

STATE OF TENNESSEE

CIRCUIT COURT FOR JEFFERSON COUNTY

COUNT ONE

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, between **January 1, 2019 and October 21, 2020**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously and knowingly exercise control over property, to wit: U.S. currency of **Adam Taylor, d/b/a Priority Senior Care, LLC**, having a value of \$10,000.00 or more, without the owner's effective consent and with the intent to deprive the owner thereof, in violation of T.C.A. §39-14-103, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT TWO

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **January 21, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$203.05 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2306, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT THREE

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **January 25, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$200.00 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2262, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT FOUR

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **January 28, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$110.82 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2296, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT FIVE

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **January 28, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$200.00 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2307, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT SIX

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **February 11, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$410.96 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2329, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT SEVEN

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **February 11, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$852.10 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2335, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT EIGHT

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **February 25, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$432.98 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2504, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT NINE

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **February 25, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$641.03 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2506, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT TEN

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **February 28, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$500.21 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2449, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT ELEVEN

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **March 12, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$852.10 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2503, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT TWELVE

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **March 25, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$1,006.26 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2560, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT THIRTEEN

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **March 25, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$1,006.26 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2561, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT FOURTEEN

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **April 8, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$766.63 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2507, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT FIFTEEN

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **April 8, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$766.63 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2562, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT SIXTEEN

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **April 22, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$1,029.98 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2564, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT SEVENTEEN

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **April 22, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$1,029.98 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2620, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT EIGHTEEN

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **May 6, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$905.46 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2565, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT NINETEEN

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **May 6, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$905.46 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2566, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT TWENTY

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **May 6, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$905.46 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2746, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT TWENTY-ONE

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **May 20, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$1,013.68 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2567, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT TWENTY-TWO

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **June 3, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$1,192.94 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2791, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT TWENTY-THREE

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **June 3, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$1,192.94 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2792, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT TWENTY-FOUR

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **June 17, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$988.64 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2816, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT TWENTY-FIVE

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **July 1, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$1,062.51 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2891, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

COUNT TWENTY-SIX

The Grand Jurors for the State of Tennessee, having been duly summoned, elected, impaneled, sworn, and charged to inquire for the body of the County and State aforesaid, present that **TONYA NICOLE LINDSEY**, on or about **July 15, 2019**, before the finding of this indictment in the State and County aforesaid, did unlawfully, feloniously, and with intent to defraud **Adam Taylor, d/b/a Priority Senior Care, LLC** of the sum of \$1,057.68 forge, without the authorization of **Adam Taylor**, a certain writing, to wit: a payroll check numbered 2898, in violation of T.C.A. §39-14-114, contrary to the statute, and against the peace and dignity of the State of Tennessee.

James B. Dunn

DISTRICT ATTORNEY GENERAL
By: S. Alan Dorr

True Bill

NO.: *15057*
PRESENTMENT

LIST OF WITNESSES:

1. *David E. Cavenport*
FOREMAN OF THE GRAND JURY
2. *Betsy Honaker*
3. *Jenna Daniel*
4. *Margaret Asher*
5. *April Dent*
6. *Tim Stott*
7. *Honora Meadows III*
8. *Justin Hill*
9. *Rae Williamson*
10. *Boyd W. Hill*
11. *Nicole Bicef*
12. *Anna [unclear]*
13. *Robert [unclear]*

STATE OF TENNESSEE
VS.

TONYA NICOLE LINDSEY

THEFT OVER \$10,000.00;
FORGERY (25 COUNTS).

Prosecutor

LT. ERIC THOMAS, JCPD

Witness sworn by me in the presence
of the Grand Jury April 5, 2021.

David E. Cavenport
Foreman of the Grand Jury

Filed *5th* day of *Apr.*, 2021

James B. Dunn Clerk

LT. ERIC THOMAS, JCPD

DUSTIN HILL, JCPD

ADAM TAYLOR
PRIORITY SENIOR CARE, LLC
806 UNIVERSAL STREET
JEFFERSON CITY, TN 37760

SANDY NICHOLS
PRIORITY SENIOR CARE, LLC
806 UNIVERSAL STREET
JEFFERSON CITY, TN 37760

DAVID BURNEY, CPA
1443 WA-NI VILLAGE ROAD
RUTLEDGE, TN 37861

TENNESSEE COMPTROLLER OF THE TREASURY
DIVISION OF INVESTIGATIONS
5401 KINGSTON PIKE, BLDG. 2, SUITE 300
KNOXVILLE, TN 37919

TENNESSEE COMPTROLLER OF THE TREASURY
DIVISION OF INVESTIGATIONS
5401 KINGSTON PIKE, BLDG. 2, SUITE 300
KNOXVILLE, TN 37919

Clerk: Summon all named witnesses
for the State.
JAMES B. DUNN
DISTRICT ATTORNEY GENERAL