able to tout its success to potential future candidates. More political clients begets more income for the Millens. Conversely, a loss in this election litigation could impede Mr. Millen’s practice group’s ability to retain current political clients and solicit new ones. In sum, Ms. Millen’s financial interests are tethered to the success of Mr. Millen’s practice group in the proceedings currently pending before Ms. Millen.

Thus, a neutral observer would reasonably doubt the outcome of the protest proceedings, if Justice Riggs prevails, wondering whether Ms. Millen exercised her official power and influence in a way that helped Womble—a law firm in which Ms. Millen’s husband owns a partnership share—achieve success. The very fact that the question can be asked illustrates that Ms. Millen is conflicted.

IV. Ethical canons require judges to recuse themselves when a party before the judge is represented by a spouse’s law firm.

The conclusion that Ms. Millen must recuse herself from these proceedings is well settled by ethical canons governing tribunals. Any other judge finding herself in Ms. Millen’s situation would be compelled by such ethical rules to recuse herself. Ms. Millen is no exception.

Judicial ethics require a judge to recuse herself if her spouse has an “interest that could be substantially affected by the outcome of the proceeding.” Canon 3(C)-(D)(iii), N.C. Canon of Judicial Ethics.² The Judicial Conference’s Committee on Codes of Conduct is more blunt on this point: A judge must recuse whenever the judge’s spouse “is an equity partner in a law firm that represents a party.” *Guide to Judiciary Policy*, Vol. 2B, Ch. 2, § 220, Ethics Advisory Opinion No. 58 (Disqualification When Relative is Employed by a Participating Law Firm), available at <https://www.uscourts.gov/sites/default/files/guide-vol02b-ch02.pdf>. The Committee further stated that “an equity partner in a law firm generally has ’an interest that

² Election protests are a quasi-judicial proceeding, so consultation of judicial ethics standards as authority is appropriate.

could be substantially affected by the outcome of the proceeding’ in all cases where the law firm represents a party before the court.” *Id.*

Here, Ms. Millen’s Statements of Economic Interest establish that her husband, Mr. Millen, is an “equity partner in a law firm [Womble] that represents a party.” Recusal of Ms. Millen is required regardless of whether Mr. Millen claims that he is no longer actively participating in the representation of Justice Riggs. His partnership share in Womble is sufficient to trigger Ms. Millen’s recusal. *Guide to Judiciary Policy*, Vol. 2B, Ch. 2, § 220, Ethics Advisory Opinion No. 58: *Disqualification When Relative is Employed by a Participating Law Firm.*

In addition, Judicial Standards Commission’s Formal Advisory Opinion 2015-03 states that a judge should recuse herself if a family member “contributed to the preparation of the matter before the judge.” If Mr. Millen assisted in this election dispute in any way, Ms. Millen should recuse herself. This ethical requirement for judges mirrors the ethical obligations of attorneys appearing before them: attorneys are to avoid working on cases over which a spouse will preside. *See* N.C. State Bar, 2005 FEO 1 (Oct. 21, 2005) (Inquiry No. 2).

In sum, in the mind of a detached observer, Ms. Millen’s impartiality might reasonably be questioned as to any election-related dispute concerning the Riggs-Griffin race. Ms. Millen is in an untenable position where her decisions cannot help but appear to be influenced by her husband’s professional and financial interests. Judges are required to recuse themselves in such situations to maintain public trust in the integrity of their decisions. Ms. Millen must do likewise.

CONCLUSION

Judge Griffin respectfully requests the disqualification of Siobhan Millen from participating in the Griffin-Riggs election protest proceedings before the North Carolina State Board of Elections pursuant to the North Carolina Constitution and the State Government Ethics Act, and for such other and further relief as the Board deems appropriate.

This the 26th day of November, 2024.

/s/ Craig D. Schauer

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Counsel for Jefferson Griffin

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was electronically filed and served this day by email, on the following parties:

Ray Bennett (ray.bennett@wbd-us.com)

Sam Hartzell (sam.hartzell@wbd-us.com)

John Wallace (jrwallace@wallacenordan.com)

Counsel for Allison Riggs

This the 26th day of November, 2024.

/s/ Craig D. Schauer

Craig D. Schauer

Exhibit 1



October 16, 2024

By Email

The Jefferson Griffin Committee
P.O. Box 99780
Raleigh, NC 27624
c/o Mr. Collin McMichael, Treasurer

*Re: False Statements Concerning North Carolina
Justice Allison Riggs*

Womble Bond Dickinson (US) LLP

555 Fayetteville Street
Suite 1100
Raleigh, NC 27601

t: 919.755.2100
f: 919.755.2150

Press Millen
Partner
Direct Dial: 919-755-2135
Direct Fax: 919-755-6067
E-mail: Press.Millen@wbd-us.com

Sirs:

I am counsel to Associate Justice Allison Riggs of the North Carolina Supreme Court who, as you know, is a candidate to retain her seat on that Court in this year's election. If you are represented by counsel, you should forward this letter to counsel for their consideration and response.

It has come to our attention that your Committee is running an advertisement in various media attacking Justice Riggs (found at [NC SUP CRT: Griffin "Radical Liberal"](#)). Specifically, that advertisement – which contains the statutorily required legend “Paid for by the Jefferson Griffin Committee” – states that Justice Riggs is a “radical liberal under investigation by the Judicial Standards Commission for her false ads against conservative Judge Jefferson Griffin.”

That statement is false.

I reached out to Ms. Brittany Pinkham, the Executive Director of the North Carolina Judicial Standards Commission, whose attached response indicates that no formal investigation of Justice Riggs is on-going and that Justice Riggs will be issued a notification “in the event that [the issue] becomes germane to Justice Riggs.” (See Response of Pinkham, dated October 16, 2024, attached.)

To the extent, moreover, that your Committee's political advertisement is relying on confidential information revealed from within the Commission – especially confidential information about Justice Riggs as to which she herself has not been informed – that would constitute an egregious violation of the Commission's Rules in an effort to turn the Commission's deliberations into fodder for political attacks. I can imagine no course more likely to undermine judicial independence and the corollary constitutional right to the free speech of judges – not to mention the putative non-partisan status of the Judicial Standards Commission – than for a judge's political committee to use a breach of confidentiality from within the Commission to attack an opponent.



For these reasons, we are demanding that your Committee immediately cease and desist from any further dissemination of the advertisement at issue, whether on television, on-line, or through any other media. Your failure to immediately cease and desist will result in our taking further action, including actions with respect to any disseminating media outlets and/or service providers to the Committee.

Please confirm compliance with this demand to me no later than noon on October 17, 2024.

If you or your counsel have any questions, you may call me. Thank you for your attention to this matter.

Sincerely,

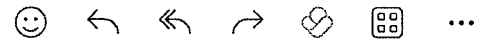
WOMBLE BOND DICKINSON (US) LLP

Pressly M. Millen

cc: Justice Allision Riggs

Fw: Riggs -- Let to JSC.pdf

MP Millen, Press
To: Millen, Press



Wed 10/16/2024 12:24 PM

🔒 This message is encrypted.

[What's encryption?](#)

From: Millen, Press <Press.Millen@wbd-us.com>
Sent: Wednesday, October 16, 2024 12:22 PM
To: Millen, Press <Press.Millen@wbd-us.com>
Subject: Fw: Riggs -- Let to JSC.pdf

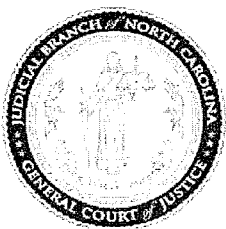
From: Pinkham, Brittany <bpm@coa.nccourts.org>
Sent: Wednesday, October 16, 2024 12:10 PM
To: Millen, Press <Press.Millen@wbd-us.com>
Subject: RE: Riggs -- Let to JSC.pdf

Mr. Millen:

Thank you for reaching out.

As you have pointed out, Judicial Standards Commission Rule 6(a) says that “all complaints and related information received by the Commission, meeting materials and records, investigative files, documents and evidence relating to the disciplinary and disability proceedings, private letters of caution, informal advisory opinions, and all documents and communications related to any of the foregoing are confidential.” However, if a complaint reaches the point of a “formal investigation,” Commission Rule 10(c) requires that the respondent judge be notified in writing by Commission staff and afforded an opportunity to respond. Operating under these Rules, Commission staff will issue such notification in the event that this becomes germane to Justice Riggs.

I hope this was helpful. Please free feel to reach out anytime.



Brittany Pinkham
Executive Director
North Carolina Judicial Standards Commission
North Carolina Judicial Branch
O 919-831-3630

Justice for all
www.NCcourts.org



Exhibit 2



STATE ETHICS COMMISSION
2024 STATEMENT OF ECONOMIC INTEREST

No Change Form

**This entire form must be completed to fulfill
your SEI filing obligation.**

FOR STAFF USE ONLY
Date Received:

RECEIVED

MAY 1 2024

NC ETHICS COMMISSION

Filer's Name (First, Middle, Last)

Prefix	First Name	Middle Name	Last Name	Suffix
Ms.	Siobhan	O'Duffy	Millen	

Reason for Filing (Complete all that apply.)

State Government Job (Specify agency and position.) <i>Member of State Board of Elections</i>	Board/Commission (List the complete names of all State boards on which you are serving or are being considered.) <i>Board of Elections</i>
Currently Serving as a Judicial Officer (Specify office.) <i>(Member)</i>	Currently Serving as a Legislator (Specify House or Senate.)

Are you a **CANDIDATE** for a covered elected office?
(District, Supreme, or Superior Court; Court of Appeals;
Clerk of Court; DA; Legislator; Member, Council of State)

Yes No

If yes, specify office and district/county if applicable:

AFFIRMATION

I have carefully reviewed my most recently filed Statement of Economic Interest Long Form and my responses continue to be true, correct, and complete to the best of my knowledge and belief.

I have not transferred, and will not transfer, any asset, interest, or property for the purpose of concealing it from disclosure while retaining an equitable interest.

I understand that my No Change Form is a public record.

I have read and understand the following statutes:

N.C.G.S. § 138A-26. Concealing or failing to disclose material information.

A filing person who knowingly conceals or knowingly fails to disclose information that is required to be disclosed on a statement of economic interest . . . shall be guilty of a Class 1 misdemeanor and . . . subject to disciplinary action under G.S. 138A-45.

N.C.G.S. § 138A-27. Penalty for false information.

A filing person who provides false information on a statement of economic interest . . . knowing that the information is false is guilty of a Class H felony and shall be subject to disciplinary action under G.S. 138A-45.

I affirm under penalty of perjury that the foregoing is true and correct.

Siobhan Millen
Signature

5/1/24
Date

Siobhan Millen
Printed Name

Submit signed, original documents only. Do not fax or e-mail this form.



STATE ETHICS COMMISSION

2023 STATEMENT OF ECONOMIC INTEREST

This entire form must be completed to fulfill your ethics filing obligation.

For Staff Use Only

Date Received:

RECEIVED

MAY 05 2023

NC ETHICS COMMISSION

Filer's Name (First, Middle, Last)

Prefix	First Name	Middle Name	Last Name	Suffix
Ms.	Siobhan	O'Duffy	Millen	
Current Employer			Job Title	
NOT employed				
Nature or Type of Business				
-				
Reason for Filing (Complete all that apply.)				
State Government Job (Specify agency and position.)			Board/Commission (List the complete names of all State boards on which you are serving or are being considered.)	
			State Board of Elections	
Currently Serving as a Judicial Officer (Specify office.)			Currently Serving as a Legislator (Specify House or Senate)	

Post Service Filer (Specify Office Held in 2022, e.g. judge, legislator, district attorney, or clerk of court.)

A. Do any immediate family members reside in your household?**

Yes No

"Immediate family" includes your spouse (unless legally separated) and unemancipated minor children (under 18). It also includes members of your extended family (your and your spouse's children, grandchildren, parents, grandparents, and siblings, and the spouses of each of those persons) **who reside in your household.

List the full name of **all immediate family members** residing in your household. List unemancipated minors on separate form. Minors may be emancipated by marriage, enlistment in the US military, or court order for emancipation.

Immediate Family Member	Relationship	Employer	Job Title	Nature of Business
Presly M. Millen	husband	Wombé Bond Dickson (US) LLP	partner	law firm
Angus O. Millen	son	Alamo Drafthouse	waiter	movie theater + restaurant

B. List only the initials of all unemancipated minors in your household below. A minor is a child under 18 years old.

List the full name of each minor child on the Confidential Form at the end.

<u>Initials of Unemancipated Minors</u>	Relationship	Employer	Job Title	Nature of Business

Property Interests

1. As of December 31, 2022, 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
<i>Presdy and Siobhan Millen</i>	<i>100% jointly w/ husband</i>	<i>Raleigh</i>	<i>Wake</i>

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

2. At any time during 2021 or 2022, 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

Financial Interests

3. As of December 31, 2022, did you or any members of your immediate family own any of the following financial interests valued at \$10,000 or more? **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.**

A. **Stock** in a publicly owned company?

Yes No

▶ Do not 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 underlying assets.

Owner of Interest	Full Name of Company or ticker symbol

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
<input checked="" type="checkbox"/> None or not known	

C (2). If you know that any entity listed in 3.C or 3.C(1) above has any material business dealings or business contracts with the State of North Carolina, or is regulated by the State, briefly describe that business activity.

Name of Company or Business Entity	Description of Business Activity with the State
<input checked="" type="checkbox"/> None or Not Known	

4. As of December 31, 2022, were you or any members of your immediate family the beneficiaries of a vested trust with a value of \$10,000 or more that you created, established, or controlled?

▶ Do not list assets held in blind trusts. Definitions for "Vested Trust" and "Blind Trust" can be found on our website under "SEIs / SEI Helpful Tips": <https://ethics.nc.gov>

Yes No

Name and Address of Trustee	Description of the Trust	Your Relationship to the Trust

5. As of December 31, 2022, 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.)
<i>Siobhan O. Millen + Pressly M. Millen</i>	<i>Carlvan</i>

6. List each source of income (**not specific amounts**) of more than \$5,000 received by you or any members of your immediate family during 2022. 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 *and/or* 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** 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 Source	Type of Business/ Industry	Type of Income
<input type="checkbox"/> I had no reportable income over \$5,000 in 2022.			
<i>Pressly M. Millen</i>	<i>Wamble Bond Dickinson (US) LLP</i>	<i>law firm</i>	<i>partnership share</i>

Professional and Civic Relationships

7(a). During 2022, 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
<i>Siobhan Millen</i>	<i>board member</i>	<i>Dix Park Conservancy</i>	<i>plan, build & maintain a public park in Raleigh</i>
<i>Siobhan Millen</i>	<i>board member</i>	<i>The Flower Shuttle</i>	<i>recycle donated flowers to give to sick or low-income people</i>

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
<input checked="" type="checkbox"/> None or Not Known	

8. During 2022, were you or any members of your immediate family a director, officer, or governing board member of any society, organization, or advocacy group with an interest in matters over which your agency or board may jurisdiction?

Yes No Legislator/Judicial Officer - You are not required to complete this question if you are filing *solely* because you are a legislator or judicial officer or as a candidate or appointee to those offices. However, if you are also filing this SEI as a member of a State board or as a State employee, answer "yes" or "no" to this question. If your response is "yes," provide additional information.

- ▶ Do not list organizations of which you are only a member and do not serve in a leadership role.

Name of Person	Name of Society, Organization, or Advocacy Group	Leadership Position (Director, Officer, Board Member)

9(a). As of December 31, 2022, were you or a member of your immediate family an employee, director, officer, partner, proprietor, or member or manager of a for profit business?

Name of Person	Relationship to Filer	Name of Company	Role of Person
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No - If "No," proceed to question 10.			
<i>Presley M. Millen</i>	<i>husband</i>	<i>Wamble Bond Dickinson (US) LLP</i>	<i>partner</i>

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, 2022, briefly describe that activity.

Name of Company or Business Entity	Description of Business Activity with the State
<input type="checkbox"/> None or Not Known	
<i>Wamble Bond Dickinson (US) L.L.C</i>	<i>regulated by No State Bar's occasional engagements by state entities</i>

10. Are you a practicing attorney?
 Yes No Judicial Officer/State Attorney In House Attorney

If "Yes", check each category of legal representation in which you or the law firm with which you are affiliated has earned legal fees of more than \$10,000 during 2022.

- | | | | |
|---|---|---|-----------------------------------|
| <input type="checkbox"/> Administrative | <input type="checkbox"/> Admiralty | <input type="checkbox"/> Corporate | <input type="checkbox"/> Criminal |
| <input type="checkbox"/> Decedent's Estates | <input type="checkbox"/> Environmental | <input type="checkbox"/> Insurance | <input type="checkbox"/> Labor |
| <input type="checkbox"/> Local Government | <input type="checkbox"/> Real Property | <input type="checkbox"/> Securities | <input type="checkbox"/> Tax |
| <input type="checkbox"/> Tort litigation (including negligence) | <input type="checkbox"/> Utilities Regulation | <input type="checkbox"/> Other Category | |

11. During 2022, were you a licensed professional (other than an attorney) or did you provide consulting services individually or as a member of a professional association for which you charged or were paid over \$10,000?
 Yes No

Type of Business	Nature of Services Rendered

12. Are you or your employer, or any members of your immediate family, or their employers currently:

- licensed by the State board or agency with which you are or will be associated **or**
- regulated by the State board or agency with which you are or will be associated **or**
- in a business relationship with the State board or agency with which you are or will be associated?

Yes No Legislator/Judicial Officer - You are not required to complete this question if you are filing because you are a legislator or a judicial officer or as a candidate or appointee to those offices. However, if you are also filing as a member of a State board or as a State employee, please answer "yes" or "no" to this question. If you respond "yes," provide additional information.

Name of Person	Name of Employer (if applicable)	Type of Relationship (Licensing, Regulatory, Business)

13. Have you or a member of your immediate family been registered as a lobbyist or lobbyist principal within the 12 months preceding your filing of this SEI?

Yes No

Name of Lobbyist	Lobbyist's Principal	Date of Registration	Registration Expiration

Other Disclosures

14. During 2022, 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

15. During 2022, 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 tuition, travel, lodging, meals, and other similar expenses.

- Yes No Judicial Officer - You are not required to complete this question if you are filing as a judicial officer or a judicial officer candidate or appointee.

- ▶ Do not report gifts you have previously reported on the "Expense Report for Exempted Persons."
- ▶ Legislators are not required to report scholarships paid by a nonpartisan legislative organization of which the legislator or the General Assembly is a member, participant, or affiliate.

Date of Scholarship	Name and Address of Donor(s)	Describe Event	Estimated Market Value

16. Have you been appointed or are you being considered for appointment to a covered board by the Governor or a Council of State member?

Council of State members include:

- ▶ Governor
- ▶ State Auditor
- ▶ Attorney General
- ▶ Commissioner of Insurance
- ▶ Lt. Governor
- ▶ State Treasurer
- ▶ Commissioner of Agriculture
- ▶ Secretary of State
- ▶ Superintendent of Public Instruction
- ▶ Commissioner of Labor

- Yes No

If "Yes," list all contributions you made in 2022 with a cumulative total of more than \$1,000 to the Council of State member who appointed you. Do not include contributions from immediate family members.

- ▶ Contributions are defined broadly in N.C.G.S. 163-278.6(6) and include "any advance, conveyance, deposit, distribution, transfer of funds, loan, payment, gift, pledge or subscription of money or anything of value whatsoever."

Date	Amount	Contributed to
<input checked="" type="checkbox"/> No contribution(s) with a cumulative total of more than \$1,000		

17. Are you an appointee or prospective appointee as:

- a. the head of a principal state department (e.g., cabinet secretary) appointed by the Governor; or
- b. a North Carolina Supreme Court Justice; or a Court of Appeals, Superior, or District Court Judge; or
- c. a member of any of the following boards:
 - ABC Commission
 - Coastal Resources Commission
 - State Board of Education
 - State Board of Elections
 - Division of Employment Security
 - Environmental Management Commission
 - Industrial Commission
 - Human Resources Commission
 - Rules Review Commission
 - Board of Transportation
 - Utilities Commission
 - Wildlife Resources Commission

Yes **No**
 If "No," proceed to question 18.

d. If so, were you appointed or are you being considered for appointment to that position by a Council of State member?

Yes **No**
 If "No," proceed to question 18.

e. If so, you must indicate whether during 2022 you engaged in any of the following activities with respect to or on behalf of the candidate or campaign committee of the Council of State member who appointed you:

i. Collected contributions from multiple contributors, took possession of such multiple contributions, and transferred or delivered those collected contributions to the candidate or committee?

Yes **No**

ii. Hosted a fundraiser at your residence or place of business?

Yes **No**

iii. Volunteered for campaign-related activities, including phone banks, event assistance, mailings, canvassing, surveying, or any other activity that advances the campaign of a candidate?

Yes **No**

18. Have you ever been convicted of a felony for which you have not received either: (i) a pardon; or (ii) an order of expungement?

Yes **No**

Offense	Date of Conviction	County of Conviction	State of Conviction

19. Are you aware of any other information that *you believe* may assist the Ethics Commission in advising you concerning your compliance with the State Government Ethics Act?

Yes **No** If yes, please provide that information below.

Affirmation

The information provided in this Statement of Economic Interest and any attachments are true, complete, and accurate to the best of my knowledge and belief.

I have not transferred, and will not transfer, any asset, interest, or property for the purpose of concealing it from disclosure while retaining an equitable interest.

I understand that my Statement of Economic Interest and any attachments except for the Confidential Form regarding Unemancipated Children are public records.

I have read and understand the following statutes:

N.C.G.S. § 138A-26. Concealing or failing to disclose material information.

A filing person who knowingly conceals or knowingly fails to disclose information that is required to be disclosed on a statement of economic interest . . . shall be guilty of a Class 1 misdemeanor and subject to disciplinary action under G.S. 138A-45.

N.C.G.S. § 138A-27. Penalty for false information.

A filing person who provides false information on a statement of economic interest . . . knowing that the information is false is guilty of a Class H felony and shall be subject to disciplinary action under G.S. 138A-45.

I affirm under penalty of perjury that the foregoing is true and correct.

Siobhan Mullen

Signature

5/4/23

Date

Siobhan Mullen

Printed Name

Submit signed, original documents only. Do not fax or e-mail this form.