

Cuyahoga County Court of Common Pleas
Criminal Court Division

State of Ohio, Plaintiff		A True Bill Indictment For
VS.		Engaging In A Pattern Of Corrupt Activity
Bobby Thompson	Blanca Contreras, Defendants	§2923.32(A)(1)
		2 Additional Count(s) 545577B
Dates of Offense (on or about) 04/23/2003 to 09/24/2010	The Term Of September of 2010	Case Number 543025-10-CR

The State of Ohio, }
Cuyahoga County } SS.

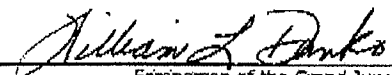
Count One	Engaging In A Pattern Of Corrupt Activity §2923.32(A)(1)
Defendants	Bobby Thompson, Blanca Contreras
Date of Offense	On or about April 23, 2003 to September 24, 2010

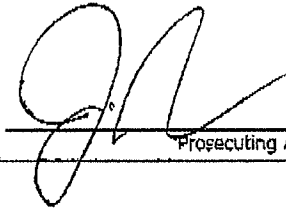
The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OHIO, do find and present, that the above named Defendant(s), on or about the date of the offense set forth above, in the County of Cuyahoga, unlawfully

On or between the 23rd day of April, 2003, and the 24th day of September, 2010, in the County of Cuyahoga, State of Ohio, or by some manner enumerated in Section 2901.12 of the Revised Code whereby proper venue is placed in Cuyahoga County, DEFENDANTS, were associated with an Enterprise, as defined in Section 2923.31(C) of the Revised Code.

This Enterprise existed separate and apart from the pattern of corrupt activity in which it engaged. In the alternative, this Enterprise is an "illicit enterprise" under O.R.C. 2932.22, whether or not this Enterprise existed separate and apart from the pattern of corrupt activity described in this Indictment.

This Enterprise functioned as a continuing unit by engaging in the diverse forms of illegal activities, as stated in this Indictment. In so doing, the DEFENDANTS NAMED BELOW are persons associated with the Enterprise who participated in and/or managed the affairs of the Enterprise, as explained in this Indictment. As such, these persons provided continuity and structure to the Enterprise in order to accomplish its illegal purposes in Ohio, and in


Foreperson of the Grand Jury


Prosecuting Attorney

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CLERK OF COURTS
CUYAHOGA COUNTY, OHIO

furtherance of the above activity as explained in this Indictment.

This Enterprise and the Persons Associated with the Enterprise were joined in purpose over a period of time, although their various roles were different in order to accomplish the main purposes of the Enterprise. These activities occurred with the knowledge and/or support of and/or were aided and abetted by each of the persons associated with the Enterprise.


The Enterprise in this matter consisted of: **Blanca Contreras, Bobby Thompson,** and Others yet unknown, each of whom did conduct or participate in, directly or indirectly, the affairs of said enterprise, to-wit: a group of persons "associated in fact" for the purposes of engaging in AGGRAVATED THEFT, and MONEY LAUNDERING through a pattern of corrupt activity as defined in Section 2923.31(I)(2)(a) or (I)(2)(c) of the Revised Code, the predicate acts constituting the pattern of corrupt activity as defined in Section 2923.31(E) of said enterprise, which include criminal violations of Ohio Revised Code TITLE 29, Aggravated Theft and TITLE 13, Money Laundering as alleged in the following COUNTS TWO and THREE of the indictment and are alleged as Predicate Acts, which are incorporated herein as if fully restated.

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

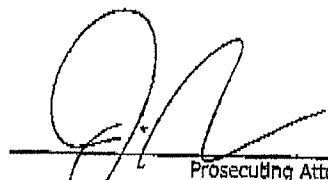
Count Two	Money Laundering §1315.55(A)(1)
Defendants	Bobby Thompson, Blanca Contreras
Date of Offense	On or about April 21, 2003 to September 24, 2010

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity..

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



Foreperson of the Grand Jury



Prosecuting Attorney

Count Three **Aggravated Theft**
§2913.02(A)(3)

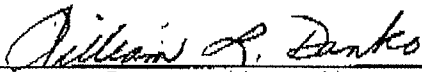
Defendants Bobby Thompson, Blanca Contreras

Date of Offense On or about April 23, 2003 to September 24, 2010

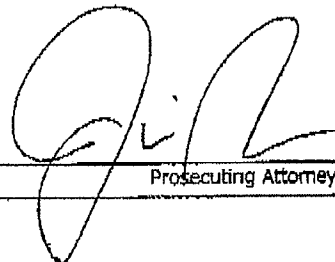
The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did with purpose to deprive the owner, numerous Ohioans, of property consisting of money or services, knowingly obtain or exert control over either the property or services by deception and the property or services stolen is valued at \$1,000,000 or more.

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



Foreperson of the Grand Jury



Prosecuting Attorney

**Cuyahoga County Court of Common Pleas
Criminal Court Division**

State of Ohio,

Plaintiff

vs.

Thompson, Bobby,

Defendant

CASE NO. 543025-10-CR

Issue Warrant for Named Defendant

Indictment For

Name Thompson, Bobby

Address

DOB 02/21/1946

SS# unknown

Description 64

Money Laundering 1315.55(A)(1)

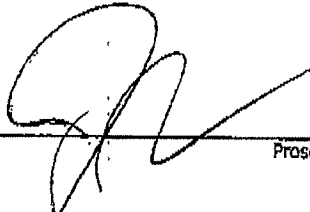
Engaging In A Pattern Of 2923.32(A)(1)
Corrupt Activity

*With Additional Counts

To the Clerk of Said Court:

Issue warrant for above named defendant.

IT IS SO ORDERED:



Prosecuting Attorney



JUDGE, COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

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OCT 13 2010
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CLERK OF COURTS
CUYAHOGA COUNTY, OHIO

MCA

**Cuyahoga County Court of Common Pleas
Criminal Court Division**

State of Ohio,

Plaintiff

CASE NO. 543025-10-CR

VS.

Contreras, Blanca,

Defendant

Issue Warrant for Named Defendant

Name Contreras, Blanca
Address

Indictment For

DOB 04/24/1972

SS# 261959287

Description, 38

Money Laundering

1315.55(A)(1)

Engaging In A Pattern Of
Corrupt Activity

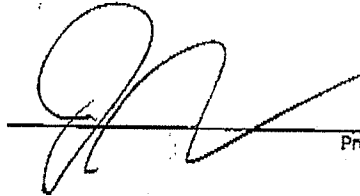
2923.32(A)(1)

*With Additional Counts

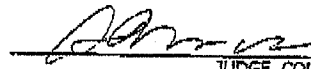
To the Clerk of Said Court:

Issue warrant for above named defendant.

IT IS SO ORDERED:



Prosecuting Attorney



JUDGE, COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

FILED
OCT 13 2010
GERALD E. FUERST
CLERK OF COURTS
CUYAHOGA COUNTY, OHIO

MCH

**Cuyahoga County Court of Common Pleas
Criminal Court Division**

State of Ohio, Plaintiff VS. Bobby Thompson	A True Bill Indictment For Engaging In A pattern Of Corrupt Activity §2923.32(A)(1) Additional Counts(s): Aggravated Theft of One Million Dollars or more; Money Laundering; Tampering with Records; Identity Fraud	
Dates of Offense (on or about) 4/23/2003 to 9/24/2010	The Term Of September of 2010	Case Number 545577-10-CR

The State of Ohio, }
 Cuyahoga County } ss.

Count One	Engaging in a Pattern of Corrupt Activity (felony 1) - R.C. 2923.32(A)(1)
Defendants	Bobby Thompson, Blanca Contreras
Date of Offense	On or about April 23, 2003 to September 24, 2010

The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, IN THE NAME BY THE AUTHORITY OF THE STATE OF OHIO, do find and present, that the above named Defendant(s), on or about the date of offense set forth above, in the County of Cuyahoga, unlawfully

during a period including April 23, 2003 to Sept. 24, 2010, in Cuyahoga County, Ohio, or by some manner enumerated in R.C. 2901.12 whereby proper venue is placed in Cuyahoga County, the Defendants while employed by, or associated with, an enterprise, as defined in R.C. 2923.31(C) did conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity, and at least one of the incidents of corrupt activity was a felony of the first, second, or third degree.

The enterprise existed separate and apart from the pattern of corrupt activity in which it engaged, or in the alternative, was an "illicit enterprise" under R.C. 2923.32, whether or not it existed separate and apart from the pattern of corrupt activity.

The enterprise in this matter was known as United States Navy Veterans Assoc. and consisted of Bobby Thompson, Blanca Contreras, and others, each of whom participated, directly or indirectly the affairs of the enterprise for the purpose of engaging in theft, aggravated theft, money laundering and tampering with records, through a pattern of corrupt activity as defined in R.C. 2923.31(E) and which include violations of R.C. 2913.02, R.C. 1315.55, and R.C. 2913.42 as alleged in Counts 2 through 21 of this indictment, all of which are alleged as predicate acts.

William J. Danko
 Foreperson of the Grand Jury

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Prosecuting Attorney (Special Prosecutor)
 Richard Cordray, Ohio Attorney General
 By: Jim Slagle (0032380), Chief, Criminal Justice Section
 160 E. Gay St., 16th Fl, Columbus, Ohio 43215
 614-644-7233

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 DEP.

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

Count Two **Aggravated Theft of One Million Dollars or more (felony 1) – R.C. 2913.02(A)(3)**

Defendants Bobby Thompson, Blanca Contreras

Date of Offense On or about April 23, 2003 to September 24, 2010

The grand jurors, on their oaths, further find that the Defendants unlawfully

during a period including April 23, 2003 to Sept. 24, 2010, the Defendants did knowingly, with purpose to deprive the owner of property, or exert control over the property by deception. The value of the property stolen is one million dollars or more.

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

Count Three **Money laundering (felony 3) – R.C. 1315.55(A)(1)**

Defendants Bobby Thompson

Date of Offense On or about January 24, 2008

The grand jurors, on their oaths, further find that the Defendant unlawfully

on or about January 24, 2008, the Defendant 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.

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

Count Four **Money laundering (felony 3) – R.C. 1315.55(A)(1)**

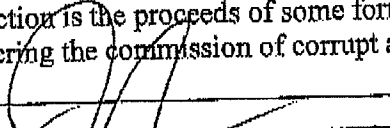
Defendants Bobby Thompson

Date of Offense On or about Feb. 21, 2008

The grand jurors, on their oaths, further find that the Defendant unlawfully

on or about Feb. 21, 2008, the Defendant 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.


Foreperson of the Grand Jury


Prosecuting Attorney (Special Prosecutor)
Richard Cordray, Ohio Attorney General
By: Jim Slagle (0032360), Chief, Criminal Justice Section
150 E. Gay St., 16th Fl, Columbus, Ohio 43215
614-644-7233

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

Count Five **Money laundering (felony 3) – R.C. 1315.55(A)(1)**

Defendants Bobby Thompson

Date of Offense On or about Sept. 18, 2008

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

on or about Sept. 18, 2008 the Defendant 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.

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

Count Six **Money laundering (felony 3) – R.C. 1315.55(A)(1)**

Defendants Bobby Thompson

Date of Offense On or about Aug. 26, 2009

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

on or about Aug. 26, 2009, the Defendant 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.

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

Count Seven **Money laundering (felony 3) – R.C. 1315.55(A)(1)**

Defendants Bobby Thompson, Blanca Contreras

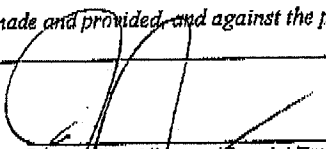
Date of Offense On or about June 15, 2009

The grand jurors, on their oaths, further find that the Defendants unlawfully

on or about June 15, 2009, the Defendants 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.

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


Foreperson of the Grand Jury


Prosecuting Attorney (Special Prosecutor)
Richard Cordray, Ohio Attorney General
By: Jim Slagle (0032360), Chief, Criminal Justice Section
150 E. Gay St., 16th Fl, Columbus, Ohio 43215
614-644-7233

Count Eight **Money laundering (felony 3) – R.C. 1315.55(A)(1)**

Defendants Bobby Thompson, Blanca Contreras

Date of Offense On or about April 12, 2010

The grand jurors, on their oaths, further find that the Defendants unlawfully

on or about April 12, 2010, the Defendants 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.

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

Count Nine **Money laundering (felony 3) – R.C. 1315.55(A)(1)**

Defendants Bobby Thompson, Blanca Contreras

Date of Offense On or about April 26, 2010

The grand jurors, on their oaths, further find that the Defendants unlawfully

on or about April 26, 2010, the Defendants 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.

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

Count Ten **Money laundering (felony 3) – R.C. 1315.55(A)(1)**

Defendants Bobby Thompson, Blanca Contreras

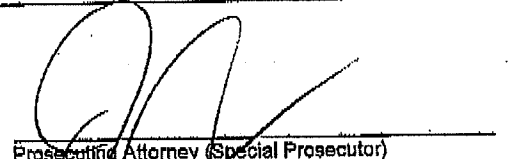
Date of Offense On or about May 3, 2010

The grand jurors, on their oaths, further find that the Defendants unlawfully

on or about May 3, 2010, the Defendants 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.

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


 Foreperson of the Grand Jury


 Prosecuting Attorney (Special Prosecutor)
 Richard Gordray, Ohio Attorney General
 By: Jim Slagle (0032360), Chief, Criminal Justice Section
 150 E. Gay St., 18th Fl, Columbus, Ohio 43215
 614-644-7233

Count Eleven **Money laundering (felony 3) – R.C. 1315.55(A)(3)**

Defendants Bobby Thompson, Blanca Contreras

Date of Offense On or about April 14, 2008

The grand jurors, on their oaths, further find that the Defendants unlawfully

on or about April 14, 2008, the Defendants did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity.

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

Count Twelve **Money laundering (felony 3) – R.C. 1315.55(A)(3)**

Defendants Bobby Thompson, Blanca Contreras

Date of Offense On or about February 23, 2009

The grand jurors, on their oaths, further find that the Defendants unlawfully

on or about February 23, 2009, the Defendants did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity.

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

Count Thirteen **Money laundering (felony 3) – R.C. 1315.55(A)(3)**

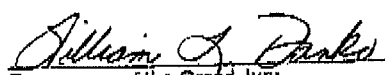
Defendants Bobby Thompson, Blanca Contreras


Date of Offense On or about January 25, 2010

The grand jurors, on their oaths, further find that the Defendants unlawfully

on or about January 25, 2010, the Defendants did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity.

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


 Foreperson of the Grand Jury


 Prosecuting Attorney (Special Prosecutor)
 Richard Cordray, Ohio Attorney General
 By: Jim Slagle (0032360), Chief, Criminal Justice Section
 150 E. Gay St., 16th Fl, Columbus, Ohio 43215
 614-644-7233

Count Fourteen **Money laundering (felony 3) – R.C. 1315.55(A)(3)**

Defendants Bobby Thompson, Blanca Contreras

Date of Offense On or about March 8, 2010

The grand jurors, on their oaths, further find that the Defendants unlawfully

on or about March 8, 2010, the Defendants did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity.

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

Count Fifteen **Money laundering (felony 3) – R.C. 1315.55(A)(3)**

Defendants Bobby Thompson, Blanca Contreras

Date of Offense On or about May 3, 2010

The grand jurors, on their oaths, further find that the Defendants unlawfully

on or about May 3, 2010, the Defendants did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity.

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

Count Sixteen **Tampering with Records (felony 3) – R.C. 2913.42(A)(2)**

Defendants Bobby Thompson

Date of Offense On or about August 8, 2005

The grand jurors, on their oaths, further find that the Defendant unlawfully

on or about August 8, 2005, the Defendant knowing that he had no privilege to do so, and with purpose to defraud or knowing that he was facilitating a fraud, did utter a writing or record, knowing it to have been tampered with as provided in R.C. 2913.42(A)(1), specifically the record was falsified. The writing, data or record is kept by or belongs to a local, state, or federal governmental entity.

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

William A. Drake
 Foreperson of the Grand Jury

[Signature]
 Prosecuting Attorney (Special Prosecutor)
 Richard Cordray, Ohio Attorney General
 By: Jim Slagle (0032360), Chief, Criminal Justice Section
 150 E. Gay St., 16th Fl, Columbus, Ohio 43215
 614-644-7233

Count Seventeen **Tampering with Records (felony 3) – R.C. 2913.42(A)(2)**

Defendants Bobby Thompson

Date of Offense On or about May 4, 2006

The grand jurors, on their oaths, further find that the Defendant unlawfully

on or about May 4, 2006, the Defendant knowing that he had no privilege to do so, and with purpose to defraud or knowing that he was facilitating a fraud, did utter a writing or record, knowing it to have been tampered with as provided in R.C. 2913.42(A)(1), specifically the record was falsified. The writing, data or record is kept by or belongs to a local, state, or federal governmental entity.

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

Count Eighteen **Tampering with Records (felony 3) – R.C. 2913.42(A)(2)**

Defendants Bobby Thompson

Date of Offense On or about April 17, 2007

The grand jurors, on their oaths, further find that the Defendant unlawfully

on or about April 17, 2007, the Defendant knowing that he had no privilege to do so, and with purpose to defraud or knowing that he was facilitating a fraud, did utter a writing or record, knowing it to have been tampered with as provided in R.C. 2913.42(A)(1), specifically the record was falsified. The writing, data or record is kept by or belongs to a local, state, or federal governmental entity.

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

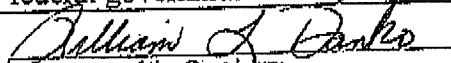
Count Nineteen **Tampering with Records (felony 3) – R.C. 2913.42(A)(2)**

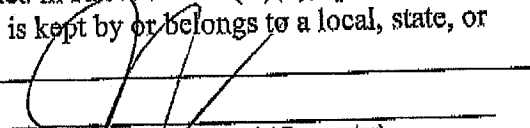
Defendants Bobby Thompson

Date of Offense On or about March 25, 2008

The grand jurors, on their oaths, further find that the Defendant unlawfully

on or about March 25, 2008, the Defendant knowing that he had no privilege to do so, and with purpose to defraud or knowing that he was facilitating a fraud, did utter a writing or record, knowing it to have been tampered with as provided in R.C. 2913.42(A)(1), specifically the record was falsified. The writing, data or record is kept by or belongs to a local, state, or federal governmental entity.


Foreperson of the Grand Jury


Prosecuting Attorney (Special Prosecutor)
Richard Gordray, Ohio Attorney General
By: Jim Slagle (0032360), Chief, Criminal Justice Section
150 E. Gay St., 16th Fl, Columbus, Ohio 43215
614-644-7233

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

Count Twenty Tampering with Records (felony 3) – R.C. 2913.42(A)(2)

Defendants Bobby Thompson

Date of Offense On or about April. 28, 2009.

The grand jurors, on their oaths, further find that the Defendant unlawfully

on or about April 28, 2009, the Defendant knowing that he had no privilege to do so, and with purpose to defraud or knowing that he was facilitating a fraud, did utter a writing or record, knowing it to have been tampered with as provided in R.C. 2913.42(A)(1), specifically the record was falsified. The writing, data or record is kept by or belongs to a local, state, or federal governmental entity.

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

Count Twenty One Tampering with Records (felony 3) – R.C. 2913.42(A)(2)

Defendants Bobby Thompson, Blanca Contreras


Date of Offense On or about April 20, 2010

The grand jurors, on their oaths, further find that the Defendants unlawfully

on or about April 20, 2010, the Defendants knowing that they had no privilege to do so, and with purpose to defraud or knowing that they were facilitating a fraud, did utter a writing or record, knowing it to have been tampered with as provided in R.C. 2913.42(A)(1), specifically the record was falsified. The writing, data or record is kept by or belongs to a local, state, or federal governmental entity.

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


Foreperson of the Grand Jury


Prosecuting Attorney (Special Prosecutor)
Richard Cordray, Ohio Attorney General
By: Jim Slagle (0032380), Chief, Criminal Justice Section
150 E. Gay St., 16th Fl, Columbus, Ohio 43215
614-644-7233

Count Twenty Two Identity Fraud (felony 5) - R.C. 2913.49(B)(2)

Defendants Bobby Thompson

Date of Offense On or about April 21, 2003 to April 6, 2010

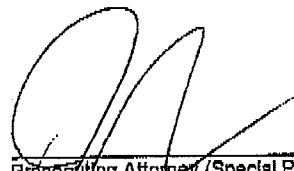
The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

during a period including April 21, 2003 to April 6, 2010, the Defendant did, without the express or implied consent of the other person, use, obtain, or possess any personal identifying information of another person with intent to represent the other person's identifying information as the defendant's own personal identifying information.

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

A True Bill.


Foreperson of the Grand Jury


Prosecuting Attorney (Special Prosecutor)
Richard Cordray, Ohio Attorney General
By: Jim Slagle (0032360), Chief, Criminal Justice Section
150 E. Gay St., 16th Fl, Columbus, Ohio 43215
614-644-7233

Thompson/Contreras – Grand Jury Outline 12/27/10

Count One Engaging in a Pattern of Corrupt Activity (felony 1) - R.C. 2923.32(A)(1)

the Defendants while employed by, or associated with, an enterprise, as defined in R.C. 2923.31(C) did conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity, and at least one of the incidents of corrupt activity was a felony of the first, second, or third degree.

Defendants Bobby Thompson, **Blanca Contreras**

Date of Offense On or about April 23, 2003 to September 24, 2010

[same as prior indictment]

Count Two Aggravated Theft of One Million Dollars or more (felony 1) – R.C. 2913.02(A)(3)

the Defendants did knowingly, with purpose to deprive the owner of property, or exert control over the property by deception. The value of the property stolen is one million dollars or more.

Defendants Bobby Thompson, **Blanca Contreras**

Date of Offense On or about April 23, 2003 to September 24, 2010

[same as prior indictment]

Count 3 - 6: Money laundering (felony 3) – R.C. 1315.55(A)(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.

Defendants Bobby Thompson

3: 1/24/08 Thompson cashes USNVA check 1655 for \$5000

4: 2/21/08 Thompson cashes USNVA check 1665 for \$5000

5: 9/18/08 Thompson cashes USNVA check 1734 for \$5000

6: 8/26/09 Thompson deposits \$50,000 in USNVA funds into personal account
(next day he writes \$50,000 check out of personal account for political contribution)

Count 7 - 10 Money laundering (felony 3) – R.C. 1315.55(A)(1)

the Defendants 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.

Defendants Bobby Thompson, **Blanca Contreras**

7: 6/15/09 Contreras cashes USNVA check 2083 for \$5,000

8: 4/12/10 Contreras cashes USNVA check 2190 for \$9,000

9: 4/26/10 Contreras cashes USNVA check 1870 for \$9,000

10: 5/3/10 Contreras cashes USNVA check 1874 for \$9,000

Count 11 – 15: Money laundering (felony 3) – R.C. 1315.55(A)(3)

the Defendants did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity.

Defendants Bobby Thompson, **Blanca Contreras**

11: 4/14/08 Patrick Bray donation - \$300

12: 2/23/09 Betty Degirolama donation - \$300

13: 1/25/10 William Flee donation - \$1,000

14: 3/8/10 Nancy Womer donation - \$100

15: 5/3/10 Marie DeCapite donation - \$150

Count 16 – 20: Tampering with Records (felony 3) – R.C. 2913.42(A)(2)

the Defendant, knowing that he had no privilege to do so, and with purpose to defraud or knowing that he was facilitating a fraud, did utter a writing or record, knowing it to have been tampered with as provided in R.C. 2913.42(A)(1), specifically the record was falsified. The writing, data or record is kept by or belongs to a local, state, or federal governmental entity.

Defendants Bobby Thompson

16: 8/8/05 – Thompson filed false Charitable Organization Statement w/ AGO

17: 5/4/06 – Thompson filed false Charitable Organization Statement w/ AGO

18: 4/17/07 – Thompson filed false Charitable Organization Statement w/ AGO

19: 3/25/08 – Thompson filed false Charitable Organization Statement w/ AGO

20: 4/28/09 – Thompson filed false Charitable Organization Statement w/ AGO

Count 21 Tampering with Records (felony 3) – R.C. 2913.42(A)(2)

the Defendants knowing that he had no privilege to do so, and with purpose to defraud or knowing that they were facilitating a fraud, did utter a writing or record, knowing it to have been tampered with as provided in R.C. 2913.42(A)(1), specifically the record was falsified. The writing, data or record is kept by or belongs to a local, state, or federal governmental entity

Defendants Bobby Thompson, **Blanca Contreras**

21: 4/20/10 – Contreras filed false Charitable Organization Statement w/ AGO

Count 22 Identity Fraud (felony 5) – R.C. 2913.49(B)(2)

Defendants Bobby Thompson

the Defendant did, without the express or implied consent of the other person, use, obtain, or possess any personal identifying information of another person with intent to represent the other person's identifying information as the defendant's own personal identifying information.

22: 4/21/03: Thompson presents false Florida ID to Cinci UPS to obtain USNVA PO Box