

STATE OF NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

FORSYTH COUNTY

MAYMEAD, INC.,

Plaintiff,

v.

LAND USE STRATEGIES, LLC and
CHRISTOPHER HOPKINS,

Defendants.

COMPLAINT

Plaintiff, Maymead, Inc. (“Maymead”) brings the following allegations and claims against defendants:

I.
INTRODUCTION

Maymead, Inc. has a contract to purchase property in the Village of Clemmons, subject to the condition that it receive an air quality permit from Forsyth County. A yet-disclosed competitor hired Land Use Strategies and its partner, Christopher Hopkins, to disrupt Maymead’s entry into the marketplace and interfere with its acquisition of land for an asphalt plant in an attempt to manipulate the competition for and pricing of asphalt in the Forsyth County region.

To protect his client’s market position and competitive and pricing advantage, Christopher Hopkins established and used fake names and false identities, created fake Facebook pages and websites, pretended to be a neighbor of the Clemmons property, and gained entry into citizens’ homes under false pretenses in order to create opposition where opposition did not exist, to disseminate information known to be false, misleading, or inaccurate about asphalt plants and the process by which the air quality permit approval is achieved.

Defendants' actions were calculated and intended to prompt innocent citizens to (1) become defendants' and their client's agents in the disruption of legitimate legal processes and thereby interfere with the supply, demand, and consequent pricing of asphalt; and (2) to eliminate or minimize competition in the marketplace, thereby unfairly protecting the market advantage of the company that hired defendants.

Defendants' actions are imputed against their yet-disclosed client, whose identity will be sought in discovery.

II.

PARTIES, JURISDICTION, AND VENUE

1. Maymead, Inc. is a Tennessee-based company registered to do business in North Carolina, with offices and facilities in the State of North Carolina.

2. Land Use Strategies, LLC is a company registered in each of California, Colorado, and Tennessee that solicits and conducts business in the State of North Carolina. Its registered agent is listed as Land Use Strategies, LLC, 125 Generals Retreat Pl, Franklin, Tennessee, 37064.

3. Upon information and belief, Christopher Hopkins has at all relevant times been a partner and agent of Land Use Strategies who worked extensively in Forsyth County, N.C. and who held himself out publicly under the alias "Chris Sanderson," a concerned citizen and resident of the Village of Clemmons in Forsyth County.

4. Venue is proper in Forsyth County pursuant to N.C. Gen. Stat. §§ 1-76, 1-77, and 1-82 as the county where the causes of action arose; because the facts touch and concern actions to affect the regulation, use, and acquisition of real estate in Forsyth County; Forsyth County is where the affected real estate is located; and Forsyth County is where legitimate governmental processes were interfered with.

5. Jurisdiction is proper pursuant to N.C. Gen. Stat. § 7A-240.

III. **FACTS**

6. Maymead is a company whose core business is the production and sale of asphalt, a commodity in commerce subject to intensive contract bidding for road construction and other projects.

7. Maymead entered into a contract to acquire property at 6010 Gun Club Road (the “Property”) in the Village of Clemmons for the sole purpose of constructing an asphalt plant that will produce asphalt for the market in Forsyth and surrounding counties.

8. Sites like the Property are extremely rare because it was (a) one of very few sites in the region on the market and already properly zoned for use as an asphalt plant; (b) easily accessible to growth markets; and (c) adequate in size and topography. Loss of the contract to purchase the Property could prevent Maymead’s entry into the market for months or years.

9. Because the Property is proximate to Interstate 40, it is well situated to enable Maymead to become highly competitive in the Winston-Salem, Clemmons, Lewisville, Mocksville, Lexington, and surrounding markets and to become a successful bidder against the few companies with facilities nearby.

10. Maymead cannot acquire the Property until Forsyth County issues an air quality permit for an asphalt plant. It applied for an air quality permit on July 16, 2026.

11. Land Use Strategies markets itself as a public relations and consulting firm capable of infiltrating and manipulating neighborhood groups opposed to the mining and construction materials industries.

12. Soon after Maymead filed an application for an air quality permit, Land Use Strategies was hired by a yet-disclosed competitor to (a) interfere with Maymead’s contract to

purchase the Property; (b) deter or prevent Maymead from entering the marketplace as a competitor; (c) unfairly prevent and stymie competition, thereby keeping prices higher for consumers; (d) protect their client's market advantage; and (e) unfairly and deceptively use citizens and governments as agents and instruments in their attempt to limit and control competition in the industry.

13. Among other things, Land Use Strategies, knowingly acted through its partner Mr. Hopkins, to establish and use fake names and false identities (among other identities, Mr. Hopkins identified himself as "Chris Sanderson"), create fake Facebook pages and websites, print yard signs and fliers, falsely pretend to be a neighbor of the Clemmons site and its true neighbors, and to deceptively gain entry into citizens' homes under false pretenses.

14. The purposes of Land Use Strategies' deceptions—including the dissemination of information known to be false, misleading, or inaccurate about asphalt plants, their effect on nearby citizens, and the process by which the permit approval is achieved—was to (a) create public opposition where opposition did not exist; (b) prompt innocent citizens to become their agents in the disruption of the market supply and pricing of asphalt; (c) eliminate competition in the marketplace; and (d) to unfairly protect the market advantage of the company that hired it and Christopher Hopkins.

15. Citizens were, in fact, deceived by Mr. Hopkins, and at his encouragement and bidding they attempted to persuade the Village of Clemmons to revoke the Property's underlying zoning and to take any other possible steps to stop the purchase and sale of the Property.

16. Citizens also were manipulated and induced to attend the August 27, 2026 meeting of the Forsyth County Board of Commissioners to put public political pressure on the County to stop or delay the process of air quality permit approval based upon perceived injuries to their health that Defendants knew were based upon falsehoods and misinformation.

17. Maymead was forced to divert its personnel and resources, spend inordinate time and energy away from its regular duties and business development, and incur various costs, including the hiring of special legal counsel to combat these falsehoods and to proactively prevent local governments from taking actions damaging to Maymead and its contractual interests in the Property, all to the injury and detriment of Maymead's business in other locations resulting from its diversion of resources.

FIRST CAUSE OF ACTION
(Unfair and Deceptive Trade Practices, N.C. Gen. Stat. § 75-1.1)

18. Maymead incorporates and realleges the previous allegations of this Complaint.

19. The actions described above were unfair, deceptive, fraudulent and conducted in extreme bad faith.

20. Defendants' actions were in and affecting commerce because they affected and involved the commercial activities of multiple businesses, including Maymead.

21. Maymead was injured because its management was forced to divert its resources and to spend numerous hours, substantial time, and substantial financial resources pre-empting and preventing the damage intended to be caused by Defendants and their client.

22. Such actions constitute unfair and deceptive trade practices under N.C. Gen. Stat. §75-1.1.

23. As a direct and proximate result of Defendants' unfair and deceptive practices, Maymead has been damaged in excess of \$25,000 in an amount to be proven at trial. Moreover,

Maymead is entitled to have its damages trebled and its attorneys' fees awarded pursuant to North Carolina law.

SECOND CAUSE OF ACTION
(Tortious Interference with Prospective Economic Advantage)

24. Maymead incorporates and realleges the previous allegations of this Complaint.

25. Maymead has a valid and reasonable expectation that it can receive an air quality permit and retain the existing zoning of its land, thereby enabling it to become a competitor in the marketplace and enter into prospective business relationships.

26. Land Use Resources and Christopher Hopkins were aware of Maymead's expectations and intentionally and without any legitimate business justification maliciously attempted to prohibit or deter Maymead from entering the local market for asphalt production and sale.

27. As described above, Maymead was injured because its management was forced divert its resources and to spend numerous hours, substantial time, and substantial financial resources pre-empting and preventing the damage intended to be caused by Land Use Strategies.

28. The above-described allegations constitute tortious interference with prospective economic advantage.

29. As a direct and proximate result of Defendants' unfair and deceptive practices, Maymead has been damaged in excess of \$25,000 in an amount to be proven at trial.

THIRD CAUSE OF ACTION
(Fraud)

30. Maymead incorporates and realleges the previous allegations of this Complaint.

31. Defendants' numerous misstatements made to citizens about asphalt plants and the false social media pages and sham identities were calculated to deceive innocent citizens and did

in fact deceive innocent citizens to induce them to become unwitting participants and agents in Defendants' efforts to damage and injure Maymead by prohibiting its entry into the market and thereby manipulating the price of asphalt and the cost of construction generally.

32. Upon information and belief, these fraudulent statements were made around and leading up to August 27, 2026, the date of the meeting of the Forsyth County Board of Commissioners.

33. Upon information and belief, these fraudulent statements were made both in individuals' homes, neighboring the property, and through various social media platforms, including, but not limited to, Facebook and Instagram.

34. Upon information and belief, these fraudulent statements included but were not limited to material misrepresentations regarding the impact Maymead's proposed asphalt plant would have on neighboring properties and their occupants' health.

35. The above-described facts constitute fraud.

36. As a direct and proximate result of Defendants' fraud, Maymead has been damaged in excess of \$25,000 in an amount to be proven at trial.

FOURTH CAUSE OF ACTION **(Abuse of Process)**

37. Maymead incorporates and realleges all previous allegations of this Complaint

38. The actions described above constitute defendants' attempt to wrongfully and maliciously interfere with the legal processes by which the Village of Clemmons manages its zoning maps and Forsyth County reviews and processes its applications for air quality permits.

39. There was no legitimate business purpose in defendants' attempts to manipulate citizens and to use them as agents to manipulate the market for asphalt.

40. The actions described above constitute an abuse of process.

41. As a direct and proximate result of Defendants' fraud, Maymead has been damaged in excess of \$25,000 in an amount to be proven at trial.

FIFTH CAUSE OF ACTION
(N.C. Gen. Stat. §§ 75-1, 75-2)

42. Maymead incorporates and realleges all previous allegations of this Complaint.

43. Chapter 75 of the North Carolina Statutes generally governs unlawful business practices including antitrust violations such as restraints of trade and monopolization.

44. Defendants, with a competitor yet-disclosed, entered into a contract, combination, or conspiracy between two or more persons in restraint of, or to monopolize, trade or commerce in the asphalt market, a substantial part of which occurred within and around Forsyth County.

45. Defendants' unlawful conduct substantially affected North Carolina's trade and commerce.

46. As a direct and proximate cause of Defendants' unlawful conduct, Plaintiff has been injured in its business and is threatened with further injury, both in excess of \$25,000 in an amount to be proven at trial.

47. By reason of the foregoing, Plaintiff is entitled to seek all forms of relief available, including treble damages, attorneys' fees and costs, under N.C. Gen. Stat. §75-1, *et seq.*

SIXTH CAUSE OF ACTION
(Civil Conspiracy)

48. Maymead incorporates and realleges all previous allegations of this Complaint.

49. Defendants, along with the yet-disclosed competitor, entered into a common scheme to violate the law as described herein, including, but not limited to, disrupting Maymead's entry into the marketplace and interfering with its acquisition of land for an asphalt plant in an

attempt to manipulate the competition for and pricing of asphalt in Forsyth County and its surrounding areas.

50. Upon information and belief, during the time of the planning of the common scheme, Defendants were well aware of the illegality of the scheme. They nonetheless encouraged, supported, and agreed to the common scheme.

51. The common scheme was based upon an agreement, informal or formal, suggestions, and encouragement between and among Defendants and the yet-disclosed competitor.

52. As a direct and proximate result of Defendants' conduct, Maymead has been damaged in excess of \$25,000 in an amount to be proven at trial.

WHEREFORE, Maymead respectfully requests the following relief:

1. That it receive all compensatory damages against defendants on these causes of action.
2. That all damages against defendants be trebled pursuant to N.C. Gen. Stat. Chapter 75.
3. That Maymead receive full compensation for legal fees as allowed by law.
4. That all damages against defendants shall be ordered jointly and severally.
5. That Maymead be allowed to amend its pleadings to include the company who hired defendants once that company has been disclosed in discovery.
6. That the allegations against defendants be imputed to the company that hired them.
7. For such other and further relief as is reasonable and just.

This the 21st day of September 2026.

s/Thomas E. Terrell, Jr.

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