

INDICTMENT

Witness:

Special Agent Ryan Long
Georgia Bureau of Investigation

CASE NO. 23CR00212
DOUGLAS SUPERIOR COURT
OCTOBER TERM 2022

Assigned to Judge
William H. McClain

STATE OF GEORGIA

4/18/23

versus

ROMONA JACKSON JONES (Counts 1&2),

HENRY MITCHELL, III (Count 1),

GREGORY BAKER (Count 1),

BILLY CLYDE PEACOCK (Count 1),

and

FORREST ANTHONY KNIGHT (Count 1).

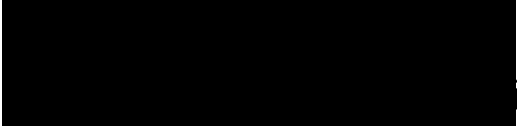
Offenses:

Ct. 1: CONSPIRACY IN RESTRAINT OF FREE AND
OPEN COMPETITION IN TRANSACTIONS,
O.C.G.A. § 16-10-22(b)

Ct. 2: FALSE STATEMENTS, O.C.G.A. § 16-10-20

TRUE Bill, this 24 day of February, 2023.

We the jury find the defendant



Jury Foreperson

Received in open court from the sworn Grand Jury
bailiff and filed in office.

This 24th day of February, 2023.

Foreperson

Annita N. Hembridge
Deputy Clerk, Douglas Superior Court

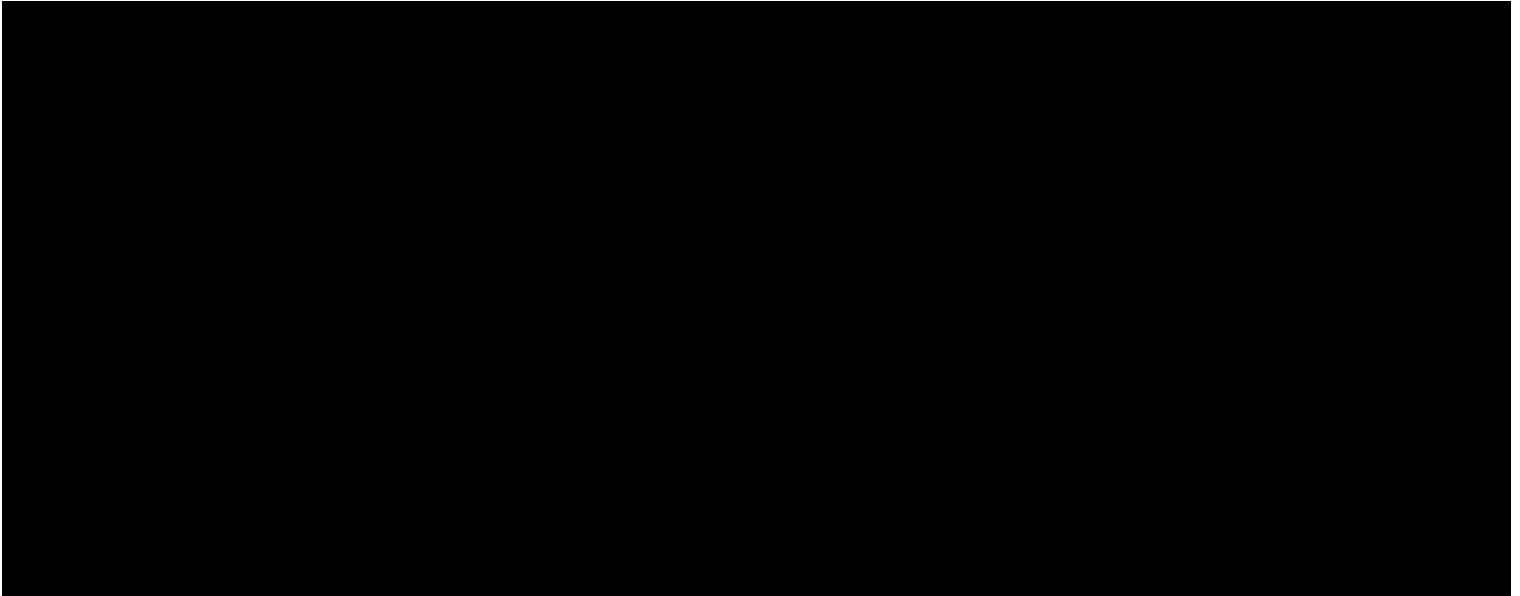
This _____ day of _____, 20 _____.

CHRISTOPHER CARR, Attorney General
State of Georgia

Special Presentment

STATE OF GEORGIA, COUNTY OF DOUGLAS
IN THE SUPERIOR COURT OF SAID COUNTY

The GRAND JURORS selected, chosen and sworn for the County of Douglas to wit:



The defendant, Romona Jackson Jones, herein waives a copy of indictment, list of witnesses, formal arraignment and pleads _____ guilty.

This _____ day of _____, 20____.

Defendant

Attorney for the Defendant

Prosecuting Attorney

The defendant, Gregory Baker, herein waives a copy of indictment, list of witnesses, formal arraignment and pleads _____ guilty.

This _____ day of _____, 20____.

Defendant

Attorney for the Defendant

Prosecuting Attorney

The defendant, Forrest Anthony Knight, herein waives a copy of indictment, list of witnesses, formal arraignment and pleads _____ guilty.

This _____ day of _____, 20____.

Defendant

Attorney for the Defendant

Prosecuting Attorney

The defendant, Henry Mitchell, III, herein waives a copy of indictment, list of witnesses, formal arraignment and pleads _____ guilty.

This _____ day of _____, 20____.

Defendant

Attorney for the Defendant

Prosecuting Attorney

The defendant, Billy Clyde Peacock, herein waives a copy of indictment, list of witnesses, formal arraignment and pleads _____ guilty.

This _____ day of _____, 20____.

Defendant

Attorney for the Defendant

Prosecuting Attorney

COUNT 1 - CONSPIRACY IN RESTRAINT OF FREE AND OPEN COMPETITION

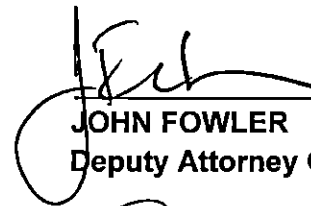
The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **ROMONA JACKSON JONES, HENRY MITCHELL, III, GREGORY BAKER, BILLY CLYDE PEACOCK, and FORREST ANTHONY KNIGHT** (hereinafter "the accused") with the offense of **CONSPIRACY IN RESTRAINT OF FREE AND OPEN COMPETITION**, in violation of **O.C.G.A. § 16-10-22(b)**, for that the said accused, in the County of Douglas and the State of Georgia, between May 29, 2018, and June 26, 2018, did enter into a conspiracy in restraint of free and open competition in a transaction, to wit: a janitorial contract, by and between S&A Express and Douglas County, Georgia, a political subdivision, for goods, materials, and services, to wit: professional janitorial services for the Douglas County Annex Building, and did commit an overt act in furtherance thereof, to wit:

- (1) the accused met and agreed to give the contract to S&A Express, an overt act in furtherance of the conspiracy,
- (2) the accused caused a first Request for Proposal to be withdrawn after S&A Express failed to bid on the contract within the bidding window thus causing a second Request for Proposal to be issued, an overt act in furtherance of the conspiracy,
- (3) the accused requested that S&A Express be walked through the bidding process, an overt act in furtherance of the conspiracy,
- (4) the accused accepted S&A Express' contract bid after the bidding window had closed on the second Request for Proposal, an overt act in furtherance of the conspiracy,
- (5) the accused took sealed bids, opened and reviewed the bids, and added the bid of S&A Express in an amount that was exactly the same as the lowest bid, an overt act in furtherance of the conspiracy,
- (6) the accused, after reviewing the bids, caused S&A Express' bid to be exactly the same as the lowest bid, an overt act in furtherance of the conspiracy,
- (7) the accused signed the county contract with S&A Express prior to the Board of Commissioners voting on whether to adopt the contract, and
- (8) the accused cast a vote in favor of the county adopting the contract, an overt act in furtherance of the conspiracy,

and the applicable statute of limitations was tolled from March 14, 2020 until June 30, 2021 in accordance with the Georgia Supreme Court's declared Statewide Judicial Emergency, enacted pursuant O.C.G.A. § 38-3-62 on March 14, 2020, contrary to the laws of the State of Georgia, the good order, peace, and dignity thereof.

COUNT 2 – FALSE STATEMENTS

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, further charge and accuse **ROMONA JACKSON JONES** with the offense of **FALSE STATEMENTS**, in violation of **O.C.G.A. § 16-10-20**, for that the said accused, in the County of Douglas and the State of Georgia, on or about June 1, 2022, did knowingly and willfully make a false statement, in a matter within the jurisdiction of the Georgia Bureau of Investigation, an agency of the State of Georgia, by stating in an interview with Special Agents Stephanie Thompson and Keisha Morris, agents of the Georgia Bureau of Investigation, that she did not sign a contract for janitorial services with S&A Express before the contract went through the Douglas County Board of Commissioners, when in fact she did, contrary to the laws of the State of Georgia, the good order, peace, and dignity thereof.



JOHN FOWLER
Deputy Attorney General



RICHMOND WRINKLE
Assistant Attorney General

CHRISTOPHER M. CARR
Attorney General