

The State of Ohio,  
Franklin County

} SS.

**INDICTMENT FOR: Unlawful Securities Practices (ORC 1707.44) (F3) (7 Counts); Unlawful Securities Practices (ORC 1707.44) (F3) (2 Counts); Unlawful Securities Practices (ORC 1707.44) (F3) (2 Counts); Unlawful Securities Practices (ORC 1707.44) (F1) (2 Counts); Grand Theft (ORC 2913.02) (F4) (1 Count); Unlawful Securities Practices (ORC 1707.44) (F2) (1 Count); Unlawful Securities Practices (ORC 1707.44) (F2) (1 Count); Grand Theft (ORC 2913.02) (F4) (1 Count); Unlawful Securities Practices (ORC 1707.44) (F2) (1 Count); Theft From a Person in a Protected Class (ORC 2913.02) (F3) (1 Count). Total: 19 Counts.**

**Grand Jury Term**

Beginning September 14, 2018

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**Count One            Unlawful Securities Practices, §1707.44, F3**

**Defendants**            Jeffery Luke Westerman

**Date of Offense**    On or about January 1, 2014 to December 31, 2014

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2014 to December 31, 2014, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

**Count Two            Unlawful Securities Practices, §1707.44, F3**

**Defendants**            Jeffery Luke Westerman

**Date of Offense**    On or about January 1, 2015 to December 31, 2015

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2015 to December 31, 2015, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

**Count Three      Unlawful Securities Practices, §1707.44, F3**

**Defendants**      Jeffery Luke Westerman

**Date of Offense**      On or about January 1, 2013 to December 31, 2013

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2013 to December 31, 2013, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

**Count Four      Unlawful Securities Practices, §1707.44, F3**

**Defendants**      Jeffery Luke Westerman

**Date of Offense**      On or about January 1, 2013 to December 31, 2013

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2013 to December 31, 2013, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

**Count Five      Unlawful Securities Practices, §1707.44, F3**

**Defendants**      Jeffery Luke Westerman

**Date of Offense**      On or about June 26, 2015

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about June 26, 2015, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

**Count Six            Unlawful Securities Practices, §1707.44, F3**

**Defendants**            Jeffery Luke Westerman

**Date of Offense**    On or about June 26, 2015 to December 10, 2018

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about June 26, 2015 to December 10, 2018, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, did, in purchasing or selling securities, knowingly engage in any act or practice that was, in Chapter 1707, declared illegal, defined as fraudulent, or prohibited, to wit: used IRA funds for personal expenses. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

**Count Seven        Unlawful Securities Practices, §1707.44, F3**

**Defendants**            Jeffery Luke Westerman

**Date of Offense**    On or about January 1, 2014 to December 31, 2014

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2014 to December 31, 2014, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

**Count Eight        Unlawful Securities Practices, §1707.44, F3**

**Defendants**            Jeffery Luke Westerman

**Date of Offense**    On or about January 1, 2014 to December 31, 2014

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2014 to December 31, 2014, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

**Count Nine Unlawful Securities Practices, §1707.44, F3**

**Defendants** Jeffery Luke Westerman

**Date of Offense** On or about January 1, 2013 to December 31, 2013

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2013 to December 31, 2013, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

**Count Ten Unlawful Securities Practices, §1707.44, F1**

**Defendants** Jeffery Luke Westerman

**Date of Offense** On or about January 1, 2014 to December 31, 2014

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2014 to December 31, 2014, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

**Count Eleven Unlawful Securities Practices, §1707.44, F1**

**Defendants** Jeffery Luke Westerman

**Date of Offense** On or about January 1, 2013 to December 31, 2013

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2013 to December 31, 2013, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

**Count Twelve Grand Theft, §2913.02, F4**

**Defendants** Jeffery Luke Westerman

**Date of Offense** On or about November 18, 2013 to December 31, 2013

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about November 18, 2013 to December 31, 2013, within the County of Franklin aforesaid, in violation of section 2913.02 of the Ohio Revised Code, did with purpose to deprive the owner, Rocky Moody, of property or services, to wit: cash, 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.

**Count Thirteen Unlawful Securities Practices, §1707.44, F2**

**Defendants** Jeffery Luke Westerman

**Date of Offense** On or about February 24, 2016 to August 31, 2017

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about February 24, 2016 to August 31, 2017, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

**Count Fourteen Unlawful Securities Practices, §1707.44, F2**

**Defendants** Jeffery Luke Westerman

**Date of Offense** On or about February 24, 2016 to August 31, 2017

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about February 24, 2016 to August 31, 2017, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, did, in purchasing or selling securities, knowingly engage in any act or practice that was, in Chapter 1707, declared illegal, defined as fraudulent, or prohibited, to wit: used IRA funds for personal expenses. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

**Count Fifteen      Grand Theft, §2913.02, F4**

**Defendants**            Jeffery Luke Westerman

**Date of Offense**    On or about February 24, 2016 to August 31, 2017

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about February 24, 2016 to August 31, 2017, within the County of Franklin aforesaid, in violation of section 2913.02 of the Ohio Revised Code, did with purpose to deprive the owner, Rodney Moody, of property or services, to wit: cash, 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.

**Count Sixteen      Unlawful Securities Practices, §1707.44, F2**

**Defendants**            Jeffery Luke Westerman

**Date of Offense**    On or about January 1, 2014 to December 31, 2014

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2014 to December 31, 2014, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

**Count                      Unlawful Securities Practices, §1707.44, F3**  
**Seventeen**

**Defendants**            Jeffery Luke Westerman

**Date of Offense**    On or about November 7, 2016

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about November 7, 2016, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

**Count Eighteen Unlawful Securities Practices, §1707.44, F3**

**Defendants** Jeffery Luke Westerman

**Date of Offense** On or about November 7, 2016 to December 10, 2018

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about November 7, 2016 to December 10, 2018, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, did, in purchasing or selling securities, knowingly engage in any act or practice that was, in Chapter 1707, declared illegal, defined as fraudulent, or prohibited, to wit: used investment funds for personal expenses. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

**Count Nineteen Theft From a Person in a Protected Class, §2913.02, F3**

**Defendants** Jeffery Luke Westerman

**Date of Offense** On or about November 7, 2016 to December 10, 2018

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about November 7, 2016 to December 10, 2018, within the County of Franklin aforesaid, in violation of section 2913.02 of the Ohio Revised Code, did with purpose to deprive the owner, Lawrence Lubbers, of property or services, to wit: cash, 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 victim of the offense is an elderly person, disabled adult, active duty service member, or spouse of an active duty service member and the property or services stolen is valued at seven thousand five hundred dollars or more.

All of the above conduct being contrary to the form of the statute in such cases made and provided, and against the peace and dignity of the State of Ohio.

Ron O'Brien  
Prosecuting Attorney  
Franklin County, Ohio

**A TRUE BILL**



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William J. Davies, 0071072  
Assistant Prosecuting Attorney



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Foreperson, Grand Jury



**The following is information for the Clerk of Courts only**

State of Ohio v. Jeffery Luke Westerman

Address: 804 Rosinante Road, El Paso, TX 79922

DOB: [REDACTED] 1981

Sex/Race: Male/White

Date of Arrest:

SSN: [REDACTED]

Police Agency: Ohio Department of Commerce

Municipal Reference:

ITN #:

- Count 1: Unlawful Securities Practices §1707.44, F3
- Count 2: Unlawful Securities Practices §1707.44, F3
- Count 3: Unlawful Securities Practices §1707.44, F3
- Count 4: Unlawful Securities Practices §1707.44, F3
- Count 5: Unlawful Securities Practices §1707.44, F3
- Count 6: Unlawful Securities Practices §1707.44, F3
- Count 7: Unlawful Securities Practices §1707.44, F3
- Count 8: Unlawful Securities Practices §1707.44, F3
- Count 9: Unlawful Securities Practices §1707.44, F3
- Count 10: Unlawful Securities Practices §1707.44, F1
- Count 11: Unlawful Securities Practices §1707.44, F1
- Count 12: Grand Theft §2913.02, F4
- Count 13: Unlawful Securities Practices §1707.44, F2

Count 14: Unlawful Securities Practices §1707.44, F2

Count 15: Grand Theft §2913.02, F4

Count 16: Unlawful Securities Practices §1707.44, F2

Count 17: Unlawful Securities Practices §1707.44, F3

Count 18: Unlawful Securities Practices §1707.44, F3

Count 19: Theft From a Person in a Protected Class §2913.02, F3

Case No.