COURT OF COMMON PLEAS BUTLER COUNTY, OHIO

STATE OF OHIO

CASE NO. CR2022-02-0162

Plaintiff

.2022 FEB -9 AM 8: 45

VS.

MARY UNDICTMENT BUTLER COUNTY CLERK OPAGERIOF 2

ROGER REYNOLDS

Defendant

STATE OF OHIO, COUNTY OF BUTLER, SS:

In the Year 2022

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:

COUNT ONE BRIBERY

Between or about at least November 08, 2019, and on or about September 17, 2021, in Butler County, Ohio, or by some manner enumerated in R.C. 2901.12, whereby venue is placed in Butler County, in a continuing course of conduct, Roger Reynolds, did knowingly solicit a thing of value or valuable benefit to corrupt or improperly influence a person or another public official with respect to the discharge of the person's or the other public servant's duty. This offense is contrary to and in violation of the form of the offense of BRIBERY, a Felony of the Third Degree, Statute R.C. 2921.02(B), and against the peace and dignity of the State of Ohio. The commission of the offense was part of a course of continuing conduct involving offenses committed in Butler County as per R.C. 2901.12.

COUNT TWO UNLAWFUL INTEREST IN A PUBLIC CONTRACT

Between on or about at least April 06, 2021, and on or about at least August 31, 2021, in Butler County, Ohio, or by some manner enumerated in R.C. 2901.12, whereby venue is placed in Butler County, in a continuing course of conduct, Roger Reynolds did authorize, or employ the authority or influence of the public official's office to secure authorization of, any public contract in which the public official, a member of public official's family, or any of the public official's business associates has an interest and/or did have an interest in the profits or benefits of a public contract entered into by or for the use of the political subdivision or governmental agency or instrumentality with which the public official is connected. This offense is contrary to and in violation of the form of the offense of UNLAWFUL INTEREST IN A PUBLIC CONTRACT, a Felony of the Fourth Degree, Statute R.C. 2921.42(A), and against the peace and dignity of the State of Ohio. The commission of the offense was part of a course of continuing conduct involving offenses committed in Butler County as per R.C. 2901.12.

COUNT THREE UNLAWFUL USE OF AUTHORITY

On or about at least October 01, 2015, through on or about at least October 31, 2017, in Butler County, Ohio, or by some manner enumerated in R.C. 2901.12, whereby venue is placed in Butler County, in a continuing course of conduct, Roger Reynolds did use or authorize the use of the authority or influence of office or employment to secure something of value. This offense is contrary to and in violation of the form of the offense of UNLAWFUL USE OF AUTHORITY, a Misdemeanor of the First Degree, Statute R.C. 102.03(D), and against the peace and dignity of the State of Ohio. The commission of the offense was part of a course of continuing conduct involving offenses committed in Butler County as per R.C. 2901.12.

COUNT FOUR HAVING AN UNLAWFUL INTEREST IN A PUBLIC CONTRACT

From between on or about at least August 1, 2015, and on or about at least September 30, 2021, in Butler County, Ohio, or by some manner enumerated in R.C. 2901.12, whereby venue is placed in Butler County, in a continuing course of conduct, Roger Reynolds did authorize, or employ the authority or influence of the public official's office to secure authorization of, any public contract in which the public official, a member of public official's family, or any of the public official's business associates has an interest and/or did have an interest in the profits or benefits of a public contract entered into by or for the use of the political subdivision or governmental agency or instrumentality with which the public official is connected. This offense is contrary to and in violation of the form of the offense of UNLAWFUL INTEREST IN A PUBLIC CONTRACT, a Felony of the Fourth Degree, Statute R.C. 2921.42(A), and against the peace and dignity of the State of Ohio. The commission of the offense was part of a course of continuing conduct involving offenses committed in Butler County as per R.C. 2901.12.

COUNT FIVE CONFLICT OF INTEREST

From between on or about at least August 01, 2021, and on or about at least October 30, 2021, in Butler County, Ohio, or by some manner enumerated in R.C. 2901.12, whereby venue is placed in Butler County, in a continuing course of conduct, Roger Reynolds did promise and/or give a public official or employee a thing of value that is of such a character as to manifest a substantial and improper influence upon the public official or employee with respect to that person's duties. This offense is contrary to and in violation of the form of the offense of CONFLICT OF INTEREST, a Misdemeanor of the First Degree, Statute R.C. 102.03(F), and against the peace and dignity of the State of Ohio. The commission of the offense was part of a course of continuing conduct involving offenses committed in Butler County as per R.C. 2901.12.

Filed	DAVE YOST, OHIO ATTORNEY GENERAL
	SPECIAL PROSESUTOR
Defendant arraigned, and pleads:	42
• , ,	BY
Guilty to this indictment	AAG BRADFORD L. TAMMARO (0030156)
	30 E. Broad Street, 23rd Floor
	Columbus, OH 43215
By	,
MARY L. SWAIN	
CLERK OF COURTS	A TRUE BILL
	$\bigwedge A \longrightarrow$
	V VAD
Ву	
Deputy	FOREFERSON, GRAND JURY

/vw