

UMJ

IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, OHIO

STATE OF OHIO,

23 CR109 053R

Plaintiff

VS.

INDICTMENT

2023 SEP 18 PM 2:51  
DELAWARE COUNTY OHIO  
COMMON PLEAS COURT  
FILED

PETER A. FINGERHUT  
THOMAS E. STALF  
GREGORY A. BELL,

Defendants.

On the term, Term III  
Special Session

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

Thomas E. Stalf and Peter A. Fingerhut, on or about 2/23/2011 through 8/18/2021, in Delaware County 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, The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association, of property or services, to wit: money/assets, knowingly obtain or exert control over either the property or services by deception, and the value of the property or services stolen more than one million five hundred thousand dollars or more, in violation of 2913.02(A)(3), 2913.02(B)(2) of the Ohio Revised Code, **Aggravated Theft**, a felony of the first 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:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Gregory A. Bell, on or about 1/1/2011 and continuing through 5/1/2021 in Delaware County 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, The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association, of money/assets or services, knowingly obtain or exert control over either the property or services by deception, the value of the property or services stolen being more than \$500,000.00 or more, but less than \$1,000,000.00, in violation of Ohio Revised Code §2913.02(A)(3), 2913.02(B)(2) of the Ohio Revised Code, **Aggravated Theft**, a felony of the second degree.

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

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

Peter A. Fingerhut, on or about December 18, 2018, in Delaware County 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 solicit or accept for himself or another person any valuable thing or valuable benefit, to wit: \$10,000.00, to corrupt or improperly influence him or another public servant or party official with respect to the discharge of his or the other public servant's or party official's duty, either before or after he was elected, appointed, qualified, employed, summoned, or sworn as a public servant or party official, in violation of Ohio Revised Code §2921.02, **Bribery**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about December 18, 2019, in Delaware County 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 solicit or accept for himself or another person any valuable thing or valuable benefit, to wit: \$10,000.00, to corrupt or improperly influence him or another public servant or party official with respect to the discharge of his or the other public servant's or party official's duty, either before or after he was elected, appointed, qualified, employed, summoned, or sworn as a public servant or party official, in violation of Ohio Revised Code §2921.02, **Bribery**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about December 18, 2018, in Delaware County 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 induce another to do an unlawful act expose or threaten to expose any matter tending to subject Business 1 to hatred, contempt, or ridicule, or to damage Business 1's personal or business repute, or to impair Business 1's credit, in violation of Ohio Revised Code §2905.11(A)(5), **Extortion**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about December 18, 2019, in Delaware County 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 induce another to do an unlawful act expose or threaten to expose any matter tending to subject Business 1 to hatred, contempt, or ridicule, or to damage Business 1's personal or business repute, or to impair Business 1's credit, in violation of Ohio Revised Code §2905.11(A)(5), **Extortion**, a felony of the third degree.

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

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

Thomas E. Stalf, on or about April 15, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on United States/IRS/United States Department of Treasury falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2016 Federal Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the third degree.

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

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

Thomas E. Stalf, on or about April 15, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on State of Ohio falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2016 State of Ohio Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about April 15, 2016, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on United States/IRS/United States Department of Treasury falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2015 Federal Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about April 15, 2016, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on State of Ohio falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2016 State of Ohio Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about April 15, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on United States/IRS/United States Department of Treasury falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2016 Federal Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity, in

violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about April 15, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on State of Ohio falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2017 State Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about April 15, 2018, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on United States/IRS/United States Department of Treasury falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2017 Federal Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about April 15, 2018, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on the State of Ohio falsify, destroy, remove, conceal,

alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2017 State of Ohio Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity, in violation of Ohio Revised Code, §2913.42, **Tampering with Records**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about April 15, 2020, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on the United States/IRS/United States Department of Treasury falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2019 Federal Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about April 15, 2020, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on State of Ohio falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2019 State of Ohio Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the third degree.

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

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

Gregory A. Bell, on or about November 6, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in

Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Credit Card Authorization Form 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, in violation of Ohio Revised Code Section 2913.42, **Tampering with Records**, a felony of the fourth 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 Eighteen:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about October 23, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Credit Card Authorization Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Nineteen:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf and Peter A. Fingerhut, on or about January 17, 2015, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing they had no privilege to do so, and with purpose to defraud or knowing they were facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association, falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoo Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fifth degree.

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

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

Thomas E. Stalf, on or about March 11, 2015, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form, and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Twenty-One:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf and Peter A. Fingerhut, on or about April 4, 2016, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing they had no privilege to do so, and with purpose to defraud or knowing they were facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form 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, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth 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 Twenty-Two:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf, on or about January 31, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage



Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Twenty-Three:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf and Gregory A. Bell in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing they had no privilege to do so, and with purpose to defraud or knowing they were facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form 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, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth 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 Twenty-Four:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf, on or about June 9, 2015, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form 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 dollar, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth 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 Twenty-Five:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf, on or about July 13, 2015, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollar, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fifth degree.

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

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

Thomas E. Stalf, on or about September 28, 2015, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Twenty-Seven:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about September 30, 2015, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars,

in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Twenty-Eight:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf and Peter A. Fingerhut, on or about December 4, 2015, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing they had no privilege to do so, and with purpose to defraud or knowing they were facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code § 2913.42, **Tampering with Records**, 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 Twenty-Nine:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf, on or about January 6, 2016, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Thirty:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about April 20, 2016, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Thirty-One:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf and Gregory A. Bell, on or about April 26, 2016, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form 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, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth 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 Thirty-Two:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about July 30, 2016, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Thirty-Three:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about September 3, 2016, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Thirty-Four:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf, on or about February 3, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Thirty-Five:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf, on or about February 8, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in

Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Thirty-Six:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about May 1, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Thirty-Seven:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Gregory A. Bell, on or about May 1, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form 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, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth 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 Thirty-Eight:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf and Peter A. Fingerhut, on or about June 18, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form 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, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth 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 Thirty-Nine:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf and Gregory A. Bell, on or about June 18, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form 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, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth 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 Forty:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about July 28, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any

writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fifth degree.

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

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

Peter A. Fingerhut, on or about July 28, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Forty-Two:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf, on or about October 11, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Forty-Three:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Gregory A. Bell, on or about November 6, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form 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, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth degree.

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

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

Gregory A. Bell, on or about December 29, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, 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 Forty-Five:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about January 20, 2018, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage

Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth 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 Forty-Six:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf, Gregory A. Bell, and Peter A. Fingerhut, on or about September 20, 2016, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Check Request Form 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, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth 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 Forty-Seven:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Gregory A. Bell and Peter A. Fingerhut, on or about August 16, 2016, , in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Check Request Form 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, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth 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 Forty-Eight:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Gregory A. Bell and Peter A. Fingerhut, on or about November 22, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Check Request Form 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, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth 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 Forty-Nine:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Gregory A. Bell and Peter A. Fingerhut, on or about September 1, 2017, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Check Request Form 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, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth 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 Fifty:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas A. Stalf, Gregory A. Bell and Peter A. Fingerhut, on or about August 21, 2018, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Check Request Form 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, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth degree.

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

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

Peter A. Fingerhut, on or about August 21, 2018, in Delaware County or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Invoice from The Ohio State University 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, in violation of Ohio Revised Code §2913.42, **Tampering with Records**, a felony of the fourth 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 Fifty-Two:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf, on or about the 8th day of February, 2017, 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, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Columbus Zoo and Aquarium falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Credit Card Authorization Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars in violation of Ohio Revised Code §2913.42(A)(1), 2913.42(B)(3)(b), **Tampering with Records**, 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 Fifty-Three:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut and Thomas E. Stalf, on or about the 19th day of September, 2017, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a

wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image 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 seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars in violation of Ohio Revised Code §2913.05(A), 2913.05(B); 2913.05(C), **Telecommunications Fraud**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about the 19th day of July, 2016, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image 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 thousand dollars or more but less than seven thousand five hundred dollars in violation of Ohio Revised Code §2913.05(A), 2913.05(B); 2913.05(C), **Telecommunications Fraud**, a felony of the fourth 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 Fifty-Five:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about the 12th day of April, 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, 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 seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars in violation of Ohio Revised Code §2913.05(A), 2913.05(B); 2913.05(C), **Telecommunications Fraud**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about the 7th day of May, 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, 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 thousand dollars or more but less than seven thousand five hundred dollars in violation of Ohio Revised Code §2913.05(A), 2913.05(B); 2913.05(C), **Telecommunications Fraud**, a felony of the fourth 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 Fifty-Seven:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about the 7th day of May, 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, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Columbus Zoo and Aquarium falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: An Invoice and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars in violation of Ohio Revised Code §2913.42(A)(1), 2913.42(B)(3)(b), **Tampering with Records**, 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 Fifty-Eight:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about the 15th day of July, 2014, 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 knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Columbus Zoo and Aquarium falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Dublin Irish Festival Invoice and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars in violation of Ohio Revised Code §2913.42(A)(1), 2913.42(B)(3)(b), **Tampering with Records**, 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 Fifty-Nine:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about the 4th day of December, 2015, 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, knowing he} had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Columbus Zoo and Aquarium falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Dublin Irish Festival Invoice and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars in violation of Ohio Revised Code §2913.42(A)(1), 2913.42(B)(3)(b), **Tampering with Records**, 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 Sixty:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about the 18th day of July, 2016, 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, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Columbus Zoo and Aquarium falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit:

Dublin Irish Festival Invoice and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars in violation of Ohio Revised Code §2913.42(A)(1), 2913.42(B)(3)(b), **Tampering with Records**, 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 Sixty-One:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about the 16th day of December, 2016, 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, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Columbus Zoo and Aquarium falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Dublin Irish Festival 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 in violation of Ohio Revised Code §2913.42(A)(1), 2913.42(B)(3)(c), **Tampering with Records**, a felony of the fourth 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 Sixty-Two:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut and Thomas E. Stalf, on or about the 11th day of December, 2017, 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, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Columbus Zoo and Aquarium falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Dublin Irish Festival 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 in violation of Ohio Revised Code §2913.42(A)(1), 2913.42(B)(3)(c), **Tampering with Records**, a felony of the fourth 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 Sixty-Three:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*



Peter A. Fingerhut, on or about the 17th day of December, 2017, 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, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Columbus Zoo and Aquarium falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Dublin Irish Festival 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 in violation of Ohio Revised Code §2913.42(A)(1), 2913.42(B)(3)(c), **Tampering with Records**, a felony of the fourth 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 Sixty-Four:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about the 10th day of December, 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, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Columbus Zoo and Aquarium falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Dublin Irish Festival Invoice and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars in violation of Ohio Revised Code §2913.42(A)(1), 2913.42(B)(3)(b), **Tampering with Records**, 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 Sixty-Five:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about the 18th day of July, 2016, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image 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 thousand dollars or more but less

than seven thousand five hundred dollars in violation of Ohio Revised Code §2913.05(A), 2913.05(B); 2913.05(C), **Telecommunications Fraud**, a felony of the fourth 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 Sixty-Six:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about the 10th day of December, 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 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 thousand dollars or more but less than seven thousand five hundred dollars in violation of Ohio Revised Code §2913.05(A), 2913.05(B); 2913.05(C), **Telecommunications Fraud**, a felony of the fourth 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 Sixty-Seven:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about the 13th day of January, 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, 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 thousand dollars or more but less than seven thousand five hundred dollars in violation of Ohio Revised Code §2913.05(A), 2913.05(B); 2913.05(C), **Telecommunications Fraud**, a felony of the fourth 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 Sixty-Eight:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about the 10th day of December, 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, 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 in violation of Ohio Revised Code §1315.55(A)(3), 1315.99(C), **Money Laundering**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about the 29th day of September, 2017, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity in violation of Ohio Revised Code §1315.55(A)(3), 1315.99(C), **Money Laundering**, a felony of the third degree.

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

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

Thomas E. Stalf, on or about the 11th day of October, 2017, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity in violation of Ohio Revised Code §1315.55(A)(3), 1315.99(C), **Money Laundering**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about the 23rd day of October, 2017, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity in violation of Ohio Revised Code §1315.55(A)(3), 1315.99(C), **Money Laundering**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about the 20th day of January, 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, 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 in violation of Ohio Revised Code §1315.55(A)(3), 1315.99(C), **Money Laundering**, a felony of the third degree.

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

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

Thomas E. Stalf, on or about the 5th day of March, 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, 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 in violation of Ohio Revised Code §1315.55(A)(3), 1315.99(C), **Money Laundering**, a felony of the third degree.

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

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

Peter A. Fingerhut and Thomas E. Stalf, on or about the 18th day of June, 2017, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity in violation of Ohio Revised Code §1315.55(A)(3), 1315.99(C), **Money Laundering**, a felony of the third degree.

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

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

Thomas E. Stalf, on or about the 18th day of February, 2017, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity in violation of Ohio Revised Code §1315.55(A)(3), 1315.99(C), **Money Laundering**, a felony of the third degree.

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

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

Thomas E. Stalf, on or about the 27th day of April, 2016, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity in violation of Ohio Revised Code §1315.55(A)(3), 1315.99(C), **Money Laundering**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about the 9th day of December, 2015, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management,

establishment, or carrying on of corrupt activity in violation of Ohio Revised Code §1315.55(A)(3), 1315.99(C), **Money Laundering**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about the 9th day of June, 2015, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity in violation of Ohio Revised Code §1315.55(A)(3), 1315.99(C), **Money Laundering**, a felony of the third degree.

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

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

Thomas E. Stalf, on or about the 6th day of April, 2015, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity in violation of Ohio Revised Code §1315.55(A)(3), 1315.99(C), **Money Laundering**, a felony of the third degree.

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

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

Thomas E. Stalf and Peter A. Fingerhut, 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 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 and at least one of the incidents of corrupt activity was a felony of the first, second, or third degree, in violation of Ohio Revised Code §2923.32, **Engaging in a Pattern of Corrupt Activity**, a felony of the first degree.

## INTRODUCTION

During the period January 1, 2011 through August 1, 2021, the individuals listed below engaged in criminal activity by acting individually and collectively in a largescale covert scheme to defraud the Columbus Zoo of over \$2,290,000.00. The Columbus Zoo is the jewel of Delaware County. Upper management of the Columbus Zoo including but not limited to its CEO, CFO, and Director of Marketing hijacked the purse strings of the Columbus Zoo, colluding to conceal the nature of their spending or thievery which amounts to more than \$2,290,000.00 of Columbus Zoo money on the following:

- a. Concert tickets
- b. Tickets to sporting events in the Columbus area and elsewhere
- c. Golf club memberships at Kinsale and Wedgewood
- d. Trips to Germany, Hawaii, Great Wolf Lodge
- e. Clothing, sports equipment
- f. Meals, beverages, and alcohol
- g. Electronics
- h. Furniture
- i. Services
- j. Miscellaneous non-Zoo related items, e.g., iTunes, SiriusXM
- k. Motor vehicles
- l. Suites, loges and special seats at Nationwide Arena and the Schottenstein Center
- m. Entertainment tickets

all for personal or family use.

To accomplish the theft, three key members of management, Defendants Stalf, Fingerhut, and Greg Bell, conspired to develop and execute a way to mask the personal spending so that they could live off Columbus Zoo money. When it came time to pay for the tickets, suites, loges or food, beverages and alcohol related to those events, it was agreed upon that coding would be used such as: tickets for board members and donors, meals for board members or donors, food and drinks for donors, food and drinks for board members, and one that Fingerhut liked the most, “promotional support.” By using these codes, reasons, or excuses for the charge on a Zoo-owned credit card or a Zoo Check Request form as a reason that the Zoo should cut a check to pay a bill, these officials were able to get past the accounting system and checks and balance system which the Zoo had in place so that they could steal in excess of \$2,290,000.00.

The Zoo has/had a policy in Section 6.3 of its employee handbook which provided:

“Purchasing Personal  
Items: Personal items cannot be charged to the Zoo. This is true regardless of whether or not the charges incurred are subsequently reimbursed back to the Zoo by employees.”

This policy was grossly violated.

To further accomplish their scheme to defraud the Zoo, Greg Bell, Stalf, John Doe 1, and Fingerhut stole from the Zoo's barter system. The Zoo had a barter account. The account was managed by barter management companies IMS and ITEX, each of which operate similarly. The Zoo "sells" or lists for exchange tickets to the Zoo, Zoombezi Bay, and the Safari Golf Course on the barter account and, in return, receives credit to spend at other vendors within the barter network. This arrangement has been in place for several decades. If a vendor such as an office supply company wanted to trade office supplies for Zoo tickets, such would occur. The Zoo's credit balance increased significantly over the years since there were fewer reciprocal options for the Zoo to spend its credit. Stalf, Fingerhut, Bell and others stole Zoo assets or money from the Barter account to go to sporting events or on trips, i.e. Game 6 of the 2016 World Series, high end bicycles, party buses or a family vacation in Florida.

To further the scheme to defraud, Fingerhut threatened a Zoo vendor, Business 1, with harm to it unless it paid him \$10,000.00 in 2019 and \$10,000 in 2020. For nearly a decade Fingerhut victimized Business 1 by exploiting Business 1's relationship with the Zoo for his personal benefit to pay for gift cards, vacations, expensive cigars and other items. Further, Fingerhut and Greg Bell, with the knowledge of Stalf, instructed Business 1 to falsify billing invoices to the Zoo so that the Zoo would pay for personal expenses of Fingerhut, Greg Bell, and Stalf including but not limited to a birthday party, entertainment, trips, tickets to sporting events and other expenses.

To further accomplish their scheme to defraud, upper management treated Zoo cash, Zoo alcohol, Zoo beer, and Zoo assets as if he or they owned it.

Once the Board of Directors of the Zoo ordered those in charge of operating the Zoo to cease purchasing tickets, seats, suites, and loges, Fingerhut had vendors receive a bill from Nationwide Arena, PromoWest or the Dublin Irish Festival and pay the bill themselves, then bill the zoo for the amount of the invoice from Nationwide Arena. PromoWest or the Dublin Irish Festival thereby hiding the true reason for the expenditure.

To further the scheme to defraud and/or to further his stature with the Zoo and in the community, Stalf demanded favors, services or other benefits from Business 4, a zoo vendor.

### **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 Tom Stalf (former CEO of the Zoo), Greg Bell (Former CFO of the Zoo), Peter Fingerhut, John Doe 1, Jane Doe 1, Jane Doe 2, John Doe 5, John Doe 6, Business 5, Grant Bell, 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**

1. **Thomas “Tom” E. Stalf** was the CEO of the Zoo until he resigned in the Spring of 2021. Stalf had free rein to operate and control Zoo operations thus hiding his conduct and the conduct of others from the Board of Directors.
2. **Gregory “Greg” D. Bell** was the CFO of the Zoo until he also resigned in the Spring of 2021.
3. **Peter “Pete” A. Fingerhut** was the Director of Marketing of the Zoo until he was let go in early 2021.
4. **John Doe 5** was a Zoo employee who arranged for Tom Stalf to meet John Doe 4 of Business 4.
5. **John Doe 4** owns Business 4. Business 4 and John Doe 4 provided Stalf with benefits in return for work at the Zoo.
6. **John Doe** was a person who worked for the Zoo.
7. **Grant Bell** worked in purchasing for the Zoo and is the son of Greg Bell.
8. **Business 1** is a company or Zoo vendor extorted by Fingerhut to pay him two (2) \$10,000.00 cash payments in addition to providing Fingerhut with other “favors.”
9. **Business 2** is a company owned by a Zoo employee.
10. **Business 5** was a vendor to the Zoo.
11. **Business 6** was a vendor to the Zoo.
12. **John Doe 6** owned and operated Business 5 and Business 6
13. **John Doe 2** is a Franklin County, Ohio Businessman.
14. **John Doe 3** is a Franklin County, Ohio Businessman.
15. **Jane Doe 1** owned a company which was a Zoo vendor.
16. **Jane Doe 2** is a relative of an executive at the Zoo.

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

The plan of the Enterprise and its function was to steal money from the Zoo and/or to “shake down” vendor(s) or threaten directly or indirectly such vendor(s) so that the executives who ran the day to day operations of the Zoo could enrich themselves and to hide what they were doing using an elaborate scheme of deception and to continue to steal money and services. Enrichment occurred in many ways including but not limited to: sporting events, food and drink at sporting events, vacations, directly pocketing cash, and motor vehicles. Many benefited from this thievery, some unwittingly, including spouses, relatives and adult children of these men.

The primary tool used to enrich themselves was the Credit Card Authorization or Usage form or the Check Authorization form used by the Zoo to pay its bills. Defendant Fingerhut had his

expense reports approved by CFO Bell. CFO Bell had his expense reports approved by Defendant Stalf and Defendant Stalf had his expense reports approved by CFO Bell. The three conspired to create a system of abuse whereby the three men, minimally accompanied by John Doe 1, were successful in exercising control by deception of more than \$2,290,000.00 in Zoo funds. CFO Bell signed most if not all of the authorization forms knowing that the forms were fraudulent. In some instances, not only was the reason for the expense false, the expense itself was false. When Zoo staff questioned questionable expenses, their questions were ignored. When Greg Bell attempted to follow the law and provide Stalf and Fingerhut with an income document, Bell's job was threatened by Stalf. The Board of Directors was not aware of and did not endorse the conduct of Stalf, Bell, Fingerhut, or anyone else who may have broken the law in this Enterprise.

In addition to the Credit Card Authorization or usage form and the Check Authorization form, members of this Enterprise stole the following, often times with the knowledge of one another: alcohol, beer, items offered for exchange on the Barter network such as high-end bicycles, Game 6 World Series tickets, cash, services such as satellite radio, patio furniture, clothing, golf clubs, a safe, an RV, vacations, barter items, party bus rides for birthdays and weddings and other items.

In addition, Zoo funds were deceptively used for family vacations, trips to Germany, Florida and Hawaii, traveling to Oklahoma for an Ohio State vs. Oklahoma football game, and several questionable trips to Florida, Tennessee, Washington D.C., New York, and other places.

Within the scope of the Enterprise and to further its affairs, Fingerhut, Stalf, Greg Bell, and John Doe 1 were aware of the contents of the Zoo employee policy handbook which in part in Section 6.3 provided that:

“Purchasing Personal Items: Personal items cannot be charged to the Zoo. This is true regardless of whether or not the charges incurred are subsequently reimbursed back to the Zoo by employees.”

Within the scope of this Enterprise and to further its affairs, Fingerhut, Stalf, Greg Bell, Grant Bell and John Doe 1 possessed or had access to credit cards which were in the name of the Zoo and for which expenses related to the Zoo could be purchased.

Within the scope of this Enterprise and to further its affairs, Fingerhut used his Zoo-issued credit card to make thousands of dollars of purchases of goods, items, or personal property at Kinsale Country Club and Scioto Reserve.

Within the scope of this Enterprise and to further its affairs, members of the Fingerhut family also charged personal items to the Zoo-issued credit card possessed by Peter Fingerhut at either of these two golf courses, such as boxing classes, clothing, and alcohol.

Within the scope of this Enterprise and to further its affairs, when complaints about Fingerhut and his family spending Zoo money at these country clubs were made to Stalf, Stalf ignored them.

Within the scope of this Enterprise and to further its affairs, Tom Stalf and/or his family used his Zoo-issued credit card to make thousands of dollars of purchases of goods, items, or personal property at Kinsale Country Club and Scioto Reserve and use the credit at such clubs to supply food and beverages to friends of their children.

Within the scope of this enterprise and to further its affairs, Greg Bell and/or his family used his Zoo-issued credit card to make thousands of dollars of purchases of goods, items, or personal property at Kinsale Country Club and Scioto Reserve.

Within the scope of this enterprise and to further its affairs, Fingerhut falsified credit card authorization forms or check authorization forms by placing false reasons for the expense on such form thereby masking or concealing the true expense so that that the Zoo would pay for Fingerhut to carouse, travel, eat, socialize, and further conduct his personal life.

Within the scope of this Enterprise and to further its affairs, Stalf falsified credit card authorization forms or check authorization forms by placing false reasons for the expense on such form thereby masking or concealing the true expense so that that the Zoo would pay for Stalf and his family's personal entertainment, socialize, and further conduct his personal life.

Within the scope of this Enterprise and to further its affairs, Greg Bell falsified credit card authorization forms or check authorization forms by placing false reasons for the expense on such form thereby masking or concealing the true expense so that that the Zoo would pay for Bell and his family's personal entertainment, socialize, and further conduct his personal life.

Within the scope of this Enterprise and to further its affairs, Fingerhut negotiated the leasing of a suite and a loge at Nationwide Arena knowing it would be for personal use for himself, Stalf, Greg Bell, John Doe 1, and their families.

Within the scope of this Enterprise and to further its affairs, Fingerhut negotiated the leasing of a suite at the Schottenstein Center knowing it would be for personal use for himself, Stalf, Greg Bell, John Doe 1, and their families.

Within the scope of this Enterprise and to further its affairs, Fingerhut, Stalf and Bell at one point in time signed the leases in question. Fingerhut specifically requested that the Zoo name not be placed on the suite or loge as is customary thereby concealing the fact that the Zoo, a non-profit 501(c)(3), leased a suite.

Within the scope of this Enterprise and to further its affairs, Fingerhut used a falsified Credit Card Usage form or Check Authorization or Usage form to purchase tickets at Nationwide Arena, at the Schottenstein Center, at other venues in the Columbus area, to travel to Norman, Oklahoma for an Ohio State/Oklahoma football game, and to purchase alcohol, food, and beverages at Nationwide Arena, the Schottenstein Center, Huntington Park, and other entertainment venues in the Columbus area, as well as restaurants, bars and similar establishments in Ohio.

Within the scope of this Enterprise and to further its affairs, Fingerhut, Greg Bell, and Stalf converted and spent more than \$1,800,000.00 of Zoo money at Nationwide Arena, the Schottenstein Center, Huntington Park, and other similar venues over a period of time on personal expenses at hockey games, concerts, baseball games, basketball games, or other events at these venues.

Within the scope of this Enterprise and to further its affairs, John Doe 1 and Stalf used Business 5 as a strawman to sell personal vehicles to the Zoo at a profit, concealing the fact that it was the Zoo buying their personal car(s).

Within the scope of this Enterprise and to further its affairs, John Doe 1 purchased vehicles for the Zoo using Business 5's name. Business 5 then sold such vehicles to the Zoo at a price determined by John Doe 1 and Greg Bell and at a profit for Business 5. Business 5/John Doe 5 on several occasions kicked money back from the sale of these vehicles to John Doe 1 or a member of his family.

Within the scope of this Enterprise and to further its affairs, Stalf stole bottles of alcohol and beer from the Zoo warehouse for parties at his personal residence several times a year over a 5 to 6-year period of time.

Within the scope of this Enterprise and to further its affairs, Stalf, Greg Bell, and John Doe 1 used the Zoo barter system to enrich themselves by having the Zoo pay for items on the barter system for their own personal use such as World Series Tickets for Stalf, high-end bicycles for Stalf, limo rides for Stalf, limo rides for John Doe 1 or members of his family, personal items for Greg Bell and/or his family, and condos for a Florida vacation for Stalf and his family.

Within the scope of this enterprise and to further its affairs, John Doe 1 and a member of his family started a family business run by John Doe 1 and a family member and, concealing the identity of ownership of this business, provided a service to the Zoo which was unnecessary. In addition, John Doe 1 overbilled the Zoo for the services he performed and used the Zoo credit card he possessed or had access to, to buy the goods and materials for this company to operate. Greg Bell was aware of this operation and permitted it to happen.

Within the scope of this enterprise and to further its affairs, Stalf purchased an RV with Zoo moneys, having Greg Bell wire the funds to the seller under the pretense that the RV would be housed at the Wilds in Muskingum county and used at the Wilds when in fact Stalf converted the RV to his personal RV. Stalf used the RV to travel to Put-In-Bay for a weekend and other places.

Within the scope of this enterprise and to further its affairs, Greg Bell and Stalf rented Zoo-owned real estate to family members at far less than the fair market value of the rental value of said property, and furthermore, the Zoo paid to remodel the property Stalf had his relatives live in and paid for the patio furniture for said property through the Barter system.

Within the scope of this enterprise and to further its affairs, the Zoo paid for satellite radio for the personal vehicles of members of this Enterprise including family members and/or their spouses.

Within the scope of this enterprise and to further its affairs, John Doe 4 paid Tom Stalf benefits including trips to sporting events on an airplane John Doe 4 leased and constructing a barn addition at a loss to Business 4.

Within the scope of this enterprise and to further its affairs, after John Doe 4 provided Stalf with benefits and agreed to and did provide more benefits to Stalf, Stalf awarded John Doe 4/ Business 4 with a \$2,300,000.00 no bid contract.

Within the scope of this Enterprise and to further its affairs, after the construction of several cabins at the Wilds, Stalf ordered Greg Bell to pay John Doe 4 the sum of \$125,000.00 to pay for a change order with no supporting data, four months after the final payment was made on the contract for the full approved amount of the project and during a time when Business 4 was in financial trouble.

Within the scope of this enterprise and to further its affairs, Stalf ordered Greg Bell to pay the suspicious change order mentioned above almost immediately after Zoo/Wilds staff began to question the alleged change order in violation of Zoo payment protocol.

Within the scope of this Enterprise and to further its affairs, Fingerhut solicited in December of 2018 and in December of 2019, and received each time, \$10,000.00 in cash from Business 1.

Within the scope of this Enterprise and to further its affairs, Fingerhut advised Business 1 that unless it provided him with \$10,000.00 in December of 2018 that the contract that Business 1 had with the Zoo would be put up for bid and a competitor of Business 1 could get the contract.

Within the scope of this Enterprise and to further its affairs, Fingerhut then bought representatives lunch or dinner when he was extorting \$10,000.00 from them and billed the expense of the lunch or dinner to the Zoo under false pretenses. He did such on consecutive years and also placed on his outlook calendar that he was meeting that these people.

Within the scope of this Enterprise and to further its affairs, Greg Bell and Fingerhut coerced Business 1 into paying for Fingerhut's wife's birthday party. Further, Fingerhut coerced Business 1 into paying for a hundreds of dollars of gift cards for Fingerhut as well as a Hawaii vacation for Fingerhut and his family, a trip to Germany, and Fingerhut's table at the Dublin Irish Festival.

Within the scope of this Enterprise and to further its affairs, Peter Fingerhut cut and pasted vendor invoices, changing the true purpose of an invoice into a false purpose such as "Promotional Spending" so that Fingerhut could trick the Zoo into paying for his personal expenses.

Within the scope of this Enterprise and to further its affairs, Peter Fingerhut and Tom Stalf generated income for themselves which is reportable as 1099 income. When the Form 1099 was prepared and in the process of being provided to them by Greg Bell, Stalf threatened to fire Bell if Bell handed them or him the 1099. Further, the 1099 was destroyed or not provided.

Within the scope of this Enterprise and to further its affairs, Stalf and Fingerhut committed Tampering with Records by lying on their Federal and/or State Income tax returns by not reporting income earned.

Within the scope of this Enterprise and to further its affairs, after developing a scheme to defraud the Zoo Stalf, Greg Bell, and/or Fingerhut used a telecommunication device or telecommunications devices to email data or records in furtherance of their scheme to defraud.

Within the scope of this Enterprise and to further its affairs, after developing a scheme to defraud the Zoo, Fingerhut induced Zoo Vendors to use a telecommunication device or telecommunications devices to email data or records in furtherance of his scheme to defraud the Zoo.

Within the scope of this Enterprise and to further its affairs, Peter Fingerhut lied to State Agents when he was interviewed by State Agents in May 2023.

Within the scope of this Enterprise and to further its affairs, Greg Bell, Fingerhut and Stalf conducted or attempted 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, to wit: theft, when they conducted a credit card or check transaction concerning their true expenditures at Nationwide Arena, the Schottenstein Center or other similar places.

Within the scope of this Enterprise and to further its affairs, Greg Bell pocketed cash from the sale of Zoo property.

Within the scope of this Enterprise and to further its affairs, Stalf used the Barter system to:

1. Secure Les Misérables Tickets for his wife
2. Secure Game 6 or other World Series tickets for himself in 2016
3. Secure Hamilton tickets
4. Secure limo service
5. Agree with his wife on the securing of patio furniture
6. Vacation with the family in Florida
7. Secure van Transportation
8. Assist with moving his in-laws

Within the scope of this Enterprise and to further its affairs, John Doe 1 used the barter system to secure concert tickets for his adult children and for other personal desires.

### **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 August 1, 2021 the common purpose of the Enterprise regarding its ongoing illegal conduct was to steal money or covert money, property, or services owned by the Zoo, permanently depriving the Zoo of such property or services and to hide their conduct. Additionally, member(s) of the criminal

Enterprise made false statements to investigators, i.e. Peter Fingerhut, 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: Fingerhut negotiated contracts for the leasing of suites and loges purportedly on behalf of the Zoo but in reality, on behalf of himself, Greg Bell and Stalf. Greg Bell, Stalf, and Fingerhut signed off on the contracts at one point in time or another. Then each began their scheme to defraud the Zoo of money. Greg Bell as the CFO approved all payments and expenditures. Stalf as the CEO was aware that himself, Greg Bell, Fingerhut, and John Doe 1 were converting Zoo property to their own use, and he permitted it. Stalf found property he liked on the Barter network or elsewhere he then ordered Greg Bell to pay for it out of Zoo money despite the fact the property was for his personal or his family's personal use. Stalf and Fingerhut solicited and receive benefits from Zoo Vendors to corrupt themselves.

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.

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 with events taking place in Delaware, Franklin, Richland, and Cuyahoga Counties, as well as in other states such as Wisconsin, New York, Georgia, Louisiana, Michigan, and the District of Columbia, including but not limited to:

**E. THE PATTERN OF CORRUPT ACTIVITY FROM January 2011 to May 2021.**

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. **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.
2. **TELECOMMUNICATIONS FRAUD: 2913.05** No person, 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.
3. **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.

4. BRIBERY: 2921.02 (B) No person, before or after the person was employed as a public, servant knowingly solicit or accept for self or another person any valuable thing or valuable benefit to corrupt or improperly influence the person or another public servant with respect to the discharge of the person's or the other public servant's duty.

5. EXTORTION: 2905.11 (A)(5) No person shall with purpose to obtain any valuable thing or valuable benefit or to induce another to do an unlawful act, expose or threaten to damage any person's personal or business repute.

6. MONEY LAUNDERING: 1315.55 (C) No person shall 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.

7. CONSPIRACY: 2923.02 (A) No person, with purpose to commit or to promote or facilitate the commission of engaging in a pattern of corrupt activity, shall do either of the following: (1) With another person or persons, plan or aid in planning the commission of any of the specified offenses; (2) Agree with another person or persons that one or more of them will engage in conduct that facilitates the commission of any of the specified offenses with some overt acts being falsifying Zoo billing or payment records, cutting and pasting documents, having vendors place false information on the vendor's invoice so that the Zoo would pay the vendor, accepting \$10,000.00 in cash on two occasion, and using a third party to sell the Zoo vehicles owned by the defendants.

8. BRIBERY: 2921.02(A) No person, with purpose to corrupt a public servant or party official, or improperly to influence a public servant or party official with respect to the discharge of the public servant's or party official's duty, whether before or after the public servant or party official is elected, appointed, qualified, employed, summoned, or sworn, shall promise, offer, or give any valuable thing or valuable benefit.

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

<b>Incident One</b>	<b>Aggravated Theft of One Million Five Hundred Thousand Dollars or More, §2913.02, F1</b>
<b>Defendants</b>	Tom Stalf, Pete Fingerhut
<b>Date of Offense</b>	On or about 2/23/2011 through 6/1/2021

The Defendants on or about 2/23/2011 through 8/18/2021, did with purpose to deprive the owner, The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association, of property or services, to wit: money/assets, 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 more than \$2,290,000.00 from the Columbus Zoo by a myriad of deceptive practices. Examples of such conduct may be found in the non-exclusive list found below:

### **THEFT BY STEALING FROM THE ZOO'S BARTER ACCOUNT**

The following conduct relates to specific instances of theft which have been aggregated as required by law into one incident of corrupt activity: theft. Theft occurred in a myriad of ways as stated herein. What follows are examples of theft by members of the criminal enterprise. In addition each incident may be an incident of tampering with records for falsifying a record associated with the particular expense and an incident of telecommunication fraud if email was used or other internet type service.

### **THE BARTER ACCOUNT**

The barter account which was set up for companies to trade its product for Zoo tickets was used by Greg Bell, Stalf, Fingerhut, and John Doe 1 for personal gain or use and not for legitimate Zoo related activities as seen below:

<b>Purchase Date</b>	<b>Event Name</b>	<b># of Tickets</b>	<b>Purchase Amount</b>	<b>Loss Amount</b>	<b>Loss Against</b>
5/10/2013	Les Misérables	4	\$ 1,100.00	\$ 1,166.00	Stalf
10/15/2014	Cavaliers	2	\$ 500.00	\$ 530.00	Greg Bell
11/21/2014	OSU Basketball	2	\$ 120.00	\$ 127.20	John Doe 1
3/2/2016	Arnold MMA Festival	4	\$ 240.00	\$ 254.40	Stalf
4/5/2016	Crew	72	\$ 4,320.00	\$ 4,579.20	Greg Bell
8/11/2016	Drake	4	\$ 430.00	\$ 455.80	Greg Bell
8/25/2016	Kanye West	4	\$ 320.00	\$ 339.20	Greg Bell
10/31/2016	World Series	2	\$ 2,800.00	\$ 2,968.00	Stalf
10/31/2016	World Series	3	\$ 6,600.00	\$ 6,996.00	Stalf
12/22/2016	Harlem Globetrotters	4	\$ 320.00	\$ 339.20	John Doe 1
1/20/2017	OSU vs. Maryland Basketball	6	\$ 390.00	\$ 413.40	John Doe 1
2/17/2017	CBJ vs. Penguins	4	\$ 500.00	\$ 530.00	Greg Bell
5/10/2017	Rock on the Range	4	\$ 4,000.00	\$2,120.00 \$2,120.00	Greg Bell John Doe 1
7/19/2017	Reds	8	\$ 800.00	\$ 848.00	John Doe 1
8/24/2017	Reds	4	\$ 280.00	\$ 296.80	Greg Bell
9/12/2017	OSU Football	4	\$ 700.00	\$ 745.50	Greg Bell
12/28/2017	Lana Del Ray	4	\$ 370.00	\$ 394.05	Greg Bell
7/11/2018	Sugarland	4	\$ 300.00	\$ 319.50	Greg Bell
8/13/2018	Jay-Z	4	\$ 800.00	\$ 852.00	Greg Bell

9/4/2018	CBJ - Catering	N/A	\$ 4,100.00	\$ 4,510.00	Greg Bell
9/4/2018	CBJ - Catering	N/A	\$ 1,000.00	\$ 1,100.00	Greg Bell
10/11/2018	CBJ	Suite	\$ 6,000.00	\$ 6,600.00	Greg Bell
1/24/2019	Hamilton	3	\$ 3,000.00	\$ 3,195.00	Stalf
7/16/2019	Reds	5	\$ 525.00	\$ 577.50	Greg Bell
10/2/2019	CBJ	2	\$ 550.00	\$ 585.75	Greg Bell
10/2/2019	CBJ	2	\$ 550.00	\$ 585.75	Greg Bell
10/2/2019	CBJ	Unknown	\$ 550.00	\$ 585.75	Greg Bell
10/2/2019	CBJ	2	\$ 550.00	\$ 585.75	Greg Bell
2/5/2020	CBJ	Unknown	\$ 2,200.00	\$ 2,343.00	Greg Bell
1/19/2018	Minuteman Tickets - Jeff Dunham		\$ 240.00	\$ 255.60	Greg Bell
10/15/2014	Additional 2 Cav's tic	2	\$ 500.00	\$ 530.00	John Doe 1

Date	Description	Item Purchased	Total Amount	Loss Against
1/17/2014	IMS Travel Clearing Account - Stalf - Naples 3-bedroom Va-3/29	Naples, FL condo	\$ 1,665.00	Stalf
3/19/2014	Bell Moving & Storage Inc - Local Moving Services	Bell Moving & Storage Inc.	\$ 487.60	Stalf
3/28/2014	IMS Travel Clearing Account - Stalf - Apollo Condominium -3/29	Apollo condo	\$ 1,110.00	Stalf
4/27/2015	IMS - Scrip In Transit - Ohio (70105)	Bent Tree/Glenross/Golf Club of Dublin	\$ 466.40	Greg Bell
4/30/2015	Omaha Man Caves Auth 776788: Order		\$ 2,310.00	Greg Bell
5/8/2015	IMS - Scrip In Transit - Ohio (70105)	Jet Express	\$ 742.00	Stalf
5/8/2015	IMS - Scrip In Transit - Ohio (70105)	Magic Mountain - Family Pack	\$318.00 \$318.00	Stalf Greg Bell
5/12/2015	Handy Bikes USA LLC (16293)	2 Hybrid bikes	\$ 1,049.40	Stalf
11/9/2015	NTG Enterprises - Operating Account 3 watches	3 watches	\$ 1,974.50	Stalf
11/24/2015	NTG Enterprises - Operating Account Watch	1 watch	\$ 654.50	Stalf
3/22/2016	ITEX of Columbus 8 cedar point tickets		\$ 572.00	Greg Bell

11/7/2016	R MAN VAN Limo & Luxury Car Services Minibus incl. tax for Pete Fingerhut, 11/5	Limo service	\$ 532.13	Fingerhut
7/21/2017	Magic Mountain #16: 20-magic mt passes for Pete Fi		\$ 264.00	Fingerhut
3/8/2018	R Man Van Limo & Luxury Car Service - Down payment for shuttle service for 4/28		\$ 171.73	Stalf
4/30/2018	R Man Van Limo & Luxury Car Service - 4/28 for 6 & 3/4 hours service	Limo service on 4/28/2018	\$ 1,004.63	Stalf
9/24/2018	R Man Van Limo & Luxury Car Service - October 13th 4 Hours Wedding Shuttle Service	October 13th 4 hours wedding shuttle service	\$ 503.74	Murnane
5/28/2019	Scrip Order (Bent Tree/Glenross/Golf Club of Dublin/New Albany Links/Royal American/Clov)		\$ 766.80	Greg Bell
6/7/2019	Scrip Order (Bent Tree/Glenross/Golf Club of Dublin/New Albany Links/Royal American/Clov)		\$ 1,022.40	Greg Bell
7/26/2019	Scrip Order Jet Express	Jet Express	\$ 274.77	Greg Bell
7/29/2019	Shark Industries Ltd. - scooters	Scooters	\$ 4,044.87	Stalf
8/15/2019	OAKHAVEN GOLF CLUB: 6 Certs 2 Person/Cart# 1255-1		\$ 475.20	Greg Bell
2/27/2020	OAKHAVEN GOLF CLUB: 6 Certs: 1267-1272	6 Certs: 1267-1272	\$ 475.20	Greg Bell
5/21/2020	Scrip Order (Bent Tree/Glenross/Golf Club of Dublin/New Albany Links/Royal American/Clov)		\$ 1,022.40	Greg Bell
5/21/2020	Scrip Order (Bent Tree/Glenross/Golf Club of Dublin/New Albany Links/Royal American/Clov)		\$ 1,022.40	Greg Bell
5/21/2020	Scrip Order National Road Golf Course - Twosome		\$ 370.62	Greg Bell
5/21/2020	Scrip Order National Road Golf Course - Foursome		\$ 357.84	Greg Bell
5/21/2020	Scrip Order The Virtues Golf Club		\$ 426.00	Greg Bell
7/2/2020	Scrip Order National Road Golf Course - Foursome		\$ 357.84	Greg Bell

7/2/2020	Scrip Order Thorn Apple Country Club 4 Some		\$ 905.25	Greg Bell
4/27/2015	IMS - Scrip in Trail	Little Turtle Golf Club	\$ 424.00	Greg Bell
4/30/2015	Footprints to Wellness	10 reflexology gift certificates	\$ 795.00	Stalf
10/11/2016	The Bullet Ranch - safe	Safe	\$ 530.00	Greg Bell
3/20/2019	IMS - Scip In Transit - Ohio	La Scala	\$ 426.00	Greg Bell
3/28/2019	Liberty Tavern	Liberty Tavern	\$ 53.25	Greg Bell
6/7/2019	Liberty Tavern	Liberty Tavern	\$ 53.25	Greg Bell
6/7/2019	IMS - Scrip in Transit - Ohio	La Scala	\$ 106.50	Greg Bell
1/29/2020	La Scala Ristorante Inc	Gift Certs #1489-1492	\$ 220.00	Greg Bell
2/27/2020	Vittoria Ristorante	Certs1157-1160	\$ 220.00	Greg Bell
2/27/2020	La Scala Ristorante Inc	Certs 1535-1538	\$ 220.00	Greg Bell

TICKETS, FOOD, BEVERAGES AND ALCOHOL FOR EVENTS AT NATIONWIDE ARENA (SUITE, LOGE, GLASS HOCKEY SEATS OR OTHER SEATS) IN THE AMOUNT OF \$1,051,523.89

Check # / Card	Date	Description	Amount
188956	2/26/2011	COLUMBUS BLUE JACKETS	\$ 15,000.00
194627	10/21/2011	COLUMBUS BLUE JACKETS	\$ 15,000.00
198531	4/20/2012	COLUMBUS BLUE JACKETS	\$ 5,720.00
202414	9/7/2012	OHIO AAA BLUE JACKETS	\$ 500.00
202670	9/21/2012	COLUMBUS BLUE JACKETS	\$ 8,334.00
Chase - 6357	11/25/2012	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 815.39
204650	12/14/2012	COLUMBUS BLUE JACKETS	\$ 5,000.00
Chase - 6357	2/10/2013	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 908.29
AMEX	3/11/2013	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,000.01
AMEX	3/13/2013	DNCSS NATIONWIDEINSE COLUMBUS OH	\$ 124.24
AMEX	3/17/2013	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 893.35
AMEX	4/13/2013	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 870.07
Chase - 6357	4/27/2013	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 959.95
AMEX	5/9/2013	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 847.71
209520	6/14/2013	COLUMBUS BLUE JACKETS	\$ 1,700.00

AMEX	6/19/2013	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 546.53
AMEX	7/13/2013	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 712.14
AMEX	7/13/2013	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 31.49
210847	8/2/2013	COLUMBUS BLUE JACKETS	\$ 10,000.00
AMEX	9/21/2013	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,348.13
AMEX	10/12/2013	COLUMBUS BLUE JACKET COLUMBUS OH	\$ 2,035.00
AMEX	10/15/2013	COLUMBUS BLUE JACKET COLUMBUS OH	\$ 1,450.00
AMEX	10/28/2013	COLUMBUS BLUE JACKET COLUMBUS OH	\$ 600.00
Chase - 6357	11/9/2013	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 953.01
Chase - 6357	11/16/2013	DNCSS NATIONWIDE CLUB COLUMBUS OH	\$ 23.00
Chase - 6357	11/16/2013	DNCSS NATIONWIDE CLUB COLUMBUS OH	\$ 23.00
Chase - 6357	11/16/2013	DNCSS NATIONWIDE CLUB COLUMBUS OH	\$ 41.50
Chase - 6357	11/16/2013	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,307.39
AMEX	11/24/2013	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 812.26
AMEX	11/30/2013	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,285.78
213814	12/6/2013	COLUMBUS BLUE JACKETS	\$ 13,300.00
213955	12/13/2013	COLUMBUS BLUE JACKETS	\$ 15,000.00
AMEX	12/14/2013	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,244.12
AMEX	12/17/2013	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 2,088.65
AMEX	1/27/2014	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,042.42
215157	2/11/2014	COLUMBUS BLUE JACKETS	\$ 1,995.00
Chase - 6357	2/15/2014	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 2,315.08
215680	3/5/2014	COLUMBUS BLUE JACKETS	\$ 3,200.00
Chase - 6357	3/5/2014	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,407.85
Chase - 6357	3/13/2014	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,216.61
AMEX	3/22/2014	DNCSS NATIONWIDESUIT COLUMBUS	\$ 987.46

		OH	
315397	4/4/2014	COLUMBUS BLUE JACKETS	\$ 1,600.00
Chase - 6357	4/4/2014	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 169.61
Chase - 6357	4/6/2014	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,249.58
Chase - 6357	4/15/2014	BLUEJACKETS 614-246-3350 OH	\$ 1,840.00
AMEX	4/16/2014	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,044.81
Chase - 6357	4/26/2014	BLUEJACKETS 614-246-3350 OH	\$ 1,840.00
Chase - 6357	4/30/2014	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,334.95
317928	7/8/2014	COLUMBUS BLUE JACKETS	\$ 15,000.00
Chase - 6357	8/13/2014	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 984.96
320138	10/3/2014	COLUMBUS BLUE JACKETS	\$ 45,000.00
AMEX	10/12/2014	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 748.39
AMEX	10/21/2014	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 789.59
Chase - 6357	11/8/2014	BLUEJACKETS 614-246-3350 OH	\$ 20.00
Chase - 6357	11/8/2014	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,578.22
Chase - 6357	12/9/2014	BLUEJACKETS 614-246_3350 OH	\$ 1,000.00
Chase - 6357	12/9/2014	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,147.59
Chase - 6357	12/18/2014	DNCSS NATIONWIDE CLUB COLUMBUS OH	\$ 36.00
Chase - 6357	1/10/2015	DNCSS NATIONWIDESURES COLUMBUS OH	\$ 1,227.93
Chase - 6357	1/17/2015	DNCSS NATIONWIDESURES COLUMBUS OH	\$ 1,550.70
Chase - 6357	1/17/2015	BLUEJACKETS 614-246-3350 OH	\$ 1,690.00
AMEX	1/30/2015	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,063.25
Chase - 6357	2/13/2015	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,212.36
AMEX	2/27/2015	COLUMBUS BLUE JACKET COLUMBUS OH	\$ 8,755.00
Chase - 6357	3/1/2015	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,462.44
Chase - 6357	3/7/2015	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,325.47
Chase - 6357	3/11/2015	DNCSS NATIONWIDESUITES COLUMBU OH	\$ 1,313.18

AMEX	3/12/2015	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,720.63
Chase - 6357	3/13/2015	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,601.31
Chase - 6357	3/18/2015	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 2,242.71
Chase - 6357	3/20/2015	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 3,248.06
AMEX	3/21/2015	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,260.46
AMEX	3/23/2015	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,742.25
AMEX	3/27/2015	COLUMBUS BLUE JACKET COLUMBUS OH	\$ 10,000.00
325644	6/12/2015	COLUMBUS BLUE JACKETS	\$ 4,939.50
AMEX	9/18/2015	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,191.43
Chase - 6357	9/18/2015	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 953.75
328558	9/24/2015	COLUMBUS BLUE JACKETS	\$ 19,396.00
Chase - 6357	9/25/2015	BLUEJACKETS 614-246-3350 OH	\$ 512.00
Chase - 6357	9/30/2015	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 159.00
Chase - 6357	9/30/2015	DNCSS NATIONWIDE CLUB COLUMBUS OH	\$ 51.50
AMEX	10/20/2015	DNCSS NATIONWIDE CON COLUMBUS OH	\$ 779.26
329613	11/6/2015	COLUMBUS BLUE JACKETS	\$ 28,333.33
Chase - 6357	11/14/2015	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 147.04
Chase - 6357	12/4/2015	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,484.75
AMEX	12/5/2015	DNCSS NATIONWIDEINSE COLUMBUS OH	\$ 96.86
Chase - 6357	12/5/2015	BLUEJACKETS 614-246_3350 OH	\$ 920.00
AMEX	12/20/2015	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,069.09
331015	12/26/2015	COLUMBUS BLUE JACKETS	\$ 31,433.34
Chase - 6357	1/2/2016	DNCSS NATIONWIDEINSEAT COLUMBUSOH	\$ 219.90
Chase - 6357	1/5/2016	BLUEJACKETS 614-246-3350 OH	\$ 880.00
Chase - 6357	1/7/2016	BLUEJACKETS 614-246-3350 OH	\$ 3,619.00
AMEX	1/10/2016	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,267.51
Huntington	1/14/2016	BLUEJACKETS 614-246-3350 OH	\$ 469.00



Chase - 6357	1/16/2016	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,401.55
Huntington	2/19/2016	BLUEJACKETS 614-246-3350 OH	\$ 880.00
Huntington	2/26/2016	BLUEJACKETS 614-246-3350 OH	\$ 880.00
Huntington	3/2/2016	BLUEJACKETS 614-246-3350 OH	\$ 420.00
Huntington	3/9/2016	BLUEJACKETS 614-246-3350 OH	\$ 880.00
Huntington	3/12/2016	BLUEJACKETS 614-246-3350 OH	\$ 882.00
Chase - 6357	3/22/2016	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,310.29
Huntington	3/25/2016	BLUEJACKETS 614-246-3350 OH	\$ 360.00
Huntington	4/5/2016	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 52.00
Huntington	4/5/2016	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 6.50
Huntington	4/5/2016	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 71.08
Chase - 6357	4/5/2016	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,519.39
333379	4/29/2016	COLHOC LIMITED PARTNERSHIP	\$ 23,589.33
334042	5/24/2016	COLHOC LIMITED PARTNERSHIP	\$ 38,610.00
Chase - 6357	6/21/2016	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,754.35
Huntington	7/7/2016	BLUEJACKETS 614-246-3350 OH	\$ 619.00
AMEX	7/9/2016	DNCSS NATIONWIDE CLU COLUMBUS OH	\$ 78.75
AMEX	7/9/2016	DNCSS NATIONWIDE CLU COLUMBUS OH	\$ 19.00
Huntington	7/14/2016	BLUEJACKETS 614-246-3350 OH	\$ 3,605.00
Chase - 6357	7/28/2016	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 153.41
Huntington	8/11/2016	BLUEJACKETS 614-246-3350 OH	\$ 812.00
AMEX	8/14/2016	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,599.10
AMEX	9/5/2016	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 2,610.51
AMEX	9/5/2016	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,673.10
Huntington	12/22/2016	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,061.56
Chase - 6357	12/26/2016	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 166.43
Chase - 2179	1/7/2017	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 234.59
Chase - 2179	1/7/2017	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 23.50

Chase - 2179	1/7/2017	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 51.50
AMEX	1/20/2017	DNCSS NATIONWIDEINSE COLUMBUS OH	\$ 32.96
Huntington	3/7/2017	BLUEJACKETS 614-246-3350 OH	\$ 4,410.00
Chase - 6357	3/9/2017	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,090.99
Chase - 6357	3/17/2017	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 94.25
AMEX	3/18/2017	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,143.32
Chase - 6357	3/18/2017	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,619.61
AMEX	3/19/2017	DNCSS NATIONWIDE CLU COLUMBUS OH	\$ 22.00
Huntington	4/4/2017	BLUEJACKETS 614-246-3350 OH	\$ 20.00
Huntington	4/4/2017	BLUEJACKETS 614-246-3350 OH	\$ 4,570.00
Chase - 6357	4/11/2017	DNCSS NATIONWIDE RETAI COLUMBUS OH	\$ 439.51
Chase - 2179	4/16/2017	DNCSS NATIONWIDE CLUB COLUMBUS OH	\$ 50.75
AMEX	4/17/2017	DNCSS NATIONWIDE RET COLUMBUS OH	\$ 123.36
AMEX	4/17/2017	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,531.03
Huntington	4/18/2017	BLUEJACKETS 614-246-3350 OH	\$ 70.00
AMEX	4/27/2017	COLUMBUS BLUE JACKET COLUMBUS OH	\$ 30,208.82
AMEX	4/27/2017	COLUMBUS BLUE JACKET COLUMBUS OH	\$ 21,765.68
AMEX	4/27/2017	COLUMBUS BLUE JACKET COLUMBUS OH	\$ 15,929.88
AMEX	4/27/2017	COLUMBUS BLUE JACKET COLUMBUS OH	\$ 11,023.30
343218	6/13/2017	COLUMBUS BLUE JACKETS	\$ 5,000.00
343273	6/16/2017	COLUMBUS BLUE JACKETS	\$ 55,333.00
AMEX	6/25/2017	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,014.03
Chase - 6357	9/7/2017	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,657.10
AMEX	9/8/2017	DNCSS NATIONWIDEINSE COLUMBUS OH	\$ 106.41
AMEX	9/8/2017	DNCSS NATIONWIDE CLU COLUMBUS OH	\$ 27.00
345831	9/8/2017	COLUMBUS BLUE JACKETS	\$ 3,150.00

346443	9/30/2017	COLUMBUS BLUE JACKETS	\$ 9,970.00
AMEX	10/4/2017	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,405.03
Chase - 6357	10/4/2017	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,827.42
AMEX	10/17/2017	COLUMBUS BLUE JACKET COLUMBUS OH	\$ 10,000.00
AMEX	10/20/2017	COLUMBUS BLUE JACKET COLUMBUS OH	\$ 15,000.00
AMEX	10/28/2017	DNCSS NATIONWIDEINSE COLUMBUS OH	\$ 195.27
AMEX	10/31/2017	DNCSS NATIONWIDE RET COLUMBUS OH	\$ 94.60
Huntington	11/3/2017	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 2,204.93
Chase - 6357	11/28/2017	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 100.54
Chase - 6357	12/12/2017	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 58.44
Huntington	12/27/2017	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,379.03
Chase - 2063	12/31/2017	& DNCSS NATIONWIDE CON COLUMBUS OH	\$ 19.00
Huntington	12/31/2017	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,443.82
AMEX	1/13/2018	DNCSS NATIONWIDEINSE COLUMBUS OH	\$ 49.88
AMEX	1/19/2018	DNCSS NATIONWIDEINSE COLUMBUS OH	\$ 151.52
Chase - 2063	1/25/2018	DNCSS NATIONWIDE CON COLUMBUS OH	\$ 62.50
Chase - 2063	1/30/2018	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 70.00
AMEX	2/3/2018	DNCSS NATIONWIDESUIT COLUMBUS OH	\$ 1,182.44
Huntington	2/17/2018	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,396.28
Chase - 2063	2/17/2018	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 168.63
AMEX	2/28/2018	DNCSS NATIONWIDE RET COLUMBUS OH	\$ 188.13
AMEX	3/3/2018	TM - COLUMBUS BLUE J COLUMBUS OH	\$ 6,010.00
AMEX	3/7/2018	DNCSS NATIONWIDE RET COLUMBUS OH	\$ 169.85
Huntington	3/9/2018	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 461.74

Huntington	3/11/2018	DNCSS NATIONWIDE CLUB COLUMBUS OH	\$ 22.00
Chase - 2063	3/11/2018	DNCSS NATIONWIDE CLUB COLUMBUS OH	\$ 39.00
AMEX	3/12/2018	DNCSS NATIONWIDE RET COLUMBUS OH	\$ 85.00
AMEX	3/13/2018	DNCSS NATIONWIDEINSE COLUMBUS OH	\$ 94.62
Huntington	3/15/2018	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 2,040.81
Chase - 2063	3/15/2018	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 198.63
Huntington	3/17/2018	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,556.30
Huntington	3/17/2018	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,690.00
Huntington	3/22/2018	BLUEJACKETS 614-246-3350 OH	\$ 3,600.00
Huntington	3/22/2018	BLUEJACKETS 614-246-3350 OH	\$ 120.00
AMEX	3/23/2018	DNCSS NATIONWIDE RET COLUMBUS OH	\$ 43.00
AMEX	3/23/2018	DNCSS NATIONWIDE CON COLUMBUS OH	\$ 20.75
Huntington	3/29/2018	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,427.06
Huntington	3/30/2018	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,496.80
Huntington	3/30/2018	BLUEJACKETS 614-246-3350 OH	\$ 5,300.00
AMEX	3/31/2018	DNCSS NATIONWIDE CON COLUMBUS OH	\$ 115.00
Huntington	4/1/2018	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,031.15
AMEX	4/2/2018	DNCSS NATIONWIDE CON COLUMBUS OH	\$ 60.00
Chase - 2063	4/3/2018	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 334.59
AMEX	4/4/2018	DNCSS NATIONWIDE CON COLUMBUS OH	\$ 25.25
Huntington	4/8/2018	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,238.92
Chase - 2063	4/8/2018	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 180.68
350496	4/13/2018	COLHOC LIMITED PARTNERSHIP	\$ 38,643.00
Chase - 2063	4/17/2018	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 277.41
Huntington	4/19/2018	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,640.47

AMEX	4/20/2018	DNCSS NATIONWIDEINSE COLUMBUS OH	\$ 202.44
AMEX	4/21/2018	DNCSS NATIONWIDE RET COLUMBUS OH	\$ 89.23
Chase - 2063	4/23/2018	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 53.03
Huntington	5/5/2018	BLUEJACKETS 614-246-3350 OH	\$ 10,250.00
Huntington	5/7/2018	DNCSS NATIONWIDEINSEAT COLUMBUS OH	\$ 109.62
Huntington	5/7/2018	DNCSS NATIONWIDESUITES COLUMBUS OH	\$ 1,857.67
Huntington	5/7/2018	DNCSS NATIONWIDE CLUB COLUMBUS OH	\$ 50.00
Huntington	5/17/2018	BLUEJACKETS 614-246-3350 OH	\$ 3,000.00
354325	9/11/2018	COLHOC LIMITED PARTNERSHIP	\$ 100,250.00
357570	2/15/2019	COLHOC LIMITED PARTNERSHIP	\$ 51,626.00
357855	3/1/2019	COLUMBUS BLUE JACKETS	\$ 12,500.00
358973	4/23/2019	COLUMBUS BLUE JACKETS	\$ 9,950.00
362282	8/24/2019	COLHOC LIMITED PARTNERSHIP	\$ 43,135.00
363343	10/8/2019	COLHOC LIMITED PARTNERSHIP	\$ 46,704.00
365826	1/25/2020	COLHOC LIMITED PARTNERSHIP	\$ 27,567.00
369572	10/16/2020	COLHOC LIMITED PARTNERSHIP	\$ 46,172.33

TICKETS, FOOD, BEVERAGES, AND ALCOHOL FOR EVENTS AT OSU/ THE SCHOTT: \$351,282.99

Check # / Card	Date	Description	Amount
AMEX	5/21/2015	OSU TICKETNG CNP COLUMBUS OH	\$ 4,550.00
AMEX	6/1/2015	5OHIO STATEUNI (B) 4 COLUMBUS OH	\$ 1,786.41
Chase - 6327	6/13/2015	OSU TICKET OFFICE 614-292-2624 OH	\$ 4,500.00
Chase - 6327	6/17/2015	OSU TICKET OFFICE 614-292-2624 OH	\$ 1,584.00
Chase - 6327	6/19/2015	OSU TICKET OFFICE 614-292-2624 OH	\$ 4,500.00
Chase - 6327	6/20/2015	5OHIO STATEUNI15979206 COLUMBUS OH	\$ 129.39
Chase - 6327	6/20/2015	5OHIO STATEUNI15979206 COLUMBUS OH	\$ 129.39
Chase - 6327	6/21/2015	5OHIO STATEUNI15979206 COLUMBUS OH	\$ 1,706.90
Chase - 6327	6/21/2015	5OHIO STATEUNI15979206 COLUMBUS OH	\$ 1,547.89
Chase - 6327	12/1/2015	5OHIO STATEUNI15978208 COLUMBUS OH	\$ 988.08
AMEX	12/28/2015	5OHIO STATEUNI (A) 4 COLUMBUS OH	\$ 95.14
AMEX	12/28/2015	5OHIO STATEUNI (A) 4 COLUMBUS OH	\$ 1,015.39
AMEX	12/31/2015	5OHIO STATEUNI (A) 4 COLUMBUS OH	\$ 704.07

AMEX	12/31/2015	5OHIO STATEUNI (A) 4 COLUMBUS OH	\$ 593.18
Chase - 6327	3/29/2016	OSU TICKET OFFICE 614-292_2624 OH	\$ 544.00
Huntington	4/4/2016	SCHOTTENSTEIN CENTER 0111111111 OH	\$ 8,000.00
Huntington	4/5/2016	SCHOTTENSTEIN CENTER 0111111111 OH	\$ 4,500.00
Huntington	4/12/2016	5OHIO STATEUNI15978208 COLUMBUS OH	\$ 2,390.62
Huntington	4/22/2016	5OHIO STATEUNI15978208 COLUMBUS OH	\$ 2,196.73
Huntington	4/23/2016	5OHIO STATEUNI15978208 COLUMBUS OH	\$ 1,786.86
Huntington	4/26/2016	SCHOTTENSTEIN CENTER 0111111111 OH	\$ 2,500.00
Huntington	4/28/2016	5OHIO STATEUNI15978208 COLUMBUS OH	\$ 1,365.88
Huntington	5/11/2016	OSU TICKET OFFICE COLUMBUS OH	\$ 1,424.00
Huntington	5/15/2016	5OHIO STATEUNI15978208 COLUMBUS OH	\$ 1,090.22
Huntington	5/28/2016	OSU TICKET OFFICE 614-292-2624 OH	\$ 13,775.00
Huntington	6/14/2016	OSU TICKET OFFICE 614-292-2624 OH	\$ 2,600.00
Huntington	6/15/2016	OSU TICKET OFFICE 614-292-2624 OH	\$ 2,960.00
Huntington	6/18/2016	5OHIO STATEUNI15979206 COLUMBUS OH	\$ 1,457.51
Huntington	6/19/2016	5OHIO STATEUNI15979206 COLUMBUS OH	\$ 190.28
Huntington	6/19/2016	5OHIO STATEUNI15979206 COLUMBUS OH	\$ 2,283.71
Huntington	6/19/2016	5OHIO STATEUNI15979206 COLUMBUS OH	\$ 2,899.39
336331	8/16/2016	OHIO STATE UNIVERSITY	\$ 23,000.00
337254	9/20/2016	THE OHIO STATE UNIVERSITY FOUN	\$ 27,000.00
Chase - 6327	11/6/2016	5OHIO STATEUNI 5979511 COLUMBUS OH	\$ 837.37
Chase - 6327	11/17/2016	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,141.71
Chase - 6327	11/25/2016	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,001.27
Huntington	12/20/2016	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,354.57
Huntington	12/22/2016	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 860.64
Huntington	12/29/2016	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 2,544.69
Chase - 6327	1/5/2017	5OHIO STATEUNI15979511 COLUMBUS	\$ 153.39

		OH	
Chase - 6327	1/6/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 966.89
Huntington	1/12/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 160.00
Chase - 6327	1/13/2017	5OHIO STATEUNI 15979511 COLUMBUS OH	\$ 346.83
Huntington	1/14/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 95.14
Huntington	1/15/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,064.48
Huntington	1/22/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,579.75
Huntington	1/25/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,456.19
Huntington	1/31/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 772.39
Huntington	1/31/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,511.16
Huntington	1/31/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 6,175.40
Huntington	2/4/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ (600.00)
Huntington	2/4/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 56.00
Huntington	2/8/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,062.96
Huntington	2/18/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,487.85
Huntington	2/22/2017	LEVY CRDT RFND90075003 CHICAGO IL	\$ (257.70)
Huntington	2/23/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 831.78
Huntington	2/24/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 533.00
Huntington	3/2/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ (1,055.40)
Huntington	3/4/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 744.16
Chase - 6327	3/4/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 135.97
Huntington	4/4/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 286.00
Huntington	4/5/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 549.00
Huntington	4/8/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 528.00
AMEX	4/10/2017	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 1,242.43
AMEX	4/20/2017	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 1,470.87
AMEX	4/24/2017	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 1,514.00
Huntington	4/27/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 669.00
AMEX	5/12/2017	TM - OHIO STATE UNIV COLUMBUS OH	\$ 11,360.00
AMEX	5/15/2017	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 1,372.75

AMEX	5/16/2017	TM -OHIO STATE UNIVE COLUMBUS OH	\$ 20,250.00
Huntington	5/16/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 2,062.50
Huntington	5/22/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,491.59
Huntington	5/25/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 295.00
Huntington	6/7/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,891.02
Huntington	6/10/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 2,272.00
Huntington	6/10/2017	5OHIO STATEUNI15978521 COLUMBUS OH	\$ 4,344.66
Huntington	6/10/2017	5OHIO STATEUNI15978521 COLUMBUS OH	\$ 2,287.21
Huntington	6/11/2017	5OHIO STATEUNI15978521 COLUMBUS OH	\$ 2,416.49
Huntington	6/11/2017	5OHIO STATEUNI15978521 COLUMBUS OH	\$ 3,462.10
Huntington	8/9/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 430.00
Huntington	8/17/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 215.00
AMEX	8/23/2017	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 597.78
345738	9/1/2017	THE OHIO STATE UNIVERSITY FOUNDATION	\$ 27,000.00
Chase - 6327	9/2/2017	OSU TICKET OFFICE 614_292-2624 OH	\$ 395.00
AMEX	9/21/2017	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 2,006.83
Huntington	10/3/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 1,300.00
Huntington	10/13/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 1,328.00
AMEX	10/20/2017	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 1,887.00
Huntington	11/2/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 104.00
AMEX	11/6/2017	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 1,576.52
AMEX	11/13/2017	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 294.61
347648	11/22/2017	OHIO STATE UNIVERSITY	\$ 23,000.00
AMEX	11/29/2017	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 1,261.99
AMEX	12/5/2017	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 1,015.83
Huntington	12/13/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 128.00
Huntington	12/15/2017	OSU TICKET OFFICE 614-292-2624 OH	\$ 420.00
AMEX	12/18/2017	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 1,140.99
Huntington	12/27/2017	OSU TICKET OFFICE COLUMBUS OH	\$ 830.00
AMEX	12/29/2017	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 1,219.53
Huntington	12/30/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,629.22
Huntington	12/31/2017	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,333.10
Huntington	1/6/2018	OSU TICKET OFFICE 614-292-2624 OH	\$ 68.00
Chase - 2063	1/11/2018	& 5OH10 STATEUNI15979511 COLUMBUS	\$ 94.45



		OH	
Chase - 2063	1/17/2018	& OSU TICKET OFFICE 614-292-2624 OH	\$ 68.00
Huntington	1/18/2018	OSU TICKET OFFICE 614-292-2624 OH	\$ 558.00
AMEX	1/23/2018	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 577.55
AMEX	1/31/2018	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 498.90
Huntington	2/10/2018	OSU TICKET OFFICE 614-292-2624 OH	\$ 360.00
Huntington	2/10/2018	OSU TICKET OFFICE 614-292-2624 OH	\$ 196.00
AMEX	2/12/2018	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 1,362.58
Huntington	2/15/2018	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,581.14
Huntington	2/20/2018	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,143.51
Huntington	2/23/2018	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,295.75
Huntington	3/7/2018	OSU TICKET OFFICE 614-292-2624 OH	\$ 1,861.30
Huntington	3/14/2018	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,413.60
Huntington	3/22/2018	OSU TICKET OFFICE 614-292-2624 OH	\$ 1,295.88
Huntington	4/5/2018	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,840.22
Huntington	4/6/2018	OSU TICKET OFFICE 614-292-2624 OH	\$ 215.98
Huntington	4/12/2018	OSU TICKET OFFICE 614-292-2624 OH	\$ 646.00
AMEX	4/18/2018	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 631.44
Huntington	4/21/2018	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 1,339.02
Huntington	4/21/2018	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 501.03
Huntington	4/24/2018	OSU TICKET OFFICE 614-292-2624 OH	\$ 1,188.00
AMEX	4/30/2018	5OHIO STATEUNI 60411 COLUMBUS OH	\$ 734.92
Huntington	5/3/2018	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 971.97
353865	8/21/2018	OHIO STATE UNIVERSITY	\$ 50,000.00
Huntington	1/18/2019	5OHIO STATEUNI15979511 COLUMBUS OH	\$ 953.20
Capital One	4/5/2019	OSU TICKET OFFICE COLUMBUS OH	\$ 254.00

In addition to the Barter Account conduct and the Nationwide Arena/Schott conduct, credit cards were used by Stalf, Fingerhut, Greg Bell, and John Doe 1 for personal activities including but not limited to what is seen below:

Cardholder	Account	Date	Description	Debit
Tom Stalf	5582_5086_4220_6327	02/25/2015	APL ITUNES.com/BILL 866-712-7753 CA	-\$12.82
Tom Stalf	5582_5086_4220_6327	02/25/2015	APUITUNES.com/BILL 866-	-\$12.82

			712_7753 CA	
Greg Bell	5582_5086_4220_6327	03/28/2015	IRS TAX PRO PTIN FEE 877-613_7848 VA	-\$63.00
Peter Fingerhut	5582_5086_4220_6327	07/10/2015	AVI CATERING BY DESIGN 330-372-6000 OH	-\$411.60
Peter Fingerhut	5582_5086_4220_6327	07/12/2015	OHIO THEATER 06144691045 OH	-\$48.40
Peter Fingerhut	5582_5086_4220_6327	07/12/2015	OHIO THEATER 0614469104.5 OH	-\$184.10
Gregory Bell	5582_5086_4220_6327	12/22/2015	IRS TAX PRO PTIN FEE 877-613-6846 VA	-\$50.00
Peter Fingerhut	5582_5086_4220_6327	05/27/2016	5COLUMBUS CLPR11358207 COLUMBUS OH	-\$925.83
Peter Fingerhut	5582_5086_4220_6327	07/12/2016	AVI CATERING BY DESIGN 330-372-6000QH	- \$1,028.10
Peter Fingerhut	5582_5086_4220_6327	07/17/2016	MCCOY THEATER 06144891045 OH	-\$278.70
Peter Fingerhut	5582_5086_4220_6327	07/19/2016	AVI CATERING BY DESIGN 330-372_8000 OH	
Peter Fingerhut	5582_5086_4220_6327	07/20/2016	AVI CATERING BY DESIGN 330-372-6000 OH	-\$819.50
Peter Fingerhut	5582_5086_4220_6327	07/20/2016	BUCKEYE BOOSTERS 614-326-3300OH	- \$3,158.00
Peter Fingerhut	5582_5086_4220_6327	07/25/2016	MCCOY THEATER COLUMBUS OH	-\$293.00
Peter Fingerhut	5582_5086_4220_6327	08/01/2016	5COLUMBUS CLPR11358207 COLUMBUS OH	- \$1,040.75
Peter Fingerhut	5582_5086_4220_6327	02/21/2017	SOUTHWES 5262608971245 800-435-9792 TX	-\$40.00
Peter Fingerhut	5582_5086_4220_6327	02/22/2017	SOUTHWES 5262608981388 800-435-9792 TX	-\$40.00
Peter Fingerhut	5582_5086_4220_6327	03/16/2017	STOGIES POWELL OH	-\$49.52
Gregory Bell	5582_5086_4220_6327	03/25/2017	IRS TAX PRO PTIN FEE 877-613-7846 VA	-\$50.00
Peter Fingerhut	5582_5086_4220_6327	06/13/2017	DUBLIN EVENTS ONLINE 6144104510 OH	-\$300.00
Peter Fingerhut	5582_5086_4220_6327	07/18/2017	AVI CATERING BY DESIGN 330-372-6000 OH	-\$715.20
Peter Fingerhut	5582_5086_4220_6327	07/23/2017	OHIO THEATER COLUMBUS OH	-\$181.90
Peter Fingerhut	5582_5086_4220_6327	11/12/2017	SOUTHWES 5265565974347 800-435-9792 TX	-\$40.00
Peter Fingerhut	4246_3152_4552_2063	05/12/2018	CLOVERLEAF RESIDENCE S DUBLIN OH	-\$313.74

Peter Fingerhut	4246_3152_4552_2063	05/12/2018	CLOVERLEAF RESIDENCE S DUBLIN OH	-\$313.74
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In addition, Zoo account credit cards were used by Stalf, Fingerhut, and Greg Bell for personal reasons unrelated to Columbus Zoo activities found on the following non-exclusive list:

1. \$1,141.60 Buckeye Country fest
2. \$1,125.58 Columbus Clippers—Stalf
3. \$2,255.00 Cincinnati Reds-Stalf
4. \$1,449.20 Airline trip to Montana spouse of an executive
5. \$1,449.20 Airline trip to Montana relative of an executive
6. \$1,603.86 Phantom of Opera—Stalf
7. \$1,070.20 Six Car Rent a Car Spring Break Magic Kingdom—Stalf
8. \$545.00 Delta Club membership—Stalf
9. \$1,028.10 AVI Catering –Fingerhut
10. 1,040.75 Columbus Clippers—Fingerhut

In addition to the type of conduct which resulted in theft as described above, Stalf and Greg Bell rented two separate houses owned by the Columbus Zoo for a significant discount to relatives in one instance (Stalf) the Zoo expended thousands of dollars to remodel the property only for Stalf to rent the property to his relatives. The value of the theft (exercise control over zoo property beyond the express or implied consent) This conduct occurred between 2014 and 2021 and resulted in the following sum being stolen from the zoo: \$81,320.00.

**INCIDENT TWO**                      **Bribery, §2921.02, F3**  
**Defendants**                              Pete Fingerhut  
**Date of Offense**                      On or about December 18, 2018

The Defendant unlawfully did knowingly solicit or accept for himself or another person any valuable thing or valuable benefit, to wit: \$10,000.00, to corrupt or improperly influence him or another public servant or party official with respect to the discharge of his or the other public servant's or party official's duty, either before or after he was elected, appointed, qualified, employed, summoned, or sworn as a public servant or party official. Did solicit a \$10,000.00 bribe From Business 1.

**INCIDENT THREE**                      **Bribery, §2921.02, F3**  
**Defendants**                              Pete Fingerhut  
**Date of Offense**                      On or about December 18, 2019

The Defendant unlawfully did knowingly solicit or accept for himself or another person any valuable thing or valuable benefit, to wit: \$10,000.00, to corrupt or improperly influence him or another public servant or party official with respect to the discharge of his or the other public servant's or party official's duty, either before or after he was elected, appointed, qualified, employed, summoned, or sworn as a public servant or party official. Being a public servant did solicit a \$10,000.00 bribe from Business 1.

**INCIDENT FOUR****Tampering with Records, §2913.42, F4****Defendants**

Tom Stalf,

**Date of Offense**

On or about May 3, 2018

The defendant(s) unlawfully did, knowing the defendant(s) had no privilege to do so, and with purpose to defraud or knowing that they was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Association utter a writing or record, to wit: a Change order hand written on a piece of paper in May of 2018, knowing it to have been tampered with as provided in division (A)(1) of this section 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. On a handwritten note creating a change order to secure or defraud \$125,000.00 from the Columbus Zoo when said change order had false information written on it.

**INCIDENT FIVE****Bribery, §2921.02, F3****Defendants**

Tom Stalf

**Date of Offense**

On or about 5/18/2016 through 5/3/2018

The Defendant(s) unlawfully did knowingly solicit or accept for Tom Stalf or another person any valuable thing or valuable benefit, to wit: Sporting events tickets, plane transportation, an extension to a building on his real property and additional goods and services, to corrupt or improperly influence him or another public servant or party official with respect to the discharge of his or the other public servant's or party official's duty, either before or after he was elected, appointed, qualified, employed, summoned, or sworn as a public servant or party official.

Soliciting and or accepting from John Doe 4/Business 4 benefits including but not limited to: tickets to sporting events including Game 1 of the 2016 Eastern Conference finals, flying Stalf to the Masters golf tournament and other sporting events, Cleveland Cavalier tickets, extending a storage unit on Stalf's real property for substantially less than it cost to construct and with the labor apparently in return for the awarding of a no-bid contract at the Wilds to Business 4/John Doe 4 to construct 7 cabins at a cost exceeding \$2,000,000.00. Such contract being let in violation of long-standing Zoo practice because the contract was not put up to bid.

**INCIDENT SIX****Extortion, §2905.11, F3****Defendants**

Pete Fingerhut

**Date of Offense**

On or about December 18, 2018

The Defendant unlawfully did with purpose to induce another to do an unlawful act expose or threaten to expose any matter tending to subject Business 1 to hatred, contempt, or ridicule, or to damage Business 1's personal or business repute, or to impair Business 1's credit. Fingerhut did threaten to harm Business 1 unless it paid Fingerhut \$10,000.00. Fingerhut a few months later went to Albania, the only evidence of credit card usage by Fingerhut in Albania or his spouse was the hotel they stayed at.

**INCIDENT SEVEN****Extortion, §2905.11, F3****Defendants**

Pete Fingerhut

**Date of Offense**

On or about December 18, 2020

The Defendant(s) unlawfully did with purpose to induce another to do an unlawful act expose or threaten to expose any matter tending to subject Business 1 to hatred, contempt, or ridicule, or to damage Business 1's personal or business repute, or to impair Business 1's credit. Fingerhut did threaten to harm Business 1 if it did not pay him \$10,000.00.

### **TAMPERING WITH GOVERNMENTAL RECORDS—TAX RETURN**

The following incidents of corrupt activity relate to Stalf and Fingerhut falsifying their Federal and State Income tax returns by failing to report tens of thousands of dollars in income earned between 2015 and 2020. In addition to not reporting Bribe income the pair received during this period of time, the duo failed to report reportable income earned as follows:

1. Fingerhut and the Director of Marketing diverted funds allocated to certain media to a media company called Business 3. Business 3 had a program to award those who advertise on it meeting a high threshold of spending dollars by providing a cruise or a vacation to members of the organization.
2. Fingerhut diverted funds to Business 3 so that the Columbus Zoo, a non-profit/public organization would spend the amount of money needed so that Business 3 would provide Fingerhut and Stalf with the ability to benefit as other high-spending advertisers with Business 3 would.
3. Business 3, after a trip in 2017, on September 27, 2017 provided Greg Bell with the following document which is a sample of a letter received by Bell from 2015 to 2020.

Dear Sir or Madam,

First and most importantly, we want you to know how much we appreciate your business and the confidence you have shown by investing your advertising dollars with [REDACTED]

We are pleased that the Columbus Zoo and Aquarium qualified for our sales incentive trip to the Galapagos Islands from October 19-28, 2017. We hope that Pete and Joni Fingerhut are as excited about the trip as we are.

The value of this special trip is estimated at \$26,000, or \$13,000 per person. If you have questions regarding the taxability of the trip please consult your tax advisor for further guidance.

Again, we appreciate your business and hope Pete and Joni enjoy the trip.

Sincerely,

4. Upon receipt of a letter such as this Bell prepared 1099s for Fingerhut and Stalf. Stalf informed Bell that he would be fired if he handed him or processed the 1099s. The 1099s were destroyed. Fingerhut and Stalf's income tax returns for the applicable years do not show that these benefits were claimed as taxable income, which these benefits should have been listed as income but for Greg Bell was ordered not to provide 1099s.

**INCIDENT EIGHT**            **Tampering with Records, §2913.42, F3**  
**Defendants**                    Tom Stalf  
**Date of Offense**            On or about April 15, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on United States/IRS/United States Department of Treasury falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2016 Federal Income Tax Return and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity. Stalf falsified in 2016 Federal income tax return. He failed to report the income and had evidence of the income hidden or destroyed income derived from an elaborate vacation provided as a benefit by a Columbus Media organization.

**INCIDENT NINE**            **Tampering with Records, §2913.42, F3**  
**Defendants**                    Tom Stalf  
**Date of Offense**            On or about April 15, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on State of Ohio falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2016 State of Ohio Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity. Stalf falsified his 2016 State Income tax return. He failed to report the income and had evidence of the income hidden or destroyed income derived from an elaborate vacation provided as a benefit by a Columbus Media organization.

**INCIDENT TEN**            **Tampering with Records, §2913.42, F3**  
**Defendants**                    Pete Fingerhut  
**Date of Offense**            On or about April 14, 2016

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on United States/IRS/United States Department of Treasury falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2015 Federal Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity. Fingerhut falsified his 2015 Federal Income tax return. He failed to report the income and had evidence of the income hidden or destroyed income derived from an elaborate vacation provided as a benefit by a Columbus Media organization.

**INCIDENT ELEVEN**        **Tampering with Records, §2913.42, F3**  
**Defendants**                    Pete Fingerhut  
**Date of Offense**            On or about April 15, 2016

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on State of Ohio falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2016 State of Ohio Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal

governmental entity. Fingerhut falsified his 2015 Ohio Income tax return. He failed to report the income and had evidence of the income hidden or destroyed income derived from an elaborate vacation provided as a benefit by a Columbus Media organization.

**INCIDENT TWELVE**      **Tampering with Records, §2913.42, F3**  
**Defendants**                      Pete Fingerhut  
**Date of Offense**              On or about April 15, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on United States/IRS/United States Department of Treasury falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2017 Federal Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity. Fingerhut falsified his 2016 Federal Income tax return. He failed to report the income and had evidence of the income hidden or destroyed income derived from an elaborate vacation provided as a benefit by a Columbus Media organization.

**INCIDENT THIRTEEN**      **Tampering with Records, §2913.42, F3**  
**Defendants**                      Pete Fingerhut  
**Date of Offense**              On or about April 15, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on State of Ohio falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2017 State Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity. Fingerhut falsified his 2016 State Income tax return. He failed to report the income and had evidence of the income hidden or destroyed income derived from an elaborate vacation provided as a benefit by a Columbus Media organization.

**INCIDENT FOURTEEN**      **Tampering with Records, §2913.42, F3**  
**Defendants**                      Pete Fingerhut  
**Date of Offense**              On or about April 15, 2018

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on United States/IRS/United States Department of Treasury falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2017 Federal Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity. Fingerhut falsified his 2017 Federal Income tax return. He failed to report the income and had evidence of the income hidden or destroyed income derived from an elaborate vacation provided as a benefit by a Columbus Media organization.

**INCIDENT FIFTEEN**      **Tampering with Records, §2913.42, F3**  
**Defendants**                      Pete Fingerhut  
**Date of Offense**              On or about April 15, 2018

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on State of Ohio falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2017 State of Ohio Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity. Fingerhut falsified his 2017 State Income tax return. He failed to report the income and had evidence of the income hidden or destroyed income derived from an elaborate vacation provided as a benefit by a Columbus Media organization.

**INCIDENT SIXTEEN      Tampering with Records, §2913.42, F3**  
**Defendants**                      Pete Fingerhut  
**Date of Offense**                On or about April 15, 2020

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on United States/IRS/United States Department of Treasury falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2019 Federal Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity. Fingerhut falsified his 2019 Federal Income tax return. He failed to report the income and had evidence of the income hidden or destroyed income derived from an elaborate vacation provided as a benefit by a Columbus Media organization.

**INCIDENT SEVENTEEN Tampering with Records, §2913.42, F3**  
**Defendants**                      Pete Fingerhut  
**Date of Offense**                On or about April 15, 2020

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on State of Ohio falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: 2019 State of Ohio Income Taxes and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity. Fingerhut falsified his 2019 State Income Tax return. He failed to report the income and had evidence of the income hidden or destroyed income derived from an elaborate vacation provided as a benefit by a Columbus Media organization.

**THE FOLLOWING INCIDENTS OF CORRUPT ACTIVITY RELATED TO THE 1.5 MILLION DOLLAR TICKET SCAM FINGERHUT, GREG BELL AND STALF RAN. QUARTERBACKED BY FINGERHUT WHO NEGOTIATED THE LEASES FOR THE SUITES WITH THE BLESSINGS OF GREG BELL AND STALF, THE THREE FALSIFIED SCORES OF DOCUMENTS, CHECK USAGE FORMS (or authorization forms) AND CREDIT CARD USAGE FORMS TO WATCH HOCKEY, COLLEGE BASKETBALL, BASEBALL, CONCERTS, MONSTER TRUCKS, MIRANDA LAMBERT, BRUCE SPRINGSTEEN, GARTH BROOKS, AC/DC AND MORE ALL ON THE ZOO'S DIME. THE ZOO CREDIT CARD USAGE OR AUTHORIZATION FORM IS A FORM WHICH IS FILLED OUT BY A ZOO EMPLOYEE WHO HAS A ZOO CREDIT CARD OR WHO USED A ZOO CREDIT CARD TO DOCUMENT THAT THE USAGE WAS ZOO RELATED OR IN THE COURSE OF ZOO BUSINESS. IT IS A FORM THAT JUSTIFIES THE USAGE OF THE CREDIT CARD. THE ZOO CHECK REQUEST FORM IS A FORM THAT REQUESTS A CHECK BE ISSUED TO PAY A VENDOR WHO PERFORMED**



**A SERVICE FOR THE ZOO.**

**SEATS WERE DEDICATED TO FAMILY MEMBERS OF GREG BELL, STALF OR FINGERHUT. FAMILY MEMBERS ACTUALLY MADE A LIST LIKE A CHILD MAKES A CHRISTMAS LIST OF EVENTS TO GO TO AT EITHER LOCATION DURING ANY GIVEN YEAR. THE THREE WOULD HONOR THE REQUESTS. TO ACCOMPLISH THIS SCHEME MONEY WAS LAUNDERED, TELECOMMUNICATION DEVICES WERE USED AS WERE A PAPER CUTTER/SCISSORS, GLUE AND/OR TAPE AND/OR WHITE OUT TO ALTER INVOICES.**

**INCIDENT EIGHTEEN Tampering with Records, §2913.42, F4**

**Defendants** Greg Bell

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

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Credit Card Authorization Form 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. \$25,000.00 provided to the Columbus Blue Jackets as payment for the suite or loge that Fingerhut negotiated under the code: Promotional Support.

**INCIDENT NINETEEN Tampering with Records, §2913.42, F5**

**Defendants** Pete Fingerhut

**Date of Offense** On or about October 23, 2017

The Defendant unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Credit Card Authorization Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Nationwide Arena luxury suites bill in the amount of \$1,827.42 including a \$200.00 tip for consuming alcohol and eating under the purpose: Tom Stalf.

**INCIDENT TWENTY Tampering with Records, §2913.42, F5**

**Defendants** Tom Stalf, Pete Fingerhut

**Date of Offense** On or about January 17, 2015

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Stalf and Fingerhut falsified a credit card record so the Columbus Zoo would pay for Pete Fingerhut attending the Miranda Lambert Concert at Nationwide Arena

and eat and drink.

**INCIDENT TWENTY-ONE**      **Tampering with Records, §2913.42, F5**  
**Defendants**                      Tom Stalf  
**Date of Offense**                On or about March 11, 2015

The Defendant unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Stalf falsified a Credit Card Authorization form so that the wife of a Zoo executive and others could attend a Maroon 5 concert paid for by the Columbus Zoo.

**INCIDENT TWENTY-TWO**      **Tampering with Records, §2913.42, F5**  
**Defendants**                      Peter Fingerhut  
**Date of Offense**                October 21, 2011

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoo billing records and the value of the data or computer software involved in the offense or the loss to the victim was greater than seven thousand five hundred dollars. Fingerhut falsified records so the Zoo would pay for \$15,000.00 worth of Hockey tickets.

**INCIDENT TWENTY-THREE**      **Tampering with Records, §2913.42, F4**  
**Defendants**                      Tom Stalf, Greg Bell, Pete Fingerhut  
**Date of Offense**                On or about April 4, 2016

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form 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. The defendants falsified a Columbus Zoo Credit Card Authorization Form so that the Columbus Zoo would pay for the defendants attending a Garth Brooks concert.

**INCIDENT TWENTY-FOUR**      **Tampering with Records, §2913.42, F5**  
**Defendants**                      Tom Stalf  
**Date of Offense**                On or about January 24, 2019

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or

computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Stalf falsified an email to secure Hamilton tickets at the Ohio Theater valued at \$1,000.00 a piece for his family members that the Zoo paid for.

**INCIDENT TWENTY-FIVE**      **Tampering with Records, §2913.42, F5**  
**Defendants**                      Tom Stalf  
**Date of Offense**                On or about January 31, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Stalf falsified a Columbus Zoo Credit Card Authorization Form so the defendant would be able to have the Zoo pay for him to take his son's basketball team to an Ohio State University basketball game sitting in a suite.

**INCIDENT TWENTY-SIX**      **Tampering with Records, §2913.42, F4**  
**Defendants**                      Tom Stalf, Greg Bell  
**Date of Offense**                On or about April 6, 2015

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form 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. Here a form was falsified by Stalf and Bell so that the Columbus Zoo would pay \$10,000.00 for Columbus Blue Jackets tickets. Fingerhut negotiated the deal. Stalf and Bell had the Zoo pay for it. At Fingerhut's instructions the Columbus Zoo did not have its name on the suite as most organizations did. Furthermore, there is no evidence that the Board of Directors of the Columbus Zoo authorized the purchases or lease of a suite, loge, or tickets.

**INCIDENT TWENTY-SEVEN**      **Tampering with Records, §2913.42, F4**  
**Defendants**                      Tom Stalf, Greg Bell  
**Date of Offense**                On or about June 9, 2015

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form 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. These defendants did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses at Levy Restaurant.

**INCIDENT TWENTY-EIGHT**      **Tampering with Records, §2913.42, F5**

**Defendants** Tom Stalf, Pete Fingerhut  
**Date of Offense** On or about June 23, 2015

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. The defendants falsified a Credit Card Authorization Form so the Zoo would pay for personal expenses such as eating and drinking and consuming alcohol at Huntington Park.

**INCIDENT TWENTY-NINE** **Telecommunications Fraud, §2913.05, F4**  
**Defendants** Pete Fingerhut  
**Date of Offense** On or about November 2, 2016

The Defendant(s) unlawfully having devised a scheme to defraud, did knowingly disseminate, transmit, or caused to disseminated or transmitted by means of wire, radio, satellite, telecommunication, telecommunications device, or telecommunication services any writing, data, sign, signal, picture, sound, 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 five thousand dollars or more but less than one hundred thousand dollars. Lying to IMS Barter in an email about who when to Game 6 of the 2016 World Series using tickets the Zoo paid for. Stalf used them personally value \$9,400.00

**INCIDENT THIRTY** **Tampering with Records, §2913.42, F5**  
**Defendants** Tom Stalf  
**Date of Offense** On or about September 28, 2015

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Stalf did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses of \$1,191.43 at Nationwide Arena.

**INCIDENT THIRTY-ONE** **Tampering with Records, §2913.42, F5**  
**Defendants** Pete Fingerhut  
**Date of Offense** On or about September 30, 2015

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Fingerhut did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses at Huntington Park and Nationwide Arena.

**INCIDENT THIRTY-TWO****Defendants****Date of Offense****Tampering with Records, §2913.42, F5**

Tom Stalf, Pete Fingerhut

On or about December 9, 2015

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. The pair falsified a Credit Card Authorization Form so the Zoo would pay for personal expenses at Nationwide Arena for a hockey game(s) in excess of two thousand dollars.

**INCIDENT THIRTY-THREE****Defendants****Date of Offense****Tampering with Records, §2913.42, F5**

Tom Stalf

On or about January 6, 2016

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Stalf did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses at Nationwide Arena and other locations.

**INCIDENT THIRTY-FOUR****Defendants****Date of Offense****Tampering with Records, §2913.42, F5**

Pete Fingerhut

On or about April 20, 2016

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Fingerhut did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses of \$1,519.39 at Nationwide Arena.

**INCIDENT THIRTY-FIVE****Defendants****Date of Offense****Tampering with Records, §2913.42, F4**

Tom Stalf, Greg Bell

On or about April 27, 2016

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form 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. These defendants did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses including a suite at the Schottenstein Center at OSU as well as other personal expenses.

**INCIDENT THIRTY-SIX Tampering with Records, §2913.42, F5**

**Defendants** Pete Fingerhut

**Date of Offense** On or about July 30, 2016

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. This is the Peter Fingerhut trip to Norman, Oklahoma scam. Fingerhut falsified a Credit Card Authorization Form so the Zoo would pay for personal expenses. The Zoo was tricked into paying for Fingerhut's trip to an OSU Football game in Norman, Oklahoma when Fingerhut disguised the trip invoice as payment for an ad. (\$3158.00 at Buckeye Boosters, \$1,028.10 at AVI) as seen on the following page:





Buckeye Boosters, Inc.  
921 Chatham Lane Suite 301-F  
Columbus, Ohio 43221

To Pete Fingerhut  
Columbus Zoo  
PO Box 400  
Powell, OH 43065

Description	Total
Promotional Support / Advertising	\$3,158
	\$3,158

Check or Credit Card- M/C, Visa, Disc 5582.5086.4220.7127

Exp. Date: 09/18 CVV# 640

I agree to allow Buckeye Boosters to charge the above card. Signature:

Thank You

**INCIDENT THIRTY-SEVEN**

**Defendants**

**Date of Offense**

**Tampering with Records, §2913.42, F5**

Pete Fingerhut

On or about September 3, 2016

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Fingerhut did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses in and Huntington Park suite in excess of \$1,600.00.



**INCIDENT THIRTY-EIGHT**      **Tampering with Records, §2913.42, F5**  
**Defendants**                      Tom Stalf  
**Date of Offense**              On or about February 3, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Stalf did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses. (\$ 772.39 at Levy Restaurants, \$1,511.16 at Levy Restaurants, and \$966.89 at Levy Restaurants)

**INCIDENT THIRTY-NINE**      **Tampering with Records, §2913.42, F5**  
**Defendants**                      Tom Stalf  
**Date of Offense**              On or about February 8, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Stalf did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses. (\$1064.00, \$1456.19, and \$1579.15 all at Levy Restaurants, all food and beverages)

**INCIDENT FORTY**              **Tampering with Records, §2913.42, F5**  
**Defendants**                      Pete Fingerhut  
**Date of Offense**              On or about May 1, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Fingerhut did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses. (\$1619.61 at Nationwide Arena, \$439.51 at Columbus Blue Jackets)

**INCIDENT FORTY-ONE** **Tampering with Records, §2913.42, F4**  
**Defendants**                      Greg Bell  
**Date of Offense**              On or about May 1, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software,





[PDF Receipt Download](#)

**Premium Suites  
at Ohio State University  
Receipt**

**Other 17**  
Order # 1773095

Wednesday, June 7, 2017  
Tom Petty

**Food & Drink**

Subtotal	\$1242.30
Service Charge	\$223.61
Tax	\$109.94
Food & Drink Gratuity	\$315.17

Please note that all food and beverage items are subject to an 18% service charge plus applicable sales tax. The service charge is not a tip or gratuity and is not distributed to service employees. Additional payment for tips or gratuity for service, if any is voluntary and at your discretion.

**Total** **\$1891.02**  
mastercard ZOO/ZOO 7108

[PDF Receipt Download](#)

**Premium Suites  
at OSU Stadium  
Receipt**

**Other 15**  
Order # 1794433

Saturday, June 10, 2017  
Country Music Fest

**Food & Drink**

Subtotal	\$3109.70
Service Charge	\$559.75
Tax	\$275.21
Food & Drink Gratuity	\$400.00

Please note that all food and beverage items are subject to an 18% service charge plus applicable sales tax. The service charge is not a tip or gratuity and is not distributed to service employees. Additional payment for tips or gratuity for service, if any is voluntary and at your discretion.

**Total** **\$4344.66**  
 mastercard CZ/CZ 7108

**INCIDENT FORTY-THREE**      **Tampering with Records, §2913.42, F4**  
**Defendants**                      Tom Stalf, Greg Bell  
**Date of Offense**                On or about June 18, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form 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. Stalf and Bell did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses. (\$20,250.00 Ohio State University for Suite Tickets, the invoice reflected that the bill was for promotional support, the code word Fingerhut, Bell and Stalf came up with to disguise the true purpose of a particular purchase so that the Zoo would pay for their personal expenses, as part of their scheme to defraud the Zoo. \$1,372.75 to Levy Restaurants, \$801.18 Columbus Clippers food and beverages, \$1,000.00 PayPal (tickets for an event)) as seen below:

COLUMBUS ZOOLOGICAL PARK

**Credit Card Usage Form**

Last 4 digits of Credit Card used: 7011

- FIFTH THIRD BANK MASTERCARD
- CHASE MASTERCARD
- AMERICAN EXPRESS

Please fill in the date, vendor name, purpose of purchase, account number to apply charge to and the total of each purchase.

Name: CREE BELL  
(Please Print)

Date	Vendor	Purpose	Acct Number	Total
6/10/17	ARMADA CAR WASH	CLEAN ARMADA	1-7141-070	12.00
6/10/17	IAAPA	CONFERENCE REG.	1-81121-060	198.00
6/10/17	COLUMBUS SUPERMARKETS	FOOD & DRINKS FOR DONORS	2-81151-240	806.18
6/10/17	AMERICAN EXPRESS	MEMBERSHIP FEE	1-81133-060	90.00
5/30/17	SARITA SUITES	ROOM FOR VERTICAL ZOO EMP	2-81151-240	163.33
5/14/17	LEVY REST @ OSU AREA	FOOD & DRINKS FOR DONOR	2-81151-240	1,372.75
6/16/17	LEDCOLD CAFE	LUNCH w/ RAY JONES	1-81190-060	33.75
5/15/17	OSU	PROMOTIONAL SUPPORT	2-81151-240	20,250.00
6/19/17	DELUKE RESORTS	DEPOSIT	1-81121-060	200.00
6/20/17	CHASE BANC	QTR. PAYMENT	1-21514-000	74,024.55
6/23/17	BURGER KING	LUNCH FOR DOWNTOWN MTE.	1-81190-060	6.40
6/24/17	PAYPAL	TICKETS FOR DONORS	2-81151-240	1,000.00
6/24/17	HOTELS.COM	HOTEL FOR RFP GUEST	2-81151-240	140.21
6/25/17	DISCS NATURALURDE	FOOD & DRINKS FOR EVENT	2-81151-240	1,014.03
6/27/17	BOB EVANS	LUNCH w/ INSURANCE BROKER	1-81190-060	50.90
6/28/17	GIORDANO'S DA BLAN	LUNCH TO DISCUSS CONCERTS	1-81190-060	74.24
6/29/17	RED BOSTON	LUNCH w/ TOM AND DANIEL	1-81190-010	80.64
7/6/17	COLUMBUS ZOO	DRINKS FOR VIP GUESTS	2-81151-240	32.10
7/7/17	OLD BAG OF NUGS	LUNCH w/ MARKETING	1-81190-010	26.69
Please attach all receipts.			Total	5

Employee Signature: Cree Bell

Date submitted: 6/18/17

Approval Signature: [Signature]

Date approved: \_\_\_\_\_

**INCIDENT FORTY-FOUR**  
**Defendants**  
**Date of Offense**

**Tampering with Records, \$2913.42, F5**  
**Pete Fingerhut**  
**On or about July 28, 2017**

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. The Defendant did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses. (food and beverages at Huntington Park, \$1,929.70)

**INCIDENT FORTY-FIVE****Defendants****Date of Offense****Tampering with Records, §2913.42, F5**

Greg Bell, Pete Fingerhut

On or about September 29, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Bell and Fingerhut did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses. (\$922.93 Huntington Park (food and beverages) and \$1,657.10 Nationwide Arena)

**INCIDENT FORTY-SIX****Defendants****Date of Offense****Tampering with Records, §2913.42, F5**

Tom Stalf, Greg Bell

On or about October 11, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses. (The Ohio State University, \$2,006.83 food and beverages)

**INCIDENT FORTY-SEVEN****Defendants****Date of Offense****Tampering with Records, §2913.42, F5**

Greg Bell

On or about December 29, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Bell did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses as in:

\$1,261.99 Levy Restaurants

\$1,603.86 Vivid Seats

\$1,015.83 The Ohio State University

\$1,140.88 The Ohio State University

\$1,219.53 The Ohio State University

\$360.00 PayPal

**INCIDENT FORTY-EIGHT**            **Tampering with Records, §2913.42, F5**  
**Defendants**                            Greg Bell, Pete Fingerhut  
**Date of Offense**                    On or about January 20, 2018

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Fingerhut did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses as in: \$1,494.22 at The Ohio State University by falsely stating that the expense was for food and drinks for donors when the food and drinks and the entire experience was not for donors but rather was for Fingerhut's personal expenses. Bell approved it.

**INCIDENT FORTY-NINE** **Tampering with Records, §2913.42, F4**  
**Defendants**                            Tom Stalf, Pete Fingerhut  
**Date of Offense**                    On or about September 20, 2016

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Check Request Form 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. This act pertains to a check request form which stated a false reason why the Zoo funds were being spent when the actual reason Zoo funds were being spent was for the personal entertainment purposes of the defendant(s). Within this form, the reason for the expenditure of \$27,000.00 of Zoo funds was falsified. The money was spent at the Schottenstein Center at OSU.

**INCIDENT FIFTY**                    **Tampering with Records, §2913.42, F4**  
**Defendants**                            Pete Fingerhut  
**Date of Offense**                    On or about August 16, 2016

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Check Request Form 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. This count pertains to a check request form which stated a false reason why the Zoo funds were being spent when the actual reason Zoo funds were being spent was for the personal entertainment purposes of the defendant. Within this form, the reason for the expenditure of \$23,000.00 of Zoo funds was falsified. The money was spent at the Schottenstein Center at OSU as seen below:



Columbus Zoological Park Association  
9990 Riverside Drive  
P.O. Box 400  
Powell, OH 43065

AUG 16 2016

CHECK REQUEST FORM

DATE REQUIRED 8/16/16 DATE SUBMITTED 8/15/16

PAY TO: Name THE OHIO STATE UNIVERSITY  
Address ATHLETICS TICKET OFFICE  
JEROME SCHOTTENSTEIN CENTER  
555 BORROR DRIVE, ROOM 1020  
City, State, Zip COLUMBUS, OH 43210-1187

CHECK AMOUNT: \$ 23,000.00

PURPOSE/DESCRIPTION: PROMOTIONAL SUPPORT AT OSU EVENT

ACCOUNT NUMBER: 2-81151-240

CHARGE TO: \_\_\_\_\_

SPECIAL INSTRUCTIONS: \_\_\_\_\_

REQUESTED BY: PETE FINGERHUT

APPROVED BY: Greg Bell

OFFICE USE ONLY	
Vendor #	<u>01623</u>
Invoice #	_____
Account #	<u>2-81151-240</u>
	<u>23,000-</u>
P.O. #	<u>AUG 16 2016</u>
Check #	_____
Check Date	_____

**INCIDENT FIFTY-ONE Tampering with Records, §2913.42, F4**  
**Defendants** Greg Bell, Pete Fingerhut  
**Date of Offense** On or about November 22, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Check Request Form 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. This count pertains to a check request form which stated a false reason why

the Zoo funds were being spent when the actual reason Zoo funds were being spent was for the personal entertainment purposes of the defendant(s). Within this form, the reason for the expenditure of \$23,000.00 of Zoo funds was falsified. The money was spent at the Schottenstein Center at OSU as seen below:

Columbus Zoological Park Association  
9990 Riverside Drive  
P.O. Box 400  
Powell, OH 43065

11/22

CHECK REQUEST FORM

DATE REQUIRED 11/22/17 DATE SUBMITTED 11/21/17

PAY TO: Name THE OHIO STATE UNIVERSITY  
Address ATTN: KAREN RICHARD  
1040 SCHOTTENSTEIN CENTER, 555 BARRON DRIVE  
City, State, Zip COLUMBUS, OH 43210

CHECK AMOUNT: \$ 23,000.00

PURPOSE/DESCRIPTION: PROMOTIONAL SUPPORT AT OSU

ACCOUNT NUMBER: 2-81151-240

CHARGE TO: \_\_\_\_\_

SPECIAL INSTRUCTIONS: \_\_\_\_\_

REQUESTED BY: PETE FINGERHUT

APPROVED BY: Shirley A. Bell

OFFICE USE ONLY	
Vendor #	<u>01623</u>
Invoice #	_____
Account #	<u>2-81151-240</u>
	<u>23,000-</u>
P.O. #	_____
Check #	<u>NGV 22 2017</u>
Check Date	_____

**INCIDENT FIFTY-TWO Tampering with Records, §2913.42, F4**

**Defendants** Pete Fingerhut and Tom Stalf

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

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Check Request Form 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. This count pertains to a check request form which stated a false reason why the Zoo funds were being spent when the actual reason Zoo funds were being spent was for the personal entertainment purposes of the defendant(s). Within this form, the reason for the expenditure of \$27,000.00 of Zoo funds was falsified. The money was spent at the Schottenstein Center at OSU as seen below:

90014379 (3)

Columbus Zoological Park Association  
COLUMBUS ZOO AND AQUARIUM  
9990 Riverside Drive  
PO Box 400  
Powell, Ohio 43065-0400

Fifth Third Bank  
Columbus, OH  
25-216/440

CHECK NO. 345738

DATE Sep 1, 2017 AMOUNT \$27,000.00

Pay Twenty Seven Thousand Dollars and 00 Cents

VOID AFTER 120 DAYS

to the Order of:  
OHIO STATE UNIVERISTY FOUNDATION  
1040 SCHOTTENSTEIN CENTER  
555 BORROR DRIVE  
COLUMBUS, OH 43210

TWO SIGNATURES REQUIRED IF OVER \$10,000.00

Security Features Details on back

11

Columbus Zoological Park Association  
9990 Riverside Drive  
P.O. Box 400  
Powell, OH 43065

SEP 21 2017

CHECK REQUEST FORM

DATE REQUIRED 9/1/17 DATE SUBMITTED 8/31/17

PAY TO: Name THE OHIO STATE UNIVERSITY FOUNDATION  
Address SCHOTTENSTEIN CENTER BUSINESS OFFICE  
1040 SCHOTTENSTEIN CENTER  
555 BARROL DRIVE  
City, State, Zip COLUMBUS, OH 43210

CHECK AMOUNT: \$ 27,000.00

PURPOSE/DESCRIPTION: PROMOTIONAL EFFORTS WITH OSU

ACCOUNT NUMBER: 2-81151-240

CHARGE TO: \_\_\_\_\_

SPECIAL INSTRUCTIONS: \_\_\_\_\_

REQUESTED BY: PETE FINGERHUT

APPROVED BY: Theresa A. Bell

OFFICE USE ONLY	
Vendor #	<u>00976</u>
Invoice #	_____
Account #	<u>2-81151-240</u>
	<u>27,000-</u>
P.O. #	_____
Check #	<u>SEP - 1 2017</u>
Check Date	<u>8/31/17</u>

**INCIDENT FIFTY-THREE**  
**Defendants**  
**Date of Offense**

**Tampering with Records, §2913.42, F4**  
**Tom Staf, Pete Fingerhut**  
**On or about August 21, 2018**

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Check Request Form 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. This count pertains to a check request form which stated a false reason why the Zoo funds were being spent when the actual reason Zoo funds were being spent was for the personal entertainment purposes of the defendant(s). Within this form, the reason for the expenditure of \$50,000.00 of Zoo funds was falsified. The money was spent at the Schottenstein Center at OSU.

**INCIDENT FIFTY-FOUR**                      **Tampering with Records, §2913.42, F4**  
**Defendants**                                      Pete Fingerhut  
**Date of Offense**                              On or about March 25, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Invoice from The Ohio State University 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. This count pertains to an Invoice submitted to the Zoo by The Ohio State University in the amount of \$31,600.00 for a suite in 2017. Fingerhut altered the document by cutting and pasting different language on the document to make it appear that the Zoo was paying for advertising when in fact it was not. Zoo funds were being spent was for the personal entertainment purposes of the defendant.

**INCIDENT FIFTY-FIVE**                      **Tampering with Records, §2913.42, F5**  
**Defendants**                                      Tom Stalf  
**Date of Offense**                              On or about February 8, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Credit Card Authorization Form and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Stalf did falsify a Credit Card Authorization Form so the Zoo would pay for personal expenses of the defendant of \$4099.91.

**INCIDENT FIFTY-SIX**                      **Telecommunications Fraud, §2913.05, F3**  
**Defendants**                                      Tom Stalf, Pete Fingerhut  
**Date of Offense**                              On or about September 19, 2017

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 seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars. Within the course of hiding the fact that the zoo was paying for a suite at "The Schott," the defendants participated in an email to further conceal that fact.

**INCIDENT FIFTY-SEVEN****Telecommunications Fraud, §2913.05, F4****Defendants**

Pete Fingerhut

**Date of Offense**

On or about July 19, 2016

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 thousand dollars or more but less than seven thousand five hundred dollars. This count pertains to the defendant falsifying Zoo records so that he and his wife could attend the Ohio State vs. Oklahoma game in Norman, OK with the Buckeye Boosters. Fingerhut emailed the Boosters the Zoo Credit Card number that he possessed to pay for a package including airfare, tickets to the football game, and lodging. He then falsified a Credit Card Authorization Form belonging to the Columbus Zoo asserting that the expense was for an advertisement when in fact the funds expended were for his wife and himself to eat, drink, and attend the Ohio State vs. Oklahoma football game in Norman, OK.

**PROMO WEST**

**BOTH BEFORE AND AFTER THE BOARD OF DIRECTORS ISSUED AN ORDER THAT NO ZOO FUNDS WOULD BE PAID FOR EVENT TICKETS SUCH AS PROMOWEST FINGERHUT NEGOTIATED AND ENTERED INTO AN AGREEMENT WITH PROMOWEST FOR A SUITE AT CONCERTS. HE HAD BUSINESS 1 PAY FOR THE SUITE AND BILL THE ZOO FOR THE MONEY WHICH WAS PAID.**

**INCIDENT FIFTY-EIGHT****Telecommunications Fraud, §2913.05, F3****Defendants**

Pete Fingerhut

**Date of Offense**

On or about April 12, 2019

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 seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars. Fingerhut altered a contract with PromoWest so that it would appear to the Zoo that the Zoo was entering into an agreement with PromoWest for advertising when in fact the contract was for suites to events. Fingerhut did this after the Board of Directors of the Zoo ordered Fingerhut, Stalf and Greg Bell to divest the zoo of all suites and tickets. Fingerhut then emailed the contract back to PromoWest telling PromoWest to invoice the Zoo for Marketing and Advertising expenses when in fact the suite was for the personal enjoyment of Fingerhut and others.

**INCIDENT FIFTY-NINE Telecommunications Fraud, §2913.05, F4**

**Defendants** Pete Fingerhut  
**Date of Offense** On or about May 7, 2019

The Defendant(s) unlawfully having devised a scheme to defraud, did knowingly disseminate, transmit, or caused to disseminated or transmitted by means of wire, radio, satellite, telecommunication, telecommunications device, or telecommunication services any writing, data, sign, signal, picture, sound, 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 five thousand dollars or more but less than one hundred thousand dollars. After Fingerhut altered a contract with PromoWest disguising the true nature of the agreement he emailed a Zoo vendor (Business ) and asked the Zoo vendor to invoice the Zoo for the cost of the suite and bill the Zoo for such cost.

**INCIDENT SIXTY Tampering with Records, §2913.42, F5**

**Defendants** Pete Fingerhut  
**Date of Offense** On or about May 7, 2019

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: An Invoice and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. Fingerhut altered a contract with PromoWest so that it would appear to the Zoo that the Zoo was entering into an agreement with PromoWest for advertising when in fact the contract was for suites to events. Fingerhut did this after the Board of Directors of the Zoo ordered Fingerhut, Stalf, and Greg Bell to divest the Zoo of all suites and tickets. Fingerhut then emailed the contract back to PromoWest telling PromoWest to invoice the Zoo for Marketing and Advertising expenses when in fact the suite was for the personal enjoyment of Fingerhut and others. After Fingerhut altered a contract with PromoWest disguising the true nature of the agreement, he emailed a zoo vendor (Business 1) and asked the Zoo vendor to invoice the Zoo for the cost of the suite and bill the Zoo for such cost.

**INCIDENT SIXTY-ONE Tampering with Records, §2913.42, F5**

**Defendants** Pete Fingerhut  
**Date of Offense** On or about July 15, 2014

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Dublin Irish Festival Invoice and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. This is the Dublin Irish Festival Ticket scam wherein Fingerhut falsified or had invoices falsified to the zoo asserting that the zoo was paying for advertising at the festival when in fact no advertising occurred. Rather, Zoo money was used for Fingerhut and his family to eat, drink, carouse, and entertain themselves who had rented a tent under an alias in some

instances, the Murphy Family. Zoo expenditure here totaled \$1,400.00.

**FINGERHUT'S DUBLIN IRISH FESTIVAL SCAM; HIDING THE FACT THAT THE ZOO WAS PAYING FOR HIM TO DRINK , EAT, AND CAROUSE ALL DURING THE FESTIVAL AND THEN GETTING BUSINESS 1 TO PAY FOR IT AND PASS THE COST ON TO THE ZOO.**







**INCIDENT SIXTY-TWO**

**Defendants**

**Date of Offense**

**Tampering with Records, §2913.42, F5**

Pete Fingerhut

On or about December 4, 2015

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Dublin Irish Festival Invoice and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. This is the Dublin Irish Festival Ticket scam wherein Fingerhut falsified or had invoices falsified to the Zoo asserting that the Zoo was paying for advertising at the festival when in fact no advertising occurred. Rather, Zoo money was used for Fingerhut and his family to eat, drink, carouse, and entertain themselves who had rented a tent under an alias in some instances, the Murphy Family. This invoice totaled \$6,092.00.

**INCIDENT SIXTY-THREE**

**Defendants**

**Date of Offense**

**Tampering with Records, §2913.42, F5**

Pete Fingerhut

On or about July 18, 2016

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Dublin Irish Festival invoice and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars.. This is the Dublin Irish Festival Ticket scam wherein Fingerhut falsified or had invoices falsified to the Zoo asserting that the Zoo was paying for advertising

at the festival when in fact no advertising occurred. Rather, Zoo money was used for Fingerhut and his family to eat, drink, carouse, and entertain themselves who had rented a tent under an alias in some instances, the Murphy Family. This invoice totaled \$2,250.00.

**INCIDENT SIXTY-FOUR**                      **Tampering with Records, §2913.42, F4**  
**Defendants**                                      Pete Fingerhut  
**Date of Offense**                              On or about December 16, 2016

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Dublin Irish Festival 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. This is the Dublin Irish Festival Ticket scam wherein Fingerhut falsified or had invoices falsified to the Zoo asserting that the Zoo was paying for advertising at the festival when in fact no advertising occurred. Rather, Zoo money was used for Fingerhut and his family to eat, drink, carouse, and entertain themselves who had rented a tent under an alias in some instances, the Murphy Family. This invoice totaled \$10,910.00.

**INCIDENT SIXTY-FIVE**                      **Tampering with Records, §2913.42, F4**  
**Defendants**                                      Tom Stalf, Pete Fingerhut  
**Date of Offense**                              On or about December 11, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Dublin Irish Festival 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. This is the Dublin Irish Festival Ticket scam wherein Fingerhut falsified or had invoices falsified to the Zoo asserting that the Zoo was paying for advertising at the festival when in fact no advertising occurred. Rather, Zoo money was used for Fingerhut and his family to eat, drink, carouse, and entertain themselves who had rented a tent under an alias in some instances, the Murphy Family. This invoice totaled \$10,630.00.

**INCIDENT SIXTY-SIX**                      **Tampering with Records, §2913.42, F4**  
**Defendants**                                      Pete Fingerhut  
**Date of Offense**                              On or about December 17, 2017

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Dublin Irish Festival 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. Fingerhut changed the reason for the invoice

masking the true reason for the invoice so the Zoo would pay it. This is the Dublin Irish Festival ticket scam wherein Fingerhut falsified or had invoices falsified to the Zoo asserting that the Zoo was paying for advertising at the festival when in fact no advertising occurred. Rather, Zoo money was used for Fingerhut and his family to eat, drink, carouse, and entertain themselves who had rented a tent under an alias in some instances, the Murphy Family. This is a second invoice in the amount of \$10,630.00.

**INCIDENT SIXTY-SEVEN**

**Tampering with Records, §2913.42, F5**

**Defendants**

Pete Fingerhut

**Date of Offense**

On or about December 10, 2018

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Dublin Irish Festival invoice and the value of the data or computer software involved in the offense or the loss to the victim was one thousand dollars or more and was less than seven thousand five hundred dollars. This is the Dublin Irish Festival ticket scam wherein Fingerhut falsified or had invoices falsified to the Zoo asserting that the Zoo was paying for advertising at the festival when in fact no advertising occurred. Rather, Zoo money was used for Fingerhut and his family to eat, drink, carouse, and entertain themselves who had rented a tent under an alias in some instances, the Murphy Family. This invoice totaled \$6,000.00.

**INCIDENT SIXTY-EIGHT**

**Telecommunications Fraud, §2913.05, F4**

**Defendants**

Pete Fingerhut

**Date of Offense**

On or about July 18, 2016

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 thousand dollars or more but less than seven thousand five hundred dollars. This is the Dublin Irish Festival Ticket scam wherein Fingerhut falsified or had invoices falsified to the Zoo asserting that the Zoo was paying for advertising at the festival when in fact no advertising occurred. Rather, Zoo money was used for Fingerhut and his family to eat, drink, carouse, and entertain themselves who had rented a tent under an alias in some instances, the Murphy Family. Fingerhut emailed the city of Dublin and instructed those holding this event not to put the Zoo's name on the booth/tent the Zoo was paying for to further mask his scheme to defraud the Zoo.

**INCIDENT SIXTY-NINE Telecommunications Fraud, §2913.05, F4**

**Defendants** Pete Fingerhut

**Date of Offense** On or about December 10, 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 thousand dollars or more but less than seven thousand five hundred dollars. This is the Dublin Irish Festival Ticket scam wherein Fingerhut falsified or had invoices falsified to the Zoo asserting that the Zoo was paying for advertising at the festival when in fact no advertising occurred. Rather, Zoo money was used for Fingerhut and his family to eat, drink, carouse, and entertain themselves who had rented a tent under an alias in some instances, the Murphy Family. Fingerhut emailed an altered \$6,000.00 invoice or caused it to be emailed so the Zoo would pay for his personal expenses as described herein.

**INCIDENT SEVENTY**      **Telecommunications Fraud, §2913.05, F4**  
**Defendants**                      Pete Fingerhut  
**Date of Offense**              On or about January 13, 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 thousand dollars or more but less than seven thousand five hundred dollars. This is the Dublin Irish Festival Ticket scam wherein Fingerhut falsified or had invoices falsified to the Zoo asserting that the Zoo was paying for advertising at the festival when in fact no advertising occurred. Rather, Zoo money was used for Fingerhut and his family to eat, drink, carouse, and entertain themselves who had rented a tent under an alias in some instances, the Murphy Family. Fingerhut asked Business 1, a Zoo vendor, to email the altered invoice to the Zoo for payment of the invoice. The invoice was in the amount of \$5,400.00.

**INCIDENT SEVENTY-ONE**      **Money Laundering, §1315.55, F3**  
**Defendants**                      Pete Fingerhut  
**Date of Offense**              On or about December 10, 2018

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. This is the Dublin Irish Festival Ticket scam wherein Fingerhut falsified or had invoices falsified to the Zoo asserting that the Zoo was paying for advertising at the festival when in fact no advertising occurred. Rather, Zoo money was used for Fingerhut and his family to eat, drink, carouse, and entertain themselves who had rented a tent under an alias in some instances, the Murphy Family. In this count Fingerhut conducted or attempted to conduct a transaction involving a false invoice with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity of theft. The invoice was in the amount of \$6,000.00.

**INCIDENT SEVENTY-TWO**      **Money Laundering, §1315.55, F3**  
**Defendants**                      Pete Fingerhut  
**Date of Offense**              On or about September 29, 2017

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. The defendant did conduct or attempt to conduct a transaction, with a Credit Card Usage Form concerning money owned by the Columbus Zoo, with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit: theft.

**INCIDENT SEVENTY-THREE Money Laundering, §1315.55, F3**  
**Defendants** Tom Stalf  
**Date of Offense** On or about October 11, 2017

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. The defendant did conduct or attempt to conduct a transaction, with a Credit Card Usage form concerning money owned by the Columbus Zoo, with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit: theft.

**INCIDENT SEVENTY-FOUR Money Laundering, §1315.55, F3**  
**Defendants** Pete Fingerhut  
**Date of Offense** On or about October 23, 2017

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. The defendant did conduct or attempt to conduct a transaction, with a Credit Card Usage Form concerning money owned by the Columbus Zoo, with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit theft.

**INCIDENT SEVENTY-FIVE Money Laundering, §1315.55, F3**  
**Defendants** Pete Fingerhut  
**Date of Offense** On or about January 20, 2018

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. The defendant did conduct or attempt to conduct a transaction, with a Credit Card Usage Form concerning money owned by the Columbus Zoo, with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit theft.

**INCIDENT SEVENTY-SIX**      **Money Laundering, §1315.55, F3**  
**Defendants**                      Tom Stalf  
**Date of Offense**              On or about March 5, 2018

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. The defendant did conduct or attempt to conduct a transaction, with a Credit Card Usage form concerning money owned by the Columbus Zoo, with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit theft.

**INCIDENT SEVENTY-SEVEN**      **Money Laundering, §1315.55, F3**  
**Defendants**                      Tom Stalf, Pete Fingerhut  
**Date of Offense**              On or about June 18, 2017

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. The defendant(s) hid, disguised, or masked the theft offense, or laundering of the money, by creating invoices or paperwork with false information so that the zoo would pay for their personal spending, carousing, and eating. The defendant(s) did conduct or attempt to conduct a transaction, with a Credit Card Usage Form concerning money owned by the Columbus Zoo, with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit theft in excess of \$13,000.00.

**INCIDENT SEVENTY-EIGHT**      **Money Laundering, §1315.55, F3**  
**Defendants**                      Tom Stalf  
**Date of Offense**              On or about February 18, 2017

The defendant 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 purpose of committing or furthering the commission of corrupt activity. The defendant hid, disguised or masked the theft offense, or laundering of the money by creating invoices or paperwork with false information so that the zoo would pay for their personal spending, carousing, and eating. The defendant did conduct or attempt to conduct a transaction, with a Credit Card Usage Form concerning money owned by the Columbus Zoo, with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit theft in excess of

\$4,000.00.

**INCIDENT SEVENTY-NINE**      **Money Laundering, §1315.55, F3**  
**Defendants**                      Tom Stalf  
**Date of Offense**              On or about April 27, 2016

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. The corpus delicti was not discovered until Summer of 2021 as the defendant hid, disguised or masked the theft offense, or laundering of the money by creating invoices or paperwork with false information so that the Zoo would pay for their personal spending, carousing, and eating. The defendant did conduct or attempt to conduct a transaction, with a Credit Card Usage Form concerning money owned by the Columbus Zoo, with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit theft in excess of \$20,000.00.

**INCIDENT EIGHTY**              **Money Laundering, §1315.55, F3**  
**Defendants**                      Pete Fingerhut  
**Date of Offense**              On or about December 9, 2015

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. The defendant hid, disguised or masked the theft offense, or laundering of the money by creating invoices or paperwork with false information so that the Zoo would pay for their personal spending, carousing, and eating. The defendant did conduct or attempt to conduct a transaction, with a Credit Card Usage form concerning money owned by the Columbus Zoo, with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit theft in excess of \$2,500.00.

**INCIDENT EIGHTY-ONE**        **Money Laundering, §1315.55, F3**  
**Defendants**                      Pete Fingerhut  
**Date of Offense**              On or about June 9, 2015

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. The defendant hid, disguised or masked the theft offense, or laundering of the money by creating invoices or paperwork with false information so that the Zoo would pay for their personal spending, carousing, and eating. The defendant did conduct or attempt to conduct a transaction, with a Credit Card Usage Form concerning money owned by the Columbus Zoo, with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit theft, \$4,500.00.

**INCIDENT EIGHTY-TWO**        **Money Laundering, §1315.55, F3**  
**Defendants**                      Tom Stalf  
**Date of Offense**              On or about April 6, 2015



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. The defendant hid, disguised or masked the theft offense, or laundering of the money by creating invoices or paperwork with false information so that the zoo would pay for their personal spending, carousing, and eating. The defendant did conduct or attempt to conduct a transaction, with a credit card usage form concerning money owned by the Columbus Zoo, with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit theft, \$10,000.00.

**INCIDENT EIGHTY-THREE**      **Tampering with Records, §2913.42, F4**  
**Defendants**                      Tom Stalf, Greg Bell  
**Date of Offense**                On or about January 14, 2016

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Columbus Zoological Park Credit Card Usage Form 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.

The defendants did falsify a Columbus Zoo Credit Card Authorization Form so that the Columbus Zoo would pay for a niece of the defendant and her friends /associates to use the suite the Zoo paid for.

**INCIDENT EIGHTY-FOUR**      **Telecommunications Fraud, §2913.05, F1**  
**Defendants**                      Tom Stalf, Pete Fingerhut  
**Date of Offense**                On or about 6/9/2012 through 8/1/2021

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 million or more, contrary to the form of the statute in such cases made and provided, and against the peace and dignity of the State of Ohio.

**INCIDENT EIGHTY-FIVE**      **Bribery, §2921.02, F3**  
**Defendants**                      Tom Stalf.  
**Date of Offense**                On or about April 17, 2020

The Defendant(s) unlawfully did knowingly solicit for himself or another person any valuable thing or valuable benefit, to wit: work done on real property he owns or owned, to corrupt or improperly influence him or another public servant with respect to the discharge of his or the other public servant's duty, either before or after he was elected, appointed, qualified, employed, summoned, or sworn as a public servant or party official contrary to the form of the statute in such cases made and provided, and against the peace and dignity of the State of Ohio. This defendant being a public servant did solicit a

zoo vender Business 4 to perform work on real property Stalf owns or owned via text messages promising zoo benefits to Business 4 in return.

**INCIDENT EIGHTY-SIX**                      **Tampering with Records, §2913.42, F4**  
**Defendants**                                      Pete Fingerhut  
**Date of Offense**                              On or about September 13, 2018

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: A billing record sent from Business 1 to the zoo, 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. The defendant quarterbacked a fraud whereby after he was ordered or after the Zoo executives were ordered not to purchase any more tickets using Zoo money, Fingerhut instructed Business 1 to Pay for sporting event tickets at Nationwide Arena then to invoice the Zoo the cost of the tickets. The invoice was false.

**INCIDENT EIGHTY-SEVEN**                      **Tampering with Records, §2913.42, F4**  
**Defendants**                                      Pete Fingerhut  
**Date of Offense**                              On or about September 13, 2018

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: A billing record sent from Business 1 to the zoo, 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. The defendant quarterbacked a fraud whereby after he was ordered or after the Zoo executives were ordered not to purchase any more tickets using Zoo money, Fingerhut instructed Business 1 to Pay for sporting event tickets at Nationwide Arena then to invoice the Zoo the cost of the tickets. The invoice was false.

**INCIDENT EIGHTY-EIGHT**                      **Tampering with Records, §2913.42, F4**  
**Defendants**                                      Pete Fingerhut  
**Date of Offense**                              On or about August 3, 2018

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: A billing record sent from Business 1 to the zoo, 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. The defendant quarterbacked a fraud whereby after he was ordered or after the Zoo executives were ordered not to purchase any more tickets using Zoo money, Fingerhut instructed Business 1 to Pay for sporting event tickets at Nationwide Arena then to invoice the Zoo the cost of the tickets. The invoice was false.

**INCIDENT EIGHTY-NINE****Tampering with Records, §2913.42, F4****Defendants**

Pete Fingerhut

**Date of Offense**

On or about July 24, 2019

The Defendant(s) unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: A billing record, an invoice sent from Business 1 to the zoo, 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.

The defendant quarterbacked a fraud whereby after he was cut and pasted a false reason for an expenditure and placed it on an invoice submitted by Business 1 to the Zoo in an attempt to get the Zoo to unwittingly pay for additional sporting event tickets. The invoice was false and was in the amount of \$46,704.00.

**INCIDENT NINETY****Theft 2913.02 F1****Defendants:**

Tom Stalf, Peter Fingerhut

**Date of Offense:**

02/23/2011 to 08/01/2021

Thomas E. Stalf and Peter A. Fingerhut, on or about 2/23/2011 through 8/18/2021, in Delaware County 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, The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association, of property or services, to wit: money/assets, knowingly obtain or exert control over either the property or services beyond the express or implied consent of the owner or person authorized to give consent and the value of the property or services stolen more than one million five hundred thousand dollars or more, in violation of 2913.02(A)(2), 2913.02(B)(2) of the Ohio Revised Code, **Aggravated Theft**, a felony of the first 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*

**\*\*\*THE GRAND JURORS FURTHER FIND THAT AT LEAST ONE INCIDENT OF CORRUPT ACTIVITY IS A FELONY OF THE FIRST DEGREE. FURTHER THE GRAND JURORS FIND THAT AT LEAST ONE INCIDENT OF CORRUPT ACTIVITY IS FELONY OF THE FIRST, SECOND OR THIRD DEGREE.**

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

Thomas E. Stalf, on or about the 18th day of May, 2016 through the 3rd day of May, 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, did knowingly solicit or accept for himself for another person any valuable thing or valuable benefit, to wit: Sporting events tickets, plane transportation, an extension to a building on his real property and additional goods and services to corrupt or improperly influence him or another public servant or party official with respect to the discharge of his or the other public servant's or party official's duty, either before or after he was elected, appointed, qualified, employed, summoned, or sworn as a public servant or party official in violation of Ohio Revised Code §2921.02(B), 2921.02(E), **Bribery**, a felony of the third degree.

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

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

Peter A. Fingerhut, Thomas E. Stalf, and Gregory A. Bell, on or about the 1st day of February, 2011 through the 1st day of August, 2021, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, did, with purpose to commit or promote or facilitate the commission of Engaging in Pattern of Corrupt Activity plan or aid in planning the commission of the specified offense with another person or persons, Peter A. Fingerhut, Thomas E. Stalf, and Gregory A. Bell, to wit: to wit: did Conspire to Engage in Pattern Of Corrupt Activity by conspiring to present tampered with documents in support of use of a Zoo credit card holding out that the credit card or cards were used for a zoo purpose when the cards in fact were not used for Zoo purpose for example: Peter Fingerhut negotiated contracts with Nationwide Arena for Suite, Loge and seating tickets. Fingerhut, Stalf and Bell all used the tickets for personal use knowing that they were each putting false information on a Columbus Zoo Credit Card form, which was either approved by Bell or Stalf. The trio acted in the same manner to secure a suite at the Schottenstein Center on OSU. The trio also acted in concert to defraud the Zoo Barter system for Sporting Event Tickets, a Florida vacation and other personal uses. The trio, falsified or tampered with Zoo records, committed telecommunication fraud, theft and money laundering. More than 2.2 million dollars was stolen pursuant to this scheme and the object of the conspiracy was a felony of the first degree, in violation of Ohio Revised Code §2923.01, **Conspiracy**, a felony of the second degree.

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

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

Peter A. Fingerhut, on or about the 2nd day of May, 2023, 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 make a false statement, or knowingly swear or affirm the truth of a false statement previously made, when the statement was made with purpose to mislead a public official in performing the public official's official function in violation of Ohio Revised Code §2921.13(A)(3), 2921.13(F)(1), **Falsification**, a misdemeanor of the first 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 Eighty-Four:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut and Thomas E. Stalf, on or about the 9th day of June, 2012 through the 1st day of August, 2021, in the county of Delaware or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in Delaware County, Ohio, 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 in violation of Ohio Revised Code §2913.05(A), 2913.05(B); 2913.05(C), **Telecommunications Fraud**, a felony of the first 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 Eighty-Five:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf, on or about the 17th 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 promise, offer, or give any valuable thing or valuable benefit, to wit: work done on real property he owns or owned, with purpose to corrupt a public servant, to wit: or improperly to influence him with respect to the discharge of his duty, whether before or after he was elected, appointed, qualified, employed, summoned, or sworn in violation of Ohio Revised Code §2921.02(A), 2921.02(E), **Bribery**, a felony of the third degree.

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

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

Peter A. Fingerhut, on or about the 13th 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, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Columbus Zoo and Aquarium falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: a billing record sent from Business 1 to the zoo, 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 in violation of Ohio Revised Code §2913.42(A)(1), 2913.42(B)(3)(c), **Tampering with Records**, a felony of the fourth 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 Eighty-Seven:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about the 13th 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, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Columbus Zoo and Aquarium falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: a billing record sent from Business 1 to the zoo, 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 in violation of Ohio Revised Code §2913.42(A)(1), 2913.42(B)(3)(c), **Tampering with Records**, a felony of the fourth 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 Eighty-Eight:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about the 3rd day of August, 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, did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Columbus Zoo and Aquarium falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit:

A billing record sent from Business 1 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 in violation of Ohio Revised Code §2913.42(A)(1), 2913.42(B)(3)(c), **Tampering with Records**, a felony of the fourth 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 Eighty-Nine:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Peter A. Fingerhut, on or about the 24th day of July, 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, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Columbus Zoo and Aquarium falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: a billing record sent from Business 1 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 in violation of Ohio Revised Code §2913.42(A)(1), 2913.42(B)(3)(c), **Tampering with Records**, a felony of the fourth 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 Ninety:** *The Jurors of the Grand Jury of the State of Ohio, within and for the body of Delaware County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:*

Thomas E. Stalf and Peter A. Fingerhut, on or about 2/23/2011 through 8/18/2021, in Delaware County 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, The Columbus Zoo and Aquarium aka the Columbus Zoological Park Association, of property or services, to wit: money/assets, knowingly obtain or exert control over either the property or services beyond the express or implied consent of the owner or person authorized to give consent and the value of the property or services stolen more than one million five hundred thousand dollars or more, in violation of 2913.02(A)(2), 2913.02(B)(2) of the Ohio Revised Code, **Aggravated Theft**, a felony of the first 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.*

Dave Yost  
Ohio Attorney General  
Delaware County, Ohio




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Daniel Kasaris, 0042315  
SPECIAL PROSECUTOR  
SENIOR ASSISTANT ATTORNEY GENERAL

A TRUE BILL

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



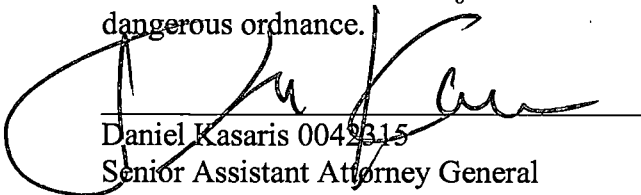
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Foreperson, Grand Jury

WHERE APPLICABLE, NOTICE IS HEREBY GIVEN:

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

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



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Daniel Kasaris 0042315  
Senior Assistant Attorney General