

Indictment No. SPCR22-033104-56
22CHM04243/P2211195
In the Superior Court of Chatham County, State of Georgia
December Term, 2022

THE STATE OF GEORGIA

VERSUS
LEILANI MAREE SIMON

OFFENSES: MALICE MURDER, FELONY MURDER
(TWO COUNTS), CONCEALING THE DEATH OF
ANOTHER, FALSE REPORT OF A CRIME, AND
MAKING A FALSE STATEMENT (FOURTEEN COUNTS)

WITNESS:
Marian Lemmons, Chatham County Police
Department

True BILL

14 Dec, 2022

[Signature]
FOREPERSON

Shalena Cook Jones
District Attorney
Eastern Judicial Circuit
of Georgia

TIM DEAN
ASSISTANT DISTRICT ATTORNEY

Returned in open court this 14 day of

December, 2022

[Signature]
(Deputy) Clerk, Superior Court of
Chatham County, Georgia

Filed in office this 14 day of

December, 2022

[Signature]
(Deputy) Clerk, Superior Court of
Chatham County, Georgia

Defendant, on _____ being in open court, pleads _____

Defendant

Attorney for Defendant

Defendant, on _____ being in open court, PLEADS GUILTY and waives the right to trial by jury; the presumption of innocence; the right to confront witnesses against oneself; the right to subpoena witnesses; the right to testify and to offer other evidence; the right to assistance of counsel during trial; the right not to incriminate oneself; and understands that by pleading not guilty or remaining silent and not entering a plea, one obtains a jury trial.

Defendant

Attorney for Defendant

We, the Jury, find the defendant

THUMBPRINT(S) OF DEFENDANT
(left) (right)

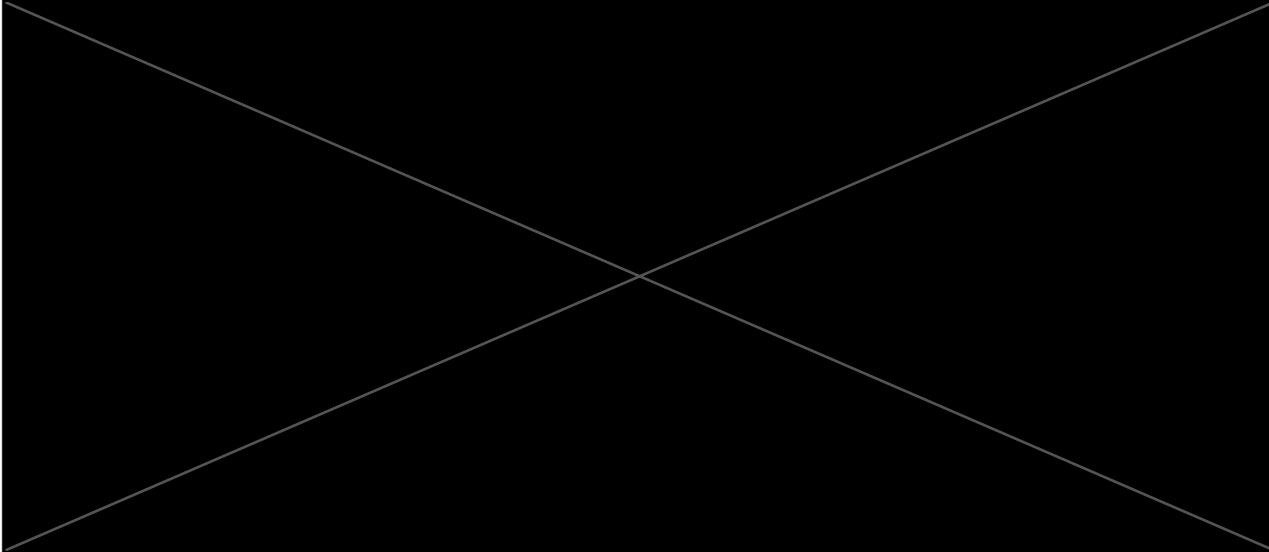
FOREPERSON DATE

STATE OF GEORGIA, COUNTY OF CHATHAM

BILL OF INDICTMENT

IN THE SUPERIOR COURT OF SAID COUNTY,

THE GRAND JURORS selected, chosen and sworn for the County of Chatham to wit:



MURDER AND CONCEALING THE DEATH OF ANOTHER

COUNT 1: MALICE MURDER

O.C.G.A. 16-5-1(a)

in the name of and on behalf of the citizens of the State of Georgia, charge and accuse LEILANI MAREE SIMON, with the offense of MALICE MURDER, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 5th day of October, 2022, did unlawfully, with malice aforethought, cause the death of her son Quinton Simon, a human being, in a manner unknown to the grand jury at this time, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 2: FELONY MURDER

O.C.G.A. 16-5-1(c)

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of FELONY MURDER, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 5th day of October, 2022, did commit the offense of aggravated assault in violation of O.C.G.A. 16-5-21, a felony, in that the accused did make an assault upon the person of her son Quinton Simon with an object that when used offensively against a person did result in serious bodily injury, the nature of the object being unknown to the grand jury at this time, and the accused did, in the commission of this offense, cause Quinton's death, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 3: FELONY MURDER
O.C.G.A. 16-5-1(c)

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of FELONY MURDER, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 5th day of October, 2022, did commit the offense of cruelty to a child in the first degree in violation of O.C.G.A. 16-5-70 in that the accused did maliciously cause her son Quinton Simon, a human being and a child under the age of eighteen (18) years, cruel and excessive physical pain, in a manner unknown to the grand jury at this time, and the accused did, in the commission of this offense, cause Quinton's death, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 4: CONCEALING THE DEATH OF ANOTHER
O.C.G.A. 16-10-31

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of CONCEALING DEATH OF ANOTHER, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 5th day of October, 2022, did unlawfully conceal the death of her son Quinton Simon by discarding him in a dumpster at Azalea Mobile Home Plaza, which hindered the discovery of whether Quinton was unlawfully killed, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

FALSEHOODS ON OCTOBER 5, 2022

COUNT 5: FALSE REPORT OF A CRIME
O.C.G.A. 16-10-26

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of FALSE REPORT OF A CRIME, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 5th day of October, 2022, did willfully and knowingly give a false report of a crime to the Chatham County Police Department, a law enforcement agency of this state, by implying that Quinton Simon had been abducted by an unknown intruder, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 6: MAKING A FALSE STATEMENT
O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of MAKING A FALSE STATEMENT, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 5th day of October, 2022, did knowingly and willfully make a false statement to Marian Lemmons of the Chatham County Police Department and Bradford Snider of the Federal Bureau of Investigation, law enforcement officers engaged in the lawful discharge of their official duties investigating the disappearance of Quinton Simon, a matter within the jurisdiction of the Chatham County Police Department, a department of the government of this county, to investigate, by, having admitted that she had left her home in the late night hours of October 4, 2022 to meet her drug dealer, falsely stating that the purpose of this meeting was to pay an existing drug debt, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 7: MAKING A FALSE STATEMENT
O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of MAKING A FALSE STATEMENT, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 5th day of October, 2022, did knowingly and willfully make a false statement to Marian Lemmons of the Chatham County Police Department and Bradford Snider of the Federal Bureau of Investigation, law enforcement officers engaged in the lawful discharge of their official duties investigating the disappearance of Quinton Simon, a matter within the jurisdiction of the Chatham County Police Department, a department of the government of this county, to investigate, by falsely stating that the only controlled substance of which she was a regular user was marijuana, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 8: MAKING A FALSE STATEMENT
O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of MAKING A FALSE STATEMENT, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 5th day of October, 2022, did knowingly and willfully make a false statement to Marian Lemmons of the Chatham County Police Department and Bradford Snider of the Federal Bureau of Investigation, law enforcement officers engaged in the lawful discharge of their official duties investigating the disappearance of Quinton Simon, a matter within the jurisdiction of the Chatham County Police Department, a department of the government of this county, to investigate, by falsely stating that the only controlled substance she had used in the past twenty-four hours was marijuana, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 9: MAKING A FALSE STATEMENT
O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of MAKING A FALSE STATEMENT, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 5th day of October, 2022, did knowingly and willfully make a false statement to Marian Lemmons of the Chatham County Police Department and Bradford Snider of the Federal Bureau of Investigation, law enforcement officers engaged in the lawful discharge of their official duties investigating the disappearance of Quinton Simon, a matter within the jurisdiction of the Chatham County Police Department, a department of the government of this county, to investigate, by, having admitted that she had left her home in the early morning hours of October 5, 2022, falsely stating that the purpose of this trip was to meet her friend "Misty" to obtain Orajel, a topical pain reliever, from "Misty" and that on this trip the accused had in fact met "Misty" at a Chevron service station and had obtained Orajel from her, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 10: MAKING A FALSE STATEMENT
O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of MAKING A FALSE STATEMENT, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 5th day of October, 2022, did knowingly and willfully conceal from Marian Lemmons of the Chatham County Police Department and Bradford Snider of the Federal Bureau of Investigation, law enforcement officers engaged in the lawful discharge of their official duties investigating the disappearance of Quinton Simon, a matter within the jurisdiction of the Chatham County Police Department, a department of the government of this county, to investigate, a material fact, to wit: that in the early morning hours of October 5, 2022, she had in fact traveled to Azalea Mobile Home Plaza and there had discarded her son Quinton Simon in a dumpster, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

FALSEHOODS ON OCTOBER 8, 2022

COUNT 11: MAKING A FALSE STATEMENT
O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of MAKING A FALSE STATEMENT, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 8th day of October, 2022, did knowingly and willfully make a false statement to Bridget Brock of the Federal Bureau of Investigation, a law enforcement officer engaged in the lawful discharge of her official duties investigating the disappearance of Quinton Simon, a matter within the jurisdiction of the Chatham County Police Department, a department of the government of this county, to investigate, by, having admitted that she had left her home to meet her drug dealer in the late night hours of October 4, 2022, falsely stating that the purpose of this meeting was to pay an existing drug debt, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 12: MAKING A FALSE STATEMENT
O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of MAKING A FALSE STATEMENT, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 8th day of October, 2022, did knowingly and willfully conceal from Bridget Brock of the Federal Bureau of Investigation, a law enforcement officer engaged in the lawful discharge of her official duties investigating the disappearance of Quinton Simon, a matter within the jurisdiction of the Chatham County Police Department, a department of the government of this county, to investigate, a material fact, to wit: that on the night of October 4, 2022 she had used controlled substances, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 13: MAKING A FALSE STATEMENT

O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of MAKING A FALSE STATEMENT, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 8th day of October, 2022, did knowingly and willfully make a false statement to Bridget Brock of the Federal Bureau of Investigation, a law enforcement officer engaged in the lawful discharge of her official duties investigating the disappearance of Quinton Simon, a matter within the jurisdiction of the Chatham County Police Department, a department of the government of this county, to investigate, by, having admitted that she had left her home in the early morning hours of October 5, 2022 and had traveled to Azalea Mobile Home Plaza, falsely stating that the purpose of this trip was to meet her friend "Misty" to obtain Orajel, a topical pain reliever, from "Misty" and that on this trip the accused had in fact met "Misty" at Azalea Mobile Home Plaza and had obtained Orajel from her, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 14: MAKING A FALSE STATEMENT

O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of MAKING A FALSE STATEMENT, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 8th day of October, 2022, did knowingly and willfully conceal from Bridget Brock of the Federal Bureau of Investigation, a law enforcement officer engaged in the lawful discharge of her official duties investigating the disappearance of Quinton Simon, a matter within the jurisdiction of the Chatham County Police Department, a department of the government of this county, to investigate, a material fact, to wit: that in the early morning hours of October 5, 2022, at Azalea Mobile Home Plaza, she had discarded her son Quinton Simon in a dumpster, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

FALSEHOODS ON OCTOBER 12, 2022

COUNT 15: MAKING A FALSE STATEMENT

O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of MAKING A FALSE STATEMENT, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 12th day of October, 2022, did knowingly and willfully make a false statement to Bradford Snider and Savannah Solomon of the Federal Bureau of Investigation, law enforcement officers engaged in the lawful discharge of their official duties investigating the disappearance of Quinton Simon, a matter within the jurisdiction of the Chatham County Police Department, a department of the government of this county, to investigate, by, having admitted that she had left her home in the early morning hours of October 5, 2022 and had traveled to Azalea Mobile Home Plaza, falsely stating that the purpose of this trip was to meet her friend "Misty" to obtain Orajel, a topical pain reliever, from "Misty" and that on this trip the accused had in fact met "Misty" at Azalea Mobile Home Plaza and had obtained Orajel from her, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 16: MAKING A FALSE STATEMENT
O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of MAKING A FALSE STATEMENT, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 12th day of October, 2022, did knowingly and willfully make a false statement to Bradford Snider and Savannah Solomon of the Federal Bureau of Investigation, law enforcement officers engaged in the lawful discharge of their official duties investigating the disappearance of Quinton Simon, a matter within the jurisdiction of the Chatham County Police Department, a department of the government of this county, to investigate, by, having admitted that she had discarded something in a dumpster at Azalea Mobile Home Plaza in the early morning hours of October 5, 2022, falsely stating that all she had discarded was normal household garbage, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 17: MAKING A FALSE STATEMENT
O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of MAKING A FALSE STATEMENT, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 12th day of October, 2022, did knowingly and willfully conceal from Bradford Snider and Savannah Solomon of the Federal Bureau of Investigation, law enforcement officers engaged in the lawful discharge of their official duties investigating the disappearance of Quinton Simon, a matter within the jurisdiction of the Chatham County Police Department, a department of the government of this county, to investigate, a material fact, to wit: that in the early morning hours of October 5, 2022, at Azalea Mobile Home Plaza, she had discarded her son Quinton Simon in a dumpster, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

FALSEHOOD ON OCTOBER 31, 2022

COUNT 18: MAKING A FALSE STATEMENT
O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of MAKING A FALSE STATEMENT, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 31st day of October, 2022, did knowingly and willfully make a false statement to Marian Lemmons of the Chatham County Police Department and Savannah Solomon and Bradford Snider of the Federal Bureau of Investigation, law enforcement officers engaged in the lawful discharge of their official duties investigating the disappearance of Quinton Simon, a matter within the jurisdiction of the Chatham County Police Department, a department of the government of this county, to investigate, by falsely stating that it was not the accused but rather Daniel Youngkin who had traveled away from the home in the early morning hours of October 5, 2022, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

FALSEHOOD ON NOVEMBER 21, 2022

COUNT 19: MAKING A FALSE STATEMENT

O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse LEILANI MAREE SIMON, with the offense of MAKING A FALSE STATEMENT, for that the said LEILANI MAREE SIMON, in the County of Chatham and State of Georgia, on or about the 21st day of November, 2022, did knowingly and willfully make a false statement to Marian Lemmons of the Chatham County Police Department and Savannah Solomon of the Federal Bureau of Investigation, law enforcement officers engaged in the lawful discharge of their official duties investigating the disappearance of Quinton Simon, a matter within the jurisdiction of the Chatham County Police Department, a department of the government of this county, to investigate, by, having once again admitted that she, not Daniel Youngkin, had left the home in the early morning hours of October 5, 2022 and had traveled to Azalea Mobile Home Plaza and having admitted that she had had no contact there with her friend "Misty," falsely stating that she did not remember what she had done there, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.



SHALENA COOK JONES
DISTRICT ATTORNEY
EASTERN JUDICIAL CIRCUIT
OF GEORGIA