

THE STATE OF OHIO, HAMILTON COUNTY

COURT OF COMMON PLEAS

STATE OF OHIO

Plaintiff

-vs-

PETER BECK, CHRISTOPHER TECHNOLOGIES, LLC., JANET S. COMBS, ARK BY THE RIVER FELLOWSHIP MINISTRY, INC., and TML CONSULTING, LLC

Defendants

Case No. B 1400589

PROSECUTING ATTORNEY'S REQUEST
FOR ISSUANCE OF SUMMONS
UPON INDICTMENT

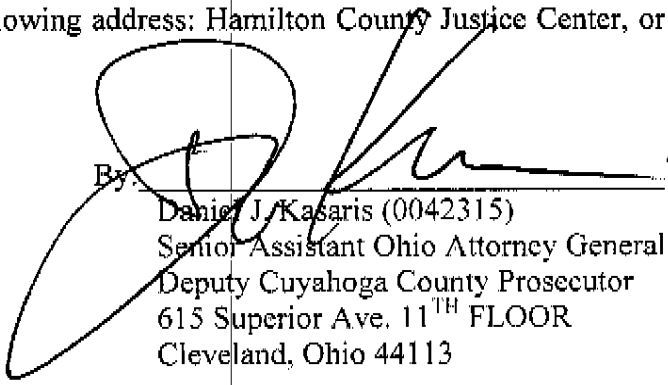
TO THE CLERK OF THE COURT OF COMMON PLEAS:

PETER BECK, CHRISTOPHER TECHNOLOGIES, LLC., JANET S. COMBS, ARK BY THE RIVER FELLOWSHIP MINISTRY, INC., AND TML CONSULTING, LLC have been named defendants in an indictment returned by the Grand Jury.

Pursuant to Rule 9, Ohio Rules of Criminal Procedure, the undersigned requests that you or a Deputy Clerk forthwith issue a summons to an appropriate officer and direct him to execute it upon the above-named defendants at the following address: Hamilton County Justice Center, or at any place within this State.



D105209486

By: 
Daniel J. Kasaris (0042315)
Senior Assistant Ohio Attorney General
Deputy Cuyahoga County Prosecutor
615 Superior Ave. 11TH FLOOR
Cleveland, Ohio 44113

THE STATE OF OHIO, HAMILTON COUNTY

COURT OF COMMON PLEAS

THE STATE OF OHIO)
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) SS.
)
 HAMILTON COUNTY)

Case No. B 1400589

INDICTMENT FOR:

- CT1: Engaging in a Pattern of Corrupt Activity 2923.32(A)(1)[F1]
- CT2: AggravatedTheft 2913.02(A)(2)[F3]
- CT3: AggravatedTheft 2913.02(A)(3)[F3]
- CT4: Theft 2913.02(A)(2)[F4]
- CT5: Theft 2913.02(A)(3)[F4]
- CT6: Theft 2913.02(A)(2)[F4]
- CT7: Theft 2913.02(A)(3)[F4]
- CT8: AggravatedTheft 2913.02(A)(2)[F3]
- CT9: Theft 2913.02(A)(3)[F4]
- CT10: Theft 2913.02(A)(2)[F4]
- CT11: Theft 2913.02(A)(2)[F4]
- CT12: Perjury 2921.11(A)[F3]
- CT13: Perjury 2921.11(A)[F3]
- CT14: Perjury 2921.11(A)[F3]
- CT15: Perjury 2921.11(A)[F3]
- CT16: Perjury 2921.11(A)[F3]
- CT17: Perjury 2921.11(A)[F3]
- CT18: Perjury 2921.11(A)[F3]
- CT19: Perjury 2921.11(A)[F3]
- CT20: Perjury 2921.11(A)[F3]
- CT21: Perjury 2921.11(A)[F3]
- CT22: Telecommunications Fraud 2913.05[F2]
- CT23: Telecommunications Fraud 2913.05[F3]
- CT24: Telecommunications Fraud 2913.05[F3]
- CT25: Telecommunications Fraud 2913.05[F3]
- CT26: Telecommunications Fraud 2913.05[F3]
- CT27: Telecommunications Fraud 2913.05[F2]
- CT28: Receiving Stolen Property 2913.51(A)[F4]

CT29: Receiving Stolen Property
2913.51(A)[F4]

CT30: Receiving Stolen Property
2913.51(A)[F4]

CT31: Receiving Stolen Property
2913.51(A)[F4]

CT32: Receiving Stolen Property
2913.51(A)[F4]

CT33: Unlicensed Sale of a Security
1707.44(A)(1)[F1]

CT34: False Representations in the Sale of a
Security 1707.44(B)(4)[F1]

CT35: Unregistered Sale of a Security
1707.44(C)(1)[F1]

CT36: Sale of a Security By an Insolvent
Issuer 1707.44(D)[F1]

CT37: Fraudulent Sale of a Security
1707.44(G)[F1]

CT38: Prohibited Securities Act
1707.44(J)[F1]

CT39: Unlicensed Sale of a Security
1707.44(A)(1)[F2]

CT40: False Representations in the Sale of a
Security 1707.44(B)(4)[F2]

CT41: Unregistered Sale of a Security
1707.44(C)(1)[F2]

CT42: Sale of a Security By an Insolvent
Issuer 1707.44(D)[F2]

CT43: Fraudulent Sale of a Security
1707.44(G)[F2]

CT44: Prohibited Securities Act
1707.44(J)[F2]

CT45: Unlicensed Sale of a Security
1707.44(A)(1)[F1]

CT46: False Representations in the Sale of a
Security 1707.44(B)(4)[F1]

CT47: Unregistered Sale of a Security
1707.44(C)(1)[F1]

CT48: Sale of a Security By an Insolvent
Issuer 1707.44(D)[F1]

CT49: Fraudulent Sale of a Security
1707.44(G)[F1]

CT50: Prohibited Securities Act
1707.44(J)[F1]

CT51: False Representations in the Sale of a
Security 1707.44(B)(4)[F2]

- CT52: Unlicensed Sale of a Security
1707.44(A)(1)[F1]
- CT53: False Representations in the Sale of a
Security 1707.44(B)(4)[F2]
- CT54: Unregistered Sale of a Security
1707.44(C)(1)[F2]
- CT55: Sale of a Security By an Insolvent
Issuer 1707.44(D)[F2]
- CT56: Fraudulent Sale of a Security
1707.44(G)[F2]
- CT57: Prohibited Securities Act
1707.44(J)[F2]
- CT58: Money Laundering
1315.55(A)(2)[F3]
- CT59: Money Laundering
1315.55(A)(2)[F3]
- CT60: Money Laundering
1315.55(A)(2)[F3]
- CT61: Money Laundering
1315.55(A)(2)[F3]
- CT62: Money Laundering
1315.55(A)(2)[F3]
- CT63: Money Laundering
1315.55(A)(2)[F3]

In the Court of Common Pleas, Hamilton County, Ohio, of the Grand Jury Term Two Thousand and Fourteen.

FIRST COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, TML CONSULTING, LLC., JANET COMBS, AND ARK BY THE RIVER** on or about **February in the year Two Thousand and Five through June in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **employed by, or associated with, any enterprise, knowingly conducted or participated in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity or the collection of an unlawful debt, to wit: while**

employed by, or associated with, any enterprise did conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity or the collection of an unlawful debt and at least one of the incidents of corrupt activity was a felony of the first, second, or third degree.

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 John Fussner, Tom Lysaght, Peter Beck, Janet Combs, the Arc By the River Church, TML Consulting LLC., Christopher Technologies, Vernon "Chip" Demois, CRT Resources, MuseAegis Entertainment Complex LLC., Friends of Pete Beck, Charlene Parsons, Stat Surgical Associates Inc., and others known and not known all of whom are persons associated with the Enterprise (collectively, "Persons associated with the Enterprise" or "Persons"). This Enterprise existed as an "Association in Fact Enterprise" under R.C. Section 2932.32 because it: (1) was an ongoing organization with a commonality of purpose or a guiding mechanism to direct the organization or (2) was a continuing unit with an ascertainable structure and/or (3) had an organizational structure that was distinct from the pattern of predicate acts. As an alternative to point (3), this Enterprise is an illicit enterprise under R. C. Section 2932.32 because it had an organizational structure distinct from the pattern of predicate acts whether or not this enterprise performed any legal acts. The persons and/or companies associated with the Enterprise performed, from time to time, some lawful acts while working for entities connected with the Enterprise, and as a result this Enterprise existed separate and apart from the pattern of corrupt activity described in this Indictment. For example legitimate investments were in fact made, money was in fact taken and spent as the investor intended, and furthermore, Christopher Technologies was working on developing a legitimate product and did in fact have at least one legitimate customer who it sold its product, ACCOUNT4ME to. In addition MuseAegis did have persons under contract to record Record Albums in Nashville Tennessee and Stat

Surgical Associates did provide a lawful service to hospitals by contracting with them to provide professional medical persons to staff emergency rooms. A more detailed description of the Enterprise is stated in below.

A. THE PARTIES

Peter Beck, Tom Lysaght, John Fussner, Janet Combs, the Arc By the River Church, TML Consulting LLC., Christopher Technologies LLC (CTECH), Chip Demois, CRT Resources, MuseAegis Entertainment Company LLC., Friends of Pete Beck, Charlene Parsons are key people involved in two or more events that constitute a Pattern of Corrupt Activity as described in this indictment as were persons along with others named and described herein were associated with this Enterprise.

TOM LYSAGHT—Tom Lysaght was the chief rainmaker in this criminal enterprise bringing in hundreds of thousands of dollars of investors monies into his companies and into the enterprise so that such monies could be diverted for his personal use, his wife's personal use and to the Ark by the River. Lysaght was paid a commission for his sales. He did not have a license in the State of Ohio to sell securities. Lysaght for example together with Peter Beck convinced investors to invest money into CTECH by failing to disclose to investors that CTECH was insolvent, could not pay its rent, its internet bills, its taxes, its payroll, and /or other responsibilities or obligations it had. Lysaght further misrepresented the financial state of CTECH, falsely represented pending positive business deals, namely any arrangement with Carnival Cruise Corporation and or others involving CTECH and diverted money or caused money to be diverted to: his wife, Janet Combs or her church, The Arc By The River, to other companies he was involved in without the knowledge of the investors. Tom Lysaght died in November of 2010.

PETER BECK—Peter Beck was the CFO for Christopher Technologies, an accountant, an accountant for CTECH and a member of the Accounting Firm Donahoo, Cupp and Beck.

Beck as CFO of CTECH convinced and /or solicited investors to invest thousands of dollars into Christopher Technologies (CTECH) and did not inform such investors that CTECH was insolvent, that it was not paying into its employees 401(k) retirement plan, could not pay its rent, its internet bills, its taxes, its payroll, and /or other responsibilities or liabilities that it had. Beck further misrepresented the financial state of CTECH, falsely represented pending positive business deals involving CTECH and Carnival Cruise lines, was paid remuneration and/or commission/compensation from CTECH without disclosing such to his partners at Donahoo, stole money belonging to Donahoo, and was involved in by stealing \$500,000.00 from Michael Farms Inc., and diverted or had diverted \$5,000.00 of the Michael Farms Inc., investment into his political committee's bank account, the Friends of Pete Beck which it retained and spent. Beck further caused monies invested by Linda Evans to be diverted to his political campaign fund without the consent of Linda Evans. To cover up/hide his true involvement in this matter Beck perjured himself a number of times in testimony before the Ohio Division of Securities. Beck also used his position as former Vice- Mayor of Mason, Ohio to secure investments from investors.

FRIENDS OF PETER BECK---Friends of Pete Beck is the Political Campaign Committee for Peter Beck who is an Ohio State Representative and Chairman of the Ohio House, House Ways and Means Committee. It maintains a separate fund from Peter Beck to raise money for Peter Beck's elections. The Friends of Peter Beck received and retained stolen proceeds stolen from multiple investors during the existence of this enterprise without the knowledge, consent or approval of the investor as explained above. The funds were then spent by the campaign fund.

JOHN FUSSNER---John Fussner was the President of Christopher Technologies LLC. CTECH had employees, a profit sharing plan, an office and typical operating expenses for a company or a startup company. By April of 2008, it was insolvent. Fussner together with

Mark Woods founded CTECH to develop a product to sell to Universities, Cruise Lines, and other institutions that tracks people when such persons are located within a particular business or location. Woods was the person who was to develop the software and Fussner managed the company. Fussner misrepresented the financial condition of Christopher Technologies LLC (CTECH) to investors to secure monies. Fussner also failed to disclose the true financial condition of CTECH to investors who relied upon Fussner's representations to them to make their investments. CTECH did have one client, a University in Southwestern that purchased its product. The software was never actually patented.

JANET COMBS---the wife of Thomas Lysaght. She is the pastor or runs the Ark by the River Church. She and Ark by the River received funds which were stolen by Tom Lysaght from investors through TML Consulting Llc. Investors believed that they were investing in CTECH or MuseAegis or Stat Surgical not a church in Cincinnati, Ohio. Combs received such funds often when the account of the church was overdrawn or close to having \$0.00 dollars within it. The Ark by the River is a cult.

TML CONSULTING, LLC.,--is the Company Thomas Lysaght used to receive money from investors which he then diverted illegally to himself, his wife, the Ark by the River church, Friends of Pete Beck. TML Consulting Inc. is a shell company owned and operated by Lysaght and Janet Combs.

VERNON "CHIP" DEMOIS---Demois was hired by Thomas Lysaght and Peter Beck to provide consulting services for raising money for CTECH. Demois received stolen money. After he became aware that money was wrongfully diverted from an investor to him and other places he ceased doing business with Lysaght and Beck, but did receive stolen proceeds from Michael Farms Inc.

MUSEAEGIS ENTERTAINMENT COMPLEX LLC—was/is a company located in Nashville Tennessee that had under contract recording artist to create record albums. Lysaght convinced investors to invest in MuseAegis the diverted monies invested to other entities without the knowledge, consent, or approval of the specific investor.

CHARLENE PARSONS--- had the title of bookkeeper and or comptroller of CTECH and worked directly under Peter Beck. She is deceased.

STAT SURGICAL ASSOCIATES INC., —A company whose primary business was to provide medical professionals to hospitals so that the hospital could properly staff an emergency room. Lysaght convinced investors to invest in Stat when in fact the monies were deposited into TML Consulting Llc and then diverted money to other entities without the knowledge, consent or approval of the specific investor.

Venue: at the times of the acts complained of herein were committed, TML Consulting Llc, was located in Hamilton County, Ark by the River was located in Hamilton County, Janet Combs lived in Hamilton County, Thomas Lysaght lived in Hamilton County CTECH was located in Butler County. Meetings with victims, wire transfers, and the transfer of money may have occurred in Hamilton County, Butler County and/ Warren County.

B. THE PLAN OF THE ENTERPRISE AND ITS HEIRARCHY

Within the scope of this enterprise and to further its affairs Thomas Lysaght was a rainmaker, a person who raised money for various business ventures in the United States.

Within the scope of this enterprise and to further its affairs Thomas Lysaght and Janet

Combes formed and or operated TML Consulting Inc., and solicited investors to invest money in TML or any number of companies.

Within the scope of this enterprise and to further its affairs Lysaght lied to investors about the true financial condition of the companies to get investors to invest in TML Consulting LLC., MuseAegis, CTECH, and Stat Surgical.

Within the scope of this enterprise and to further its affairs Lysaght diverted money from the legitimate source of the investment to illegitimate places or places the investor never intended the investment to go, i.e. Janet Combs, Tom Lysaght, and or the Ark by the River Church, Friends of Pete Beck, and/or TML consulting.

Within the scope of this enterprise and to further its affairs, Peter Beck represented himself as and/ or was the CFO of CTECH.

Within the scope of this enterprise and to further its affairs, Peter Beck lied to the Ohio Division of Securities more than 20 times about his role in this criminal enterprise, lied about his discharge from Donahoo Cupp and Beck, and on other subjects under oath about material facts.

Within the scope of this enterprise and to further its affairs, Peter Beck lied to the Ohio Division of Securities under oath about material and non-material facts concerning his role in this criminal enterprise, investments made into CTECH, and /or about other facts.

Within the scope of this enterprise and to further its affairs, Peter Beck lied about and withheld from investors the true financial condition of CTECH, that it had a contract and

or that it was receiving money from or had a contract with Carnival Cruise Lines and or was close to a entering into a contract with Carnival Cruise Lines.

Within the scope of this enterprise and to further its affairs Peter Beck failed to disclose to investors the true financial condition of CTECH, that it was in fact not paying its taxes, not paying into its employees retirement fund, that its product was not patented, that CTECH could not pay its rent, did NOT have a contract and was not close to entering into a contract with Carnival Cruise Corporation, or that CTECH was insolvent or that he was receiving remuneration from CTECH based up on investments made.

Within the scope of this enterprise and to further its affairs Peter Beck knew that monies were being diverted from CTECH employee's 401k profit sharing plan without the knowledge and or consent of any employee.

Within the scope of this enterprise and to further its affairs Peter Beck caused investors monies to be diverted from the intended source of the investor's investment to his political campaign fund called the Friends of Pete Beck.

Within the scope of this enterprise and to further its affairs Peter Beck retained investor monies and or spent investor monies after such had been deposited into his campaign account knowing or having reasonable cause to believe that the funds had been obtained through the commission of a theft offense when the amount stolen was \$5,000.00.

Within the scope of this enterprise and to further its affairs Beck, Fussner and Lysaght sold securities of an insolvent company without a license, committed fraud in the sale of the securities and/or made false representations to investors in the sale of securities.

Within the scope of this enterprise and to further its affairs, John Fussner failed to disclose to investors any number of times the true financial condition of CTECH, that it was in fact not paying its taxes, that it was insolvent, that is was not paying into its employees retirement fund or benefit plan, that it could not pay its rent and other liabilities, that it did NOT have a contract and was not close to entering into a contract with Carnival Cruise lines.

Within the scope of this enterprise and to further its affairs, Janet Combs received stolen money, money that was diverted by her husband to her or her church the Ark by the River.

Within the scope of this enterprise and to further its affairs Chip Demois received and or retained stolen funds from at least one investor after he reported the theft to Beck and others.

Within the scope of this enterprise and to further its affairs, John Fussner and Peter Beck were involved in diverting employee wage withholdings from their intended place of expenditure i.e., employee retirement plan or the Ohio Department of Taxation and the Internal Revenue Service.

Within the scope of this enterprise and to further its affairs Peter Beck lied to Donahoo, Cupp and Beck (accounting firm) about the fact that he was receiving remuneration from CTECH and not just doing accounting work for CTECH, while CTECH owed Donahoo thousands of dollars for accounting services rendered.

Within the scope of this enterprise and to further its affairs investor after investor was convinced by Beck, Fussner or Lysaght to invest their money in any number of companies either failing to disclose to investors actually (1) where the money was going, (2) how the

money was going to be spent, (3) the true financial condition of the companies which the investors thought that they were investing in.

Within the scope of this enterprise and to further its affairs Beck, Fussner, or Lysaght caused a wire to be used to further their scheme to defraud when investors wired money from accounts the investors had to CTECH or TML Consulting LLC.

Within the scope of this enterprise and to further its affairs, Beck, Fussner or Lysaght caused stolen investor money to be laundered and or diverted for personal or other not-intended for uses.

Within the scope of this enterprise and to further its affairs Tom Lysaght sometimes with the help of Peter Beck and or John Fussner brought in money/investments into any number of companies that was misspent, that was spent on a use which was not intended by an investor.

Within the scope of this enterprise and to further its affairs, Janet Combs, Ark by the River and Tom Lysaght received one third of all monies invested in TML Consulting LLC from January 12, 2005 to January 14, 2011 or the amount of \$620,800.00 without the consent, knowledge, or permission of the person who invested the money into TML Consulting LLC or an entity that money was transferred from and transferred to TML Consulting LLC.

Within the scope of this enterprise and to further its affairs at the time the acts complained of herein were committed, TML Consulting LLC, was located in Hamilton County, Ark by the River was located in Hamilton County, Janet Combs lived in Hamilton County, Thomas Lysaght lived in Hamilton County, CTECH was located in Butler County.

Meetings, wire transfers, and the transfer of investor's money occurred in Hamilton County, Warren and in Butler County.

C. COMMON PURPOSE OF THE ENTERPRISE: This Enterprise functioned as an ongoing organization with commonality of purpose or a guiding mechanism to direct the organization. From at least January of 2005 to June 2013, the common purpose of the Enterprise regarding its ongoing illegal conduct was to obtain money or investments by deception from people/investors so that members of the enterprise could personally profit from the investment, so that members of the enterprise could divert money to an unintended use, or so that other debts of members of the enterprise could be paid, and to pay other persons monies owed to them, to fund organizations unknown to victims. Additional member(s) of the criminal enterprise made false statements to investigators investigating the activities of the enterprise and those within it in an attempt to cover up acts committed.

As stated above, each Person Associated with the Enterprise performed separate acts on behalf of and in furtherance of the Enterprise. The persons associated with this enterprise were members of other entities so they needed to act in a structured and in an organized manner to enable the overall organization to successfully complete these schemes. Likewise, this occurred with the knowledge and/or support of other Persons Associated with the Enterprise in order that this Enterprise, as an association in fact, could continue and thrive because of the activities of each of the persons of the Enterprise

This Enterprise functioned as a continuing unit with an ascertainable structure while it was engaging in the diverse forms of illegal activities. In doing so from the time stated herein, the Persons Associated with the Enterprise participated in and/or managed the affairs of the Enterprise as previously stated. As such these persons provided continuity

and structure to the Enterprise in order to accomplish its illegal purposes—the pattern of corrupt activity as set forth in this count. This enterprise and the Persons Associated with the Enterprise were joined in purpose over a period of time, with various roles that were different, and with methods that changed in order to accomplish the main purpose of the Enterprise.

The structure of the organization, as an Enterprise in fact

Thomas Lysaght and Janet Combs owned and operated TML Consulting LLC.—Lysaght convinced investors to invest monies with him so that he could invest such monies into any of a number of companies

John Fussner started CTECH. Peter Beck was the CFO of CTECH. Beck brought Lysaght into CTECH to raise money for CTECH. Beck and Lysaght together convinced investors to invest millions of dollars into CTECH with monies being diverted to Lysaght, Janet Combs, and the Ark by the River Church, the Friends of Pete Beck and to other unintended recipients.

CTECH and other companies named in this indictment had a legitimate product and employees who were lawfully working for said companies.

This Enterprise is comprised of the Persons Affiliated with the Enterprise, all of whom acted with the purpose described in this Indictment, and all of whom conducted their activities over a period of time for a common purpose. This Enterprise as an informal association comprised of the Persons Associated with the Enterprise functioned as a continuing unit, separate from the pattern of activity in which it engaged because one or more persons associated with this Enterprise performed legal acts as described herein. The non-exclusive list of lawful activities described herein occurred while this Enterprise functioned as a continuing unit and with an organization structure which engaged in diverse forms of illegal activities as stated in this Indictment.

This Enterprise also consisted of corporations and limited liability companies. While the Persons Associated with the Enterprise may have performed, from time to time, some lawful acts as described above, while working for entities connected with the Enterprise, these Persons, however, also performed illegal acts as part of and in furtherance of this Enterprise, as stated in this Indictment. Based on the foregoing, this Enterprise existed separate and apart from the pattern of corrupt activity in which it was engaged, and this Enterprise functioned as a continuing unit by engaging in the diverse forms of illegal activities, as stated in this Indictment.

In the alternative, this Enterprise is an “illicit enterprise” under R. C. Section 2932.32 which is one that is unlawful or engaged in prohibited activities. The schemes described in this indictment constitute prohibited activities. This illicit enterprise existed separate and apart from the pattern of corrupt activity as described in this Indictment even if it did not do legal transactions during this time period.

As a result of either one of these two situations, this Enterprise functioned as an organizational structure and as a continuing unit, even though it was engaging in the diverse forms of illegal activities as described in this Indictment. In either situation, the persons associated with the Enterprise participated in and/or managed the affairs of the Enterprise and as such provided continuity and structure to the Enterprise in order to accomplish its illegal purpose—the pattern of corrupt activity explained in this count. This enterprise and the persons associated within it were joined in purpose over a period of time, although their various roles were different in order to accomplish the main purpose of the Enterprise. All these schemes were necessary to make the overall organization successful as an Enterprise engaged in corrupt activity. These activities occurred with the knowledge and or support of and or were aided or abetted by each of the persons associated with the Enterprise.

D. AFFAIRS OF THE ENTERPRISE: The affairs of the Enterprise involve the

jurisdiction of the State of Ohio and took place in Hamilton County, Butler County, Warren County as well as in other counties in Ohio and in other States and include but are not limited to:

1. Did conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity.
2. Did conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property.
3. Did by means engaging in, attempting to engage in, conspiring to engage in, or soliciting, coercing, or intimidating another person to engage in any conduct defined as "racketeering activity" under the "Organized Crime Control Act of 1970," 84 Stat. 941, 18 U.S.C. 1961(1)(B), (1)(C), (1)(D), and (1)(E), as amended specifically 18 USC 1341, 18 USC 1952, 1956 and 1957.
4. Did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services, Without the consent of the owner or person authorized to give consent; Beyond the scope of the express or implied consent of the owner or person authorized to give consent, or by deception when the amount involved was greater than \$7,500.00.
5. Did having devised a scheme to defraud, shall knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal,

picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.

6. Did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense when the value exceeded \$7,500.00

7. Did knowingly make or cause to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, when selling any securities in Ohio.

E. THE PATTERN OF CORRUPT ACTIVITY FROM January 2005 to June 1, 2013.

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. MONEY LAUNDERING R.C. 1355.15(a) (2): No person shall conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property.

2. CONDUCT DEFINED AS "RACKETEERING ACTIVITY" UNDER THE "ORGANIZED CRIME CONTROL ACT OF 1970: R.C. Section 2923.31 (I)(1) Did by means engaging in, attempting to engage in, conspiring to engage in, or soliciting, coercing, another person to engage in any conduct defined as "racketeering activity" under the

"Organized Crime Control Act of 1970," 84 Stat. 941, 18 U.S.C. 1961(1)(B), (1)(C), (1)(D), and (1)(E), as amended specifically 18 USC 18 USC 1952, 1956 and 1957.

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. **THEFT, 2913.02** No person with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services, Without the consent of the owner or person authorized to give consent; Beyond the scope of the express or implied consent of the owner or person authorized to give consent, or by deception, when the amount involved was greater than \$7,500.00.

5. **TELECOMMUNICATIONS FRAUD: 2913.05** No person did having devised a scheme to defraud, shall knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.

6. **RECEIVING STOLEN PROPERTY: R.C. 2913.51:** No person did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense when the amount involved was greater than \$7,500.00.

7. **SECURITIES FRAUD 1707.44 (B)(4):** No person shall knowingly make or cause to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, when selling any securities in Ohio when the amount exceeded one hundred thousand dollars.

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

The Grand Jury further finds that this Enterprise and the Persons Associated with the Enterprise were responsible for the above-mentioned pattern of corrupt activity with regard to the following property on the following dates. The Grand Jury further finds that the following incidents directly or indirectly affected the affairs of the Enterprise:

THEFT

- 1. On or about March 8, 2010 TML Consulting LLC, Thomas Lysaght, Peter Beck and /or Vernon "Chip" Demois did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent when the amount of involved was \$500,000.00 or more. Michael Farms Inc. investment of \$500,000.00 dated March 8, 2010.**
- 2. On or about March 8, 2010 TML Consulting LLC, Thomas Lysaght, Peter Beck and /or Vernon "Chip" Demois did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by deception when the amount of involved was \$500,000.00 or more. Michael Farms Inc., investment of \$500,000.00 dated March 8, 2010.**
- 3. On or about December 24, 2007 to August 13, 2008 Peter Beck, John Fussner and Christopher Technologies LLC did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by deception when the amount of involved was \$100,000.00 or more. Peter Boland investment of \$100,000.00.**
- 4. On or about December 21, 2007 to August 13, 2008 Peter Beck, John Fussner and Christopher Technologies LLC did with purpose to deprive the owner of property or**

services, knowingly obtain or exert control over either the property or services by beyond the scope of the express or implied consent of the owner or person authorized to give consent when the amount of involved was \$100,000.00 or more. Peter Boland investment of \$100,000.00.

5. On or about December 21, 2007 to July 2, 2008 Peter Beck, John Fussner and Christopher Technologies LLC did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by deception when the amount of involved was \$100,000.00 or more . Corey Jordan victim amount of theft \$100,000.00.

6. On or about December 21, 2007 to July 2, 2008 Peter Beck, John Fussner and Christopher Technologies LLC did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by beyond the scope of the express or implied consent of the owner or person authorized to give consent when the amount of involved was \$100,000.00 or more. Corey Jordan investment of \$100,000.00 .

7. On or about July 22, 2008 Peter Beck, John Fussner and Christopher Technologies LLC did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by beyond the scope of the express or implied consent of the owner or person authorized to give consent when the amount of involved was 100,000.00 or more. Thomas and Tina Walter and the amount of \$150,000.00.

8. On or about March 24, 2008 TML Consulting LLC, Thomas Lysaght did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by deception when the amount of involved was 100,000.00. Tom

and Tina Walter investment of \$183,594.39.

9. On or about December 21, 2007 to August 1, 2008 Peter Beck, John Fussner and Christopher Technologies LLC did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by beyond the scope of the express or implied consent of the owner or person authorized to give consent when the amount of involved was \$100,000.00 or more. Robert Prangle investment of \$100,000.00.

10. On or about December 21, 2007 to August 1, 2008 Peter Beck, John Fussner and Christopher Technologies LLC did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by deception when the amount of involved was \$100,000.00 or more. Robert Prangle investment of \$100,000.00.

11. On or about July 29, 2008 John Fussner and Christopher Technologies LLC did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by beyond the scope of the express or implied consent of the owner or person authorized to give consent when the amount of involved was \$25,000.00. David Wetmore investment of \$25,000.00.

12. On or about July 29, 2008 John Fussner and Christopher Technologies LLC did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by deception when the amount of involved was \$25,000.00. David Wetmore investment of \$25,000.00.

13. On or about September 19, 2008 Tom Lysaght and TML Consulting LLC did with

purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by beyond the scope of the express or implied consent of the owner or person authorized to give consent when the amount of involved was \$25,000.00. Larry Cook investment of \$25,000.00.

14. On or about September 19, 2008, Tom Lysaght and TML Consulting LLC did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by deception when the amount of involved was \$25,000.00. Larry Cook investment of \$25,000.00.

15. On or about November 13, 2007 Tom Lysaght and TML Consulting LLC did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by beyond the scope of the express or implied consent of the owner or person authorized to give consent when the amount of involved was \$9,000.00. Karen Linder investment of \$9,000.00.

16. On or about November 13, 2007 Tom Lysaght and TML Consulting LLC did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by deception when the amount of involved was \$9,000.00. Karen Linder investment of \$9,000.00.

17. On or about February of 2005 to August 20, 2010 Tom Lysaght and TML Consulting LLC did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by beyond the scope of the express or implied consent of the owner or person authorized to give consent when the amount of involved was \$221,600.00. Linda Evans investment \$221,600.00.

18. On or about October 7, 2010 TML Consulting Inc. and or Thomas Lysaght did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by deception when the amount of involved was \$20,000.00. Richard and Clair Teagarden investment of \$20,000.00.

19. On or about August 9, 2007 to February 5, 2010 Thomas Lysaght and TML Consulting did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent when the amount of involved was \$745,000.00. Charles MBanefo investment monies.

20. On or about February 1, 2007 to November 1, 2008 Peter Beck, John Fussner did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by beyond the express or implied consent of the owner or person authorized to give consent when the amount involved was greater than \$7,500.00. Theft from the EMPLOYEE BENEFFIT PLAN: CHRISTOPHER TECHNOLOGIES LLC 401K PROFIT SHARING PLAN AND TRUST

PERJURY

21. On or about May 31, 2013, Peter Beck did in any official proceeding, did knowingly make a false statement under oath or affirmation, or knowingly swear or affirm the truth of a false statement previously made, when either statement is material. False statement about contact with Stat Surgical.

22. On or about May 31, 2013 Peter Beck did in any official proceeding, did knowingly make a false statement under oath or affirmation, or knowingly swear or affirm the truth

of a false statement previously made, when either statement is material. False statement regarding being fired or ask to leave the firm of Donahoo, Cupp and Beck.

23. On or about May 31, 2013 Peter Beck did in any official proceeding, did knowingly make a false statement under oath or affirmation, or knowingly swear or affirm the truth of a false statement previously made, when either statement is material. False statement regarding being paid by CTECH.

24. On or about May 31, 2013 Peter Beck did in any official proceeding, did knowingly make a false statement under oath or affirmation, or knowingly swear or affirm the truth of a false statement previously made, when either statement is material. False statement regarding being the CFO of CTECH when in fact he was the CFO of CTECH.

25. On or about May 31, 2013 Peter Beck did in any official proceeding, did knowingly make a false statement under oath or affirmation, or knowingly swear or affirm the truth of a false statement previously made, when either statement is material. False statement regarding meeting he had with investor Tom Walter.

26. On or about May 31, 2013 Peter Beck did in any official proceeding, did knowingly make a false statement under oath or affirmation, or knowingly swear or affirm the truth of a false statement previously made, when either statement is material. False statement by Peter Beck regarding the financial condition of CTECH to Tom Walter asking a question regarding the financial condition of CTECH.

27. On or about May 31, 2013 Peter Beck did in any official proceeding, did knowingly make a false statement under oath or affirmation, or knowingly swear or affirm the truth of a false statement previously made, when either statement is material. False statement regarding not knowing Michael Farms until after their investment of \$500,000.00

28. On or about May 31, 2013 Peter Beck did in any official proceeding, did knowingly make a false statement under oath or affirmation, or knowingly swear or affirm the truth of a false statement previously made, when either statement is material. Peter Beck made a false statement regarding a document accounting for the payouts or disbursements of the Michael Farms investment.

29. On or about May 31, 2013 Peter Beck did in any official proceeding, did knowingly make a false statement under oath or affirmation, or knowingly swear or affirm the truth of a false statement previously made, when either statement is material. Peter Beck made a false statement regarding discussing the talking points of the Michael Farms investment with DeMois, or Lysaght.

30. On or about May 31, 2013 Peter Beck did in any official proceeding, did knowingly make a false statement under oath or affirmation, or knowingly swear or affirm the truth of a false statement previously made, when either statement is material. False statement asked if he had any idea that Tom Lysaght was pitching CTECH to Michael Farms. False statement regarding an email from Chip Demois.

31. On or about May 31, 2013 Peter Beck did in any official proceeding, did knowingly make a false statement under oath or affirmation, or knowingly swear or affirm the truth of a false statement previously made, when either statement is material. False statement to Agent Leo Fernandez regarding payments he received from CTECH.

TELECOMMUNICATIONS FRAUD

32. On or about August 13, 2008 Peter Beck, John Fussner and Christopher Tech Inc. did having devised a scheme to defraud, shall knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal,

picture, sound, or image with purpose to execute or otherwise further the scheme to defraud. Peter Boland investment of \$50,000.00

33. On or about July 2, 2008, Peter Beck, John Fussner and Christopher Tech Inc. did having devised a scheme to defraud, shall knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud. Corey Jordan wire transfer of \$50,000.00.

34. On or about October 16, 2008, Tom Lysaght, Peter Beck did having devised a scheme to defraud, shall knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud. Tom and Tina Walter investment on \$13,691.36

35. On or about March 8, 2010 Peter Beck, Chip Demois, Thomas Lysaght, and TML Consulting LLC did having devised a scheme to defraud, shall knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud. Michael Farms wire transfer of \$500,000.00 to TLM Consulting LLC.

36. On or about December 21, 2007 Peter Beck, John Fussner and Christopher Technologies did having devised a scheme to defraud, shall knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing,

picture, sound, or image with purpose to execute or otherwise further the scheme to defraud. Linda Evans wire transfer of \$10,000.00

41. On or about September 16, 2009 Thomas Lysaght, and TML Consulting LLC did having devised a scheme to defraud, shall knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud. Richard and Clair Teagarden investment of \$20,000.00

42. On or about May 28, 2008 Thomas Lysaght, and TML Consulting LLC did having devised a scheme to defraud, shall knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud. Charles M. MBanefo 100,000.00 wire transfer

RECEIVING STOLEN PROPERTY

43. On or about March 8, 2010, the Friends of Pete Beck, Peter Beck, TML Consulting LLC, Thomas Lysaght, Chip DeMois, Janet Combs, and Ark by the River did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense when the amount involved in greater than \$7,500.00. Michael Farms Inc., Investment

44. On or about July 2, 2008 Christopher Technologies did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has

been obtained through commission of a theft offense when the amount involved in greater than \$7,500.00. Corey Jordan Investment.

45. On or about March 24, 2009 TMJ Consulting LLC, Tom Lysaght, and Janet Combs did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense when the amount involved in greater than \$7,500.00. Thomas and Tina Walter investment.

46. On or about December 21, 2007, Peter Beck, John Fussner, Christopher Technologies did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense when the amount involved in greater than \$7,500.00. Bob Prangle investment.

47. August 1, 2008 Peter Beck, John Fussner and Christopher Technologies Inc., did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense when the amount involved in greater than \$7,500.00. Bob Prangle investment.

48. On or about December 28, 2007 Janet Combs and Arc by the River did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense when the amount involved in greater than \$7,500.00. Larry Cook investment.

49. On or about August 23, 2008 Friends of Pete Beck, and Peter Beck did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense when the amount involved in greater than \$7,500.00. Linda Evans investment.

50. On or about August 22, 2007 Janet Combs, Ark by the River did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense when the amount involved in greater than \$7,500.00. Charles Mbanefo's investment.

51. On or about October 1, 2007 Janet Combs, Ark by the River did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense when the amount involved in greater than \$7,500.00. Charles Mbanefo's investment.

52. On or about January 4, 2008 Janet Combs, Ark by the River did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense when the amount involved in greater than \$7,500.00. Charles Mbanefo's investment.

53. On or about March 11, 2008 Thomas Lysaght did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense when the amount involved in greater than \$7,500.00. Charles Mbanefo's investment.

54. On or about April 28, 2008 Janet Combs, Ark by River did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense when the amount involved in greater than \$7,500.00. Charles Mbanefo's investment.

55. On or about May 3, 2008 Janet Combs, Ark by the River did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense when the amount involved in greater than \$7,500.00. Charles Mbanefo's investment.

SECURITIES VIOLATIONS

56. On or about July 22, 2008 Peter Beck and Christopher Tech did knowingly make or cause to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the selling of any securities in this state when the amount involved was \$150,00.00. Sale of securities to Thomas and Tina Walker

57. On or about August 1, 2008 Peter Beck did knowingly make or cause to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the selling any securities in this state when the amount involved was \$50,00.00. Sale of securities to Robert Prangle

58. On or about March 8, 2010 TML Consulting Inc., Chip DeMois, and Thomas Lysaght did knowingly make or cause to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the selling any securities in this state when the amount involved was \$500,000.00. Sale of securities to Michael Farms Inc.

59. On or about July 29, 2008 John Fussner did knowingly make or cause to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the selling any

securities in this state when the amount involved was \$25,000.00. Sale of securities to David Wetmore.

60. On or about September 19, 2008 TML Consulting Inc. and Thomas Lysaght did knowingly make or cause to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the selling any securities in this state when the amount involved was \$25,000.00. Sale of securities to Larry Cook.

61. On or about December 21, 2007 Peter Beck, John Fussner and Christopher Technologies did knowingly make or cause to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the selling any securities in this state when the amount involved was \$50,00.00. Sale of securities to Peter Boland

62. On or about August 13, 2008 Peter Beck, John Fussner and Christopher Technologies did knowingly make or cause to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the selling any securities in this state when the amount involved was \$50,00.00. Sale of securities to Peter Boland

63. On or about December 21, 2007 Peter Beck, John Fussner and Christopher Technologies did knowingly make or cause to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the selling any securities in this state when the amount involved was \$50,00.00. Sale of securities to Corey Jordan.

64. On or about September 19, 2008 Tom Lysaght, TML Consulting did knowingly make or cause to be made any false representation concerning a material and relevant fact, in

any oral statement or in any prospectus, circular, description, application, or written statement, for the selling any securities in this state when the amount involved was \$20,000.00 Richard and Claire Teagarden investment.

MONEY LAUNDERING

65. On or about March 2010 TML Consulting LLC, Peter Beck, the Friends of Pete Beck, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property. Michael Farms money.

66. On or about August 2010 TML Consulting LLC, Peter Beck, the Friends of Pete Beck, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property. Linda Evans' money.

67. On or about December 14, 2006 Janet Combs, Ark by the River did conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property. \$45,000.00

68. On or about October 1, 2007 Janet Combs, Ark by the River did conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property. \$58,000.00

69. On or about December 28, 2007 Janet Combs, Ark by the River did conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property. \$40,000.00

70. On or about September 29, 2008 Janet Combs, Ark by the River did conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property. \$48,000.00

71. On or about March 9, 2010 Janet Combs, Ark by the River did conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property. \$100,000.00.

72. On or about March 26, 2009 Janet Combs, Ark by the River did conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property. \$50,000.00

73. On or about May 20, 2008 Janet Combs, Ark by the River did conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property. \$20,000.00

ORGANIZED CRIME CONTROL ACT OF 1970

74. On or about February 1, 2007 to November 1, 2008 Peter Beck, John Fussner did by means engaging in, attempting to engage in, conspiring to engage in, or soliciting, coercing, or intimidating another person to engage in any conduct defined as "racketeering activity" under the "Organized Crime Control Act of 1970," 84 Stat. 941, 18 U.S.C. 1961(1)(B), (1)(C), (1)(D), and (1)(E), as amended specifically 18 USC 1341, 18 USC 1952, 1956 and 1957. Theft from the Christopher Technologies, LLC 401k Profit Sharing Plan and Trust in an amount greater than \$7,500.00, in violation of Section 2923.32(A)(1) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

SECOND COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 8TH day of March in the year Two Thousand and Ten** at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$150,000 or more, belonging to MICHAEL FARMS, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent, in violation of Section 2913.02(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

THIRD COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 8TH day of March in the year Two Thousand and Ten** at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$150,000 or more, belonging to MICHAEL FARMS, knowingly obtained or exerted control over such property or services by deception, in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FOURTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, from on or about the 24TH day of December in the year Two Thousand and Seven to on or about the 13TH day of August in the year Two Thousand and Eight at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$7500 or more, belonging to **PETER BOLAND**, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent, in violation of Section 2913.02(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FIFTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, from on or about the 24TH day of December in the year Two Thousand and Seven to on or about the 13TH day of August in the year Two Thousand and Eight at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$7500 or more, belonging to **PETER BOLAND**, knowingly obtained or exerted control over such property or services by deception, in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

SIXTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, from on or about the 21ST day of December in the year Two Thousand and Seven to on or about the 2ND day of July in the year Two Thousand and Eight at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$7500 or more, belonging to **COREY JORDAN**, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person

authorized to give consent, in violation of Section 2913.02(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

SEVENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 21ST day of August in the year Two Thousand and Seven to on or about the 13TH day of August in the year Two Thousand and Eight at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$7500 or more, to wit: belonging to **COREY JORDAN**, knowingly obtained or exerted control over such property or services by deception, in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

EIGHTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 22ND day of July in the year Two Thousand and Eight at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$150,000 or more, belonging to **THOMAS AND TINA WALTER**, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent, in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

NINTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, from on or about the 21ST day of December in the year Two Thousand and Seven to on or about the 1ST day of August in the year Two Thousand and Eight at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$7,500 or more, belonging to **ROBERT PRANGLEY**, knowingly obtained or exerted control over such

property or services by deception, in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, from on or about the 21ST day of December in the year Two Thousand and Seven to on or about the 1ST day of August in the year Two Thousand and Eight at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$7,500 or more, belonging to **ROBERT PRANGLEY**, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent, in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

ELEVENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 1ST day of February in the year Two Thousand and Seven to the 1ST day of November in the year Two Thousand and Eleven at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$7,500 or more, belonging to **CHRISTOPHER TECHNOLOGIES, LLC. 401k PROFIT SHARING PLAN AND TRUST**, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent, in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWELFTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 31ST day of May in the year Two Thousand and Thirteen at the County of Hamilton and State of Ohio

aforesaid, in an official proceeding, knowingly made a false statement under oath or affirmation, or knowingly swore or affirmed the truth of a false statement previously made, when either statement was material, to wit: false statement concerning reason separated from Donacho, Cupp and Beck, in violation of Section 2921.11(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

THIRTEENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 31ST day of **May in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, in an official proceeding, knowingly made a false statement under oath or affirmation, or knowingly swore or affirmed the truth of a false statement previously made, when either statement was material, to wit: false statement about receiving compensation or remuneration as the CFO of Christopher Technologies, in violation of Section 2921.11(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FOURTEENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 31ST day of **May in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, in an official proceeding, knowingly made a false statement under oath or affirmation, or knowingly swore or affirmed the truth of a false statement previously made, when either statement was material, to wit: statement about not knowing that Tom Walter was an investor when Peter Beck knew Tom Walter was an investor, in violation of Section 2921.11(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FIFTEENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 31ST day of **May in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio

aforesaid, in an official proceeding, knowingly made a false statement under oath or affirmation, or knowingly swore or affirmed the truth of a false statement previously made, when either statement was material, to wit: false statement concerning Tom Walter's investment in CTECH, in violation of Section 2921.11(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

SIXTEENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 31ST day of **May in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, in an official proceeding, knowingly made a false statement under oath or affirmation, or knowingly swore or affirmed the truth of a false statement previously made, when either statement was material, to wit: the following statement made by the defendant is false: "No. I didn't even know who Michael Farms was or -- until after the fact", in violation of Section 2921.11(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

SEVENTEENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 31ST day of **May in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, in an official proceeding, knowingly made a false statement under oath or affirmation, or knowingly swore or affirmed the truth of a false statement previously made, when either statement was material, to wit: false statement concerning involvement in talking points prior to presentation made to Michael Farms concerning convincing it to invest in CTECH, in violation of Section 2921.11(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

EIGHTEENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 31ST day of May in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **in an official proceeding, knowingly made a false statement under oath or affirmation, or knowingly swore or affirmed the truth of a false statement previously made, when either statement was material, to wit: the following statement is false: AGENT WARD: And you had no idea prior to that, Tom Lysaght was trying to pitch Christopher Technologies to them, to Michael Farms? THE WITNESS: Not to Michael Farms,** in violation of Section 2921.11(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

NINETEENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 31ST day of May in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **in an official proceeding, knowingly made a false statement under oath or affirmation, or knowingly swore or affirmed the truth of a false statement previously made, when either statement was material, to wit: the following statement is false: AGENT WARD: When did you learn about the investment from Michael Farms? THE WITNESS: After it was made,** in violation of Section 2921.11(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWENTIETH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 31ST day of May in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **in an official proceeding, knowingly made a false statement under oath or affirmation, or knowingly swore or affirmed the truth of a false statement previously made,**

when either statement was material, to wit: the following statement is false: AGENT WARD: Mr. Beck, did you receive this e-mail from Chip, do you recall, on March 31, 14 2010, "I am stunned at the use of these moneys to this date. Attached is a document from Tom used with Michael Farms. As you can see, we are both represented here in capacities and should have knowledge -- should have some knowledge of the use of the funds. The attached talking points used by Tom, how I don't know because I wasn't there, described a different use for the funds than what was -- occurred to date. I have no knowledge until today and I'm disturbed only 26 percent of the funds remain." Were you aware of this? THE WITNESS: No, I was not. I received one e-mail from Chip, the one I responded to, and then after that, I just -- I just didn't open them or read them or anything, in violation of Section 2921.11(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWENTY-FIRST COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that PETER BECK, on or about the 31ST day of May in the year Two Thousand and Thirteen at the County of Hamilton and State of Ohio aforesaid, in an official proceeding, knowingly made a false statement under oath or affirmation, or knowingly swore or affirmed the truth of a false statement previously made, when either statement was material, to wit: the following statement is false; AGENT WARD: So when these investors say they asked you flat out, the guy -- what's the guy you've known for 15 years? Bob? THE WITNESS: P.J. AGENT WARD: P.J., a person you have known for 15 years when he tells us he asked you flat out what the financial condition of the company was and you said we're fine, is that inaccurate? THE WITNESS: That's inaccurate, in violation of Section 2921.11(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWENTY-SECOND COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 8TH day of March in the year Two Thousand and Ten** at the County of Hamilton and State of Ohio aforesaid, **having devised a scheme to defraud, knowingly disseminated, transmitted, or caused to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image, with purpose to execute or otherwise further the scheme to defraud and the value of the benefit obtained by the defendant or of the detriment to the victim or victims of the fraud is \$150,000 or more but less than \$1 million**, in violation of Section 2913.05 of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWENTY-THIRD COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 13TH day of August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **having devised a scheme to defraud, knowingly disseminated, transmitted, or caused to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image, with purpose to execute or otherwise further the scheme to defraud and the value of the benefit obtained by the defendant or of the detriment to the victim or victims of the fraud is \$7,500 or more but less than \$150,000**, in violation of Section 2913.05 of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWENTY-FOURTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 2ND day of**

July in the year Two Thousand and Eight at the County of Hamilton and State of Ohio aforesaid, **having devised a scheme to defraud, knowingly disseminated, transmitted, or caused to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image, with purpose to execute or otherwise further the scheme to defraud and the value of the benefit obtained by the defendant or of the detriment to the victim or victims of the fraud is \$7,500 or more but less than \$150,000**, in violation of Section 2913.05 of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWENTY-FIFTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 16TH day of October in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **having devised a scheme to defraud, knowingly disseminated, transmitted, or caused to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image, with purpose to execute or otherwise further the scheme to defraud and the value of the benefit obtained by the defendant or of the detriment to the victim or victims of the fraud is \$7,500 or more but less than \$150,000**, in violation of Section 2913.05 of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWENTY-SIXTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 1ST day of August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **having devised a scheme to defraud, knowingly disseminated, transmitted, or caused to be disseminated or transmitted by means of a wire, radio, satellite,**

telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image, with purpose to execute or otherwise further the scheme to defraud and the value of the benefit obtained by the defendant or of the detriment to the victim or victims of the fraud is \$7,500 or more but less than \$150,000, in violation of Section 2913.05 of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWENTY-SEVENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **TML CONSULTING, LLC., on or about the 20TH day of August in the year Two Thousand and Ten** at the County of Hamilton and State of Ohio aforesaid, **having devised a scheme to defraud, knowingly disseminated, transmitted, or caused to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image, with purpose to execute or otherwise further the scheme to defraud and the value of the benefit obtained by the defendant or of the detriment to the victim or victims of the fraud is \$150,000 or more but less than \$1 million,** in violation of Section 2913.05 of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWENTY-EIGHTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **JANET S. COMBS AND ARK BY THE RIVER FELLOWSHIP MINISTRY, INC., on or about the 28TH day of April in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **did knowingly receive, retain or dispose of property worth \$7,500 or more, but less than \$150,000, knowing or having reasonable cause to believe that the property was obtained through the commission of a theft offense,** in violation of Section 2913.51(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWENTY-NINTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **JANET S. COMBS AND ARK BY THE RIVER FELLOWSHIP MINISTRY, INC.**, on or about the 3RD day of May in the year **Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **did knowingly receive, retain or dispose of property worth \$7,500 or more, but less than \$150,000, the property of CHARLES MBANEFO, knowing or having reasonable cause to believe that the property was obtained through the commission of a theft offense**, in violation of Section 2913.51(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

THIRTIETH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **JANET S. COMBS AND ARK BY THE RIVER FELLOWSHIP MINISTRY, INC.**, on or about the 24TH day of March in the year **Two Thousand and Nine** at the County of Hamilton and State of Ohio aforesaid, **did knowingly receive, retain or dispose of property worth \$7,500 or more, but less than \$150,000, the property of THOMAS AND TINA WALTER, knowing or having reasonable cause to believe that the property was obtained through the commission of a theft offense**, in violation of Section 2913.51(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

THIRTY-FIRST COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **JANET S. COMBS AND ARK BY THE RIVER FELLOWSHIP MINISTRY, INC.**, on or about the 8TH day of March in the year **Two Thousand and Ten** at the County of Hamilton and State of Ohio aforesaid, **did knowingly receive, retain or dispose of property worth \$7,500 or more, but less than \$150,000, the property of MICHAEL FARMS, knowing or having reasonable cause to believe that the**

property was obtained through the commission of a theft offense, in violation of Section 2913.51(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

THIRTY-SECOND COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 1ST day of **August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **did knowingly receive, retain or dispose of property worth \$7,500 or more, but less than \$150,000, the property of ROBERT PRANGLEY**, knowing or having reasonable cause to believe that the property was obtained through the commission of a theft offense, in violation of Section 2913.51(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

THIRTY-THIRDCOUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 22ND day of **July in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **engaged in any act or practice that violates division (A), (B), or (C) of section 1707.14 of the Revised Code, and sold securities in this state without being licensed pursuant to section 1707.16 or the Revised Code, and the value of the funds or securities involved or the loss to THOMAS AND TINA WALTER was \$150,000 or more**, in violation of Section 2913.51(A)(1) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

THIRTY-FOURTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 22ND day of **July in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **knowingly made or caused to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description,**

application, or written statement, for the purpose of selling securities in the State of Ohio, and the value of the funds or securities involved in the offense or the loss to **THOMAS AND TINA WALLTER** is **\$100,000 or more**, in violation of Section 1707.44(B)(4) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

THIRTY-FIFTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 22ND day of **July in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, did knowingly sell, cause to be sold, offer for sale, or cause to be offered for sale, any security which is not exempt under section 1707.02 of the Revised Code, nor the subject matter of one of the transactions exempted in section 1707.03, 1707.04, or 1707.34 of the Revised Code, has not been registered by coordination or qualification, and is not the subject matter of a transaction that has been registered by description, and the value of the funds or securities involved in the offense or the loss to **THOMAS AND TINA WALLTER** is **\$100,000 or more**, in violation of Section 1707.44(C)(1) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

THIRTY-SIXTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 22ND day of **July in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, who is an officer, director, or trustee of, or a dealer for, any issuer, and who knows such issuer to be insolvent in that the liabilities of the issuer exceed its assets, shall sell any securities of or for any such issuer, without disclosing the fact of the insolvency to the purchaser, and the value of the funds or securities involved in the offense or the loss to **THOMAS AND TINA WALLTER** is **\$150,000 or more**, in violation of Section 1707.44(D) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

THIRTY-SEVENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 22ND day of July in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **did in selling securities knowingly engage in any act or practice that is, in Chapter 1707 of the Ohio Revised Code, declared illegal, defined as fraudulent, or prohibited, and the value of the funds or securities involved in the offense or the loss to THOMAS AND TINA WALLTER is \$100,000 or more,** in violation of Section 1707.44(G) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

THIRTY-EIGHTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 22ND day of July in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **did purpose to deceive, shall make, issue, publish, or cause to be made, issued, or published any statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of any issuer of securities, when the person knows that the statement or advertisement is false in any material respect, and the value of the funds or securities involved in the offense or the loss to THOMAS AND TINA WALLTER is \$150,000 or more,** in violation of Section 1707.44(J) of the Ohio Revised Code and against the peace and dignity of the State of Ohio

THIRTY- NINTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 1ST day of August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **engaged in any act or practice that violates division (A), (B), or (C) of section 1707.14 of the Revised Code, and sold securities in this state without being licensed pursuant to section 1707.16 or the Revised Code, and the value of the funds or securities involved or the loss to ROBERT PRANGLEY was \$37,500 or more but less than \$150,000,**

in violation of Section 2913.51(A)(1) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FORTIETH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 1ST day of **August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **knowingly made or caused to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling securities in the State of Ohio, and the value of the funds or securities involved in the offense or the loss to THOMAS AND TINA WALLTER is \$25,000 or more but less than \$100,000**, in violation of Section 1707.44(B)(4) of the Ohio Revised Code and against the peace and dignity of the State of Ohio

FORTY-FIRST COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 1ST day of **August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **did knowingly sell, cause to be sold, offer for sale, or cause to be offered for sale, any security which is not exempt under section 1707.02 of the Revised Code, nor the subject matter of one of the transactions exempted in section 1707.03, 1707.04, or 1707.34 of the Revised Code, has not been registered by coordination or qualification, and is not the subject matter of a transaction that has been registered by description, and the value of the funds or securities involved in the offense or the loss to ROBERT PRANGLEY is \$25,000 or more but less than \$100,000**, in violation of Section 1707.44(C)(1) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FORTY-SECOND COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 1ST day of August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **who is an officer, director, or trustee of, or a dealer for, any issuer, and who knows such issuer to be insolvent in that the liabilities of the issuer exceed its assets, shall sell any securities of or for any such issuer, without disclosing the fact of the insolvency to the purchaser, and the value of the funds or securities involved in the offense or the loss to ROBERT PRANGLEY is \$37,500 or more but less than \$150,000,** in violation of Section 1707.44(D) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FORTY-THIRD COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 1ST day of August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **did in selling securities knowingly engage in any act or practice that is, in Chapter 1707 of the Ohio Revised Code, declared illegal, defined as fraudulent, or prohibited, and the value of the funds or securities involved in the offense or the loss to ROBERT PRANGLEY is \$25,000 or more but less than \$100,000,** in violation of Section 1707.44(G) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FORTY-FOURTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 1ST day of August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **did purpose to deceive, shall make, issue, publish, or cause to be made, issued, or published any statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of any issuer of securities, when the person knows that the statement or advertisement is false in any material respect, and the value of the funds or securities involved in the offense or the loss to ROBERT**

PRANGLEY is \$37,500 or more but less than \$150,000, in violation of Section 1707.44(J) of the Ohio Revised Code and against the peace and dignity of the State of Ohio

FORTY-FIFTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK and TML CONSULTING**, on or about the **8TH day of March in the year Two Thousand and Ten** at the County of Hamilton and State of Ohio aforesaid, **engaged in any act or practice that violates division (A), (B), or (C) of section 1707.14 of the Revised Code, and sold securities in this state without being licensed pursuant to section 1707.16 or the Revised Code, and the value of the funds or securities involved in the offense or the loss to MICHAEL FARMS is \$150,000 or more**, in violation of Section 2913.51(A)(1) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FORTY-SIXTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK and TML CONSULTING**, on or about the **8TH day of March in the year Two Thousand and Ten** at the County of Hamilton and State of Ohio aforesaid, **knowingly made or caused to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling securities in the State of Ohio, and the value of the funds or securities involved in the offense or the loss to MICHAEL FARMS is \$150,000 or more** in violation of Section 1707.44(B)(4) of the Ohio Revised Code and against the peace and dignity of the State of Ohio

FORTY-SEVENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK and TML CONSULTING**, on or about the **8TH day of March in the year Two Thousand and Ten** at the County of Hamilton and State of Ohio aforesaid, **did knowingly sell, cause to be sold, offer for sale, or**

cause to be offered for sale, any security which is not exempt under section 1707.02 of the Revised Code, nor the subject matter of one of the transactions exempted in section 1707.03, 1707.04, or 1707.34 of the Revised Code, has not been registered by coordination or qualification, and is not the subject matter of a transaction that has been registered by description, and the value of the funds or securities involved in the offense or the loss to **MICHAEL FARMS** is \$150,000 or more, in violation of Section 1707.44(C)(1) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FORTY-EIGHTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 8TH day of **March in the year Two Thousand and Ten** at the County of Hamilton and State of Ohio aforesaid, who is an officer, director, or trustee of, or a dealer for, any issuer, and who knows such issuer to be insolvent in that the liabilities of the issuer exceed its assets, shall sell any securities of or for any such issuer, without disclosing the fact of the insolvency to the purchaser, and the value of the funds or securities involved in the offense or the loss to **MICHAEL FARMS** is \$150,000 or more, in violation of Section 1707.44(D) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FORTY-NINTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK** and **TML CONSULTING**, on or about the 8TH day of **March in the year Two Thousand and Ten** at the County of Hamilton and State of Ohio aforesaid, did in selling securities knowingly engage in any act or practice that is, in Chapter 1707 of the Ohio Revised Code, declared illegal, defined as fraudulent, or prohibited, and the value of the funds or securities involved in the offense or the loss to **MICHAEL FARMS** is \$150,000 or more, in violation of Section 1707.44(G) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FIFTIETH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK and TML CONSULTING, on or about the 8TH day of March in the year Two Thousand and Ten** at the County of Hamilton and State of Ohio aforesaid, **did purpose to deceive, shall make, issue, publish, or cause to be made, issued, or published any statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of any issuer of securities, when the person knows that the statement or advertisement is false in any material respect, and the value of the funds or securities involved in the offense or the loss to MICHAEL FARMS is \$150,000 or more**, in violation of Section 1707.44(J) of the Ohio Revised Code and against the peace and dignity of the State of Ohio

FIFTY-FIRST COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **TML CONSULTING, LLC., on or about the 19TH day of September in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **knowingly made or caused to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling securities in the State of Ohio, and the value of the funds or securities involved in the offense or the loss to LARRY COOK is \$25,000 or more but less than \$100,000**, in violation of Section 1707.44(B)(4) of the Ohio Revised Code and against the peace and dignity of the State of Ohio

FIFTY-SECOND COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 13TH day of August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **engaged in any act or practice that violates division (A), (B), or (C) of section 1707.14 of the Revised Code, and sold securities in this state without being licensed**

pursuant to section 1707.16 or the Revised Code, and the value of the funds or securities involved in the offense or the loss to **PETER BOLAND** is \$150,000 or, in violation of Section 2913.51(A)(1) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FIFTY-THIRD COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 13TH day of **August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, knowingly made or caused to be made any false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling securities in the State of Ohio, and the value of the funds or securities involved in the offense or the loss to **PETER BOLAND** is \$25,000 or more but less than \$100,000, in violation of Section 1707.44(B)(4) of the Ohio Revised Code and against the peace and dignity of the State of Ohio

FIFTY-FOURTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 13TH day of **August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, did knowingly sell, cause to be sold, offer for sale, or cause to be offered for sale, any security which is not exempt under section 1707.02 of the Revised Code, nor the subject matter of one of the transactions exempted in section 1707.03, 1707.04, or 1707.34 of the Revised Code, has not been registered by coordination or qualification, and is not the subject matter of a transaction that has been registered by description, and the value of the funds or securities involved in the offense or the loss to **PETER BOLAND** is \$25,000 or more but less than \$100,000,, in violation of Section 1707.44(C)(1) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FIFTY-FIFTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 13TH day of August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, who is an officer, director, or trustee of, or a dealer for, any issuer, and who knows such issuer to be insolvent in that the liabilities of the issuer exceed its assets, shall sell any securities of or for any such issuer, without disclosing the fact of the insolvency to the purchaser, and the value of the funds or securities involved in the offense or the loss to **PETER BOLAND is \$37,500 or more but less than \$150,000**, in violation of Section 1707.44(D) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FIFTY-SIXTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 13TH day of August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, did in selling securities knowingly engage in any act or practice that is, in Chapter 1707 of the Ohio Revised Code, declared illegal, defined as fraudulent, or prohibited, and the value of the funds or securities involved in the offense or the loss to **PETER BOLAND is \$25,000 or more but less than \$100,000**, in violation of Section 1707.44(G) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FIFTY-SEVENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK, on or about the 13TH day of August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, did purpose to deceive, shall make, issue, publish, or cause to be made, issued, or published any statement or advertisement as to the value of securities, or as to alleged facts affecting the value of securities, or as to the financial condition of any issuer of securities, when the person knows that the statement or advertisement is false in any material respect, and the value of the funds or securities involved in the offense or the loss to **PETER**

BOLAND is \$37,500 or more but less than \$150,000, in violation of Section 1707.44(J) of the Ohio Revised Code and against the peace and dignity of the State of Ohio

FIFTY-EIGHTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 10TH day of **March in the year Two Thousand and Ten** at the County of Hamilton and State of Ohio aforesaid, **did conduct or attempt to conduct a transaction knowing that the property involved in the transaction were the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law**, in violation of Section 1315.55(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FIFTY-NINTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **PETER BECK**, on or about the 20TH day of **August in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **did conduct or attempt to conduct a transaction knowing that the property involved in the transaction were the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law**, in violation of Section 1315.55(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

SIXTIETH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **JANET COMBS AND ARK BY THE RIVER**, on or about the 29TH day of **September in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **did conduct or attempt to conduct a transaction**

knowing that the property involved in the transaction were the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law, in violation of Section 1315.55(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

SIXTY-FIRST COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **JANET COMBS AND ARK BY THE RIVER**, on or about the 9TH day of March in the year Two Thousand and Ten at the County of Hamilton and State of Ohio aforesaid, **did conduct or attempt to conduct a transaction knowing that the property involved in the transaction were the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law**, in violation of Section 1315.55(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

SIXTY-SECOND COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **JANET COMBS AND ARK BY THE RIVER**, on or about the 26TH day of March in the year Two Thousand and Nine at the County of Hamilton and State of Ohio aforesaid, **did conduct or attempt to conduct a transaction knowing that the property involved in the transaction were the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law**, in violation of

Section 1315.55(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

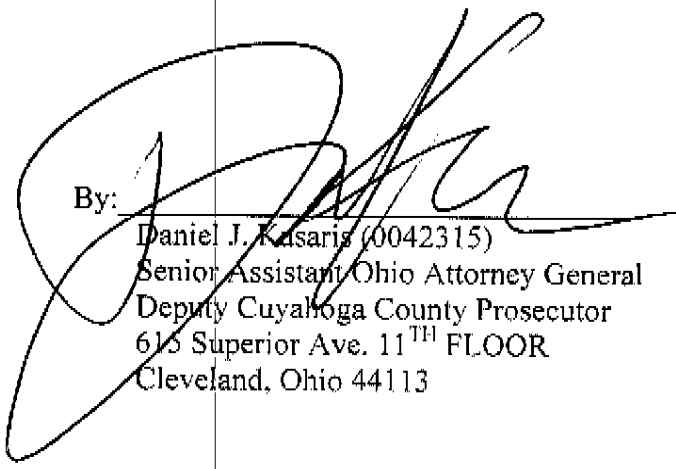
SIXTY-THIRD COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **JANET COMBS AND ARK BY THE RIVER, on or about the 20TH day of May in the year Two Thousand and Eight** at the County of Hamilton and State of Ohio aforesaid, **did conduct or attempt to conduct a transaction knowing that the property involved in the transaction were the proceeds of some form of unlawful activity with the intent to conceal or disguise the nature, location, source, ownership, or control of the property or the intent to avoid a transaction reporting requirement under section 1315.53 of the Revised Code or federal law**, in violation of Section 1315.55(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FORFEITURE SPECIFICATION 2941.1417

The Grand Jurors further find and specify that the defendants are the owners and/or possessors of real estate located at 5100 Shattuck Drive, Cincinnati, Ohio 45208 being parcel numbers as recorded in the Office of the Hamilton County Recorder, to wit: 018-0003-0135-00, 018-0003-0004-00, 020-0003-0117-00, 020-003-0116-00, 020-003-0115-00, which is contraband and/or property derived from or through the commission or facilitation of an offense, and/or is an instrumentality the offenders used or intended to use in the commission or facilitation of a felony offense.

Reported and filed this

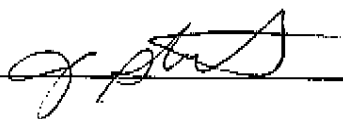
By: 

Daniel J. Kasaris (0042315)
 Senior Assistant Ohio Attorney General
 Deputy Cuyahoga County Prosecutor
 615 Superior Ave. 11TH FLOOR
 Cleveland, Ohio 44113

13 Day of 02, A.D.14

By: **Tracy Winkler**
 Clerk of Hamilton County
 Common Pleas

A TRUE BILL

By: 
 Deputy

By: 
 Foreperson, Grand Jury