

COURT OF COMMON
PLEAS
UNION COUNTY, OHIO

2020 JUN 19 AM 11:54

Shirley D. Nicolson
CLERK

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

State of Ohio, <p style="text-align: right;">Plaintiff</p> vs. Steffen Evan Baldwin AKA Steffen Evan Finkelstein SSN: XXX-XX-5222 DOB: 10/19/1980, <p style="text-align: right;">Defendant</p>		A True Bill Indictment For Bribery - F3 §2921.02(B), 2921.02(E)
Dates of Offense (on or about) 11/05/2012 to 02/08/2020	The Term Of January of 2020	Case Number 20CB0099

The State of Ohio, }
Union County } ss.

Count 1	Bribery - F3 §2921.02(B), 2921.02(E)
Defendant	Steffen Evan Baldwin
Date of Offense	On or about May 31, 2016

In a continuing course of criminal conduct in Mahoning County, Ohio and Union County, Ohio

In the Common Pleas Court, Union County, Ohio, the Jurors of the Grand Jury of the State of Ohio, and for the body of the County aforesaid, being duly impaneled and sworn and charged to inquire of and present all offenses whatever committed within the limits of said County, and on their oaths, in the name and by the authority of the State of Ohio, do find and present that that the above named Defendant(s), on or about the date of the offense set forth above,

Len Tomlinson

Foreperson of the Grand Jury

Melissa A. Chase

Prosecuting Attorney

did knowingly solicit or accept for himself or another person any valuable thing or valuable benefit, to wit: \$1,000.00, to corrupt or improperly influence him or another public servant or party official with respect to the discharge of his or the other public servant's or party official's duty, either before or after he was elected, appointed, qualified, employed, summoned, or sworn as a public servant or party official.

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.

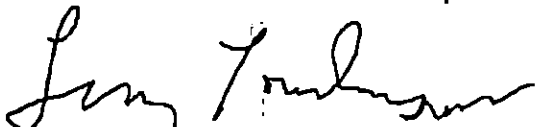
Count 2 **Telecommunications Fraud - F4**
§2913.05(A), 2913.05(B); 2913.05(C)

Defendant Steffen Evan Baldwin

Date of Offense On or about January 10, 2017 to January 14, 2017

having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud and the violation occurred as part of a course of conduct involving other violations of division (A) of this section or violations of, attempts to violate, conspiracies to violate, or complicity in violations of section 2913.02, 2913.04, 2913.11, 2913.21, 2913.31, 2913.42, 2913.43, or 2921.13 of the Revised Code and the value of the benefit obtained by the offender or of the detriment to the victim of the fraud is one thousand dollars or more but less than seven thousand five hundred dollars.

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 3 **Tampering with Records - F3**
 §2913.42(A)(1), 2913.42(B)(4)
Defendant Steffen Evan Baldwin
Date of Offense On or about April 4, 2017

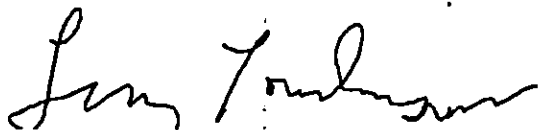
did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Union County Dog Warden and the Union County Auditor falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Application for a Dog License for Remington and the writing, data, computer software, or record was kept by or belonged 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 4 **Tampering with Records - F3**
 §2913.42(A)(2), 2913.42(B)(4)
Defendant Steffen Evan Baldwin
Date of Offense On or about April 4, 2017

did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Union County Dog Warden and the Union County Auditor utter a writing or record, to wit: Application for a Dog License for Remington, knowing it to have been tampered with as provided in division (A)(1) of this section and the writing, data, computer software, or record was kept by or belonged 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

Count 5 **Tampering with Records - F3**
 §2913.42(A)(1), 2913.42(B)(4)
Defendant Steffen Evan Baldwin
Date of Offense On or about April 4, 2017

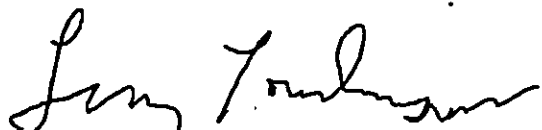
did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Union County Dog Warden and the Union County Auditor falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Application for a Dangerous Dog License and the writing, data, computer software, or record was kept by or belonged 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 6 **Tampering with Records - F3**
 §2913.42(A)(2), 2913.42(B)(4)
Defendant Steffen Evan Baldwin
Date of Offense On or about April 4, 2017

did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Union County Dog Warden and the Union County Auditor utter a writing or record, to wit: Application for a Dangerous Dog license, knowing it to have been tampered with as provided in division (A)(1) of this section and the writing, data, computer software, or record was kept by or belonged 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

Count 7 **Falsification - M1**
 §2921.13(A)(3), 2921.13(F)(1)
Defendant Steffen Evan Baldwin
Date of Offense On or about April 4, 2017 to April 13, 2017

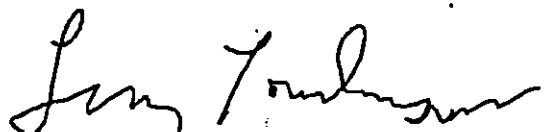
did knowingly make a false statement, or knowingly swear or affirm the truth of a false statement previously made, when the statement was made with purpose to mislead a public official in performing the public official's official function.

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 8 **Cruelty to Companion Animals - F5**
 §0959.131(E)(1), 959.99(E)(4)
Defendant Steffen Evan Baldwin
Date of Offense On or about December 28, 2016

did, as an owner, manager, or employee of a dog kennel who confined or was the custodian or caretaker of a companion animal, knowingly torture, torment, needlessly mutilate or maim, cruelly beat, poison, needlessly kill, or commit an act of cruelty against the companion animal; to wit: Remington.

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 9 **Telecommunications Fraud - F5**
 §2913.05(A), 2913.05(B); 2913.05(C)
Defendant Steffen Evan Baldwin
Date of Offense On or about April 2, 2017 to April 12, 2017

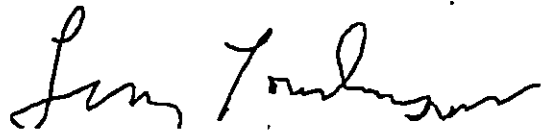
having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud and the violation occurred as part of a course of conduct involving other violations of division (A) of this section or violations of, attempts to violate, conspiracies to violate, or complicity in violations of section 2913.02, 2913.04, 2913.11, 2913.21, 2913.31, 2913.42, 2913.43, or 2921.13 of the Revised Code.

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 10 **Telecommunications Fraud - F5**
 §2913.05(A), 2913.05(C)
Defendant Steffen Evan Baldwin
Date of Offense On or about December 28, 2016 to April 16, 2017

having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.

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 11 **Telecommunications Fraud - F5**
 §2913.05(A), 2913.05(C)
Defendant Steffen Evan Baldwin
Date of Offense On or about October 10, 2016 to June 28, 2017

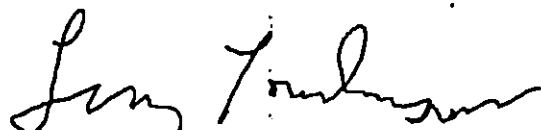
having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.

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 12 **Cruelty to Companion Animals - F5**
 §0959.131(E)(1), 959.99(E)(4)
Defendant Steffen Evan Baldwin
Date of Offense On or about October 10, 2016

did, as an owner, manager, or employee of a dog kennel who confined or was the custodian or caretaker of a companion animal, knowingly torture, torment, needlessly mutilate or maim, cruelly beat, poison, needlessly kill, or commit an act of cruelty against the companion animal, to wit: Gucci.

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 13 **Grand Theft When the Property is a Firearm or Dangerous Ordnance - F3**
 §2913.02(A)(1), 2913.02(B)(4)

Defendant Steffen Evan Baldwin

Date of Offense On or about February 8, 2018

did with purpose to deprive the owner, Animal Cruelty Task Force of Ohio or its Not-for-Profit Successor, of property or services, to wit: .45 caliber Glock Model 21, Serial No. WBX 926, knowingly obtain or exert control over either the property or services without the consent of the owner or person authorized to give consent.

Furthermore, the property stolen is a firearm or dangerous ordnance.

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.

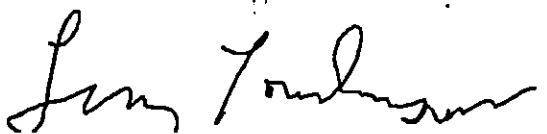
Count 14 **Impersonation of a Peace Officer or Private Police Officer - M4**
 §2921.51(B), 2921.51(G)

Defendant Steffen Evan Baldwin

Date of Offense On or about August 21, 2015 to December 15, 2015

did impersonate a peace officer, private police officer, or investigator of the bureau of criminal identification and investigation, or a federal law enforcement officer.

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 15 **Falsification - M1**
 §2921.13(A)(10), 2921.13(F)(1)
Defendant Steffen Evan Baldwin
Date of Offense On or about November 5, 2012

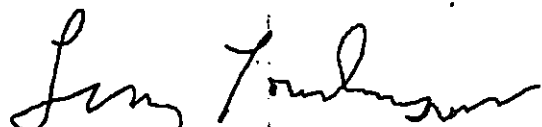
did knowingly make a false statement, or knowingly swear or affirm the truth of a false statement previously made, when the statement was knowingly made to a probate court in connection with any action, proceeding, or other matter within its jurisdiction, either orally or in a written document, including, but not limited to, an application, petition, complaint, or other pleading, or an inventory, account, or report.

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 16 **Telecommunications Fraud - F5**
 §2913.05(A), 2913.05(C)
Defendant Steffen Evan Baldwin
Date of Offense On or about February 1, 2015 to December 31, 2015

having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.

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 17 **Telecommunications Fraud - F5**
 §2913.05(A), 2913.05(C)
Defendant Steffen Evan Baldwin
Date of Offense On or about June 9, 2016 to June 30, 2016

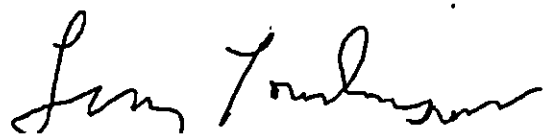
having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.

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 18 **Cruelty to Companion Animals - M1**
 §0959.131(E)(4), 959.99(E)(4)
Defendant Steffen Evan Baldwin
Date of Offense On or about June 9, 2016

was an owner, manager, or employee of a dog kennel who confines or was the custodian or caretaker of a companion animal and did negligently needlessly kill the companion animal.

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 19 **Telecommunications Fraud - F5**
 §2913.05(A), 2913.05(C)
Defendant Steffen Evan Baldwin
Date of Offense On or about February 25, 2016 to August 11, 2016

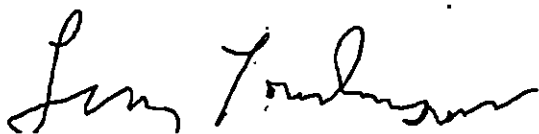
having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.

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 20 **Cruelty to Companion Animals - M1**
 §0959.131(E)(4), 959.99(E)(4)
Defendant Steffen Evan Baldwin
Date of Offense On or about December 4, 2014

was an owner, manager, or employee of a dog kennel who confines or was the custodian or caretaker of a companion animal and did negligently needlessly kill the companion animal.

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 21 **Telecommunications Fraud - F5**
 §2913.05(A), 2913.05(C)
Defendant Steffen Evan Baldwin
Date of Offense On or about June 28, 2015 to October 5, 2015

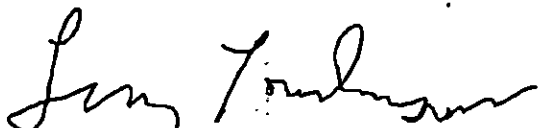
having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.

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 22 **Telecommunications Fraud - F5**
 §2913.05(A), 2913.05(C)
Defendant Steffen Evan Baldwin
Date of Offense On or about March 25, 2016 to March 25, 2017

having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.

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 23 **Cruelty to Companion Animals - M1**
§0959.131(E)(4), 959.99(E)(4)

Defendant Steffen Evan Baldwin

Date of Offense On or about March 25, 2016

was an owner, manager, or employee of a dog kennel who confines or was the custodian or caretaker of a companion animal and did negligently needlessly kill the companion animal.

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.

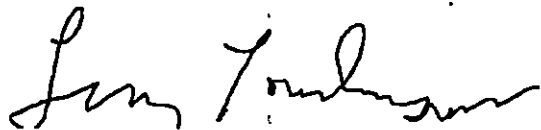
Count 24 **Tampering with Records - F3**
§2913.42(A)(1), 2913.42(B)(4)

Defendant Steffen Evan Baldwin

Date of Offense On or about August 21, 2015 to August 22, 2015

did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Union County Health Department falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Health Department bite report detailing he was bitten by Beretta and the writing, data, computer software, or record was kept by or belonged 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

Count 25 **Tampering with Records - F3**
 §2913.42(A)(2), 2913.42(B)(4)
Defendant Steffen Evan Baldwin
Date of Offense On or about August 21, 2015 to August 22, 2015

did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Union County Health Department utter a writing or record, to wit: Health Department bite report detailing Steffen Baldwin was bitten by Beretta, knowing it to have been tampered with as provided in division (A)(1) of this section and the writing, data, computer software, or record was kept by or belonged 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 26 **Telecommunications Fraud - F5**
 §2913.05(A), 2913.05(C)
Defendant Steffen Evan Baldwin
Date of Offense On or about November 23, 2015 to January 31, 2016

having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.

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 27 **Cruelty to Companion Animals - M1**

§0959.131(E)(4), 959.99(E)(4)

Defendant Steffen Evan Baldwin

Date of Offense On or about November 23, 2015

was an owner, manager, or employee of a dog kennel who confines or was the custodian or caretaker of a companion animal and did negligently needlessly kill the companion animal.

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 28 **Telecommunications Fraud - F5**

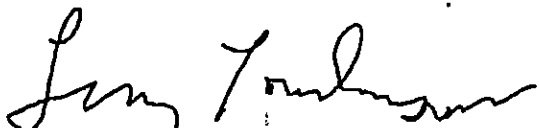
§2913.05(A), 2913.05(C)

Defendant Steffen Evan Baldwin

Date of Offense On or about August 21, 2015 to October 5, 2015

having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.

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 29 **Cruelty to Companion Animals - M1**
 §0959.131(E)(1), 959.99(E)(4)
Defendant Steffen Evan Baldwin
Date of Offense On or about April 10, 2015 to August 21, 2015

was an owner, manager, or employee of a dog kennel who confines or was the custodian or caretaker of a companion animal and did negligently commit any act by which unnecessary or unjustifiable pain or suffering is caused, permitted, or allowed to continue, when there is a reasonable remedy or relief, against the companion animal.

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 30 **Cruelty to Companion Animals - M1**
 §0959.131(E)(1), 959.99(E)(4)
Defendant Steffen Evan Baldwin
Date of Offense On or about April 23, 2015

was an owner, manager, or employee of a dog kennel who confines or was the custodian or caretaker of a companion animal and did negligently commit any act by which unnecessary or unjustifiable pain or suffering is caused, permitted, or allowed to continue, when there is a reasonable remedy or relief, against the companion animal.

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 31 **Telecommunications Fraud - F5**
 §2913.05(A), 2913.05(C)
Defendant Steffen Evan Baldwin
Date of Offense On or about August 21, 2015 to October 5, 2015


having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.

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 32 **Cruelty to Companion Animals - M1**
 §0959.131(E)(1), 959.99(E)(4)
Defendant Steffen Evan Baldwin
Date of Offense On or about April 23, 2015

was an owner, manager, or employee of a dog kennel who confines or was the custodian or caretaker of a companion animal and did negligently commit any act by which unnecessary or unjustifiable pain or suffering is caused, permitted, or allowed to continue, when there is a reasonable remedy or relief, against the companion animal.

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 33 **Cruelty to Companion Animals - M1**
§0959.131(E)(4), 959.99(E)(4)

Defendant Steffen Evan Baldwin

Date of Offense On or about August 20, 2014

was an owner, manager, or employee of a dog kennel who confines or was the custodian or caretaker of a companion animal and did negligently needlessly kill the companion animal.

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.

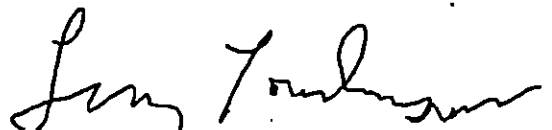
Count 34 **Cruelty to Companion Animals - M1**
§0959.131(E)(4), 959.99(E)(4)

Defendant Steffen Evan Baldwin

Date of Offense On or about July 20, 2016

was an owner, manager, or employee of a dog kennel who confines or was the custodian or caretaker of a companion animal and did negligently needlessly kill the companion animal.

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 35 **Cruelty to Companion Animals - M1**
 §0959.131(E)(1), 959.99(E)(4)
Defendant Steffen Evan Baldwin
Date of Offense On or about May 25, 2016 to July 20, 2016

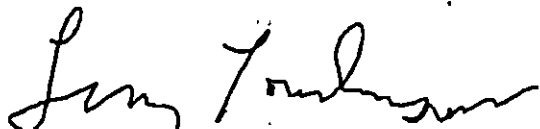
was an owner, manager, or employee of a dog kennel who confines or was the custodian or caretaker of a companion animal and did negligently commit any act by which unnecessary or unjustifiable pain or suffering is caused, permitted, or allowed to continue, when there is a reasonable remedy or relief, against the companion animal.

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 36 **Cruelty to Companion Animals - M1**
 §0959.131(E)(4), 959.99(E)(4)
Defendant Steffen Evan Baldwin
Date of Offense On or about June 8, 2015

was an owner, manager, or employee of a dog kennel who confines or was the custodian or caretaker of a companion animal and did negligently needlessly kill the companion animal.

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 37 **Telecommunications Fraud - F5**
 §2913.05(A), 2913.05(C)
Defendant Steffen Evan Baldwin
Date of Offense On or about July 5, 2015 to October 5, 2015

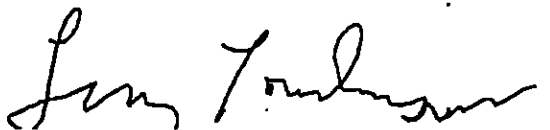
having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.

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 38 **Telecommunications Fraud - F5**
 §2913.05(A), 2913.05(C)
Defendant Steffen Evan Baldwin
Date of Offense On or about August 5, 2015 to October 5, 2015

having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud.

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

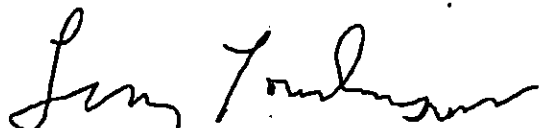


Prosecuting Attorney

Count 39 **Grand Theft - F4**
 §2913.02(A)(3), 2913.02(B)(2)
Defendant Steffen Evan Baldwin
Date of Offense On or about September 25, 2015 to February 8, 2018

In a continuing course of criminal conduct in Union County, Logan County, Mahoning County, Medina County, Licking County and Franklin County, Ohio did with purpose to deprive the owner, a number of victims including, but not limited to, No Fear Rescue, Blue Chip Rescue, Vincent Mossholder, Rascal Charities, Rascal Animal Hospital, Home Away from Home Pet Care Kennel, I Have a Dream Rescue, Medina County SPCA, and Top of Ohio Shelter, of property or services, to wit: money and services, knowingly obtain or exert control over either the property or services by deception. Furthermore, the property or services stolen is valued at seven thousand five hundred 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.



Foreperson of the Grand Jury



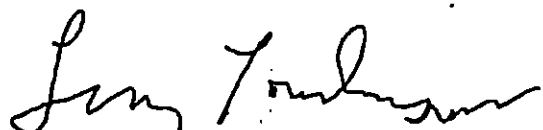
Prosecuting Attorney

Count 40 **Telecommunications Fraud - F3**
 §2913.05(A), 2913.05(B); 2913.05(C)
Defendant Steffen Evan Baldwin
Date of Offense On or about January 1, 2014 to February 8, 2020

In a continuing course of criminal conduct in Union County, Logan County, Mahoning County, Licking County, and Franklin County

having devised a scheme to defraud, did knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunication service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud and the violation occurred as part of a course of conduct involving other violations of division (A) of this section or violations of, attempts to violate, conspiracies to violate, or complicity in violations of section 2913.02, 2913.04, 2913.11, 2913.21, 2913.31, 2913.42, 2913.43, or 2921.13 of the Revised Code and the value of the benefit obtained by the offender or of the detriment to the victim of the fraud is seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

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

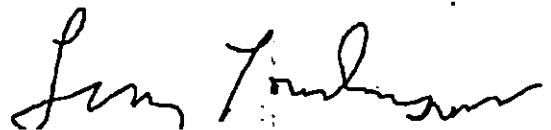
Count 41 **Grand Theft - F4**
 §2913.02(A)(2), 2913.02(B)(2)
Defendant Steffen Evan Baldwin
Date of Offense On or about January 1, 2014 to February 8, 2018

did with purpose to deprive the owner, including, but not limited to, the Animal Cruelty Task Force of Ohio and Top of Ohio Shelter of Logan County, Ohio, of property or services, to wit: cash, property and 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.

Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

In a continuing course of criminal conduct in Union County, Logan County and Franklin County, Ohio

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 42 Engaging in a Pattern of Corrupt Activity - F1
§2923.32(A)(1), 2923.32(B)(1)

Defendant Steffen Evan Baldwin

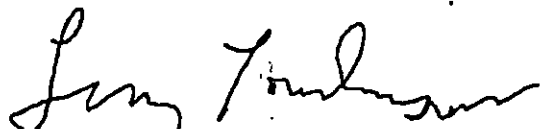
Date of Offense On or about January 1, 2014 to February 8, 2020

In a continuing course of criminal conduct in Union County, Logan County, Mahoning County, Licking County, Medina County and Franklin County, Ohio

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, to wit: Defendant, individually and on behalf of ACT of Ohio, committed theft by soliciting funds from many individuals and organizations with the funds not going for their intended purposes; committed fraud against many individuals and organizations; made numerous false statements through email and other social media accounts..

Furthermore, at least one of the incidents of corrupt activity was a felony of the first, second, or third degree, aggravated murder, or murder, or at least one of the incidents was a felony under the law of this state that was committed prior to July 1, 1996, and constituted a felony of the first, second, or third degree, aggravated murder, or murder or was committed on or after July 1, 1996, or one of the incidents of corrupt activity was a felony under the law of the United States or of another state that, if committed in this state on or after July 1, 1996, would have constituted a felony of the first, second, or third degree, aggravated murder, or murder under the law of this state, to wit: Tampering with Records, R.C. 2913.42, Bribery, R.C. 2921.02 and Grand Theft when the Property is Firearm or Dangerous Ordnance, R.C. 2913.02.

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