

THE STATE OF OHIO, MAHONING COUNTY

SECRET INDICTMENT

CASE NO. 21 CR

TRICIA FLOYD
AKA PATRICIA FLOYD
D.O.B. 4/7/1952
S.S.# 000-00-6478
2061 ATKINSON ROAD
YOUNGSTOWN, OH 44505

KYRENE RODRIGUEZ
AKA KYRENE MOIRAI RINARD FLOYD
D.O.B. 12/14/1984
S.S.# 000-00-7456
1044 LOIS COURT
YOUNGSTOWN, OH 44502

HEATHER MARIE KELLAR
FKA JAMES KELLAR
D.O.B. 11/19/1972
S.S.# 000-00-3572
533 HIGH AVENUE
NILES, OH 44446

THEODORE EDWARD DOZIER WYNN
AKA TED WYNN
D.O.B. 2/29/1992
5.5.# 000-00-2752
91 BASSETT LANE
YOUNGSTOWN, OH 44505

JUAN RODRIGUEZ
AKA JOHNNY RODRIGUEZ
D.O.B. 12/1/1988
S.S.# 000-00-8027
316 POTOMAC
YOUNGSTOWN, OH 44507

CHRISTOPHER J. GIBBONEY
D.O.B. 2/25/1992
S.S.# 000-00-4213
312 OHIO AVENUE
GIRARD, OH 44420

JESSICA GONZALEZ
D.O.B. 7/19/1969
S.S.#000-00-0008
1434 FOREST VIEW DR.
YOUNGSTOWN, OH 44505

THE STATE OF OHIO, MAHONING COUNTY

SECRET INDICTMENT

MAHONING COUNTY COMMON PLEAS COURT

SECRET INDICTMENT FOR:

TRICIA FLOYD & KYRENE RODRIGUEZ ONLY:

COUNT ONE: AGGRAVATED ARSON R.C. 2909.02(A)(2), 2909.02(B)(3) F2

TRICIA FLOYD & KYRENE RODRIGUEZ ONLY:

COUNT TWO: ARSON, R.C. 2909.03(A)(2) F4

TRICIA FLOYD & KYRENE RODRIGUEZ ONLY

COUNT THREE: AGGRAVATED THEFT R.C. 2913.02(A)(1), 2913.02(B)(2) F3

TRICIA FLOYD & KYRENE RODRIGUEZ ONLY

COUNT FOUR: INSURANCE FRAUD, R.C. 2913.47(B)(1), 2913.47(C) F3

TRICIA FLOYD ONLY:

COUNT FIVE: GRAND THEFT, R.C. 2913.02(A)(1), 2913.02(B)(2) F4

TRICIA FLOYD, HEATHER MARIE KELLAR & THEODORE EDWARD DOZIER WYNN ONLY:

COUNT SIX: INSURANCE FRAUD, R.C. 2913.47(B)(1), 2913.47(C) F4

TRICIA FLOYD, HEATHER MARIE KELLAR & THEODORE EDWARD DOZIER WYNN ONLY:

COUNT SEVEN: GRAND THEFT, R.C. 2913.02(A)(1), 2913.02(B) F3

TRICIA FLOYD, KYRENE RODRIGUEZ & HEATHER MARIE KELLAR ONLY

COUNT EIGHT: ARSON, R.C. 2909.03(A)(2) F4

TRICIA FLOYD, KYRENE RODRIGUEZ, HEATHER MARIE KELLAR & JUAN RODRIGUEZ ONLY:

COUNT NINE: AGGRAVATED ARSON R.C. 2909.02(A)(1), 2909.02(B)(2) F1

TRICIA FLOYD, KYRENE RODRIGUEZ, HEATHER MARIE KELLAR & JUAN RODRIGUEZ ONLY:

COUNT TEN: AGGRAVATED ARSON R.C. 2909.02(A)(2), 2909.02(B)(3) F2

TRICIA FLOYD, KYRENE RODRIGUEZ, HEATHER MARIE KELLAR & JUAN RODRIGUEZ ONLY:

COUNT ELEVEN: AGGRAVATED THEFT R.C. 2913.02(A)(1), 2913.02(B)(2) F3

TRICIA FLOYD, KYRENE RODRIGUEZ, HEATHER MARIE KELLAR & JUAN RODRIGUEZ ONLY:

COUNT TWELVE: AGGRAVATED THEFT R.C. 2913.02(A)(1), 2913.02(B)(2) F3

TRICIA FLOYD, KYRENE RODRIGUEZ, HEATHER MARIE KELLAR & JUAN RODRIGUEZ ONLY:

COUNT THIRTEEN: INSURANCE FRAUD, R.C. 2913.47(B)(1), 2913.47(C) F3

TRICIA FLOYD & KYRENE RODRIGUEZ ONLY:

COUNT FOURTEEN: AGGRAVATED ARSON R.C. 2909.02(A)(1), 2909.02(B)(2) F1

TRICIA FLOYD, KYRENE RODRIGUEZ & HEATHER MARIE KELLAR ONLY

COUNT FIFTEEN: AGGRAVATED ARSON R.C. 2909.02(A)(3), 2909.02(B)(2) F1

TRICIA FLOYD, KYRENE RODRIGUEZ & HEATHER MARIE KELLAR ONLY

COUNT SIXTEEN: ARSON, R.C. 2909.03(A)(2) F4

HEATHER MARIE KELLAR ONLY

COUNT SEVENTEEN: INSURANCE FRAUD, R.C. 2913.47(B)(1), 2913.47(C) F3

HEATHER MARIE KELLAR ONLY
COUNT EIGHTEEN: AGGRAVATED ARSONR.C. 2909.02(A)(2), 2909.02(B)(3) F2
HEATHER MARIE KELLAR ONLY
COUNT NINETEEN: ARSON, R.C. 2909.03(A)(2), 2909.03(B)(3) F4
HEATHER MARIE KELLAR ONLY
COUNT TWENTY: AGGRAVATED THEFTR.C. 2913.02(A)(1), 2913.02(B)(2) F3
HEATHER MARIE KELLAR ONLY
COUNT TWENTY-ONE: INSURANCE FRAUD, R.C. 2913.47(B)(1), 2913.47(C) F3
TRICIA FLOYD, HEATHER MARIE KELLAR & THEODORE EDWARD DOZIER WYNN
ONLY:
COUNT TWENTY-TWO: TAMPERING WITH RECORDS, R.C. 2913.42(A)(1), 2913.42(B)
(3)(c) F4
TRICIA FLOYD ONLY:
COUNT TWENTY-THREE: TAMPERING WITH RECORDS, R.C. 2913.42(A)(1), 2913.42
(B)(3)(d) F3
TRICIA FLOYD ONLY:
COUNT TWENTY-FOUR: TAMPERING WITH RECORDS, R.C. 2913.42(A)(1), 2913.42(B)
(3)(d) F3
TRICIA FLOYD ONLY
COUNT TWENTY-FIVE: TAMPERING WITH RECORDS, R.C. 2913.42(A)(1), 2913.42(B)
(3)(d) F3
TRICIA FLOYD, CHRISTOPHER J. GIBBONEY & JESSICA GONZALEZ ONLY
COUNT TWENTY-SIX: BURGLARY, R.C. 2911.12(A)(1), 2911.12(D) F2
TRICIA FLOYD, CHRISTOPHER J. GIBBONEY & JESSICA GONZALEZ ONLY
COUNT TWENTY-SEVEN: BURGLARY, R.C. 2911.12(A)(2), 2911.12(D) F2

COUNT TWENTY-EIGHT: ENGAGING IN A PATTERN OF CORRUPT ACTIVITY

(March Term in the year Two Thousand Twenty-One)

MAHONING COUNTY, ss.

FIRST COUNT:

THE GRAND JURORS of the County of Mahoning, in the name and by the authority of the State of Ohio, upon their oaths do find and present that: **TRICIA FLOYD AND/OR KYRENE RODRIGUEZ** on or about **2/4/2016** in the County of Mahoning, aforesaid, State of Ohio, did by means of fire or explosion knowingly cause physical harm to any occupied structure, to wit: 2061 Atkinson Road, Youngstown, Ohio in violation of Section 2909.02(A)(2), 2909.02(B)(3) of the Ohio Revised Code, a Felony of the Second Degree, and against the peace and dignity of the State of Ohio.

SECOND COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD AND/OR KYRENE RODRIGUEZ**, on or about **2/4/2016**, in the County of Mahoning, aforesaid, and State of Ohio, did by means of fire or explosion knowingly cause or create a substantial risk of physical harm to any property of Tricia Floyd, to wit: 2061 Atkinson Road, Youngstown, Ohio, with purpose to defraud, in violation of Section 2909.03(A)(2) of the Ohio Revised Code, a Felony of the Fourth Degree, and against the peace and dignity of the State of Ohio.

2061 Atkinson Road, Youngstown, Ohio. Allstate Insurance paid out \$260,236.21 to Floyd

THIRD COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD AND/OR KYRENE RODRIGUEZ**, on or about **2/4/2016**, in the County of Mahoning, aforesaid, and State of Ohio, did with purpose to deprive the owner, Allstate Insurance, of property or services, to wit: money. knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more, in violation of Section 2913.02(A)(1), 2913.02(B)(2) of the Ohio Revised Code, a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

2061 Atkinson Road, Youngstown, Ohio. Allstate Insurance paid out \$260,236.21 to Floyd as a result of her deception.

FOURTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD AND/OR KYRENE RODRIGUEZ**, on or about **2/4/2016**, in the County of Mahoning, aforesaid, and State of Ohio, did, with purpose to defraud or knowing that she was facilitating a fraud, present to, or cause to be presented to, an insurer any written or oral statement that was part of, or in support of, an application for insurance, a claim for payment pursuant to a policy, or a claim for any other benefit pursuant to a policy, knowing that the statement, or any part of the statement, was false or deceptive and the amount of the claim involved was more than one hundred fifty thousand, in violation of Section 2913.47(B)(1), 2913.47(C) of the Ohio Revised Code, a Felony of the Third Degree, and against the peace and dignity of the State of Ohio. Allstate Insurance paid out \$260,236.21 to Floyd as a result of fraud.

FIFTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD**, on or about **11/1/2016**, in the County of Mahoning, aforesaid, and State of Ohio, did with purpose to deprive the owner, U.S. Social Security Administration, of property or services, knowingly obtain or exert control over either the property or services by deception, when the property or services stolen is valued at seven thousand five hundred dollars or more in violation of Section 2913.02(A)(1), 2913.02(B)(2) of the Ohio Revised Code, a Felony of the Fourth Degree, and against the peace and dignity of the State of Ohio.

By deception Tricia Floyd received more than \$30,000.00 in social security benefits from the Social Security Administration after she received \$290,000.00 in mineral rights money and hid that fact from the Social Security Administration,

SIXTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD, HEATHER MARIE KELLAR, AND/OR THEODORE EDWARD DOZIER WYNN** on or about **2/4/2015 through 2/4/2016**, in the County of Mahoning, aforesaid, and State of Ohio, did, with purpose to defraud or knowing that the defendants was facilitating a fraud, present to, or cause to be presented to, an insurer any written or oral statement that was part of, or in support of, an application for insurance, a claim for payment pursuant to a policy, or a claim for any other benefit pursuant to a policy, knowing that the statement, or any part of the statement, was false or deceptive and the amount of the claim involved was seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars, in violation of Section 2913.47(B) (1), 2913.47(C) of the Ohio Revised Code, a Felony of the Fourth Degree, and against the peace and dignity of the State of Ohio.

Nationwide is the victim, as it had paid out in excess of \$30,000.00 to Kellar believing that a legitimate Burglary occurred at Floyd's Ashtabula County property, when in fact the Burglary was a set up for Kellar to make an insurance claim and get money. Kellar/Floyd had Wynn drive a New Holland tractor that Kellar reported stolen from Ashtabula County to 2061 Atkinson Avenue, Youngstown, Ohio so the owner, Heather/James Kellar could report it stolen and collect \$30,000.00 in insurance proceeds. The tractor was discovered by Youngstown Police/Fire and the State Fire Marshall when law enforcement investigated the arson at 2061 Atkinson Avenue, Youngstown, Ohio in February of 2016 found it.

SEVENTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD, HEATHER MARIE KELLAR, AND/OR THEODORE EDWARD DOZIER WYNN** on or about **2/24/2015 through 2/4/2016**, in the County of Mahoning, aforesaid, and State of Ohio, did with purpose to deprive the owner, Nationwide Insurance, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception when the property or services stolen is valued at seven thousand five hundred dollars or more, in violation of Section 2913.02(A) (1), 2913.02(B) of the Ohio Revised Code, a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

Nationwide is the victim, as it had paid out in excess of \$30,000.00 to Kellar believing that a legitimate Burglary occurred at Floyd's Ashtabula County property, when in fact the Burglary was set up for Kellar to make an insurance claim and get money. Kellar/Floyd had Wynn drive a New Holland tractor that Kellar reported stolen from Ashtabula County to 2061 Atkinson Avenue, Youngstown, Ohio so the owner, Heather/James Kellar could report it stolen and collection \$30,000.00 in insurance proceeds. The tractor was discovered by Youngstown Police/Fire and the State Fire Marshall when law enforcement investigated the arson at 2061 Atkinson Avenue, Youngstown, Ohio in February of 2016

EIGHTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD, KYRENE RODRIGUEZ, AND/OR HEATHER MARIE KELLAR**, on or about **7/9/2011**, in the County of Mahoning, aforesaid, and State of Ohio, did by means of fire or explosion knowingly cause or create a substantial risk of physical harm to any property of Tricia Floyd, to wit: Garage located at 2061 Atkinson Road, Youngstown, OH, with purpose to defraud, in violation of Section 2909.03(A) (2) of the Ohio Revised Code, a Felony of the Fourth Degree, and against the peace and dignity of the State of Ohio.

NINTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD, KYRENE RODRIGUEZ, HEATHER MARIE KELLAR, AND/OR JUAN RODRIGUEZ**, on or about **8/19/2015**, in the County of Mahoning, aforesaid, and State of Ohio, did by means of fire or explosion knowingly cause physical harm to any occupied structure, to wit: 2036 Atkinson Road, Youngstown, Ohio, in violation of Section 2909.02(A)(1), 2909.02(B)(2) of the Ohio Revised Code, a Felony of the First Degree, and against the peace and dignity of the State of Ohio.

The Rodriguez's purchased this property at an auction from \$5,000.00 in 2012 and did not live in it. Water records from the city of Youngstown show no water usage at least from July of 2014 to April of 2015. In May of 2015 they took out an insurance policy on the property and commenced to periodically stay in the house on the property, then in August of 2015 the house on the property burned to the ground.

TENTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD, KYRENE RODRIGUEZ, HEATHER MARIE KELLAR, AND/OR JUAN RODRIGUEZ** on or about **8/19/2015**, in the County of Mahoning, aforesaid, and State of Ohio, did by means of fire or explosion knowingly cause physical harm to any occupied structure, to wit: 2036 Atkinson Road, Youngstown, Ohio, in violation of Section 2909.02(A)(2), 2909.02(B)(3) of the Ohio Revised Code, a Felony of the Second Degree, and against the peace and dignity of the State of Ohio.

ELEVENTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD, KYRENE RODRIGUEZ, HEATHER MARIE KELLAR, AND/OR JUAN RODRIGUEZ**, on or about **8/19/2015**, in the County of Mahoning, aforesaid, and State of Ohio, did with purpose to deprive the owner, Farmers Insurance, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception when the property or services stolen is valued at one hundred fifty thousand dollars or more, in violation of Section 2913.02(A)(1), 2913.02(B)(2) of the Ohio Revised Code, a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

The Rodriguez's purchased this property at an auction from \$5,000.00 in 2012 and did not live in it. In May of 2015 they took out an insurance policy on the property and commenced to periodically stay in the house on the property, then in August of 2015 the house on the property burned to the ground. The amount of money Farmers paid out --\$336,576.99

TWELFTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD, KYRENE RODRIGUEZ, HEATHER MARIE KELLAR, AND/OR JUAN RODRIGUEZ** on or about **8/19/2015**, in the County of Mahoning, aforesaid, and State of Ohio, did with purpose to deprive the owner, Farmers Insurance, of property or services, to wit: money, knowingly obtain or exert control over either the property or services without the consent of the owner or person authorized to give consent, when the value of the property or services stolen is valued at one hundred fifty thousand dollars or more.in violation of Section 2913.02(A)(1), 2913.02(B)(2) of the Ohio Revised Code, a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

The Rodriguez's purchased this property at an auction from \$5,000.00 in 2012 and did not live in it. In May of 2015 they took out an insurance policy on the property and commenced to periodically stay in the house on the property, then in August of 2015 the house on the property burned to the ground. The amount of money Farmers paid out \$336,576.99 as a result of deception.

THIRTEENTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD, KYRENE RODRIGUEZ,**

HEATHER MARIE KELLAR, AND/OR JUAN RODRIGUEZ, on or about **8/19/2015**, in the County of Mahoning, aforesaid, and State of Ohio, did, with purpose to defraud or knowing that he was facilitating a fraud, present to, or cause to be presented to, an insurer any written or oral statement that was part of, or in support of, an application for insurance, a claim for payment pursuant to a policy, or a claim for any other benefit pursuant to a policy, knowing that the statement, or any part of the statement, was false or deceptive and the amount of the claim involved was more than one hundred fifty thousand, in violation of Section 2913.47(B)(1), 2913.47(C) of the Ohio Revised Code, a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

The Rodriguez's purchased this property at an auction from \$5,000.00 in 2012 and did not live in it. In May of 2015 they took out an insurance policy on the property and commenced to periodically stay in the house on the property, then in August of 2015 the house on the property burned to the ground. The amount of money Farmers paid out \$336,576.99 as a result of deception.

FOURTEENTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD AND/OR KYRENE RODRIGUEZ**, on or about **12/10/2012**, in the County of Mahoning, aforesaid, and State of Ohio, did by means of fire or explosion knowingly create a substantial risk of serious physical harm to any occupied structure, to wit: 2328 Carson Salt Springs Road, Warren, Ohio in violation of Section 2909.02(A)(1), 2909.02(B) (2) of the Ohio Revised Code, a Felony of the First Degree, and against the peace and dignity of the State of Ohio.

All of the Trumbull County activity occurred and is being charged by a Mahoning County Grand Jury pursuant to a conspiracy pursuant to Ohio Revised Code Section 2901.12(D), and/or as part of a course of conduct committing offenses in different jurisdictions or counties pursuant to Ohio Revised Code Section 2901.12 (H). The course of conduct includes Aggravated Arson, Arson, Insurance Fraud and other criminal conduct. As it relates to this fire a person was solicited and paid to set this fire. Kyrene Rodriguez was paid by Kellar by Kellar providing Rodriguez with a Chevrolet Impala and other consideration, in consideration for setting fire to the house located at this address. While the house was being rebuilt a second fire was set burning the house down. This is the first fire at this address

FIFTEENTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD, KYRENE RODRIGUEZ, AND/OR HEATHER MARIE KELLAR**, on or about **12/10/2012**, in the County of Trumbull, aforesaid, and State of Ohio, did by means of fire or explosion knowingly create, through the offer or acceptance of an agreement for hire or other consideration, a substantial risk of physical harm to any occupied structure, through the offer or the acceptance of an agreement for hire or other consideration to property of Heather Kellar, to wit: 2328 Carson Salt Springs Road, Warren, Ohio, in violation of Section 2909.02(A)(3), 2909.02(B)(2) of the Ohio Revised Code, a Felony of the First Degree, and against the peace and dignity of the State of Ohio.

All of the Trumbull County activity occurred and is being charged by a Mahoning County Grand Jury pursuant to a conspiracy pursuant to Ohio Revised Code Section 2901.12(D), and/or as part of a course of conduct committing offenses in different jurisdictions or counties pursuant to Ohio Revised Code Section 2901.12 (H). The course of conduct includes Aggravated Arson, Arson, Insurance Fraud and other criminal conduct. As it relates to this fire a person was solicited and paid to set this fire. Kyrene Rodriguez was paid by Kellar by Kellar providing Rodriguez with a Chevrolet Impala and other consideration, in consideration for setting fire to the house located at this address. While the house was being rebuilt a second fire was set burning the house down. This is the first fire at this address.

SIXTEENTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD, KYRENE RODRIGUEZ, AND/OR HEATHER MARIE KELLAR**, on or about 12/10/2012, in the County of Trumbull, aforesaid, and State of Ohio, did by means of fire or explosion knowingly cause or create a substantial risk of physical harm to any property of Heather Kellar, to wit: 2328 Carson Springs Road, Warren, Ohio, with purpose to defraud, in violation of Section 2909.03(A)(2) of the Ohio Revised Code, a Felony of the Fourth Degree, and against the peace and dignity of the State of Ohio.

All of the Trumbull County activity occurred and is being charged by a Mahoning County Grand Jury pursuant to a conspiracy pursuant to Ohio Revised Code Section 2901.12(D), and/or as part of a course of conduct committing offenses in different jurisdictions or counties pursuant to Ohio Revised Code Section 2901.12 (H). The course of conduct includes Aggravated Arson, Arson, Insurance Fraud and other criminal conduct. As it relates to this fire a person was solicited and paid to set this fire. Kyrene Rodriguez was paid by Kellar by Kellar providing Rodriguez with a Chevrolet Impala and other consideration, in consideration for setting fire to the house located at this address. While the house was being rebuilt a second fire was set burning the house down. This is the first fire at this address. The payout from State Farm was \$264,480.33.

SEVENTEENTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that **HEATHER MARIE KELLAR**, on or about 12/10/2012, in the County of Trumbull, aforesaid, and State of Ohio, did, with purpose to defraud or knowing that she was facilitating a fraud, present to, or cause to be presented to, an insurer any written or oral statement that was part of, or in support of, an application for insurance, a claim for payment pursuant to a policy, or a claim for any other benefit pursuant to a policy, knowing that the statement, or any part of the statement, was false or deceptive and the amount of the claim involved was more than one hundred fifty thousand in violation of Section 2913.47(B)(1), 2913.47(C) of the Ohio Revised Code, a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

All of the Trumbull County activity occurred and is being charged by a Mahoning County Grand Jury pursuant to a conspiracy pursuant to Ohio Revised Code Section 2901.12(D), and/or as part of a course of conduct committing offenses in different jurisdictions or counties pursuant to Ohio Revised Code Section 2901.12 (H). The course of conduct includes Aggravated Arson, Arson, Insurance Fraud and other criminal conduct. As it relates to this fire a person was

solicited and paid to set this fire. Kyrene Rodriguez was paid by Kellar by Kellar providing Rodriguez with a Chevrolet Impala and other consideration, in consideration for setting fire to the house located at this address. While the house was being rebuilt a second fire was set burning the house down. This is the first fire at this address. The payout from State Farm was \$264,480.33. Corpus Delicti of the crime not discovered until after July of 2016.

EIGHTEENTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **HEATHER MARIE KELLAR**, on or about **1/23/2014**, in the County of Trumbull, aforesaid, and State of Ohio, did by means of fire or explosion knowingly cause physical harm to any occupied structure, to wit: 2328 Carson Salt Springs Road, Warren, Ohio, in violation of Section 2909.02(A)(2), 2909.02(B)(3) of the Ohio Revised Code, a Felony of the Second Degree, and against the peace and dignity of the State of Ohio.

All of the Trumbull County activity occurred and is being charged by a Mahoning County Grand Jury pursuant to a conspiracy pursuant to Ohio Revised Code Section 2901.12(D), and/or as part of a course of conduct committing offenses in different jurisdictions or counties pursuant to Ohio Revised Code Section 2901.12 (H). The course of conduct includes Aggravated Arson, Arson, Insurance Fraud and other criminal conduct. While the house was being rebuilt a second fire was set burning the house down. This is the second fire at this address. The payout from State Farm was \$282,794.60.

NINETEENTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that **HEATHER MARIE KELLAR**, on or about **1/23/2014**, in the County of Trumbull, aforesaid, and State of Ohio, did by means of fire or explosion knowingly cause or create a substantial risk of physical harm to any occupied structure, to wit: 2328 Carson Salt Springs Road, with purpose to defraud, in violation of Section 2909.03(A)(2), 2909.03(B)(3) of the Ohio Revised Code, a Felony of the Fourth Degree, and against the peace and dignity of the State of Ohio.

All of the Trumbull County activity occurred and is being charged by a Mahoning County Grand Jury pursuant to a conspiracy pursuant to Ohio Revised Code Section 2901.12(D), and/or as part of a course of conduct committing offenses in different jurisdictions or counties pursuant to Ohio Revised Code Section 2901.12 (H). The course of conduct includes Aggravated Arson, Arson, Insurance Fraud and other criminal conduct. While the house was being rebuilt a second fire was set burning the house down. This is the second fire at this address. The payout from State Farm was \$282,794.60 as a result of fraud.

TWENTIETH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **HEATHER MARIE KELLAR**, on or about **1/23/2014**, in the County of Trumbull, aforesaid, and State of Ohio, did with purpose to deprive the owner, State Farm Insurance, of property or services, to wit: money, knowingly obtain or exert control

over either the property or services without the consent of the owner or person authorized to give consent when the property or services stolen is valued at one hundred fifty thousand dollars or more and less than seven hundred fifty thousand dollars., in violation of Section 2913.02(A)(1), 2913.02(B)(2) of the Ohio Revised Code, a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

All of the Trumbull County activity occurred and is being charged by a Mahoning County Grand Jury pursuant to a conspiracy pursuant to Ohio Revised Code Section 2901.12(D), and/or as part of a course of conduct committing offenses in different jurisdictions or counties pursuant to Ohio Revised Code Section 2901.12 (H). The course of conduct includes Aggravated Arson, Arson, Insurance Fraud and other criminal conduct. While the house was being rebuilt a second fire was set burning the house down. This is the second fire at this address. The payout from State Farm was \$282,794.60 as a result of fraud.

TWENTY-FIRST COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **HEATHER MARIE KELLAR**, on or about 1/23/2014, in the County of Trumbull, aforesaid, and State of Ohio, did, with purpose to defraud or knowing that she was facilitating a fraud, present to, or cause to be presented to, an insurer any written or oral statement that was part of, or in support of, an application for insurance, a claim for payment pursuant to a policy, or a claim for any other benefit pursuant to a policy, knowing that the statement, or any part of the statement, was false or deceptive and the amount of the claim involved was more than one hundred fifty thousand in violation of Section 2913.47(B)(1), 2913.47(C) of the Ohio Revised Code, a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

All of the Trumbull County activity occurred and is being charged by a Mahoning County Grand Jury pursuant to a conspiracy pursuant to Ohio Revised Code Section 2901.12(D), and/or as part of a course of conduct committing offenses in different jurisdictions or counties pursuant to Ohio Revised Code Section 2901.12 (H). The course of conduct includes Aggravated Arson, Arson, Insurance Fraud and other criminal conduct. While the house was being rebuilt a second fire was set burning the house down. This is the second fire at this address. The payout from State Farm was \$\$282,794.60 as a result of fraud. The Corpus Delicti of crime not discovered until after July of 2016.

TWENTY-SECOND COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD, HEATHER MARIE KELLAR, AND/OR THEODORE EDWARD DOZIER WYNN** on or about 2/24/2015, in the County of Mahoning, County of Ashtabula or the County of Trumbull and State of Ohio, did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on Nationwide Insurance falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Insurance Claim Application 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 Section 2913.42(A)(1), 2913.42(B)(3)(c) of the Ohio Revised Code, a Felony of the Fourth Degree, and against the peace and dignity of the State of Ohio.

This count relates to the fake burglary in Ashtabula County, reported by Kellar involving the New Holland described in this indictment.

TWENTY-THIRD COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD**, on or about **2/4/2016**, in the County of Mahoning, aforesaid, and State of Ohio, did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on Allstate Insurance Company falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Insurance Claim Application and the value of the data or computer software involved in the offense or the loss to the victim was one hundred fifty thousand dollars or more and/or the offense was committed for the purpose of devising or executing a scheme to defraud or to obtain property or services and the value of the property or services or the loss to the victim was seven thousand five hundred dollars or more, in violation of Section 2913.42(A)(1), 2913.42(B)(3)(d) of the Ohio Revised Code, a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

Floyd participated in burning her house down which was located at 2061 Atkinson Road, Youngstown, Ohio. The fire was ruled an arson by arson investigators as there were 4 locations within the house where accelerant was discovered. Floyd made an application for insurance coverage and monies which was granted, receiving in excess of \$250,000.00 asserting that she was not involved in setting the fire.

TWENTY-FOURTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD**, on or about **3/1/2012 through 10/1/2016**, in the County of Mahoning, aforesaid, and State of Ohio, did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on U.S. Social Security Administration falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Social Security Paperwork and the writing, data, computer software, or records was kept by or belonged to a local, state, or federal governmental entity, in violation of Section 2913.42(A)(1), 2913.42(B)(3)(d) of the Ohio Revised Code, a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

Floyd received \$290,000.00 for mineral rights on property she owned in Youngstown, Ohio then falsified Social Security records so that she could continue to receive social security benefits.

TWENTY-FIFTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD**, on or about **1/1/2015 through 10/1/2016**, in the County of Mahoning, aforesaid, and State of Ohio, did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on U.S. Social Security Administration falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Social Security records and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity.

Floyd received \$290,000.00 for mineral rights on property she owned in Youngstown, Ohio then falsified Social Security records so that she could continue to receive social security benefits, in violation of Section 2913.42(A)(1), 2913.42(B)(3)(d) of the Ohio Revised Code, a Felony of the Third Degree, and against the peace and dignity of the State of Ohio.

TWENTY-SIXTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD, CHRISTOPHER J. GIBBONEY, AND/OR JESSICA GONZALEZ** on or about **5/9/2013**, in the County of Mahoning, aforesaid, and State of Ohio, did, by force, stealth, or deception, trespass in an occupied structure or in a separately secured or separately occupied portion of an occupied structure, when another person, not the accomplice of the offender, was present, with purpose to commit in the structure or in the separately secured or separately occupied portion of the structure any criminal offense, to wit: the house located at 1105 Garland Avenue, Youngstown, Ohio and the offense of Theft, Section 2911.12(A)(2), in violation of Section 2911.12(A)(1), 2911.12(D) of the Ohio Revised Code, a Felony of the Second Degree, and against the peace and dignity of the State of Ohio.

Floyd orchestrated the break in, into her son's home with Gibboney, Gonzalez and a John Doe executing the plan. Once inside evidence of the Arson's, insurance fraud and other crimes was taken in addition to other property belonging to the property owner or occupant. Gonzalez admitted to the burglary in a recorded conversation.

TWENTY-SEVENTH COUNT:

AND the grand jurors of this County, in the name and by the authority of the State of Ohio, upon their oaths, do find and present that: **TRICIA FLOYD, CHRISTOPHER J. GIBBONEY, AND/OR JESSICA GONZALEZ**, on or about **5/9/2013**, in the County of Mahoning, aforesaid, and State of Ohio, did, by force, stealth, or deception, trespass in an occupied structure or in a separately secured or separately occupied portion of an occupied structure that is a permanent or temporary habitation of any person when any other person, not the accomplice of the offender was present or likely to be present, with purpose to commit in the habitation any criminal offense, to wit: the house located a 1105 Garland Avenue, Youngstown, Ohio and the offense of Theft, in violation of Section 2911.12(A)(3), 2911.12(D) of the Ohio Revised Code, a Felony of the Second Degree, and against the peace and dignity of the State of Ohio.

Floyd orchestrated the break in, into her son's home with Gibboney, Gonzalez and a John Doe executing the plan. Once inside evidence of the Arson's, insurance fraud and other crimes was taken in addition to other property belonging to the property owner or occupant. Gonzalez admitted to the burglary in a recorded conversation.

TWENTY-EIGHTH COUNT:

THE JURORS OF THE GRAND JURY of the State of Ohio on their oaths, in the name and by the authority of the State of Ohio, do find and present that in Mahoning, Trumbull and Ashtabula counties that on or about the 01/01/2012 THROUGH 11/01/2016 , TRICIA FLOYD, KYRENE RODRIGUEZ, HEATHER MARIE KELLAR, JUAN RODRIGUEZ, JESSICA GOLZALEZ while employed by, associated with any enterprise did conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity.

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 James NKA Heather Kellar (Patricia aka Tricia Floyd, Kyrene Rodriguez, Juan aka Johnny Rodriguez, Theodore aka Ted Wynn, Christopher Gibboney, Jessica Rodrigues, John Doe 1, Jane Doe 1, and other unknown individuals. The enterprise conducted activity in Mahoning, Trumbull and Ashtabula Counties.

This Enterprise existed as an "Association in Fact Enterprise" under Ohio Revised Code 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. A more detailed description of the Enterprise is stated in below.

THE PARTIES

Patricia aka Tricia Floyd is the leader of the organization whose purpose is to defraud insurance companies into paying out large sums of cash, or to obtain money by other fraudulent means. Floyd resided at 2061 Atkinson Rd Youngstown, Ohio. She has owned several properties which had fires destroy structures on those properties on Atkinson Rd and in the Buffalo, New York area. Floyd's property is a farm having use the property as a farm as well as a commercial Halloween business.

James NKA Heather Kellar is a Trumbull County resident at the time the enterprise was in existence also owning real estate and a house that sat thereon, in Ashtabula County, Ohio. Kellar met Floyd at a "Pow Wow" at 2061 Atkinson Rd where Ted Wynn was a dancer. Kellar and Floyd together plotted and devised ways to steal money from insurance companies.

Kyrene Rodriguez is a daughter of Tricia Floyd. She participated in the burning of Kellar's house located on Carson Salt Springs Road, the first fire, when John Doe refused an offer made to him by Floyd and/or Kellar to burn the house. Rodriguez also played roles in a garage fire located at 2061 Atkinson Rd, Youngstown, Ohio, the house fire located at 2061 Atkinson Rd Youngstown and the fire at property she had her husband owned at 2036 Atkinson Rd Youngstown, Ohio.

Juan aka Johnny Rodriguez is or was the husband of Kyrene Rodriguez. He assisted in running a counterfeit money operation with Kellar and was involved in the planning of the fire that occurred at the real estate he owned with Kyrene Rodriguez.

Theodore aka Ted Wynn was a dancer at a "Pow Wow" that occurred on Floyd's property when Floyd met Kellar. Wynn agreed to drive a new, New Holland tractor from Kellar's property in Ashtabula County in February of 2015 so that Kellar could report the tractor stolen and collect insurance proceeds. Wynn drove the property as agreed straight to Floyd's property located at 2061 Atkinson Rd Youngstown where a tarp was placed over it. It was discovered when the arson occurred at that address, by Youngtown Police/Fire officers who responded to the scene after the fire to investigate the fire.

Jessica Gonzalez is an associate of Floyd's who has been with Floyd when fire occurs, she and others acting with the help or assistance or at the request of Floyd burglarized the home located at 1105 Garland Ave. It is believed the motive for the burglary was to find evidence implicating this gang in criminal conduct and to seize or destroy such evidence

John Doe has knowledge of the Fraud operation of the "Floyd Gang" and was solicited by Floyd to burn Kellar's house down but refused.

Jane Doe has knowledge of the Fraud operation of the "Floyd Gang" and was aware of what Floyd was doing.

B. THE SCHEME OR PHASES OF THE ENTERPRISE'S EXISTENCE

Within the scope of this enterprise and to further its affairs, Patricia aka Tricia Floyd devised various schemes to fraudulently receive money

Within the scope of this enterprise and to further its affairs, Patricia aka Tricia Floyd enlisted the services of her daughter Kyrene Rodriguez to assist her in fraudulent schemes

Within the scope of this enterprise and to further its affairs, Patricia aka Tricia Floyd enlisted Jane Doe 2 to assist her in fraudulent schemes

Within the scope of this enterprise and to further its affairs, Patricia aka Tricia Floyd discussed her fraudulent schemes with John Doe 1 and Jane Doe 1.

Within the scope of this enterprise and to Wither its affairs, Patricia aka Tricia Floyd enlisted Heather FNA James Kellar to participate in fraudulent schemes.

Within the scope of this enterprise and to further its affairs Floyd devised a scheme to defraud the U.S. Social Security Administration of moneys so that she could receive, spend and or use \$290,000.00 in mineral rights on land that she owned.

Within the scope of this enterprise and to further its affairs Floyd and Kellar devised a way to burn house down and collect insurance proceeds after claiming a loss to a particular insurance company.

Within the scope of this enterprise and to further its affairs Floyd, Kellar successfully burned down several structures in Mahoning and Trumbull County and collected over \$1,000,000.00 in insurance proceeds from several different insurance companies

Within the scope of this enterprise and to further its affairs Floyd, Kellar devised a method to stage a burglary at a house Kellar owned in Williamsfield Township in Ashtabula County, Ohio and to report items as stolen so that Kellar could receive money, when in fact the items were not stolen

Within the scope of this enterprise and to further its affairs Kellar and Floyd enlisted Winn to drive a New Holland tractor in February of 2015 from Kellar Williamsfield Township real estate to 2061 Atkinson Rd, Youngstown, Ohio so Floyd could store or use the New Holland tractor. Meanwhile, Kellar reported the tractor as stolen receive in excess of \$30,000.00 from an insurance company.

Within the scope of this enterprise and to further its affairs Heather FNA James Kellar and Juan aka Johnny Rodriguez and others devised a way to counterfeit money changing \$1.00 bills to \$20.00 bills, \$50.00 bills and \$100.00 bills.

Within the scope of this enterprise and to further its affairs this counterfeit money was passed at Burger King, bars, restaurants and other similar businesses in Mahoning and Trumbull County, thereby converting the counterfeit cash into non-counterfeit cash.

Within the scope of this enterprise and to further its affairs member devised additional ways to frequently receive monies through insurance scams, by making false police reports, creating automobile crashes that were disguised as accidents and fires which were disguised as accidental fire when in reality the fire was deliberately set.

Within the Scope of this enterprise and to further is affairs Floyd, Kellar and other members tampered with insurance company records by making materially false statements in such records to obtain money.

Within the Scope of this enterprise and to further is affairs Floyd tampered with social security records so that she could continue to receive social security benefits.

Within the Scope of this enterprise and to further its affairs, Jessica Gonzalez, Floyd and others participated in the burglary of the home locate at 1105 Garland Ave. It is believed the motive for the burglary was to find evidence implicating this gang in criminal conduct and to seize or destroy such evidence.

Within the scope of this enterprise and to further its affairs, Kellar, Juan Rodriguez and others created counterfeit U.S. Currency and passed it in the Mahoning, Trumbull County area.

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. This is a criminal enterprise which lasted from 2011 to 2017. The common purpose of the Enterprise regarding its ongoing illegal conduct was to create sources of money for Tricia Floyd, her family a friend Heather fka James Kellar through Arson, Insurance Fraud, Counterfeiting money, theft, money laundering and social security fraud securing well over a million (\$1,000,000.00) fraudulently.

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 acted in a structured and organized manner to enable the overall organization to successfully complete these schemes and to engage in a pattern of corrupt activity. Likewise, this occurred with the knowledge and/or support of other persons associated with the Enterprise so 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, with various roles that were different, and with methods that changed in order to accomplish the main purpose of the Enterprise.

This Criminal Enterprise is about providing money to its members. The structure of the organization, as an Enterprise in fact, is as follows: Patricia aka Tricia Floyd is the leader/head of this enterprise devised with members ways to defraud insurance companies out of money to benefit the group and themselves. The function of the enterprise was to make money. Money was made through any number of fraudulent reports, manufactured incidents, and schemes.

D. AFFAIRS OF THE ENTERPRISE

The affairs of the Enterprise involve the jurisdiction of the State of Ohio and took place in Trumbull County and include but are not limited to:

1. **TAMPERING WITH RECORDS**, R.C. SECTION 2903.42: (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 when the writing, data, computer software, or record is kept by or belongs to a local, state, or federal governmental entity.
2. **THEFT**, R.C. 2913.02(A)(3): did, with purpose to deprive the owner, knowingly obtain or exert control over either the property or services by deception when the amount involved exceeded \$7,500.00
3. **MONEY LAUNDERING**: 1315.55 (A)(3): 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.
4. **AGGRAVATED ARSON** 2909.02, 2909.02(B)(3) did by means of fire or explosion knowingly cause physical harm to any occupied structure.
5. **ARSON**, 2909.03 unlawfully did by means of fire or explosion knowingly cause or create a substantial risk of physical harm to any property.
6. **INSURANCE FRAUD** 2913.47 unlawfully did, with purpose to defraud or knowing that he was facilitating a fraud, present to, or cause to be presented to, an insurer any written or oral statement that was part of, or in support of, an application for insurance, a claim for payment pursuant to a policy, or a claim for any other benefit pursuant to a policy, knowing that the statement, or any part of the statement, was false or deceptive and the amount of the claim involved was more than one hundred fifty thousand.

7. **AGGRAVATED ARSON, 2909.02(a)(3)** unlawfully did by means of fire or explosion knowingly create, through the offer or acceptance of an agreement for hire or other consideration, a substantial risk of physical harm to any occupied structure,

8. **ARSON, 2909.03(a)(2)** unlawfully did by means of fire or explosion knowingly cause or create a substantial risk of physical harm to any property with purpose to defraud.

9. **BURGLARY, 2911.12 (A)(3)** did by force, stealth, or deception Trespass in an occupied structure or in a separately secured or separately occupied portion of an occupied structure, with purpose to commit in the structure or separately secured or separately occupied portion of the structure any criminal offense, to wit, the house located at 1105 Garland Ave Youngstown, Ohio

10. **FORGERY, 2913.31 (A)(1)** did, with purpose to defraud, or knowing that the person is facilitating a fraud, shall forge any writing of another without the other person's authority.

11. **FORGERY, 2913.31 (A)(3)** did with purpose to defraud, or knowing that the person is facilitating a fraud, Utter, or possess with purpose to utter, any writing that the person knows to have been forged.

E. THE PATTERN OF CORRUPT ACTIVITY FROM JANUARY 1992 TO JANUARY 2016

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. **TAMPERING WITH RECORDS, R.C. SECTION 2903.42:** (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 when the writing, data, computer software, or record is kept by or belongs to a local, state, or federal governmental entity.

2. **THEFT, R.C. 2913.02(A)(3):** did, with purpose to deprive the owner, knowingly obtain or exert control over either the property or services by deception when the amount involved exceeded \$7,500.00

3. **MONEY LAUNDERING: 1315.55 (A)(3):** 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.

4. **AGGRAVATED ARSON 2909.02, 2909.02(B)(3)** did by means of fire or explosion knowingly cause physical harm to any occupied structure.

5. **ARSON, 2909.03** unlawfully did by means of fire or explosion knowingly cause or create a substantial risk of physical harm to any property.

6. **INSURANCE FRAUD 2913.47** unlawfully did, with purpose to defraud or knowing that he was

facilitating a fraud, present to, or cause to be presented to, an insurer any written or oral statement that was part of, or in support of, an application for insurance, a claim for payment pursuant to a policy, or a claim for any other benefit pursuant to a policy, knowing that the statement, or any part of the statement, was false or deceptive and the amount of the claim involved was more than one hundred fifty thousand.

7. **AGGRAVATED ARSON, 2909.02(a)(3)** unlawfully did by means of fire or explosion knowingly create, through the offer or acceptance of an agreement for hire or other consideration, a substantial risk of physical harm to any occupied structure,

8. **ARSON, 2909.03(a)(2)** unlawfully did by means of fire or explosion knowingly cause or create a substantial risk of physical harm to any property with purpose to defraud.

9. **BURGLARY, 2911.12 (A)(3)** did by force, stealth, or deception Trespass in an occupied structure or in a separately secured or separately occupied portion of an occupied structure, with purpose to commit in the structure or separately secured or separately occupied portion of the structure any criminal offense, to wit, the house located at 1105 Garland Ave Youngstown, Ohio

10. **FORGERY, 2913.31 (A)(1)** did, with purpose to defraud, or knowing that the person is facilitating a fraud, shall forge any writing of another without the other person's authority.

11. **FORGERY, 2913.31 (A)(3)** did with purpose to defraud, or knowing that the person is facilitating a fraud, Utter, or possess with purpose to utter, any writing that the person knows to have been forged.

F. INCIDENTS OF CORRUPT ACTIVITY

The Grand Jurors find that at least two incidents of corrupt activity occurred involving Patricia aka Tricia Floyd, and others listed in this count as such is defined by Ohio Law. The grand jurors find that these incidents of corrupt activity include but are not limited to the following conduct occurring on the following dates in the counties of Mahoning, Ashtabula and Trumbull in the State of Ohio:

Incident One: Aggravated Arson, §2909.02, F2
Defendants: Tricia Floyd, Kyrene Rodriguez
Date of Offense: On or about February 4, 2016

Tricia Floyd, Kyrene Rodriguez in violation of 2909.02(A)(2), 2909.02(B)(3) of the Ohio Revised Code, did by means of fire or explosion knowingly cause physical harm to any occupied structure, to wit: 2061 Atkinson Rd Youngstown, Ohio. Floyd and Rodriguez set fire and or were involved in the plan to set fire to the house located at 2061 Atkinson Rd Youngstown, Mahoning County, Ohio. Floyd was seen the day of the fire loading clothing and belongings into her van and moving personal property and clothing into her garage.

Incident Two Arson, §2909.03, F4
Defendants Tricia Floyd, Kyrene Rodriguez
Date of Offense On or about February 4, 2016

The Defendant(s) unlawfully did by means of fire or explosion knowingly cause or create a substantial risk of physical harm to any property of Tricia Floyd, to wit: 2061 Atkinson Rd Youngstown, Ohio, with purpose to defraud. Intending to receive insurance money from a fire, the Defendants set fire and or were

involved in the plan to set fire to the house located at 2061 Atkinson Rd. Youngstown, Ohio. Allstate Insurance paid out \$260,236.21 to Floyd. Floyd was seen the day of the fire loading clothing and belongings into her van and moving personal property and clothing into her garage.

Incident Three **Aggravated Theft, §2913.02, F3**
Defendants Tricia Floyd, Kyrene Rodriquez
Date of Offense On or about February 4, 2016

The defendants unlawfully did with purpose to deprive the owner, Allstate Insurance, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more. Intending to receive insurance money from a fire, the Defendants set fire and or were involved in the plan to set fire to the house located at 2061 Atkinson Rd. Youngstown, Ohio. Upon deceiving Allstate as to who the arsonist was, Allstate Insurance paid out \$260,236.21 to Floyd. Floyd was seen the day of the fire loading clothing and belongings into her van and moving personal property and clothing into her garage

Incident Four **Insurance Fraud, §2913.47, F3**
Defendants Tricia Floyd, Kyrene Rodriquez
Date of Offense On or about February 4, 2016

The defendants did, with purpose to defraud or knowing that he was facilitating a fraud, present to, or cause to be presented to, an insurer any written or oral statement that was part of, or in support of, an application for insurance, a claim for payment pursuant to a policy, or a claim for any other benefit pursuant to a policy, knowing that the statement, or any part of the statement, was false or deceptive and the amount of the claim involved was more than one hundred fifty thousand. Intending to receive insurance money from a fire, the Defendants set fire and or were involved in the plan to set fire to the house located at 2061 Atkinson Rd. Youngstown, Ohio.

Upon deceiving Allstate as to who the arsonist was, Allstate Insurance paid out \$260,236.21 to Floyd. Floyd was seen the day of the fire loading clothing and belongings into her van and moving personal property and clothing into her garage. Allstate Insurance paid out \$260,236.21 to Floyd.

Incident Five **Grand Theft, §2913.02, F4**
Defendants Tricia Floyd
Date of Offense On or about November 1, 2016

The defendant, unlawfully did with purpose to deprive the owner, U.S. Social Security Administration, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more.

The defendant owned 60 acres of land on Atkinson Rd in Youngstown, Mahoning County, Ohio. The defendant was on SSI. Her income is limited to \$2,000.00 per month. While she was on SSI she began to negotiate a mineral rights lease with a driller. Recognizing that she was going to receive a substantial sum of money the defendant formed a corporation, listed her son on the corporation. The defendant negotiated the lease with a driller and negotiated a payment to herself in the amount of \$290,000.00 When she received \$290,000.00, the money was placed into a bank account in the name of the corporation or company in an attempt to deceive the Social Security Administration as to the true owner of the money, and the land. The money was spent on equipment for the farm located at 2061 Atkinson, trips to Florida,

Disney, cars, and other items. In the fall of 2016 the Social Security Administration became aware of the defendant's deceit and kick her off of SSI. In the mean time she had received over \$30,000.00 unlawfully due to her deception, in Social Security benefits.

Incident Six: Insurance Fraud, §2913.47, F4
Defendants: Tricia Floyd, Heather Kellar, Theodore Edward Dozier Wynn
Date of Offense: On or about 2/4/2015 through 2/4/2016

The defendants unlawfully did, with purpose to defraud or knowing that the Defendants was facilitating a fraud, present to, or cause to be presented to, an insurer any written or oral statement that was part of, or in support of, an application for insurance, a claim for payment pursuant to a policy, or a claim for any other benefit pursuant to a policy, knowing that the statement, or any part of the statement, was false or deceptive and the amount of the claim involved was seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

Nationwide is the victim, as it had paid out in excess of \$30,000.00 to Kellar believing that a legitimate Burglary occurred at Floyd's Ashtabula County property, when in fact the Burglary was a set up for Kellar to make an insurance claim and get money. Kellar/Floyd had Wynn drive a New Holland tractor that Kellar reported stolen from Ashtabula County to 2061 Atkinson Ave. Youngstown, Ohio so the owner, Heather/James Kellar could report it stolen and collect in excess of \$30,000.00 in insurance proceeds. The tractor was discovered by Youngstown Police/Fire and the State Fire Marshall when law enforcement investigated the arson at 2061 Atkinson Ave. Youngstown, Ohio in February of 2016. This crime was hidden until the fire in February of 2016 at 2061 Atkinson Rd. Youngstown, Ohio. This crime was committed in Ashtabula, Trumbull and Mahoning County.

Incident Seven: Grand Theft, §2913.02, F4
Defendants: Tricia Floyd, Heather Kellar, Theodore Edward Dozier Wynn
Date of Offense: On or about 2/24/2015 through 2/4/2016

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

Nationwide is the victim, as it had paid out in excess of \$30,000.00 to Kellar believing that a legitimate Burglary occurred at Floyd's Ashtabula County property, when in fact the Burglary was a set up for Kellar to make an insurance claim and get money. Kellar/Floyd had Wynn drive a New Holland tractor that Kellar reported stolen from Ashtabula County to 2061 Atkinson Ave. Youngstown, Ohio so the owner, Heather/James Kellar could report it stolen and collect \$30,000.00 in insurance proceeds. The tractor was discovered by Youngstown Police/Fire and the State Fire Marshall when law enforcement investigated the arson at 2061 Atkinson Ave. Youngstown, Ohio in February of 2016. This crime was hidden until the fire in February of 2016 at 2061 Atkinson Rd. Youngstown, Ohio. This crime was committed in Mahoning, Ashtabula and Trumbull Counties.

Incident Eight: Aggravated Arson, §2909.02, F1
Defendants: Tricia Floyd, Heather Kellar, Kyrene Rodriquez, Juan Rodriguez
Date of Offense: On or about August 19, 2015

The defendant(s) unlawfully did by means of fire or explosion knowingly create, through the offer or acceptance of an agreement for hire or other consideration, a substantial risk of physical harm to any occupied structure, to wit: 2036 Atkinson Rd Youngstown, Ohio.

Kellar was hired by Kyrene Rodriguez and/or Juan Rodriguez and/or Tricia Floyd to burn 2036 Atkinson Rd Youngstown, Ohio to the ground and on August 19, 2015 while the Rodriguez's were in Columbus, Ohio the house burned to the ground. The house was purchased in 2012 by the Rodriguez's at an auction for \$5,000.00. It was not insured until May of 2015. There was no water activity at the property from April of 2014 to May of 2015 when minimal consumption occurred. The Rodriguez's were in fact delinquent in paying the city of Youngstown water bill. Kellar set the fire so that investigators could not determine the cause of the fire. The cause was learned by means other than taking samples to a lab for analysis. The Rodriguez's were aware that the fire was going to be set by Kellar and were part of the plan.

Incident Nine: Aggravated Arson, §2909.02, F2
Defendants: Tricia Floyd, Heather Kellar, Kyrene Rodriguez, Juan Rodriguez
Date of Offense: On or about August 19, 2015

The defendant(s) unlawfully did by means of fire or explosion knowingly cause physical harm to any occupied structure, to wit: 2036 Atkinson Rd Youngstown, Ohio.

The Rodriguez's purchased this property at an auction from \$5,000.00 in 2012 and did not live in it. In May of 2015 they took out an insurance policy on the property and commenced to periodically stay in the house on the property, then in August of 2015 the house on the property burned to the ground. The Rodriguez's were in fact delinquent in paying the city of Youngstown water bill. Kellar set the fire so that investigators could not determine the cause of the fire. The cause was learned by means other than taking samples to a lab for analysis. The Rodriguez's were aware that the fire was going to be set by Kellar and were part of the plan.

Incident Ten: Arson, §2909.03, F4
Defendants: Tricia Floyd, Heather Kellar, Kyrene Rodriguez, Juan Rodriguez
Date of Offense: On or about August 19, 2015

The defendant(s) unlawfully did by means of fire or explosion knowingly cause or create a substantial risk of physical harm to any property of Juan Rodriguez and Kyrene Rodriguez, to wit: 2036 Atkinson Rd Youngstown, Ohio, with purpose to defraud.

The Rodriguez's purchased this property at an auction from \$5,000.00 in 2012 and did not live in it. In May of 2015 they took out an insurance policy on the property and commenced to periodically stay in the house on the property, then in August of 2015 the house on the property burned to the ground. The Corpus Delicti of the crime discovered after July of 2016. The amount of money Farmers insurance paid out--\$336,576.99. The Rodriguez's were in fact delinquent in paying the city of Youngstown water bill. Kellar set the fire so that investigators could not determine the cause of the fire. The cause was learned by means other than taking samples to a lab for analysis. The Rodriguez's were aware that the fire was going to be set by Kellar and were part of the plan.

Incident Eleven: Aggravated Theft, §2913.02, F3
Defendants: Tricia Floyd, Heather Kellar, Kyrene Rodriguez, Juan Rodriguez
Date of Offense: On or about August 19, 2015

The defendant(s) unlawfully did with purpose to deprive the owner, Farmers Insurance, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at one hundred fifty thousand dollars or more. The Rodriguez's purchased this property at an auction from \$5,000.00 in 2012 and did not live in it. In May of

2015 they took out an insurance policy on the property and commenced to periodically stay in the house on the property, then in August of 2015 the house on the property burned to the ground. The amount of money Farmers insurance paid out--\$336,576.99. The Rodriguez's were in fact delinquent in paying the city of Youngstown water bill. Kellar set the fire so that investigators could not determine the cause of the fire. The cause was learned by means other than taking samples to a lab for analysis. The Rodriguez's were aware that the fire was going to be set by Kellar and were part of the plan.

Incident Twelve **Insurance Fraud, §2913.47, F3**
Defendants Tricia Floyd, Heather Kellar, Kyrene Rodriquez, Juan Rodriguez
Date of Offense On or about August 19, 2015

The defendant(s) unlawfully did, with purpose to defraud or knowing that he was facilitating a fraud, present to, or cause to be presented to, an insurer any written or oral statement that was part of, or in support of, an application for insurance, a claim for payment pursuant to a policy, or a claim for any other benefit pursuant to a policy, knowing that the statement, or any part of the statement, was false or deceptive and the amount of the claim involved was more than \$100,000.00.

The Rodriguez's purchased this property at an auction from \$5,000.00 in 2012 and did not live in it. In May of 2015 they took out an insurance policy on the property and commenced to periodically stay in the house on the property, then in August of 2015 the house on the property burned to the ground. The Corpus Delicti of the crime discovered after July of 2016. The amount of money Farmers insurance paid out--\$336,576.99. The Rodriguez's were in fact delinquent in paying the city of Youngstown water bill. Kellar set the fire so that investigators could not determine the cause of the fire. The cause was learned by means other than taking samples to a lab for analysis. The Rodriguez's were aware that the fire was going to be set by Kellar and were part of the plan.

Incident Thirteen **Arson, §2909.03, F4**
Defendants Tricia Floyd, Heather Kellar, Kyrene Rodriquez
Date of Offense On or about July 9, 2011

The defendants unlawfully did by means of fire or explosion knowingly cause or create a substantial risk of physical harm to any property of Tricia Floyd, to wit: Garage located at 2061 Atkinson Rd Youngstown, Ohio, with purpose to defraud.

This was a garage fire located at 2061 Atkinson Ave. Youngstown, Ohio. \$30,140.54 paid out by Farmers. Floyd was home at the time of the fire. Her granddaughter was in or near the garage at the time the fire occurred. The defendants were involved in the planning, and setting of the fire and the cover-up as to what actually occurred. The fire was sent to collect insurance money to purchase personal property with.

Incident Fourteen **Aggravated Arson, §2909.02, F2**
Defendants Tricia Floyd, Heather Kellar, Kyrene Rodriquez
Date of Offense On or about December 10, 2012

The defendant(s) unlawfully did by means of fire or explosion knowingly cause physical harm to any occupied structure, to wit: 2328 Carson Salt Springs Rd Warren, Ohio.

Floyd, Kyrene Rodriquez and Kellar were involved in setting fires in Mahoning and Trumbull County for the purpose of collecting insurance proceeds, money. This the group participated in a course of conduct in two counties. Mahoning and Trumbull County. Included within this course of conduct were acts constituting Aggravated Arson, Arson, theft, Insurance Fraud and other crimes. With respect to this

particular fire a person who is not indicted was solicited by Floyd and/or Kellar to burn the house located at this property down. The solicited person declined the offer. The group did the fire themselves with Kellar being out of Ohio, leaving the day of the fire, at the time the flames began to burn. This is the first fire at this address. While the house was being rebuilt a second fire was set burning the house down. State Farm paid Kellar \$264,480.33. This is the first fire set.

Incident Fifteen **Arson, §2909.03, F3**
Defendants Tricia Floyd, Heather Kellar, Kyrene Rodriquez
Date of Offense On or about December 10, 2012

The defendant(s) unlawfully did by means of fire or explosion knowingly cause or create a substantial risk of physical harm through the offer or the acceptance of an agreement for hire or other consideration to property of Heather Kellar, to wit: 2328 Carson Salt Springs Rd Warren, Ohio, with purpose to defraud.

Floyd, Kyrene Rodriquez and Kellar were involved in setting fires in Mahoning and Trumbull County for the purpose of collecting insurance proceeds, money. This the group participated in a course of conduct in two counties. Mahoning and Trumbull County. Included within this course of conduct were acts constituting Aggravated Arson, Arson, theft, Insurance Fraud and other crimes. With respect to this particular fire a person who is not indicted was solicited by Floyd and/or Kellar to burn the house located at this property down, having left the day the flames started. The solicited person declined the offer. The group did the fire themselves with Kellar being out of Ohio. This is the first fire at this address. While the house was being rebuilt a second fire was set burning the house down. State Farm paid Kellar \$264,480.33. This is the first set fire.

Incident Sixteen **Arson, §2909.03, F4**
Defendants Tricia Floyd, Heather Kellar, Kyrene Rodriquez
Date of Offense On or about December 10, 2012

The defendant(s) unlawfully did by means of fire or explosion knowingly cause or create a substantial risk of physical harm to any property of Heather Kellar, to wit: 2328 Carson Springs Rd Warren, Ohio, with purpose to defraud.

Floyd, Kyrene Rodriquez and Kellar were involved in setting fires in Mahoning and Trumbull County for the purpose of collecting insurance proceeds, money. This the group participated in a course of conduct in two counties. Mahoning and Trumbull County. Included within this course of conduct were acts constituting Aggravated Arson, Arson, theft, Insurance Fraud and other crimes. With respect to this particular fire a person who is not indicted was solicited by Floyd and/or Kellar to burn the house located at this property down. The solicited person declined the offer. The group did the fire themselves with Kellar being out of Ohio, leaving the day of the fire, at the time the flames began to burn. This is the first fire at this address. While the house was being rebuilt a second fire was set burning the house down. State Farm paid Kellar \$264,480.33 as a result of fraud.

Incident Seventeen **Insurance Fraud, §2913.47, F3**
Defendants Heather Kellar
Date of Offense On or about December 10, 2012

The defendant(s) unlawfully did, with purpose to defraud or knowing that he was facilitating a fraud, present to, or cause to be presented to, an insurer any written or oral statement that was part of, or in support of, an application for insurance, a claim for payment pursuant to a policy, or a claim for any other

benefit pursuant to a policy, knowing that the statement, or any part of the statement, was false or deceptive and the amount of the claim involved was more than one hundred fifty thousand.

Floyd, Kyrene Rodriquez and Kellar were involved in setting fires in Mahoning and Trumbull County for the purpose of collecting insurance proceeds, money. This the group participated in a course of conduct in two counties. Mahoning and Trumbull County. Included within this course of conduct were acts constituting Aggravated Arson, Arson, theft, Insurance Fraud and other crimes. With respect to this particular fire a person who is not indicted was solicited by Floyd and/or Kellar to burn the house located at this property down. The solicited person declined the offer. The group did the fire themselves with Kellar being out of Ohio, leaving the day of the fire, at the time the flames began to burn. This is the first fire at this address. While the house was being rebuilt a second fire was set burning the house down. State Farm paid Kellar \$264,480.33 This is the first fire at this address.

Incident Count Eighteen **Aggravated Arson, §2909.02, F2**
Defendants Heather Kellar
Date of Offense On or about January 23, 2014

The defendant(s) unlawfully did by means of fire or explosion knowingly cause physical harm to any occupied structure, to wit: 2328 Carson Salt Springs Rd. Warren, Ohio.

Floyd, Kyrene Rodriquez and Kellar were involved in setting fires in Mahoning and Trumbull County for the purpose of collecting insurance proceeds, money. This the group participated in a course of conduct in two counties. Mahoning and Trumbull County. Included within this course of conduct were acts constituting Aggravated Arson, Arson, theft, Insurance Fraud and other crimes. This is the second fire at this address. While the house was being rebuilt it was burned down.

Incident Nineteen **Arson, §2909.03, F4**
Defendants Heather Kellar
Date of Offense On or about January 23, 2014

The defendant(s) unlawfully did by means of fire or explosion knowingly cause or create a substantial risk of physical harm to any property of Heather/James Kellar, to wit: 2328 Carson Salt Springs Rd, with purpose to defraud.

Floyd, Kyrene Rodriquez and Kellar were involved in setting fires in Mahoning and Trumbull County for the purpose of collecting insurance proceeds, money. This the group participated in a course of conduct in two counties. Mahoning and Trumbull County. Included within this course of conduct were acts constituting Aggravated Arson, Arson, theft, Insurance Fraud and other crimes. This is the second fire at this address. While the house was being rebuilt it was burned down. The payout from State Farm was \$282,794.60 as a result of fraud.

Incident Twenty **Aggravated Theft, §2913.02, F3**
Defendants Heather Kellar
Date of Offense On or about January 23, 2014

The defendant(s) unlawfully did with purpose to deprive the owner, State Farm Insurance, of property or services, to wit: money, knowingly obtain or exert control over either the property or services by deception.

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

Floyd, Kyrene Rodriquez and Kellar were involved in setting fires in Mahoning and Trumbull County for the purpose of collecting insurance proceeds, money. This the group participated in a course of conduct in two counties. Mahoning and Trumbull County. Included within this course of conduct were acts constituting Aggravated Arson, Arson, theft, Insurance Fraud and other crimes. This is the second fire at this address. While the house was being rebuilt it was burned down. The payout from State Farm was \$\$282,794.60 as a result of fraud.

Incident Twenty-One	Insurance Fraud, §2913.47, F3
Defendants	Heather Kellar
Date of Offense	On or about January 23, 2014

The defendant(s) unlawfully did, with purpose to defraud or knowing that he was facilitating a fraud, present to, or cause to be presented to, an insurer any written or oral statement that was part of, or in support of, an application for insurance, a claim for payment pursuant to a policy, or a claim for any other benefit pursuant to a policy, knowing that the statement, or any part of the statement, was false or deceptive and the amount of the claim involved was more than one hundred fifty thousand.

Floyd, Kyrene Rodriquez and Kellar were involved in setting fires in Mahoning and Trumbull County for the purpose of collecting insurance proceeds, money. This the group participated in a course of conduct in two counties. Mahoning and Trumbull County. Included within this course of conduct were acts constituting Aggravated Arson, Arson, theft, Insurance Fraud and other crimes. This is the second fire at this address. While the house was being rebuilt it was burned down. The payout from State Farm was \$\$282,794.60 as a result of fraud.

Incident Twenty-Two	Tampering with Records, §2913.42, F4
Defendants	Tricia Floyd, Heather Kellar, Theodore Edward Dozier Wynn
Date of Offense	On or about February 24, 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 Nationwide Insurance falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Insurance Claim Application 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.

Lying on an insurance claim, about property being stolen to collect insurance proceeds when in fact Kellar and Floyd secured the services of Wynn to drove a reportedly stolen New Holland tractor from Kellar real estate in Ashtabula County to 2061 Atkinson Rd Youngstown, Ohio. The tractor and the crime were discovered in February of 2016 when Youngstown Police and Fire and the State Fire Marshall responded to 2061 Atkinson Rd to investigate the fire that occurred thereon, and discovered the tractor.

Incident Twenty-Three	Tampering with Records, §2913.42, F3
Defendants	Tricia Floyd
Date of Offense	On or about February 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 Allstate Insurance Company falsify, destroy, remove, conceal, alter,

deface, or mutilate any writing, computer software, data, or record, to wit: Insurance claim application, and the application process and the value of the data or computer software involved in the offense or the loss to the victim was one hundred fifty thousand dollars or more and/or the offense was committed for the purpose of devising or executing a scheme to defraud or to obtain property or services and the value of the property or services or the loss to the victim was seven thousand five hundred dollars or more.

Floyd participated in burning her house down which was located at 2061 Atkinson Rd Youngtown, Ohio. The fire was ruled an arson by arson investigators as there were 4 locations within the house where accelerant was discovered. Floyd made an application for insurance coverage and monies which was granted, receiving in excess of \$250,000.00 asserting that she was not involved in setting the fire.

Incident Twenty-Four **Tampering with Records, §2913.42, F3**
Defendants Tricia Floyd
Date of Offense On or about 3/1/2012 through 11/1/2016

The defendant(s) unlawfully did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on U.S. Social Security Administration falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Social Security Paperwork and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity.

Floyd received \$290,000.00 for mineral rights on property she owned in Youngstown, Ohio then falsified Social Security records so that she could continue to receive social security benefits

Incident Twenty-Five **Tampering with Records, §2913.42, F3**
Defendants Tricia Floyd
Date of Offense On or about 1/1/2015 through 10/1/2016

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 U.S. Social Security Administration falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Social Security records and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity.

Floyd received \$290,000.00 for mineral rights on property she owned in Youngstown, Ohio then falsified Social Security records so that she could continue to receive social security benefits.

Incident Twenty-Six **Burglary, § 2911.12 (A)(2)F2**
Defendants Tricia Floyd, Jessica Gonzalez
Date of Offense On or about 05/09/2013

The defendant(s) unlawfully did by force, stealth, or deception, Trespass in an occupied structure or in a separately secured or separately occupied portion of an occupied structure that is a permanent or temporary habitation of any person when any person other than an accomplice of the offender is present or likely to be present, with purpose to commit in the habitation any criminal offense; to wit, the house located at 1105 Garland Ave Youngstown, Ohio.

Incident Twenty-Seven **Burglary, §2911.12 (A)(3)F3**
Defendants Tricia Floyd, Jessica Gonzalez
Date of Offense On or about 05/09/2013

The defendant(s) unlawfully did by force, stealth, or deception Trespass in an occupied structure or in a separately secured or separately occupied portion of an occupied structure, with purpose to commit in the structure or separately secured or separately occupied portion of the structure any criminal offense, to wit, the house located at 1105 Garland Ave Youngstown, Ohio in violation of Section 2911.12 (A)(3)

Incident Twenty-Eight **Forgery §2913.31(a)(1) (f)(5)**
Defendants Juan Rodriguez, Heather Kellar,
Date of Offense On or about January 2011 to December 2011

The defendant(s) did, with purpose to defraud, or knowing that the person is facilitating a fraud, shall forge any writing of another without the other person's authority. Kellar created forged or counterfeit U.S. currency with the help of Rodriguez and others. The forged money was later passed in Mahoning and Trumbull County by a number of people at bars, restaurants, gas stations and similar businesses.

Incident Twenty-Nine **Forgery §2913.31(a)(1) (f)(5)**
Defendants Juan Rodriguez, Heather Kellar,
Date of Offense On or about January 2011 to December 2011

The defendant(s) did, with purpose to defraud, or knowing that the person is facilitating a fraud, shall forge any writing of another without the other person's authority. Kellar created forged or counterfeit U.S. currency with the help of Rodriguez and others. The forged money was later passed in Mahoning and Trumbull County by a number of people at bars, restaurants, gas stations and similar businesses.

Incident Thirty **Forgery §2913.31(a)(3) (f)(5)**
Defendants Juan Rodriguez, Heather Kellar,
Date of Offense On or about January 2012 to December 2012

The defendant(s) did, with purpose to defraud, or knowing that the person is facilitating a fraud, shall forge any writing of another without the other person's authority. Kellar created forged or counterfeit U.S. currency with the help of Rodriguez and others. The forged money was later passed in Mahoning and Trumbull County by a number of people at bars, restaurants, gas stations and similar businesses.

Incident Thirty-One **Forgery §2913.31(a)(3), (f)(5)**
Defendants Juan Rodriguez, Heather Kellar,
Date of Offense On or about January 2012 to December 2012

The defendant(s) did, with purpose to defraud, or knowing that the person is facilitating a fraud, shall forge any writing of another without the other person's authority. Kellar created forged or counterfeit U.S. currency with the help of Rodriguez and others. The forged money was later passed in Mahoning and Trumbull County by a number of people at bars, restaurants, gas stations and similar businesses.

Incident Thirty-Two **Tampering with Records, §2913.42 (f)(4)**

Defendant: Juan Rodriguez
Date of Offense: May 5, 2013

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 Farmers Insurance Company did falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: insurance claim forms.

Rodriguez falsely reported that his home located at 2031 Atkinson Rd Youngstown, Ohio had been burglarized and that an expensive camera and other items were stolen, when in fact such either never occurred or Rodriguez orchestrated the incident so that he would collect insurance money. Rodriguez collected \$10,000.00 in insurance proceeds as a result of the fraud.

Incident Thirty-Three Insurance Fraud, §2913.47, F4
Defendant: Juan Rodriguez
Date of Offense: May 5, 2013

The defendant(s) unlawfully did, with purpose to defraud or knowing that he was facilitating a fraud, present to, or cause to be presented to, an insurer any written or oral statement that was part of, or in support of, an application for insurance, a claim for payment pursuant to a policy, or a claim for any other benefit pursuant to a policy, knowing that the statement, or any part of the statement, was false or deceptive and the amount of the claim involved was ten thousand dollars.

Rodriguez falsely reported that his home located at 2031 Atkinson Rd Youngstown, Ohio had been burglarized and that an expensive camera and other items were stolen, when in fact such either never occurred or Rodriguez orchestrated the incident so that he would collect insurance money. Rodriguez collected \$10,000.00 in insurance proceeds as a result of the fraud.

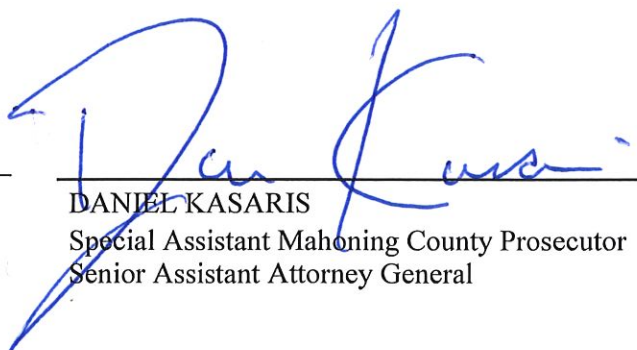
in violation of Section 2921.32(A)(1) of the Ohio Revised Code, a Felony of the First Degree, and against the peace and dignity of the State of Ohio.

And further the grand jury does find that at least one incident of corrupt activity was a Felony of the First, Second or Third Degree and that specifically at least one incident of corrupt activity is a Felony of the First Degree.

ENDORSED A TRUE BILL:



Foreperson, Grand Jury



DANIEL KASARIS
Special Assistant Mahoning County Prosecutor
Senior Assistant Attorney General