

FILED  
LUCAS COUNTY

2023 APR -6 PM 2: 56

COMMON PLEAS COURT  
BERNIE QUILTER  
CLERK OF COURT

IN THE COURT OF COMMON PLEAS, LUCAS COUNTY, OHIO

STATE OF OHIO	)	Case No: CR 202301515-000
Plaintiff	)	
v.	)	NOTICE OF FILING INDICTMENT
	)	
DOUG MILLER et al	)	Louis Kountouris, #0023692
Defendants	)	Assistant Prosecuting Attorney

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.

D-1 **DOUG MILLER**  
ORIG TRUE BILL-NO BOOK/WARRANT

ct 1	1707.44M1d	F1	UNLAWFUL SECURITIES PRACTICES - F1	F1
ct 2	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 7	2913.02A3	F4	GRAND THEFT	F4
ct 8	2913.02A3	F4	GRAND THEFT	F4
ct 9	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 10	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 11	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 12	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 13	2913.02A3	F4	GRAND THEFT	F4
ct 14	2913.02A3	F4	GRAND THEFT	F4
ct 15	2913.02A3	F4	GRAND THEFT	F4
ct 16	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 17	2913.02A3	F4	GRAND THEFT	F4
ct 18	2913.02A3	F4	GRAND THEFT	F4
ct 23	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 24	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 25	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 26	2913.02A3	F4	GRAND THEFT	F4
ct 27	2913.02A3	F4	GRAND THEFT	F4
ct 28	2913.02A3	F4	GRAND THEFT	F4
ct 29	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 30	2913.02A3	F4	GRAND THEFT	F4
ct 31	2913.02A3	F4	GRAND THEFT	F4
ct 32	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 33	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 34	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 35	2913.02A3	F4	GRAND THEFT	F4
ct 36	2913.02A3	F4	GRAND THEFT	F4
ct 37	2913.02A3	F4	GRAND THEFT	F4
ct 38	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 39	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 40	2913.02A3	F4	GRAND THEFT	F4
ct 100	1315.55A2		MONEY LAUNDERING	F3
ct 101	1315.55A2		MONEY LAUNDERING	F3
ct 102	1315.55A2		MONEY LAUNDERING	F3
ct 103	1315.55A2		MONEY LAUNDERING	F3
ct 104	1315.55A2		MONEY LAUNDERING	F3

ct 105 1315.55A2		MONEY LAUNDERING	F3
ct 106 2923.32	F1	ENGAGING IN A PATTERN OF CORRUPT ACTIVITY-F1	F1

D-2 **BRAD KONERMAN**

ORIG TRUE BILL-NO BOOK/WARRANT

ct 3	1707.44B4	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 4	1707.44G	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 5	2913.02A3	F4	GRAND THEFT	F4
ct 6	2913.05	F2	TELECOMMUNICATIONS FRAUD F2	F2
ct 106	2923.32	F1	ENGAGING IN A PATTERN OF CORRUPT ACTIVITY-F1	F1

D-3 **ADAM SALON**

ORIG TRUE BILL-NO BOOK/WARRANT

ct 3	1707.44B4	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 4	1707.44G	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 5	2913.02A3	F4	GRAND THEFT	F4
ct 6	2913.05	F2	TELECOMMUNICATIONS FRAUD F2	F2
ct 57	2913.42	F3	TAMPERING WITH RECORDS	F3
ct 58	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 106	2923.32	F1	ENGAGING IN A PATTERN OF CORRUPT ACTIVITY-F1	F1

D-4

GARY RATHBUN

ORIG TRUE BILL-NO BOOK/WARRANT

ct 7	2913.02A3	F4	GRAND THEFT	F4
ct 8	2913.02A3	F4	GRAND THEFT	F4
ct 9	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 10	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 11	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 12	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 13	2913.02A3	F4	GRAND THEFT	F4
ct 14	2913.02A3	F4	GRAND THEFT	F4
ct 15	2913.02A3	F4	GRAND THEFT	F4
ct 16	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 17	2913.02A3	F4	GRAND THEFT	F4
ct 18	2913.02A3	F4	GRAND THEFT	F4
ct 23	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 24	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 25	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 26	2913.02A3	F4	GRAND THEFT	F4
ct 27	2913.02A3	F4	GRAND THEFT	F4
ct 28	2913.02A3	F4	GRAND THEFT	F4
ct 29	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 30	2913.02A3	F4	GRAND THEFT	F4
ct 31	2913.02A3	F4	GRAND THEFT	F4
ct 32	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 33	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 34	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 35	2913.02A3	F4	GRAND THEFT	F4
ct 36	2913.02A3	F4	GRAND THEFT	F4
ct 37	2913.02A3	F4	GRAND THEFT	F4
ct 38	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 39	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 40	2913.02A3	F4	GRAND THEFT	F4
ct 100	1315.55A2		MONEY LAUNDERING	F3
ct 101	1315.55A2		MONEY LAUNDERING	F3
ct 102	1315.55A2		MONEY LAUNDERING	F3
ct 103	1315.55A2		MONEY LAUNDERING	F3
ct 104	1315.55A2		MONEY LAUNDERING	F3
ct 105	1315.55A2		MONEY LAUNDERING	F3
ct 106	2923.32	F1	ENGAGING IN A PATTERN OF CORRUPT ACTIVITY-F1	F1

## JAMES DELVERNE

ORIG TRUE BILL-NO BOOK/WARRANT

ct 7	2913.02A3	F4	GRAND THEFT	F4
ct 8	2913.02A3	F4	GRAND THEFT	F4
ct 9	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 10	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 11	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 12	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 13	2913.02A3	F4	GRAND THEFT	F4
ct 14	2913.02A3	F4	GRAND THEFT	F4
ct 15	2913.02A3	F4	GRAND THEFT	F4
ct 16	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 17	2913.02A3	F4	GRAND THEFT	F4
ct 18	2913.02A3	F4	GRAND THEFT	F4
ct 19	1707.44J	F2	UNLAWFUL SECURITIES PRACTICES F2	F2
ct 20	1707.44J	F3	UNLAWFUL SECURITIES PRACTICES F3	F3
ct 21	1707.44J	F2	UNLAWFUL SECURITIES PRACTICES F2	F2
ct 22	1707.44J	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 23	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 24	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 25	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 26	2913.02A3	F4	GRAND THEFT	F4
ct 27	2913.02A3	F4	GRAND THEFT	F4
ct 28	2913.02A3	F4	GRAND THEFT	F4
ct 29	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 30	2913.02A3	F4	GRAND THEFT	F4
ct 31	2913.02A3	F4	GRAND THEFT	F4
ct 32	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 33	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 34	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 35	2913.02A3	F4	GRAND THEFT	F4
ct 36	2913.02A3	F4	GRAND THEFT	F4
ct 37	2913.02A3	F4	GRAND THEFT	F4
ct 38	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 39	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 40	2913.02A3	F4	GRAND THEFT	F4
ct 41	1707.44J	F2	UNLAWFUL SECURITIES PRACTICES F2	F2
ct 42	1707.44J	F2	UNLAWFUL SECURITIES PRACTICES F2	F2
ct 43	1707.44J	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 44	1707.44J	F2	UNLAWFUL SECURITIES PRACTICES F2	F2
ct 45	1707.44J	F2	UNLAWFUL SECURITIES PRACTICES F2	F2
ct 46	1707.44J	F2	UNLAWFUL SECURITIES PRACTICES F2	F2
ct 47	1707.44J	F2	UNLAWFUL SECURITIES PRACTICES F2	F2
ct 48	1707.44J	F2	UNLAWFUL SECURITIES PRACTICES F2	F2
ct 49	1707.44J	F2	UNLAWFUL SECURITIES PRACTICES F2	F2
ct 50	1707.44J	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 51	1707.44J	F2	UNLAWFUL SECURITIES PRACTICES F2	F2
ct 52	1707.44J	F2	UNLAWFUL SECURITIES PRACTICES F2	F2
ct 53	1707.44J	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 54	1707.44J	F2	UNLAWFUL SECURITIES PRACTICES F2	F2
ct 55	1707.44J	F2	UNLAWFUL SECURITIES PRACTICES F2	F2
ct 56	1707.44J	F5	UNLAWFUL SECURITIES PRACTICES F5	F5
ct 57	2913.42	F3	TAMPERING WITH RECORDS	F3
ct 58	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 59	2913.42	F4	TAMPERING WITH RECORDS	F4

ct 60	2913.42	F4	TAMPERING WITH RECORDS	F4
ct 61	2913.42	F4	TAMPERING WITH RECORDS	F4
ct 62	2913.05	F2	TELECOMMUNICATIONS FRAUD F2	F2
ct 63	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 64	2913.43	F3	SECURING WRITINGS BY DECEPTION	F3
ct 65	2913.43	F3	SECURING WRITINGS BY DECEPTION	F3
ct 66	2913.02A3	F2	AGGRAVATED THEFT	F2
ct 67	2913.42	F3	TAMPERING WITH RECORDS	F3
ct 68	2913.42	F3	TAMPERING WITH RECORDS	F3
ct 69	2913.02A3	F1	AGGRAVATED THEFT F1	F1
ct 70	2913.05	F1	TELECOMMUNICATIONS FRAUD F1	F1
ct 71	2913.02A3	F2	AGGRAVATED THEFT	F2
ct 72	1315.55A3		MONEY LAUNDERING	F3
ct 73	1315.55A3		MONEY LAUNDERING	F3
ct 74	2913.05	F2	TELECOMMUNICATIONS FRAUD F2	F2
ct 75	1707.44B4	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 76	1707.44B4	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 77	1707.44G	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 78	1707.44G	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 80	1707.44B4	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 81	1707.44B4	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 82	1707.44B4	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 83	1707.44B4	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 84	1707.44G	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 85	1707.44G	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 86	1707.44B4	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 87	1707.44B4	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 88	1707.44B4	F3	UNLAWFUL SECURITIES PRACTICES F3	F3
ct 89	1707.44G	F3	UNLAWFUL SECURITIES PRACTICES F3	F3
ct 90	2913.02A3	F1	AGGRAVATED THEFT F1	F1
ct 91	2913.02A2	F1	AGGRAVATED THEFT F1	F1
ct 92	2913.02A2	F2	AGGRAVATED THEFT F2	F2
ct 93	2913.02A3	F2	AGGRAVATED THEFT	F2
ct 94	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 95	2913.02A2	F3	AGGRAVATED THEFT	F3
ct 96	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 97	2913.02A2	F3	AGGRAVATED THEFT	F3
ct 98	2913.02	F4	GRAND THEFT	F4
ct 99	2913.02A2		GRAND THEFT	F4
ct 106	2923.32	F1	ENGAGING IN A PATTERN OF CORRUPT ACTIVITY-F1	F1

D-6 COLLEEN HALL

ORIG TRUE BILL-NO BOOK/WARRANT

ct 57	2913.42	F3	TAMPERING WITH RECORDS	F3
ct 58	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 62	2913.05	F2	TELECOMMUNICATIONS FRAUD F2	F2
ct 63	2913.02A3	F3	AGGRAVATED THEFT	F3
ct 64	2913.43	F3	SECURING WRITINGS BY DECEPTION	F3
ct 66	2913.02A3	F2	AGGRAVATED THEFT	F2
ct 67	2913.42	F3	TAMPERING WITH RECORDS	F3
ct 68	2913.42	F3	TAMPERING WITH RECORDS	F3
ct 79	2921.11	F3	PERJURY	F3
ct 106	2923.32	F1	ENGAGING IN A PATTERN OF CORRUPT ACTIVITY-F1	F1

D-7 JOHN T WALTERS

ORIG TRUE BILL-NO BOOK/WARRANT

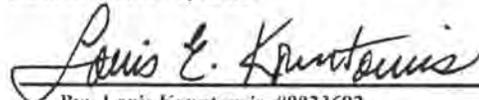
ct 71	2913.02A3	F2	AGGRAVATED THEFT	F2
ct 74	2913.05	F2	TELECOMMUNICATIONS FRAUD F2	F2
ct 75	1707.44B4	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 77	1707.44G	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 78	1707.44G	F1	UNLAWFUL SECURITIES PRACTICES F1	F1
ct 106	2923.32	F1	ENGAGING IN A PATTERN OF CORRUPT ACTIVITY-F1	F1

D-8 NANCY RATHBUN

ORIG TRUE BILL-NO BOOK/WARRANT

ct 100	1315.55A2		MONEY LAUNDERING	F3
ct 101	1315.55A2		MONEY LAUNDERING	F3
ct 102	1315.55A2		MONEY LAUNDERING	F3
ct 103	1315.55A2		MONEY LAUNDERING	F3
ct 104	1315.55A2		MONEY LAUNDERING	F3
ct 105	1315.55A2		MONEY LAUNDERING	F3
ct 106	2923.32	F1	ENGAGING IN A PATTERN OF CORRUPT ACTIVITY-F1	F1

JULIA R. BATES, PROSECUTING ATTORNEY  
LUCAS COUNTY, OHIO



By: Louis Kountouris, #0023692  
Assistant Prosecuting Attorney

THE STATE OF OHIO, LUCAS COUNTY, ss.

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

WITNESS my hand and seal of said Court at  
Toledo, Ohio, this \_\_\_\_ day of \_\_\_\_, 2023.  
J. BERNIE QUILTER, Clerk.

By: \_\_\_\_\_ Deputy

Case No: CR 202301515-000

# INDICTMENT

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THE STATE OF OHIO,  
Lucas County, } ss.

*Of the January, Term of 2023, A.D.*

**Count One**                    **Unlawful Securities Practices, §1707.44(M)(1)(d), F1**  
**Defendants**                    Doug Miller  
**Date of Offense**            On or about July 3, 2018

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Lucas County, in the State of Ohio, upon their oath do find and present that Doug Miller late of said County, on or about July 3, 2018, within the County aforesaid, in violation of 1707.44(M)(1)(d), 1707.99(E) of the Ohio Revised Code, as an investment adviser or investment adviser representative, did engage in an act, practice, or course of business that was fraudulent, deceptive, or manipulative. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

**Count Two**                    **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**                    Doug Miller  
**Date of Offense**            On or about May 26, 2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Sharon Ward, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

**Count Three**                    **Unlawful Securities Practices, §1707.44(B)(4), F1**  
**Defendants**                    Brad Konerman, Adam Salon  
**Date of Offense**            On or about May 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

**Count Four**                    **Unlawful Securities Practices, §1707.44(G), F1**  
**Defendants**                    Brad Konerman, Adam Salon  
**Date of Offense**            On or about May 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did, in purchasing or selling securities, knowingly engage in any act or practice that was, in Chapter 1707, declared illegal, defined as fraudulent, or prohibited. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

**Count Five**                    **Grand Theft, §2913.02(A)(3), F4**  
**Defendants**                    Adam Salon, Brad Konerman  
**Date of Offense**            On or about May 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Trent Redden, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

**Count Six**                    **Telecommunications Fraud, §2913.05, F2**  
**Defendants**                    Adam Salon, Brad Konerman  
**Date of Offense**            On or about May 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully 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 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.

**Count Seven**                **Grand Theft, §2913.02(A)(3), F4**  
**Defendants**                    Gary Rathbun, Doug Miller, James DeVerne  
**Date of Offense**            On or about 11/18/2016 through 11/18/2019

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Phillip and Anderson, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Phillip and Ruth Anderson---\$50,000.00

**Count Eight**            **Grand Theft, §2913.02(A)(3), F4**  
**Defendants**             Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**       On or about 8/25/2016 through 8/12/2019

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Keith Barga, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more.

**Count Nine**            **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**             Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**       On or about 7/31/2014 through 10/5/2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Dennis Barret/Barrett Trust, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars. The amount being \$420,000.00

**Count Ten**            **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**             Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**       On or about 10/2/2011 through 6/14/2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Nancy Bigelow, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars. Nancy Bigelow --\$215,000.00

**Count Eleven**        **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**             Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**       On or about 1/6/2017 through 1/27/2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Michael Black, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more. Michael Black --\$240,000.00

**Count Twelve**            **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**                Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**        On or about 6/21/2016 through 9/21/2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Kenneth Dunstan, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

Kenneth Dunstan--\$220,000.00

**Count Thirteen**        **Grand Theft, §2913.02(A)(3), F4**  
**Defendants**                Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**        On or about 8/9/2013 through 6/2/2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Paul Faykosh, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Paul Faykosh--\$105,000.00

**Count Fourteen**        **Grand Theft, §2913.02(A)(3), F4**  
**Defendants**                Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**        On or about 1/28/2014 through 8/23/2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Paul Herring, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars. The amount being \$50,000.00.

**Count Fifteen**            **Grand Theft, §2913.02(A)(3), F4**  
**Defendants**                Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**        On or about November 23, 2015

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Adrienne Seldmeier, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more.

Adrienne Seldmeier--\$60,000.00

**Count Sixteen**      **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**           Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**    On or about 4/3/2013 through 1/6/2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Thomas Farms/Michael Thomas, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Thomas Farms--\$170,000.00

**Count Seventeen**    **Grand Theft, §2913.02(A)(3), F4**  
**Defendants**           Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**    On or about June 14, 2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Sharon Ward, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more.

Sharon Ward--\$100,000.00

**Count Eighteen**    **Grand Theft, §2913.02(A)(3), F4**  
**Defendants**           Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**    On or about March 9, 2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Ellen and Thomas White, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more.

Ellen and Thomas White--\$135,000.00

**Count Nineteen**    **Unlawful Securities Practices, §1707.44(J), F2**  
**Defendants**           James DelVerne  
**Date of Offense**    On or about December 31, 2019, 2019

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the

loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

Phillip Anderson--\$50,000.00

**Count Twenty**                    **Unlawful Securities Practices, §1707.44(J), F3**  
**Defendants**                        James DelVerne  
**Date of Offense**                On or about August 25, 2019

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

Keith Barga--\$30,000.00

**Count Twenty-One**                **Unlawful Securities Practices, §1707.44(J), F2**  
**Defendants**                        James DelVerne  
**Date of Offense**                On or about October 5, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect.

Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

Dennis Barrett--\$100,000.00

**Count Twenty-Two**                **Unlawful Securities Practices, §1707.44(J), F1**  
**Defendants**                        James DelVerne  
**Date of Offense**                On or about December 31, 2019

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

Nancy Bigelow--\$175,000.00

**Count Twenty-Three**            **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**                        Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**                On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, David Augustine, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

David Augustine --\$370,000.00  
Date discovered the theft.

**Count Twenty-Four**            **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**                        Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**                On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Robert Boes, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception without the consent of the owner or person authorized to give consent. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Robert Boes--\$400,000.00  
Date discovered theft.

**Count Twenty-Five**            **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**                        Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**                On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Helen Burnard, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Helen Burnard--\$210,000.00  
Date discovered the theft

**Count Twenty-Six**            **Grand Theft, §2913.02(A)(3), F4**  
**Defendants**                        Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**                On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, John FInk, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand

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

John Fink--\$50,000.00

Date discovered the theft

**Count Twenty-Seven**

**Grand Theft, §2913.02(A)(3), F4**

**Defendants**

Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense**

On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, George Fitch, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

George Fitch--\$25,000.00

Date discovered the theft

**Count Twenty-Eight**

**Grand Theft, §2913.02(A)(3), F4**

**Defendants**

Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense**

On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, John Hill, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

John Hill--\$20,000.00

Date discovered the theft

**Count Twenty-Nine**

**Aggravated Theft, §2913.02(A)(3), F3**

**Defendants**

Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense**

On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Michael Jacobs, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Michael Jacobs--\$150,000.00

Date discovered the theft

**Count Thirty**

**Grand Theft, §2913.02(A)(3), F4**

**Defendants**

Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense**

On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Gary Kiss,

of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Gary Kiss--\$40,000.00

Date discovered the theft

**Count Thirty-One**

**Grand Theft, §2913.02(A)(3), F4**

**Defendants**

Gary Rathbun, Doug Miller, James DeVerne

**Date of Offense**

On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Dana Klein, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Dana Klein--\$50,000.00

Date discovered the theft

**Count Thirty-Two**

**Aggravated Theft, §2913.02(A)(3), F3**

**Defendants**

Gary Rathbun, Doug Miller, James DeVerne

**Date of Offense**

On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Daniel Koechel, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Daniel Koechel --\$100,000.00

Date discovered the theft

**Count Thirty-Three**

**Aggravated Theft, §2913.02(A)(3), F3**

**Defendants**

Gary Rathbun, Doug Miller, James DeVerne

**Date of Offense**

On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Todd Kurek, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Todd Kurek--\$360,000.00

Date discovered the theft

**Count Thirty-Four**                      **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**                                Gary Rathbun, Doug Miller, James DeVerne  
**Date of Offense**                      On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Gilbert Lemmerman, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Gilbert Lemmerman--\$160,000.00  
Date discovered the theft

**Count Thirty-Five**                      **Grand Theft, §2913.02(A)(3), F4**  
**Defendants**                                Gary Rathbun, Doug Miller, James DeVerne  
**Date of Offense**                      On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Robert and Valinda Milligan, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Robert and Valinda Milligan--\$10,000.00  
Date discovered the theft

**Count Thirty-Six**                      **Grand Theft, §2913.02(A)(3), F4**  
**Defendants**                                Gary Rathbun, Doug Miller, James DeVerne  
**Date of Offense**                      On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Donald Myers, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Donald Myers--\$30,000.00  
Date discovered the theft

**Count Thirty-Seven**                      **Grand Theft, §2913.02(A)(3), F4**  
**Defendants**                                Gary Rathbun, Doug Miller, James DeVerne  
**Date of Offense**                      On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, William Neiderman, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at

seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.  
William Neiderman--\$50,000.00  
Date discovered the theft

**Count Thirty-Eight**                      **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**                                      Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**                              On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Robert Newman, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.  
Robert Newman--\$180,000.00  
Date discovered the theft

**Count Thirty-Nine**                      **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**                                      Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**                              On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Sukhjit Purewal, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.  
Sukhjit Purewal--\$250,000.00  
Date discovered the theft

**Count Forty**                                      **Grand Theft, §2913.02(A)(3), F4**  
**Defendants**                                      Gary Rathbun, Doug Miller, James DelVerne  
**Date of Offense**                              On or about October 1, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Stanley Tambor, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.  
Stanley Tambor--\$100,000.00  
Date discovered the theft

**Count Forty-One**                      **Unlawful Securities Practices, §1707.44(J), F2**  
**Defendants**                                      James DelVerne  
**Date of Offense**                              On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish,

or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

David Augustine--\$75,000.00

**Count Forty-Two**                      **Unlawful Securities Practices, §1707.44(J), F2**  
**Defendants**                                James DelVerne  
**Date of Offense**                      On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

Nancy Bigelow--\$70,000.00

**Count Forty-Three**                      **Unlawful Securities Practices, §1707.44(J), F1**  
**Defendants**                                James DelVerne  
**Date of Offense**                      On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

Robert Boes--\$240,000.00

**Count Forty-Four**                      **Unlawful Securities Practices, §1707.44(J), F2**  
**Defendants**                                James DelVerne  
**Date of Offense**                      On or about December 31, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the

loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

Helen Burnard --\$80,000.00

**Count Forty-Five**                      **Unlawful Securities Practices, §1707.44(J), F2**  
**Defendants**                              James DeVerne  
**Date of Offense**                      On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

Kenneth Dunstan--\$110,000.00

**Count Forty-Six**                      **Unlawful Securities Practices, §1707.44(J), F2**  
**Defendants**                              James DeVerne  
**Date of Offense**                      On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

Paul Faykosh--\$80,000.00

**Count Forty-Seven**                      **Unlawful Securities Practices, §1707.44(J), F2**  
**Defendants**                              James DeVerne  
**Date of Offense**                      On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

John Fink--\$50,000.00

**Count Forty-Eight**  
**Defendants**  
**Date of Offense**

**Unlawful Securities Practices, §1707.44(J), F2**  
James DelVerne  
On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

Michael Jacobs--\$50,000.00

**Count Forty-Nine**  
**Defendants**  
**Date of Offense**

**Unlawful Securities Practices, §1707.44(J), F2**  
James DelVerne  
On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

Daniel Kiechel --\$50,000.00

**Count Fifty**  
**Defendants**  
**Date of Offense**

**Unlawful Securities Practices, §1707.44(J), F1**  
James DelVerne  
On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

Todd Kurek--\$250,000.00

**Count Fifty-One**                      **Unlawful Securities Practices, §1707.44(J), F2**  
**Defendants**                              James DelVerne  
**Date of Offense**                      On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

Gilbert Lemmerman--\$50,000.00

**Count Fifty-Two**                      **Unlawful Securities Practices, §1707.44(J), F2**  
**Defendants**                              James DelVerne  
**Date of Offense**                      On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

Robert Newman--\$100,000.00

**Count Fifty-Three**                      **Unlawful Securities Practices, §1707.44(J), F1**  
**Defendants**                              James DelVerne  
**Date of Offense**                      On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

Sukhjit Purewal--\$250,000.00

**Count Fifty-Four**                      **Unlawful Securities Practices, §1707.44(J), F2**  
**Defendants**                                James DelVerne  
**Date of Offense**                      On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.  
Stanley Tambor--\$100,000.00

**Count Fifty-Five**                      **Unlawful Securities Practices, §1707.44(J), F2**  
**Defendants**                                James DelVerne  
**Date of Offense**                      On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.  
Thomas Farms -100,000.00

**Count Fifty-Six**                      **Unlawful Securities Practices, §1707.44(J), F5**  
**Defendants**                                James DelVerne  
**Date of Offense**                      On or about December 31, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully with purpose to deceive, did make, issue, publish, or cause to be made, issued, or published a statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of an issuer of securities, when the defendant knew that the statement or advertisement was false in any material respect and the value of the funds or securities involved in the offense or the loss to the victim is one thousand dollars or more but less than seven thousand five hundred dollars.  
Thomas White--\$100,000.00

**Count Fifty-Seven**                      **Tampering with Records, §2913.42, F3**  
**Defendants**                                James DelVerne, Colleen Hall, Adam Salon  
**Date of Offense**                        On or about July 19, 2018

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did, knowing the defendant had no privilege to do so, and with purpose to defraud or knowing the defendant was facilitating a fraud on Transportation Alliance Bank falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Account Receivable/Invoice and the value of the data or computer software involved in the offense or the loss to the victim was one hundred fifty thousand dollars or more and/or the offense was committed for the purpose of devising or executing a scheme to defraud or to obtain property or services and the value of the property or services or the loss to the victim was seven thousand five hundred dollars or more.

TAB BANK UTAH, \$1,841,136.54 LOAN SECURED BY FORGED OR FAKE ACCOUNT RECEIVABLES

**Count Fifty-Eight**                      **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**                                James DelVerne, Colleen Hall, Adam Salon  
**Date of Offense**                        On or about July 19, 2018

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, TRANSPORTATION ALLIANCE BANK ( TAB), of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

TAB BANK LOAN SECURED BY FAKE INVOICES

**Count Fifty-Nine**                      **Tampering with Records, §2913.42, F4**  
**Defendants**                                James DelVerne  
**Date of Offense**                        On or about March 12, 2018

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did, knowing the defendant had no privilege to do so, and with purpose to defraud or knowing the defendant was facilitating a fraud on TRANSPORTATION ALLIANCE BANK falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Account Receivable/Invoice and the value of the data or computer software involved in the offense or the loss to the victim was seven thousand five hundred dollars or more and was less than one hundred fifty thousand dollars. A FORGED OR FALSIFIED DEL MONTE FOOD INVOICE \$64,800.00 DATED MARCH 12, 2018.



**Count Sixty-Three**                      **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**                                James DelVerne, Colleen Hall  
**Date of Offense**                        On or about August 16, 2018

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, WATERFORD BANK, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

STEALING \$502,870.18 FROM WATERFORD BANK TO REPAY MONEY STOLEN FROM TRANSPORTATION ALLIANCE BANK (TAB)

**Count Sixty-Four**                      **Securing Writings by Deception, §2913.43, F3**  
**Defendants**                                James DelVerne, Colleen Hall  
**Date of Offense**                        On or about August 16, 2018

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did, by deception, cause WATERFORD BANK to execute any writing that disposed of or encumbered property, or by which a pecuniary obligation was incurred and the value of the property or the obligation involved was one hundred fifty thousand dollars or more.

SECURING A REVOLVING TERM NOTE FROM WATERFORD BANK BY DECEPTION (FAKE ACCOUNT RECEIVABLES) LOAN VALUE \$2.75 MILLION AT WATERFORD

**Count Sixty-Five**                      **Securing Writings by Deception, §2913.43, F3**  
**Defendants**                                James DelVerne  
**Date of Offense**                        On or about January 6, 2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did, by deception, cause TRANSPORTATION ALLIANCE BANK (TAB) to execute any writing that disposed of or encumbered property, or by which a pecuniary obligation was incurred and the value of the property or the obligation involved was one hundred fifty thousand dollars or more.

SECURING A \$2.5 MILLION LOAN FROM TRANSPORTATION ALLIANCE BANK BY DECEPTION--FAKE ACCOUNT RECEIVABLES. THE FRAUD WAS DISCOVERED ON OR ABOUT JULY 19, 2018

**Count Sixty-Six**                      **Aggravated Theft, §2913.02(A)(3), F2**  
**Defendants**                                James DelVerne, Colleen Hall  
**Date of Offense**                        On or about August 30, 2018

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, WATERFORD BANK, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is

valued at seven hundred fifty thousand dollars or more.  
SECURING A \$1.4 MILLION LOAN FROM TAB BANK BY DECEPTION (FAKE  
ACCOUNT RECIEVABLES). HALL IS COMPLICIT.

**Count Sixty-Seven**                      **Tampering with Records, §2913.42, F3**  
**Defendants**                                James DelVerne, Colleen Hall  
**Date of Offense**                      On or about February 8, 2019

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did, knowing the defendant had no privilege to do so, and with purpose to defraud or knowing the defendant was facilitating a fraud on WATERFORD BANK falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Account Receivable/Invoice and the value of the data or computer software involved in the offense or the loss to the victim was one hundred fifty thousand dollars or more and/or the offense was committed for the purpose of devising or executing a scheme to defraud or to obtain property or services and the value of the property or services or the loss to the victim was seven thousand five hundred dollars or more.

A FORGED OR FALSIFIED DEL MONTE INVOICE (FAKE) FOR \$161,700 DATED FEBRUARY 8,2019

**Count Sixty-Eight**                      **Tampering with Records, §2913.42, F3**  
**Defendants**                                James DelVerne, Colleen Hall  
**Date of Offense**                      On or about March 22, 2019

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did, knowing the defendant had no privilege to do so, and with purpose to defraud or knowing the defendant was facilitating a fraud on WATERFORD BANK falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Account Receivable/Invoice and the value of the data or computer software involved in the offense or the loss to the victim was one hundred fifty thousand dollars or more and/or the offense was committed for the purpose of devising or executing a scheme to defraud or to obtain property or services and the value of the property or services or the loss to the victim was seven thousand five hundred dollars or more.

A FORGED OR FALSIFIED MARCH 22, 2019 DEL MONTE ACCOUNT RECEIVABLE INVOICE (FAKE) FOR \$181,500.00

**Count Sixty-Nine**                      **Aggravated Theft of One Million Five Hundred Thousand Dollars or More, §2913.02(A)(3), F1**  
**Defendants**                                James DelVerne  
**Date of Offense**                      On or about September 13, 2019

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Series 10 of Cadence Group Platform LLC, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services



**Count Seventy-Three**      **Money Laundering, §1315.55(A)(3), F3**  
**Defendants**                      James DelVerne  
**Date of Offense**                On or about December 10, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity.

AFTER RECEIVING \$614,000.00 FROM MV ST FUND 111, THE FUNDS WERE THEN TRANSFERRED BY WINDING CREEK PARTNERS TO OTHER ENTITIES CONTROLLED, OWNED OR MANAGED BY THE DEFENDANT AND HIS ASSOCIATES.

**Count Seventy-Four**      **Telecommunications Fraud, §2913.05, F2**  
**Defendants**                      James DelVerne, John T. Walters  
**Date of Offense**                On or about 10/29/2020 through 12/10/2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully 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 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.

AFTER STEALING MONEY FROM MV ST FUND III, DEFENDANTS WIRED THE FUNDS FROM WINDING CREEK PARTNERS TO OTHER ENTITIES IT OWNED, CONTROLLED OR MANAGED OR THAT THE DEFENDANT DEL VERNE, OWNED, CONTROLLED OR MANAGED.

**Count Seventy-Five**      **Unlawful Securities Practices, §1707.44(B)(4), F1**  
**Defendants**                      James DelVerne, John T. Walters  
**Date of Offense**                On or about October 30, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

PROMISSORY NOTE IN EXCESS OF \$150,000.00

**Count Seventy-Six**                      **Unlawful Securities Practices, §1707.44(B)(4), F1**  
**Defendants**                                James DelVerne  
**Date of Offense**                        On or about December 10, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.  
\$452,000.00 PROMISSORY NOTE

**Count Seventy-Seven**                **Unlawful Securities Practices, §1707.44(G), F1**  
**Defendants**                                James DelVerne, John T. Walters  
**Date of Offense**                        On or about October 29, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did, in purchasing or selling securities, knowingly engage in any act or practice that was, in Chapter 1707, declared illegal, defined as fraudulent, or prohibited. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.  
PROMISSORY NOTE IN EXCESS OF \$150,000.00

**Count Seventy-Eight**                **Unlawful Securities Practices, §1707.44(G), F1**  
**Defendants**                                James DelVerne, John T. Walters  
**Date of Offense**                        On or about December 10, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did, in purchasing or selling securities, knowingly engage in any act or practice that was, in Chapter 1707, declared illegal, defined as fraudulent, or prohibited. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.  
\$452,000.00 PROMISSORY NOTE

**Count Seventy-Nine**                **Perjury, §2921.11, F3**  
**Defendants**                                Colleen Hall  
**Date of Offense**                        On or about July 12, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did, in any official proceeding, knowingly make a false statement under oath or affirmation, or knowingly swear or affirm the truth of a false statement previously made, when either statement was material.  
Testimony under oath in an official proceeding- a hearing conducted pursuant to O.R.C. 1707.23, regarding GARD before the Ohio Division of Securities.



the victim is one hundred fifty thousand dollars or more.  
Patrick Kenney--\$250,000.00

**Count Eighty-Four**                      **Unlawful Securities Practices, §1707.44(G), F1**  
**Defendants**                                      James DelVerne  
**Date of Offense**                              On or about February 4, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did, in purchasing or selling securities, knowingly engage in any act or practice that was, in Chapter 1707, declared illegal, defined as fraudulent, or prohibited. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.  
Patrick Kenney--200,000.00 investment

**Count Eighty-Five**                      **Unlawful Securities Practices, §1707.44(G), F1**  
**Defendants**                                      James DelVerne  
**Date of Offense**                              On or about February 4, 2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did, in purchasing or selling securities, knowingly engage in any act or practice that was, in Chapter 1707, declared illegal, defined as fraudulent, or prohibited. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.  
Patrick Kenney, a second \$200,000.00 investment on February 4, 2021

**Count Eighty-Six**                      **Unlawful Securities Practices, §1707.44(B)(4), F1**  
**Defendants**                                      James DelVerne  
**Date of Offense**                              On or about December 18, 2019

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.  
John Eddingfield --\$250,000 investment

**Count Eighty-Seven**                      **Unlawful Securities Practices, §1707.44(B)(4), F1**  
**Defendants**                                      James DelVerne  
**Date of Offense**                              On or about July 10, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in

this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

John Eddingfield--\$392,756.15

**Count Eighty-Eight**                      **Unlawful Securities Practices, §1707.44(B)(4), F3**  
**Defendants**                                      James DelVerne  
**Date of Offense**                              On or about July 10, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

John Eddingfield--\$23,405.22

**Count Eighty-Nine**                      **Unlawful Securities Practices, §1707.44(G), F3**  
**Defendants**                                      James DelVerne  
**Date of Offense**                              On or about July 10, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did, in purchasing or selling securities, knowingly engage in any act or practice that was, in Chapter 1707, declared illegal, defined as fraudulent, or prohibited. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

John Eddingfield a second \$23,405.22 investment made on July 10, 2020

**Count Ninety**                                      **Aggravated Theft of One Million Five Hundred Thousand Dollars or More, §2913.02(A)(3), F1**  
**Defendants**                                      James DelVerne  
**Date of Offense**                              On or about 6/15/2020 through 1/13/2022

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Patrick Kenny, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one million five hundred thousand dollars or more.

Patrick Kenney-\$2,3000,000.00

**Count Ninety-One**                      **Aggravated Theft of One Million Five Hundred Thousand Dollars or More, §2913.02(A)(2), F1**  
**Defendants**                                James DelVerne  
**Date of Offense**                        On or about 6/15/2020 through 1/13/2022

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Patrick Kenney, of property or services, to wit: money, 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. Furthermore, the property or services stolen is valued at one million five hundred thousand dollars or more.

Patrick Kenney--\$2,300,000.00

**Count Ninety-Two**                      **Aggravated Theft, §2913.02(A)(2), F2**  
**Defendants**                                James DelVerne  
**Date of Offense**                        On or about July 10, 2022

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, John Eddingfield, of property or services, to wit: money, 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. Furthermore, the property or services stolen is valued at seven hundred fifty thousand dollars or more and less than one million five hundred thousand dollars.

John Eddingfield--\$782,817.00

**Count Ninety-Three**                      **Aggravated Theft, §2913.02(A)(3), F2**  
**Defendants**                                James DelVerne  
**Date of Offense**                        On or about July 10, 2020

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, John Eddingfield, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven hundred fifty thousand dollars or more and less than one million five hundred thousand dollars.

John Eddingfield --\$782,817.00

**Count Ninety-Four**                      **Aggravated Theft, §2913.02(A)(3), F3**  
**Defendants**                                James DelVerne  
**Date of Offense**                        On or about January 31, 2016

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Dale and Ellen Vermilya, of property or services, to wit: money, knowingly obtain or exert control over

either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

Dale and Ellen Vermilya--\$200,000

Date of discovery 4/26/2021

**Count Ninety-Five**                      **Aggravated Theft, §2913.02(A)(2), F3**

**Defendants**                                James DeVerne

**Date of Offense**                      On or about January 31, 2016

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Dale and Ellen Vermilya, of property or services, to wit: money, 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.

Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

Dale and Ellen Vermilya--\$200,000

Date of Discovery 04/26/2021

**Count Ninety-Six**                      **Aggravated Theft, §2913.02(A)(3), F3**

**Defendants**                                James DeVerne

**Date of Offense**                      On or about 10/6/2016 through 3/16/2018

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Bruce Lucki, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception.

Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

Bruce Lucki--\$500,000.00

Date of discovery 04/26/2021

**Count Ninety-Seven**                      **Aggravated Theft, §2913.02(A)(2), F3**

**Defendants**                                James DeVerne

**Date of Offense**                      On or about 10/6/2017 through 3/16/2018

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Bruce Lucki, of property or services, to wit: money, 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.

Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

Bruce Lucki--\$500,000.00

Date of discovery 04/26/2021

**Count Ninety-Eight**                      **Grand Theft, §2913.02, F4**  
**Defendants**                                      James DelVerne  
**Date of Offense**                              On or about July 1, 2014

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Clark Weidaw, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception.

Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Clark Weidaw--\$120,000.00

Date of discovery April 26, 2021

**Count Ninety-Nine**                      **Grand Theft, §2913.02(A)(2), F4**  
**Defendants**                                      James DelVerne  
**Date of Offense**                              On or about July 1, 2014

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully did with purpose to deprive the owner, Clark Weidaw, of property or services, to wit: money, 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.

Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Clark Weidaw--\$120,000.00

Date of discovery April 26, 2021

**Count One Hundred**                      **Money Laundering, §1315.55(A)(2), F3**  
**Defendants**                                      Gary Rathbun, Doug Miller, Nancy Rathbun  
**Date of Offense**                              On or about April 17, 2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully 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 intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law.

\$7,000.00 transfer from an entity to MDM LTD to Nancy Rathbun

**Count One Hundred One**                      **Money Laundering, §1315.55(A)(2), F3**  
**Defendants**                                      Gary Rathbun, Doug Miller, Nancy Rathbun  
**Date of Offense**                              On or about June 2, 2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully 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 intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law.

\$9,000.00 transfer from a company to MDM LTD to Nancy Rathbun

**Count One Hundred Two Money Laundering, §1315.55(A)(2), F3**

**Defendants** Gary Rathbun, Doug Miller, Nancy Rathbun

**Date of Offense** On or about June 29, 2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully 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 intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law.

\$9,000.00 transfer from a company to MDM LTD to Nancy Rathbun

**Count One Hundred Three Money Laundering, §1315.55(A)(2), F3**

**Defendants** Gary Rathbun, Doug Miller, Nancy Rathbun

**Date of Offense** On or about July 12, 2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully 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 intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law.

\$8,500 transfer from a company to MDM LTD to Nancy Rathbun

**Count One Hundred Four Money Laundering, §1315.55(A)(2), F3**

**Defendants** Gary Rathbun, Doug Miller, Nancy Rathbun

**Date of Offense** On or about September 1, 2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully 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 intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law.

\$8,000 transfer from a company to MDM LTF to Nancy Rathbun

**Count One Hundred Five Money Laundering, §1315.55(A)(2), F3**  
**Defendants** Gary Rathbun, Doug Miller, Nancy Rathbun  
**Date of Offense** On or about September 22, 2017

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully 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 intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law. A \$7,000.00 transaction.

**Count One Hundred Six Engaging in a Pattern of Corrupt Activity, §2923.32, F1**

**Defendants** Gary Rathbun, Doug Miller, James DeVerne, Nancy Rathbun, Colleen Hall, John T. Walters, Adam Salon, Brad Konerman

**Date of Offense** On or about 1/1/2011 through 12/31/2021

The Jurors of the Grand Jury of the State of Ohio, upon their oaths, further find that within the County aforesaid, the Defendant(s) unlawfully 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 Furthermore, the most serious offense in the pattern of corrupt activity that is the basis of the offense is a felony of the first degree, to wit:

### INTRODUCTION

During the period January 1, 2011, to December 31, 2021, the individuals listed below engaged in criminal activity by acting individually and collectively in separate but connected fraud schemes that resulted in investment fraud and theft by inducing investors to make investments into underperforming companies who provided asset-based lending, invoice factoring of receivables, and motor sports financing, without disclosing the significantly impaired financial condition of these companies. Based on the banking activity of the interrelated, underperforming companies, if a company needed funding it transferred from other companies.

The fraud scheme began when two licensed investment advisers, Douglas Miller ("Miller"), and Gary Rathbun (Rathbun"), solicited their investment advisory clients to purchase alternative investments from issuers of securities without fully disclosing their conflicts of interest related to "monitoring fees" for which they were being paid to monitor each company's performance. Rathbun and Miller were fiduciaries to their investment advisory clients, with a legal duty to act in their best interest and avoid self-dealing. As trusted fiduciaries, Rathbun and Miller were duty-bound to disclose both those conflicts and risks of the investments to protect their clients from harm. The "monitoring fees" were not fully disclosed to investors and securities regulators in contravention of federal and state securities law. In addition, the two advisors were also paid their investment advisory fees from Private Wealth Consultants ("PWC"). Rathbun and Miller had their clients invest in companies associated with North West Capital. In order to continue to raise

additional capital from investors, the managing members of the issuers including North West Capital and its related or affiliated companies created new companies for investment without disclosing to existing investors the poor financial condition of these companies and the "monitoring fees" paid to the investment advisers. Rathbun and Miller did not protect or preserve PWC client assets. Had they performed even a perfunctory due diligence review of the NWC issuing portfolio companies prior to recommending them to firm clients, Rathbun and Miller would have discovered that certain NWC deals contained material falsehoods.

In order to continue to raise more capital and continue the fraud scheme, managing members of the issuers, John Doe ("Doe") and James DelVerne ("DelVerne"), continued to solicit additional investors to invest directly with Northwest Capital Investors, LLC which they operated and controlled. They also formed Commonwealth Business Credit, LLC, and fraudulently obtained commercial financing from TAB Bank in Ogden, Utah and Waterford Bank N.A. in Toledo, Ohio. Commonwealth Business Credit, LLC also obtained financing from private credit lending firm Percent (fka Cadence) of New York City.

This securities fraud and theft case involves the managing members of the issuers, "Doe" and DelVerne, who certified false values of investments in the issuing companies to the third-party IRA custodians, Millennium Trust Company ("MTC") and Pacific Premier Trust Company ("PPT") (fka Pensco Trust Company) who administered and maintained investor investment accounts. "Doe" and DelVerne as managing members of the issuers and sponsors were required to certify the values of the alternative investments with the third-party IRA custodians at least annually. These false values were used to issue annual statements to investors, which lulled them into a false sense of security that their investments had value, and which allowed the scheme to continue for years without detection.

The criminal activity subject to this indictment began in 2011 when King's Pointe Leasing, LLC ("KPL") and Briarfield Capital, LLC ("BFC") began paying "monitoring fees" through to Private Wealth Consultants, LTD, ("PWC") and MDM, LTD ("MDM") which was equally owned and managed by Miller and Nancy Rathbun. KPL and BFC were owned, operated, and managed by "Doe" and DelVerne. The monitoring fees were paid to PWC and to MDM. MDM paid Nancy Rathbun for which Nancy did not perform any of the services. These "monitoring fees" were illegal because these fees were in addition to Miller and Rathbun's client advisory fees and this additional remuneration was not disclosed to their clients who they sold alternative investments through private placements. This was also illegal because Private Wealth Consultants, ("PWC") was contractually being paid investment advisory fees by their clients to manage their investment advisory accounts. The PWC clients who purchased these alternative investments sponsored and managed by NWC were not told by the issuing companies that Miller and Rathbun were being compensated for monitoring fees in addition to their advisory fees.

A Financial Industry Regulatory Authority ("FINRA") investigated the practices of Miller, Rathbun and PWC, and its investigation revealed that,

"During the period July 2010 until June 2014, the Respondents participated in the sale of investments in six related limited liability companies ("the LLC's") to clients of their registered investment adviser, PWC. Collectively, they sold approximately

\$25.5 million of investments in the LLC's to approximately 300 accounts tied to 187 unique clients. This included sales of approximately \$3.3 million to 25 PWC customers who were also customers of their broker-dealer, Triad. The Respondents also sold \$546,000 in other private investments to 17 PWC clients. Although the Respondents disclosed their ownership and operation of PWC to Triad, they failed to provide written notice of their participation in these sales of private securities investments to the broker-dealer. In addition, they made investments, either directly or on behalf of family members, totaling \$230,000 in some of the same LLC's without providing written disclosure to Triad. Finally, the Respondents failed to disclose to Triad that they were paid \$500 per hour by some of the LLC's for monitoring their activities, including making decisions about the business the LLC's engaged in. By virtue of this conduct, the Respondents violated NASO Rules 3030 and 3040 and FINRA Rules 3270 and 2010."

During the period from 2011 to 2017 the "monitoring fees" paid by the issuing portfolio companies managed by John Doe and James DelVerne to companies, Private Wealth Consultants, LTD and MDM LTD. MDM LTD was or is a company which was set up in the name of Gary Rathbun's wife Nancy Rathbun. Funds were paid to MDM LTD by "Doe" and DelVerne then paid to Miller, and Nancy Rathbun. MDM LTD was managed by Douglas Miller and Gary Rathbun. Nancy Rathbun was aware that she was receiving these monies. The sum of monitoring fees received during this period of time by the group totaled over \$1.3 million, 21% of which, was received by Rathbun's wife.

Following the acceptance by Miller and Gary L. Rathbun ("Rathbun") of the FINRA Letter of Acceptance, Waiver and Consent ("AWC"), the Ohio Division of Securities conducted its own administrative inquiry into the practices of PWC that resulted in a Division Final Order issued on June 13, 2018, that found Miller and Rathbun to not be "of good business repute" and to also have engaged in conduct which reflected on their "reputation for honesty, integrity, and competence in business."

After the administrative Final Order was issued, the Division began a criminal investigation and determined that there were investors who made 741 alternative investments totaling approximately \$44 million with 7 issuing companies sponsored and managed by "Doe" and DelVerne. These investments were sold by former PWC investment advisors Rathbun and Miller.

During the period January 15, 2011, through November 16, 2014, there were 44 investments totaling \$5 million made with NWCI. These investors received promissory notes with rates exceeding the normal borrowing rates during that time period. Without disclosing the "beneficial ownership" and management of more than seven other issuing portfolio companies from which they derived management and administrative fees. "Doe" and DelVerne were not transparent in disclosing to all investors that their money would be transferred to the other related companies as "illicit financing" which could and did result in uncollectible debts of those entities. The lack of disclosing the "beneficial ownership" and "conflicts of interest" along with self-dealings related to the sources and uses of investor funds would have been material information to the investors. Investor funds were commingled among all the other issuing portfolio companies they managed and operated. This movement of funds between related companies resulted in misuse of the investors'

funds. Funds were transferred between factoring receivables and asset-based lending companies to motor sports financing companies and vice versa. Investors were not told of the shortfalls or the relationship between the Investment Advisors and the companies.

## **THE ENTERPRISE**

This Enterprise is an association and/or organization and/or a group of persons and/or companies associated in fact, although not a legal entity, including but not limited to John Doe, James DelVerne, Doug Miller, Gary Rathbun, Nancy Rathbun, John Walters, Colleen Hall, Adam Solon, Brad Konerman, Briarfield Capital, Thunderroad Partners, TRF Fund 1, TRF Fund 2, Kings Point Leasing, Winding Creek Partners, North West Capital and others known and not known all of whom are persons associated with the Enterprise (collectively, "Persons associated with the Enterprise" or "Persons"). This Enterprise existed as an "Association in Fact Enterprise" under R.C. Section 2932.32 because it: (1) was an ongoing organization with a commonality of purpose or a guiding mechanism to direct the organization or (2) was a continuing unit with an ascertainable structure and/or (3) had an organizational structure that was distinct from the pattern of predicate acts. As an alternative to point (3), this Enterprise is an illicit enterprise under R. C. Section 2932.32 because it had an organizational structure distinct from the pattern of predicate acts whether or not this enterprise performed any legal acts. The persons and/or companies associated with the Enterprise performed, from time to time, some lawful acts while working for entities connected with the Enterprise, and as a result, this Enterprise existed separate and apart from the pattern of corrupt activity described in this Indictment.

### **A. THE PARTIES**

John Doe, James DelVerne, Doug Miller, Gary Rathbun, Nancy Rathbun, John Walters, Colleen Hall, Adam Solon, Brad Konerman are the natural persons associated with this enterprise. Briarfield Capital, Thunderroad Partners, TRF Fund 1, TRF Fund 2, Kings Point Leasing, Winding Creek Partners, North West Capital are entities owned, controlled or managed by some of the natural persons. Hall and Walters were employed by North West Capital. All are key persons involved in two or more events that constitute a Pattern of Corrupt Activity as described in this indictment as were persons along with others named and described herein were associated with this Enterprise

### **B. THE PLAN OF THE ENTERPRISE AND ITS HEIRARCHY**

Miller, Rathbun drew investors to North West Capital which was managed, owned and or operated by " Doe" and Delverne. Miller and Rathbun had been associated with Private Wealth Management and they directed these investors from Private Wealth to North West Capital. At North West Capital investor funds were placed into the following companies at the direction of " Doe" and Delverne:

- Thunderroad Partners
- TRF Fund 1
- TRF Fund 2
- Kings Point Leasing

Winding Creek Partners  
Thunderroad Financial

In addition to this “Doe” and DelVerne owned, operated or managed an entity called Commonwealth Business Credit. CBC operated from its principal office located at 7644 Kings Pointe Road, Toledo, Lucas County, Ohio, 43617, and was formed on September 15, 2016, by DelVerne and Salon each being 50% members. On January 1, 2018, Salon’s CBC’s 50% membership was transferred to “Doe”. CBC’s operating agreement stated, “The purpose of the Company is to manage and provide financial services to business clients, and related activities.” WCP was another entity owned, managed, or operated by “Doe” and DelVerne. Further when it was formed, by and among Winding Creek Management, LLC, an Ohio limited liability company, as the general partner together with other Persons who become Limited Partners. “Doe” signed on behalf of the general partner Winding Creek Management as the corporate secretary. He also signed on behalf of the Limited Partners as the corporate secretary. WCP’s stated purpose in its Operating Agreement is:

“The principal purposes of the Partnership are (a) to negotiate, purchase, hold for investment, vote, manage and dispose of a diversified portfolio of Investments primarily in the commercial financing sector, including accounts receivable financing, asset based lending, commercial paper, and in warrants and other equity Securities related to such commercial debt instruments, issued by small to low-middle market corporations, limited liability companies, partnerships and other entities (each of which is referred to herein as a "Portfolio Company" and all of which collectively are referred to herein as "Portfolio Companies"), with the objective of providing the Partners with a preferred return and long-term capital appreciation from such Investments; and (b) to engage in such other activities incidental to the foregoing as the General Partner deems necessary, advisable or convenient. The Partnership shall have the power and authority to carry on and engage in any other activity ancillary or incidental to the foregoing purposes that is allowed under the laws of the State of Ohio.

As early as April, June, and August of 2011, according to the Kings Point Cash “KPC Cash Estimates” (“KPCCE”) which were spreadsheets prepared and authored by James DelVerne there were cash short-falls which were evidenced by the “Total Projected Cash Estimates” which were not sufficient to re-pay their “Total Near-Term Obligations”. For Example: On August 17, 2011, the KPCCE spreadsheet revealed that the “Total Near-Term Obligations” were in excess of the “Total Projected Cash” by more than \$4.1 million. From this day forward, “The Projected Cash” amount was never sufficient to re-pay the “Total Near-Term Obligations” and the “Total Long-Term Obligations”. Because the entities listed on the KPCCE were not generating enough profit to satisfy the KPCCE “Total Near-Term Obligations” and the “Total Long-Term Obligations”, any new investor money or commercial funding would have to be used to maintain current interest payments to investors as part of an ongoing “Ponzi” scheme for all the related issuing “portfolio companies” owned, operated, and managed by “Doe” and DelVerne and listed on the KPCCE. Investors were never made aware of the true financial condition of Kings Point.

The KPCCE encompass the time period from April 4, 2011 to December 18, 2013. Beginning with the KPCCE dated October 26, 2011, a label was added to the KPCCE spreadsheet titled "Total Needed" and the amount reflected the difference between "Total Projected Cash" and "Total Near-Term Obligations." The amount was a cash short fall of \$1,350,456.32. The last KPCCE dated December 18, 2013, reflected the difference between "Total Projected Cash" and "Total Near-Term Obligations" as a cash short fall of \$6,724,511.01. The investigation further revealed that the defendants possessed a past due list containing 70 entries of individuals or entities that were owed a total of \$16,203,000, with maturity dates as early as June 15, 2015 and indications that some notes issued and executed as early as 2010. Investors were not told or informed of the fact that Kings Point as well as other companies investments were made in could not meet financial obligations.

In need of capital to pay interest payments to investors "Doe" and DelVerne sought out commercial lenders for financial assistance. To secure loans or lines of credit from commercial lenders "Doe", Delverne and others at North West Capital created and then uttered forged or fake invoices/accounts receivables to these lenders the first of which was Transportation Alliance Bank (TAB) of Utah. The account receivables invested in by TAB aged out quickly. Upon investigating the account receivables TAB realize that the Account Receivables were actually fake. TAB demanded repayment. To secure repayment "Doe", Delverne and others drew upon a line of credit at Waterford Bank in Lucas County, Ohio. The same fake account receivables were used to secure this line of credit and to repay TAB. In need of additional sources of revenue to continue to make interest payments to investors financing was secured through a private equity firm called Cadence out of New York New York. Additional scams were thought out and executed by the group to continue to be able to make payments to investors.

The total amount of all of the fraud was in excess of Seventy-Two Million (\$72,000,000.00) dollars

Within the scope of the enterprise and to further it affairs during the period January 1, 2011, to December 31, 2021, the individuals listed herein engaged in criminal activity by acting individually and collectively in separate but connected fraud schemes that resulted in investment fraud and theft by inducing investors to make investments into underperforming companies who provided asset-based lending, invoice factoring of receivables, and motor sports financing, without disclosing the significantly impaired financial condition of these companies. Based on the banking activity of the interrelated, underperforming companies, if a company needed funding it transferred from other companies.

Within the scope of the enterprise and to further it affairs the managing members of the issuers, "Doe" and DelVerne, certified false values of investments in the issuing companies to the third-party IRA custodians, Millennium Trust Company ("MTC") and Pacific Premier Trust Company ("PPT") (fka Pensco Trust Company) who administered and maintained investor investment accounts. "Doe" and DelVerne as managing members of the issuers and sponsors were required to certify the values of the alternative investments with the third-party IRA custodians at least annually. These false values were used to issue annual statements to investors, which lulled them into a false sense of security that their investments had value, and which allowed the scheme to continue for years without detection.

Within the scope of the enterprise and to further it affairs two licensed investment advisers, Douglas Miller ("Miller"), and Gary Rathbun (Rathbun"), solicited their investment advisory clients to purchase alternative investments from issuers of securities without disclosing their conflicts of interest related to "monitoring fees" for which they were being paid to monitor each company's performance. The "monitoring fees" were not disclosed to investors and securities regulators in contravention of federal and state securities law.

Within the scope of the enterprise and to further it affairs the two advisers were also paid their investment advisory fees from Private Wealth Consultants C"PWC").

Within the scope of the enterprise and to further it affairs in order to continue to raise additional capital from investors, the managing members of the issuers created new companies for investment without disclosing to existing investors the poor financial condition of these companies and the "monitoring fees" paid to the investment advisers. Rathbun and Miller did not protect or preserve PWC client assets. Had they performed even a perfunctory due diligence review of the NWC issuing portfolio companies prior to recommending them to firm clients, Rathbun and Miller would have discovered that certain NWC deals contained material falsehoods.

Within the scope of the enterprise and to further it affairs in order to continue to raise more capital and continue the fraud scheme, managing members of the issuers, John Doe ("Doe") and James DelVerne ("DelVerne"), continued to solicit additional investors to invest directly with Northwest Capital Investors, LLC which they operated and controlled.

Within the scope of the enterprise and to further it affairs they formed Commonwealth Business Credit, LLC, and fraudulently obtained commercial financing from TAB Bank in Ogden, Utah and Waterford Bank N.A. in Toledo, Ohio. Commonwealth Business Credit, LLC also obtained financing from private credit lending firm Percent (fka Cadence) of New York City.

Within the scope of the enterprise and to further its affairs fraudulent or fake invoiced were created on a computer by members of this enterprise and used to obtain bank loans and other financing so that interest payments could be continued to be made to investors.

Within the scope of the enterprise and to further it affairs from 2011 to 2017 the "monitoring fees" paid by the issuing portfolio companies managed by John Doe and James DelVeme to companies, Private Wealth Consultants, LTD and MDM LTD. MDM LTD was or is a company which was set up in the name of Gary Rathbun's wife Nancy Rathbun. Funds were paid to MDM LTD by "Doe" and Delverne then paid to Miller, and Nancy Rathbun. MDM LTD was managed by Douglas Miller and Gary Rathbun. Nancy Rathbun was aware that she was receiving these monies. The sum of monitoring fees received during this period of time by the group totaled over \$1.3 million, 21% of which, was received by Rathbun's wife as seen below:

1/5/2017	\$17,000.00 Nancy Rathbun MDM LTD. Signature Bank 3186 Miller
3/1/2017	8,000.00 Nancy Rathbun MDM LTD. Signature Bank 3190 Stub
3/20/2017	5,000.00 Nancy Rathbun MDM LTD. Signature Bank 3192 Stub
4/17/2017	7,000.00 Nancy Rathbun MDM LTD. Signature Bank 3194 Miller

6/2/2017	9,000.00	Nancy Rathbun MDM LTD. Signature Bank 3197 Miller
6/29/2017	9,000.00	Nancy Rathbun MDM LTD. Signature Bank 3198 Miller
7/12/2017	8,500.00	Nancy Rathbun MDM LTD. Signature Bank 3200 Miller
9/1/2017	8,000.00	Nancy Rathbun MDM LTD. Signature Bank 3202 Miller
9/22/2017	7,000.00	Nancy Rathbun MDM LTD. Signature Bank 3204 Stub
3/2/2016	15,000.00	Nancy Rathbun MDM LTD. Signature Bank 3157 Miller
9/8/2016	6,000.00	Nancy Rathbun MDM LTD. Signature Bank 3176 Miller
10/4/2016	15,000.00	Nancy Rathbun MDM LTD. Signature Bank 3178 Miller
12/9/2016	11,000.00	Nancy Rathbun MDM LTD. Signature Bank 3184 Miller
10/4/2015	13,000.00	Nancy Rathbun MDM LTD. Signature Bank 3144 Miller
12/31/2015	5,000.00	Nancy Rathbun MDM LTD. Signature Bank 3148 Miller
8/21/2014	10,000.00	Nancy Rathbun MDM LTD. Signature Bank 3105 Miller
10/16/2014	10,000.00	Nancy Rathbun MDM LTD. Signature Bank 3114 Miller
12/5/2013	7,000.00	Nancy Rathbun MDM LTD. Signature Bank 3095 Miller
12/3/2013	5,000.00	Nancy Rathbun MDM LTD. Signature Bank 3093 Miller
2/6/2012	13,000.00	Nancy Rathbun MDM LTD. Signature Bank 3041 Miller
3/2/2011	5,000.00	Nancy Rathbun MDM LTD. Signature Bank 3011 Miller
3/2/2011	15,000.00	Nancy Rathbun MDM LTD. Signature Bank 3012 Miller
8/1/2012	10,000.00	Nancy Rathbun MDM LTD. Signature Bank 3051 Miller

Within the scope of the enterprise and to further its affairs from January 15, 2011, through November 16, 2014, there were 44 investments totaling \$5 million made with NWCI. These investors received promissory notes with rates exceeding the normal borrowing rates during that time period.

Within the scope of this enterprise and to further its affairs from January 15, 2011 to November 16, 2014 without disclosing the “beneficial ownership” and management of more than seven other issuing portfolio companies from which they derived management and administrative fees, “Doe” and DelVerne were not transparent in disclosing to all investors that their money would be transferred to the other related companies as “illicit financing” which could and did result in uncollectible debts of those entities. The lack of disclosing the “beneficial ownership” and “conflicts of interest” along with self-dealings related to the sources and uses of investor funds would have been material information to the investors.

Within the scope of the enterprise and to further its affairs Investor funds were comingled among all the other issuing portfolio companies they managed and operated. This movement of funds between related companies resulted in misuse of the investors’ funds. Funds were transferred between factoring receivables and asset-based lending companies to motor sports financing companies and vice versa. Investors were not told of the shortfalls or the relationship between the Investment Advisors and the companies.

Within the scope of the enterprise and to further its affairs there were investors who made 741 alternative investments totaling approximately \$44 million with 7 issuing companies sponsored and/or managed by “Doe” and DelVerne. These investments were sold by former PWC investment advisors Rathbun and Miller.

Within the scope of this enterprise and to further its affairs, investments were made in a factoring scheme without investment advisors disclosing material facts to investors about the businesses doing the factoring.

Within the scope of this enterprise and to further its affairs managing members of the issuers, “Doe” and DelVerne, certified false values of investments in the issuing companies to the third-party IRA custodians, Millennium Trust Company (“MTC”) and Pacific Premier Trust Company (“PPT”) (fka Pensco Trust Company) who administered and maintained investor investment accounts.

Within the scope of this enterprise and to further its affairs “Doe” and DelVerne as managing members of the issuers and sponsors and who were required to certify the values of the alternative investments with the third-party IRA custodians at least annually. Doe and DelVerne lied about the true value of the alternative investments causing these false values to be used to issue annual statements to investors, which lulled them into a false sense of security that their investments had value, and which allowed the scheme to continue for years without detection.

### **C. COMMON PURPOSE OF THE ENTERPRISE**

This Enterprise functioned as an ongoing organization with commonality of purpose or a guiding mechanism to direct the organization. From at least January 1, 2011, to December 31, 2021 the common purpose of the Enterprise regarding its ongoing illegal conduct was to obtain money or investments by deception from people/investors so that members of the enterprise could personally profit from the investment, so that members of the enterprise could divert money to an unintended use, or so that other debts of members of the enterprise could be paid, and to pay other persons monies owed to them, to fund organizations unknown to victims. Members of the criminal enterprise lied about the true value of the alternative investments causing these false values to be used to issue annual statements to investors, which allowed the scheme to continue for years without detection. Additional member(s) of the criminal enterprise made false statements to investigators investigating the activities of the enterprise and those within it in an attempt to cover up acts committed.

As stated above, each Person Associated with the Enterprise performed separate acts on behalf of and in furtherance of the Enterprise. The persons associated with this enterprise were members of other entities so they needed to act in a structured and in an organized manner to enable the overall organization to successfully complete these schemes. Likewise, this occurred with the knowledge and/or support of other Persons Associated with the Enterprise in order that this Enterprise, as an association in fact, could continue and thrive because of the activities of each of the persons of the Enterprise

This Enterprise functioned as a continuing unit with an ascertainable structure while it was engaging in the diverse forms of illegal activities. In doing so from the time stated herein, the Persons Associated with the Enterprise participated in and/or managed the affairs of the Enterprise as previously stated. As such, these persons provided continuity and structure to the Enterprise in order to accomplish its illegal purposes—the pattern of corrupt activity as set forth in this count. This enterprise and the Persons Associated with the Enterprise were joined in purpose over a period

of time, with various roles that were different, and with methods that changed in order to accomplish the main purpose of the Enterprise.

The structure of the organization, as an Enterprise in fact: Miller and Gary Rathbun directed persons who had invested with them at Private Wealth Management to invest with North West Capital and companies associated with North West. Miller and Gary Rathbun failed to disclose the "fees" they were receiving or the true financial condition of North West Capital and or the entities associated with North West where the money was actually invested. Once invested, a third party organizations or companies became the administrator or the investment accounts maintain the figures in an investment account as supplied to it by North West. "Doe" and DelVerne who controlled the investors' money provide false information to the third-party administrator who unwittingly provided the false information to the investor leading the investor to believe that he or she had X dollars in their investment account when in fact the investor had a lesser amount or W dollars in the account. DelVerne, "Doe" and others at North West solicited and received loans from banks or lending institution so that interest payments could be made to investors, using false invoices or accounts receivable to secure a particular loan.

This Enterprise is comprised of the Persons Affiliated with the Enterprise, all of whom acted with the purpose described in this Indictment, and all of whom conducted their activities over a period of time for a common purpose. This Enterprise as an informal association comprised of the Persons Associated with the Enterprise functioned as a continuing unit, separate from the pattern of activity in which it engaged because one or more persons associated with this Enterprise performed legal acts as described herein. The non-exclusive list of lawful activities described herein occurred while this Enterprise functioned as a continuing unit and with an organization structure which engaged in diverse forms of illegal activities as stated in this Indictment.

This Enterprise also consisted of natural people and a corporations or companies. While the persons Associated with the Enterprise may have performed, from time to time, some lawful acts as described above, while working for entities connected with the Enterprise, these Persons, however, also performed illegal acts as part of and in furtherance of this Enterprise, as stated in this Indictment. Based on the foregoing, this Enterprise existed separate and apart from the pattern of corrupt activity in which it was engaged, and this Enterprise functioned as a continuing unit by engaging in the diverse forms of illegal activities, as stated in this Indictment.

In the alternative, this Enterprise is an "illicit enterprise" under R. C. Section 2932.32 which is one that is unlawful or engaged in prohibited activities. The schemes described in this indictment constitute prohibited activities. This illicit enterprise existed separate and apart from the pattern of corrupt activity as described in this Indictment even if it did not do legal transactions during this time period.

As a result of either one of these two situations, this Enterprise functioned as an organizational structure and as a continuing unit, even though it was engaging in the diverse forms of illegal activities as described in this Indictment. In either situation, the persons associated with the Enterprise participated in and/or managed the affairs of the Enterprise and as such provided continuity and structure to the Enterprise in order to accomplish its illegal purpose—the pattern of corrupt activity explained in this count. This enterprise and the persons associated within it were

joined in purpose over a period of time, although their various roles were different in order to accomplish the main purpose of the Enterprise. All these schemes were necessary to make the overall organization successful as an Enterprise engaged in corrupt activity. These activities occurred with the knowledge and or support of and or were aided or abetted by each of the persons associated with the Enterprise.

**D. AFFAIRS OF THE ENTERPRISE:** The affairs of the Enterprise involve the jurisdiction of the State of Ohio and took place in Lucas County, Hamilton County and counties surrounding the same in the State of Ohio, and in other States, including but not limited to: Michigan, Texas, Utah, New York, and include but are not limited to:

1. Did conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property.
2. Did with purpose to deprive the owner of property or services, 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 when the amount involved was greater than \$7,500.00
3. Did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services, by deception when the amount involved was greater than \$7,500.00.
4. Did having devised a scheme to defraud, shall knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.
5. Did knowingly make or cause to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, when selling any securities in Ohio.
6. Did knowing the person has no privilege to do so, and with purpose to defraud or knowing that the person is facilitating a fraud, shall do any of the following:(1) Falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record;(2) Utter any writing or record, knowing it to have been tampered with as provided in division (A)(1) of this section.
7. Did in an official proceeding, shall knowingly make a false statement under oath or affirmation, or knowingly swear or affirm the truth of a false statement previously made, when either statement is material.
8. Did by deception, shall cause another to execute any writing that disposes of or encumbers property, or by which a pecuniary obligation is incurred when the value of the property or the obligation involved is one hundred fifty thousand dollars or more, securing writings by deception is a felony of the third degree.

## **E. THE PATTERN OF CORRUPT ACTIVITY FROM July 8, 2016 to March 1, 2019**

A "Pattern of corrupt activity" means two or more incidents of corrupt activity, whether or not there has been a prior conviction, that are related to the affairs of the same enterprise, are not isolated, and are not so closely related to each other and connected in time and place that they constitute a single event. On two or more occasions, Person Associated with the Enterprise directly or indirectly committed one or more of the following:

1. MONEY LAUNDERING R.C. 1355.15(a) (2): No person shall conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property.
2. THEFT, 2913.02 No person with purpose to deprive the owner of property or services, 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, when the amount involved was \$7,500.00 or more.
3. THEFT, 2913.02 No person with purpose to deprive the owner, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception when the amount involved was \$7,500.00 or more
4. TELECOMMUNICATIONS FRAUD: 2913.05 No person did having devised a scheme to defraud, shall knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.
5. FALSE REPRESENTATION IN THE SALE OF A SECURITY 1707.44 (B)(4): No person shall knowingly make or cause to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, when selling any securities in Ohio when the amount exceeded one hundred thousand dollars.
6. TAMPERING WITH RECORDS: 2913.42. (A) No person, knowing the person has no privilege to do so, and with purpose to defraud or knowing that the person is facilitating a fraud, shall do any of the following:(1) Falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record;(2) Utter any writing or record, knowing it to have been tampered with as provided in division (A)(1) of this section.
7. PERJURY: 2929.11 No person, in any official proceeding, shall knowingly make a false statement under oath or affirmation, or knowingly swear or affirm the truth of a false statement previously made, when either statement is material.
8. SECURING WRITINGS BY DECEPTION 2913.43 (A) No person, by deception, shall cause another to execute any writing that disposes of or encumbers property, or by which a pecuniary

obligation is incurred when the value of the property or the obligation involved is one hundred fifty thousand dollars or more.

**F. INCIDENTS OF CORRUPT ACTIVITY —predicate acts as defined in R.C. Section 2923.31.**

The grand jurors find that at least one of the incidents of corrupt activity contained within this court is a felony of the first degree as a stand alone count.

INCIDENTS OF CORRUPT ACTIVITY ONE THROUGH 742.  
 THE FOLLOWING SPREADSHEET LIST 742 INCIDENTS OF CORRUPT ACITVITY WITH THE CORRUPT ACTIVITY BEING FALSE REPORESENATION IN THE SALE OF A SECURITY FOR EACH INVESTMENT LISTED:

**INCIDENTS ONE-SEVEN HUNDRED FORTY-TWO: STATE OF OHIO V. James Delverne, Gary Rathbun, Doug Miller** who did on the date listed within the body of the below spreadsheet in Lucas County, Ohio knowingly make or cause to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, when selling any securities in Ohio when the amount involved is listed below as investment amount and when such amount is less than one thousand dollars(F5), or one thousand dollars or more but less than seven thousand five hundred dollars(F4), or is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars(F3), or is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars(F2), or is one hundred fifty thousand dollars or more(F1).

Investor	Date of Investment	Investment Amt	Year-Month	Year	Issuing Entity
American Endowment Foundation	12/19/2012	\$ 100,000.00	2012-12	2012	Briarfield Capital
Apanaitis, Barbara	7/15/2013	50,000.00	2013-07	2013	Briarfield Capital
Ardner, Charles & Linda / The Ardner Trust	6/27/2013	50,000.00	2013-06	2013	Briarfield Capital
Ardner, Charles & Linda / The Ardner Trust	7/8/2013	50,000.00	2013-07	2013	Briarfield Capital
Ardner, Charles & Linda / The Ardner Trust	8/14/2014	50,000.00	2014-08	2014	Briarfield Capital
Augustine, David / Florence Augustine Family Trust	3/27/2015	50,000.00	2015-03	2015	Briarfield Capital
Augustine, David / Florence Augustine Family Trust	4/24/2015	20,000.00	2015-04	2015	Briarfield Capital
Barber, Kelly	10/21/2014	50,000.00	2014-10	2014	Briarfield Capital

Barrett, Dennis / Barrett, Greta / Barrett Family Trust	10/31/2013	100,000.00	2013-10	2013	Briarfield Capital
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	12/27/2013	50,000.00	2013-12	2013	Briarfield Capital
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	2/24/2014	50,000.00	2014-02	2014	Briarfield Capital
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	7/31/2014	55,000.00	2014-07	2014	Briarfield Capital
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	1/15/2015	60,000.00	2015-01	2015	Briarfield Capital
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	6/4/2015	55,000.00	2015-06	2015	Briarfield Capital
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	1/25/2018	50,000.00	2018-01	2018	Briarfield Capital
Bechstein, Loren & Ellen	3/22/2013	10,000.00	2013-03	2013	Briarfield Capital
Bechstein, Loren & Ellen	5/24/2013	100,000.00	2013-05	2013	Briarfield Capital
Bechstein, Loren & Ellen	12/16/2014	10,000.00	2014-12	2014	Briarfield Capital
Bechstein, Loren & Ellen	4/13/2016	10,000.00	2016-04	2016	Briarfield Capital
Bigelow, Nancy	3/25/2013	70,000.00	2013-03	2013	Briarfield Capital
Blaine, James	12/19/2013	100,000.00	2013-12	2013	Briarfield Capital
Blausey - Grace L Blausey Trust	10/29/2013	100,000.00	2013-10	2013	Briarfield Capital
Blausey - Grace L Blausey Trust	12/2/2015	20,000.00	2015-12	2015	Briarfield Capital
Blochinger, Judith	1/21/2014	90,000.00	2014-01	2014	Briarfield Capital
Blochinger, Judith	12/30/2014	10,000.00	2014-12	2014	Briarfield Capital
Blochinger, Judith	8/8/2016	10,000.00	2016-08	2016	Briarfield Capital
Boes, Robert & Bonnie	12/21/2012	240,000.00	2012-12	2012	Briarfield Capital
Boes, Robert & Bonnie	3/11/2014	15,000.00	2014-03	2014	Briarfield Capital
Boes, Robert & Bonnie	10/13/2016	25,000.00	2016-10	2016	Briarfield Capital
Bosler, Thomas & Edith	11/15/2013	75,000.00	2013-11	2013	Briarfield Capital
Bosler, Thomas & Edith	4/6/2015	25,000.00	2015-04	2015	Briarfield Capital

Brodin, Erik	2/1/2013	100,000.00	2013-02	2013	Briarfield Capital
Brodin, Erik	9/20/2013	100,000.00	2013-09	2013	Briarfield Capital
Brodin, Erik	10/6/2014	50,000.00	2014-10	2014	Briarfield Capital
Bueno, Paula	4/24/2013	50,000.00	2013-04	2013	Briarfield Capital
Burnard, Helen / Burnard, James / Helen R Burnard Living Trust	7/31/2013	80,000.00	2013-07	2013	Briarfield Capital
Burton, Stanley & Sherrie	7/11/2012	30,000.00	2012-07	2012	Briarfield Capital
Burzynski, Beverly	10/11/2012	10,000.00	2012-10	2012	Briarfield Capital
Burzynski, Beverly	5/24/2013	10,000.00	2013-05	2013	Briarfield Capital
Burzynski, Beverly	10/29/2013	100,000.00	2013-10	2013	Briarfield Capital
Burzynski, Beverly	11/18/2014	15,000.00	2014-11	2014	Briarfield Capital
Burzynski, Beverly	9/23/2015	10,000.00	2015-09	2015	Briarfield Capital
Burzynski, Beverly	9/23/2015	10,000.00	2015-09	2015	Briarfield Capital
Burzynski, Beverly	5/20/2016	15,000.00	2016-05	2016	Briarfield Capital
Chastain, James / Chastain, Evan / Chastain, Renee	6/5/2013	100,000.00	2013-06	2013	Briarfield Capital
Cordrey, Kathleen / Cordrey, Raymond	6/27/2012	120,000.00	2012-06	2012	Briarfield Capital
Cordrey, Kathleen / Cordrey, Raymond	1/15/2013	30,000.00	2013-01	2013	Briarfield Capital
Cordrey, Kathleen / Cordrey, Raymond	1/17/2013	15,000.00	2013-01	2013	Briarfield Capital
Cordrey, Kathleen / Cordrey, Raymond	1/24/2013	10,000.00	2013-01	2013	Briarfield Capital
Cordrey, Kathleen / Cordrey, Raymond	11/3/2017	10,000.00	2017-11	2017	Briarfield Capital
Cordrey, Kathleen / Cordrey, Raymond	11/6/2017	15,000.00	2017-11	2017	Briarfield Capital
Cramer-Rumple, Dorcas	2/14/2017	35,000.00	2017-02	2017	Briarfield Capital
Decker, Kevin / Franklin, Stephanie Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	6/4/2014	60,000.00	2014-06	2014	Briarfield Capital
	12/12/2013	50,000.00	2013-12	2013	Briarfield Capital

Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	6/20/2014	50,000.00	2014-06	2014	Briarfield Capital
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	2/20/2015	60,000.00	2015-02	2015	Briarfield Capital
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	7/1/2015	40,000.00	2015-07	2015	Briarfield Capital
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	2/11/2016	10,000.00	2016-02	2016	Briarfield Capital
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	4/6/2016	10,000.00	2016-04	2016	Briarfield Capital
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	10/10/2017	15,000.00	2017-10	2017	Briarfield Capital
Dille, Michael	4/25/2013	100,000.00	2013-04	2013	Briarfield Capital
Dille, Michael	7/23/2013	75,000.00	2013-07	2013	Briarfield Capital
Dunstan, Kenneth / Dunstan, Sue	6/27/2016	75,000.00	2016-06	2016	Briarfield Capital
Easterday, Jeff & Jennifer	6/14/2013	35,000.00	2013-06	2013	Briarfield Capital
Easterday, Jeff & Jennifer	6/14/2013	10,000.00	2013-06	2013	Briarfield Capital
Easterday, Jeff & Jennifer	6/14/2013	85,000.00	2013-06	2013	Briarfield Capital
Easterday, Jeff & Jennifer	2/13/2014	115,000.00	2014-02	2014	Briarfield Capital
Eaton, Jeanne	7/31/2014	50,000.00	2014-07	2014	Briarfield Capital
Faykosh, Paul	10/10/2014	10,000.00	2014-10	2014	Briarfield Capital
Felton, Linda	7/23/2012	250,000.00	2012-07	2012	Briarfield Capital
Felton, Linda	6/2/2016	10,000.00	2016-06	2016	Briarfield Capital
Fink, John	7/15/2013	50,000.00	2013-07	2013	Briarfield Capital
Fitch, George	2/5/2013	100,000.00	2013-02	2013	Briarfield Capital
Fitch, George	11/13/2013	100,000.00	2013-11	2013	Briarfield Capital
Fitch, George	1/1/2015	100,000.00	2015-01	2015	Briarfield Capital
Fitch, George	6/25/2015	20,000.00	2015-06	2015	Briarfield Capital
Fitch, George	3/29/2016	10,000.00	2016-03	2016	Briarfield Capital

Frederick, Sharon	2/20/2013	15,000.00	2013-02	2013	Briarfield Capital
Fullhart, Gary	12/2/2013	25,000.00	2013-12	2013	Briarfield Capital
Gerbich, Theodore	10/4/2012	120,000.00	2012-10	2012	Briarfield Capital
Gibney, Kimberly	1/30/2014	100,000.00	2014-01	2014	Briarfield Capital
Gibney, Kimberly	4/17/2015	15,000.00	2015-04	2015	Briarfield Capital
Gossman, Larry and Debra	2/1/2013	30,000.00	2013-02	2013	Briarfield Capital
Graham, James	5/2/2012	580,000.00	2012-05	2012	Briarfield Capital
Hackett - Carol Hackett Trust / Hackett, Pat	10/25/2013	250,000.00	2013-10	2013	Briarfield Capital
Hammer, Gregory and Ann	12/18/2012	50,000.00	2012-12	2012	Briarfield Capital
Hancock, John / John Hancock Living Trust	3/27/2012	50,000.00	2012-03	2012	Briarfield Capital
Heinig, Diane	11/4/2013	50,000.00	2013-11	2013	Briarfield Capital
Heinig, Diane	8/13/2015	20,000.00	2015-08	2015	Briarfield Capital
Herring, Paul & Debora	1/24/2014	30,000.00	2014-01	2014	Briarfield Capital
Herring, Paul & Debora	3/7/2016	10,000.00	2016-03	2016	Briarfield Capital
Herring, Paul & Debora	8/23/2017	10,000.00	2017-08	2017	Briarfield Capital
Hill, John	2/13/2015	25,000.00	2015-02	2015	Briarfield Capital
Holdridge, Douglas & Judith	5/1/2013	25,000.00	2013-05	2013	Briarfield Capital
Howey, Ed	12/10/2012	200,000.00	2012-12	2012	Briarfield Capital
Howey, Ed	12/17/2012	125,000.00	2012-12	2012	Briarfield Capital
Hundsrucker, Thomas	7/23/2013	30,000.00	2013-07	2013	Briarfield Capital
Huntzinger, Nancy	12/10/2012	100,000.00	2012-12	2012	Briarfield Capital
Johnson, Robert	6/19/2013	50,000.00	2013-06	2013	Briarfield Capital
Kiss, Gary	6/3/2013	40,000.00	2013-06	2013	Briarfield Capital

Klein, Dana	1/23/2013	50,000.00	2013-01	2013	Briarfield Capital
Klockenga, George & Bel	3/25/2015	50,000.00	2015-03	2015	Briarfield Capital
Koechel, Daniel and Mary	4/26/2013	50,000.00	2013-04	2013	Briarfield Capital
Koechel, Daniel and Mary	4/26/2013	50,000.00	2013-04	2013	Briarfield Capital
Kohler - Mary Ellen Kohler Trust	9/22/2015	200,000.00	2015-09	2015	Briarfield Capital
Kohler - Mary Ellen Kohler Trust	4/4/2014	50,000.00	2014-04	2014	Briarfield Capital
Kramer, James	2/21/2013	60,000.00	2013-02	2013	Briarfield Capital
Kuchers, Donald and Catherine	2/19/2016	15,000.00	2016-02	2016	Briarfield Capital
Kuchers, Donald and Catherine	8/28/2015	150,000.00	2015-08	2015	Briarfield Capital
Kuchers, Donald and Catherine	8/26/2015	100,000.00	2015-08	2015	Briarfield Capital
Kuchers, Donald and Catherine	8/25/2015	80,000.00	2015-08	2015	Briarfield Capital
Kulakowski, Michael	10/17/2013	10,000.00	2013-10	2013	Briarfield Capital
Kulakowski, Michael	6/5/2013	60,000.00	2013-06	2013	Briarfield Capital
Kulakowski, Michael	12/3/2012	100,000.00	2012-12	2012	Briarfield Capital
Kurek, Todd & Barbara	1/11/2016	100,000.00	2016-01	2016	Briarfield Capital
LaFaso, Amy	11/28/2014	50,000.00	2014-11	2014	Briarfield Capital
Larimer, Susan	7/28/2017	30,000.00	2017-07	2017	Briarfield Capital
Larimer, Susan	6/30/2015	20,000.00	2015-06	2015	Briarfield Capital
Larimer, Susan	6/27/2013	100,000.00	2013-06	2013	Briarfield Capital
Lau, Mahlon	7/1/2014	100,000.00	2014-07	2014	Briarfield Capital
Lemmerman, Gilbert	5/10/2016	10,000.00	2016-05	2016	Briarfield Capital
Lemmerman, Gilbert	6/4/2013	100,000.00	2013-06	2013	Briarfield Capital
Lumbrezer, Paul and Diane	5/28/2013	100,000.00	2013-05	2013	Briarfield Capital

McCoy, Daniel	6/11/2013	50,000.00	2013-06	2013	Briarfield Capital
McCracken, Robert	5/1/2013	50,000.00	2013-05	2013	Briarfield Capital
Mellott, Alana K	11/7/2013	50,000.00	2013-11	2013	Briarfield Capital
Milligan, Robert and Valinda	3/7/2013	10,000.00	2013-03	2013	Briarfield Capital
Mollenkopf, Martha	7/14/2015	40,000.00	2015-07	2015	Briarfield Capital
Mollenkopf, Martha	12/20/2013	100,000.00	2013-12	2013	Briarfield Capital
Mollenkopf, Martha	12/18/2013	50,000.00	2013-12	2013	Briarfield Capital
Montrie, Janet L.	5/17/2016	10,000.00	2016-05	2016	Briarfield Capital
Montrie, Janet L.	6/11/2013	50,000.00	2013-06	2013	Briarfield Capital
Moskowitz, Michelle	5/23/2013	50,000.00	2013-05	2013	Briarfield Capital
Myers, Donald	6/7/2017	10,000.00	2017-06	2017	Briarfield Capital
Myers, Donald	4/15/2013	30,000.00	2013-04	2013	Briarfield Capital
Myers, John & Nancy	11/24/2014	50,000.00	2014-11	2014	Briarfield Capital
Myers, Judy & Roger	4/18/2013	25,000.00	2013-04	2013	Briarfield Capital
Myers, Judy & Roger	4/18/2013	25,000.00	2013-04	2013	Briarfield Capital
Nachtrab, Mary	12/19/2013	50,000.00	2013-12	2013	Briarfield Capital
Neiderman, William & Joy	6/20/2013	50,000.00	2013-06	2013	Briarfield Capital
Newman, Robert	5/16/2017	10,000.00	2017-05	2017	Briarfield Capital
Newman, Robert	1/31/2017	30,000.00	2017-01	2017	Briarfield Capital
Newman, Robert	11/4/2014	10,000.00	2014-11	2014	Briarfield Capital
Newman, Robert	5/17/2013	60,000.00	2013-05	2013	Briarfield Capital
Newman, Robert	8/15/2012	40,000.00	2012-08	2012	Briarfield Capital
Obertacz / Toledo Wire Products	7/21/2015	100,000.00	2015-07	2015	Briarfield Capital

Obertacz / Toledo Wire Products	10/19/2011	350,000.00	2011-10	2011	Briarfield Capital
Obertacz / Toledo Wire Products	10/19/2011	170,000.00	2011-10	2011	Briarfield Capital
Papier, Elvin / Graceco	3/29/2012	590,000.00	2012-03	2012	Briarfield Capital
Petersen, Edward	3/31/2014	50,000.00	2014-03	2014	Briarfield Capital
Purewal, Sukhjit	5/1/2015	40,000.00	2015-05	2015	Briarfield Capital
Purewal, Sukhjit	2/25/2014	250,000.00	2014-02	2014	Briarfield Capital
Reed, Diane and John	3/25/2015	100,000.00	2015-03	2015	Briarfield Capital
Reynolds, Debora	12/4/2014	50,000.00	2014-12	2014	Briarfield Capital
Rittichier, Clement	1/24/2014	100,000.00	2014-01	2014	Briarfield Capital
Rogers, Jan	11/30/2016	5,000.00	2016-11	2016	Briarfield Capital
Rogers, Jan	5/28/2013	50,000.00	2013-05	2013	Briarfield Capital
Rolsten, Kathy	11/27/2013	50,000.00	2013-11	2013	Briarfield Capital
Rose, Karen / Rose, William	5/11/2015	15,000.00	2015-05	2015	Briarfield Capital
Rose, Karen / Rose, William	1/6/2015	20,000.00	2015-01	2015	Briarfield Capital
Rose, Karen / Rose, William	11/28/2012	50,000.00	2012-11	2012	Briarfield Capital
Rose, Karen / Rose, William	6/12/2012	60,000.00	2012-06	2012	Briarfield Capital
Rose, Karen / Rose, William	6/8/2012	100,000.00	2012-06	2012	Briarfield Capital
Schira, Michael / Schira, Mary	1/30/2013	200,000.00	2013-01	2013	Briarfield Capital
Shasteen, James	6/5/2013	100,000.00	2013-06	2013	Briarfield Capital
Shively, Sarah	10/28/2015	15,000.00	2015-10	2015	Briarfield Capital
Shugg, Russell	4/29/2013	25,000.00	2013-04	2013	Briarfield Capital
Soldner, Elizabeth C.	2/13/2014	20,000.00	2014-02	2014	Briarfield Capital
Soldner, Elizabeth C.	8/14/2013	40,000.00	2013-08	2013	Briarfield Capital

Solt, Mary Kay	1/28/2013	60,000.00	2013-01	2013	Briarfield Capital
Stelnicki, Edward & Audrey	6/1/2012	30,000.00	2012-06	2012	Briarfield Capital
Stelnicki, Edward & Audrey	3/29/2012	25,000.00	2012-03	2012	Briarfield Capital
Stelnicki, Edward & Audrey	3/29/2012	135,000.00	2012-03	2012	Briarfield Capital
Stiff, Richard / Stiff, Ruth	4/19/2013	50,000.00	2013-04	2013	Briarfield Capital
Stine, James	5/8/2013	50,000.00	2013-05	2013	Briarfield Capital
Suon, Greg & Sherry	12/4/2013	40,000.00	2013-12	2013	Briarfield Capital
Sweetland, John & Myra	9/11/2013	25,000.00	2013-09	2013	Briarfield Capital
Tambor, Stanley	12/28/2012	100,000.00	2012-12	2012	Briarfield Capital
Thomas Farms/ Thomas, Jeffrey	4/3/2013	100,000.00	2013-04	2013	Briarfield Capital
Torda, Peggy & Steven / Torda Living Trust	2/3/2014	30,000.00	2014-02	2014	Briarfield Capital
Torda, Peggy & Steven / Torda Living Trust	12/17/2013	35,000.00	2013-12	2013	Briarfield Capital
Tylicki, Walter and Carol	4/25/2016	10,000.00	2016-04	2016	Briarfield Capital
Tylicki, Walter and Carol	4/25/2016	15,000.00	2016-04	2016	Briarfield Capital
Tylicki, Walter and Carol	11/6/2015	10,000.00	2015-11	2015	Briarfield Capital
Tylicki, Walter and Carol	3/24/2014	20,000.00	2014-03	2014	Briarfield Capital
Tylicki, Walter and Carol	3/5/2014	20,000.00	2014-03	2014	Briarfield Capital
Vaccaro, Jack and Sheila	5/28/2015	25,000.00	2015-05	2015	Briarfield Capital
Vaccaro, Jack and Sheila	5/22/2015	65,000.00	2015-05	2015	Briarfield Capital
Vaccaro, Jack and Sheila	11/19/2013	85,000.00	2013-11	2013	Briarfield Capital
Vaccaro, Jack and Sheila	11/19/2013	10,000.00	2013-11	2013	Briarfield Capital
Vallego, Alfredo Jr.	3/3/2014	25,000.00	2014-03	2014	Briarfield Capital
Wahren, Roselyn	5/8/2013	40,000.00	2013-05	2013	Briarfield Capital

Walsh, Richard	1/31/2014	20,000.00	2014-01	2014	Briarfield Capital
Walsh, Richard	10/21/2013	25,000.00	2013-10	2013	Briarfield Capital
Walsh, Richard	3/5/2013	20,000.00	2013-03	2013	Briarfield Capital
Ward, William J / Ward, Sharon	6/14/2017	100,000.00	2017-06	2017	Briarfield Capital
Ward, William J / Ward, Sharon	7/14/2016	20,000.00	2016-07	2016	Briarfield Capital
Ward, William J / Ward, Sharon	6/13/2016	55,000.00	2016-06	2016	Briarfield Capital
White, Thomas / White, Ellen / Thomas & Ellen White Trust	4/30/2013	100,000.00	2013-04	2013	Briarfield Capital
White, William	9/1/2015	35,000.00	2015-09	2015	Briarfield Capital
Whitney, James	2/4/2014	100,000.00	2014-02	2014	Briarfield Capital
Wolford, Robert and Jayne	7/12/2012	10,000.00	2012-07	2012	Briarfield Capital
Ardner, Charles & Linda / The Ardner Trust	8/10/2011	50,000.00	2011-08	2011	King's Pointe Leasing
Ardner, Charles & Linda / The Ardner Trust	3/2/2012	50,000.00	2012-03	2012	King's Pointe Leasing
Armstrong, Alberta	12/1/2017	25,000.00	2017-12	2017	King's Pointe Leasing
Armstrong, Alberta	1/31/2012	50,000.00	2012-01	2012	King's Pointe Leasing
Augustine, David / Florence Augustine Family Trust	9/7/2011	75,000.00	2011-09	2011	King's Pointe Leasing
Augustine, David / Florence Augustine Family Trust	9/7/2011	75,000.00	2011-09	2011	King's Pointe Leasing
Augustine, David / Florence Augustine Family Trust	9/19/2011	50,000.00	2011-09	2011	King's Pointe Leasing
Bechstein, Loren & Ellen	12/14/2011	10,000.00	2011-12	2011	King's Pointe Leasing
Bechstein, Loren & Ellen	1/11/2012	10,000.00	2012-01	2012	King's Pointe Leasing
Bechstein, Loren & Ellen	4/16/2012	20,000.00	2012-04	2012	King's Pointe Leasing
Bechstein, Loren & Ellen	4/24/2013	20,000.00	2013-04	2013	King's Pointe Leasing
Bechstein, Loren & Ellen	10/27/2011	50,000.00	2011-10	2011	King's Pointe Leasing
Bechstein, Loren & Ellen	8/24/2011	100,000.00	2011-08	2011	King's Pointe Leasing

Bigelow, Nancy	10/21/2011	50,000.00	2011-10	2011	King's Pointe Leasing
Boes, Robert & Bonnie	8/24/2011	100,000.00	2011-08	2011	King's Pointe Leasing
Boes, Robert & Bonnie	2/10/2012	10,000.00	2012-02	2012	King's Pointe Leasing
Boes, Robert & Bonnie	7/11/2012	50,000.00	2012-07	2012	King's Pointe Leasing
Buri, William	10/12/2011	55,000.00	2011-10	2011	King's Pointe Leasing
Burnard, Helen / Burnard, James / Helen R Burnard Living Trust	10/24/2011	50,000.00	2011-10	2011	King's Pointe Leasing
Burnard, Helen / Burnard, James / Helen R Burnard Living Trust	10/24/2011	50,000.00	2011-10	2011	King's Pointe Leasing
Burzynski, Beverly	9/6/2011	55,000.00	2011-09	2011	King's Pointe Leasing
Burzynski, Beverly	3/7/2012	45,000.00	2012-03	2012	King's Pointe Leasing
Chastain, James / Chastain, Evan / Chastain, Renee	6/5/2013	100,000.00	2013-06	2013	King's Pointe Leasing
Cordrey, Kathleen / Cordrey, Raymond	1/6/2012	200,000.00	2012-01	2012	King's Pointe Leasing
Decker, Kevin / Franklin, Stephanie	3/12/2012	10,000.00	2012-03	2012	King's Pointe Leasing
Decker, Kevin / Franklin, Stephanie	6/11/2015	10,000.00	2015-06	2015	King's Pointe Leasing
Decker, Kevin / Franklin, Stephanie	12/20/2012	100,000.00	2012-12	2012	King's Pointe Leasing
Decker, Kevin / Franklin, Stephanie	3/28/2012	50,000.00	2012-03	2012	King's Pointe Leasing
Decker, Kevin / Franklin, Stephanie	3/19/2012	30,000.00	2012-03	2012	King's Pointe Leasing
DelVerne, James	5/7/2012	10,000.00	2012-05	2012	King's Pointe Leasing
Diehlman, Dennis	7/20/2012	50,000.00	2012-07	2012	King's Pointe Leasing
Faykosh, Paul	8/19/2013	80,000.00	2013-08	2013	King's Pointe Leasing
Gerbich, Theodore	1/23/2012	70,000.00	2012-01	2012	King's Pointe Leasing
Graham, James	8/16/2011	100,000.00	2011-08	2011	King's Pointe Leasing
Hancock, John / John Hancock Living Trust	8/23/2011	100,000.00	2011-08	2011	King's Pointe Leasing
Heiing, Diane	11/4/2013	100,000.00	2013-11	2013	King's Pointe Leasing

Hockett, Janice	1/6/2012	50,000.00	2012-01	2012	King's Pointe Leasing
Holdridge, Douglas & Judith	5/1/2013	50,000.00	2013-05	2013	King's Pointe Leasing
Jacobs, Michael	9/8/2011	100,000.00	2011-09	2011	King's Pointe Leasing
Jarchow, Jerry	11/3/2011	150,000.00	2011-11	2011	King's Pointe Leasing
Jarchow, Jerry	12/24/2015	15,000.00	2015-12	2015	King's Pointe Leasing
Johnson, Robert	1/13/2012	100,000.00	2012-01	2012	King's Pointe Leasing
Koechel, Daniel and Mary	2/17/2012	50,000.00	2012-02	2012	King's Pointe Leasing
Koechel, Daniel and Mary	2/17/2012	50,000.00	2012-02	2012	King's Pointe Leasing
Kulakowski, Michael	6/4/2013	50,000.00	2013-06	2013	King's Pointe Leasing
Kulakowski, Michael	11/3/2012	100,000.00	2012-11	2012	King's Pointe Leasing
Kulakowski, Michael	8/24/2011	55,000.00	2011-08	2011	King's Pointe Leasing
Larimer, Susan	6/27/2013	100,000.00	2013-06	2013	King's Pointe Leasing
Larimer, Susan	11/13/2012	100,000.00	2012-11	2012	King's Pointe Leasing
Lumbrezer, Paul and Diane	10/12/2011	200,000.00	2011-10	2011	King's Pointe Leasing
Mason, Bruce	8/29/2011	100,000.00	2011-08	2011	King's Pointe Leasing
McVeigh, James	9/3/2013	35,000.00	2013-09	2013	King's Pointe Leasing
McVeigh, James	12/22/2011	25,000.00	2011-12	2011	King's Pointe Leasing
McVeigh, James	3/28/2016	10,000.00	2016-03	2016	King's Pointe Leasing
Meloy, John & Cynthia	9/10/2013	20,000.00	2013-09	2013	King's Pointe Leasing
Meloy, John & Cynthia	1/9/2013	10,000.00	2013-01	2013	King's Pointe Leasing
Miller, Gerald	7/23/2012	50,000.00	2012-07	2012	King's Pointe Leasing
Mollenkopf, Martha	11/29/2012	15,000.00	2012-11	2012	King's Pointe Leasing
Mollenkopf, Martha	1/11/2012	20,000.00	2012-01	2012	King's Pointe Leasing

Myers, Judy & Roger	2/8/2012	50,000.00	2012-02	2012	King's Pointe Leasing
Neiderman, William & Joy	1/19/2012	100,000.00	2012-01	2012	King's Pointe Leasing
Newman, Robert	11/9/2011	100,000.00	2011-11	2011	King's Pointe Leasing
Novak, Beverly	5/14/2015	10,000.00	2015-05	2015	King's Pointe Leasing
Novak, Beverly	1/22/2018	30,000.00	2018-01	2018	King's Pointe Leasing
Novak, Beverly	1/14/2015	40,000.00	2015-01	2015	King's Pointe Leasing
Novak, Beverly	12/6/2017	35,000.00	2017-12	2017	King's Pointe Leasing
Novak, Beverly	11/6/2017	60,000.00	2017-11	2017	King's Pointe Leasing
Novak, Beverly	3/31/2014	50,000.00	2014-03	2014	King's Pointe Leasing
Obertacz / Toledo Wire Products	10/19/2011	100,000.00	2011-10	2011	King's Pointe Leasing
Obertacz / Toledo Wire Products	10/19/2011	100,000.00	2011-10	2011	King's Pointe Leasing
Papier, Elvin / Graceco	8/26/2011	150,000.00	2011-08	2011	King's Pointe Leasing
Peterson, Jr, Lauren L	4/1/2016	20,000.00	2016-04	2016	King's Pointe Leasing
Peterson, Jr, Lauren L	3/14/2013	20,000.00	2013-03	2013	King's Pointe Leasing
Peterson, Jr, Lauren L	3/8/2013	20,000.00	2013-03	2013	King's Pointe Leasing
Peterson, Jr, Lauren L	10/11/2012	80,000.00	2012-10	2012	King's Pointe Leasing
Peterson, Jr, Lauren L	12/18/2017	30,000.00	2017-12	2017	King's Pointe Leasing
Purewal, Sukhjit	2/25/2014	250,000.00	2014-02	2014	King's Pointe Leasing
Rathbun, Nancy	12/1/2017	25,000.00	2017-12	2017	King's Pointe Leasing
Rittichier, Clement	1/24/2014	100,000.00	2014-01	2014	King's Pointe Leasing
Rose, Karen / Rose, William	1/3/2014	55,000.00	2014-01	2014	King's Pointe Leasing
Rose, Karen / Rose, William	11/28/2012	50,000.00	2012-11	2012	King's Pointe Leasing
Rose, Karen / Rose, William	6/12/2012	50,000.00	2012-06	2012	King's Pointe Leasing

Rose, Karen / Rose, William	6/5/2012	200,000.00	2012-06	2012	King's Pointe Leasing
Rose, Karen / Rose, William	4/6/2012	5,000.00	2012-04	2012	King's Pointe Leasing
Rose, Karen / Rose, William	10/26/2011	90,000.00	2011-10	2011	King's Pointe Leasing
Rose, Karen / Rose, William	1/31/2014	25,000.00	2014-01	2014	King's Pointe Leasing
Stelnicki, Edward & Audrey	8/31/2011	75,000.00	2011-08	2011	King's Pointe Leasing
Stelnicki, Edward & Audrey	7/29/2011	25,000.00	2011-07	2011	King's Pointe Leasing
Stiff, Richard / Stiff, Ruth	11/7/2011	75,000.00	2011-11	2011	King's Pointe Leasing
Stiff, Richard / Stiff, Ruth	11/2/2011	75,000.00	2011-11	2011	King's Pointe Leasing
Thomas Farms/ Thomas, Jeffrey	4/3/2013	100,000.00	2013-04	2013	King's Pointe Leasing
Walsh, Richard	6/18/2012	20,000.00	2012-06	2012	King's Pointe Leasing
Walsh, Richard	2/6/2012	15,000.00	2012-02	2012	King's Pointe Leasing
White, Thomas / White, Ellen / Thomas & Ellen White Trust	4/18/2012	100,000.00	2012-04	2012	King's Pointe Leasing
White, William	8/30/2011	50,000.00	2011-08	2011	King's Pointe Leasing
Wildridge, George	2/27/2012	100,000.00	2012-02	2012	King's Pointe Leasing
Wolford, Robert and Jayne	12/12/2013	100,000.00	2013-12	2013	King's Pointe Leasing
Wolford, Robert and Jayne	7/31/2012	50,000.00	2012-07	2012	King's Pointe Leasing
Wolford, Robert and Jayne	7/30/2012	60,000.00	2012-07	2012	King's Pointe Leasing
Wolford, Robert and Jayne	7/19/2012	40,000.00	2012-07	2012	King's Pointe Leasing
Wolford, Robert and Jayne	4/16/2012	20,000.00	2012-04	2012	King's Pointe Leasing
Wolford, Robert and Jayne	2/24/2012	20,000.00	2012-02	2012	King's Pointe Leasing
Wolford, Robert and Jayne	2/19/2015	35,000.00	2015-02	2015	King's Pointe Leasing
Wolford, Robert and Jayne	2/6/2012	80,000.00	2012-02	2012	King's Pointe Leasing
Wolford, Robert and Jayne	1/21/2015	20,000.00	2015-01	2015	King's Pointe Leasing

Wolford, Robert and Jayne	10/19/2011	80,000.00	2011-10	2011	King's Pointe Leasing
Wolford, Robert and Jayne	8/18/2017	25,000.00	2017-08	2017	King's Pointe Leasing
Wolford, Robert and Jayne	8/18/2017	25,000.00	2017-08	2017	King's Pointe Leasing
Zouhary, William	4/25/2012	200,000.00	2012-04	2012	King's Pointe Leasing
Ace Appliance	10/21/2011	25,000.00	2011-10	2011	King's Pointe Leasing
Albright, Troy / Albright, Wendy	12/23/2011	40,000.00	2011-12	2011	King's Pointe Leasing
Albright, Troy / Albright, Wendy	10/4/2012	50,000.00	2012-10	2012	King's Pointe Leasing
Ankenbrandt, Daniel	5/20/2013	25,000.00	2013-05	2013	King's Pointe Leasing
Buri, Lynn B. Buri Trust - Custody c/o Erika Buri	5/9/2014	75,000.00	2014-05	2014	King's Pointe Leasing
Byerly, Dale	5/2/2013	100,000.00	2013-05	2013	King's Pointe Leasing
Dunlap, Natalie	5/9/2013	25,000.00	2013-05	2013	King's Pointe Leasing
Earl, Patricia	8/29/2011	50,000.00	2011-08	2011	King's Pointe Leasing
Johnson, Kay Larimer Family Gift Fund - Philip T. Tobin/Thomas J. Tobin	1/12/2012	50,000.00	2012-01	2012	King's Pointe Leasing
	12/5/2011	100,000.00	2011-12	2011	King's Pointe Leasing
Malec, Judith / Malec, Leonard	10/28/2011	90,000.00	2011-10	2011	King's Pointe Leasing
Malec, Judith / Malec, Leonard	10/24/2011	90,000.00	2011-10	2011	King's Pointe Leasing
Palmer, Albert / Palmer, Phyllis	10/7/2011	20,000.00	2011-10	2011	King's Pointe Leasing
Palmer, Albert / Palmer, Phyllis	3/26/2014	25,000.00	2014-03	2014	King's Pointe Leasing
Pennington, Larry & Muriel	11/15/2013	100,000.00	2013-11	2013	King's Pointe Leasing
Pullella, John	6/25/2013	50,000.00	2013-06	2013	King's Pointe Leasing
Rathbun, Betty	8/1/2013	100,000.00	2013-08	2013	King's Pointe Leasing
Start, Roger & Karen	2/8/2012	50,000.00	2012-02	2012	King's Pointe Leasing
Start, Roger & Karen	2/2/2012	50,000.00	2012-02	2012	King's Pointe Leasing

Taylor, Dennis/ Pexco Packaging	3/10/2017	5,000.00	2017-03	2017	King's Pointe Leasing
Taylor, Dennis/ Pexco Packaging	10/12/2011	65,000.00	2011-10	2011	King's Pointe Leasing
Tebeau, Ernest and Linda	7/27/2011	300,000.00	2011-07	2011	King's Pointe Leasing
Ardner, Charles & Linda / The Ardner Trust	4/25/2014	25,000.00	2014-04	2014	ThunderRoad Financial
Armstrong, Alberta	5/30/2014	100,000.00	2014-05	2014	ThunderRoad Financial
Barber, Kelly	10/21/2014	50,000.00	2014-10	2014	ThunderRoad Financial
Blausey - Grace L Blausey Trust	4/24/2014	100,000.00	2014-04	2014	ThunderRoad Financial
Brodin, Erik	10/6/2014	100,000.00	2014-10	2014	ThunderRoad Financial
Chastain, James / Chastain, Evan / Chastain, Renee	10/1/2014	30,000.00	2014-10	2014	ThunderRoad Financial
Chastain, James / Chastain, Evan / Chastain, Renee	6/27/2014	50,000.00	2014-06	2014	ThunderRoad Financial
Chastain, James / Chastain, Evan / Chastain, Renee	5/2/2014	25,000.00	2014-05	2014	ThunderRoad Financial
Chastain, James / Chastain, Evan / Chastain, Renee	6/18/2015	30,000.00	2015-06	2015	ThunderRoad Financial
Cordrey, Kathleen / Cordrey, Raymond	6/10/2014	12,000.00	2014-06	2014	ThunderRoad Financial
Cordrey, Kathleen / Cordrey, Raymond	6/6/2014	22,000.00	2014-06	2014	ThunderRoad Financial
Decker, Kevin / Franklin, Stephanie Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	6/4/2014	59,000.00	2014-06	2014	ThunderRoad Financial
Diehlman, Dennis	7/30/2014	25,000.00	2014-07	2014	ThunderRoad Financial
Eaton, Jeanne	7/31/2014	50,000.00	2014-07	2014	ThunderRoad Financial
Felton, Linda	4/15/2014	50,000.00	2014-04	2014	ThunderRoad Financial
Gibney, Kimberly	4/24/2014	100,000.00	2014-04	2014	ThunderRoad Financial
Hancock, John / John Hancock Living Trust	9/24/2014	50,000.00	2014-09	2014	ThunderRoad Financial
Holdridge, Douglas & Judith	6/30/2014	25,000.00	2014-06	2014	ThunderRoad Financial
Jacobs, Michael	3/18/2014	50,000.00	2014-03	2014	ThunderRoad Financial

Jarchow, Jerry	4/2/2014	25,000.00	2014-04	2014	ThunderRoad Financial
Kulakowski, Michael	8/5/2014	25,000.00	2014-08	2014	ThunderRoad Financial
Larimer, Susan	6/26/2014	50,000.00	2014-06	2014	ThunderRoad Financial
Lau, Mahlon	7/1/2014	100,000.00	2014-07	2014	ThunderRoad Financial
Lemmerman, Gilbert	4/29/2014	150,000.00	2014-04	2014	ThunderRoad Financial
Lumbrezer, Paul and Diane	3/3/2014	100,000.00	2014-03	2014	ThunderRoad Financial
McCracken, Robert	9/8/2014	25,000.00	2014-09	2014	ThunderRoad Financial
Meloy, John & Cynthia	5/29/2014	20,000.00	2014-05	2014	ThunderRoad Financial
Newman, Robert	4/11/2014	50,000.00	2014-04	2014	ThunderRoad Financial
Nyitray, Marlene	5/6/2014	55,000.00	2014-05	2014	ThunderRoad Financial
Papier, Elvin / Graceco	2/20/2014	150,000.00	2014-02	2014	ThunderRoad Financial
Peterson, Jr, Lauren L	4/10/2014	50,000.00	2014-04	2014	ThunderRoad Financial
Rittichier, Clement	6/17/2014	110,000.00	2014-06	2014	ThunderRoad Financial
Schira, Michael / Schira, Mary	3/18/2014	100,000.00	2014-03	2014	ThunderRoad Financial
Steyer, Duane and Suzanne	5/9/2014	330,000.00	2014-05	2014	ThunderRoad Financial
Steyer, Duane and Suzanne	8/8/2014	100,000.00	2014-08	2014	ThunderRoad Financial
Stiff, Richard / Stiff, Ruth	3/27/2014	50,000.00	2014-03	2014	ThunderRoad Financial
Sweetland, John & Myra	6/24/2014	50,000.00	2014-06	2014	ThunderRoad Financial
White, Thomas / White, Ellen / Thomas & Ellen White Trust	5/12/2014	100,000.00	2014-05	2014	ThunderRoad Financial
Whitney, James	2/26/2014	50,000.00	2014-02	2014	ThunderRoad Financial
Wright, Margaret	8/26/2014	65,000.00	2014-08	2014	ThunderRoad Financial
Zouhary, William	10/6/2014	50,000.00	2014-10	2014	ThunderRoad Financial
Ardner, Charles & Linda / The Ardner Trust	1/14/2016	25,000.00	2016-01	2016	ThunderRoad Partners

Ayalon, Anne	Not Provided.	20,000.00	N/A	N/A	ThunderRoad Partners
Baldwin, Donald	9/8/2015	75,000.00	2015-09	2015	ThunderRoad Partners
Barber, Kelly	12/8/2015	50,000.00	2015-12	2015	ThunderRoad Partners
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	12/10/2014	40,000.00	2014-12	2014	ThunderRoad Partners
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	12/10/2014	75,000.00	2014-12	2014	ThunderRoad Partners
Blausey - Grace L Blausey Trust	12/4/2015	100,000.00	2015-12	2015	ThunderRoad Partners
Brodin, Erik	7/13/2016	100,000.00	2016-07	2016	ThunderRoad Partners
Buck, Judy	1/7/2015	50,000.00	2015-01	2015	ThunderRoad Partners
Buckenmeyer, William / Buckenmeyer, Karen / Buckenmeyer Farms	1/27/2016	1,000,000.00	2016-01	2016	ThunderRoad Partners
Buckenmeyer, William / Buckenmeyer, Karen / Buckenmeyer Farms	1/27/2016	150,000.00	2016-01	2016	ThunderRoad Partners
Buri, William / Pexco Packaging	5/18/2015	50,000.00	2015-05	2015	ThunderRoad Partners
Buri, William / Pexco Packaging	5/17/2016	10,000.00	2016-05	2016	ThunderRoad Partners
Chastain, James / Chastain, Evan / Chastain, Renee	12/22/2014	25,000.00	2014-12	2014	ThunderRoad Partners
Chastain, James / Chastain, Evan / Chastain, Renee	1/14/2015	30,000.00	2015-01	2015	ThunderRoad Partners
Chastain, James / Chastain, Evan / Chastain, Renee	1/26/2015	50,000.00	2015-01	2015	ThunderRoad Partners
Chastain, James / Chastain, Evan / Chastain, Renee	1/16/2015	50,000.00	2015-01	2015	ThunderRoad Partners
Chastain, James / Chastain, Evan / Chastain, Renee	7/28/2015	50,000.00	2015-07	2015	ThunderRoad Partners
Cramer-Rumple, Dorcas	5/26/2015	50,000.00	2015-05	2015	ThunderRoad Partners
Decker, Kevin / Franklin, Stephanie	6/4/2015	59,000.00	2015-06	2015	ThunderRoad Partners
Decker, Kevin / Franklin, Stephanie	6/15/2015	1,000.00	2015-06	2015	ThunderRoad Partners
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	1/14/2015	200,000.00	2015-01	2015	ThunderRoad Partners
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	1/14/2015	50,000.00	2015-01	2015	ThunderRoad Partners
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	1/14/2015	50,000.00	2015-01	2015	ThunderRoad Partners

Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	7/14/2015	55,000.00	2015-07	2015	ThunderRoad Partners
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	10/17/2015	25,000.00	2015-10	2015	ThunderRoad Partners
Dierksheide, Mary Ellen	2/12/2015	-	2015-02	2015	ThunderRoad Partners
Dille, Michael	8/13/2015	25,000.00	2015-08	2015	ThunderRoad Partners
Dille, Michael	7/25/2016	15,000.00	2016-07	2016	ThunderRoad Partners
Eaton, Jeanne	Not Provided.	50,000.00	N/A	N/A	ThunderRoad Partners
Gibney, Kimberly	4/16/2015	150,000.00	2015-04	2015	ThunderRoad Partners
Hackett - Carol Hackett Trust / Hackett, Pat	2/9/2015	100,000.00	2015-02	2015	ThunderRoad Partners
Hackett - Carol Hackett Trust / Hackett, Pat	Not Provided.	20,000.00	N/A	N/A	ThunderRoad Partners
Hackett - Carol Hackett Trust / Hackett, Pat	Not Provided.	20,000.00	N/A	N/A	ThunderRoad Partners
Hackett, Michael	Not Provided.	20,000.00	N/A	N/A	ThunderRoad Partners
Hancock, John / John Hancock Living Trust	2/10/2015	75,000.00	2015-02	2015	ThunderRoad Partners
Hensien Christopher	1/28/2015	50,000.00	2015-01	2015	ThunderRoad Partners
Hill, John	2/13/2015	25,000.00	2015-02	2015	ThunderRoad Partners
Jacobs, Michael	12/15/2015	50,000.00	2015-12	2015	ThunderRoad Partners
Jarchow, Jerry	12/18/2015	25,000.00	2015-12	2015	ThunderRoad Partners
Kemp, Richard & Lani	Not Provided.	25,000.00	N/A	N/A	ThunderRoad Partners
Kenney, Patrick/ Wilcox Financial	Not Provided.	50,000.00	N/A	N/A	ThunderRoad Partners
Klockenga, George & Bel	3/25/2015	50,000.00	2015-03	2015	ThunderRoad Partners
Klockenga, George & Bel	7/5/2016	50,000.00	2016-07	2016	ThunderRoad Partners
Kuchers, Donald and Catherine	12/18/2015	50,000.00	2015-12	2015	ThunderRoad Partners
Kuchers, Donald and Catherine	8/25/2015	150,000.00	2015-08	2015	ThunderRoad Partners
Kurek, Todd & Barbara	1/11/2016	150,000.00	2016-01	2016	ThunderRoad Partners

LaFaso, Amy	11/28/2014	100,000.00	2014-11	2014	ThunderRoad Partners
Larimer, Susan	Not Provided.	10,000.00	N/A	N/A	ThunderRoad Partners
Larimer, Susan	3/23/2016	20,000.00	2016-03	2016	ThunderRoad Partners
Larimer, Susan	10/22/2014	50,000.00	2014-10	2014	ThunderRoad Partners
Larimer, Susan	5/12/2015	50,000.00	2015-05	2015	ThunderRoad Partners
Lau, Mahlon	8/3/2015	100,000.00	2015-08	2015	ThunderRoad Partners
Lemmerman, Gilbert	5/13/2015	150,000.00	2015-05	2015	ThunderRoad Partners
Lewis, David / Lewis, Kimberly / Monroe Farm Mineral	Not Provided.	25,000.00	N/A	N/A	ThunderRoad Partners
Lewis, David / Lewis, Kimberly / Monroe Farm Mineral	2/17/2016	55,000.00	2016-02	2016	ThunderRoad Partners
Lewis, David / Lewis, Kimberly / Monroe Farm Mineral	2/17/2016	20,000.00	2016-02	2016	ThunderRoad Partners
Loper, George & Lisbeth	6/13/2016	30,000.00	2016-06	2016	ThunderRoad Partners
Lumbrezer, Paul and Diane	11/3/2015	100,000.00	2015-11	2015	ThunderRoad Partners
Malka, Nicholas	Not Provided.	100,000.00	N/A	N/A	ThunderRoad Partners
Mapes, Pamela / Mapes, Terry	Not Provided.	10,000.00	N/A	N/A	ThunderRoad Partners
Mapes, Pamela / Mapes, Terry	Not Provided.	30,000.00	N/A	N/A	ThunderRoad Partners
Mapes, Pamela / Mapes, Terry	7/25/2016	50,000.00	2016-07	2016	ThunderRoad Partners
McCracken, Robert	Not Provided.	10,000.00	N/A	N/A	ThunderRoad Partners
McCracken, Robert	7/1/2015	25,000.00	2015-07	2015	ThunderRoad Partners
McCracken, Robert	7/1/2015	25,000.00	2015-07	2015	ThunderRoad Partners
Mellott, Alana K	8/19/2015	30,000.00	2015-08	2015	ThunderRoad Partners
Meloy, John & Cynthia	5/17/2016	10,000.00	2016-05	2016	ThunderRoad Partners
Meloy, John & Cynthia	12/4/2015	20,000.00	2015-12	2015	ThunderRoad Partners
Miller, Douglas	7/15/2016	10,000.00	2016-07	2016	ThunderRoad Partners

Miller, Gerald	Not Provided.	25,000.00	N/A	N/A	ThunderRoad Partners
Moline, Kristin/ Gibney, Kimberly	Not Provided.	50,000.00	N/A	N/A	ThunderRoad Partners
Moline, Kristin/ Gibney, Kimberly	Not Provided.	100,000.00	N/A	N/A	ThunderRoad Partners
Newman, Robert	11/11/2015	50,000.00	2015-11	2015	ThunderRoad Partners
Niemeyer, Constance	Not Provided.	25,000.00	N/A	N/A	ThunderRoad Partners
Northwest Capital FBO Delverne	Not Provided.	10,000.00	N/A	N/A	ThunderRoad Partners
Northwest Capital FBO Delverne	3/21/2016	15,000.00	2016-03	2016	ThunderRoad Partners
Novak, Beverly	5/27/2016	15,000.00	2016-05	2016	ThunderRoad Partners
Novak, Beverly	5/27/2016	10,000.00	2016-05	2016	ThunderRoad Partners
Novak, Beverly	3/22/2016	50,000.00	2016-03	2016	ThunderRoad Partners
Novak, Beverly	1/12/2016	60,000.00	2016-01	2016	ThunderRoad Partners
Novak, Beverly	7/8/2015	55,000.00	2015-07	2015	ThunderRoad Partners
Nyitray, Marlene	7/31/2015	15,000.00	2015-07	2015	ThunderRoad Partners
Nyitray, Marlene	12/4/2014	55,000.00	2014-12	2014	ThunderRoad Partners
Oliver, Margaret	Not Provided.	20,000.00	N/A	N/A	ThunderRoad Partners
Papier, Elvin / Graceco	11/12/2015	150,000.00	2015-11	2015	ThunderRoad Partners
Papier, Elvin / Graceco	4/30/2015	40,000.00	2015-04	2015	ThunderRoad Partners
Peatee, Michael G.	4/19/2016	30,000.00	2016-04	2016	ThunderRoad Partners
Peatee, Michael G.	12/31/2015	70,000.00	2015-12	2015	ThunderRoad Partners
Peterson, Jr, Lauren L	Not Provided.	35,000.00	N/A	N/A	ThunderRoad Partners
Peterson, Jr, Lauren L	12/9/2014	50,000.00	2014-12	2014	ThunderRoad Partners
Peterson, Jr, Lauren L	12/9/2014	50,000.00	2014-12	2014	ThunderRoad Partners
Pollock, Larry	1/12/2015	50,000.00	2015-01	2015	ThunderRoad Partners

Price, Chris & Julie	3/5/2015	50,000.00	2015-03	2015	ThunderRoad Partners
Reed, Diane and John	3/23/2015	100,000.00	2015-03	2015	ThunderRoad Partners
Repka, Anthony and Marcela	11/24/2015	25,000.00	2015-11	2015	ThunderRoad Partners
Rittichier, Clement	6/18/2015	125,000.00	2015-06	2015	ThunderRoad Partners
Rose, Karen / Rose, William	1/23/2015	50,000.00	2015-01	2015	ThunderRoad Partners
Schira, Michael / Schira, Mary	7/19/2016	20,000.00	2016-07	2016	ThunderRoad Partners
Schira, Michael / Schira, Mary	11/5/2015	40,000.00	2015-11	2015	ThunderRoad Partners
Schira, Michael / Schira, Mary	7/18/2016	100,000.00	2016-07	2016	ThunderRoad Partners
Schuffenecker, Thomas	Not Provided.	25,000.00	N/A	N/A	ThunderRoad Partners
Schuffenecker, Thomas	Not Provided.	50,000.00	N/A	N/A	ThunderRoad Partners
Schuffenecker, Thomas	Not Provided.	25,000.00	N/A	N/A	ThunderRoad Partners
Sedlmeier, Scott & Adrienne	11/23/2015	40,000.00	2015-11	2015	ThunderRoad Partners
Segel, Nancy	10/30/2014	25,000.00	2014-10	2014	ThunderRoad Partners
Stiff, Richard / Stiff, Ruth	2/22/2016	50,000.00	2016-02	2016	ThunderRoad Partners
Sweetland, John & Myra	Not Provided.	15,000.00	N/A	N/A	ThunderRoad Partners
Sweetland, John & Myra	10/28/2015	40,000.00	2015-10	2015	ThunderRoad Partners
Sweetland, John & Myra	8/14/2015	50,000.00	2015-08	2015	ThunderRoad Partners
Sweetland, John & Myra	8/13/2015	35,000.00	2015-08	2015	ThunderRoad Partners
Tylicki, Walter and Carol	5/17/2016	40,000.00	2016-05	2016	ThunderRoad Partners
Walsh, Richard	9/14/2015	25,000.00	2015-09	2015	ThunderRoad Partners
White, Thomas / White, Ellen / Thomas & Ellen White Trust	12/7/2015	100,000.00	2015-12	2015	ThunderRoad Partners
Whitney, James	12/4/2015	50,000.00	2015-12	2015	ThunderRoad Partners
Wolford, Robert and Jayne	4/21/2015	50,000.00	2015-04	2015	ThunderRoad Partners

Wright, Margaret	1/7/2016	65,000.00	2016-01	2016	ThunderRoad Partners
Zouhary, William	Not Provided.	10,000.00	N/A	N/A	ThunderRoad Partners
Zouhary, William	6/9/2015	10,000.00	2015-06	2015	ThunderRoad Partners
Zouhary, William	6/18/2015	50,000.00	2015-06	2015	ThunderRoad Partners
Augustine, David / Florence Augustine Family Trust	12/21/2015	100,000.00	2015-12	2015	TRF Fund I
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	10/5/2015	100,000.00	2015-10	2015	TRF Fund I
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	5/16/2016	25,000.00	2016-05	2016	TRF Fund I
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	4/21/2016	200,000.00	2016-04	2016	TRF Fund I
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	5/17/2016	25,000.00	2016-05	2016	TRF Fund I
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	12/5/2016	50,000.00	2016-12	2016	TRF Fund I
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	4/18/2016	75,000.00	2016-04	2016	TRF Fund I
Bigelow, Nancy	11/23/2015	25,000.00	2015-11	2015	TRF Fund I
Bigelow, Nancy	5/20/2016	25,000.00	2016-05	2016	TRF Fund I
Bigelow, Nancy	6/17/2016	25,000.00	2016-06	2016	TRF Fund I
Chastain, James / Chastain, Evan / Chastain, Renee	5/18/2016	25,000.00	2016-05	2016	TRF Fund I
Chastain, James / Chastain, Evan / Chastain, Renee	2/19/2016	75,000.00	2016-02	2016	TRF Fund I
Cordrey, Kathleen / Cordrey, Raymond	4/6/2016	50,000.00	2016-04	2016	TRF Fund I
Cordrey, Kathleen / Cordrey, Raymond	4/6/2016	25,000.00	2016-04	2016	TRF Fund I
Cordrey, Kathleen / Cordrey, Raymond Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	10/9/2015	175,000.00	2015-10	2015	TRF Fund I
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	10/27/2015	25,000.00	2015-10	2015	TRF Fund I
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	2/11/2016	225,000.00	2016-02	2016	TRF Fund I
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	2/25/2016	25,000.00	2016-02	2016	TRF Fund I

Dunstan, Kenneth / Dunstan, Sue	6/21/2016	100,000.00	2016-06	2016	TRF Fund I
Felton, Linda	10/5/2015	25,000.00	2015-10	2015	TRF Fund I
Felton, Linda	6/2/2016	25,000.00	2016-06	2016	TRF Fund I
Felton, Linda	9/29/2015	50,000.00	2015-09	2015	TRF Fund I
Holgate Metal Fab 401k / Spangler	3/4/2016	75,000.00	2016-03	2016	TRF Fund I
Holgate Metal Fab 401k / Spangler	3/4/2016	325,000.00	2016-03	2016	TRF Fund I
Keel, Gregory T.	10/13/2015	25,000.00	2015-10	2015	TRF Fund I
Kemp, Richard & Lani	4/29/2016	50,000.00	2016-04	2016	TRF Fund I
Kovco, Georgia	8/8/2016	100,000.00	2016-08	2016	TRF Fund I
Kuchers, Donald and Catherine	2/19/2016	25,000.00	2016-02	2016	TRF Fund I
Kuchers, Donald and Catherine	12/18/2015	50,000.00	2015-12	2015	TRF Fund I
Kuchers, Donald and Catherine	11/16/2015	150,000.00	2015-11	2015	TRF Fund I
Kurek, Todd & Barbara	1/11/2016	250,000.00	2016-01	2016	TRF Fund I
Lemmerman, Gilbert	5/10/2016	25,000.00	2016-05	2016	TRF Fund I
Lemmerman, Gilbert	6/20/2016	50,000.00	2016-06	2016	TRF Fund I
Lemmerman, Gilbert	1/13/2016	25,000.00	2016-01	2016	TRF Fund I
Lewis, David / Lewis, Kimberly / Monroe Farm Mineral	7/20/2016	25,000.00	2016-07	2016	TRF Fund I
Lewis, David / Lewis, Kimberly / Monroe Farm Mineral	7/13/2016	25,000.00	2016-07	2016	TRF Fund I
Lewis, David / Lewis, Kimberly / Monroe Farm Mineral	2/17/2016	25,000.00	2016-02	2016	TRF Fund I
Lewis, David / Lewis, Kimberly / Monroe Farm Mineral	2/17/2016	50,000.00	2016-02	2016	TRF Fund I
Lewis, David / Lewis, Kimberly / Monroe Farm Mineral	2/17/2016	50,000.00	2016-02	2016	TRF Fund I
Loper, George & Lisbeth	6/9/2016	25,000.00	2016-06	2016	TRF Fund I
Loper, George & Lisbeth	6/9/2016	50,000.00	2016-06	2016	TRF Fund I

Lumbrezer, Paul and Diane	6/10/2016	100,000.00	2016-06	2016	TRF Fund I
Manchester Roofing	12/10/2015	100,000.00	2015-12	2015	TRF Fund I
Manchester Roofing	12/10/2015	100,000.00	2015-12	2015	TRF Fund I
Mapes, Pamela / Mapes, Terry	7/20/2016	75,000.00	2016-07	2016	TRF Fund I
Miller, Daniel	6/1/2016	400,000.00	2016-06	2016	TRF Fund I
Miller, Daniel	6/1/2016	100,000.00	2016-06	2016	TRF Fund I
Miller, Daniel	7/5/2016	200,000.00	2016-07	2016	TRF Fund I
Northwest Capital FBO Delverne	2/2/2016	25,000.00	2016-02	2016	TRF Fund I
Northwest Capital FBO John Doe	4/6/2016	25,000.00	2016-04	2016	TRF Fund I
Papier, Elvin / Graceco	6/9/2016	100,000.00	2016-06	2016	TRF Fund I
Peatee, Michael G.	12/30/2015	50,000.00	2015-12	2015	TRF Fund I
Peatee, Michael G.	1/26/2015	50,000.00	2015-01	2015	TRF Fund I
Repka, Anthony and Marcela	12/22/2015	25,000.00	2015-12	2015	TRF Fund I
Rittichier, Clement	3/11/2016	275,000.00	2016-03	2016	TRF Fund I
Rose, Karen / Rose, William	4/29/2016	25,000.00	2016-04	2016	TRF Fund I
Rose, Karen / Rose, William	2/12/2016	25,000.00	2016-02	2016	TRF Fund I
Schira, Michael / Schira, Mary	11/6/2015	100,000.00	2015-11	2015	TRF Fund I
Schuffenecker, Thomas	8/2/2016	150,000.00	2016-08	2016	TRF Fund I
Sedlmeier, Scott & Adrienne	11/23/2015	50,000.00	2015-11	2015	TRF Fund I
Smirin, Laura J.	3/23/2016	25,000.00	2016-03	2016	TRF Fund I
Stiff, Richard / Stiff, Ruth	6/8/2016	25,000.00	2016-06	2016	TRF Fund I
Suon, Greg & Sherry	7/6/2016	100,000.00	2016-07	2016	TRF Fund I
Tylicki, Walter and Carol	11/6/2015	25,000.00	2015-11	2015	TRF Fund I

Vaccaro, Jack and Sheila	2/8/2016	75,000.00	2016-02	2016	TRF Fund I
Ward, William J / Ward, Sharon	4/14/2016	100,000.00	2016-04	2016	TRF Fund I
Williamson, Robert D.	12/16/2015	100,000.00	2015-12	2015	TRF Fund I
Wolford, Robert and Jayne	8/8/2016	30,000.00	2016-08	2016	TRF Fund I
Wolford, Robert and Jayne	12/23/2015	25,000.00	2015-12	2015	TRF Fund I
Wolford, Robert and Jayne	1/4/2016	50,000.00	2016-01	2016	TRF Fund I
Wolford, Robert and Jayne	1/4/2016	25,000.00	2016-01	2016	TRF Fund I
Zouhary, William	2/25/2016	50,000.00	2016-02	2016	TRF Fund I
Zouhary, William	4/21/2016	50,000.00	2016-04	2016	TRF Fund I
Anderson, Phillip & Ruth	11/18/2016	50,000.00	2016-11	2016	TRF Fund II
Barber, Kelly	9/22/2016	10,000.00	2016-09	2016	TRF Fund II
Barga, Keith	8/25/2016	30,000.00	2016-08	2016	TRF Fund II
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	5/1/2017	15,000.00	2017-05	2017	TRF Fund II
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	8/4/2017	25,000.00	2017-08	2017	TRF Fund II
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	8/11/2017	10,000.00	2017-08	2017	TRF Fund II
Bigelow, Nancy	10/19/2016	30,000.00	2016-10	2016	TRF Fund II
Bigelow, Nancy	6/14/2017	15,000.00	2017-06	2017	TRF Fund II
Black, Michael	12/13/2016	100,000.00	2016-12	2016	TRF Fund II
Black, Michael	1/6/2017	175,000.00	2017-01	2017	TRF Fund II
Black, Michael	1/27/2017	10,000.00	2017-01	2017	TRF Fund II
Black, Michael	9/13/2017	55,000.00	2017-09	2017	TRF Fund II
Brodin, Erik	7/21/2016	35,000.00	2016-07	2016	TRF Fund II
Burnard, Helen / Burnard, James / Helen R Burnard Living Trust	1/3/2017	15,000.00	2017-01	2017	TRF Fund II

Burnard, Helen / Burnard, James / Helen R Burnard Living Trust	1/3/2017	15,000.00	2017- 01	2017	TRF Fund II
Burzynski, Beverly	5/15/2017	10,000.00	2017- 05	2017	TRF Fund II
Chastain, James / Chastain, Evan / Chastain, Renee	3/8/2017	20,000.00	2017- 03	2017	TRF Fund II
Cordrey, Kathleen / Cordrey, Raymond	9/9/2016	15,000.00	2016- 09	2016	TRF Fund II
Cordrey, Kathleen / Cordrey, Raymond	1/6/2017	10,000.00	2017- 01	2017	TRF Fund II
Cordrey, Kathleen / Cordrey, Raymond	1/6/2017	10,000.00	2017- 01	2017	TRF Fund II
Cordrey, Kathleen / Cordrey, Raymond	4/11/2017	35,000.00	2017- 04	2017	TRF Fund II
Cordrey, Kathleen / Cordrey, Raymond	4/26/2017	40,000.00	2017- 04	2017	TRF Fund II
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	8/29/2016	15,000.00	2016- 08	2016	TRF Fund II
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	7/18/2016	20,000.00	2016- 07	2016	TRF Fund II
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	1/6/2017	10,000.00	2017- 01	2017	TRF Fund II
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	1/17/2017	30,000.00	2017- 01	2017	TRF Fund II
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	3/24/2017	10,000.00	2017- 03	2017	TRF Fund II
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	Not Provided.	10,000.00	N/A	N/A	TRF Fund II
Dille, Michael	Not Provided.	15,000.00	N/A	N/A	TRF Fund II
Dunstan, Kenneth / Dunstan, Sue	11/25/2016	130,000.00	2016- 11	2016	TRF Fund II
Dunstan, Kenneth / Dunstan, Sue	4/13/2017	10,000.00	2017- 04	2017	TRF Fund II
Dunstan, Kenneth / Dunstan, Sue	6/14/2017	10,000.00	2017- 06	2017	TRF Fund II
Dunstan, Kenneth / Dunstan, Sue	9/21/2017	110,000.00	2017- 09	2017	TRF Fund II
Eaton, Jeanne	1/19/2017	10,000.00	2017- 01	2017	TRF Fund II
Faykosh, Paul	6/2/2017	15,000.00	2017- 06	2017	TRF Fund II
Fitch, George	1/17/2017	15,000.00	2017- 01	2017	TRF Fund II
Hauserman, Timothy	8/11/2016	30,000.00	2016- 08	2016	TRF Fund II

Hinojosa, Juan & Susan	9/6/2017	45,000.00	2017-09	2017	TRF Fund II
Hockett, Janice	9/6/2016	10,000.00	2016-09	2016	TRF Fund II
Holdridge, Douglas & Judith	5/1/2017	25,000.00	2017-05	2017	TRF Fund II
Holgate Metal Fab 401k / Spangler	6/23/2017	25,000.00	2017-06	2017	TRF Fund II
Holgate Metal Fab 401k / Spangler	6/28/2017	40,000.00	2017-06	2017	TRF Fund II
Jarchow, Jerry	9/22/2016	10,000.00	2016-09	2016	TRF Fund II
Jarchow, Jerry	10/18/2017	15,000.00	2017-10	2017	TRF Fund II
Klockenga, George & Bel	7/10/2017	10,000.00	2017-07	2017	TRF Fund II
Kuchers, Donald and Catherine	12/6/2016	25,000.00	2016-12	2016	TRF Fund II
Kuchers, Donald and Catherine	12/6/2016	85,000.00	2016-12	2016	TRF Fund II
Kuchers, Donald and Catherine	10/31/2016	10,000.00	2016-10	2016	TRF Fund II
Kuchers, Donald and Catherine	10/24/2016	10,000.00	2016-10	2016	TRF Fund II
Kurek, Todd & Barbara	8/19/2016	110,000.00	2016-08	2016	TRF Fund II
LaFaso, Amy	4/25/2017	10,000.00	2017-04	2017	TRF Fund II
LaFaso, Amy	9/23/2016	10,000.00	2016-09	2016	TRF Fund II
Lemmerman, Gilbert	4/11/2017	20,000.00	2017-04	2017	TRF Fund II
Lemmerman, Gilbert	11/25/2016	35,000.00	2016-11	2016	TRF Fund II
Lewis, David / Lewis, Kimberly / Monroe Farm Mineral	2/27/2017	10,000.00	2017-02	2017	TRF Fund II
Loper, George & Lisbeth	9/21/2016	10,000.00	2016-09	2016	TRF Fund II
Manchester Roofing	2/24/2017	10,000.00	2017-02	2017	TRF Fund II
Mapes, Pamela / Mapes, Terry	11/10/2017	10,000.00	2017-11	2017	TRF Fund II
Mapes, Pamela / Mapes, Terry	10/11/2016	100,000.00	2016-10	2016	TRF Fund II
Mapes, Pamela / Mapes, Terry	9/13/2016	50,000.00	2016-09	2016	TRF Fund II

McCoy, Daniel	8/5/2016	10,000.00	2016-08	2016	TRF Fund II
Miller, Daniel	6/27/2017	25,000.00	2017-06	2017	TRF Fund II
Miller, Daniel	12/27/2016	10,000.00	2016-12	2016	TRF Fund II
Miller, Daniel	9/20/2016	15,000.00	2016-09	2016	TRF Fund II
Nachtrab, Mary	11/16/2016	10,000.00	2016-11	2016	TRF Fund II
Newman, Robert	2/6/2017	100,000.00	2017-02	2017	TRF Fund II
Niemeyer, Constance	9/14/2016	70,000.00	2016-09	2016	TRF Fund II
Niemeyer, Constance	8/23/2016	95,000.00	2016-08	2016	TRF Fund II
Northwest Capital FBO Delverne	4/26/2016	10,000.00	2016-04	2016	TRF Fund II
Northwest Capital FBO Delverne	11/2/2017	5,000.00	2017-11	2017	TRF Fund II
Northwest Capital FBO John Doe	4/26/2016	5,000.00	2016-04	2016	TRF Fund II
Northwest Capital FBO John Doe	11/8/2017	5,000.00	2017-11	2017	TRF Fund II
Nyitray, Marlene	1/19/2017	10,000.00	2017-01	2017	TRF Fund II
Nyitray, Marlene	7/21/2016	20,000.00	2016-07	2016	TRF Fund II
Petersen, Edward	5/25/2017	10,000.00	2017-05	2017	TRF Fund II
Reed, Diane and John	11/30/2016	10,000.00	2016-11	2016	TRF Fund II
Rittichier, Clement	3/8/2017	25,000.00	2017-03	2017	TRF Fund II
Rittichier, Clement	7/25/2016	15,000.00	2016-07	2016	TRF Fund II
Rose, Karen / Rose, William	5/15/2017	10,000.00	2017-05	2017	TRF Fund II
Rose, Karen / Rose, William	5/15/2017	20,000.00	2017-05	2017	TRF Fund II
Rose, Karen / Rose, William	12/16/2016	10,000.00	2016-12	2016	TRF Fund II
Rose, Karen / Rose, William	12/9/2016	15,000.00	2016-12	2016	TRF Fund II
Rose, Karen / Rose, William	8/2/2016	25,000.00	2016-08	2016	TRF Fund II

Schuffenecker, Thomas	8/4/2016	10,000.00	2016-08	2016	TRF Fund II
Schuffenecker, Thomas	8/2/2016	200,000.00	2016-08	2016	TRF Fund II
Sedlmeier, Scott & Adrienne	5/15/2017	10,000.00	2017-05	2017	TRF Fund II
Thomas Farms/ Thomas, Jeffrey	1/9/2017	10,000.00	2017-01	2017	TRF Fund II
Thomas Farms/ Thomas, Jeffrey	1/6/2017	20,000.00	2017-01	2017	TRF Fund II
Tylicki, Walter and Carol	12/16/2016	5,000.00	2016-12	2016	TRF Fund II
Tylicki, Walter and Carol	12/16/2016	5,000.00	2016-12	2016	TRF Fund II
Wahren, Roselyn	3/24/2017	10,000.00	2017-03	2017	TRF Fund II
Walsh, Richard	8/16/2016	15,000.00	2016-08	2016	TRF Fund II
Ward, William J / Ward, Sharon	6/14/2017	100,000.00	2017-06	2017	TRF Fund II
White, Thomas / White, Ellen / Thomas & Ellen White Trust	3/9/2017	100,000.00	2017-03	2017	TRF Fund II
White, Thomas / White, Ellen / Thomas & Ellen White Trust	3/3/2017	35,000.00	2017-03	2017	TRF Fund II
Whitney, James	10/13/2016	20,000.00	2016-10	2016	TRF Fund II
Wolford, Robert and Jayne	12/9/2016	5,000.00	2016-12	2016	TRF Fund II
Wolford, Robert and Jayne	12/9/2016	10,000.00	2016-12	2016	TRF Fund II
Zouhary, William	7/19/2017	10,000.00	2017-07	2017	TRF Fund II
Zouhary, William	3/7/2017	10,000.00	2017-03	2017	TRF Fund II
Augustine, David / Florence Augustine Family Trust	4/17/2013	75,000.00	2013-04	2013	Winding Creek Partners
Augustine, David / Florence Augustine Family Trust	4/17/2013	75,000.00	2013-04	2013	Winding Creek Partners
Augustine, David / Florence Augustine Family Trust	5/9/2013	50,000.00	2013-05	2013	Winding Creek Partners
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	11/1/2013	100,000.00	2013-11	2013	Winding Creek Partners
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	12/27/2013	50,000.00	2013-12	2013	Winding Creek Partners
Barrett, Dennis / Barrett, Greta / Barrett Family Trust	2/25/2014	50,000.00	2014-02	2014	Winding Creek Partners

Bigelow, Nancy	12/13/2013	55,000.00	2013-12	2013	Winding Creek Partners
Blochinger, Judith	1/21/2014	25,000.00	2014-01	2014	Winding Creek Partners
Boes, Robert & Bonnie	9/9/2013	100,000.00	2013-09	2013	Winding Creek Partners
Brodin, Erik	4/18/2013	50,000.00	2013-04	2013	Winding Creek Partners
Buckenmeyer, William / Buckenmeyer, Karen / Buckenmeyer Farms	8/5/2013	30,000.00	2013-08	2013	Winding Creek Partners
Buri, William	4/23/2014	70,000.00	2014-04	2014	Winding Creek Partners
Burnard, Helen / Burnard, James / Helen R Burnard Living Trust	5/20/2013	40,000.00	2013-05	2013	Winding Creek Partners
Burnard, Helen / Burnard, James / Helen R Burnard Living Trust	5/20/2013	40,000.00	2013-05	2013	Winding Creek Partners
Burzynski, Beverly	5/24/2013	100,000.00	2013-05	2013	Winding Creek Partners
Chastain, James / Chastain, Evan / Chastain, Renee	6/5/2013	25,000.00	2013-06	2013	Winding Creek Partners
Dibling Family Trust, John Dibling, Cheryl Doyle, Jones Industrial	12/12/2013	50,000.00	2013-12	2013	Winding Creek Partners
Dille, Michael	4/22/2013	50,000.00	2013-04	2013	Winding Creek Partners
Dille, Michael	7/16/2013	25,000.00	2013-07	2013	Winding Creek Partners
Fitch, George	9/4/2013	50,000.00	2013-09	2013	Winding Creek Partners
Graham, James	5/16/2013	150,000.00	2013-05	2013	Winding Creek Partners
Hammer, Gregory and Ann	10/25/2013	50,000.00	2013-10	2013	Winding Creek Partners
Hancock, John / John Hancock Living Trust	10/25/2013	95,000.00	2013-10	2013	Winding Creek Partners
Heiing, Diane	11/4/2013	50,000.00	2013-11	2013	Winding Creek Partners
Herring, Paul & Debora	1/28/2014	25,000.00	2014-01	2014	Winding Creek Partners
Hockett, Janice	6/11/2013	100,000.00	2013-06	2013	Winding Creek Partners
Jacobs, Michael	3/31/2014	50,000.00	2014-03	2014	Winding Creek Partners
Kuchers, Donald and Catherine	4/30/2015	100,000.00	2015-04	2015	Winding Creek Partners
Kuchers, Donald and Catherine	4/30/2015	50,000.00	2015-04	2015	Winding Creek Partners

LaFaso, Amy	11/28/2014	50,000.00	2014-11	2014	Winding Creek Partners
Lemmerman, Gilbert	7/10/2013	50,000.00	2013-07	2013	Winding Creek Partners
Lumbrezer, Paul and Diane	5/28/2013	200,000.00	2013-05	2013	Winding Creek Partners
Mason, Bruce	9/10/2013	150,000.00	2013-09	2013	Winding Creek Partners
McCracken, Robert	5/1/2013	25,000.00	2013-05	2013	Winding Creek Partners
McVeigh, James	8/19/2013	40,000.00	2013-08	2013	Winding Creek Partners
Metzger, Kenneth	12/4/2013	50,000.00	2013-12	2013	Winding Creek Partners
Metzger, Kenneth	4/9/2013	50,000.00	2013-04	2013	Winding Creek Partners
Miller, Douglas	9/30/2013	30,000.00	2013-09	2013	Winding Creek Partners
Moline, Kristin/ Gibney, Kimberly	3/25/2014	100,000.00	2014-03	2014	Winding Creek Partners
Mollenkopf, Martha	12/20/2013	100,000.00	2013-12	2013	Winding Creek Partners
Mollenkopf, Martha	12/3/2013	50,000.00	2013-12	2013	Winding Creek Partners
Myers, Judy & Roger	5/22/2013	100,000.00	2013-05	2013	Winding Creek Partners
Neiderman, William & Joy	6/20/2013	50,000.00	2013-06	2013	Winding Creek Partners
Newman, Robert	5/17/2013	50,000.00	2013-05	2013	Winding Creek Partners
Novak, Beverly	3/31/2014	25,000.00	2014-03	2014	Winding Creek Partners
Papier, Elvin / Graceco	4/17/2013	345,000.00	2013-04	2013	Winding Creek Partners
Peterson, Jr, Lauren L	4/10/2014	50,000.00	2014-04	2014	Winding Creek Partners
Peterson, Jr, Lauren L	3/14/2013	100,000.00	2013-03	2013	Winding Creek Partners
Phipps, William and JoAnn	9/20/2013	60,000.00	2013-09	2013	Winding Creek Partners
Phipps, William and JoAnn	9/17/2013	60,000.00	2013-09	2013	Winding Creek Partners
Repka, Anthony and Marcela	4/17/2014	25,000.00	2014-04	2014	Winding Creek Partners
Rittichier, Clement	1/24/2014	25,000.00	2014-01	2014	Winding Creek Partners

Rose, Karen / Rose, William	1/30/2014	100,000.00	2014-01	2014	Winding Creek Partners
Schira, Michael / Schira, Mary	9/30/2013	200,000.00	2013-09	2013	Winding Creek Partners
Sedlmeier, Scott & Adrienne	1/3/2014	40,000.00	2014-01	2014	Winding Creek Partners
Stelnicki, Edward & Audrey	9/4/2013	50,000.00	2013-09	2013	Winding Creek Partners
Stelnicki, Edward & Audrey	8/13/2013	50,000.00	2013-08	2013	Winding Creek Partners
Stiff, Richard / Stiff, Ruth	5/1/2013	100,000.00	2013-05	2013	Winding Creek Partners
Sweetland, John & Myra	9/11/2013	25,000.00	2013-09	2013	Winding Creek Partners
Thomas Farms/ Thomas, Jeffrey	6/5/2013	50,000.00	2013-06	2013	Winding Creek Partners
Thomas Farms/ Thomas, Jeffrey	4/3/2013	50,000.00	2013-04	2013	Winding Creek Partners
Vaccaro, Jack and Sheila	11/19/2013	25,000.00	2013-11	2013	Winding Creek Partners
Wahren, Roselyn	4/18/2013	25,000.00	2013-04	2013	Winding Creek Partners
Walsh, Richard	2/19/2014	25,000.00	2014-02	2014	Winding Creek Partners
Walsh, Richard	10/21/2013	25,000.00	2013-10	2013	Winding Creek Partners
White, Thomas / White, Ellen / Thomas & Ellen White Trust	7/10/2013	100,000.00	2013-07	2013	Winding Creek Partners
White, William	9/10/2013	100,000.00	2013-09	2013	Winding Creek Partners
Wildridge, George	2/7/2014	200,000.00	2014-02	2014	Winding Creek Partners
Williamson, Robert D.	1/7/2016	100,000.00	2016-01	2016	Winding Creek Partners
Wolford, Robert and Jayne	12/11/2013	20,000.00	2013-12	2013	Winding Creek Partners
Gomer, David	5/1/2013	12,500.00	2013-05	2013	Winding Creek Partners
Gomer, Robin	5/1/2013	12,500.00	2013-05	2013	Winding Creek Partners
Vermilya, Dave and Ellen	4/15/2013	50,000.00	2013-04	2013	Winding Creek Partners

**INCIDENT SEVEN HUNDRED FORTY-THREE:AGGRAVATED THEFT 2912.03**

**Defendants** Doug Miller  
**Date of Offense** On or about May 26, 2017

The Defendant did unlawfully did with purpose to deprive the owner, Sharon Ward, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

**INCIDENT SEVEN HUNDRED FORTY-FOUR: FALSE REPRESENTATION IN THE SALE OF A SECURITY F-1**

**Defendants** Brad Konerman  
**Date of Offense** On or about May 1, 2020

The Defendant unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

**INCIDENT SEVEN HUNDRED FORTY-FIVE: GRAND THEFT 2912.03 F-4**

**Defendants** Adam Salon, Brad Konerman  
**Date of Offense** On or about May 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Trent Redden, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

**INCIDENT SEVEN HUNDRED FORTY-SIX: TELECOMMUNICATIONS FRAUD F-2**

**Defendants** Adam Salon, Brad Konerman  
**Date of Offense** On or about May 1, 2020

The Defendant(s) unlawfully 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 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.

**INCIDENT SEVEN HUNDRED FORTY-SEVEN: GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about 11/18/2016 through 11/18/2019

The Defendant(s) unlawfully did with purpose to deprive the owner, Phillip and Anderson, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Phillip and Ruth Anderson--\$50,000.00

**INCIDENT SEVEN HUNDRED FORTY-EIGHT: GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about 8/25/2016 through 8/12/2019

The Defendant(s) unlawfully did with purpose to deprive the owner, Keith Barga, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more. Keith Barga--\$30,000.00.

**INCIDENT SEVEN HUNDRED FORTY-NINE: AGGRAVATED THEFT 2912.03 F-3**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about 7/31/2014 through 10/5/2021

The Defendant(s) unlawfully did with purpose to deprive the owner, Dennis Barret/Barrett Trust, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Dennis Barrett/Barrett Trust

**INCIDENT SEVEN HUNDRED FIFTY: AGGRAVATED THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about 10/2/2011 through 6/14/2017

The Defendant(s) unlawfully did with purpose to deprive the owner, Nancy Bigelow, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Nancy Bigelow --215,000.00

**INCIDENT SEVEN HUNDRED FIFTY-ONE: AGGRAVATED THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about 1/6/2017 through 1/27/2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Michael Black, of property or services, to wit: money, knowingly obtain or exert control over either the property or services

by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

Michael Black --240,000.00

**INCIDENT SEVEN HUNDRED FIFTY-TWO: AGGRAVATED THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about 6/21/2016 through 9/21/2017

The Defendant(s) unlawfully did with purpose to deprive the owner, Kenneth Dunstan, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

Kenneth Dunstan--220,000.00

**INCIDENT SEVEN HUNDRED FIFTY-THREE: GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about 8/9/2013 through 6/2/2017

The Defendant(s) unlawfully did with purpose to deprive the owner, Paul Faykosh, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Paul Faykosh--105,000.00

**INCIDENT SEVEN HUNDRED FIFTY-FOUR: GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about 1/28/2014 through 8/23/2017

The Defendant(s) unlawfully did with purpose to deprive the owner, Paul Herring, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Paul Herring the amount being \$50,000.00

**INCIDENT SEVEN HUNDRED FIFTY-FIVE: GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about November 23, 2015

The Defendant(s) unlawfully did with purpose to deprive the owner, Adrienne Seldmeier, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more.

Adrienne Seldmeier--60,000.00

**INCIDENT SEVEN HUNDRED FIFTY-SIX: GRAND THEFT 2912.03 F-3**

**Defendants** Gary Rathbun, Doug Miller, James DeVerne

**Date of Offense** On or about 4/3/2013 through 1/6/2017

The Defendant(s) unlawfully did with purpose to deprive the owner, Thomas Farms/Michael Thomas, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Thomas farms--170,000.00

**INCIDENT SEVEN HUNDRED FIFTY-SEVEN: GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DeVerne

**Date of Offense** On or about June 14, 2017

The Defendant(s) unlawfully did with purpose to deprive the owner, Sharon Ward, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more.

Sharon ward--100,000.00

**INCIDENT SEVEN HUNDRED FIFTY-EIGHT: GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DeVerne

**Date of Offense** On or about March 9, 2017

The Defendant(s) unlawfully did with purpose to deprive the owner, Ellen and Thomas White, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more.

Ellen and Thomas White--135,000.00

**INCIDENT SEVEN HUNDRED FIFTY-NINE: AGGRAVATED THEFT 2912.03 F-3**

**Defendants** Gary Rathbun, Doug Miller, James DeVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, David Augustine, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

David Augustine --370,000.00

**INCIDENT SEVEN HUNDRED SIXTY: AGGRAVATED THEFT 2912.03 F-3**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Robert Boes, of property or services, to wit: money, knowingly obtain or exert control over either the property or services without the consent of the owner or person authorized to give consent.

Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Robert Boes--\$400,000.00

**INCIDENT SEVEN HUNDRED SIXTY-ONE: AGGRAVATED THEFT 2912.03 F-3**

**Count Twenty-Five Aggravated Theft, §2913.02, F3**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Helen Burnard, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Helen Burnard--210,000.00

**INCIDENT SEVEN HUNDRED SIXTY-TWO: GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

Defendant(s) unlawfully did with purpose to deprive the owner, John Flnk, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

John Flnk--\$50,000.00

**INCIDENT SEVEN HUNDRED SIXTY-THREE: GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, George Fitch, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

George Fitch--25,000.00

**INCIDENT SEVEN HUNDRED SIXTY-FOUR: GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, John Hill, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

John Hill--20,000.00

**INCIDENT SEVEN HUNDRED SIXTY-FIVE: AGGRAVATED THEFT 2912.03 F-3**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Michael Jacobs, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Michael Jacobs--\$150,000.00

**INCIDENT SEVEN HUNDRED SIXTY-SIX: GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Gary Kiss, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Gary Kiss--40,000.00

**INCIDENT SEVEN HUNDRED SIXTY-SEVEN: GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Dana Klein, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Dana Klein--50,000.00

**INCIDENT SEVEN HUNDRED SIXTY-EIGHT: AGGRAVATED THEFT 2912.03 F-3**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Daniel Koechel, of property or services, to wit: money, knowingly obtain or exert control over either the property or services

by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.  
Daniel Koechel --100,000.00

**INCIDENT SEVEN HUNDRED SIXTY-NINE: AGGRAVATED THEFT 2912.03 F-3**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Todd Kurek, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Todd Kurek--360,000.00

**INCIDENT SEVEN HUNDRED SEVENTY: AGGRAVATED THEFT 2912.03 F-3**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Gilbert Lemmerman, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Gilbert Lemmerman--160,000.00

**INCIDENT SEVEN HUNDRED SEVENTY-ONE : GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Robert and Valinda Milligan, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Robert and Valinda Milligan--10,000.00

**INCIDENT SEVEN HUNDRED SEVENTY-TWO: GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Donald Myers, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Donald Myers--30,000.00

**INCIDENT SEVEN HUNDRED SEVENTY-THREE:AGGRAVATED THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, William Neiderman, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

William Neiderman--50,000.00

**INCIDENT SEVEN HUNDRED SEVENTY-FOUR: AGGRAVATED THEFT 2912.03 F-3**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Robert Newman, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Robert Newman--180,000.00

**INCIDENT SEVEN HUNDRED SEVENTY-FIVE: AGGRAVATED THEFT 2912.03 F-3**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Sukhjit Purewal, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars.

Sukhjit Purewal-250,000.00

**INCIDENT SEVEN HUNDRED SEVENTY-SIX: GRAND THEFT 2912.03 F-4**

**Defendants** Gary Rathbun, Doug Miller, James DelVerne

**Date of Offense** On or about October 1, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, Stanley Tambor, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Stanley Tambor--100,000.00

**INCIDENT SEVEN HUNDRED SEVENTY-SEVEN: TAMPERING WITH RECORDS  
2913.42 F-3**

**Defendants** James DelVerne, Colleen Hall, Adam Salon

**Date of Offense** On or about July 19, 2018

The Defendant(s) unlawfully did, knowing the defendant had no privilege to do so, and with purpose to defraud or knowing the defendant was facilitating a fraud on Transportation Alliance Bank falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Account Receivable/Invoice and the value of the data or computer software involved in the offense or the loss to the victim was one hundred fifty thousand dollars or more and/or the offense was committed for the purpose of devising or executing a scheme to defraud or to obtain property or services and the value of the property or services or the loss to the victim was seven thousand five hundred dollars or more.

TAB BANK UTAH, \$1,841,136.54 LOAN SECURED BY FORGED OR FAKE ACCOUNT RECEIVABLES

**INCIDENT SEVEN HUNDRED SEVENTY-EIGHT: AGGRAVATED THEFT 2912.03 F-3**

**Defendants** James DelVerne, Colleen Hall, Adam Salon

**Date of Offense** On or about July 19, 2018

The Defendant(s) unlawfully did with purpose to deprive the owner, TRANSPORTATION ALLIANCE BANK (TAB), of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

TAB BANK LOAN SECURED BY FAKE INVOICES

**INCIDENT SEVEN HUNDRED SEVENTY-NINE: TAMPERING WITH RECORDS  
2913.42 F-4**

**Defendants** James DelVerne

**Date of Offense** On or about March 12, 2018

The Defendant(s) unlawfully did, knowing the defendant had no privilege to do so, and with purpose to defraud or knowing the defendant was facilitating a fraud on TRANSPORTATION ALLIANCE BANK falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Account Receivable/Invoice and the value of the data or computer software involved in the offense or the loss to the victim was seven thousand five hundred dollars or more and was less than one hundred fifty thousand dollars.

TAMPERED WITH DEL MONTE FOOD INVOICE 64,800.00 DATED MARCH 12, 2018

**INCIDENT SEVEN HUNDRED EIGHTY: TAMPERING WITH RECORDS 2913.42 F-4**

**Defendants** James DelVerne

**Date of Offense** On or about April 4, 2018

The Defendant(s) unlawfully did, knowing the defendant had no privilege to do so, and with purpose to defraud or knowing the defendant was facilitating a fraud on TRANSPORTATION ALLIANCE BANK falsify, destroy, remove, conceal, alter, deface, or mutilate any writing,

computer software, data, or record, to wit: Account Receivable/Invoice and the value of the data or computer software involved in the offense or the loss to the victim was seven thousand five hundred dollars or more and was less than one hundred fifty thousand dollars.

TAMPERED WITH DEL MONTE INVOICE DATED APRIL 4 2018

**INCIDENT SEVEN HUNDRED EIGHTY-ONE: TAMPERING WITH RECORDS 2913.42 F-4**

**Defendants** James DelVerne

**Date of Offense** On or about August 7, 2018

The Defendant(s) unlawfully did, knowing the defendant had no privilege to do so, and with purpose to defraud or knowing the defendant was facilitating a fraud on TRANSPORTATION ALLIANCE BANK falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Account Receivable/Invoice and the value of the data or computer software involved in the offense or the loss to the victim was seven thousand five hundred dollars or more and was less than one hundred fifty thousand dollars.

TAMPERED WITH DEL MONTE INVOICE AUGSUT 7 2018

**INCIDENT SEVEN HUNDRED EIGHTY-TWO: TELECOMMUNICATIONS FRAUD 2913.05 F-2**

**Defendants** James DelVerne, Colleen Hall

**Date of Offense** On or about August 16, 2018

The Defendant(s) unlawfully 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 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. WIRING \$502,870.18 FROM WATERFORD BANK TO TAB BANK USING THE SAME ACCOUNT RECEIVABLES USED TO SECURE A LOAN FROM TAB BANK, THIS TIME THE LOAN WAS SECURED FROM WATERFORD BANK

**INCIDENT SEVEN HUNDRED EIGHTY-THREE: AGGRAVATED THEFT**

**Defendants** James DelVerne, Colleen Hall

**Date of Offense** On or about August 16, 2018

The Defendant(s) unlawfully did with purpose to deprive the owner, WATERFORD BANK, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty

thousand dollars or more.

STEALING \$502,870.18 BY USING TAMPERED WITH DOCUMENTS FROM WATERFORD BANK TO REPAY MONEY STOLEN FROM TRANSPORTATION ALLIANCE BANK (TAB)

**INCIDENT SEVEN HUNDRED EIGHTY-FOUR: SECURING WRITINGS BY DECEPTION 2913.43 F-3**

**Defendants** James DelVerne, Colleen Hall

**Date of Offense** On or about August 16, 2018

The Defendant(s) unlawfully did, by deception, cause WATERFORD BANK to execute any writing that disposed of or encumbered property, or by which a pecuniary obligation was incurred and the value of the property or the obligation involved was one hundred fifty thousand dollars or more.

SECURING A REVOLVING TERM NOTE FROM WATERFORD BANK BY DECEPTION (FAKE ACCOUNT RECEIVABLES) LOAN VALUE 2.75 MILLION AT WATERFORD

**INCIDENT SEVEN HUNDRED EIGHTY-FIVE: SECURING WRITINGS BY DECEPTION 2913.43 F-3**

**Defendants** James DelVerne

**Date of Offense** On or about January 6, 2017

The Defendant unlawfully did, by deception, cause TRANSPORTATION ALLIANCE BANK (TAB) to execute any writing that disposed of or encumbered property, or by which a pecuniary obligation was incurred and the value of the property or the obligation involved was one hundred fifty thousand dollars or more.

SECURING A 2.5 MILLION DOLLAR LOAN FROM TRANSPORTATION ALLIANCE BANK BY DECEPTION--FAKE ACCOUNT RECEIVABLES. THE FRAUD WAS DISCOVERED ON OR ABOUT JULY 19, 2018

**INCIDENT SEVEN HUNDRED EIGHTY-SIX: AGGRAVATED THEFT: 2913.02 F-2**

**Defendants** James DelVerne, Colleen Hall

**Date of Offense** On or about August 20, 2018

The Defendant(s) unlawfully did with purpose to deprive the owner, WATERFORD BANK, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven hundred fifty thousand dollars or more.

SECURING A 1.4 MILLION DOLLAR LOAN FROM TAB BANK BY DECEPTION (FAKE ACCCOUNT RECIEVABLES) HALL IS COMPLICIT

**INCIDENT SEVEN HUNDRED EIGHTY-SEVEN: TAMPERING WITH RECORDS,  
2913.42 F-3**

**Defendants** James DelVerne, Colleen Hall

**Date of Offense** On or about February 8, 2019

The Defendant(s) unlawfully did, knowing the defendant had no privilege to do so, and with purpose to defraud or knowing the defendant was facilitating a fraud on WATERFORD BANK falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Account Receivable/Invoice and the value of the data or computer software involved in the offense or the loss to the victim was one hundred fifty thousand dollars or more and/or the offense was committed for the purpose of devising or executing a scheme to defraud or to obtain property or services and the value of the property or services or the loss to the victim was seven thousand five hundred dollars or more.

DEL MONTE INVOICE (FAKE) FOR 161,700.00 DATED FEBRUARY 8,2019

**INCIDENT SEVEN HUNDRED EIGHTY-EIGHT: TAMPERING WITH RECORDS,  
2913.42 F-3**

**Defendants** James DelVerne, Colleen Hall

**Date of Offense** On or about March 22, 2019

The Defendant(s) unlawfully did, knowing the defendant had no privilege to do so, and with purpose to defraud or knowing the defendant was facilitating a fraud on WATERFORD BANK falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Account Receivable/Invoice and the value of the data or computer software involved in the offense or the loss to the victim was one hundred fifty thousand dollars or more and/or the offense was committed for the purpose of devising or executing a scheme to defraud or to obtain property or services and the value of the property or services or the loss to the victim was seven thousand five hundred dollars or more.

MARCH 22, 2019 DEL MONTE ACCOUNT RECEIVABLE INVOICE (FAKE) FOR 181,500.00

**INCIDENT SEVEN HUNDRED EIGHTY-NINE: THEFT OF MORE THAN ONE  
MILLION FIVE HUNDRED THOUSAND F-1**

**Defendants** James DelVerne

**Date of Offense** On or about September 13, 2019

The Defendant unlawfully did with purpose to deprive the owner, Series 10 of Cadence Group Platform LLC, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one million five hundred thousand dollars or more.

STEALING \$5,251,768.80 FROM SERIES 10 OF CADENCE GROUP PLAT FORM BY DECEPTION --USE OF FALSE ACCOUNT RECEIVABLES

**INCIDENT SEVEN HUNDRED NINETY: TELECOMMUNICATIONS FRAUD F-1**

**Defendants** James DelVerne  
**Date of Offense** On or about September 13, 2019

The Defendant unlawfully 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 with purpose to execute or otherwise further the scheme to defraud and the value of the benefit obtained by the offender or of the detriment to the victim of the fraud is one million or more.

FRAUD BEING LOAN SECURED BY FAKE ACCOUNT RECEIVABLES CREATED IN TOLEDO, LUCAS COUNTY, OHIO

**INCIDENT SEVEN HUNDRED NINETY-ONE: AGGRAVATED THEFT F-2**

**Defendants** James DelVerne, John T. Walters  
**Date of Offense** On or about October 29, 2020

The Defendant(s) unlawfully did with purpose to deprive the owner, MV ST FUND III LLC (MV), of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven hundred fifty thousand dollars or more and less than one million five hundred thousand dollars. FIRST NOTE BETWEEN MV ST FUND 111 LLC AND WINDING CREEK PARTNERS LLC 250,000.00, WALTERS IS COMPLICIT

**INCIDENT SEVEN HUNDRED NINETY-TWO: MONEY LAUNDERING F-3**

**Defendants** James DelVerne  
**Date of Offense** On or about October 29, 2020

The Defendant unlawfully did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity.

WIRING STOLEN MONEY TO ENTITIES RELATED TO WINDING CREEK PARTNERS OR OTHER ENTITIES WHICH DELVERNE AND ANOTHER CONTROLLED OR WERE ASSOCIATED WITH

**INCIDENT SEVEN HUNDRED NINETY-THREE: MONEY LAUNDERING F-3**

**Defendants** James DelVerne  
**Date of Offense** On or about December 10, 2020

The Defendant unlawfully did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity.

AFTER RECEIVING \$614,000.00 FROM MV ST FUND 111. THE FUNDS WERE THEN TRANSFERRED BY WINDING CREEK PARTNERS TO OTHER ENTITIES CONTROLLED, OWNED OR MANAGED BY THE DEFENDANT AND HIS ASSOCIATES

**INCIDENT SEVEN HUNDRED NINETY-FOUR: TELECOMMUNICATIONS FRAUD,  
2913.02 F-2**

**Defendants** James DeVerne, John T. Walters  
**Date of Offense** On or about 10/29/2020 through 12/10/2020

The Defendant(s) unlawfully 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 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.

AFTER STEALING MONEY FROM MV ST FUND III WINDING CREEK PARTNERS WIRED THE FUNDS TO OTHER ENTITIES IT OWNED, CONTROLLED OR MANAGED OR THAT THE DEFENDANT DEL VERNE, OWNED, CONTROLLED OR MANAGED.

**INCIDENT SEVEN HUNDRED NINETY-FIVE: FALSE REPRESENTATION IN THE  
SALE OF A SECURITY F-1**

**Defendants** James DeVerne, John T. Walters  
**Date of Offense** On or about October 30, 2020

The Defendant unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

PROMISSORY NOTE IN EXCESS OF 150,000.00

**INCIDENT SEVEN HUNDRED NINETY-SIX: FALSE REPRESENTATION IN THE  
SALE OF A SECURITY F-1**

**Defendants** James DeVerne  
**Date of Offense** On or about December 10, 2020

The Defendant unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

\$452,000.00 PROMISSORY NOTE

**INCIDENT SEVEN HUNDRED NINETY-SEVEN: FALSE REPRESENTATION IN THE SALE OF A SECURITY F-1**

**Defendants** James DelVerne  
**Date of Offense** On or about February 4, 2021

The Defendant unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

Patrick Kenney Investment --\$200,000.00

**INCIDENT SEVEN HUNDRED NINETY-EIGHT: FALSE REPRESENTATION IN THE SALE OF A SECURITY F-1**

**Defendants** James DelVerne  
**Date of Offense** On or about June 15, 2020

The Defendant unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

Patrick Kenney \$700,000.00 investment

**INCIDENT SEVEN HUNDRED NINETY-NINE: FALSE REPRESENTATION IN THE SALE OF A SECURITY F-1**

**Defendants** James DelVerne  
**Date of Offense** On or about February 4, 2021

The Defendant unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

Patrick Kenney \$500,000.00 investment

**INCIDENT EIGHT HUNDRED: FALSE REPRESENTATION IN THE SALE OF A SECURITY F-1**

**Defendants** James DelVerne  
**Date of Offense** On or about November 14, 2020

The Defendant unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state.

Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

Patrick Kenney \$250,000.00

**INCIDENT EIGHT HUNDRED ONE: FALSE REPRESENTATION IN THE SALE OF A SECURITY F-1**

**Defendants** James DelVerne

**Date of Offense** On or about December 18, 2019

The Defendant unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more. John Eddingfield --\$250,000 investment

**INCIDENT EIGHT HUNDRED TWO: FALSE REPRESENTATION IN THE SALE OF A SECURITY F-1**

**Defendants** James DelVerne

**Date of Offense** On or about July 10, 2020

The Defendant unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

John Eddingfield--\$392,756.15

**INCIDENT EIGHT HUNDRED THREE: FALSE REPRESENTATION IN THE SALE OF A SECURITY F-3**

**Defendants** James DelVerne

**Date of Offense** On or about July 10, 2020

The Defendant unlawfully did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

John Eddingfield 23,405.22

**INCIDENT EIGHT HUNDRED FOUR: THEFT OF ONE MILLION FIVE HUNDRED THOUSAND DOLLARS OR MORE F-1**

**Defendants** James DelVerne

**Date of Offense** On or about 6/15/2020 through 1/13/2022

The Defendant unlawfully did with purpose to deprive the owner, Patrick Kenny, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one million five hundred thousand dollars or more.

Patrick Kenny--2,300,000.00.

**INCIDENT EIGHT HUNDRED FIVE: THEFT OF ONE MILLION FIVE HUNDRED THOUSAND DOLLARS OR MORE F-1**

**Defendants** James DelVerne

**Date of Offense** On or about 6/15/2020 through 1/13/2022

The Defendant unlawfully did with purpose to deprive the owner, Patrick Kenney, of property or services, to wit: money, 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. Furthermore, the property or services stolen is valued at one million five hundred thousand dollars or more. Patrick Kenney--2,300,000.00

**INCIDENT EIGHT HUNDRED SIX: AGGRAVATED THEFT F-2**

**Defendants** James DelVerne

**Date of Offense** On or about July 10, 2022

The Defendant unlawfully did with purpose to deprive the owner, John Eddingfeld, of property or services, to wit: money, 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. Furthermore, the property or services stolen is valued at seven hundred fifty thousand dollars or more and less than one million five hundred thousand dollars.

John Eddingfeld 782,817.00

**INCIDENT EIGHT HUNDRED SEVEN : AGGRAVATED THEFT 2913.02 F-2**

**Defendants** James DelVerne

**Date of Offense** On or about July 10, 2020

The Defendant unlawfully did with purpose to deprive the owner, John Eddingfeld, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven hundred fifty thousand dollars or more and less than one million five hundred thousand dollars.

John Eddingfeld --782,817.

**INCIDENT EIGHT HUNDRED EIGHT : AGGRAVATED THEFT 2913.02 F-3**

**Defendants** James DelVerne

**Date of Offense** On or about January 31, 2016

The Defendant unlawfully did with purpose to deprive the owner, Dale and Ellen Vermilya, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

Dale and Ellen Vermilya-- \$200,000.00

**INCIDENT EIGHT HUNDRED NINE : AGGRAVATED THEFT 2913.02 F-3**

**Defendants** James DelVerne

**Date of Offense** On or about January 31, 2016

The Defendant unlawfully did with purpose to deprive the owner, Dale and Ellen Vermilya, of property or services, to wit: money, 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. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

Dale and Ellen Vermilya --\$200,000.00

**INCIDENT EIGHT HUNDRED TEN: AGGRAVATED THEFT 2913.02 F-3**

**Defendants** James DelVerne

**Date of Offense** On or about 10/6/2016 through 3/16/2018

The Defendant unlawfully did with purpose to deprive the owner, Bruce Lucki, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

Bruce Lucki--\$500,000.00

**INCIDENT EIGHT HUNDRED ELEVEN : AGGRAVATED THEFT 2913.02 F-3**

**Defendants** James DelVerne

**Date of Offense** On or about 10/6/2017 through 3/16/2018

The Defendant unlawfully did with purpose to deprive the owner, Bruce Lucki, of property or services, to wit: money, 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. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more.

Bruce Lucki--\$500,000.00

**INCIDENT EIGHT HUNDRED TWELVE : AGGRAVATED THEFT 2913.02 F-2**

**Defendants** James DelVerne  
**Date of Offense** On or about July 1, 2014

The Defendant unlawfully did with purpose to deprive the owner, Clark Weidaw, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.  
Clark Weidaw--120,000.00

**INCIDENT EIGHT HUNDRED THIRTEEN : GRAND THEFT 2913.02 F-4**

**Defendants** James DelVerne  
**Date of Offense** On or about July 1, 2014

The Defendant unlawfully did with purpose to deprive the owner, Clark Weidaw, of property or services, to wit: money, 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. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.  
Clark Weidaw--120,000.00

**INCIDENT EIGHT HUNDRED FOURTEEN : MONEY LAUNDERING 1315.55 F-3**

**Defendants** Gary Rathbun, Doug Miller, Nancy Rathbun  
**Date of Offense** On or about April 17, 2017

The Defendant(s) unlawfully 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 intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law.  
7,000.00 transfer from an entity to MDM LTD to Nancy Rathbun

**INCIDENT EIGHT HUNDRED FIFTEEN : MONEY LAUNDERING 1315.55 F-3**

**Defendants** Gary Rathbun, Doug Miller, Nancy Rathbun  
**Date of Offense** On or about June 2, 2017

The Defendant(s) unlawfully 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 intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law.  
9,000.00 transfer from a company to MDM let to Nancy Rathbun

**INCIDENT EIGHT HUNDRED SIXTEEN : MONEY LAUNDERING 1315.55 F-3**

**Defendants** Gary Rathbun, Doug Miller, Nancy Rathbun

**Date of Offense** On or about June 29, 2017

The Defendant(s) unlawfully 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 intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law.

9,000.00 transfer from a company to MDM let to Nancy Rathbun

**INCIDENT EIGHT HUNDRED SEVENTEEN : MONEY LAUNDERING 1315.55 F-3**

**Defendants** Gary Rathbun, Doug Miller, Nancy Rathbun

**Date of Offense** On or about July 12, 2017

The Defendant(s) unlawfully 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 intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law.

8,500.00 transfer from a company to MDM let to Nancy Rathbun

**INCIDENT EIGHT HUNDRED EIGHTEEN : MONEY LAUNDERING 1315.55 F-3**

**Defendants** Gary Rathbun, Doug Miller, Nancy Rathbun

**Date of Offense** On or about September 1, 2017

The Defendant(s) unlawfully 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 intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law.

8,000.00 transfer from a company to MDM let to Nancy Rathbun

**INCIDENT EIGHT HUNDRED NINETEEN : MONEY LAUNDERING 1315.55 F-3**

**Defendants** Gary Rathbun, Doug Miller, Nancy Rathbun

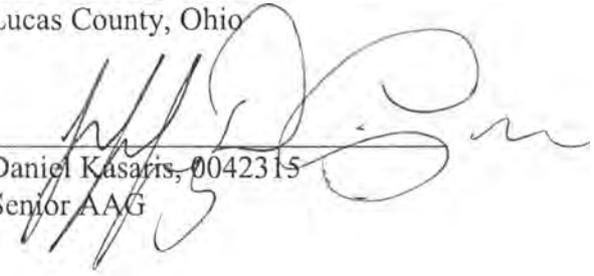
**Date of Offense** On or about September 22, 2017

The Defendant(s) unlawfully 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 intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law.

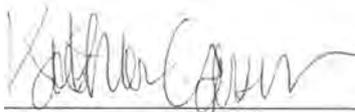
All of the above conduct being contrary to the form of the statute in such cases made and provided, and against the peace and dignity of the State of Ohio.

AT LEAST ONE OF THE INCIDENTS OF CORRUPT ACTIVITY IS A FELONY OF THE FIRST DEGREE IF CHARGED SEPARATE MAKING THE ENGAGING IN PATTERN OF CORRUPT ACTIVITY A FELONY OF THE FIRST DEGREE WITH A MANDATORY ELEVEN YEAR PRISON SENTENCE. THE ENGAGING IN PATTERN OF CORRUPT ACTIVITY FURTHER CONTAINS INCIDENTS OF CORRUPT ACTIVITIES THAT ARE FELONIES OF THE 1<sup>ST</sup>, 2<sup>ND</sup> AND/OR 3<sup>RD</sup> DEGREE.

Dave Yost  
Ohio Attorney General  
Lucas County, Ohio

  
Daniel Kasaris, 0042315  
Senior AAG

A TRUE BILL.

  
\_\_\_\_\_  
FOREPERSON OF THE GRAND JURY

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.