# IN THE COURT OF COMMON PLEAS PIKE COUNTY, OHIO

STATE OF OHIO,	*	Case No. 2019CR000068
Plaintiff	*	
	, <b>*</b>	
Vs.	*	Judge Chris A. Martin
	*	
Charles S. Reader,	*	SUPERSEDING INDICTMENT
Defendant	*	

The jurors of the Grand Jury of the State of Ohio, within and for the body of the County of Pike, on their oaths, in the name and by the authority of the State of Ohio, do find and present that:

## **COUNT ONE**

CHARLES READER, between June 22, 2017 and December 20, 2018, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, while employed by, or associated with an enterprise, to wit: The Pike County Sheriff's office, did conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity, to wit: did engage in various acts of theft, in violation of R.C. 2913.02, receiving stolen property, in violation of R.C. 2913.51, tampering with records, in violation of R.C. 2913.42, tampering with evidence, in violation of R.C. 2921.12, and theft in office, in violation of R.C. 2921.41, including, but not limited to the acts alleged in the conduct set out in this Indictment in Counts Two through Nine, Twelve, Thirteen, Fifteen, and Sixteen of this Indictment, inclusive, as if fully rewritten herein, when the proceeds of the violation, the payments made in the violation, the amount of a claim for payment or for any other benefit that is false or deceptive and that is involved in COMMON PLEAS COURT and the violation, or when the total of any of the above proceeds, payments or claim for

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payment or other benefit in any combination of violations exceeds one thousand dollars (\$1,000.00), in violation of Section 2923.32(A)(1) of the Ohio Revised Code.

Engaging in a Pattern of Corrupt Activity- A felony of the first degree

#### **COUNT TWO**

CHARLES READER, between June 22, 2017 and December 20, 2018, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, in his capacity as a public official, to wit: Sheriff of Pike County, Ohio, did knowingly commit a theft offense, to wit: theft, in violation of R.C. 2913.02, and/or receiving stolen property, in violation of R.C. 2913.51, and/or tampering with records, in violation of R.C. 2913.42, CHARLES READER having used his office in aid of committing the offense, when the value of the property or services stolen is one thousand dollars (\$1,000.00) or more and is less than seven thousand five hundred dollars (\$7,500.00), in violation of Section 2921.41(A)(1) of the Ohio Revised Code.

Theft in Office- A felony of the fourth degree

# **COUNT THREE**

CHARLES READER, between July 22, 2017 and December 20, 2018, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, in his capacity as a public official, to wit: Sheriff of Pike County, Ohio, did knowingly commit a theft offense, to wit: theft, in violation of R.C. 2913.02, and/or receiving stolen property, in violation of R.C. 2913.51, and/or tampering with records, in violation of R.C. 2913.51, and/or tampering with records, in violation of R.C.

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CHARLES READER having used his office in aid of committing the offense, when the value of the property or services stolen is one thousand dollars (\$1,000.00) or more and is less than seven thousand five hundred dollars (\$7,500.00), in violation of Section 2921.41(A)(1) of the Ohio Revised Code.

Theft in Office- A felony of the fourth degree

## **COUNT FOUR**

CHARLES READER, on or about December 20, 2018, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, knowing that an official proceeding or investigation was in progress, or is about to be or likely to be instituted, did make, present, or use any record, document, or thing, to wit: an evidence bag dated 09-19-2017 containing \$7,000.00 in United State currency, knowing it to be false and with purpose to mislead a public official who is or may be engaged in such proceeding or investigation, or with purpose to corrupt the outcome of any such Code.

Tampering with Evidence- A felony of the third degree

COUNT FIVE

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CHARLES READER, between September 19, 2017 and December 20, 2018, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, in his capacity as a public official, to wit: Sheriff of Pike County, Ohio, did knowingly

commit a theft offense, to wit: theft, in violation of R.C. 2913.02, and/or receiving stolen property, in violation of R.C. 2913.51, and/or tampering with records, in violation of R.C. 2913.42, CHARLES READER having used his office in aid of committing the offense, when the value of the property or services stolen is one thousand dollars (\$1,000.00) or more and is less than seven thousand five hundred dollars (\$7,500.00), in violation of Section 2921.41(A)(1) of the Ohio Revised Code.

Theft in Office- A felony of the fourth degree

#### **COUNT SIX**

CHARLES READER, on or about December 20, 2018, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, knowing that an official proceeding or investigation was in progress, or is about to be or likely to be instituted, did make, present, or use any record, document, or thing, to wit: an evidence bag dated 03-09-2018 containing \$621.00 in United State currency, knowing it to be false and with purpose to mislead a public official who is or may be engaged in such proceeding or investigation, or with purpose to corrupt the outcome of any such proceeding or investigation in violation of Section 2921.12(A)(2) of the Ohio Revised Code.

Tampering with Evidence- A felony of the third degree

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#### **COUNT SEVEN**

CHARLES READER, between March 9, 2018 and December 20, 2018, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, in his capacity as a public official, to wit: Sheriff of Pike County, Ohio, did knowingly commit a theft offense, to wit: theft, in violation of R.C. 2913.02, and/or receiving stolen property, in violation of R.C. 2913.51, and/or tampering with records, in violation of R.C. 2913.42, CHARLES READER having used his office in aid of committing the offense, when the value of the property or services stolen is one thousand dollars (\$1,000.00) or more and is less than seven thousand five hundred dollars (\$7,500.00), in violation of Section 2921.41(A)(1) of the Ohio Revised Code.

Theft in Office- A felony of the fifth degree

#### **COUNT EIGHT**

CHARLES READER, on or about August 19, 2017, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, in his capacity as a public official, to wit: Sheriff of Pike County, Ohio, did recklessly use or authorize the use of the authority or influence of his office to secure a thing of value, to wit: a 2013 Nissan Versa, that thing of value being of such character as to manifest a substantial and improper influence upon CHARLES READER with respect to his duties, in violation of Section 102.03(D) of the Ohio Revised Code.

Conflict of Interest- A misdemeanor of the first degree

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#### COUNT NINE

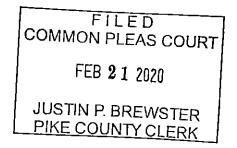
CHARLES READER, during a period of time beginning August 19, 2017 through November 9, 2017, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, by deception, did cause another to execute a writing, to wit: title to a 2013 Nissan Versa, that disposed of or encumbered property, the value of the property or the obligation involved being one thousand dollars (\$1,000.00) of more and less than seven thousand five hundred dollars (\$7,500.00) in violation of Section 2913.43(A) of the Ohio Revised Code.

Securing Writings by Deception- A felony of the fifth degree

#### **COUNT TEN**

CHARLES READER, between June 22, 2017 and December 20, 2018, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, and with purpose to deprive the owner of property or services, did knowingly obtain or exert control over the said property or services by deception, when the value of the property or services stolen is seven thousand five hundred dollars (\$7,500.00) or more and is less than one hundred and fifty thousand dollars (\$150,000.00), in violation of Section 2913.02(A)(3) of the Ohio Revised Code.

Theft- A felony of the third degree



## COUNT ELEVEN

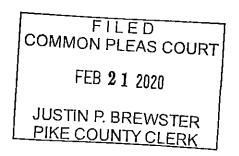
CHARLES READER, on or about August 19, 2017, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, in his capacity as a public official, to wit: Sheriff of Pike County, Ohio, did recklessly use or authorize the use of the authority or influence of his office to secure a thing of value, to wit: a 1991 Chevrolet Silverado, that thing of value being of such character as to manifest a substantial and improper influence upon CHARLES READER with respect to his duties, in violation of Section 102.03(D) of the Ohio Revised Code.

Conflict of Interest- A misdemeanor of the first degree

#### **COUNT TWELVE**

CHARLES READER, between the time period of August 19, 2017 through December 15, 2017, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, and with purpose to deprive the owner of property or services, to with a 1991 Chevrolet Silverado, did knowingly obtain or exert control over the said property or services by deception, when the property stolen was a motor vehicle, in violation of Section 2913.02(A)(3) of the Ohio Revised Code.

Theft- A felony of the fourth degree



# COUNT THIRTEEN

CHARLES READER, between the time period of August 19, 2017 through December 15, 2017, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, in his capacity as a public official, to wit: Sheriff of Pike County, Ohio, did knowingly commit a theft offense, to wit: Theft, in violation of Section 2913.02 of the Ohio Revised Code, CHARLES READER having used his office in aid of committing the offense, when the value of the property or services stolen is less than one thousand dollars (\$1,000.00), in violation of Section 2921.41(A)(1) of the Ohio Revised Code.

Theft in Office- A felony of the fifth degree

# **COUNT FOURTEEN**

CHARLES READER, on or about June 26, 2017, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, in his capacity as a public official, to wit: Sheriff of Pike County, Ohio, did recklessly solicit or accept a thing of value, to wit: did request and/or accept a loan of \$1,500.00 from William Stansberry, Jr. who, at the time, was an employee of the Pike County Sheriff's Office, that thing of value being of such character as to manifest a substantial and improper influence upon CHARLES READER with respect to his duties, in violation of Section 102.03(E) of the Ohio Revised Code.

Conflict of Interest- A misdemeanor of the first degree

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### **COUNT FIFTEEN**

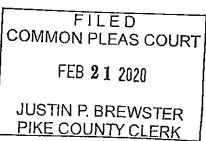
CHARLES READER, on or about October 18, 2017, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, in his capacity as a public official, to wit: Sheriff of Pike County, Ohio, did recklessly solicit or accept a thing of value, to wit: did request and/or accept a loan of \$1,000.00 from Frederick L. Foill III who, at the time, was a vendor of Pike County, that thing of value being of such character as to manifest a substantial and improper influence upon CHARLES READER with respect to his duties, in violation of Section 102.03(E) of the Ohio Revised Code.

Conflict of Interest- A misdemeanor of the first degree

# **COUNT SIXTEEN**

CHARLES READER, during a period of time beginning May 1, 2018 and ending June 30, 2018, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, in his capacity as a public official, to wit: Sheriff of Pike County, Ohio, did recklessly solicit or accept a thing of value, to wit: did request and/or accept a loan of \$2,500.00 from Ryan Bentley who, at the time, was an employee of the Pike County Sheriff's Office, that thing of value being of such character as to manifest a substantial and improper influence upon CHARLES READER with respect to his duties, in violation of Section 102.03(E) of the Ohio Revised Code.

Conflict of Interest- A misdemeanor of the first degree



#### **COUNT SEVENTEEN**

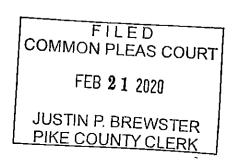
CHARLES READER, on or about August 7, 2018, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, in his capacity as a public official, to wit: Sheriff of Pike County, Ohio, did recklessly solicit or accept a thing of value, to wit: did request and/or accept a loan of \$2,000.00 from Jim Dixon who, at the time, was an employee of the Pike County Sheriff's office, that thing of value being of such character as to manifest a substantial and improper influence upon CHARLES READER with respect to his duties, in violation of Section 102.03(E) of the Ohio Revised Code.

Conflict of Interest- A misdemeanor of the first degree

## **COUNT EIGHTEEN**

CHARLES READER, on or about August 26, 2018, at the County of Pike, and in the State of Ohio, or by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Pike, in his capacity as a public official, to wit: Sheriff of Pike County, Ohio, did recklessly solicit or accept a thing of value, to wit: did request and/or accept a loan of \$2,000.00 from Frederick L. Foill III who, at the time, was a vendor of Pike County, that thing of value being of such character as to manifest a substantial and improper influence upon CHARLES READER with respect to his duties, in violation of Section 102.03(E) of the Ohio Revised Code.

Conflict of Interest- A misdemeanor of the first degree



Contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

ROBERT F. SMITH (0023434) Special Prosecuting Attorney

A True Bill:

OREPERSON OF THE GRAND JURY

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