

# INDICTMENT

THE STATE OF OHIO,  
Lucas County,} ss.

*Of the January, Tern of 2006, A.D.*

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, during the time period beginning March 31, 1998, and continuing through May 26, 2005, in Lucas County, Ohio, did, while employed by or associated with any enterprise, conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity in violation of §2923.32(A)(1) **OF THE OHIO REVISED CODE, ENGAGING IN A PATTERN OF CORRUPT ACTIVITY, BEING A FELONY 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.

**FORFEITURE PROVISIONS.** THE JURORS OF THE GRAND JURY further find and present the following real and personal property was used in the course of or intended to be used in the course of a violation of Revised Code Section 2923.32 (A) (1) or that the real and/or personal property was derived from or realized through conduct in violation of Revised Code Section 2923.32 (A)(1), and that **THOMAS W. NOE'S** interest therein is subject to forfeiture pursuant to Revised Code Section 2923.32 (B)(3):

1. The building and property known as 3509 Briarfield Boulevard, Maumee, Ohio, more particularly described as :

A parcel of land being part of Lot 6 of Briarfield Business Park as recorded in Volume 129, Pages 18, 19 and 20 Lucas County Plat Records, in Monclova Township, Lucas County, Ohio, said parcel of land being bounded and described as follows:

Beginning at the northwesterly corner of said Lot 6 of Briarfield Business Park; thence in a Northeasterly direction along the northerly line of said Lot 6 of Briarfield Business Park having an assumed bearing of North 78° 31' 23" East, a distance of 504.71 feet to the intersection of the easterly line of said Lot 6 of Briarfield Business Park; thence South OQo 41' 26" East along said easterly line of Lot 6 of Briarfield Business Park, a distance of 231.30 feet to a point; thence South 85° 07' 44" West along a line, a distance of 474.54 feet to the intersection of the westerly line of said Lot 6 of Briarfield Business Park, said point of intersection being a point on a curve; thence in a northerly to northwesterly direction, along an arc of curve to the left, an arc distance of 173.01 feet to the Point of Beginning, said arc of curve to the left having a radius of 1,500.68 feet, a central angle of 06° 36' 20", a chord distance of 172.91 feet and a chord bearing of North 08° 10' 26" West.

2. The business formerly known as Vintage Coins and Cards and presently known as Vintage Coins and Collectibles, a division of THOMAS W. NOE, Inc., and doing business at 3509 Briarfield Boulevard, Maumee, Ohio.
3. 5 and 89/1000 shares of voting stock in Numismatic Guaranty Corporation of America standing in the name of Thomas Noe, and 1 and 4686/10,000 shares of non-voting stock in Numismatic Guaranty Corporation of America standing in the name of Thomas Noe.

**INCIDENTS OF CORRUPT ACTIVITY.** THE JURORS OF THE GRAND JURY further find and present that **THOMAS W. NOE** has committed the incidents of corrupt activity as alleged in Counts Two through Fifty-Two of this Indictment, inclusive, and said incidents of corrupt activity are hereby incorporated by reference as if fully restated herein.

**THE ENTERPRISE.** THE JURORS OF THE GRAND JURY further find and present that the enterprise includes, but is not limited to, two or more of the following people and/or

entities associated-in-fact:

1. THOMAS W.NOE;
2. Timothy LaPointe;
3. Vintage Coins and Collectibles, formerly known as Vintage Coins and Cards;
4. Visionary Rare Coins;
5. Rare Coin Enterprises (RCE);
6. Rare Coin Alliance (RCA);
7. Errors and Oddities;
8. Spectrum Fund I;
9. Capital Coin Fund Limited;
10. Capital Coin Fund Limited n;
11. Numismatic Professionals; and/or,
12. Others unknown and/or as yet unidentified. THE JURORS OF THE GRAND JURY further

find and present the following individuals and entities, as far as is known at the time of this Indictment, were probably unwitting participants in the aforementioned enterprise:

1. Robert Bisanz
2. National Gold Exchange
3. Spectrum Numismatics
4. Lee S. Minshull
5. JohnRuss
6. Robert B. Lecce
7. Brian Hendleson

8. Henry J. Gailliott

9. Ohio Bureau of Workers' Compensation

**COMMENCEMENT OF ASSOCIATION.** THE JURORS OF THE GRAND JURY further find and present that **THOMAS W. NOE** was employed by or associated with the Enterprise beginning on or about March 31,1998.

**ENTERPRISE LIABILITY.** THE JURORS OF THE GRAND JURY further find and present that **THOMAS W. NOE** is criminally liable as a principal offender, jointly and severally, for the incidents of corrupt activity committed by the other members of the Enterprise. SECOND COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 1st day of April, 1998, in Lucas County, Ohio, with purpose to deprive the owner of property or services, did 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, and the value of the property or services stolen was Five Thousand (\$5,000.00) Dollars or more and less than One Hundred Thousand (\$100,000.00) Dollars, in violation of §2913.02(A)(2), (B)(1) **and** (B)(2) **OF THE OHIO REVISED CODE, GRAND THEFT, BEING A FELONY OF THE FOURTH DEGREE**, contrary to the form of the statute in such case made an and provided, and against the peace and dignity of the State of Ohio. THIRD COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and 4

present that **THOMAS W. NOE**, on or about the 1st day of April, 1998, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity, and/or did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit, checks number 3388, 3394, 3395 in the total amount of \$95,000.00. in violation of §1315.55(A)(1) **AND/OR (A)(3) OF THE REVISED CODE, MONEY LAUNDERING, BEING A FELONY OF THE THIRD 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. FOURTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 3rd day of April, 1998, in Lucas County, Ohio, with purpose to deprive the owner of property or services, did 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, and the value of the property or services stolen was Five Thousand (\$5,000.00) Dollars or more and less than One Hundred Thousand (\$100,000.00) Dollars, in violation of §2913.02(A)(2), (B)(1) **and (B)(2) OF THE OHIO REVISED CODE, GRAND THEFT, BEING A FELONY OF THE FOURTH DEGREE**, contrary to the form of the statute in such case made an and provided, and against the peace and dignity of the State of Ohio.

FIFTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, and the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 3rd day of April, 1998, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity, and/or did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit, checks number 3020, 3021, 3022 and 3023 in the total amount of \$21,000.00, in violation of §1315.55(A)(1) AND/OR (A)(3) OF THE REVISED CODE, MONEY LAUNDERING, BEING A FELONY OF THE THIRD 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. SIXTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 1st day of April, 1998, in Lucas County, Ohio, with purpose to deprive the owner of property or services, did 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, and the value of the property or services stolen was One Hundred Thousand (\$100,000.00) Dollars or more, in violation of §2913.02(A)(2), (B)(1) and (B)(2) OF THE OHIO REVISED CODE, AGGRAVATED THEFT, BEING A

**FELONY OF THE THIRD DEGREE**, contrary to the form of the statute in such case made an and provided, and against the peace and dignity of the State of Ohio. SEVENTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 1st day of April, 1998, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity, and/or did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit, a payment to the line of credit of Vintage Coins and Cards in the total amount of \$396,470.66, in violation of §1315.55(A)(1) **AND/OR (A)(3) OF THE REVISED CODE, MONEY LAUNDERING, BEING A FELONY OF THE THIRD 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. EIGHTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 4th day of April, 1998, in Lucas County, Ohio, with purpose to deprive the owner of property or services, did 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, and the value of the property or services stolen was Five Thousand (\$5,000.00) Dollars or more and less than One Hundred Thousand (\$100,000.00)

Dollars, in violation of §2913.02(A)(2), (B)(1) and (B)(2) **OF THE OHIO REVISED CODE, GRAND THEFT, BEING A FELONY OF THE FOURTH 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. NINTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 4th day of April, 1998, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity, and/or did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit, a payment to the line of credit of Vintage Coins and Cards in the total amount of \$50,000.00, in violation of §1315.55(A)(1) **AND/OR (A)(3) OF THE REVISED CODE, MONEY LAUNDERING, BEING A FELONY OF THE THIRD 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. TENTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 31st day of March, 1998, in Lucas County, Ohio, with purpose to deprive the owner of property or services, did knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of 8

the owner or person authorized to give consent, and the value of the property or services stolen was One Hundred Thousand (\$100,000.00) Dollars or more, in violation of §2913.02(A)(2), (B)(1) **and** (B)(2) **OF THE OHIO REVISED CODE, AGGRAVATED THEFT, BEING A FELONY OF THE THIRD DEGREE**, contrary to the form of the statute in such case made an and provided, and against the peace and dignity of the State of Ohio. ELEVENTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that THOMAS W. NOE, on or about the 31st day of March, 1998, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity, and/or did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit, check number 3387 in the total amount of \$135,000.00. in violation of §1315.55(A)(1) **AND/OR** (A)(3) **OF THE REVISED CODE, MONEY LAUNDERING, BEING A FELONY OF THE THIRD 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. TWELFTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, during the time period beginning May 1,1998, and continuing through September 15, 2003, in Lucas County, Ohio, with purpose to deprive the owner of 9

property or services, did 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, and the value of the property or services stolen was One Hundred Thousand (\$100,000.00) Dollars or more, in violation of §2913.02(A)(2), (B)(1) **and (B)(2) OF THE OHIO REVISED CODE, AGGRAVATED THEFT, BEING A FELONY OF THE THIRD DEGREE**, contrary to the form of the statute in such case made an and provided, and against the peace and dignity of the State of Ohio. THIRTEENTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, during the time period beginning May 1,1998, and continuing through September 15, 2003, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity, and/or did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit, in the total amount over \$100,000.00, in violation of§1315.55(A)(1) **AND/OR (A)(3) OF THE REVISED CODE, MONEY LAUNDERING, BEING A FELONY OF THE THIRD 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. FOURTEENTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and 10

present that **THOMAS W. NOE**, on or about the 1st day of August, 2001, in Lucas County, Ohio, with purpose to deprive the owner of property or services, did 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, and the value of the property or services stolen was Five Thousand (\$5,000.00) Dollars or more and less than One Hundred Thousand (\$100,000.00) Dollars, in violation of §2913.02(A)(2), (B)(1) **and** (B)(2) **OF THE OHIO REVISED CODE, GRAND THEFT, BEING A FELONY OF THE FOURTH 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. FIFTEENTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 1st day of August, 2001, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity, and/or did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit, check number 8561 in the total amount of \$10,000.00. in violation of §1315.55(A)(1) **AND/OR** (A)(3) **OF THE REVISED CODE, MONEY LAUNDERING, BEING A FELONY OF THE THIRD 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.

SIXTEENTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 1st day of August, 2001, in Lucas County, Ohio, with purpose to deprive the owner of property or services, did 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, and the value of the property or services stolen was One Hundred Thousand (\$100,000.00) Dollars or more. in violation of §2913.02(A)(2), (B)(1) and (B)(2) **OF THE OHIO REVISED CODE, AGGRAVATED THEFT, BEING A FELONY OF THE THIRD DEGREE**, contrary to the form of the statute in such case made an and provided, and against the peace and dignity of the State of Ohio.

SEVENTEENTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 1st day of August, 2001, did conduct or attempt to conduct a transaction, knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity, and/or did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit, a payment to the line of credit of Vintage Coins and Collectibles in the total amount of \$393,000.00, in violation of §1315.55(A)(1) **AND/OR (A)(3) OF THE REVISED CODE, MONEY LAUNDERING**,

**BEING A FELONY OF THE THIRD 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. EIGHTEENTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 1st day of August, 2001, in Lucas County, Ohio, with purpose to deprive the owner of property or services, did 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, and the value of the property or services stolen was Five Thousand (\$5,000.00) Dollars or more and less than One Hundred Thousand (\$100,000.00) Dollars, in violation of §2913.02(A)(2), (B)(1) **and (B)(2) OF THE OHIO REVISED CODE, GRAND THEFT, BEING A FELONY OF THE FOURTH 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. NINETEENTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 1st day of August, 2001, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity, and/or did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit, check number 8569 in the total amount 13

of. \$17,000.00, in violation of §1315.55(A)(1) **AND/OR (A)(3) OF THE REVISED CODE, MONEY LAUNDERING, BEING A FELONY OF THE THIRD 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. TWENTIETH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 22nd day of August, 2001, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity, and/or did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit, a transfer to Capital Coin Fund Limited in the total amount of \$786,000.00, in violation of §1315.55(A)(1) **AND/OR (A)(3) OF THE REVISED CODE, MONEY LAUNDERING, BEING A FELONY OF THE THIRD 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. > /"" ' TWENTY-FIRST COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 15th day of March, 2005, in Lucas County, Ohio, with purpose to deprive the owner of property or services, did knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of 14

the owner or person authorized to give consent, and the value of the property or services stolen was Five Hundred Thousand (\$500,000.00) Dollars or more and less than One Million (\$1,000,000.00) Dollars, in violation of §2913.02(A)(2), (B)(1) **and** (B)(1) **OF THE OHIO REVISED CODE, AGGRAVATED THEFT, BEING A FELONY OF THE SECOND 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. '

TWENTY-SECOND COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about May of 2005, in Lucas County, Ohio, knowing the person had no privilege to do so, and with purpose to defraud or knowing that the person was facilitating a fraud, did falsify, destroy, remove, conceal, alter, deface, or mutilate any writing computer software, data, computer data, or record, and the writing, data, computer software, or record is kept by or belongs to a local, state, or federal governmental entity, in violation of §2913.42(A)(1), (2) **and** (B)(4) **OF THE OHIO REVISED CODE, TAMPERING WITH RECORDS, BEING A FELONY OF THE THIRD 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.  TWENTY-THIRD COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about May of 2005, in Lucas County, Ohio, knowing the person had no privilege to do so, and with purpose to defraud or knowing that the person was facilitating a fraud, did falsify, destroy, remove, conceal, alter, deface, or mutilate any writing 15

computer software, data, computer data, or record, and the writing, data, computer software, or record is kept by or belongs to a local, state, or federal governmental entity and the value is more than One Hundred Thousand (\$100,000.00) Dollars, in violation of §2913.42(A)(1), (2) **and** (B)(3)(d) **OF THE OHIO REVISED CODE, TAMPERING WITH RECORDS, BEING A FELONY OF THE THIRD 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. TWENTY-FOURTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about June 2002, in Lucas County, Ohio, knowing the person had no privilege to do so, and with purpose to defraud or knowing that the person was facilitating a fraud, did falsify, destroy, remove, conceal, alter, deface, or mutilate any writing computer software, data, computer data, or record, and the writing, data, computer software, or record is kept by <sup>^></sup><sub>-</sub> or belongs to a local, state, or federal governmental entity, in violation of §2913.42(A)(1), (2) **and** (B)(4) **OF THE OHIO REVISED CODE, TAMPERING WITH RECORDS, BEING A FELONY OF THE THIRD 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. TWENTY-FIFTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about June 2003, in Lucas County, Ohio, knowing the person had no privilege to do so, and with purpose to defraud or knowing that the person was facilitating a fraud, did falsify, destroy, remove, conceal, alter, deface, or mutilate any writing 16

computer software, data, computer data, or record, and the writing, data, computer software, or record is kept by or belongs to a local, state, or federal governmental entity, in violation of §2913.42(A)(1), (2) **and (B)(4) OF THE OHIO REVISED CODE, TAMPERING WITH RECORDS, BEING A FELONY OF THE THIRD 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. TWENTY-SIXTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about June 2004, in Lucas County, Ohio, knowing the person had no privilege to do so, and with purpose to defraud or knowing that the person was facilitating a fraud, did falsify, destroy, remove, conceal, alter, deface, or mutilate any writing computer software, data, computer data, or record, and the writing, data, computer software, or record is kept by or belongs to a local, state, or federal governmental entity, in violation of §2913.42(A)(1), (2) **and (B)(4) OF THE OHIO REVISED CODE, TAMPERING WITH RECORDS, BEING A FELONY OF THE THIRD 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. TWENTY-SEVENTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about June 2002, in Lucas County, Ohio, knowing the person had no privilege to do so, and with purpose to defraud or knowing that the person was facilitating a fraud, did falsify, destroy, remove, conceal, alter, deface, or mutilate any writing computer software, data, computer data, or record, and the writing, data, computer software, or 17

record and the value is more than One Hundred Thousand (\$100,000.00) Dollars, in violation of §2913.42(A)(1), (2) **and** (B)(3)(d) **OF THE OHIO REVISED CODE, TAMPERING WITH RECORDS, BEING A FELONY OF THE THIRD 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.

"-• ^ TWENTY-EIGHTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about June 2003, in Lucas County, Ohio, knowing the person had no privilege to do so, and with purpose to defraud or knowing that the person was facilitating a fraud, did falsify, destroy, remove, conceal, alter, deface, or mutilate any writing computer software, data, computer data, or record, and the writing, data, computer software, or record and the value is more than One Hundred Thousand (\$100,000.00) Dollars, in violation of §2913.42(A)(1), (2) **and** (B)(3)(d) **OF THE OHIO REVISED CODE, TAMPERING WITH RECORDS, BEING A FELONY OF THE THIRD 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. TWENTY-NINTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about June 2004, in Lucas County, Ohio, knowing the person had no privilege to do so, and with purpose to defraud or knowing that the person was facilitating a fraud, did falsify, destroy, remove, conceal, alter, deface, or mutilate any writing computer software, data, computer data, or record, and the writing, data, computer software, or record and the value is more than One Hundred Thousand (\$100,000.00) Dollars, in violation of

§2913.42(A)(1), (2) and (B)(3)(d) OF THE OHIO REVISED CODE, TAMPERING WITH RECORDS, BEING A FELONY OF THE THIRD 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. THIRTIETH  
COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, during the time period beginning September 16, 2003, and continuing through May 26, 2005, in Lucas County, Ohio, with purpose to deprive the owner of property or services, did 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, and the value of the property or services stolen was One Million (\$1,000,000.00) Dollars or more, in violation of §2913.02(A)(2), (B)(1) and (B)(2) OF THE OHIO REVISED CODE, AGGRAVATED THEFT, BEING A FELONY 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.

" " / • (J61 - THIRTY-FIRST

COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, during the time period from September 16, 2003 through May 26, 2005, did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity, and/or did conduct or attempt to conduct a transaction with the purpose to promote, manage, establish, carry on, or facilitate the 19

promotion, management, establishment, or carrying on of corrupt activity, to wit, a payment to the line of credit of Vintage Coins and Collectibles in the total amount of \$393,000.00, in violation of §1315.55(A)(1) **AND/OR (A)(3) OF THE REVISED CODE, MONEY LAUNDERING, BEING A FELONY OF THE THIRD 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.

THIRTY-SECOND COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 4th day of February, 1999, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 4451, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or (A)(3) OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. THIRTY-THIRD COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 28th day of April, 1999, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 4880, that the offender knew to have been forged, in 20

violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. THIRTY-FOURTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 11th day of May, 1999, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 4940, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. THIRTY-FIFTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 7th day of April, 2000, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 6481, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. 21

THIRTY-SIXTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 7th day of May, 2000, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 6769, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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.

THIRTY-SEVENTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 28th day of July, 2000, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 7007, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. THIRTY-EIGHTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas 22

County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 29th day of August, 2000, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 7144, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or (A)(3) OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. THIRTY-NINTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 22nd day of September, 2000, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 7249, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or (A)(3) OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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, FORTIETH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 5th day of October, 2000, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any 23

writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 7316, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. FORTIETH-FIRST COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 17th day of October, 2000, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 7371, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. FORTY-SECOND COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 24th day of November, 2000, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 7548, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, 24**

**BEING A FELONY OF THE FIFTH 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. FORTIETH-THIRD COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 19th day of November, 2001, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 8977, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. FORTY-FOURTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 30th day of November, 2001, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 9034, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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.

FORTY-FIFTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 12th day of February, 2002, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 9316, that the offender knew to have been forged, in violation of §2913.31 (A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. FORTY-SIXTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 25th day of March, 2002, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 9490, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. FORTY-SEVENTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and 26

present that **THOMAS W. NOE**, on or about the 30th day of April, 2002, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 9626, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. FORTY-EIGHTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 11th day of June, 2002, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 9797, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. FORTY-NINTH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 3rd day of July, 2002, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any 27

writing to wit, check number 9878, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. FIFTIETH COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 7th day of March, 2003, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 10973, that the offender knew to have been forged, in violation of §2913.31(A)(1) and/or (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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, FIFTY-FIRST COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 13th day of August. 2003, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 11671, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH DEGREE**, contrary to the form of the statute in such 28

case made and provided, and against the peace and dignity of the State of Ohio. FIFTY-

SECOND COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 10th day of February, 2004, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 12533, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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. FIFTY-THIRD COUNT

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **THOMAS W. NOE**, on or about the 9th day of July, 2004, in Lucas County, Ohio, with purpose to defraud or knowing that the person was facilitating a fraud, did forge any writing of another without the other person's authority and/or utter, or possess with purpose to utter, any writing to wit, check number 13303, that the offender knew to have been forged, in violation of §2913.31(A)(1) **and/or** (A)(3) **OF THE OHIO REVISED CODE, FORGERY, BEING A FELONY OF THE FIFTH 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.

Julia R. Bates Lucas County  
Prosecutor