#### IN THE SUPERIOR COURT OF HALL COUNTY

#### NORTHEASTERN JUDICIAL CIRCUIT

#### STATE OF GEORGIA

INDICTMENT	GRAND JURY WITNESS
CASE NO. 2024CR73	Special Agent Derek Glasco Georgia Bureau of Investigation
STATE OF GEORGIA v.	
STEPHANIE DIANNE WOODARD   OFFENSES:   FALSE STATEMENTS AND WRITINGS, O.C.G.A.   § 16-10-20, Thirteen Counts (Counts 1, 2, 4, 6, 8, 10, 12, 14, 16, 19, 21, 22, and 24)   THEFT BY TAKING, O.C.G.A. § 16-8-2, Eleven Counts   (Counts 3, 5, 7, 9, 11, 13, 15, 17, 18, 20, and 23)	FILED 11ALL CO., GA 2024 JUN 18 PH 12: 20 CHARLES BAKER. CLERK SUPERIOR-STATE COURT
The Defendant herein waives formal arraignment/indictment by grand jury and pleads: GUILTY NOT GUILTY NOLO CONTENDRE This day of,	The Defendant herein waives formal arraignment/indictment by grand jury and pleads: GUILTY NOT GUILTY NOLO CONTENDRE This day of,
Defendant Attorney for Defendant	Defendant Attorney for Defendant
By: Assistant District Attorney	By: Assistant District Attorney

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#### BILL OF INDICTMENT

STATE OF GEORGIA, COUNTY OF HALL

IN THE SUPERIOR COURT OF SAID COUNTY

HALL CO., GA 2024 JUN 18 PM 12:20 THE GRAND JURORS SELECTED, CHOSEN AND SWORN FOR THE GOL



in the name and on behalf of the citizens of the State of Georgia, charge and accuse STEPHANIE DIANNE WOODARD with the offense of FALSE STATEMENTS AND WRITINGS, in violation of O.C.G.A. § 16-10-20, for that the said accused in the County of Hall and the State of Georgia, on or about the 30th day of July, 2018, did knowingly and willfully make a false writing, to wit: a "Continuing Legal Education Affidavit & Request for Credit," dated 7/30/18, knowing said document contained a false, fictitious, and fraudulent entry, to wit: that said accused attended every initialed session in its entirety and that it is a true and correct summary of the CLE Programming she attended, in a matter within the jurisdiction of the Prosecuting Attorneys' Council, a department of state government, contrary to the laws of said State, the good order, peace and dignity thereof.

Pursuant to O.C.G.A. § 17-3-2, the crime alleged does not fall outside of the limitations on prosecution because the crime was unknown until on or about October 27, 2022.

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse **STEPHANIE DIANNE WOODARD** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for that the said accused in the County of Hall and the State of Georgia, on or about the 3rd day of August, 2018, did knowingly and willfully make a false writing, to wit: a "Non State Paid Personnel Travel Reimbursement Form," dated 8/2/18, knowing said document contained a false, fictitious, and fraudulent entry, to wit: a certification that said accused incurred the described expenses and authorized use of mileage, in the discharge of her official duties, in a matter within the jurisdiction of the Prosecuting Attorneys' Council, a department of state government, contrary to the laws of said State, the good order, peace and dignity thereof.

Pursuant to O.C.G.A. § 17-3-2, the crime alleged does not fall outside of the limitations on prosecution because the crime was unknown until on or about October 27, 2022.

# COUNT 3

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of: Georgia, further charge and accuse **STEPHANIE DIANNE WOODARD** with the offense of **THEFT BY TAKING**, in violation of O.C.G.A. § 16-8-2, for that the said accused in the County of Hall and the State of Georgia, on the 22nd day of August, 2018, being an officer of the Prosecuting Attorneys' Council of the State of Georgia, a department of state government, did unlawfully and in breach of her duties as such officer take \$770.56, further described as the money transferred via check 59218, the property of the Prosecuting Attorneys' Council of the State of Georgia, with the intent to deprive said owner of said property, contrary to the laws of said State, the good order, peace and dignity thereof. Pursuant to O.C.G.A. § 17-3-2, the crime alleged does not fall outside of the limitations on prosecution because the crime was unknown until on or about October 27, 2022.

### COUNT 4

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse **STEPHANIE DIANNE WOODARD** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for that the said accused in the County of Hall and the State of Georgia, on or about the 16th day of August, 2019, did knowingly and willfully make a false writing, to wit: a "Travel Reimbursement Form," dated 8/16/19, knowing said document contained a false, fictitious, and fraudulent entry, to wit: a certification that said accused incurred the authorized use of mileage in the discharge of her official duties, in a matter within the jurisdiction of the Prosecuting Attorneys' Council, a department of state government, contrary to the laws of said State, the good order, peace and dignity thereof.

Pursuant to O.C.G.A. § 17-3-2, the crime alleged does not fall outside of the limitations on Secure on because the crime was unknown until on or about October 27, 2022.

## **COUNT 5**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of THEFT BY TAKING, in violation of O.C.G.A. § 16-8-2, for that the said accused in the County of Hall and the State of Georgia, on or about the 6th day of September, 2019, being an officer of the Prosecuting Attorneys' Council of the State of Georgia, a department of state government, did unlawfully and in breach of her duties as such officer take \$419.92, further described as the money transferred via check 60838, the property of the Prosecuting Attorneys' Council of the State of Georgia, with the intent to deprive said owner of said property,

contrary to the laws of said State, the good order, peace and dignity thereof.

Pursuant to O.C.G.A. § 17-3-2, the crime alleged does not fall outside of the limitations on because the crime was unknown until on or about October 27, 2022.

## **COUNT 6**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the<sup>i</sup> citizens of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of FALSE STATEMENTS AND WRITINGS, in violation of O.C.G.A. § 16-10-20, for that the said accused in the County of Hall and the State of Georgia, on or about the 4th day of October, 2019, did knowingly and willfully make a false writing, to wit: a "Hall County Travel Expense Request Form," signed on 10/4/19, knowing said document contained a false, fictitious, and fraudulent statement, to wit: an attestation and certification by the Defendant that the claimed reimbursement was accurate and incurred by her, in a matter within the jurisdiction of the government of Hall County, Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

Pursuant to O.C.G.A. § 17-3-2, the crime alleged does not fall outside of the limitations on prosecution because the crime was unknown until on or about October 27, 2022.

## COUNT 7

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse **STEPHANIE DIANNE WOODARD** with the offense of **THEFT BY TAKING**, in violation of O.C.G.A. § 16-8-2, for that the said accused in the County of Hall and the State of Georgia, on or about the 16th day of October, 2019, being an officer and employee of the government of Hall County, Georgia, did unlawfully and in breach of her duties as such officer and employee, take \$498.80, further described as the funds transferred via check 287348, the property of Hall County, with the intent to deprive said

owner of said property, contrary to the laws of said State, the good order, peace and dignity thereof.

Pursuant to O.C.G.A. § 17-3-2, the crime alleged does not fall outside of the limitations on prosecution because the crime was unknown until on or about October 27, 2022.

### COUNT 8

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of FALSE STATEMENTS AND WRITINGS, in violation of O.C.G.A. § 16-10-20, for that the said accused in the County of Hall and the State of Georgia, on or about the 4th day of August, 2021, did knowingly and willfully conceal a material fact, to wit: that said accused had previously requested a reimbursement from the Prosecuting Attorneys' Council of the State of Georgia, in a "Hall County Travel Expense Request Form," signed on 8/4/2021, in a matter within the jurisdiction of the government of Hall County, Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

# COUNT 9

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of THEFT BY TAKING, in violation of O.C.G.A. § 16-8-2, for that the said accused in the County of Hall and the State of Georgia, on or about the 16th day of August, 2021, being an officer and employee of the government of Hall County, Georgia, did unlawfully and in breach of her duties as such officer and employee, take \$294.00, further described as the funds transferred via check 312240, the property of Hall County, with the intent to deprive said owner of said property, contrary to the laws of said State, the good order, peace and dignity thereof.

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of FALSE STATEMENTS AND WRITINGS, in violation of O.C.G.A. § 16-10-20, for that the said accused in the County of Hall and the State of Georgia, on or about the 7th day of August, 2022, did knowingly and willfully conceal a material fact, to wit: that said accused had previously requested a reimbursement from the Prosecuting Attorneys' Council of the State of Georgia, in a "Hall County Travel Expense Request Form," signed on 8/1/2022, in a matter within the jurisdiction of the government of Hall County, Georgia, contrary to the laws of said State, the good order, peace and dignity thereof. JUN 18 PH 12:

## **COUNT 11**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizents of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of THEFT BY TAKING, in violation of O.C.G.A. § 16-8-2, for that the said accused in the County of Hall and the State of Georgia, on or about the 16th day of August, 2022, being an officer and employee of the government of Hall County, Georgia, did unlawfully and in breach of her duties as such officer and employee, take \$236.00, further described as the funds transferred via check 329581, the property of Hall County, with the intent to deprive said owner of said property, contrary to the laws of said State, the good order, peace and dignity thereof.

#### **COUNT 12**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of FALSE STATEMENTS AND WRITINGS, in violation of O.C.G.A. § 16-10-20, for that the said accused in the County of Hall and the State of Georgia, on or about the 9th day of July, 2021, did knowingly and willfully Christopher M. Carr, District Attorney Pro Tempore Page 7

make a false statement, to wit: that a reimbursement request for \$190.00 was for "1 dog cremation for old mag court Def never paid," in a matter within the jurisdiction of the government of Hall County, Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

### **COUNT 13**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citized of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of THEFT BY TAKING, in violation of O.C.G.A. § 16-8-2, for that the said accused in the County of Hall and the State of Georgia, on or about the 23rd day of July, 2021, being an officer and employee of the government of Hall County, Georgia, did unlawfully and in breach of her duties as such officer and employee, take \$190.00, further described as funds transferred via check 311011, the property of Hall County, with the intent to deprive said owner of said property, contrary to the laws of said State, the good order, peace and dignity thereof.

## **COUNT 14**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse **STEPHANIE DIANNE WOODARD** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for that the said accused in the County of Hall and the State of Georgia, on or about the 3rd day of March, 2022, did knowingly and willfully make a false statement, to wit: that a reimbursement request for \$17.35 for a purchase at a Dollar Tree in Boone, North Carolina was for office supplies, in a matter within the jurisdiction of the government of Hall County, Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse **STEPHANIE DIANNE WOODARD** with the offense of **THEFT BY TAKING**, in violation of O.C.G.A. § 16-8-2, for that the said accused in the County of Hall and the State of Georgia, on or about the 22nd day of July, 2022, being an officer and employee of the government of Hall County, Georgia, did unlawfully and in breach of her duties as such officer and employee, take \$17.35, further described as funds transferred via check 328421, the property of Hall County, with the intent to deprive said owner of said property, contrary to the laws of said State, the good order, peace and dignity **Exercise** 

# COUNT 16

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citized of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of FALSE STATEMENTS AND WRITINGS, in violation of O.C.G.A. § 16-10-20, for that the said accused in the County of Hall and the State of Georgia, on or about the 23rd day of June, 2022, did knowingly and willfully make a false statement, to wit: that a receipt from First Watch was an expense for Abuse Awareness, in a matter within the jurisdiction of the government of Hall County, Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 17

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse **STEPHANIE DIANNE WOODARD** with the offense of **THEFT BY TAKING**, in violation of O.C.G.A. § 16-8-2, for that the said accused in the County of Hall and the State of Georgia, on or about the 18th day of July, 2022, being an officer and employee of the government of Hall County, Georgia, did unlawfully and in breach of her duties as such officer and employee, take \$68.92, further

described as a portion of the funds transferred via check 327953, the property of Hall County, with the intent to deprive said owner of said property, contrary to the laws of said State, the good order, peace and dignity HALL CO., GA 2024 JUN 18 PH 12: thereof.

## **COUNT 18**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of THEFT BY TAKING, in violation of O.C.G.A. § 16-8-2, for that the said accused in the County of Hall and the State of Georgia, on or about the 30th day of June, 2022, being an officer and employee of the government of Hall County, Georgia, did unlawfully and in breach of her duties as such officer and employee, take \$1,430.00, the property of Hall County and further described as funds paid to "Testing Services" from her Hall County Government Procurement Card, with the intent to deprive said owner of said property, contrary to the laws of said State, the good order, peace and dignity thereof.

## **COUNT 19**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of FALSE STATEMENTS AND WRITINGS, in violation of O.C.G.A. § 16-10-20, for that the said accused in the County of Hall and the State of Georgia, on or about the 5th day of July, 2022, did knowingly and willfully use a false writing, to wit: a Kaplan Test Prep Receipt, knowing said document contained a false, fictitious, and fraudulent statement, to wit: that the registration was for for an SAT course, in a matter within the jurisdiction of the government of Hall County, Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of THEFT BY TAKING, in violation of O.C.G.A. § 16-8-2, for that the said accused in the County of Hall and the State of Georgia, on or about the 23rd day of August, 2022, being an officer and employee of the government of Hall County, Georgia, did unlawfully and in breach of her duties as such officer and employee, take \$215.00, the property of Hall County and further described as funds paid to "LSA LAW SCHOOL ADMSSN" from her Hall County Government Procurement Card, with the intent to deprive said owner of said property, contrary to the laws of said State, the good order, peace and dignity thereof.

# COUNT 21

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the icitizens of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of FALSE STATEMENTS AND WRITINGS, in violation of O.C.G.A. § 16-10-20, for that the said accused in the County of Hall and the State of Georgia, on or about the 23rd day of August, 2022, did knowingly and willfully make a false writing, to wit: a Law School Admission Council Receipt, knowing said document contained a false, fictitious, and fraudulent statement, to wit: that the registration was for **Example 1**, in a matter within the jurisdiction of the government of Hall County, Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

#### **COUNT 22**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of FALSE ' STATEMENTS AND WRITINGS, in violation of O.C.G.A. § 16-10-20, for that the said accused in the County of Hall and the State of Georgia, on or about the 26th day of August, 2022, did knowingly and willfully make a false statement, to wit: that a receipt from the Law School Admission Council was for a victim in Project Yet, in a matter within the jurisdiction of the government of Hall County, Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

### **COUNT 23**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of THEFT BY TAKING, in violation of O.C.G.A. § 16-8-2, for that the said accused in the County of Hall and the State of Georgia, on or about the 11th day of September, 2022, being an officer and employee of the government of Hall County, Georgia, did unlawfully and in breach of her duties as such officer and employee, take \$54.06, the property of Hall County and further described as funds paid to "TARGET.COM" from her Hall County Government Procurement Card, with the intent to deprive said owner of said property, contrary to the laws of said State, the good order, peace and dignity thereof. 124 JUN 18 PH

### **COUNT 24**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of the State of Georgia, further charge and accuse STEPHANIE DIANNE WOODARD with the offense of FALSE STATEMENTS AND WRITINGS, in violation of O.C.G.A. 16-10-20, for that the said accused in the County of Hall and the State of Georgia, on or about the 19th day of September, 2022, did knowingly and willfully use a false writing, to wit: a note on a receipt from Target.com for a pillow and pillow case was for a victim, in a matter within the jurisdiction of the government of Hall County, Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.