

TRUE BILL

STATE OF TENNESSEE
LINCOLN COUNTY

JANUARY SESSION, 2023, CRIMINAL COURT
MAY 16, 2023

COUNT ONE

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

JENNIFER SUZANNE HENRY

on or about between the 6th day of May, 2019, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, knowingly did obtain certain property, to-wit: United States currency, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, the property of South Central Human Resource Agency, without the effective consent of South Central Human Resource Agency, with the intent to deprive South Central Human Resource Agency of the property, in violation of Tennessee Code Annotated Section 39-14-103, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT TWO

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

JENNIFER SUZANNE HENRY

on or about between the 6th day of May, 2019, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, knowingly did exercise control over certain property, to-wit: United States currency, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, the property of South Central Human Resource Agency, without the effective consent of South Central Human Resource Agency, with the intent to deprive South Central Human Resource Agency of the property, in violation of Tennessee Code Annotated Section 39-14-103, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

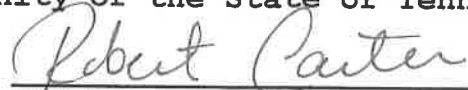
TRUE BILL

COUNT THREE

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

JENNIFER SUZANNE HENRY

on or about and between the 6th day of May, 2019, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, did alter, make, complete, execute or authenticate a writing so that it purported to be the act of another who did not authorize that act, described or depicted as follows: government documents/time sheets, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, with the intent to defraud or harm another, to-wit: South Central Human Resource Agency, in violation of Tennessee Code Annotated Section 39-14-114, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT FOUR

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

JENNIFER SUZANNE HENRY

on or about and between the 6th day of May, 2019, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, did issue, transfer, register the transfer of, pass, publish, or otherwise utter a forged writing described or depicted as follows: government documents/time sheets, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, with the intent to defraud or harm another, to-wit: South Central Human Resource Agency, in violation of Tennessee Code Annotated Section 39-14-114, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT FIVE

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

JENNIFER SUZANNE HENRY

on or about and between the 6th day of May, 2019, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, intentionally did make or alter an object, to-wit: time sheets of Kani Johnson, Makayla Leake and Dustin Simmons, in whole or in part, so that it appears to have value because of source or authorship that it does not have, with intent to sell, pass or otherwise utter it, in violation of Tennessee Code Annotated Section 39-14-115, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

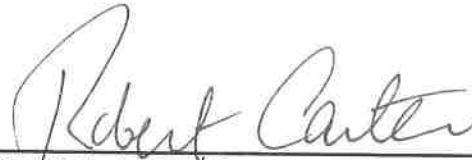
TRUE BILL

COUNT SIX

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

JENNIFER SUZANNE HENRY

on or about and between the 6th day of May, 2019, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, did knowingly make a false entry in a governmental record, to-wit: time sheets of Kani Johnson, Makayla Leake, and Dustin Simmons, in violation of Tennessee Code Annotated Section 39-16-504 and the peace and dignity of the State of Tennessee. The above-named concealed the evidence of her criminal acts so as to toll the applicable statute of limitations pursuant to Tennessee Code Annotated Section 40-2-103.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT SEVEN

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

JENNIFER SUZANNE HENRY

on or about and between the 6th day of May, 2019, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, intentionally presented time sheets with the knowledge of their falsity and with intent that the time sheets be taken as a genuine government record, to-wit: time sheets of Kani Johnson, Makayla Leake, and Dustin Simmons, in violation of Tennessee Code Annotated Section 39-16-504 and the peace and dignity of the State of Tennessee. The above-named concealed the evidence of her criminal acts so as to toll the applicable statute of limitations pursuant to Tennessee Code Annotated Section 40-2-103.



ROBERT CARTER,
District Attorney General
17th Judicial District

COUNT EIGHT

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

JENNIFER SUZANNE HENRY

on or about and between the 6th day of May, 2019, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, while being a public servant, to-wit: One Stop Operator Program Director, intentionally or knowingly with intent to obtain a benefit from or to harm South Central Human Resource Agency did commit an act relating to the public servant's office or employment, in violation of Tennessee Code Annotated Section 39-16-402 and the peace and dignity of the State of Tennessee. The above-named concealed the evidence of her criminal acts so as to toll the applicable statute of limitations pursuant to Tennessee Code Annotated Section 40-2-103.



ROBERT CARTER,
District Attorney General
17th Judicial District

SUMMONS WITNESSES FOR THE STATE

INVESTIGATOR [REDACTED]
TENNESSEE COMPTROLLER OF THE

[REDACTED]

Affiant

No. 2023-CR-61

STATE OF TENNESSEE

VS.

JENNIFER SUZANNE HENRY

COUNTS 1 & 2
THEFT \$60,000.00-\$250,000.00
T.C.A. SECTION 39-14-103
COUNTS 3 & 4
FORGERY
\$60,000.00-\$250,000.00
T.C.A. SECTION 39-14-114
COUNT 5
CRIMINAL SIMULATION
\$60,000.00-\$250,000.00
T.C.A. SECTION 39-14-115
COUNTS 6 & 7
TAMPERING WITH GOVERNMENT
RECORDS
T.C.A. SECTION 39-16-504
T.C.A. SECTION 40-2-103
COUNT 8
OFFICIAL MISCONDUCT
T.C.A. SECTION 39-16-402
T.C.A. SECTION 40-2-103

A TRUE BILL

Bobby Porter
Foreman of Grand Jury

Robert Carter
ROBERT J. CARTER
District Attorney General

Witnesses sworn during open Court and
sent before the Grand Jury to testify in
the above cause, this 16th day of

May, 2023.

Bobby Porter
Foreman of Grand Jury.

1. Bobby Porter
2. Walt Burton
3. Phyllis Johnson
4. Kim Otter
5. Ann M. J.
6. Mildred Korte
7. Cowen
8. Stephanie McPherson
9. Clayton Johnson
10. Ricky Galt
11. Karl Halcomb
12. [Signature]

TRUE BILL

STATE OF TENNESSEE
LINCOLN COUNTY

JANUARY SESSION, 2023, CRIMINAL COURT
MAY 16, 2023

COUNT ONE

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

KANI JAE BEN JOHNSON

on or about between the 6th day of May, 2019, and the 16th day of October, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, knowingly did obtain certain property, to-wit: United States currency, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, the property of South Central Human Resource Agency, without the effective consent of South Central Human Resource Agency, with the intent to deprive South Central Human Resource Agency of the property, in violation of Tennessee Code Annotated Section 39-14-103, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT TWO

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

KANI JAE BEN JOHNSON

on or about between the 6th day of May, 2019, and the 16th day of October, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, knowingly did exercise control over certain property, to-wit: United States currency, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, the property of South Central Human Resource Agency, without the effective consent of South Central Human Resource Agency, with the intent to deprive South Central Human Resource Agency of the property, in violation of Tennessee Code Annotated Section 39-14-103, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT THREE

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

KANI JAE BEN JOHNSON

on or about and between the 6th day of May, 2019, and the 16th day of October, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, did alter, make, complete, execute or authenticate a writing so that it purported to be the act of another who did not authorize that act, described or depicted as follows: government documents/time sheets, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, with the intent to defraud or harm another, to-wit: South Central Human Resource Agency, in violation of Tennessee Code Annotated Section 39-14-114, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT FOUR

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

KANI JAE BEN JOHNSON

on or about and between the 6th day of May, 2019, and the 16th day of October, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, did issue, transfer, register the transfer of, pass, publish, or otherwise utter a forged writing described or depicted as follows: government documents/time sheets, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, with the intent to defraud or harm another, to-wit: South Central Human Resource Agency, in violation of Tennessee Code Annotated Section 39-14-114, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT FIVE

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

KANI JAE BEN JOHNSON

on or about and between the 6th day of May, 2019, and the 16th day of October, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, intentionally did make or alter an object, to-wit: time sheets of Kani Johnson, Makayla Leake and Dustin Simmons, in whole or in part, so that it appears to have value because of source or authorship that it does not have, with intent to sell, pass or otherwise utter it, in violation of Tennessee Code Annotated Section 39-14-115, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT SIX

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

KANI JAE BEN JOHNSON

on or about and between the 6th day of May, 2019, and the 16th day of October, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, did knowingly make a false entry in a governmental record, to-wit: time sheets of Kani Johnson, Makayla Leake, and Dustin Simmons, in violation of Tennessee Code Annotated Section 39-16-504 and the peace and dignity of the State of Tennessee. The above-named concealed the evidence of his criminal acts so as to toll the applicable statute of limitations pursuant to Tennessee Code Annotated Section 40-2-103.



ROBERT CARTER,
District Attorney General
17th Judicial District

SUMMONS WITNESSES FOR THE STATE

INVESTIGATOR

TENNESSEE COMPTROLLER OF THE

Affiant

No. 2023 CR-64

STATE OF TENNESSEE

VS.

KANI JAE BEN JOHNSON

COUNTS 1 & 2
 THEFT \$60,000.00-\$250,000.00
 T.C.A. SECTION 39-14-103
 COUNTS 3 & 4
 FORGERY
 \$60,000.00-\$250,000.00
 T.C.A. SECTION 39-14-114
 COUNT 5
 CRIMINAL SIMULATION
 \$60,000.00-\$250,000.00
 T.C.A. SECTION 39-14-115
 COUNT 6
 TAMPERING WITH GOVERNMENT
 RECORDS
 T.C.A. SECTION 39-16-504
 T.C.A. SECTION 40-2-103

A TRUE BILL

Bobby Port
Foreman of Grand Jury

Robert Carter
ROBERT J. CARTER
District Attorney General

1. Bobby Port
2. Gold Barnes
3. Gladys Wilson
4. Kim O'Hara
5. Sam
6. Mildred Foster
7. Arch
8. Stephanie McPherson
9. Jimmy Johnson
10. Ruby Port
11. Kari Halcomb
12. So

Witnesses sworn during open Court and sent before the Grand Jury to testify in the above cause, this 16th day of

May, 2023.

Bobby Port
Foreman of Grand Jury.

TRUE BILL

STATE OF TENNESSEE
LINCOLN COUNTY

JANUARY SESSION, 2023, CRIMINAL COURT
MAY 16, 2023

COUNT ONE

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

MAKAYLA NICOLE LEAKE

on or about between the 6th day of September, 2020, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, knowingly did obtain certain property, to-wit: United States currency, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, the property of South Central Human Resource Agency, without the effective consent of South Central Human Resource Agency, with the intent to deprive South Central Human Resource Agency of the property, in violation of Tennessee Code Annotated Section 39-14-103, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT TWO

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

MAKAYLA NICOLE LEAKE

on or about between the 6th day of September, 2020, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, knowingly did exercise control over certain property, to-wit: United States currency, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, the property of South Central Human Resource Agency, without the effective consent of South Central Human Resource Agency, with the intent to deprive South Central Human Resource Agency of the property, in violation of Tennessee Code Annotated Section 39-14-103, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT THREE

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

MAKAYLA NICOLE LEAKE

on or about and between the 6th day of September, 2020, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, did alter, make, complete, execute or authenticate a writing so that it purported to be the act of another who did not authorize that act, described or depicted as follows: government documents/time sheets, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, with the intent to defraud or harm another, to-wit: South Central Human Resource Agency, in violation of Tennessee Code Annotated Section 39-14-114, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT FOUR

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

MAKAYLA NICOLE LEAKE

on or about and between the 6th day of September, 2020, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, did issue, transfer, register the transfer of, pass, publish, or otherwise utter a forged writing described or depicted as follows: government documents/time sheets, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, with the intent to defraud or harm another, to-wit: South Central Human Resource Agency, in violation of Tennessee Code Annotated Section 39-14-114, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT FIVE

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

MAKAYLA NICOLE LEAKE

on or about and between the 6th day of September, 2020, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, intentionally did make or alter an object, to-wit: time sheets of Kani Johnson, Makayla Leake and Dustin Simmons, in whole or in part, so that it appears to have value because of source or authorship that it does not have, with intent to sell, pass or otherwise utter it, in violation of Tennessee Code Annotated Section 39-14-115, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

COUNT SIX

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

MAKAYLA NICOLE LEAKE

on or about and between the 6th day of September, 2020, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, did knowingly make a false entry in a governmental record, to-wit: time sheets of Kani Johnson, Makayla Leake, and Dustin Simmons, in violation of Tennessee Code Annotated Section 39-16-504 and the peace and dignity of the State of Tennessee. The above-named concealed the evidence of her criminal acts so as to toll the applicable statute of limitations pursuant to Tennessee Code Annotated Section 40-2-103.



ROBERT CARTER,
District Attorney General
17th Judicial District

SUMMONS WITNESSES FOR THE STATE

INVESTIGATOR [REDACTED]
TENNESSEE COMPTROLLER OF THE



No. 2023-CR-65

STATE OF TENNESSEE

VS.

MAKAYLA NICOLE LEAKE

COUNTS 1 & 2
THEFT \$60,000.00-\$250,000.00
T.C.A. SECTION 39-14-103
COUNTS 3 & 4
FORGERY
\$60,000.00-\$250,000.00
T.C.A. SECTION 39-14-114
COUNT 5
CRIMINAL SIMULATION
\$60,000.00-\$250,000.00
T.C.A. SECTION 39-14-115
COUNT 6
TAMPERING WITH GOVERNMENT
RECORDS
T.C.A. SECTION 39-16-504
T.C.A. SECTION 40-2-103

1. Bobby Porter
2. Alex Payne
3. Mark Peltz
4. Kim Petty
5. Ann Linn
6. Mildred Foster
7. Ann Linn
8. Stephanie McPherson
9. Cammy Johnson
10. Ricky Hatten
11. Kate Halcomb
12. Ann Linn

A TRUE BILL

Bobby Porter
Foreman of Grand Jury

Robert Carter
ROBERT J. CARTER
District Attorney General

Witnesses sworn during open Court and
sent before the Grand Jury to testify in
the above cause, this 16th day of

May, 2023.

Bobby Porter
Foreman of Grand Jury.

TRUE BILL

STATE OF TENNESSEE
LINCOLN COUNTY

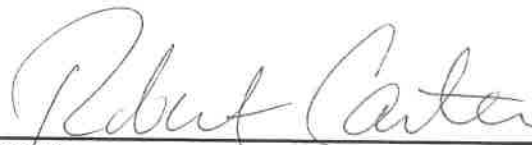
JANUARY SESSION, 2023, CRIMINAL COURT
MAY 16, 2023

COUNT ONE

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

DUSTIN LEE SIMMONS

on or about between the 15th day of December, 2019, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, knowingly did obtain certain property, to-wit: United States currency, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, the property of South Central Human Resource Agency, without the effective consent of South Central Human Resource Agency, with the intent to deprive South Central Human Resource Agency of the property, in violation of Tennessee Code Annotated Section 39-14-103, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT TWO

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

DUSTIN LEE SIMMONS

on or about between the 15th day of December, 2019, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, knowingly did exercise control over certain property, to-wit: United States currency, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, the property of South Central Human Resource Agency, without the effective consent of South Central Human Resource Agency, with the intent to deprive South Central Human Resource Agency of the property, in violation of Tennessee Code Annotated Section 39-14-103, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT THREE

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

DUSTIN LEE SIMMONS

on or about and between the 15th day of December, 2019, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, did alter, make, complete, execute or authenticate a writing so that it purported to be the act of another who did not authorize that act, described or depicted as follows: government documents/time sheets, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, with the intent to defraud or harm another, to-wit: South Central Human Resource Agency, in violation of Tennessee Code Annotated Section 39-14-114, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

TRUE BILL

COUNT FOUR

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

DUSTIN LEE SIMMONS

on or about and between the 15th day of December, 2019, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, did issue, transfer, register the transfer of, pass, publish, or otherwise utter a forged writing described or depicted as follows: government documents/time sheets, of the value of more than sixty thousand (\$60,000.00) dollars but less than two hundred fifty thousand (\$250,000.00) dollars, with the intent to defraud or harm another, to-wit: South Central Human Resource Agency, in violation of Tennessee Code Annotated Section 39-14-114, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

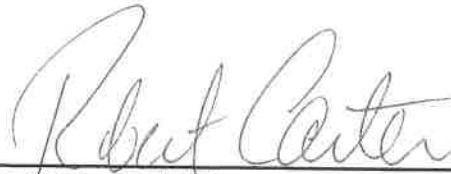
TRUE BILL

COUNT FIVE

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

DUSTIN LEE SIMMONS

on or about and between the 15th day of December, 2019, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, intentionally did make or alter an object, to-wit: time sheets of Kani Johnson, Makayla Leake and Dustin Simmons, in whole or in part, so that it appears to have value because of source or authorship that it does not have, with intent to sell, pass or otherwise utter it, in violation of Tennessee Code Annotated Section 39-14-115, and against the peace and dignity of the State of Tennessee.



ROBERT CARTER,
District Attorney General
17th Judicial District

COUNT SIX

THE GRAND JURORS OF LINCOLN COUNTY, TENNESSEE, duly impaneled and sworn, upon their oath, present that:

DUSTIN LEE SIMMONS

on or about and between the 15th day of December, 2019, and the 12th day of November, 2021, in Lincoln County, Tennessee, and before the finding of this indictment, did knowingly make a false entry in a governmental record, to-wit: time sheets of Kani Johnson, Makayla Leake, and Dustin Simmons, in violation of Tennessee Code Annotated Section 39-16-504 and the peace and dignity of the State of Tennessee. The above-named concealed the evidence of his criminal acts so as to toll the applicable statute of limitations pursuant to Tennessee Code Annotated Section 40-2-103.



ROBERT CARTER,
District Attorney General
17th Judicial District

SUMMONS WITNESSES FOR THE STATE

INVESTIGATOR [REDACTED]
TENNESSEE COMPTROLLER OF THE
TREASURY [REDACTED]

No. 2023-CH-69

STATE OF TENNESSEE

VS.

DUSTIN LEE SIMMONS

COUNTS 1 & 2
THEFT \$60,000.00-\$250,000.00
T.C.A. SECTION 39-14-103
COUNTS 3 & 4
FORGERY
\$60,000.00-\$250,000.00
T.C.A. SECTION 39-14-114
COUNT 5
CRIMINAL SIMULATION
\$60,000.00-\$250,000.00
T.C.A. SECTION 39-14-115
COUNT 6
TAMPERING WITH GOVERNMENT
RECORDS
T.C.A. SECTION 39-16-504
T.C.A. SECTION 40-2-103

1. Bobby Porter
2. Cully Brewer
3. Glady Delap
4. Jim Otley
5. Ann Murr
6. Mildred Hopt
7. Cruz Jensen
8. Stephanie McPherson
9. Jamm Johnson
10. Ricky O'Holler
11. Karl Halcomb
12. Don Hurd

Affiant

A TRUE BILL

Bobby Porter
Foreman of Grand Jury

Robert Carter
ROBERT J. CARTER
District Attorney General

Witnesses sworn during open Court and
sent before the Grand Jury to testify in
the above cause, this 16th day of
May, 2023.

Bobby Porter
Foreman of Grand Jury.