

IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, OHIO

STATE OF OHIO,

Plaintiff

VS.

**BILL OF INFORMATION**

TRACY MURNANE,

Defendant

On this day in open Court appeared the undersigned Prosecuting Attorney of Delaware County, Ohio, or in her name by an Assistant Prosecuting Attorney, who being first duly cautioned and sworn, charges and says that the facts set forth herein are true and correct, as he or she believes:

**Count One**

Tracy Murnane, on or about the 23rd day of April, 2014 through the 11th day of March, 2020, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did with purpose to deprive the owner, Columbus Zoo, of property or services, to wit: Money, knowingly obtain or exert control over either the property or services by deception in violation of Ohio Revised Code §2913.02(A)(3), 2913.02(B)(2), **Grand Theft**, a felony of the fourth degree.

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

This theft charge is an aggregation of the following conduct:

1. Selling personal cars to the Columbus Zoo using a straw seller.
2. On rare occasions, using the Columbus Zoo Barter System for personal purchases.
3. On rare occasions, attending events at Nationwide Arena or the Schottenstein Center using tickets the Columbus Zoo paid for.
4. Uptown Signs a Sign Company

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

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### Count Two

Tracy Murnane, on or about the June 22, 2017 to March 1, 2020 in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did act with the kind of culpability required for the commission of an offense and did aid or abet another in committing the offense of Theft a felony of the Fourth Degree, did aid or abet Thomas Stalf in expending \$45,000.00 of Columbus Zoo funds to purchase a 2009 Ford F-53 RV for Mr. Stalf's personal use, with the underlying offense being theft beyond the scope R.C. Section 2913.02 in violation of §2923.03(A)(2), 2923.03(F), **Complicity in the Commission of an Offense, Theft of a Motor Vehicle.**

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

### Count Three

Tracy Murnane, on or about the 7<sup>th</sup> day of August 2019, in the county of Delaware or by some enumerated in Section 2901.12 of the Ohio Revised Code whereby venue is placed in Delaware County, Ohio did with purpose to defraud, or knowing that the person is facilitating a fraud: (2) Forge any writing so that it purports to be genuine when it actually is spurious, or to have been executed at a time or place or with terms different from what in fact was the case in violation of Ohio Revised Code Section 2913.31(a)(2) 2913.31(c)(1)(b)(i) **Forgery**, a felony of the Fourth Degree when the value of the property is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars. This pertains to forging a car title or car transfer paperwork for a 1967 Camaro on the above date.

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

### Count Four

Tracy Murnane, on or about the 24th day of September, 2018, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, having devised a scheme to defraud, did knowingly

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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 in violation of Ohio Revised Code §2913.05(A), 2913.05(C), **Telecommunications Fraud**, a felony of the fifth degree. Via the investigation and forensic audit, a September 24, 2018, IMS barter purchase at R Man Van Limo & Luxury Car Service was found in the amount of \$503.74 (\$473 in barter dollars and \$30.74 in cash fees paid by the Zoo) for limousine service on October 13, 2018. This transaction was subsequently linked to Murnane booking a party bus for his son's wedding. Investigators located a series of emails between Murnane and this business finalizing the itinerary as well as a photo of the wedding party inside the bus.

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

#### **Count Five**

Tracy Murnane, on or about the 15th day of April, 2020, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did knowingly fail to file a return or report required to be filed by Chapter 5747.19 of the Revised Code in violation of Ohio Revised Code §5747.19, 5747.99(A), **Filing Incomplete, False and Fraudulent Returns**, a felony of the fifth degree.

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

#### **Count Six**

Tracy Murnane, on or about the 7th day of August, 2019, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did buy or otherwise acquire a motor vehicle without obtaining a certificate of title for it in his name in accordance with Chapter 4505 in violation of Ohio Revised Code §4505.03, 4505.99, 2901.02(F), **Certificate of Title**, an unclassified misdemeanor.

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

### **Count Seven**

Tracy Murnane, on or about the 16th day of October, 2019 through the 19th day of April, 2021, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did buy or otherwise acquire a motor vehicle without obtaining a certificate of title for it in his name in accordance with Chapter 4505 in violation of Ohio Revised Code §4505.03, 4505.99, 2901.02(F), **Certificate of Title**, an unclassified misdemeanor. This count concerns title skipping for the following vehicles: a 2001 Corvette, a 2009 Chevrolet PT, a 2000 Corvette, a 1968 Corvette, a 1996 Corvette and a 1965 Ford. In all cases after the vehicle was purchased by the defendant, he failed to obtain a title in his name for the vehicle instead he restored the vehicle had the title placed in the name of a third person, sold the vehicle and split the proceeds with the third person and another.

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

### **Count Eight**

Tracy Murnane, on or about the 27th day of August 2020, in the county of Delaware or by some enumerated in Section 2901.12 of the Ohio Revised Code whereby venue is placed in Delaware County, Ohio did with purpose to defraud, or knowing that the person is facilitating a fraud: (2) Forge any writing so that it purports to be genuine when it actually is spurious, or to have been executed at a time or place or with terms different from what in fact was the case, in violation of Ohio Revised Code Section 2913.31(a)(2) 2913.31(c)(1)(b)(i) **Forgery**, a felony of the Fourth Degree when the value of the property is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars. This pertains to forging a car title or car transfer paperwork for a 1973 Ford Mustang.

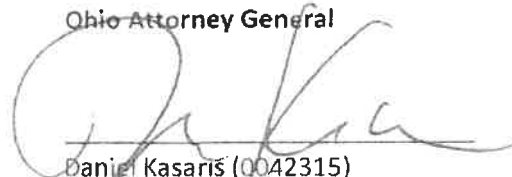
*The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.*

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Respectfully Submitted,

**Dave Yost**

Ohio Attorney General

A handwritten signature in black ink, appearing to read 'DK', written over a horizontal line.

Daniel Kasaris (0042315)

Special Delaware County Prosecutor

Sr. Assistant Ohio Attorney General

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