

INDICTMENT No. 2024RCCR 477

ARRAIGNMENT

RICHMOND B. WRINKLE
Assistant Attorney General

RICHMOND COUNTY SUPERIOR COURT

The Defendant:
DAWN NICHOLE GANTT
waives formal arraignment, copy of Bill of
indictment, list of witnesses sworn before the
Grand Jury, and pleads _____ guilty.

CHRISTOPHER M. CARR
Attorney General

In the matter of:

THE STATE OF GEORGIA

VS.

This _____ day of _____, 20____.

DAWN NICHOLE GANTT

Defendant

WITNESS FOR THE STATE:

Defendant's Attorney

LT. DAVE DEWEY
Augusta University Police Department

RACKETEERING, O.C.G.A. § 16-14-4(a)

JURY VERDICT

The Grand Jury for the March Term, 2024

We, the Jury, find the Defendant,
DAWN NICHOLE GANTT, as to:

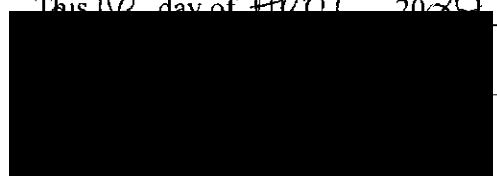
has found and does hereby return this

True Bill of Indictment.

Count 1: _____

This 16 day of April, 2024.

This _____ day of _____, 20____.



Foreperson

CLERK OF SUPERIOR, STATE
AND JUVENILE COURT
FILED FOR RECORD

2024 APR 16 PM 3:05

HATTIE HOLMES SULLIVAN
CLERK, RICHMOND CO., GA.

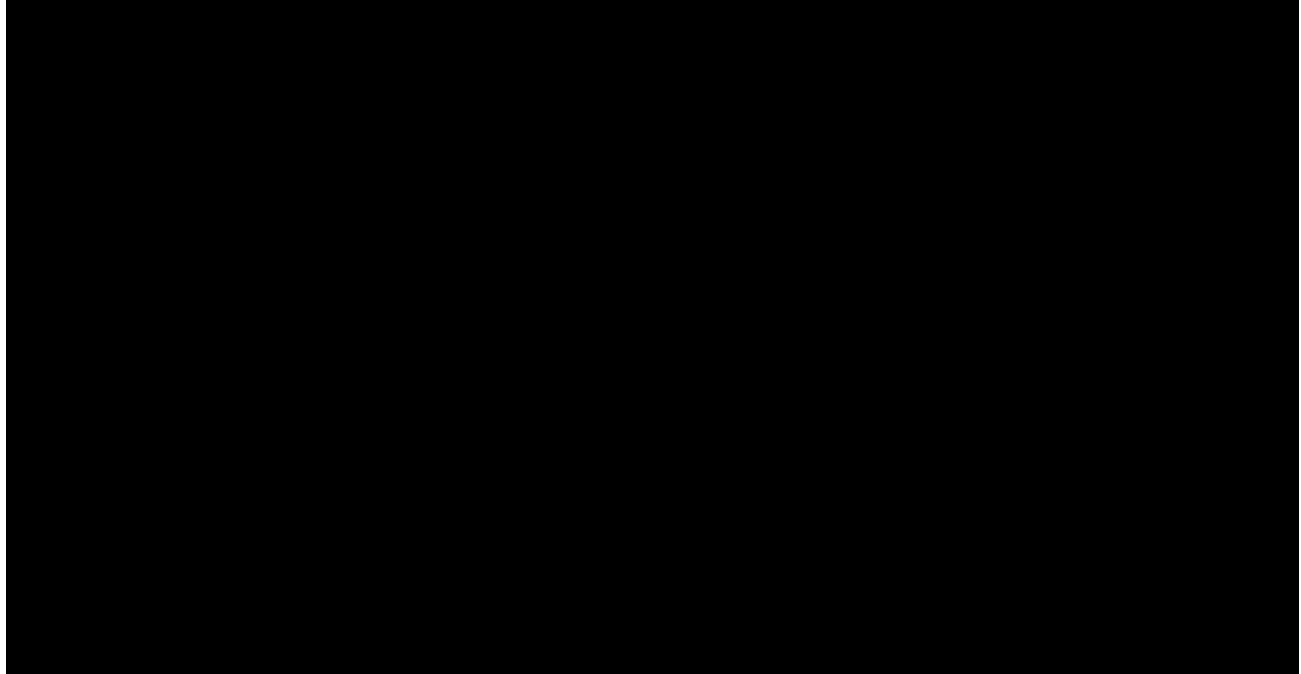
DANIEL J. CRAIG

OTN:

DIRECT INDICTMENT

**IN THE SUPERIOR COURT OF RICHMOND COUNTY
STATE OF GEORGIA**

THE GRAND JURORS, selected, chosen, and sworn for the County of Richmond, to-wit:



in the name and behalf of the citizens of Georgia, charge and accuse

DAWN NICHOLE GANTT

with the offense of **RACKETEERING**, in violation of **O.C.G.A. § 16-14-4(a)**, for that the said accused, in the County of Richmond and the State of Georgia, on and between February 16, 2016, and October 6, 2023, did unlawfully through a pattern of racketeering activity, acquire and maintain, directly and indirectly, an interest in and control of personal property, contrary to the laws of the State of Georgia, the good order, peace, and dignity thereof.

PART ONE – THE SCHEME

1.

Augusta University's Dental College of Georgia ("DCG") operates Augusta University Dental Associates, a nonprofit dental practice that receives payments from patients and insurance companies for dental services provided by DCG students, residents, and faculty.

2.

Approximately ten percent of the revenue derived from Augusta University Dental Associates is distributed to the Dean's Discretionary Fund, which is held in a Wells Fargo checking account ("the Account") ending in 6552. The purpose of the Dean's Discretionary Fund is to support DCG faculty, residents, staff, and student development by covering the cost of leadership programs, retreats, travel, annual events, and related expenditures.

3.

DCG hired Defendant Dawn Nichole Gantt in July 2015 to serve as the Dean's Office Coordinator.

4.

In her role, the Defendant maintained sole control over the Account and all transaction cards and checks associated with the Account.

5.

When the Account balance ran low, the Defendant prepared and submitted account replenishment request forms to DCG's Associate Dean of Business and Finance, who issued checks for the requested amount. The Defendant received and deposited those checks in the Account.

6.

The Defendant knew that she was not authorized to use the Account to complete personal transactions.

7.

During the period of time covered by this indictment, the Defendant engaged in a scheme to acquire and maintain an interest in and control of personal property by using the Account to complete unauthorized transactions for the personal benefit of herself and others.

8.

In furtherance of her scheme, the Defendant submitted written requests to replenish the Account, concealing the fact that she used a portion of the Account funds for the personal benefit of herself and others.

PART TWO – RACKETEERING ACTIVITY

9.

The Defendant committed at least two acts of racketeering activity in furtherance of one or more incidents, schemes, and transactions that had the same and similar intents, results, accomplices, victims, and methods of commission.

10.

Said racketeering activity includes:

- (A) **THEFT BY TAKING** in violation of **O.C.G.A. § 16-8-2** and constituting racketeering activity pursuant to **O.C.G.A. § 16-14-3(5)(A)(xii)**; and
- (B) **FALSE STATEMENTS AND WRITINGS** in violation of **O.C.G.A. § 16-10-20** and constituting racketeering activity pursuant to **O.C.G.A. § 16-14-3(5)(A)(xxii)**.

11.

At least one of the 307 acts of racketeering activity occurred in Richmond County, Georgia.

A. Acts of Racketeering Involving Theft by Taking (O.C.G.A. § 16-14-3(5)(A)(xii))

12.

On and between February 16, 2016, and October 6, 2023, the Defendant committed acts of **THEFT BY TAKING** in violation of **O.C.G.A. § 16-8-2** by unlawfully taking money, the property of DCG, with the intention of depriving DCG of said property. Said property is further described as funds the Defendant withdrew from the Account or otherwise used for the benefit of herself and others. Each transaction constitutes an act of racketeering activity as follows:

Act	On or About	Activity	Amount
1	February 16, 2016	Payment to Siriusxm.com	\$441.89
2	March 16, 2016	ATM Cash Withdrawal	\$300.00
3	May 31, 2016	ATM Cash Withdrawal	\$300.00
4	June 6, 2016	ATM Cash Withdrawal	\$120.00
5	June 14, 2016	ATM Cash Withdrawal	\$80.00
6	June 24, 2016	ATM Cash Withdrawal	\$100.00
7	July 13, 2016	ATM Cash Withdrawal	\$300.00
8	July 19, 2016	ATM Cash Withdrawal	\$300.00
9	July 21, 2016	ATM Cash Withdrawal	\$300.00
10	August 16, 2016	ATM Cash Withdrawal	\$300.00
11	August 22, 2016	ATM Cash Withdrawal	\$100.00
12	August 22, 2016	ATM Cash Withdrawal	\$200.00
13	September 16, 2016	ATM Cash Withdrawal	\$300.00
14	November 21, 2016	Payment to TCC Cards Direct	\$137.34
15	January 19, 2017	ATM Cash Withdrawal	\$300.00
16	June 19, 2017	ATM Cash Withdrawal	\$100.00
17	June 21, 2017	ATM Cash Withdrawal	\$32.81
18	June 22, 2017	ATM Cash Withdrawal	\$300.00
19	June 23, 2017	ATM Cash Withdrawal	\$300.00
20	July 11, 2017	Payment to Augusta University Health System	\$1,353.98

21	July 17, 2017	Payment to OBGYN Partners of Augusta	\$481.02
22	July 19, 2017	ATM Cash Withdrawal	\$300.00
23	July 21, 2017	ATM Cash Withdrawal	\$300.00
24	July 24, 2017	ATM Cash Withdrawal	\$300.00
25	August 15, 2017	ATM Cash Withdrawal	\$300.00
26	August 17, 2017	ATM Cash Withdrawal	\$300.00
27	August 21, 2017	ATM Cash Withdrawal	\$300.00
28	August 21, 2017	ATM Cash Withdrawal	\$300.00
29	September 15, 2017	ATM Cash Withdrawal	\$300.00
30	September 18, 2017	ATM Cash Withdrawal	\$300.00
31	October 13, 2017	ATM Cash Withdrawal	\$300.00
32	October 16, 2017	ATM Cash Withdrawal	\$300.00
33	October 16, 2017	ATM Cash Withdrawal	\$300.00
34	October 20, 2017	ATM Cash Withdrawal	\$300.00
35	October 23, 2017	ATM Cash Withdrawal	\$300.00
36	October 27, 2017	ATM Cash Withdrawal	\$300.00
37	November 17, 2017	ATM Cash Withdrawal	\$300.00
38	November 21, 2017	ATM Cash Withdrawal	\$300.00
39	November 27, 2017	ATM Cash Withdrawal	\$300.00
40	December 12, 2017	ATM Cash Withdrawal	\$300.00
41	December 18, 2017	Payment to TCC Cards Direct	\$158.04
42	December 20, 2017	ATM Cash Withdrawal	\$300.00
43	December 22, 2017	ATM Cash Withdrawal	\$300.00
44	January 17, 2018	ATM Cash Withdrawal	\$300.00
45	January 19, 2018	ATM Cash Withdrawal	\$300.00
46	January 22, 2018	ATM Cash Withdrawal	\$300.00
47	February 16, 2018	ATM Cash Withdrawal	\$300.00
48	February 20, 2018	ATM Cash Withdrawal	\$300.00
49	February 20, 2018	ATM Cash Withdrawal	\$300.00
50	April 23, 2018	ATM Cash Withdrawal	\$300.00
51	April 27, 2018	ATM Cash Withdrawal	\$300.00
52	May 14, 2018	ATM Cash Withdrawal	\$300.00
53	May 21, 2018	ATM Cash Withdrawal	\$300.00
54	May 23, 2018	ATM Cash Withdrawal	\$300.00
55	May 24, 2018	ATM Cash Withdrawal	\$300.00
56	June 22, 2018	ATM Cash Withdrawal	\$300.00
57	July 9, 2018	ATM Cash Withdrawal	\$300.00

58	July 10, 2018	ATM Cash Withdrawal	\$300.00
59	July 17, 2018	ATM Cash Withdrawal	\$300.00
60	July 20, 2018	ATM Cash Withdrawal	\$300.00
61	July 24, 2018	ATM Cash Withdrawal	\$300.00
62	August 13, 2018	ATM Cash Withdrawal	\$300.00
63	August 16, 2018	ATM Cash Withdrawal	\$300.00
64	August 17, 2018	ATM Cash Withdrawal	\$300.00
65	August 21, 2018	ATM Cash Withdrawal	\$300.00
66	August 22, 2018	ATM Cash Withdrawal	\$300.00
67	September 14, 2018	ATM Cash Withdrawal	\$300.00
68	September 17, 2018	Payment to Nissan of Augusta	\$323.50
69	September 18, 2018	ATM Cash Withdrawal	\$300.00
70	September 19, 2018	Payment to Nissan of Augusta	\$148.95
71	October 12, 2018	ATM Cash Withdrawal	\$300.00
72	October 16, 2018	ATM Cash Withdrawal	\$300.00
73	October 16, 2018	Payment to Synchrony Bank	\$1,283.97
74	October 19, 2018	ATM Cash Withdrawal	\$300.00
75	October 24, 2018	Payment to Verizon Wireless	\$1,382.39
76	November 9, 2018	ATM Cash Withdrawal	\$300.00
77	November 20, 2018	ATM Cash Withdrawal	\$300.00
78	December 24, 2018	ATM Cash Withdrawal	\$300.00
79	January 11, 2019	Payment to Verizon Wireless	\$322.70
80	January 14, 2019	ATM Cash Withdrawal	\$300.00
81	January 15, 2019	ATM Cash Withdrawal	\$300.00
82	January 15, 2019	Payment to Chase Bank	\$1,000.00
83	February 19, 2019	Payment to Chase Bank	\$1,200.00
84	March 13, 2019	ATM Cash Withdrawal	\$300.00
85	March 14, 2019	ATM Cash Withdrawal	\$300.00
86	March 18, 2019	Payment to The Carpet Warehouse	\$1,500.00
87	March 19, 2019	Payment to The Carpet Warehouse	\$1,500.00
88	March 25, 2019	Payment to The Carpet Warehouse	\$1,471.17
89	March 26, 2019	ATM Cash Withdrawal	\$300.00
90	April 4, 2019	ATM Cash Withdrawal	\$300.00
91	April 17, 2019	ATM Cash Withdrawal	\$300.00
92	April 26, 2019	ATM Cash Withdrawal	\$300.00
93	May 8, 2019	Payment to Magnolia Market Shop	\$226.55
94	May 10, 2019	Payment to Airbnb	\$963.26

95	May 16, 2019	Payment to Chase Bank	\$1,200.00
96	May 20, 2019	ATM Cash Withdrawal	\$300.00
97	May 24, 2019	ATM Cash Withdrawal	\$300.00
98	May 24, 2019	Payment to Chase Bank	\$1,450.00
99	June 3, 2019	Payment to Lowes	\$2,277.91
100	June 3, 2019	Payment to Chase Bank	\$5,037.81
101	June 4, 2019	ATM Cash Withdrawal	\$300.00
102	June 5, 2019	ATM Cash Withdrawal	\$300.00
103	June 7, 2019	ATM Cash Withdrawal	\$300.00
104	June 11, 2019	ATM Cash Withdrawal	\$300.00
105	August 12, 2019	Payment to Groupon Getaways	\$204.14
106	September 17, 2019	Payment to CCI Hotel Reservations	\$697.28
107	September 27, 2019	Payment to Nissan Auto Company	\$459.27
108	October 21, 2019	Payment to Augusta University Health System	\$2,500.00
109	October 29, 2019	Payment to Nissan Auto Company	\$459.27
110	November 6, 2019	Payment to Balsam Hill US	\$954.72
111	November 15, 2019	Payment to Chase Bank	\$600.00
112	November 21, 2019	Payment to TCC Cards Direct	\$838.64
113	November 26, 2019	Payment to Nissan Auto Company	\$459.27
114	December 27, 2019	Payment to Nissan Auto Company	\$459.27
115	January 17, 2020	Payment to Blue Air Condition	\$420.00
116	January 24, 2020	Payment to Blue Air Condition	\$230.00
117	January 28, 2020	Payment to Nissan Auto Company	\$459.27
118	February 12, 2020	Payment to Augusta University Health System	\$60.00
119	February 27, 2020	Payment to Nissan Auto Company	\$459.27
120	March 6, 2020	Payment to Chase Bank	\$7,085.60
121	March 6, 2020	Payment to Shop Your Way	\$10,822.67
122	March 16, 2020	Payment through PayPal	\$2,395.00
123	May 7, 2020	Payment to Verizon Wireless	\$1,371.59
124	May 14, 2020	Payment to Chase Bank	\$5,421.77
125	May 18, 2020	Payment to Synchrony Bank	\$818.63
126	May 18, 2020	Payment to Synchrony Bank	\$1,696.37
127	May 26, 2020	Payment to American Express	\$225.00
128	May 26, 2020	Payment to Synchrony Bank	\$2,817.50
129	June 4, 2020	Payment to Capital One	\$4,726.92
130	June 5, 2020	Payment to Chase Bank	\$90.05
131	June 5, 2020	Payment to Bank of America	\$895.71

132	June 8, 2020	Payment through PayPal	\$2,114.90
133	June 8, 2020	Payment to Amazon	\$3,143.06
134	June 8, 2020	Payment to Citibank	\$2,178.67
135	June 9, 2020	Payment to Comenity Bank	\$3,751.22
136	June 23, 2020	Payment to American Express	\$6,628.52
137	June 24, 2020	Payment to American Health Imaging of Augusta	\$473.08
138	September 22, 2020	Payment to Augusta University Health System	\$3,774.00
139	October 21, 2020	Payment to Kelley Appliance	\$1,122.22
140	November 2, 2020	Payment to TCC Cards Direct	\$711.78
141	January 4, 2021	Payment to Hidden Creek HOA	\$438.81
142	January 22, 2021	Payment to Future Motion Store	\$1,530.73
143	March 9, 2021	Payment to Comenity Bank	\$802.30
144	April 22, 2021	Transfer to SRP Federal Credit Union	\$0.39
145	April 22, 2021	Transfer to SRP Federal Credit Union	\$0.49
146	April 23, 2021	Transfer to SRP Federal Credit Union	\$1,830.92
147	April 23, 2021	Transfer to SRP Federal Credit Union	\$4,100.00
148	April 26, 2021	ATM Cash Withdrawal	\$26.91
149	April 27, 2021	ATM Cash Withdrawal	\$100.00
150	May 18, 2021	Payment to Southern Furniture Store	\$2,001.44
151	May 19, 2021	Payment to Southern Furniture Store	\$663.20
152	May 24, 2021	Payment to Recteq	\$498.92
153	May 24, 2021	Payment to Home Depot	\$247.29
154	May 25, 2021	Payment to VRBO	\$116.00
155	May 25, 2021	Payment to LSI Vacation Rentals	\$1,038.61
156	June 1, 2021	Payment to Veterans Heating Air	\$2,990.00
157	June 3, 2021	Payment to Nordictrack.com	\$1,968.84
158	June 7, 2021	Payment to Bank of America	\$131.78
159	June 7, 2021	Payment to Amazon	\$180.52
160	June 10, 2021	Payment to Verizon Wireless	\$413.05
161	June 29, 2021	Payment to Nordictrack.com	\$268.92
162	July 8, 2021	Payment to Citibank	\$930.83
163	August 9, 2021	Payment to Comenity Bank	\$239.62
164	August 20, 2021	Payment to Hairitage Studio	\$120.75
165	August 23, 2021	Payment to Optavia	\$829.40
166	September 28, 2021	Payment to Optavia	\$380.94
167	September 30, 2021	Payment to U.S. Roofing	\$1,035.00
168	October 13, 2021	Payment to Optavia	\$289.38

169	October 14, 2021	Payment to Augusta University Health System	\$1,316.60
170	October 20, 2021	Payment to Optavia	\$393.05
171	October 25, 2021	Payment to Optavia	\$124.18
172	October 25, 2021	Payment to Optavia	\$209.40
173	October 25, 2021	Payment to Mr. Appliance	\$589.61
174	November 18, 2021	Payment to TCC Cards Direct	\$642.66
175	November 19, 2021	Payment to Hyundai Motor Finance USA	\$601.80
176	November 24, 2021	Payment to Optavia	\$393.71
177	December 2, 2021	Payment to Cabela's	\$269.99
178	December 7, 2021	Payment to Marriott Evergreen	\$316.32
179	December 17, 2021	Payment to James C. Sherman, MD	\$125.00
180	December 20, 2021	Payment to Hyundai Motor Finance USA	\$601.80
181	December 23, 2021	Payment to Optavia	\$400.81
182	December 23, 2021	Payment to Dillard's	\$408.24
183	December 29, 2021	Payment to Dooney & Bourke	\$171.72
184	January 11, 2022	Payment to Hidden Creek HOA	\$438.81
185	January 11, 2022	Payment to Augusta University Health System	\$543.92
186	January 12, 2022	Payment to Citibank	\$1,154.46
187	January 19, 2022	Payment to Hyundai Motor Finance USA	\$601.80
188	January 21, 2022	Payment to Optavia	\$400.10
189	February 1, 2022	Payment to Citibank	\$1,042.59
190	February 8, 2022	Payment to Comenity Bank	\$681.13
191	February 16, 2022	Payment to Kendra Scott	\$1,944.00
192	February 16, 2022	Payment to Airbnb	\$2,998.86
193	February 22, 2022	Payment to Optavia	\$400.17
194	February 22, 2022	Payment to Hyundai Motor Finance USA	\$601.80
195	February 25, 2022	Payment to Academy Sports	\$468.00
196	March 2, 2022	Payment to Airbnb	\$420.59
197	March 11, 2022	Payment to Peloton Interactive	\$3,191.40
198	March 17, 2022	Payment to Peloton Interactive	\$39.00
199	March 21, 2022	Payment to Optavia	\$400.16
200	March 21, 2022	Payment to Hyundai Motor Finance USA	\$601.80
201	March 28, 2022	Payment to TD Bank	\$7,256.00
202	April 13, 2022	Payment to TD Bank	\$2,744.00
203	April 18, 2022	Payment to VRBO	\$2,250.47
204	April 18, 2022	Payment to Peloton Interactive	\$39.00
205	April 19, 2022	Payment to Hyundai Motor Finance USA	\$601.80

206	April 22, 2022	Payment to Optavia	\$376.76
207	May 2, 2022	Payment to Tonal	\$4,087.80
208	May 3, 2022	Payment to Comenity Bank	\$324.07
209	May 10, 2022	Payment to Hyundai Motor Finance USA	\$601.80
210	May 11, 2022	Payment to Louis Vuitton	\$3,672.00
211	May 16, 2022	Payment to Louis Vuitton	\$3,348.00
212	May 16, 2022	Payment to Louis Vuitton	\$1,209.60
213	May 16, 2022	Payment to Louis Vuitton	\$1,749.60
214	May 17, 2022	Payment to Peloton Interactive	\$39.00
215	May 18, 2022	Payment to Verizon Wireless	\$1,290.58
216	May 23, 2022	Payment to Optavia	\$380.92
217	June 8, 2022	Payment to VRBO	\$3,383.73
218	June 16, 2022	Payment to Hyundai Motor Finance USA	\$601.80
219	June 17, 2022	Payment to Peloton Interactive	\$44.00
220	July 11, 2022	Payment to Hyundai Motor Finance USA	\$601.80
221	July 18, 2022	Payment to Peloton Interactive	\$44.00
222	July 19, 2022	Payment to Optavia	\$380.50
223	July 25, 2022	Payment to Citibank	\$2,764.66
224	August 5, 2022	Payment to Launch Servicing	\$8,060.00
225	August 17, 2022	Payment to Peloton Interactive	\$44.00
226	August 17, 2022	Payment to Launch Servicing	\$4,120.00
227	August 18, 2022	Payment to Hyundai Motor Finance USA	\$601.80
228	August 19, 2022	Payment to Citibank	\$2,685.24
229	August 22, 2022	Payment to Optavia	\$355.33
230	August 22, 2022	Payment to Airbnb	\$268.40
231	August 22, 2022	Payment to Airbnb	\$229.66
232	August 29, 2022	Payment to Best Buy	\$183.59
233	August 29, 2022	Payment to Best Buy	\$2,409.98
234	August 31, 2022	Payment to Walmart	\$936.88
235	August 31, 2022	Payment to Airbnb	\$914.75
236	September 19, 2022	Payment to Peloton Interactive	\$44.00
237	September 19, 2022	Payment to Comenity Bank	\$2,536.71
238	September 19, 2022	Payment to Hyundai Motor Finance USA	\$601.80
239	October 4, 2022	Payment to Citibank	\$2,813.07
240	October 17, 2022	Payment to Optavia	\$357.84
241	October 17, 2022	Payment to Peloton Interactive	\$44.00
242	October 18, 2022	Payment to Hyundai Motor Finance USA	\$601.80

243	October 24, 2022	Payment to Citibank	\$2,362.52
244	October 26, 2022	Payment to Rawlings.com	\$323.95
245	October 28, 2022	Payment to TCC Cards Direct	\$1,316.55
246	February 2, 2023	Payment to Optavia	\$437.11
247	February 15, 2023	Payment to Patientpmt.com	\$1,760.09
248	February 21, 2023	Payment to Gold Cross EMS	\$618.25
249	February 21, 2023	Payment to Hotel Avalon	\$491.33
250	February 22, 2023	Payment to Airbnb	\$352.16
251	February 23, 2023	Payment to Airbnb	\$4,420.80
252	February 24, 2023	Payment to VRBO	\$1,865.60
253	March 6, 2023	Payment to Optavia	\$369.95
254	March 6, 2023	Payment to Comenity Bank	\$420.70
255	March 6, 2023	Payment to Citibank	\$2,526.57
256	March 31, 2023	Payment to Optavia	\$374.07
257	April 19, 2023	Payment to Hyundai Motor Finance USA	\$601.80
258	April 23, 2023	Payment to SRP Federal Credit Union	\$1,831.70
259	April 23, 2023	Payment to SRP Federal Credit Union	\$4,100.98
260	May 1, 2023	Payment to Optavia	\$373.65
261	May 8, 2023	Payment to Citibank	\$1,232.55
262	May 18, 2023	Payment to Hyundai Motor Finance USA	\$601.80
263	June 1, 2023	Payment to Optavia	\$373.69
264	June 20, 2023	Payment to Hyundai Motor Finance USA	\$601.80
265	June 22, 2023	Payment to OBGYN Partners of Augusta	\$920.52
266	June 28, 2023	Payment to VRBO	\$110.00
267	June 28, 2023	Payment to Evolve Vacation Rentals	\$267.30
268	July 7, 2023	Payment to Comenity Bank	\$855.13
269	July 10, 2023	Payment to Citibank	\$2,763.14
270	July 13, 2023	Payment to Hyundai Motor Finance USA	\$6,700.00
271	July 24, 2023	Payment to Evolve Vacation Rentals	\$623.70
272	August 16, 2023	Payment to Comenity Bank	\$230.87
273	August 18, 2023	Payment to Hyundai Motor Finance USA	\$2,050.00
274	August 25, 2023	Payment to Delta	\$1,631.00
275	August 25, 2023	Payment to Delta	\$1,631.00
276	August 25, 2023	Payment to Allianz Travel	\$220.18
277	August 25, 2023	Payment to Airbnb	\$2,482.86
278	September 5, 2023	Payment to Citibank	\$4,283.93
279	September 7, 2023	Payment to Comenity Bank	\$1,136.38

280	September 11, 2023	Payment to Delta	\$955.68
281	September 11, 2023	Payment to Delta	\$955.68
282	September 18, 2023	Payment to Verizon Wireless	\$1,549.79
283	September 19, 2023	Payment to Hyundai Motor Finance USA	\$6,450.00
284	September 21, 2023	Payment through PayPal	\$847.80
285	September 21, 2023	Payment through PayPal	\$3,294.00
286	September 22, 2023	Payment through PayPal	\$3,067.20
287	October 5, 2023	Payment to Comenity Bank	\$127.95
288	October 6, 2023	Payment to Citibank	\$4,660.60

B. Acts of Racketeering Involving False Statements and Writings (O.C.G.A. § 16-14-3(5)(A)(xxii))

13.

On and between December 8, 2017, and August 17, 2023, the Defendant committed acts of **FALSE STATEMENTS AND WRITINGS** in violation of **O.C.G.A. § 16-10-20** by knowingly and willfully concealing material facts, to wit: that a portion of the funds requested through account replenishment requests were for personal use, in a matter within the jurisdiction of DCG, a unit of the Board of Regents of the University System of Georgia, an agency of state government. Each submitted request constitutes an act of racketeering activity as follows:

Act	On or About	Activity
289	December 8, 2017	Account Replenishment Request for \$40,000
290	March 11, 2019	Account Replenishment Request for \$40,000
291	May 16, 2019	Account Replenishment Request for \$40,000
292	September 12, 2019	Account Replenishment Request for \$40,000
293	November 13, 2019	Account Replenishment Request for \$40,000
294	January 6, 2020	Account Replenishment Request for \$50,000
295	March 11, 2020	Account Replenishment Request for \$50,000
296	June 23, 2020	Account Replenishment Request for \$50,000
297	January 26, 2021	Account Replenishment Request for \$50,000
298	June 11, 2021	Account Replenishment Request for \$50,000
299	December 6, 2021	Account Replenishment Request for \$50,000
300	February 28, 2022	Account Replenishment Request for \$50,000

301	July 6, 2022	Account Replenishment Request for \$50,000
302	July 29, 2022	Account Replenishment Request for \$75,000
303	October 28, 2022	Account Replenishment Request for \$50,000
304	January 3, 2023	Account Replenishment Request for \$75,000
305	April 3, 2023	Account Replenishment Request for \$75,000
306	May 30, 2023	Account Replenishment Request for \$75,000
307	August 17, 2023	Account Replenishment Request for \$75,000

PART THREE – THE PROPERTY

14.

Through her pattern of racketeering activity, the Defendant did acquire and maintain approximately \$305,359.54 in personal property.

MARCH TERM, 2024



RICHMOND B. WRINKLE
Assistant Attorney General

CHRISTOPHER M. CARR
Attorney General