

STATE OF OHIO,

CASE NO.

Plaintiff

VS.

**INDICTMENT**

RYAN C. NEEDELS

Defendant.

**On the term** Part II-Session II

**Count One**

*The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Ryan C Needels, on or about the 7th day of June, 2021 through the 31st day of October, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, 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: the criminal acts separately charged in Counts Two through Fifty-One of this indictment, as if fully re-written herein 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. 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: Engaging in a Pattern of Corrupt Activity.

*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.*

**Count Two**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 9th day of May, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity in violation of Ohio Revised Code §1315.55(A)(1), 1315.99(C), **Money Laundering**, a felony of the third degree.

*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.*

**Count Three**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 8th day of March, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity in violation of Ohio Revised Code §1315.55(A)(1), 1315.99(C), **Money Laundering**, a felony of the third degree.

*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.*

**Count Four**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 25th day of March, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity in violation of Ohio Revised Code §1315.55(A)(1), 1315.99(C), **Money Laundering**, a felony of the third degree.

*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.*

**Count Five**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 25th day of April, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity in violation of Ohio Revised Code §1315.55(A)(1), 1315.99(C), **Money Laundering**, a felony of the third degree.

*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.*

**Count Six**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 25th day of July, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the

purpose of committing or furthering the commission of corrupt activity in violation of Ohio Revised Code §1315.55(A)(1), 1315.99(C), **Money Laundering**, a felony of the third degree.

*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.*

#### **Count Seven**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 20th day of July, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity in violation of Ohio Revised Code §1315.55(A)(1), 1315.99(C), **Money Laundering**, a felony of the third degree.

*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.*

#### **Count Eight**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 20th day of August, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity in violation of Ohio Revised Code §1315.55(A)(1), 1315.99(C), **Money Laundering**, a felony of the third degree.

*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.*

### **Count Nine**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 7th day of June, 2021 through the 31st day of October, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, 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, or telecommunication service any writing, data, sign, signal, picture, sound, or image, to wit: phone calls, text messages, Facebook messages, and/or emails, 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) of this section 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 is one hundred fifty thousand dollars or more but less than one million dollars in violation of Ohio Revised Code §2913.05(A), 2913.05(B); 2913.05(C), **Telecommunications Fraud**, a felony of the second degree.

*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.*

### **Count Ten**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 22nd day of January, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Travis Bidwell, of property or

services, to wit: \$23,400.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

### **Count Eleven**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 22nd day of January, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Travis Bidwell, of property or services, to wit: \$23,400.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

### **Count Twelve**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 16th day of February, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, William Biles, of

property or services, to wit: \$13,100.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

### **Count Thirteen**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 16th day of February, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, William Biles, of property or services, to wit: \$13,100.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

### **Count Fourteen**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 7th day of January, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed

in Delaware County, Ohio, did with purpose to deprive the owner, Sterling Boggs, of property or services, to wit: \$15,000.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Fifteen**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 7th day of January, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Sterling Boggs, of property or services, to wit: \$15,000.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Sixteen**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 27th day of September, 2021, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Jerry Brooks, of property or services, to wit: \$95,200.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Seventeen**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 27th day of September, 2021, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Jerry Brooks, of property or services, to wit: \$95,200.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Eighteen**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 14th day of July, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Jeffrey Cole, of property or services, to wit: \$7,900.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Nineteen**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 14th day of July, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Jeffrey Cole, of property or services, to wit: \$7,900.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Twenty**

*The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Ryan C Needels, on or about the 28th day of April, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Matt Enderle, of property or services, to wit: \$19,400.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Twenty-One**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 28th day of April, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Matt Enderle, of property or services, to wit: \$19,400.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2),

**Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Twenty-Two**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 11th day of August, 2021, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Jamie Gaines, of property or services, to wit: \$14,300.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Twenty-Three**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 11th day of August, 2021, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Jamie Gaines, of property or services, to wit: \$14,300.00 U.S. CURRENCY, knowingly obtain or exert control over either the

property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

#### **Count Twenty-Four**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 14th day of April, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Shaun Holmes, of property or services, to wit: \$18,400.00 U.S.CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

#### **Count Twenty-Five**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 14th day of April, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Shaun Holmes, of property or services, to wit: \$18,400.00 U.S. CURRENCY, knowingly obtain or exert control over either the

property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

#### **Count Twenty-Six**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 7th day of June, 2021, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Joe Mentzer, of property or services, to wit: \$50,000.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

#### **Count Twenty-Seven**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 7th day of June, 2021, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Joe Mentzer, of property or services, to wit: \$50,000.00 U.S. CURRENCY, knowingly obtain or exert control over either the

property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

#### **Count Twenty-Eight**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 6th day of May, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Jennifer Mulcahy, of property or services, to wit: \$15,000.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

#### **Count Twenty-Nine**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 6th day of May, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Jennifer Mulcahy, of property or services, to wit: \$15,000.00 U.S. CURRENCY, knowingly obtain or exert control over either

the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

### **Count Thirty**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 19th day of April, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Zachary Myers, of property or services, to wit: \$29,000.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

### **Count Thirty-One**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 19th day of April, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Zachary Myers, of property or

services, to wit: \$29,000.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

### **Count Thirty-Two**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 23rd day of March, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Jerry Nye, of property or services, to wit: \$20,900.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

### **Count Thirty-Three**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 23rd day of March, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Jerry Nye, of property or

services, to wit: \$20,900.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

#### **Count Thirty-Four**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 3rd day of March, 2022 through the 13th day of September, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Brandon Petry, of property or services, to wit: \$17,900.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

#### **Count Thirty-Five**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 3rd day of March, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Brandon Petry, of property or

services, to wit: \$17,900.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

### **Count Thirty-Six**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 15th day of April, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Rachel Rhodes, of property or services, to wit: \$37,800.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

### **Count Thirty-Seven**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 15th day of April, 2022 through the 13th day of September, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to

deprive the owner, Rachel Rhodes, of property or services, to wit: \$37,800.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

### **Count Thirty-Eight**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 14th day of October, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Andrea Ross, of property or services, to wit: \$9,000.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

### **Count Thirty-Nine**

*The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Ryan C Needels, on or about the 14th day of October, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Andrea Ross, of property or services, to wit: \$9,000.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Forty**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 14th day of March, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, James Roby, of property or services, to wit: \$16,900.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Forty-One**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 14th day of March, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, James Roby, of property or services, to wit: \$16,900.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Forty-Two**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 7th day of March, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Zachary Scott, of property or services, to wit: \$16,900.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Forty-Three**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 7th day of March, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Zachary Scott, of property or services, to wit: \$16,900.00, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Forty-Four**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 5th day of August, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Robert Seely, of property or services, to wit: \$15,200.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Forty-Five**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 5th day of August, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Robert Seely, of property or services, to wit: \$15,200.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Forty-Six**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 23rd day of February, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Ty Sonagere, of property or services, to wit: \$18,100.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

### **Count Forty-Seven**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 23rd day of February, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Ty Sonagere, of property or services, to wit: \$18,100.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

### **Count Forty-Eight**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 11th day of July, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, John Verde, of property or services, to wit: \$23,200.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is

valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Forty-Nine**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 11th day of July, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, John Verde, of property or services, to wit: \$23,200.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services without the consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(1), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Fifty**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 23rd day of May, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Cheryl Roberts, of property or services, to wit: \$37,800.00 U.S. CURRENCY, 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)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is

valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**Count Fifty-One**

*The Grand Jurors further find and present:*

Ryan C Needels, on or about the 23rd day of May, 2022, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Cheryl Roberts, of property or services, to wit: \$37,800.00 U.S. CURRENCY, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent in violation of Ohio Revised Code §2913.02(A)(2), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree. The property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

*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.*

**DAVE YOST  
OHIO ATTORNEY GENERAL**



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Brian Dove (0096890)  
Associate Assistant Attorney General

**WHERE APPLICABLE, NOTICE IS HEREBY GIVEN:**

If you were on post-release control at the time these offense(s) in this particular indictment were committed, you could be subject to the additional penalty of sentence as set forth in O.R.C. 2929.141 upon conviction of, or plea of guilty to, any new felony herein.

If you are under indictment for or have been convicted of either a felony offense of violence (as defined in O.R.C. 2901.01(A)(9)) or any offense involving the illegal possession, use, sale, administration, distribution, or trafficking in any drug of abuse, you are prohibited under O.R.C. 2923.13 from knowingly acquiring, having or using any firearm or dangerous ordnance.

  
Bryan Dove (096890)  
Associate Assistant Attorney General

**A TRUE BILL**

This Bill of Indictment found upon testimony sworn and sent before the Grand Jury at the request of the Prosecuting Attorney.

  
FOREPERSON OF THE GRAND JURY