THE STATE OF OHIO, HAMILTON COUNTY

COURT OF COMMON PLEAS

STATE OF OHIO

Plaintiff

Case No. B 0601937

-VS-

MICHAEL GRIFFIE AND CHARLENE MONROE AND RACHETTA T JOHNSON

Defendants

PROSECUTING ATTORNEY'S REQUEST FOR ISSUANCE OF WARRANT UPON INDICTMENT

TO THE CLERK OF THE COURT OF COMMON PLEAS:

MICHAEL GRIFFIE AND CHARLENE MONROE AND RACHETTA T JOHNSON 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 warrant 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.



Joseph T. Deters Prosecuting Attorney Hamilton County, Ohio

Assistant Prosecuting Attorney

THE STATE OF OHIO, HAMILTON COUNTY

COURT OF COMMON PLEAS

THE STATE OF OHIO

Case No. B 0601937

HAMILTON COUNTY, ss:

INDICTMENT FOR:

- CT1: Aggravated Theft 2913.02(A)(3)[F3]
- CT2: Tampering with Records 2913.42(A)(1)[F3]
- CT3: Forgery 2913.31(A)(2)[F3]
- CT4: Theft 2913.02(A)(3)[F4]
- CT5: Tampering with Records
- 2913.42(A)(1)[F3]
- CT6: Forgery 2913.31(A)(2)[F4]

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

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 **MICHAEL GRIFFIE**, from on or about the 1ST day of July, Two **Thousand and Two through on or about the 31ST day of December**, Two Thousand and Three at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$100,000 or more, to wit: UNITED STATES CURRENCY AND/OR CHECKS belonging to THE INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 212 (IBEW), 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.

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 **MICHAEL GRIFFIE**, from on or about the 1ST day of July, Two Thousand and Two through on or about the 31ST day of December, Two Thousand and Three at the County of Hamilton and State of Ohio aforesaid, knowing he had no privilege to do so and with purpose to defraud or knowing he was facilitating a fraud, falsified, destroyed, removed, concealed, altered, defaced, or mutilated a writing, computer software, data, computer data or record, to wit: MARKET RECOVERY FUND FORMS USED BY THE INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 212 (IBEW) FOR WAGE REIMBURSEMENT, and the offense was committed for the purpose of devising or executing a scheme to defraud or to obtain property or services, and the value of the property or services or the loss to the victim was \$5000 or more, in violation of Section 2913.42(A)(1) 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 **MICHAEL GRIFFIE**, from on or about the 1ST day of July, Two **Thousand and Two through on or about the 31ST day of December**, Two Thousand and Three at the County of Hamilton and State of Ohio aforesaid, with purpose to defraud or knowing that he was facilitating a fraud, forged a writing, to wit: MARKET RECOVERY FUND FORMS USED BY THE INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 212 (IBEW) FOR WAGE REIMBURSEMENT so that it purported to have been executed at a time or place or with terms different from what was in fact the case, and the value of the property or services or loss to the victim was \$100,000 or more, in violation of Section 2913.31(A)(2) 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 **CHARLENE MONROE AND RACHETTA T JOHNSON**, from on or about the 1ST day of December, Two Thousand and Two through on or about the 1ST day of October, Two Thousand and Three at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$5000 or more, to wit: UNITED STATES CURRENCY AND/OR CHECKS belonging to THE INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 212 (IBEW), 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.

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 CHARLENE MONROE AND RACHETTA T JOHNSON, from on or about the 1ST day of December, Two Thousand and Two through on or about the 1ST day of October, Two Thousand and Three at the County of Hamilton and State of Ohio aforesaid, knowing they had no privilege to do so and with purpose to defraud or knowing they were facilitating a fraud, falsified, destroyed, removed, concealed, altered, defaced, or mutilated a writing, computer software, data, computer data or record, to wit: MARKET RECOVERY FUND FORMS USED BY THE INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 212 (IBEW) FOR WAGE REIMBURSEMENT, and the offense was committed for the purpose of devising or executing a scheme to defraud or to obtain property or services, and the value of the property or services or the **loss to the victim was \$5000 or more,** in violation of Section 2913.42(A)(1) 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 CHARLENE MONROE AND RACHETTA T JOHNSON, from on or about the 1ST day of December, Two Thousand and Two through on or about the 1ST day of October, Two Thousand and Three at the County of Hamilton and State of Ohio aforesaid, with purpose to defraud or knowing that he was facilitating a fraud, forged a writing, to wit: MARKET RECOVERY FUND FORMS USED BY THE INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 212 (IBEW) FOR WAGE REIMBURSEMENT so that it purported to have been executed at a time or place or with terms different from what was in fact the case, and the value of the property or services or loss to the victim was \$5000 or more but less than \$100,000 to wit: UNITED STATES CURRENCY AND/OR CHECKS, in violation of Section 2913.31(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

Joseph T. Deters Prosecuting Attorney Hamilton County, Ohio

Reported and filed this

By

Assistant Prosecuting Attorney

30th day of March A.D. 2006

By: **Gregory Hartmann** Clerk of Hamilton County Common Pleas

By: Deput

Foreperson, Grand Jury

A TRUE BILL

By: