

11-27-12

THE STATE OF TENNESSEE

SUMMONS WITNESSES FOR THE STATE

VS.



MORGAN LEANN MARTINEZ

1. FORGERY

T.C.A. §39-14-114(a)

2. THEFT OF PROPERTY > \$2,500.00

T.C.A. §39-14-103(a)

3-6. THEFT OF PROPERTY < \$1,000.00

T.C.A. §39-14-103(a)

7. THEFT OF PROPERTY > \$1,000.00

T.C.A. §39-14-103(a)

PROSECUTOR(S)



BY ORDER OF

*Matthew F. Stowe*

MATTHEW F. STOWE

DISTRICT ATTORNEY GENERAL

A TRUE BILL / NO TRUE BILL

WITNESSES

*Willie Ann Lee*  
FOREMAN OF THE GRAND JURY  
BENTON COUNTY, TENNESSEE

WERE SWORN BY THE FOREMAN OF THE GRAND JURY TO TESTIFY BEFORE THE GRAND JURY ON THIS INDICTMENT THIS THE 21ST DAY OF OCTOBER, 2019.

*Issue Capias  
\$10,000.00 Bond*

*Willie Ann Lee*  
FOREMAN OF THE GRAND JURY  
BENTON COUNTY, TENNESSEE

MARTINEZ 1-7.DOC  
REVERSE.DOC

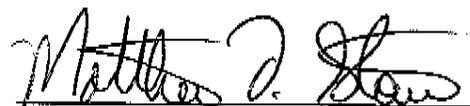
**STATE OF TENNESSEE, BENTON COUNTY  
CIRCUIT COURT, OCTOBER, 2019 TERM**

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**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 BENTON, in the State aforesaid, upon their oath present:

That MORGAN LEANN MARTINEZ, heretofore, to-wit: On or about OCTOBER 31, 2018, before the finding of this indictment, in the County and State aforesaid, then and there did intentionally or knowingly and with intent to defraud THE TOWN OF BIG SANDY, TENNESSEE, of a sum of THREE THOUSAND SIX HUNDRED (\$3,600.00) DOLLARS pass, forge or make without the authorization of MAYOR RON LANE, a certain paper writing consisting of a check purportedly drawn on the account of THE TOWN OF BIG SANDY, TENNESSEE FROM THE BANK OF CAMDEN, so that the said paper writing purported to bear the signature of the said MAYOR RON LANE, as Drawer/Endorser, thereby committing the offense of FORGERY, in violation of T.C.A. §39-14-114(a), against the peace and dignity of the State of Tennessee.



MATTHEW F. STOWE  
DISTRICT ATTORNEY GENERAL

MARTINEZ 1.DOC  
§39-14-114(a)

**STATE OF TENNESSEE, BENTON COUNTY  
CIRCUIT COURT, OCTOBER, 2019 TERM**

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**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 BENTON, in the State aforesaid, upon their oath present:

That MORGAN LEANN MARTINEZ, heretofore, to-wit: On or about OCTOBER 31, 2018, before the finding of this indictment, in the County and State aforesaid, did knowingly or intentionally obtain or exercise control over AN UNAUTHORIZED CHECK, to wit: A THREE THOUSAND SIX HUNDRED (\$3,600.00) CHECK, THE VALUE BEING OVER TWO THOUSAND FIVE HUNDRED (\$2,500.00) DOLLARS BUT LESS THAN TEN THOUSAND (\$10,000.00) DOLLARS, without the effective consent of the MAYOR RON LANE, stating that the mayor had authorized her to pre-pay herself for time that she was allegedly going to be working from home or coming in periodically during her maternity leave but with the intent to deprive the said TOWN OF BIG SANDY, 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  
DISTRICT ATTORNEY GENERAL

MARTINEZ 2.DOC  
§39-14-103(a)

**STATE OF TENNESSEE, BENTON COUNTY  
CIRCUIT COURT, OCTOBER, 2019 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 BENTON, in the State aforesaid, upon their oath present:

That MORGAN LEANN MARTINEZ, heretofore, to-wit: On or about FEBRUARY 22, 2019, before the finding of this indictment, in the County and State aforesaid, did knowingly or intentionally obtain or exercise control over property, to-wit: A CHECK IN THE AMOUNT OF FOUR HUNDRED TWELVE AND 80/100 (\$412.80) DOLLARS, of the value of LESS THAN ONE THOUSAND AND NO/100 (\$1,000.00) DOLLARS, being the property of THE TOWN OF BIG SANDY, TENNESSEE, without the owner's effective consent, with the intent to deprive the said TOWN OF BIG SANDY, 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  
DISTRICT ATTORNEY GENERAL

MARTINEZ 3.DOC  
§39-14-103(a)

**STATE OF TENNESSEE, BENTON COUNTY  
CIRCUIT COURT, OCTOBER, 2019 TERM**

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**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 BENTON, in the State aforesaid, upon their oath present:

That MORGAN LEANN MARTINEZ, heretofore, to-wit: On or about FEBRUARY 6, 2019, before the finding of this indictment, in the County and State aforesaid, did knowingly or intentionally obtain or exercise control over property, to-wit: A CREDIT CARD BELONGING TO THE TOWN OF BIG SANDY, TO PURCHASE AN UNAUTHORIZED KEYBOARD AND A IPAD FOR HER OWN PERSONAL USE, COSTING THREE HUNDRED SEVENTY SEVEN DOLLARS AND 24/100, THE VALUE OF LESS THAN ONE THOUSAND AND NO/100 (\$1,000.00) DOLLARS, being the property of THE TOWN OF BIG SANDY, TENNESSEE, without the owner's effective consent, with the intent to deprive the said TOWN OF BIG SANDY, 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  
DISTRICT ATTORNEY GENERAL

MARTINEZ 4.DOC  
§39-14-103(a)

**STATE OF TENNESSEE, BENTON COUNTY  
CIRCUIT COURT, OCTOBER, 2019 TERM**

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**COUNT FIVE:**

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 BENTON, in the State aforesaid, upon their oath present:

That MORGAN LEANN MARTINEZ, heretofore, to-wit: On or about MARCH 1, 2019, before the finding of this indictment, in the County and State aforesaid, did knowingly or intentionally obtain or exercise control over property, to-wit: A PAYMENT/CHECK, IN THE AMOUNT OF ONE HUNDRED THIRTY SEVEN AND 20/100 (\$137.20) DOLLARS, of the value of LESS THAN ONE THOUSAND AND NO/100 (\$1,000.00) DOLLARS, USED AS A RE-IMBURSEMENT FOR EXPENSES ASSOCIATED WITH ATTENDING AN MTAS CLASS REQUIRED FOR HER JOB DUTIES. Upon checking with MTAS officials, she never attended the class and was marked as a NO SHOW at the class, with the intent to deprive the said TOWN OF BIG SANDY, 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  
DISTRICT ATTORNEY GENERAL

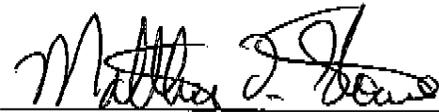
MARTINEZ 5.DOC  
§39-14-103(a)

**STATE OF TENNESSEE, BENTON COUNTY  
CIRCUIT COURT, OCTOBER, 2019 TERM**

**COUNT SIX:**

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 BENTON, in the State aforesaid, upon their oath present:

That MORGAN LEANN MARTINEZ, heretofore, to-wit: On or about MARCH 8, 2019, before the finding of this indictment, in the County and State aforesaid, did knowingly or intentionally obtain or exercise control over property, to-wit: A PAYMENT/CHECK, IN THE AMOUNT OF TWO HUNDRED THIRTY THREE AND 60/100 (\$233.60) DOLLARS, of the value of LESS THAN ONE THOUSAND AND NO/100 (\$1,000.00) DOLLARS, USED TO PAY HERSELF OVERTIME SHE DIDN'T WORK, with the intent to deprive the said TOWN OF BIG SANDY, 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  
DISTRICT ATTORNEY GENERAL

MARTINEZ 6.DOC  
§39-14-103(a)

**STATE OF TENNESSEE, BENTON COUNTY  
CIRCUIT COURT, OCTOBER, 2019 TERM**

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**COUNT SEVEN:**

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 BENTON, in the State aforesaid, upon their oath present:

That MORGAN LEANN MARTINEZ, heretofore, to-wit: On or about NOV. 11, 2018, THRU JANUARY, 2019, before the finding of this indictment, in the County and State aforesaid, did knowingly or intentionally obtain or exercise control over a check, to wit: WAGES IN A CHECK IN THE AMOUNT OF ONE THOUSAND TWO HUNDRED FIFTY (\$1,250.00) DOLLARS EVEN THOUGH SHE WAS OFF ON MATERNITY LEAVE AND HAD ALREADY PAID HERSELF FOR THAT LEAVE. In essence, she was double-dipping and paying herself twice for part of the same time period..NONE OF THIS WAS AUTHORIZED, THE VALUE BEING OVER ONE THOUSAND (\$1,000.00) DOLLARS without the effective consent of the owner, TOWN OF BIG SANDY, TENNESSEE, and with the intent to deprive the said owner thereof, thereby committing the property of without the owner's effective consent, with the intent to deprive, 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  
DISTRICT ATTORNEY GENERAL