


**STATE OF TENNESSEE, DECATUR COUNTY
CIRCUIT COURT, JUNE, 2021 TERM**

COUNT ONE:

The Grand Jurors of the State of Tennessee, duly elected, impaneled, sworn and charged to inquire in and for the body of the County of Decatur, in the State aforesaid, upon their oath present:

That KELLY CODEGA, heretofore, to-wit: On or about APRIL 27, 2018, before the finding of this indictment, in the County aforesaid, did knowingly or intentionally obtain or exercise control over property, to-wit: ONE HUNDRED FIFTY THREE THOUSAND NINE HUNDRED EIGHTY EIGHT DOLLARS AND FIFTY SEVEN CENTS (\$153,988.57), being the value of SIXTY THOUSAND DOLLARS (\$60,000) OR MORE BUT LESS THAN TWO HUNDRED FIFTY THOUSAND DOLLARS (\$250,000) being the property of THE UNIVERSITY OF TENNESSEE, without the owner's effective consent, with the intent to deprive the said UNIVERSITY OF TENNESSEE thereof, thereby committing the offense of THEFT OF PROPERTY, in violation of T.C.A. §39-14-103(a), against the peace and dignity of the State of Tennessee.


MATTHEW F. STOWE *with express permission*
DISTRICT ATTORNEY GENERAL

**STATE OF TENNESSEE, DECATUR COUNTY
CIRCUIT COURT, JUNE, 2021 TERM**

COUNT TWO:

The Grand Jurors of the State of Tennessee, duly elected, impaneled, sworn and charged to inquire in and for the body of the County of Decatur, in the State aforesaid, upon their oath present:

That KELLY CODEGA, heretofore, to-wit: On or about MAY 23, 2018, before the finding of this indictment, in the County aforesaid, did knowingly or Intentionally obtain or exercise control over property, to-wit: ONE HUNDRED FIFTY THREE THOUSAND THREE HUNDRED SEVENTY-SEVEN DOLLARS AND FIFTY TWO CENTS (\$153,377.52), being the value of SIXTY THOUSAND DOLLARS (\$60,000) OR MORE BUT LESS THAN TWO HUNDRED FIFTY THOUSAND DOLLARS (\$250,000) being the property of THE UNIVERSITY OF TENNESSEE, without the owner's effective consent, with the intent to deprive the said UNIVERSITY OF TENNESSEE thereof, thereby committing the offense of THEFT OF PROPERTY, in violation of T.C.A. §39-14-103(a), against the peace and dignity of the State of Tennessee.



MATTHEW F. STOWE *with express permission*
DISTRICT ATTORNEY GENERAL

**STATE OF TENNESSEE, DECATUR COUNTY
CIRCUIT COURT, JUNE, 2021 TERM**

COUNT THREE:

The Grand Jurors of the State of Tennessee, duly elected, impaneled, sworn and charged to inquire in and for the body of the County of Decatur, In the State aforesaid, upon their oath present:

That KELLY CODEGA, heretofore, to-wit: On or about APRIL 27, 2018, before the finding of this indictment, in the County aforesaid, did knowingly, directly or Indirectly access or cause to be accessed, data for the purpose of effecting the creation or alteration of an electronic transfer of funds with the intent to alter, misappropriate said funds or commit fraud, to-wit: IN THE AMOUNT OF ONE HUNDRED FIFTY THREE THOUSAND NINE HUNDRED EIGHTY EIGHT DOLLARS AND FIFTY SEVEN CENTS (\$153,988.57), being the value of SIXTY THOUSAND DOLLARS (\$60,000) OR MORE BUT LESS THAN TWO HUNDRED FIFTY THOUSAND DOLLARS (\$250,000), thereby committing the offense of VIOLATION OF TENNESSEE PERSONAL AND COMMERCIAL COMPUTER ACT OF 2003, in violation of T.C.A. §39-14-602(a)(3), against the peace and dignity of the State of Tennessee.


MATTHEW F. STOWE *with express*
DISTRICT ATTORNEY GENERAL *permission*

**STATE OF TENNESSEE, DECATUR COUNTY
CIRCUIT COURT, JUNE, 2021 TERM**

COUNT FOUR:

The Grand Jurors of the State of Tennessee, duly elected, Impaneled, sworn and charged to inquire in and for the body of the County of Decatur, in the State aforesaid, upon their oath present:

That KELLY CODEGA, heretofore, to-wit: On or about MAY 23, 2018, before the finding of this indictment, in the County aforesaid, did knowingly, directly or indirectly access or cause to be accessed, data or the purpose of effecting the creation or alteration of an electronic transfer of funds with the intent to alter, misappropriate said funds or commit fraud, to-wit: IN THE AMOUNT OF ONE HUNDRED FIFTY THREE THOUSAND THREE HUNDRED SEVENTY-SEVEN DOLLARS AND FIFTY TWO CENTS (\$153,377.52), being the value of SIXTY THOUSAND DOLLARS (\$60,000) OR MORE BUT LESS THAN TWO HUNDRED FIFTY THOUSAND DOLLARS (\$250,000), thereby committing the offense of VIOLATION OF TENNESSEE PERSONAL AND COMMERCIAL COMPUTER ACT OF 2003, in violation of T.C.A. §39-14-602(a)(3), against the peace and dignity of the State of Tennessee.

Matthew F. Stowe by *KMM*
MATTHEW F. STOWE *with express*
DISTRICT ATTORNEY GENERAL *permission*

21-cr-80

THE STATE OF TENNESSEE

SUMMONS WITNESSES FOR THE STATE

VS.



KELLY CODEGA

- 1. THEFT OF PROPERTY T.C.A. § 39-14-103(a)
- 2. THEFT OF PROPERTY T.C.A. § 39-14-103(a)
- 3. VIOLATION OF TN PERSONAL & COMMERCIAL COMPUTER ACT OF 2003
T.C.A. § 39-14-602(a)(3)
- 4. VIOLATION OF TN PERSONAL & COMMERCIAL COMPUTER ACT OF 2003
T.C.A. § 39-14-602(a)(3)

PROSECUTOR(S)

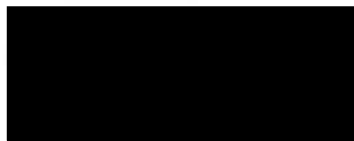


BY ORDER OF

Matthew F. Stowe
 MATTHEW F. STOWE *with express permission*
 DISTRICT ATTORNEY GENERAL

A TRUE BILL / NO TRUE BILL

WITNESSES



Terrence McDonald
 FOREMAN OF THE GRAND JURY
 DECATUR COUNTY, TENNESSEE

WERE SWORN BY THE FOREMAN OF THE
 GRAND JURY TO TESTIFY BEFORE THE
 GRAND JURY ON THIS INDICTMENT THIS
 THE 24TH DAY OF JUNE, 2021.

Terrence McDonald
 FOREMAN OF THE GRAND JURY
 DECATUR COUNTY, TENNESSEE

CODEGA, KELLY.DOC
 REVERSE.DOC

**STATE OF TENNESSEE, DECATUR COUNTY
CIRCUIT COURT, JUNE, 2021 TERM**

COUNT ONE:

The Grand Jurors of the State of Tennessee, duly elected, impaneled, sworn and charged to Inquire In and for the body of the County of Decatur, in the State aforesaid, upon their oath present:

That IMPELI HEALTH, INC., heretofore, to-wit: On or about APRIL 27, 2018, before the finding of this indictment, in the County aforesaid, acting through its high managerial agent, KELLY CODEGA, when within the scope of her employment on behalf of the corporation she engaged in activity constituting Theft of Property, did THEREFORE knowingly or Intentionally obtain or exercise control over property, to-wit: ONE HUNDRED FIFTY THREE THOUSAND NINE HUNDRED EIGHTY EIGHT DOLLARS AND FIFTY SEVEN CENTS (\$153,988.57), being the value of SIXTY THOUSAND DOLLARS (\$60,000) OR MORE BUT LESS THAN TWO HUNDRED FIFTY THOUSAND DOLLARS (\$250,000) being the property of THE UNIVERSITY OF TENNESSEE, without the owner's effective consent, with the intent to deprive the said UNIVERSITY OF TENNESSEE thereof, thereby committing the offense of THEFT OF PROPERTY, in violation of T.C.A. §39-14-103(a), against the peace and dignity of the State of Tennessee.



MATTHEW F. STOWE *with express*
DISTRICT ATTORNEY GENERAL *power*

**STATE OF TENNESSEE, DECATUR COUNTY
CIRCUIT COURT, JUNE, 2021 TERM**

COUNT TWO:

The Grand Jurors of the State of Tennessee, duly elected, impaneled, sworn and charged to inquire in and for the body of the County of Decatur, in the State aforesaid, upon their oath present:

That IMPELI HEALTH, INC., heretofore, to-wit: On or about MAY 23, 2018, before the finding of this indictment, in the County aforesaid, acting through its high managerial agent, KELLY CODEGA, when within the scope of her employment on behalf of the corporation she engaged in activity constituting Theft of Property, did THEREFORE knowingly or intentionally obtain or exercise control over property, to-wit: ONE HUNDRED FIFTY THREE THOUSAND THREE HUNDRED SEVENTY-SEVEN DOLLARS AND FIFTY TWO CENTS (\$153,377.52), being the value of SIXTY THOUSAND DOLLARS (\$60,000) OR MORE BUT LESS THAN TWO HUNDRED FIFTY THOUSAND DOLLARS (\$250,000) being the property of THE UNIVERSITY OF TENNESSEE, without the owner's effective consent, with the intent to deprive the said UNIVERSITY OF TENNESSEE thereof, thereby committing the offense of THEFT OF PROPERTY, in violation of T.C.A. §39-14-103(a), against the peace and dignity of the State of Tennessee.



MATTHEW F. STOWE *with express permission*
DISTRICT ATTORNEY GENERAL

**STATE OF TENNESSEE, DECATUR COUNTY
CIRCUIT COURT, JUNE, 2021 TERM**

COUNT THREE:

The Grand Jurors of the State of Tennessee, duly elected, Impaneled, sworn and charged to inquire in and for the body of the County of Decatur, in the State aforesaid, upon their oath present:

That IMPELI HEALTH, INC., heretofore, to-wit: On or about APRIL 27, 2018, before the finding of this Indictment, in the County aforesaid, acting through its high managerial agent, KELLY CODEGA, when within the scope of her employment on behalf of the corporation she engaged in activity constituting a violation of Tennessee Personal and Commercial Computer Act of 2003, did THEREFORE knowingly, directly or indirectly access or cause to be accessed, data for the purpose of effecting the creation or alteration of an electronic transfer of funds with the intent to alter, misappropriate said funds or commit fraud, to-wit: IN THE AMOUNT OF ONE HUNDRED FIFTY THREE THOUSAND NINE HUNDRED EIGHTY EIGHT DOLLARS AND FIFTY SEVEN CENTS (\$153,988.57), being the value of SIXTY THOUSAND DOLLARS (\$60,000) OR MORE BUT LESS THAN TWO HUNDRED FIFTY THOUSAND DOLLARS (\$250,000, thereby committing the offense of VIOLATION OF TENNESSEE PERSONAL AND COMMERCIAL COMPUTER ACT OF 2003, in violation of T.C.A. §39-14-602(a)(3), against the peace and dignity of the State of Tennessee.


MATTHEW F. STOWE *with express*
DISTRICT ATTORNEY GENERAL *permission*

**STATE OF TENNESSEE, DECATUR COUNTY
CIRCUIT COURT, JUNE, 2021 TERM**

COUNT FOUR:

The Grand Jurors of the State of Tennessee, duly elected, impaneled, sworn and charged to inquire in and for the body of the County of Decatur, in the State aforesaid, upon their oath present:

That IMPELI HEALTH, INC., heretofore, to-wit: On or about MAY 23, 2018, before the finding of this Indictment, in the County aforesaid, acting through its high managerial agent, KELLY CODEGA, when within the scope of her employment on behalf of the corporation she engaged in activity constituting Violation of Tennessee Personal and Commercial Computer Act of 2003, did THEREFORE knowingly, directly or indirectly access or cause to be accessed, data for the purpose of effecting the creation or alteration of an electronic transfer of funds with the intent to alter, misappropriate said funds or commit fraud, to-wit: IN THE AMOUNT OF ONE HUNDRED FIFTY THREE THOUSAND THREE HUNDRED SEVENTY-SEVEN DOLLARS AND FIFTY TWO CENTS (\$153,377.52), being the value of SIXTY THOUSAND DOLLARS (\$60,000) OR MORE BUT LESS THAN TWO HUNDRED FIFTY THOUSAND DOLLARS (\$250,000, thereby committing the offense of VIOLATION OF TENNESSEE PERSONAL AND COMMERCIAL COMPUTER ACT OF 2003, in violation of T.C.A. §39-14-602(a)(3), against the peace and dignity of the State of Tennessee.

Matthew F. Stowe by KMA
MATTHEW F. STOWE *with express*
DISTRICT ATTORNEY GENERAL *permission*

21-CR-72

THE STATE OF TENNESSEE

SUMMONS WITNESSES FOR THE STATE

VS.



IMPELI HEALTH, INC.

- 1. THEFT OF PROPERTY T.C.A. § 39-14-103(a)
- 2. THEFT OF PROPERTY T.C.A. § 39-14-103(a)
- 3. VIOLATION OF TN PERSONAL & COMMERCIAL COMPUTER ACT OF 2003
T.C.A. § 39-14-602(a)(3)
- 4. VIOLATION OF TN PERSONAL & COMMERCIAL COMPUTER ACT OF 2003
T.C.A. § 39-14-602(a)(3)

PROSECUTOR(S)



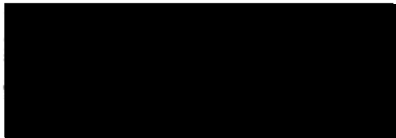
BY ORDER OF

Matthew F. Stowe by *KMM*
 MATTHEW F. STOWE *with express permission*
 DISTRICT ATTORNEY GENERAL

A TRUE BILL / NO TRUE BILL

WITNESSES

Francesca McGonddel



FOREMAN OF THE GRAND JURY
DECATUR COUNTY, TENNESSEE

WERE SWORN BY THE FOREMAN OF THE GRAND JURY TO TESTIFY BEFORE THE GRAND JURY ON THIS INDICTMENT THIS THE 24TH DAY OF JUNE, 2021.

Francesca McGonddel

FOREMAN OF THE GRAND JURY
DECATUR COUNTY, TENNESSEE

IMPELI HEALTH, INC.
REVERSE.DOC