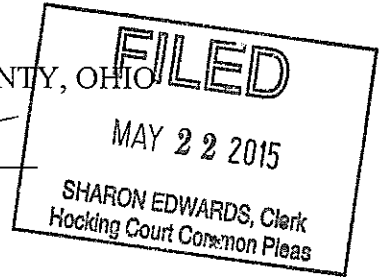


IN THE COURT OF COMMON PLEAS, HOCKING COUNTY, OHIO



IN THE STATE OF OHIO

: CASE NO. 15CR00085

SS.

HOCKING COUNTY

: INDICTMENT FOR:

STATE OF OHIO,

: COUNT I: ENGAGING IN A PATTERN OF
CORRUPT ACTIVITY [F/1]

vs.

: ORC SECTION 2923.32(A)(1)

BRANDON L. WHITE

: COUNT II: GRAND THEFT OF A MOTOR
VEHICLE – BY DECEPTION [F/4]

: ORC SECTION 2913.02(A)(3), (B)(5)

: COUNT III: GRAND THEFT OF A MOTOR
VEHICLE – BEYOND SCOPE OF CONSENT [F/4]

: ORC SECTION 2913.02(A)(2), (B)(5)

: COUNT IV: THEFT OF AN ELDERLY PERSON
– BY DECEPTION [F/4]

: ORC SECTION 2913.02(A)(3), (B)(3)

: COUNT V: THEFT OF AN ELDERLY PERSON
– BY DECEPTION [F/3]

: ORC SECTION 2913.02(A)(3), (B)(3)

: COUNT VI: THEFT BY DECEPTION [F/5]
ORC SECTION 2913.02 (A)(3)

:

: COUNT VII: THEFT BY DECEPTION [F/5]

: ORC SECTION 2913.02(A)(3)

: COUNT VIII: THEFT BY DECEPTION [F/5]
ORC SECTION 2913.02(A)(3)

:

: COUNT IX: MONEY LAUNDERING [F/3]

: ORC SECTION 1315.55(A)(1)

: COUNT X: TAMPERING WITH RECORDS
ORC SECTION 2913.42(A)(1) [F/3]

: COUNT XI: TAMPERING WITH RECORDS
ORC SECTION 2913.42(A)(1) [F/3]

:

: COUNT XII: TAMPERING WITH RECORDS

: ORC SECTION 2913.42(A)(1) [F/3]

: COUNT XIII: THEFT BY DECEPTION [F/5]
ORC SECTION 2913.02(A)(3)

:
COUNT XIV: MONEY LAUNDERING [F/3]
: ORC SECTION 1315.55(A)(1)

: COUNT XV: THEFT BY DECEPTION [F/5]
ORC SECTION 2913.02(A)(3)

Of the Second Term Part in the year of two thousand fifteen THE JURORS OF THE GRAND JURY of the State of Ohio within and for the body of the County aforesaid, on their oaths, in the name and by the authority of the State of Ohio, do find and present as follows:

that Brandon L. White

COUNT I

beginning on or about the 11th day of October, 2013 and continuing through the 11th day of December, 2013,

in a continuous course of criminal conduct occurring in Hocking County, Ohio and other counties whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, while being employed by or associated with, an enterprise (to wit: B&S Trucking and Livestock LLC, and/or Brandon's Cattle Company, and/or group of persons associated in fact),

did knowingly conduct or participate in the affairs of an enterprise through a pattern of corrupt activity, (to-wit: the criminal acts alleged in Counts II through XV of this Indictment, as if fully re-written herein; as well as other related acts of theft, including, but not limited to, a Theft By Deception committed against victim Paul Sommers on or about December 6, 2013, for which Brandon White was convicted in Mercer County, Kentucky, on April 15, 2014, in Mercer Circuit Court Case No. 14-CR-00010; with the total amount of the property involved being in excess of one thousand dollars),

in violation of Ohio Revised Code, Titled Engaging in a Pattern of Corrupt Activity, ORC Section 2923.32(A)(1), a Felony of the First Degree, and against the peace and dignity of the State of Ohio

COUNT II

on or about the 11th day of October, 2013, in Hocking County, Ohio, or another county whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, with the purpose to deprive David Jeffers, the owner, of his property, did knowingly obtain and exert control over a motor vehicle, (to-wit: 2003 Blue Dodge Ram 3500 pickup truck), by deception,

in violation of the Ohio Revised Code, Titled Grand Theft of a Motor Vehicle – By Deception, ORC Section 2913.02(A)(3), (B)(5), a Felony of the Fourth Degree, and against the peace and dignity of the State of Ohio.

COUNT III

On or between approximately the 25th day of October, 2013 and the 20th day of November, 2013, in Hocking County, Ohio, or another county whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, with the purpose to deprive David Jeffers, the owner, of his property, did knowingly obtain and exert control over a motor vehicle, (to-wit: 2003 Blue Dodge Ram 3500 pickup truck), beyond the scope of the express or implied consent of the owner,

in violation of the Ohio Revised Code, Titled Grand Theft of a Motor Vehicle – Outside Scope of Consent, ORC Section 2913.02(A)(2), (B)(5), a Felony of the Fourth Degree, and against the peace and dignity of the State of Ohio.

COUNT IV

on or about the 6th day of November, 2013, in Hocking County, Ohio, or another county whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, with the purpose to deprive James Keith Beglin, the owner, of his property, did knowingly obtain and exert control over certain property worth \$1,000.00 or more, but less than \$7500.00, (to-wit: cattle with a value of \$4,500.00), by deception, and, at the time, said victim of the offense was an elderly person who was 65 years of age or older,

in violation of the Ohio Revised Code, Titled Theft Against an Elderly Person – By Deception, ORC Section 2913.02(A)(3), (B)(3), a Felony of the Fourth Degree, and against the peace and dignity of the State of Ohio.

COUNT V

on or about the 7th day of November, 2013, in Hocking County, Ohio, or another county whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, with the purpose to deprive James Keith Beglin, the owner, of his property, did knowingly obtain and exert control over certain property worth \$7,500.00

or more, but less than \$37,500.00, (to-wit: cattle with a value of \$7,600.00), by deception, and, at the time, said victim of the offense was an elderly person who was 65 years of age or older,

in violation of the Ohio Revised Code, Titled Theft Against an Elderly Person – By Deception, ORC Section 2913.02(A)(3), (B)(3), a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

COUNT VI

on or about the 10th day of November, 2013, in Hocking County, Ohio, or another county whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, with the purpose to deprive Montie Kuhn, the owner, of his property, did knowingly obtain and exert control over certain property worth \$1,000.00 or more, but less than \$7,500.00, (to-wit: cattle with a value of \$1,700.00), by deception,

in violation of the Ohio Revised Code, Titled Theft By Deception, ORC Section 2913.02(A)(3), a Felony of the Fifth Degree, and against the peace and dignity of the State of Ohio.

COUNT VII

on or about the 11th day of November, 2013, in Hocking County, Ohio, or another county whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, with the purpose to deprive Tom Sanders, the owner, of his property, did knowingly obtain and exert control over certain property worth \$1,000.00 or more, but less than \$7,500.00, (to-wit: Cattle with a value of \$3,200.00), by deception,

in violation of the Ohio Revised Code, Titled Theft By Deception, ORC Section 2913.02(A)(3), a Felony of the Fifth Degree, and against the peace and dignity of the State of Ohio.

COUNT VIII

on or about the 13th day of November, 2013, in Hocking County, Ohio, or another county whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, with the purpose to deprive Brian Jones, the owner, of his property, did knowingly obtain and exert control over certain property worth \$1,000.00 or more, but less than \$7,500.00, (to-wit: Cattle with a value of \$6,295.00), by deception,

in violation of the Ohio Revised Code, Titled Theft By Deception, ORC Section 2913.02(A)(3), a Felony of the Fifth Degree, and against the peace and dignity of the State of Ohio.

COUNT IX

on or about the 13th day of November, 2013, in Hocking County, Ohio, or another county whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, did conduct or attempt to conduct a transaction (to-wit: a trade) knowing that the property involved in the transaction (to-wit: bottle calves) were the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity,

in violation of the Ohio Revised Code, Titled Money Laundering, ORC Section 1315.55(A)(1), a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

COUNT X

on or about the 15th day of November, 2013, in Hocking County, Ohio, or another county whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, knowing that he had no privilege to do so, and with the purpose to defraud or knowing that he was facilitating a fraud, falsified a writing, data, or record (to-wit: Bill of Sale reflecting false seller information and false VIN), which was kept by or belonged to a local, state, or federal governmental entity (to-wit: Scioto County Clerk of Courts),

in violation of the Ohio Revised Code, Titled Tampering With Records, ORC Section 2913.42(A)(1), a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

COUNT XI

on or about the 15th day of November, 2013, in Hocking County, Ohio, or another county whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, knowing that he had no privilege to do so, and with the purpose to defraud or knowing that he was facilitating a fraud,

falsified a writing, data, or record (to-wit: Affidavit for Registration falsely stating the vehicle did not have a VIN), which was kept by or belonged to a local, state, or federal governmental entity (to-wit: Ohio Department of Public Safety, Bureau of Motor Vehicles),

in violation of the Ohio Revised Code, Titled Tampering With Records, ORC Section 2913.42(A)(1), a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

COUNT XII

on or about the 15th day of November, 2013, in Hocking County, Ohio, or another county whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, knowing that he had no privilege to do so, and with the purpose to defraud or knowing that he was facilitating a fraud,

falsified a writing, data, or record (to-wit: Proof of Purchase Affidavit falsely stating the vehicle did not have a VIN), which was kept by or belonged to a local, state, or federal governmental entity (to-wit: Ohio Department of Public Safety, Bureau of Motor Vehicles),

in violation of the Ohio Revised Code, Titled Tampering With Records, ORC Section 2913.42(A)(1), a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

COUNT XIII

on or about the 3rd day of December, 2013, in Hocking County, Ohio, or another county whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, with the purpose to deprive Eagle Loan Co. of Ohio, Inc., the owner, of its property, did knowingly obtain and exert control over certain property or services worth \$1,000.00 or more, but less than \$7,500.00, (to-wit: monetary loan for \$5,328.00), by deception,

in violation of the Ohio Revised Code, Titled Theft by Deception, ORC Section 2913.02(A)(3), a Felony of the Fifth Degree, and against the peace and dignity of the State of Ohio.

COUNT XIV

on or about the 3rd day of December, 2013, in Hocking County, Ohio, or another county whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, did conduct or attempt to conduct a transaction (to-wit: a loan) knowing that the property involved in the transaction (to-wit: Trail West trailer) were the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity,

in violation of the Ohio Revised Code, Titled Money Laundering, ORC Section 1315.55(A)(1), a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

COUNT XV

on or about the 11th day of December, 2013, in Hocking County, Ohio, or another county whereby venue is properly placed in Hocking County, Ohio,

Brandon L. White, with the purpose to deprive Danny Fordyce, the owner, of his property, did knowingly obtain and exert control over certain property worth \$1,000.00 or more, but less than \$7,500.00, (to-wit: cattle with a value of \$6,150.00), by deception,

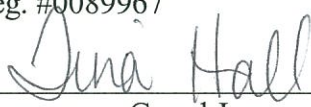
in violation of the Ohio Revised Code, Titled Theft By Deception, ORC Section 2913.02(A)(3), a Felony of the Fifth Degree, and against the peace and dignity of the State of Ohio.

A TRUE BILL

LAINA FETHEROLF
HOCKING COUNTY PROSECUTING ATTORNEY



Yukiko V. Yee
Senior Assistant Attorney General
Special Prosecutor for Hocking County
Reg. #0089967



Foreperson, Grand Jury