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MUNICIPAL COURT
BY CW DEPUTY

IN THE CLARK COUNTY MUNICIPAL COURT

CLARK COUNTY, OHIO

Cindy Lawson, Plaintiff

CASE NO.: 25SPM0010.0

v.

Mary Joyce Chilton (aka Joyce M. Chilton), Defendant

JUDGE: _____

RE: Criminal Complaint Against Joyce Chilton

Filed on: July 11, 2025

I. Introduction

Cindy Lawson brings this criminal complaint as a lawful heir of the late Paul Douglas Chilton, asserting that Joyce Chilton knowingly committed perjury, falsification, theft, and fraud in violation of Ohio law. This includes Joyce Chilton's misrepresentation to Probate Court concerning Paul Chilton's heirs and her unlawful actions to benefit herself at the expense of the rightful beneficiaries.

II. Allegations

The complainant alleges the following criminal offenses against Joyce Chilton under the Ohio Revised Code (ORC):

- **Perjury** (ORC 2921.13): Falsely testified under oath in Probate Court documents.
- **Falsification** (ORC 2921.13): Knowingly submitted false written statements to deceive Probate Court.
- **Theft** (ORC 2913.02): Deprived lawful heirs of assets through fraudulent conveyance and misappropriation.
- **Fraud** (ORC 2913.04): Deceptively manipulated estate transfer proceedings for personal gain.
- **Will Concealment (ORC 2107.10)** Joyce Chilton thru representation, and registered letter mailed me a will on May 23, 2025, as proof we were disinherited by the deceased, Ohio law requires a will be filed with in a year of death

III. Statement of Facts

1. False Representation of Intestacy and Heirs

- On *February 6, 2019*, Joyce Chilton sought a Certificate of Transfer (Exhibit A) from Clark County Probate Court for several properties originally owned by Paul D. Chilton. The deeds did not include directions for survivorship or additional owners.
- She submitted a signed affidavit (Exhibit A) under oath, declaring falsely that Paul Chilton had no children and died intestate, despite clear evidence to the contrary.
- Joyce Chilton paid a fee of 68.00 and then closed the case within 24 hours.
- Joyce Chilton was a city commissioner at the time of this transaction.
- Joyce Chilton was able to receive an affidavit of title to a property she waived rights to when she transferred joint tenancy properties on January 31, 2019 representing the fact the case was not highly scrutinized by the probate court.
- Probate court refused to reopen the case, stating the request was untimely.

2. Acknowledgment of Children

- Joyce married Paul Chilton in the 1970s, several years after the birth of his three children. His name appears as the father on all three birth certificates, and numerous witnesses, including close family friends and neighbors, can confirm that Paul and Joyce openly acknowledged these children as his offspring.

3. Discovery of Fraud

- I am disabled and on a fixed income. I have financial challenges so I sought out new income streams as well as contacting people who may

owe me money. She triggered a deeper review of the estate by refusing to share my father's needed medical records with my sister and at the time my medical provider coupled with the fact she goes out of her way to be rude. It started at my father's services. Joyce Chilton was contacted when I found property that she had claimed sole survivorship. An email was sent in July 2024 discussed my findings regarding the estate and offered a settlement. She refused. I am disabled and sometimes struggle with focusing that being explained I reached out to her maybe a year ago and just recently advised her I was filing charges and suing in May of 2025.

- b. On or about *May 25, 2025*, Cindy Lawson received a letter from Joyce Chilton's attorney claiming a 54-year-old document—a supposed child support order—was located along with Paul Chilton's will. Both items were allegedly stored in a safe deposit box at a law office that is not her current representation, since 1985. It appears she controls a lockbox it was stored. I am aware of multiple child support orders. There are at least 2 orders more current than 1971.
- c. This disclosure occurred well outside the one-year statutory limit (ORC Section 2107.10) requiring the will's presentation to court following a person's death.
- d. Joyce Chilton indicated that Paul Chilton died intestate when she petitioned the court for a Certificate of Transfer for multiple properties
- e. Joyce Chilton did not prove debt.
- f. She did not divulge the value of the estate to be more than 40,000.00, which would have required a traditional review. No appraisals were required

4. Intent to Defraud

- a. Through email communications and text messages, Joyce Chilton repeatedly refused to mediate or address concerns raised by me regarding the estate. Instead, she consistently communicated dismissal, often stating, "Take me to court." Joyce Chilton submitted statements to the court and myself she knew to be true

5. Impact of Misrepresentation

- a. Joyce Chilton's deliberate actions excluded lawful heirs under Ohio intestacy law, violating their rights to inheritance.
- b. Children considered "born out of wedlock" are nonetheless eligible heirs under ORC § 2105.06 if a biological connection is recognized, as it is here by documentation and witness testimony.
- c. Joyce Chilton's bad behavior allowed her to benefit from the sale of properties she was not the sole owner of.

IV. Statutory Grounds

The allegations against Joyce Chilton are supported by the following statutes under the Ohio Revised Code:

1. **Perjury (ORC § 2921.13)**: Joyce knowingly made false statements under oath concerning the decedent's heirs and testamentary status, intending to mislead the court.
2. **Falsification (ORC § 2921.13)**: She knowingly submitted affidavits with false information regarding the existence of a will and known heirs.
3. **Theft (ORC § 2913.02)**: She exerted unauthorized control over the property of the estate, depriving rightful heirs.
4. **Fraud (ORC § 2913.04)**: Joyce engaged in deceptive practices to claim sole ownership and survivorship rights over the estate.

IV Related Case Law

While the complaint doesn't cite specific past cases, the actions alleged share features with published Ohio court decisions in similar circumstances.

- ****In re Estate of Williams, 2018-Ohio-2271 (Ohio Ct. App.):****

- Addresses remedies for mishandling or concealment of probate assets and duties to heirs.

- ****State v. Chandler, 2015-Ohio-1791 (Ohio Ct. App.):****

- Considers evidence of forgery and perjury in estate matters and the burden of proof required.

- ****In re Estate of Rozsa, 409 N.E.2d 1081 (Ohio App. 8th Dist. 1980):****

- Discusses duty to disclose and promptly file a will and consequences of will suppression.

- ****State v. Braden, 2004-Ohio-4529:****

- Explores theft and fraud charges in the context of misappropriating estate assets.

VI. Exhibits

- **Exhibit A:** Certificate of Transfer dated February 6, 2019, and supporting affidavit submitted by Joyce Chilton declaring no heirs and intestacy.
- **Exhibit B:** Email correspondence between Joyce Chilton and Cindy Lawson demonstrating awareness of the fraud.
- **Exhibit C:** Copies of Paul Chilton's children's birth certificates.
- **Exhibit D:** Letter from Joyce Chilton's attorney dated May 25, 2025, disclosing the late discovery of a supposed will.

VII. Relief Sought

Plaintiff respectfully petitions this Court to:

1. Initiate criminal proceedings against Joyce Chilton under ORC § 2935.09(A) and (D).
2. Issue a warrant for her arrest based on probable cause established by the attached affidavit and supporting evidence.
3. Order restitution for damages caused to the rightful heirs, including accounting for withheld estate assets, earnings from investment property, and forfeiting her right to benefit from the estate.

VIII. Conclusion

The Plaintiff believes that Joyce Chilton willfully obstructed proper estate administration using misrepresentation and fraudulent documents, depriving lawful heirs of their rightful inheritance. Probable cause exists for this Court to proceed with criminal charges under the above-referenced statutes.


Cindy Lawson

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IN THE CLARK COUNTY MUNICIPAL COURT

CLARK COUNTY, OHIO

MUNICIPAL COURT

BY CW DEPUTY

In RE: Criminal Charges

Matter NO: _____

Against

Mary Joyce Chilton

Judge: _____

AKA: Joyce Chilton

July 14, 2025

BENCH MEMORANDUM IN SUPPORT OF THE ATTACHED R.C. 2935.09 (A) AND (D)

CRIMINAL CHARGES OF CINDY LAWSON AGAINST JOYCE CHILTON

Cindy Lawson respectfully offers this bench memorandum in support of the attached affidavit under R.C. 2935.09 (A) (B) and (D):

A) As used in this section, "reviewing official" means a judge of a court of record, the prosecuting attorney or attorney charged by law with the prosecution of offenses in a court or before a magistrate, or a magistrate.

(B) In all cases not provided by sections 2935.02 to 2935.08 of the Revised Code, in order to cause the arrest or prosecution of a person charged with committing an offense in this state, a peace officer or a private citizen having knowledge of the facts shall comply with this section.

(D) A private citizen having knowledge of the facts who seeks to cause an arrest or prosecution under this section may file an affidavit charging the offense committed with a reviewing official for the purpose of review to determine if a complaint should be filed by the prosecuting attorney or attorney charged by law with the prosecution of

offenses in the court or before the magistrate. A private citizen may file an affidavit charging the offense committed with the clerk of a court of record before or after the normal business hours of the reviewing officials if the clerk's office is open at those times. A clerk who receives an affidavit before or after the normal business hours of the reviewing officials shall forward it to a reviewing official when the reviewing official's normal business hours resume.

The affidavit which is properly submitted under the plain language of the statute to a judge of this Court for review and not the prosecutor's office charges Joyce Chilton with the following criminal offenses:

ORC Section 2921.13 (Perjury)

ORC Section 2913.02 (Theft)

ORC Section 2921.13 (Falsification)

ORC Section 2913.04 (Fraud)

ORC 2935 allows a trial court to issue a warrant for an arrest after a review of an affidavit proving probable cause by a private citizen. I am turning to the court as I had difficulty reporting the matter to the sheriff's office, police, probate refused to reopen the estate, and the city manager was unable to assist. My cognitive abilities are returning slowly so it is hard for me to determine if I am getting the run around because of bias or the city's lack of knowledge to my civil rights. Joyce Chilton served as a Springfield city commissioner from 2010 – 2021. I would also like the court to know that I put good effort to handle this matter privately with Joyce Chilton, who made it clear that I should pursue legal action.

Below you will find an affidavit attesting to and providing evidence supporting my allegations that Joyce Chilton committed criminal behavior as the administrator of Paul Chilton's estate who passed away on November 16, 2018 by providing statements to the probate court she knew to be untrue in order to enrich herself and cause damages to myself.

Timeline of Key Events:

1. ****November 16, 2018**** - Paul Chilton passed away. Joyce Chilton was responsible for estate matters. Paul Chilton is my father. My parents never wed and Joyce Chilton is not my mother.
2. ****Early 2019**** - Joyce claimed no valid will existed and sought to transfer estate property under intestacy laws. As a child born out of wedlock (illegitimate) intestacy laws allow me to make a claim on my father's estate.
3. January 2019 – Joyce Chilton filed an affidavit to transfer real property she held co-ownership of into her name. One of which, she specially signed away dower rights.
4. February 2019 – Joyce Chilton sought a certificate of transfer for at least 6 real properties solely titled to Paul Chilton by affirming to the court that Paul Chilton did not have children, he did not have a will, and she was a sole survivor. Joyce Chilton misrepresented the value of the estate as she would later sell the properties for more than the statutory limit (\$40,000.00) to receive summary administration from the probate court.
3. ****2020–2024**** - Allegations emerged that Joyce withheld critical estate documents, including a will that had been reportedly stored with another attorney but appears incomplete and potentially altered.
4. ****May 24, 2025**** - I received documents, including a purported 1985 will, indicating possible forgery, suppression of assets, and misrepresentation of estate rights.

Allegations and Statement of Facts:

1. ****Will Withholding**** - Joyce did not disclose the existence of a valid will for over a year, violating Ohio Revised Code (ORC) §2107.10.
2. ****Forgery and Altered Documents**** - Evidence suggests she provided a cut-and-paste will that lacked witnesses and other critical requirements, potentially making it invalid or forged.
3. ****False Claims of Intestacy**** - Joyce misrepresented estate rights, falsely asserting no will existed to justify her transfer of estate properties.
4. ****Illegal Property Transfers**** - Transferred estate assets outside proper probate and legal processes, misrepresented facts to a court and heirs raising questions of fraud and mismanagement.

5. ****Paternity and Inheritance Issues**** - Omitted disclosure of rightful heirs (out-of-wedlock children of Paul Chilton) to gain sole control of the estate.
6. ****Estate Mismanagement**** - Alleged financial misconduct and concealment of estate documents to deprive heirs of their rightful claims.
7. ****Statutory Violations**** - Actions potentially breach ORC estate laws on fraud, perjury, and will validation.

****Regarding Potential Criminal Charges Against Joyce Chilton****

The affidavit submitted by Cindy Lawson alleges several violations by Joyce Chilton related to the estate of Paul Douglas Chilton. These include:

- * ****Withholding a Will:**** Joyce Chilton presented a will dated June 27, 1985, after initially claiming Paul Chilton died intestate. This action potentially violates ORC Section 2107.10, which addresses the effect of withholding a will. The submitted will's validity is questionable, as it lacks a witness list and appears altered, and rest with a lawyer in a lock box. As the person solely in control of the document and aware of its existence she was bound to file the instrument with probate within a year of death.
- * ****Perjury and Falsification:**** In seeking a certificate of transfer, Joyce Chilton swore the decedent died intestate on February 6, 2019, despite now presenting a will. This could constitute perjury (ORC 2921.13) and falsification (ORC 2921.13) She failed to report the true value of the estate to benefit from a summary administrative review.
- * ****Fraud and Misrepresentation:**** The estate includes at least six properties deeded solely to Paul Chilton, without survivorship rights. Joyce Chilton's actions to transfer these properties to herself, while potentially misrepresenting the value of the estate to avoid taxes and fees, may constitute fraud (ORC 2913.04) Joyce Chilton affirmed during the sale of these properties that she was unaware of encumbrances related to the transfer of deeds/titles during the sale knowing full well of her deception to the probate court.
- * ****Theft:**** The cumulative actions, including potential misappropriation of estate assets exceeding \$100,000 after a true accounting of the estate, which may include full appraisals of the contested properties, income gained from renting or sale, to include evaluation of market values at the time of sale, and other assets such as vehicles and other investments, may constitute theft (ORC 2913.02)

The information regarding the child support agreement and paternity, while relevant, appears to be an attempt to undermine the claims of Paul Chilton's children as beneficiaries. Paternity has been established per birth certificates and noted in Paul Chilton's obituary. Paul Chilton had several brothers and sisters who had survivor rights to the property she had waived rights to thereby depriving them of their rights as beneficiaries of the estate. The focus remains on Joyce Chilton's potential violations related to the handling of the estate.

I am asking the court to review this case and issue an arrest warrant or refer the matter for additional investigation so that Joyce Chilton can be brought to justice and the beneficiaries can be made whole.

Cindy Lawson

A handwritten signature in blue ink, appearing to read "Cindy Lawson", written in a cursive style.

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IN THE CLARK COUNTY MUNICIPAL COURT
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MUNICIPAL COURT
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In RE: Criminal Charges

Matter NO:

Against

Mary Joyce Chilton

Judge:

AKA: Joyce Chilton

July 14, 2025

Re: AFFIDAVIT OF CINDY LAWSON

I, Cindy Lawson, being of lawful age and sound mind, do hereby swear and affirm under penalty of perjury that the following is true and correct to the best of my knowledge.

1. Introduction:

I, Cindy Lawson, am the biological daughter of Paul Douglas Chilton, who passed away on November 16, 2018, in Clark County, Ohio. Paul Douglas Chilton had three adult children with Beverly Gordon, myself being one of those children.

2. Fraudulent Representations:

- On February 6, 2019, Joyce Chilton submitted a Certificate of Transfer to the Clark County Probate Court seeking administration of properties solely owned by our father (Exhibit A).
- Joyce submitted an affidavit falsely declaring that my father died intestate and without children, knowingly excluding myself and my siblings, Sandy Anderson and Ronald Gordon.

- Evidence from correspondence (Exhibit B) reveals Joyce Chilton acknowledged our existence over the course of decades and willfully omitted our rightful status as heirs from court documents.

3. Key Facts Supporting Claims:

- **Marriage and Family History:** Joyce and Paul Chilton married in the 1970s, years after the births of his three children, whose birth certificates document him as the father. Witnesses who intermingled with the Chilton family can attest Joyce was aware we were his children and that he had publicly acknowledged this fact.
- **Omission of a Will and Subsequent Claim:** Joyce represented to the Probate Court that Paul died intestate. In May 2025, her attorney presented an old, ambiguous document and claimed it was Paul's will, violating Ohio law that mandates submission within one year of death (ORC 2107.10).

4. Refusal to Resolve and Discovery of Fraud:

- Joyce ignored multiple requests to mediate concerns about estate management. In her text messages and emails, Joyce explicitly stated, "Take me to court."
- These emails (Exhibit B) outline the timeline of when fraud was discovered, with the attorney's letter arriving on May 25, 2025, detailing the alleged existence of the will and property documentation.

5. Legal Implications and Injuries Caused:

- Joyce Chilton's affidavit directly harmed the interests of the lawful heirs by facilitating the transfer of properties under fraudulent pretenses, contrary to intestacy laws (ORC 2105.06).
- Her actions resulted in the deprivation of familial assets that have impacted my financial stability, health and access to personal belongings of sentimental value.


6. Evidence and Support:

- **Exhibit A:** Certificate of Transfer and supporting submission by Joyce Chilton.
- **Exhibit B:** Email and text communications demonstrating acknowledgment of fraud and refusal to mediate.
- **Exhibit C:** Birth certificates of Paul Chilton's children and third-party witness statements validating our family history.

7. Prayer for Justice:

I request this affidavit be considered as supporting evidence for both criminal and civil proceedings against Joyce Chilton. Her willful attempt to defraud rightful heirs, perjure herself under oath, and violate statutory obligations must not go unaddressed.

Under penalties of perjury, I declare the foregoing is true and correct.



Cindy Lawson