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CINDY A. HOFNER



Court of Common Pleas, Wood County, Ohio
Criminal Division

State of Ohio, Plaintiff vs. Harold Jason Craig, Defendant	A True Bill Indictment Crim. Rule 6, 7
The Term Of September of 2018	Case Number 18CR437

The State of Ohio, }
Wood County } ss.

Count One Engaging in a Pattern of Corrupt Activity - F1
§2923.32(A)(1), 2923.32(B)(1)
Defendant Harold Jason Craig
Date of Offense On or about August 1, 2012 to December 31, 2015

The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, in the name and by the authority the State of Ohio, do find and present, that the above named Defendant(s), on or about the date(s) of the offense set forth above, in Wood County, 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 or the collection of an unlawful debt, to wit: ..

Furthermore, at least one of the incidents of corrupt activity was a felony of the first, second, or third degree, aggravated murder, or murder, or at least one of the incidents was a felony under the law of this state that was committed prior to July 1, 1996, and constituted a felony of the first, second, or third degree, aggravated murder, or murder or was committed on or after July 1, 1996, or one of the incidents of corrupt activity was a felony under the law of the United States or of another state that, if committed in this state on or after July 1, 1996, would have constituted a felony of the first, second, or third degree, aggravated murder, or murder under the law of this state, to wit: ..

while employed by, or associated with, any enterprise did conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity or the collection of an unlawful debt.

ENTERPRISE DEFINED. THE JURORS OF THE GRAND JURY further find and present that the Enterprise included two or more of the following persons and/or entities associated in fact:

1. Harold Jason Craig
2. Kristie L. Koester
3. Perrysburg Heights Community Association (Victim)
4. PNC Bank
5. Huntington Bank
6. Key Bank
7. Genoa Bank
8. PayPal
9. EBay
10. Visalus
11. Wood County Sheriff's Office (Victim)
12. Other individuals and/or businesses, illicit and/or licit, known, unknown and/or as-yet unidentified.

ENTERPRISE LIABILITY. THE JURORS OF THE GRAND JURY further find and present that the defendant is criminally liable as a principal offender and/or complicitor, jointly and severally, for the incidents of corrupt activity committed by other members of the Enterprise.

VALUE. THE JURORS OF THE GRAND JURY further find and present that the proceeds of the violation(s), the payments made in the violation(s), the amount of a claim(s) for payment(s) or for any other benefit that was false or deceptive and that was involved in the violation(s), or the value of the contraband or other property illegally possessed, sold, or purchased in the violation(s) exceeds one thousand dollars, or any combination of violations described in R.C. 2923.31(I)(2)(c) when the total proceeds of the combination of violations, payments made in the combination of violations, amount of the claims for payment or for other benefits that was false or deceptive and that was involved in the combination of violations, or value of the contraband or other property illegally possessed, sold, or purchased in the combination of violations exceeded one thousand dollars.

INCIDENTS OF CORRUPT ACTIVITY. THE JURORS OF THE GRAND JURY further find

and present that the defendant committed, attempted to commit, conspired to commit, or solicited, coerced, or intimidated another person to engage in the commission of, at least two or more incidents of "corrupt activity", as that term is defined in R.C. 2923.31(I), namely the following incidents:

Incident One

On or about August 1, 2012 to December 31, 2015, Harold Jason Craig, in Wood County, did with purpose to deprive the owner, Perrysburg Heights Community Association, of \$238,360.31, knowingly obtain or exert control over the property beyond the scope of the express or implied consent of the owner or person authorized to give content. The aforementioned conduct constituted and/or involved a violation of R.C. 2913.02(A), 2913.02(B), Aggravated Theft, a felony of the third degree.

Incident Two

On or about September 24, 2012, Harold Jason Craig, in Wood County, deposited \$2,939.95, which was a commission for the sale of Visalus Products for Perrysburg Heights Community Association, into a personal account at Genoa Bank over which he had control. The aforementioned conduct constituted and/or involved a violation of R.C. 1315.55(A), 1315.99(C), Money Laundering, a felony of the third degree.

Incident Three

On or about October 11, 2012, Harold Jason Craig, in Wood County, purchased three parcels of land from the Wood County Sheriff's Office with check #228 from a personal account at Genoa Bank over which he had control. The aforementioned conduct constituted and/or involved a violation of R.C. 1315.55(A), 1315.99(C), Money Laundering, a felony of the third degree.

Incident Four

On or about December 19, 2012, Harold Jason Craig, in Wood County, withdrew \$25,000 from the Perrysburg Heights Community Association's Key Bank account. The aforementioned conduct constituted and/or involved a violation of R.C. 1315.55(A), 1315.99(C), Money Laundering, a felony of the third degree and R.C. 2913.02(A), 2913.02(B), Theft, a felony of the fourth degree.

Incident Five

On or about December 19, 2012, Harold Jason Craig, in Wood County, deposited \$25,000 into a personal account at Huntington Bank over which he had control. The aforementioned conduct constituted and/or involved a violation of R.C. 1315.55(A), 1315.99(C), Money

Laundering, a felony of the third degree.

Incident Six

On or about December 20, 2012, Harold Jason Craig, in Wood County, wrote check #1008 from his personal account at Huntington Bank in the amount of \$13,000 to the Wood County Sheriff's Office. The aforementioned conduct constituted and/or involved a violation of R.C. 1315.55(A), 1315.99(C), Money Laundering, a felony of the third degree.

Incident Seven

On or about October 22, 2012, Harold Jason Craig, in Wood County, did with purpose to deprive the owner, Perrysburg Heights Community Association, withdrew \$1,200, from Perrysburg Heights Community Association's Key Bank account. The aforementioned conduct constituted and/or involved a violation of R.C. 2913.02(A), 2913.02(B), Theft, a felony of the fifth degree.

Incident Eight

On or about November 2, 2012, Harold Jason Craig, in Wood County, did with purpose to deprive the owner, Perrysburg Heights Community Association, withdrew \$1,000, from Perrysburg Heights Community Association's Key Bank account. The aforementioned conduct constituted and/or involved a violation of R.C. 2913.02(A), 2913.02(B), Theft, a felony of the fifth degree.

Incident Nine

On or about November 8, 2012, Harold Jason Craig, in Wood County, did with purpose to deprive the owner, Perrysburg Heights Community Association, withdrew \$7,000, from Perrysburg Heights Community Association's Key Bank account. The aforementioned conduct constituted and/or involved a violation of R.C. 2913.02(A), 2913.02(B), Theft, a felony of the fifth degree.

Incident Ten

On or about December 19, 2012, Harold Jason Craig, in Wood County, did with purpose to deprive the owner, Perrysburg Heights Community Association, withdrew \$5,000, from Perrysburg Heights Community Association's Key Bank account. The aforementioned conduct constituted and/or involved a violation of R.C. 2913.02(A), 2913.02(B), Theft, a felony of the fifth degree.

Incident Eleven

On or about August 9, 2013, Harold Jason Craig, in Wood County, did with purpose to deprive the owner, Perrysburg Heights Community Association, withdrew \$4,000 from, Perrysburg Heights Community Association's Key Bank account. The aforementioned

conduct constituted and/or involved a violation of R.C. 2913.02(A), 2913.02(B), Theft, 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 Two **Aggravated Theft - F3**
§2913.02(A)(2), 2913.02(B)(2)

Defendant Harold Jason Craig

Date of Offense On or about August 1, 2011 to December 31, 2015

The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, in the name and by the authority the State of Ohio, do find and present, that the above named Defendant(s), on or about the date(s) of the offense set forth above, in Wood County, unlawfully

did with purpose to deprive the owner, Perrysburg Heights Community Association, of \$238,360.31 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.

Furthermore, the property or services stolen is valued at \$100,000 or more and less than \$500,000.

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 **Money Laundering - F3**
§1315.55(A)(3), 1315.99(C)

Defendant Harold Jason Craig

Date of Offense On or about September 24, 2012

The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, in the name and by the authority the State of Ohio, do find and present, that the above named Defendant(s), on or about the date(s) of the offense set forth above, in Wood County, 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.

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 **Money Laundering - F3**
 §1315.55(A)(3), 1315.99(C)
Defendant Harold Jason Craig
Date of Offense On or about October 11, 2012

The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, in the name and by the authority the State of Ohio, do find and present, that the above named Defendant(s), on or about the date(s) of the offense set forth above, in Wood County, 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.

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 **Money Laundering - F3**
 §1315.55(A)(3), 1315.99(C)
Defendant Harold Jason Craig
Date of Offense On or about December 19, 2012

The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, in the name and by the authority the State of Ohio, do find and present, that the above named Defendant(s), on or about the date(s) of the offense set forth above, in Wood County, 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.

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 **Money Laundering - F3**
 §1315.55(A)(3), 1315.99(C)
Defendant Harold Jason Craig
Date of Offense On or about December 20, 2012

The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, in the name and by the authority the State of Ohio, do find and present, that the above named Defendant(s), on or about the date(s) of the offense set forth above, in Wood County, 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.

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.

State of Ohio vs.

Harold Jason Craig, DOB: 07/20/1974, SSN:

SSN. Pursuant Sup. R. 44

- Count 1: ORC 2923.32(A)(1), 2923.32(B)(1), F1, Engaging in a Pattern of Corrupt Activity
- Count 2: ORC 2913.02(A)(2), 2913.02(B)(2), F3, Aggravated Theft
- Count 3: ORC 1315.55(A)(3), 1315.99(C), F3, Money Laundering
- Count 4: ORC 1315.55(A)(3), 1315.99(C), F3, Money Laundering
- Count 5: ORC 1315.55(A)(3), 1315.99(C), F3, Money Laundering
- Count 6: ORC 1315.55(A)(3), 1315.99(C), F3, Money Laundering



Paul A. Dobson #0064126
Wood County Prosecutor

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A TRUE BILL



Foreperson of the Grand Jury