CASE NO. 94002 TCA 39-11-715 STATE OF TENNESSEE VS. DON HONG	Plea 1/30/25 FILE MAY 0 5 202 PROSECUTOR DEPUTY WITNESSES
THEFT OF PROPERTY - \$60,000 - \$250,000 (F - B) CRIMINAL SIMULATION - \$60,000 - \$250,000 (F - B) FORGERY - \$60,000 OR MORE (F - B) THEFT OF PROPERTY - \$2,500 TO < \$10,000 (F - D) RETALIATE FOR PAST ACTION (F - E) OFFICIAL MISCONDUCT (F - E) OFFICIAL OPPRESSION (F - E)	Here duly summoned as witnesses and sworn by me, and testified before the Grand Jury on this indictment GRAND JURY FOREMAN THE CLERK will issue summons for the following State Witnesses:
A TRUE BILL	
GRAND JURY FOREMAN	JENNINGS H. JONES DISTRICT ATTORNEY GENERAL
STATE OF TENNESSEE, RUTHERFORD COUNTY MAY SESSION OF THE CRIMINAL COURT, 2025	

THE GRAND JURORS of Rutherford County, Tennessee, duly empanelled and sworn upon their oath present that in Rutherford County, Tennessee, and before the finding of this indictment, on the between the 1st day of January, 2017 and 1st day of May, 2025

DON HONG

did unlawfully and knowingly obtain or exercise control over the property of others, the said property including but not limited to MONIES and being of the value of \$60,000- \$250,000 with the intent to deprive the true owner thereof, and without the owner's effective consent, in violation of T.C.A. 39-14-103

COUNT TWO

STATE OF TENNESSEE, RUTHERFORD COUNTY

MAY SESSION OF THE CRIMINAL COURT, 2025

THE GRAND JURORS of Rutherford County, Tennessee, duly empanelled and sworn upon their oath present that in Rutherford County, Tennessee, and before the finding of this indictment, on the between the 1st day of January, 2017 and 1st day of May, 2025

DON HONG

did unlawfully and with intent to defraud or harm another, make or alter an object, in whole or in part, so that it appears to have value because of age, antiquity, rarity, source or authorship that it does not have, or possess an object so made or altered with the intent to sell, pass, or otherwise utter it, the value of being OVER \$60,000, in violation of T.C.A. 39-14-115

COUNT THREE

STATE OF TENNESSEE, RUTHERFORD COUNTY

MAY SESSION OF THE CRIMINAL COURT, 2025

THE GRAND JURORS of Rutherford County, Tennessee, duly empanelled and sworn upon their oath present that in Rutherford County, Tennessee, and before the finding of this indictment, on the between the 1st day of January, 2017 and 1st day of May, 2025

DON HONG

did unlawfully and knowing forge a writing with intent to defraud or harm another, the value being OVER \$60,0000, in violation of T.C.A. 39-14-114(a)

COUNT FOUR

STATE OF TENNESSEE, RUTHERFORD COUNTY

MAY SESSION OF THE CRIMINAL COURT, 2025

THE GRAND JURORS of Rutherford County, Tennessee, duly empanelled and sworn upon their oath present that in Rutherford County, Tennessee, and before the finding of this indictment, on the between the 1st day of January, 2020 and 1st day of May, 2025

DON HONG

did unlawfully and knowingly obtain or exercise control over the property of others, the said property including but not limited to MONIES and being of the value of \$2,500-\$10,000 with the intent to deprive the true owner thereof, and without the owner's effective consent, in violation of T.C.A. 39-14-103

COUNT FIVE

STATE OF TENNESSEE, RUTHERFORD COUNTY

MAY SESSION OF THE CRIMINAL COURT, 2025

THE GRAND JURORS of Rutherford County, Tennessee, duly empanelled and sworn upon their oath present that in Rutherford County, Tennessee, and before the finding of this indictment, on the between the 1st day of August, 2024 and 1st day of May, 2025

DON HONG

did unlawfully harm or threaten to harm a witness at an official proceeding, judge, district attorney general, an assistant district attorney general or a law enforcement officer, clerk, employee of the clerk, juror or former juror, or a family member of any such person, by any unlawful act in retaliation for anything the witness, judge, district attorney general, assistant district attorney general, employee of the district attorney general or a law enforcement officer, clerk, employee of the clerk, or juror did in an official capacity as witness, judge, district attorney general, assistant district attorney general, employee of the district attorney general or a law enforcement officer, clerk, employee of the clerk, or juror in violation of T.C.A. 39-16-510

COUNT SIX

STATE OF TENNESSEE, RUTHERFORD COUNTY

MAY SESSION OF THE CRIMINAL COURT, 2025

THE GRAND JURORS of Rutherford County, Tennessee, duly empanelled and sworn upon their oath present that in Rutherford County, Tennessee, and before the finding of this indictment, on the between the 1st day of January, 2017 and 1st day of May, 2025

DON HONG

did unlawfully and knowingly, while being a public servant, to wit: EMPLOYEE AT A PUBLIC SCHOOL INSTITUTION, intentionally or knowingly with intent to obtain a benefit did commit an act relating to the servant's office or employment that constitutes an unauthorized exercise of official power or exceeds the servant's official power or refrains from performing a duty that is imposed by law or that is clearly inherent in the nature of the public servant's office or employment, in violation of T.C.A. §39-16-402

COUNT SEVEN

STATE OF TENNESSEE, RUTHERFORD COUNTY

MAY SESSION OF THE CRIMINAL COURT, 2025

THE GRAND JURORS of Rutherford County, Tennessee, duly empanelled and sworn upon their oath present that in Rutherford County, Tennessee, and before the finding of this indictment, on the between the 1st day of January, 2017 and 1st day of May, 2025

DON HONG

commit the offense of official oppression by intentionally subjecting another to mistreatment or to arrest, detention, stop, frisk, halt, search, seizure, dispossession, assessment, or lien and DONG HONG knew the conduct was unlawful; in violation of TCA 39-16-403

DISTRICT ATTMENEY

EY GENERAL