

15th of April, 2025 1:34:43 PM

COMMON PLEAS COURT
BERINE QUILTER
CLERK OF COURTS

IN THE COURT OF COMMON PLEAS, LUCAS COUNTY, OHIO

STATE OF OHIO

Plaintiff

CASE NO.

CR2025-00515

v.

NOTICE OF FILING INDICTMENT

Tom Ostrosky

Defendant.

Involved Agency:

Office of the Ohio Attorney General,
Charitable Law Section, 2022-000017

Thaddius Townsend

Lucas County Prosecutor's Criminal
Division

ISSUE WARRANT

Presented by: Thaddius Townsend, Ohio Attorney General Special Prosecutor

Indictment for the above captioned case has been filed with the Lucas County Clerk of Courts. Notice of filing herein contains an abbreviated summary of the indictment for the purpose of clerical intake with the Lucas County Clerk of Courts and neither replaces nor supplements the charges listed in the attached indictment.

- Count 1: Engaging in a Pattern of Corrupt Activity, O.R.C. §2923.32(A)(1), 2923.32(B)(1), F1
- Count 2: Theft From a Person in a Protected Class, O.R.C. §2913.02(A)(3), 2913.02(B)(3), F1
- Count 3: Prohibited Acts and Practices for Charities, O.R.C. §1716.14(A)(1), 1716.99(B)(4)(d), F2
- Count 4: Telecommunications Fraud, O.R.C. §2913.05(A), 2913.05(E)(1), F2

**JULIA R BATES, LUCAS COUNTY PROSECUTOR
LUCAS COUNTY, OHIO**

By: Thaddius Townsend

The State of Ohio, Lucas County.

I, the undersigned, Clerk of the Court of Common Pleas in and for said County, do hereby certify that the foregoing is a full, true and correct copy of the original indictment, with the endorsements thereon, now on file in my office.

WITNESS my hand and the seal of said Court, at Lucas County, Ohio on this ____ day of _____, _____.

J. Bernie Quilter, Clerk
By: Deputy Clerk

IN THE COURT OF COMMON PLEAS, LUCAS COUNTY, OHIO

The State of Ohio, }
County of Lucas } SS.

Grand Jury Term
JANUARY TERM

INDICTMENT

Case Number
CR2025-00515

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of Lucas County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:

Defendant	Tom Ostrosky
Count One	Engaging in a Pattern of Corrupt Activity - F1 §2923.32(A)(1), 2923.32(B)(1)
Date of Offense	On or about April 14, 2025

Tom Ostrosky on or about April 14, 2025, at the county of Lucas aforesaid, while employed by, or associated with, any enterprise did conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity or the collection of an unlawful debt, to wit: operated The Lazarus Experience and used checks, withdrawals, transfers, and other payments to deprive The Lazarus Experience and its donors of money and other assets in violation of Ohio Revised Code §2923.32(A)(1), 2923.32(B)(1), **Engaging in a Pattern of Corrupt Activity**, a felony of the first degree.

FURTHERMORE, at least one of the incidents of corrupt activity was a felony of the first, second, or third degree, aggravated murder, or murder, or at least one of the incidents was a felony under the law of this state that was committed prior to July 1, 1996, and constituted a felony of the first, second, or third degree, aggravated murder, or murder or was committed on or after July 1, 1996, or one of the incidents of corrupt activity was a felony under the law of the United States or of another state that, if committed in this state on or after July 1, 1996, would have constituted a felony of the first, second, or third degree, aggravated murder, or murder under the law of this state, to wit: Theft, §2913.02, Solicitation Fraud, §1716.14(A)(1), Telecommunications Fraud, §2913.05(A).

at least one of the incidents of corrupt activity is a felony of the first, second, or third degree, to wit: Theft, §2913.02, Solicitation Fraud, §1716.14(A)(1), Telecommunications Fraud, §2913.05(A).

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

COMMON PLEAS COURT
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Defendant	Tom Ostrosky
Count Two	Theft From a Person in a Protected Class - F1 §2913.02(A)(3), 2913.02(B)(3)
Date of Offense	On or about April 14, 2025
<p>The grand jurors further find and present that:</p> <p>Tom Ostrosky on or about April 14, 2025, at the county of Lucas aforesaid, did with purpose to deprive the owner, The Lazarus Experience and its donors, of property or services, to wit: money and other assets, knowingly obtain or exert control over either the property or services by deception in violation of Ohio Revised Code §2913.02(A)(3), 2913.02(B)(3), Theft From a Person in a Protected Class, a felony of the first degree.</p> <p>FURTHERMORE, the victim of the offense is an elderly person and the value of the property or services stolen is one hundred fifty thousand dollars or more.</p> <p>FURTHERMORE, a victim of the offense is an elderly person, and the value of the property or services stolen is one hundred fifty thousand dollars or more, to wit: checks written, withdrawals, transfers, and other payments made to deprive The Lazarus Experience and its donors of money and other assets.</p> <p>The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.</p>	

Defendant	Tom Ostrosky
Count Three	Prohibited Acts and Practices for Charities - F2 §1716.14(A)(1), 1716.99(B)(4)(d)
Date of Offense	On or about April 14, 2025
<p>The grand jurors further find and present that:</p> <p>Tom Ostrosky on or about April 14, 2025, at the county of Lucas aforesaid, while planning, conducting, or executing a solicitation of contributions for a charitable organization or charitable purpose or planning, conducting, or executing a charitable sales promotion, did commit a deceptive act or practice to wit: using donated money and other assets for personal use and not for the charitable purposes of The Lazarus Experience in violation of Ohio Revised Code §1716.14(A)(1), 1716.99(B)(4)(d), Prohibited Acts and Practices for Charities, a felony of the second degree.</p> <p>FURTHERMORE, and victim was an elderly person or disabled adult and the value of the contributions made in the violation was \$37,500 or more.</p> <p>FURTHERMORE, a victim of the offense is an elderly person, and the value of the contributions made in the violation is thirty-seven thousand five hundred dollars or more, to wit: using donated money and other assets for personal use and not for the charitable purposes of The Lazarus Experience.</p> <p>The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.</p>	

COMMON PLEAS COURT
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Defendant Tom Ostrosky
Count Four **Telecommunications Fraud - F2**
§2913.05(A), 2913.05(E)(1)
Date of Offense On or about April 14, 2025

The grand jurors further find and present that:

Tom Ostrosky on or about April 14, 2025, at the county of Lucas aforesaid, having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, telecommunication service, or voice over internet protocol service a writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud and the violation occurred as part of a course of conduct involving other violations of division (A) or (B) of section 2913.05 or violations of, attempts to violate, conspiracies to violate, or complicity in violations of section 2913.02, 2913.04, 2913.11, 2913.21, 2913.31, 2913.42, 2913.43, or 2921.13 of the Revised Code in violation of Ohio Revised Code §2913.05 (A), 2913.05(E)(1), **Telecommunications Fraud**, a felony of the second degree.

FURTHERMORE, the value of the benefit obtained by Tom Ostrosky or of the detriment to the victim of the fraud is one hundred fifty thousand dollars or more but less than one million dollars.

FURTHERMORE, the violation occurred as part of a course of conduct involving other violations of division (A) of section 2913.05 or violations of, attempts to violate, conspiracies to violate, or complicity in violations of section 2913.02, 2913.04, 2913.11, 2913.21, 2913.31, 2913.42, 2913.43, or 2921.13 of the Revised Code, and the value of the benefit obtained by the offender or of the detriment to the victim of the fraud in the violations involved in that course of conduct is one hundred fifty thousand dollars or more but less than one million dollars, to wit: using a wire and other telecommunications devices to steal money and other assets in connection with the operation of The Lazarus Experience.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

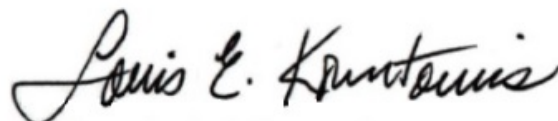
Each offense listed above is contrary to the form of the statute of the Ohio Revised Code in such case made and provided, and against the peace and dignity of the State of Ohio

A TRUE BILL



Foreperson of the Grand Jury

JULIA R BATES
LUCAS COUNTY
LUCAS COUNTY PROSECUTOR



Prosecutor or by her Assistant

NOTICE TO DEFENDANT

'2929.14(A)(3)(a) For a felony of the third degree that is a violation of section 2903.06, 2903.08, 2907.03, 2907.04 or 2907.05 of the Revised Code or that is a violation of section 2911.02 or 2911.12 of the Revised Code if the offender previously has been convicted of or pleaded guilty in two or more separate proceedings to two or more violations of section 2911.01, 2911.02, 2911.11 or 2911.12 of the Revised Code, the prison term shall be twelve, eighteen, twenty-four, thirty, thirty-six, forty-two, forty-eight, fifty-four or sixty months.

'2929.14(A)(3)(b) For a felony of the third degree that is not an offense for which division (A) (3)(a) of this section applies, the prison term shall be nine, twelve, eighteen, twenty-four, thirty, or thirty-six months.