

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: FAYETTE



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 14-1-01	DEFENDANT: (NAME and ADDRESS)
MDJ Hon. JASON COX	ANTOINETTE LOUISE HODGE
Address: 88 N GALLATIN AVE UNIONTOWN, PA 15401	First Name Middle Name Last Name Gen
Telephone: (724) 439-2954	81 S. GRANT ST., PO BOX 1561 UNIONTOWN, PA 15401 (443) 931-0547

NCIC Extradition Code Type

NCIC Extradition Code Type **3 - FELONY SURROUNDING STATES** Distance

12/20/22 **DEFENDANT IDENTIFICATION INFORMATION**

Case Number CR-593-22	Date Filed 12/19/2022	OTN/Live Scan Number R4029970	Complaint Number Z9A599C019	Incident Number PA 2021-218327	Request Lab Services? NO
Gender F	Date of Birth 07/18/1969	POB PA - USA	Add'l DOB	Co-Defendant? NO	
Defendant Also Known As	Defendant's First Name	Middle Name	Last Name	Suffix	
Race BLACK - B	Ethnicity NOT OF HISPANIC ORIGIN - N				
Hair Color BLACK - BLK	Eye Color BLACK - BLK				
DNA NO	DNA Location	Weight 200 LBS			
FBI Number	MNU Number	Height 5' 09"			
Defendant Fingerprinted NO	Fingerprint Classification				

DEFENDANT VEHICLE INFORMATION

Plate #	State	HazMat	Registration Sticker (MM/YY)	Commercial Vehicle?	School Veh.	Oth. NCIC Veh. Code	Reg. same as Def.
VIN	Year	Make	Model	Style	Color		NO

Office of the Attorney of the Commonwealth Approved Disapproved because:

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. Pa.R.Crim.P.507.)

(Name of Attorney for Commonwealth - Please Print or Type) _____ (Signature of Attorney for Commonwealth) _____ (Date) _____

I, **TPR. JONATHAN EBERHARDT** **657026/10869**
 (Name of Affiant - Please Print or Type) (PSP/MPOETC - Assigned Affiant ID Number & Badge #)

of **PENNSYLVANIA STATE POLICE, TROOP Z, HEADQUARTERS** **PAPSP1A00**
 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

do hereby state: (check appropriate box)

- I accuse the above named defendant who lives at the address set forth above
- I accuse the defendant whose name is unknown to me but who is described as
- I accuse the defendant whose name and popular designation or nickname is unknown to me and whom I have therefore designated as John Doe or Jane Doe.

with violating the penal laws of the Commonwealth of Pennsylvania at: **302**
 (Subdivision Code) **20 NORTH GALLATIN AVE., UNIONTOWN CITY**
 (Place-Political Subdivision)

in **FAYETTE** County **26** on or about **1/13/2020 AT APPROX. 00:00 HRS - 12/31/2021 AT APPROX. 00:00 HRS**
 (County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

12/20/22

Docket Number CR-593-22	Date Filed 12/19/2022	OTN/Live Scan Number R4029970	Complaint Number Z9A599C019	Incident Number PA 2021-218327
Defendant Name	First ANTOINETTE	Middle LOUISE	Last HODGE	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older 0				
Lead? YES	Offense # 1	Section 3921	Subsection A	PA Statute (Title) 18	Count 1	Grade F2	NCIC Offense Code 2704	UCR/NIBRS CC39
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):

THEFT BY UNLAW TAKING-MOVABLE PROP

Acts of the accused associated with this Offense:

IN THAT, on or about said dates, THE DEFENDANT did unlawfully take or exercise unlawful control over movable property, namely \$106,750.00 of U.S. Currency belonging to the City of Uniontown, with the intent to deprive the owner thereof, in violation of Section 3921(a) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older				
Lead? NO	Offense # 2	Section 3925	Subsection A	PA Statute (Title) 18	Count 1	Grade F2	NCIC Offense Code 2803	UCR/NIBRS CC39
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):

RECEIVING STOLEN PROPERTY

Acts of the accused associated with this Offense:

IN THAT, on or about said dates, THE DEFENDANT did intentionally receive, retain or dispose of movable property, namely \$106,750.00 in U.S. currency belonging to the City of Uniontown, with no intent to restore it to the owner, knowing that such property was stolen, or believing that it had probably been stolen, in violation of Section 3925(a) of the PA Crimes Code.



POLICE CRIMINAL COMPLAINT

12/20/22

Booklet Number CR-593-22	Date Filed 12/19/2022	OTN/Live Scan Number R4029970	Complaint Number Z9A599C019	Incident Number PA 2021-218327
Defendant Name	First ANTOINETTE	Middle LOUISE	Last HODGE	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older				
Lead? NO	Offense # 3	Section 3927	Subsection A	PA Statute (Title) 18	Count 1	Grade F2	NCIC Offense Code 2704	UCR/NIBRS CC39
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
THEFT BY FAIL TO MAKE REQ DISP FUNDS

Acts of the accused associated with this Offense:
IN THAT, on or about said dates, THE DEFENDANT did obtain property upon agreement, or subject to a known legal obligation, to make specified payments or other disposition, whether from such property or its proceeds or from her own property to be reserved in equivalent amount and did intentionally deal with the property obtained as her own and failed to make the required payment or disposition.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older				
Lead? NO	Offense # 4	Section 4113	Subsection A	PA Statute (Title) 18	Count 1	Grade M2	NCIC Offense Code 2704	UCR/NIBRS CC41
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
MISAPPLY ENTRUSTED/GOVT/FIN INST PROP

Acts of the accused associated with this Offense:
IN THAT, on or about said dates, THE DEFENDANT did apply or dispose of property that has been entrusted to her as a fiduciary, or property of the government or of a financial institution, in a manner which she knew is unlawful and involved substantial risk of loss or detriment to the owner of the property or to a person for whose benefit the property was entrusted.

12/20/22



POLICE CRIMINAL COMPLAINT

Report Number CR-593-22	Date Filed 12/16/2022	OTN/Live Scan Number R4029970	Complaint Number Z9A599C019	Incident Number PA 2021-218327
Defendant Name	First ANTOINETTE	Middle LOUISE	Last HODGE	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older				
Lead? NO	Offense # 5	Section 5101	Subsection	PA Statute (Title) 18	Count 1	Grade M2	NCIC Offense Code 5099	UCR/NIBRS CC51
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
OBSTRUCT ADMIN LAW/OTHER GOVT FUNC

Acts of the accused associated with this Offense:
IN THAT, on or about said dates, THE DEFENDANT did intentionally obstruct, impair or pervert the administration of law or other governmental function by force, violence, physical interference or obstacle, breach of official duty, or any other unlawful act.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older				
Lead? NO	Offense # 6	Section 4902	Subsection A	PA Statute (Title) 18	Count 1	Grade F3	NCIC Offense Code 5003	UCR/NIBRS CC49
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
PERJURY

Acts of the accused associated with this Offense:
IN THAT, on or about said dates, THE DEFENDANT, in an official proceeding, namely, a session of the 48th Statewide Investigating Grand Jury, made, while under oath or equivalent affirmation, a false statement, when said statement was material and said DEFENDANT did not believe it to be true, in violation of Section 4902(a) of the PA Crimes Code.



POLICE CRIMINAL COMPLAINT

12/20/22

Docket Number CR-593-22	Date Filed 12/19/2022	OTN/Live Scan Number R4029970	Complaint Number Z9A599C019	Incident Number PA 2021-218327
Defendant Name	Defendant's First Name ANTOINETTE	Middle Name LOUISE	Last Name HODGE	

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S.§4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 5
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statute cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

12/20/22

(Date)

TPA [Signature]

(Signature of Affiant)

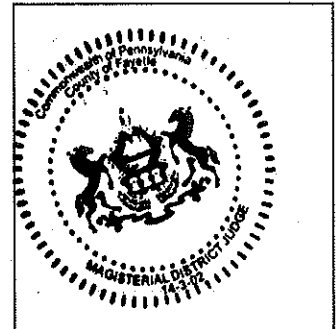
AND NOW, on this date, December 20, 2022 I certify that the complaint has been properly completed and verified. An affidavit of probable cause must be completed before a warrant can be issued.

14-3-02

(Magisterial District Court Number)

[Signature]
(Issuing Authority)

DANIEL C. SHIMSHOCK 14-3-02
MAGISTERIAL DISTRICT JUDGE
FAYETTE COUNTY, PENNSYLVANIA
MY COMM. EXP FIRST MON. JAN.2028





POLICE CRIMINAL COMPLAINT

12/20/22

Docket Number CR-593-22	Date Filed 12/20/2022	OTN/Live Scan Number R4029970	Complaint Number Z9A599C019	Incident Number PA 2021-218327
Defendant Name	First ANTOINETTE	Middle LOUISE	Last HODGE	

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Trooper Jonathan Eberhardt, is a Pennsylvania State Police Trooper, employed by the Commonwealth of Pennsylvania and currently assigned to the Bureau of Criminal Investigation, Western Organized Crime Unit. Your Affiant has been a member of the Pennsylvania State Police since 2008 and an investigator within the Bureau of Criminal Investigation since 2014. Your affiant has participated in the investigation, arrest, and prosecution of numerous persons for violations of the Pennsylvania Crimes Code.

Your Affiant has received training at the Pennsylvania State Police Academy in Hershey, Pennsylvania as well as basic and advanced criminal investigation training conducted by the Pennsylvania State Police. Your Affiant has participated in numerous investigations involving deaths and crimes of Burglary, Robbery, Theft, Assaults, Firearms Violations, Violations of the Controlled Substance, Device and Cosmetic Act, Gambling Violations, Public Corruption and a host of other crimes defined by the Pennsylvania Crimes Code. In addition, your Affiant was certified as a Certified Fraud Examiner in 2006. Your Affiant is also designated as a task force officer with the United States Federal Bureau of Investigation.

During the aforementioned period, your Affiant has been the primary and/or assisting investigator on numerous investigations that have resulted in successful prosecutions. Additionally, as part of these and other investigations, your Affiant has participated in consensual interceptions, non-consensual type interceptions, analyzed cellular telephone and tower data, and conducted surveillance of subjects suspected of taking part in criminal activity. Your Affiant has also participated in undercover operations in support of a variety of criminal investigations and worked with confidential informants, cooperating defendants, and other individuals in the development of cases. As a result, your Affiant has testified in numerous hearings, non-jury trials, and jury trials.

In February 2021, Uniontown City (Fayette County, Pennsylvania) officials made investigators aware of issues and discrepancies noted with regards to the Uniontown City Treasurer's office. During the course of the

I, TPR. JONATHAN EBERHARDT BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Handwritten signature of Jonathan Eberhardt

(Signature of Affiant)

Sworn to me and subscribed before me this 20 day of December 2022

Date *[Signature]*

, Magisterial District Judge

My commission expires first Monday of January,

DANIEL C. SHIMSHOCK 14-3-02
MAGISTERIAL DISTRICT JUDGE
FAYETTE COUNTY, PENNSYLVANIA
MY COMM. EXP FIRST MON. JAN. 2028





POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE

12/20/22

Docket Number CR-593-22	Date Filed 12/15/2022	OTN/Live Scan Number R4029970	Complaint Number Z9A599C019	Incident Number PA 2021-218327
Defendant Name	First ANTOINETTE	Middle LOUISE	Last HODGE	

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

investigation, it was discovered that at least \$106,750.00 in Uniontown City funds were missing. These funds represented city income from various sources including, but not limited to, city and school tax proceeds that were under the direct control and handling of the Uniontown City Treasurer's office. The defendant, Antoinette Louise Hodge, was elected and subsequently assumed the position of Uniontown City Treasurer in January 2020 through the date of this complaint.

The evidence in this investigation was presented to the Forty-Eighth Statewide Investigating Grand Jury. The Grand Jury took testimony from several witnesses and considered a multitude of exhibits. Subsequently, on December 14, 2022, the Forty-Eighth Statewide Investigating Grand Jury issued Presentment No.14 recommending the arrest of Antoinette Louise Hodge for violations of the Pennsylvania Crimes Code. The presentment was accepted by the Honorable Anthony Mariani, Supervising Judge of the Forty-Eighth Statewide Investigating Grand Jury by Order dated December 16, 2022. A copy of the Presentment and the Order accepting the Presentment are attached hereto and incorporated herein by reference. After participating in this investigation, and having read and reviewed the Presentment, and considering all the facts and circumstances, your Affiant is adopting the Presentment and incorporating it fully into this Affidavit of Probable Cause. Based upon my review of the testimony given before the Grand Jury and the documents produced for the Grand Jury, I believe that the testimony of the various witnesses and the records referred to in the Presentment are reflected accurately.

Based upon my review of the evidence, I have concluded that there is probable cause to believe that Antoinette Louise Hodge engaged in illegal activities which are accurately summarized in the attached Presentment. Your Affiant avers that there is probable cause to conclude that Hodge violated the following laws of the Commonwealth of Pennsylvania: Theft by Unlawful Taking, Receiving Stolen Property, Theft by Failure to Make Required Disposition of Funds Received, Misapplication of Entrusted Property, Obstructing Administration of Law or Other Governmental Function, and Perjury.

Based on the facts set forth in this Affidavit and the attached Presentment, your Affiant respectfully requests that the Defendant, Antoinette Louise Hodge, be arraigned on the charges set forth in this criminal complaint, or if she is not present during those proceedings, that a warrant be issued for her arrest.

REFER TO ATTACHMENT "A" : FORTY-EIGHTH STATEWIDE INVESTIGATING GRAND JURY PRESENTMENT NO. 14.

(Signature of Affiant)

INTRODUCTION

We, the members of the Forty-Eighth Statewide Investigating Grand Jury, having received and reviewed evidence pertaining to suspected violations of Pennsylvania Crimes Code in and around Fayette County pursuant to Notice of Submission of Investigation Number 32, do hereby make the following findings of fact and recommendation of charges.

FINDINGS OF FACT

The Grand Jury conducted an investigation into the theft of approximately \$106,000 in taxpayer funds collected by the Uniontown City Treasurer's Office in Fayette County between 2020 and 2021. It was determined that Antoinette Hodge, who was elected to serve as the City Treasurer in November 2019, converted this money for her own personal gain. The investigation further determined that during this period Hodge took numerous costly vacations while also spending tens of thousands of dollars each year on an expensive gambling habit.

The City Treasurer's Office is responsible for collecting taxes and fees, including city and school taxes and sewage fees. During the time period of the theft, there were three individuals who worked in the office: Hodge, Deputy Treasurer Crystal Lewis and Doreen Mahoney, who worked as a clerk.

In the early months of 2021, after more than a dozen taxpayers received delinquency notices despite the fact that they had paid their taxes, mostly in cash, the City Council launched an investigation. Charlie Rupert, a forensic accountant, was subsequently hired to conduct an extensive forensic audit for the 2020-2021 time-frame.

Rupert appeared and testified before the Grand Jury. He explained that he collected information from the bank concerning all deposits made by the Treasurer's Office and analyzed data from RAK, the Treasurer's Office collection software system. He also reviewed taxpayer

receipts, or tickets, from the tax office and the calculator tape that the office used to tally either individual or daily transactions. Rupert testified that he reviewed every cash transaction for 2021 and found that there was a total loss of \$106,750 between 2020 and 2021.

In the course of his investigation, Rupert spoke with Hodge in early August 2021. She relayed that Lewis and Mahoney were primarily responsible for collecting the money and that she was responsible for overseeing the office and delivering the collected money to the bank. Rupert testified that he had questioned Hodge about several missing cash deposits from May and July 2021. Hodge denied knowledge of the missing deposits from May, but claimed that the July deposits were made a few days prior to their meeting and likely had not cleared the bank records yet. Rupert testified that he later learned that Hodge delivered the missing deposits from May and July 2021 to the bank the day after their meeting.

Trooper Jon Eberhardt (Trooper Eberhardt) of the Pennsylvania State Police Organized Crime Unit was subsequently assigned to this investigation and testified before the Grand Jury. Trooper Eberhardt informed the Grand Jury that Clayton Gregg, an auditor with McClure and Wolfe, had performed annual audits of the City Treasurer's Office for several years. Gregg reported that there had never been any notable irregularities prior to Hodge taking office.

The Grand Jury also heard testimony from Lewis and Mahoney who explained the processes used in the collection and deposit of taxpayer funds. Lewis and Mahoney explained how they each received cash payments and how to properly document these receipts. Evidence of this documentation was verified by Lewis and admitted as evidence before the Grand Jury.

During their appearances before the Grand Jury, Lewis and Mahoney each outlined several changes that were instituted by Hodge upon taking office. They noted that under the prior administration, they would work together at the end of the day to make sure the cash and checks

correlated with all of the transactions recorded for the day. Either Lewis or Mahoney would record this process on adding machine tape and then Lewis would complete a deposit slip so that the Treasurer could deliver the checks and cash to the bank the very next morning.

Lewis testified that, under Hodge's direction, she no longer filled out the daily deposit slips. Instead, Hodge assumed this responsibility. Lewis would provide Hodge with the pile of checks, cash, tickets, and adding machine tape each day and Hodge would put the items in the safe in her [Hodge's] office.

Lewis stated that she tried to explain to Hodge that the deposits should be made each day. Hodge responded, however, that she was "in charge" and would make the deposits as she deemed appropriate. Lewis told the Grand Jury that sometimes weeks would pass before Hodge would actually make a bank deposit.

Lewis testified that under the prior administration, she would review the bank statements for the tax accounts each month. Once Hodge took office, however, Hodge took over review of the tax accounts. Lewis advised that she had not seen any bank statements for the tax accounts since early 2020.

Lewis also testified about the workings of the RAK reporting system where each transaction was recorded. Lewis stated that Hodge came up with an idea where cash transactions would be noted with a double asterisk. Lewis advised that she was unaware of how this would affect the recording of a cash transaction in the RAK system, however.

In his appearance before the Grand Jury, Rupert testified that this double asterisk system was implemented the day after he confronted Hodge about the missing cash and deposits. Rupert stated that using the double asterisk system effectively moved all cash transactions to the check

column. Consequently, whenever the report of transactions was viewed, it could not readily be determined how much cash was actually received and/or was missing from the accounts.

Lewis testified that she first learned of the missing cash approximately one week prior to her testimony in May 2022. Lewis stated she was "taken aback" and "shocked" when she observed that there were several bank deposits made with checks only and no cash. Lewis reiterated that Hodge took over all verification of funds for the tax accounts and Lewis had no way of knowing about the missing monies since it was Hodge who controlled those accounts.

Lewis noted that Hodge has taken several vacations since becoming Treasurer, including trips to Jamaica, Costa Rica, and Disney World. Lewis indicated that Hodge was also planning a trip to Paris.

Lewis testified that Hodge would buy lunch for her [Lewis] and Mahoney each day. Additionally, Lewis informed the Grand Jury that she observed Hodge with a stack of lottery daily number tickets, as well as a stack of expensive scratch-off tickets, on a daily basis.

Sonia Rusinack is a manager at BB's Market, a convenience store located in Uniontown. Rusinack testified that Hodge came into the store seven days a week and usually two to three times per day for the sole purpose of gambling. Rusinack testified that Hodge played the daily and evening lottery numbers every single day and typically spent \$500-\$600 per day on those tickets. Rusinack informed the Grand Jury that Hodge would make a daily purchase of \$20 and \$30 value scratch-off tickets, spending several hundred dollars each day. Rusinack testified that Hodge would also play a skills machine in the store, spending between \$500 and \$1,000 each day. Rusinack indicated that she "fronted" Hodge as much as \$500 and that Hodge still owed her \$150. Hodge stopped coming to the store, however.

Through his investigation, Trooper Eberhardt found that Hodge had a history of gambling at the local casinos and he obtained records from various area casinos with player card information attached to Hodge. Her records revealed annual losses at four area casinos. Most notably, Hodge's records from the Lady Luck Casino at Nemaquin for the 2019 calendar year reflected a total amount of \$62,971.75 "in" and a total amount of \$53,126.15 "out," for a loss of \$9,845.60; for the 2020 calendar year, the records reflected a total amount of \$67,160.48 "in" and a total amount of \$56,217 "out," for a loss of \$10,942.64; and, for the calendar year 2021, the records revealed a total amount of \$14,197.29 "in" and a total amount of \$14,186.76 "out," for a loss of \$10.53.

Hodge testified before the Grand Jury and, in sum, her testimony contradicted the testimony of every other witness on nearly every critical issue. Hodge denied playing lottery tickets and scratch-off tickets on a daily basis. Hodge stated that she would only play the "cheap" scratch-off tickets on rare occasions, such as her birthday. Hodge testified that she would often buy scratch-off tickets for her mother but would only spend \$20 on low level tickets.

Hodge testified that she is "cheap" and would only spend approximately \$100 on a trip to a casino. She stated that her mother was the one who often used Hodge's player's card and that Hodge would take her mother with her every time she went to a casino. This statement was completely contradicted by the testimony of Hodge's boyfriend, Delonte Reeves, who testified that Hodge's mother had her own card and that Hodge used her (Hodge's) player's card whenever they would go to the casino together. Reeves also stated that he has been to the casino with Hodge several times; however, he only recalled Hodge's mother going with them on one occasion.

Hodge was questioned about the RAK system and she stated that she agreed that the system separated cash and check payments into different columns. Hodge admitted that she directed Lewis and Mahoney to start putting a double asterisk into the RAK system whenever they entered

information pertaining to a cash deposit. Hodge was shown the RAK information for August 3, 2021, the day after Rupert visited the office. Hodge admitted that adding the double asterisk moved the cash payments over to the check column and that this process began on August 3, 2021.

Hodge testified that she made deposits into the tax accounts on a daily basis. This testimony, however, was contradicted by the bank records and evidence provided by Rupert.

Hodge later testified that although sometimes two weeks passed before she made a deposit, there would be individual deposit slips for each date. Again, this testimony was contradicted by the bank records.

Hodge testified that when she met with Rupert, he never discussed policies or procedures with her. She stated that Rupert informed her that her office was stealing money, but never reviewed any specific deposit information with her. Hodge advised that she was unaware of Rupert's findings because he never discussed any specifics with her. Again, the Grand Jury finds that this statement was contradicted by Rupert's credible testimony. Specifically, Rupert testified that he told Hodge in August that over \$19,000 in cash was missing from bank deposits.

Hodge also denied that Rupert ever discussed missing bank deposits from dates in May and July 2021. Hodge was asked about each specific transaction and denied being asked about the transaction or aware of the missing deposits.

Hodge testified that during their meeting, she showed Rupert her safe. She stated that the only money in the safe consisted of parking monies and that she did not keep money anywhere else. Hodge was then confronted with a bank deposit made on August 3, 2021, the day after her meeting with Rupert, where she made a deposit of funds purportedly from May 17, 2021 and marked the deposit slip as "found in safe." Hodge testified that she found the money in the safe on the same day that Rupert came to her office.