



STATE OF NORTH CAROLINA

WAKE COUNTY

BEFORE THE
DISCIPLINARY HEARING COMMISSION
OF THE
NORTH CAROLINA STATE BAR

18 DHC **28**

THE NORTH CAROLINA STATE BAR,

Plaintiff

v.

CHRISTOPHER ALBERT STELLA,
Attorney,

Defendant

COMPLAINT

Plaintiff, complaining of Defendant, alleges and says:

1. Plaintiff, the North Carolina State Bar ("State Bar"), is a body duly organized under the laws of North Carolina and is the proper party to bring this proceeding under the authority granted it in Chapter 84 of the General Statutes of North Carolina, and the Rules and Regulations of the North Carolina State Bar (Chapter 1 of Title 27 of the North Carolina Administrative Code).

2. Defendant, Christopher Albert Stella ("Stella" or "Defendant"), was admitted to the North Carolina State Bar on October 10, 2017, and is, and was at all times referred to herein, an attorney at law licensed to practice in North Carolina, subject to the laws of the State of North Carolina, the Rules and Regulations of the North Carolina State Bar, and the Rules of Professional Conduct.

Upon information and belief:

3. During all or part of the relevant periods referred to herein, Defendant was licensed to practice law in his domicile of Guilford County, North Carolina.

4. On the early afternoon of Thursday, October 19, 2017, at approximately 1:30 p.m., Defendant visited the Goldston Park area ("park") near Cassell and South Elm Streets in High Point, North Carolina for the purpose of engaging a prostitute for the performance of sexual services.

5. At the park, Defendant stopped his vehicle near C.H. (“C.H.”)¹, a prostitute, and asked her if she was “working” that afternoon.

6. C.H. was not Defendant’s spouse.

7. When C.H. responded that she was available for hire, Defendant instructed her to enter his vehicle.

8. C.H. and Defendant agreed that C.H. would perform a sexual act as defined in N.C. Gen. Stat. § 14-27.20(4) in exchange for the payment of money.

9. With C.H. as a passenger in his vehicle, Defendant proceeded to an automated teller machine (“ATM”) at a nearby bank where he withdrew money in order to pay C.H. for the sexual act.

10. C.H. then directed Defendant to her residence where C.H. performed the sexual act on Defendant.

11. Defendant engaged in the sexual act for the purpose of sexual arousal or gratification with a prostitute.

12. After C.H. performed the agreed upon sexual act, Defendant argued that he owed C.H. an amount lesser than agreed.

13. C.H. threatened that she would claim Defendant had raped her if he failed to pay her as agreed.

14. Defendant became emotional, telling C.H. to “name [her] price.”

15. C.H. responded that she would accept a larger amount of money to leave Defendant alone.

16. Defendant told C.H. he did not have the money on him but would return to the bank’s ATM to obtain the necessary money.

17. Defendant, C.H., and C.H.’s male housemate got into Defendant’s vehicle and drove to the same ATM.

18. Defendant withdrew additional amounts of money and gave C.H. the cash in payment.

19. Defendant then returned C.H. and her housemate to the area near C.H.’s residence.

¹ The prostitute’s name has been abbreviated to protect her identity.

20. During her encounter with Defendant, C.H. never brandished a knife to rob or sexually assault Defendant.

21. Defendant did not engage in vaginal sexual intercourse with C.H.

22. By Defendant engaging in the sexual act with C.H., a prostitute, for the purpose of his sexual arousal or gratification, Defendant committed the crime of patronizing a prostitute in violation of N.C. Gen. Stat. § 14-205.2(a)(1).

23. On that same Thursday, October 19, 2017, at approximately 7:50 p.m., Defendant falsely reported to the High Point Police Department that he had been the victim of a robbery and sexual assault by an unidentified prostitute earlier that same afternoon.

24. In his police report to the investigating officer, Defendant falsely informed the officer about the reason he had visited the park near Cassell and South Elm Streets in High Point.

25. Defendant also falsely reported to the investigating officer the following: that the unidentified prostitute had asked him for a ride and exposed her breasts to him; that Defendant had asked the unidentified prostitute to exit his vehicle; that the unidentified prostitute had brandished a knife at him and told him he owed her money but refused to exit Defendant's vehicle until he paid her; that at knife point the unidentified prostitute ordered Defendant to drive her to her residence; and, that after entering her residence and her performing a sexual act on him, the unidentified prostitute attempted to have sexual intercourse with Defendant against his will during which there was partial penetration.

26. By willfully filing the false police report for the purpose of hindering or obstructing the investigating officer's duty to determine if any crimes had been committed by the encounter between Defendant and C.H., Defendant committed the crime of making a false police report to a law enforcement officer in violation of N.C. Gen. Stat. § 14-225(a).

27. Defendant's making of the false police report diverted the investigating officers and their resources from other criminal matters.

THEREFORE, Plaintiff alleges that Defendant's foregoing actions constitute grounds for discipline pursuant to N.C. Gen. Stat. § 84-28(b)(2) in that Defendant violated the Rules of Professional Conduct as follows:

- a) By engaging in the sexual act with a prostitute for the purpose of his sexual arousal or gratification, Defendant committed a criminal act, N.C. Gen. Stat. § 14-205.2(a)(1), in violation of Rule 8.4(b), that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects;
- b) By making a false report to the High Point Police about being forcibly robbed and sexually assaulted by the prostitute wielding a

knife, Defendant committed a criminal act, N.C. Gen. Stat. § 14-225(a), in violation of Rule 8.4(b), that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects; and,

- c) By making a false report to the High Point Police, Defendant engaged in conduct involving dishonesty, fraud, deceit or misrepresentation in violation of Rule 8.4(c), and engaged in conduct that is prejudicial to the administration of justice in violation of Rule 8.4(d).

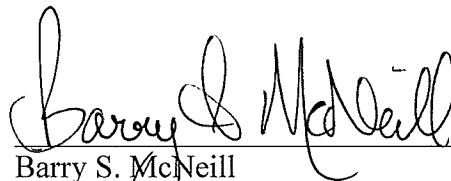
WHEREFORE, Plaintiff prays that:

(1) Disciplinary action be taken against Defendant in accordance with N.C. Gen. Stat. § 84-28(a) and § .0114 of the Discipline and Disability Rules of the North Carolina State Bar (27 N.C.A.C. 1B § .0114), as the evidence on hearing may warrant;

(2) Defendant be taxed with the administrative fees and costs permitted by law in connection with this proceeding; and

(3) For such other and further relief as is appropriate.

This the 30th day of May 2018.



Barry S. McNeill

Deputy Counsel

State Bar No. 8887

The North Carolina State Bar

P.O. Box 25908

Raleigh, NC 27611

919-828-4620

Attorney for Plaintiff

Signed pursuant to 27 N.C. Admin. Code 1B
§ .0113(n) and §.0105(a)(10).



DeWitt F. McCarley, Chair
Grievance Committee