

WITNESSES:

(In addition to those listed in the body of the Indictment)

Captain John Cagle
CID Commander
Pickens County Sheriff's Office
2985 Camp Road
Jasper, GA 30143

GENERAL BILL OF INDICTMENT

No. 2022 SUCR0163

Pickens Superior Court

MARCH TERM 2022

The State of Georgia

DEFENDANT ADDRESSES:

Carlton Keith Wilson
41 Arbor Hill Trace
Talking Rock, Georgia 30175

Cynthia Hester Wilson
41 Arbor Hill Trace
Talking Rock, Georgia 30175

vs.

**CARLTON KEITH WILSON
CYNTHIA HESTER WILSON**

Filed in office by:

William Cantrell

June 28th

Grand Jury Bailiff
20 22

Jennifer L. Jordan
True

Clerk, S. C.

BILL

Christopher M. Carr

Foreman

CHRISTOPHER M. CARR, Attorney General

SPECIAL PRESENTMENT

_____, Prosecutor

Minutes _____ Page _____

The Defendant, **Carlton Keith Wilson**, hereby waives formal arraignment and demands a copy of the Bill of Indictment and list of witnesses and hereby pleads

NOT guilty.

This 28 day of June, 2022.

Carlton Wilson
Defendant

[Signature]
Attorney for Defendant

The Defendant, **Cynthia Hester Wilson**, hereby waives formal arraignment and demands a copy of the Bill of Indictment and list of witnesses and hereby pleads

NOT guilty.

This 28 day of June, 2022.

Cynthia Wilson
Defendant

[Signature]
Attorney for Defendant

GEORGIA, PICKENS COUNTY

IN THE SUPERIOR COURT OF PICKENS COUNTY

The Grand Jurors selected, chosen and sworn for the County of Pickens to wit:

- | | |
|------------------------------------|---------------------------------|
| 1. DAWN CARVER, FOREPERSON | |
| 2. KIMBERLY MASON, ASSISTANT FP | |
| 3. APRIL COLE, CLERK | 13. LARRY KING |
| 4. KENNETH DUNSON, ASSISTANT CLERK | 14. WILLIAM MCCOLLUM |
| 5. DANIEL CAYLOR, DOORGUARD | 15. PAULA FENDLEY |
| 6. CURTIS TERRY | 16. BYRON DURBIN |
| 7. JADE RIDDLE | 17. SCOTTIE TOWNSEND |
| 8. TERRI BARTON | 18. JOHN THORNTON |
| 9. ELISABETH SHELTON | 19. CONSTANCE BURNS |
| 10. KERRY FAIRBANKS | 20. BRITTANY NICHOLS |
| 11. TYRA MULLINAX | 21. SYDNEY ROMINE |
| 12. DEBRA DOBBS | |

COUNT 1 - RACKETEERING

in the name and behalf of the citizens of Georgia, charge and accuse **CARLTON KEITH WILSON and CYNTHIA HESTER WILSON** (hereafter referred to collectively as **“THE ACCUSED”** in Count 1), individually and as parties to a crime, with the offense of **RACKETEERING**, in violation of **O.C.G.A. § 16-14-4**, for that **THE ACCUSED**, in the County of Pickens and the State of Georgia, between March 29, 2017 and February 22, 2022, did endeavor to acquire and maintain, directly and indirectly, an interest in and control of money, through a pattern of racketeering activity by engaging in at least two acts of racketeering activity in furtherance of at least one incident with similar intent, contrary to the laws of said State, the good order, peace, and dignity thereof. The racketeering acts as alleged as follows:

- (1) On or about the 29th day of March, 2017, the accused committed the offense of Theft by Conversion in violation of O.C.G.A. § 16-8-4 by having lawfully obtained funds, the property of Brenda Weaver and George Weaver with a value greater than \$25,000, under an agreement to make the specified disposition that said property be used for the operation of the Appalachian Gun Range, did knowingly convert said funds to their own use in violation of the agreement.

- (2) On or about the 2nd day of February, 2018, the accused committed the offense of Theft by Taking in violation of O.C.G.A. § 16-8-2 by unlawfully taking property of Appalachian Gun Range, to wit: \$20,379.84, with the intent of depriving Appalachian Gun Range of said money.
- (3) On or about the 22nd day of March, 2018, the accused committed the offense of Theft by Taking in violation of O.C.G.A. § 16-8-2 by unlawfully taking property of Appalachian Gun Range, to wit: \$1647.75, with the intent of depriving Appalachian Gun Range of said money.
- (4) On or about the 23rd day of March, 2018, the accused committed the offense of Theft by Taking in violation of O.C.G.A. § 16-8-2 by unlawfully taking property of Appalachian Gun Range, to wit: \$6253.70, with the intent of depriving Appalachian Gun Range of said money.
- (5) On or about the 28th day of March, 2018, the accused committed the offense of Theft by Taking in violation of O.C.G.A. § 16-8-2 by unlawfully taking property of Appalachian Gun Range, to wit: \$2716.88, with the intent of depriving Appalachian Gun Range of said money.
- (6) On or about the 2nd day of June, 2018, the accused committed the offense of Theft by Taking in violation of O.C.G.A. § 16-8-2 by unlawfully taking property of Appalachian Gun Range, to wit: \$2719.46, with the intent of depriving Appalachian Gun Range of said money.
- (7) On or about the 26th day of January, 2019, the accused committed the offense of Theft by Taking in violation of O.C.G.A. § 16-8-2 by unlawfully taking property of Appalachian Gun Range, to wit: \$2,199.07, with the intent of depriving Appalachian Gun Range of said money.
- (8) On or about the 15th day of April, 2020, the accused committed the offense of Theft by Taking in violation of O.C.G.A. § 16-8-2 by unlawfully taking property of Appalachian Gun Range, to wit: \$1329.23, with the intent of depriving Appalachian Gun Range of said money.

- (9) On or about the 10th day of September, 2020, the accused committed the offense of Theft by Conversion in violation of O.C.G.A. § 16-8-4 by having lawfully obtained funds, the property of Priest Recycling with a value greater than \$1,500, under an agreement to make the specified disposition that said property be used for the operation of the Appalachian Gun Range, did knowingly convert said funds to their own use in violation of the agreement.
- (10) On or about the 15th day of October, 2020, the accused committed the offense of Theft by Conversion in violation of O.C.G.A. § 16-8-4 by having lawfully obtained funds, the property of Georgia Brass LLC with a value greater than \$1,500 but less than \$5,000, under an agreement to make the specified disposition that said property be used for the operation of the Appalachian Gun Range, did knowingly convert said funds to their own use in violation of the agreement.
- (11) On or about the 3rd day of November, 2020, the accused committed the offense of Theft by Conversion in violation of O.C.G.A. § 16-8-4 by having lawfully obtained funds, the property of Georgia Brass LLC with a value greater than \$1,500 but less than \$5,000, under an agreement to make the specified disposition that said property be used for the operation of the Appalachian Gun Range, did knowingly convert said funds to their own use in violation of the agreement.
- (12) On or about the 9th day of December, 2020, the accused committed the offense of Theft by Conversion in violation of O.C.G.A. § 16-8-4 by having lawfully obtained funds, the property of Georgia Brass LLC with a value less than \$1,500, under an agreement to make the specified disposition that said property be used for the operation of the Appalachian Gun Range, did knowingly convert said funds to their own use in violation of the agreement.
- (13) On or about the 15th day of December, 2020, the accused committed the offense of Theft by Taking in violation of O.C.G.A. § 16-8-2 by unlawfully taking property of Appalachian Gun Range, to wit: \$4,244.27, with the intent of depriving Appalachian Gun Range of said money.

- (14) On or about the 16th day of December, 2020, the accused committed the offense of Theft by Taking in violation of O.C.G.A. § 16-8-2 by unlawfully taking property of Appalachian Gun Range, to wit: \$5,527.37, with the intent of depriving Appalachian Gun Range of said money.
- (15) On or about the 18th day of December, 2020, the accused committed the offense of Theft by Taking in violation of O.C.G.A. § 16-8-2 by unlawfully taking property of Appalachian Gun Range, to wit: a firearm, with the intent of depriving Appalachian Gun Range of said firearm by transferring ownership of said firearm to accused Carlton Wilson, selling the firearm, and depositing the proceeds of the sale into the accused's joint checking account.
- (16) On or about the 31st day of December, 2020, the accused committed the offense of Theft by Taking in violation of O.C.G.A. § 16-8-2 by unlawfully taking property of Appalachian Gun Range, to wit: \$21,972.67, with the intent of depriving Appalachian Gun Range of said money.
- (17) On or about the 31st day of December, 2020, the accused committed the offense of Theft by Taking in violation of O.C.G.A. § 16-8-2 by unlawfully taking property of Appalachian Gun Range, to wit: \$4,150, with the intent of depriving Appalachian Gun Range of said money.
- (18) On or about the 2nd day of February, 2021, the accused committed the offense of Theft by Conversion in violation of O.C.G.A. § 16-8-4 by having lawfully obtained funds, the property of Windmill Enterprises with a value greater than \$1,500 but less than \$5,000 under an agreement to make the specified disposition that said property be used for the operation of the Appalachian Gun Range, did knowingly convert said funds to their own use in violation of the agreement.

- (19) On or about the 4th day of February, 2021, the accused committed the offense of Theft by Conversion in violation of O.C.G.A. § 16-8-4 by having lawfully obtained funds, the property of Georgia Brass LLC with a value greater than \$1,500 but less than \$5,000, under an agreement to make the specified disposition that said property be used for the operation of the Appalachian Gun Range, did knowingly convert said funds to their own use in violation of the agreement.
- (20) On or about the 1st day of April, 2021, the accused committed the offense of Theft by Conversion in violation of O.C.G.A. § 16-8-4 by having lawfully obtained funds, the property of Georgia Brass LLC with a value less than \$1,500 under an agreement to make the specified disposition that said property be used for the operation of the Appalachian Gun Range, did knowingly convert said funds to their own use in violation of the agreement.
- (21) On or about the 28th day of May, 2021, the accused committed the offense of Theft by Conversion in violation of O.C.G.A. § 16-8-4 by having lawfully obtained funds, the property of Georgia Brass LLC with a value less than \$1,500 under an agreement to make the specified disposition that said property be used for the operation of the Appalachian Gun Range, did knowingly convert said funds to their own use in violation of the agreement.
- (22) On or about the 22nd day of February, 2022, the accused committed the offense of Theft by Conversion in violation of O.C.G.A. § 16-8-4 by having lawfully obtained funds, the property of Georgia Brass LLC with a value greater than \$1,500 but less than \$5,000, under an agreement to make the specified disposition that said property be used for the operation of the Appalachian Gun Range, did knowingly convert said funds to their own use in violation of the agreement.

COUNT 2 – THEFT BY TAKING

in the name and behalf of the citizens of Georgia, charge and accuse **CARLTON KEITH WILSON and CYNTHIA HESTER WILSON**, individually and as parties to a crime, with the offense of **THEFT BY TAKING** for that the said accused, in the County of Pickens and the State of Georgia, between the dates of January 1, 2021 and December 31, 2021, did unlawfully take property of Appalachian Gun Range to wit: United States Currency which represented all cash proceeds of Appalachian Gun Range in an amount exceeding \$25,000, with the intent of depriving Appalachian Gun Range of said currency, contrary to the laws of said State, the good order, peace, and dignity thereof,

COUNT 3 – THEFT BY TAKING BY A FIDUCIARY

in the name and behalf of the citizens of Georgia, charge and accuse **CARLTON KEITH WILSON** with the offense of **THEFT BY TAKING BY A FIDUCIARY** for that the said accused, in the County of Pickens and the State of Georgia, on or about the 9th day of September, 2021, did unlawfully take property of Scouts of Hill City to wit: money, with the intent of depriving Scouts of Hill City of said money, and said money was taken by the accused while he was a fiduciary of Scouts of Hill City in breach of his fiduciary obligation, contrary to the laws of said State, the good order, peace, and dignity thereof,

COUNT 4 – THEFT BY TAKING BY A FIDUCIARY

in the name and behalf of the citizens of Georgia, charge and accuse **CARLTON KEITH WILSON** with the offense of **THEFT BY TAKING BY A FIDUCIARY** for that the said accused, in the County of Pickens and the State of Georgia, on or about the 10th day of September, 2021, did unlawfully take property of Scouts of Hill City to wit: money, with the intent of depriving Scouts of Hill City of said money, and said money was taken by the accused while he was a fiduciary of Scouts of Hill City in breach of his fiduciary obligation, contrary to the laws of said State, the good order, peace, and dignity thereof,

COUNT 5 – THEFT BY TAKING BY A FIDUCIARY

in the name and behalf of the citizens of Georgia, charge and accuse **CARLTON KEITH WILSON** with the offense of **THEFT BY TAKING BY A FIDUCIARY** for that the said accused, in the County of Pickens and the State of Georgia, on or about the 21st day of September, 2021, did unlawfully take property of Scouts of Hill City to wit: money, with the intent of depriving Scouts of Hill City of said money, and said money was taken by the accused while he was a fiduciary of Scouts of Hill City in breach of his fiduciary obligation, contrary to the laws of said State, the good order, peace, and dignity thereof,

COUNT 6 – THEFT BY TAKING BY A FIDUCIARY

in the name and behalf of the citizens of Georgia, charge and accuse **CARLTON KEITH WILSON** with the offense of **THEFT BY TAKING BY A FIDUCIARY** for that the said accused, in the County of Pickens and the State of Georgia, on or about the 10th day of October, 2021, did unlawfully take property of Scouts of Hill City to wit: money, with the intent of depriving Scouts of Hill City of said money, and said money was taken by the accused while he was a fiduciary of Scouts of Hill City in breach of his fiduciary obligation, contrary to the laws of said State, the good order, peace, and dignity thereof,

COUNT 7 – THEFT BY TAKING BY A FIDUCIARY

in the name and behalf of the citizens of Georgia, charge and accuse **CARLTON KEITH WILSON** with the offense of **THEFT BY TAKING BY A FIDUCIARY** for that the said accused, in the County of Pickens and the State of Georgia, on or about the 1st day of November, 2021, did unlawfully take property of Scouts of Hill City to wit: money, with the intent of depriving Scouts of Hill City of said money, and said money was taken by the accused while he was a fiduciary of Scouts of Hill City in breach of his fiduciary obligation, contrary to the laws of said State, the good order, peace, and dignity thereof,

COUNT 8 – THEFT BY TAKING BY A FIDUCIARY

in the name and behalf of the citizens of Georgia, charge and accuse **CARLTON KEITH WILSON** with the offense of **THEFT BY TAKING BY A FIDUCIARY** for that the said accused, in the County of Pickens and the State of Georgia, on or about the 1st day of December, 2021, did unlawfully take property of Scouts of Hill City to wit: money, with the intent of depriving Scouts of Hill City of said money, and said money was taken by the accused while he was a fiduciary of Scouts of Hill City in breach of his fiduciary obligation, contrary to the laws of said State, the good order, peace, and dignity thereof,

COUNT 9 – THEFT BY DECEPTION

in the name and behalf of the citizens of Georgia, charge and accuse **CARLTON KEITH WILSON** with the offense of **THEFT BY DECEPTION** for that the said accused, in the County of Pickens and the State of Georgia, between the dates of November 21, 2021 and January 28, 2022, did obtain money in an amount greater than \$5,000 but less than \$25,000, property of Pickens County Government, by deceitful means and with the intention of depriving Pickens County Government of the property by creating the impression of an existing fact which is false and the accused knew was false by claiming that injuries from a car accident prevented him from working for Pickens County Government and thereby qualified him to draw Sick Leave hours from Pickens County Shared Leave Program, contrary to the laws of said State, the good order, peace, and dignity thereof,

COUNT 10 – THEFT BY CONVERSION

in the name and behalf of the citizens of Georgia, charge and accuse **CARLTON KEITH WILSON and CYNTHIA HESTER WILSON**, individually and as parties to a crime, with the offense of **THEFT BY CONVERSION** for that the said accused, in the County of Pickens and the State of Georgia, on or about the 3rd day of November, 2019, having lawfully obtained funds, the property of Tracy Jeanne Pearson Revocable Trust with a value greater than than \$5,000, under an agreement to make the specified disposition that said property be used for the operation of the Appalachian Gun Range, did knowingly convert said funds to their own use in violation of the agreement, contrary to the laws of said State, the good order, peace, and dignity thereof,

COUNT 11 – THEFT BY CONVERSION

in the name and behalf of the citizens of Georgia, charge and accuse **CARLTON KEITH WILSON and CYNTHIA HESTER WILSON**, individually and as parties to a crime, with the offense of **THEFT BY CONVERSION** for that the said accused, in the County of Pickens and the State of Georgia, on or about the 27th day of March, 2020, having lawfully obtained funds, the property of Tracy Jeanne Pearson Revocable Trust with a value less than \$1,500, under an agreement to make the specified disposition that said property be used for the operation of the Appalachian Gun Range, did knowingly convert said funds to their own use in violation of the agreement, contrary to the laws of said State, the good order, peace, and dignity thereof,

COUNT 12 – TAMPERING WITH EVIDENCE

in the name and behalf of the citizens of Georgia, charges and accuses **CYNTHIA HESTER WILSON** with the offense of **TAMPERING WITH EVIDENCE** for that the said accused, in the County of Pickens and the State of Georgia, on or about the 20th day of April, 2022, with the intent to obstruct the prosecution herself, she knowingly altered and concealed physical evidence by partially obstructing the view of a security camera at Appalachian Gun Range, contrary to the laws of said State, the good order, peace, and dignity thereof.

/s/ [Signature]

Prosecuting Attorney

Christopher M. Carr
Attorney General
State of Georgia

John E. Fowler
Deputy Attorney General
State of Georgia

Office of the Georgia Attorney General
40 Capitol Square SW
Atlanta, GA 30334