

COURT OF COMMON PLEAS  
BUTLER COUNTY, OHIO

FILED

STATE OF OHIO

CASE NO. CR2022-02-0162

Plaintiff 2022 JUL 13 AM 8:51

vs.

MARY L. SWAIN  
BUTLER COUNTY  
CLERK OF COURTS

SUPERSEDING INDICTMENT

ROGER REYNOLDS

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Defendant

STATE OF OHIO,  
COUNTY OF BUTLER, SS:

In the Year 2022

*THE JURORS OF THE GRAND JURY OF THE STATE OF OHIO, within and for the body of the County aforesaid, on their oaths, in the name and by the authority of the State of Ohio, do find and present that:*

COUNT ONE

**BRIBERY**

Did, in Butler County, or by some manner enumerated in R.C. 2901.12, whereby venue is placed in Butler County, in a continuing course of conduct between on or about at least November 08, 2019 and on or about at least September 17, 2021, Roger Reynolds did knowingly solicit a thing of value or valuable benefit to corrupt or improperly influence another public official with respect to the other public servant's duty, which constitutes the offense of BRIBERY, a Third Degree Felony, in violation of R.C. §2921.02(B), and against the peace and dignity of the State Of Ohio.

COUNT TWO

**UNLAWFUL INTEREST IN A PUBLIC CONTRACT**

Did, in Butler County, or by some manner enumerated in R.C. 2901.12, whereby venue is placed in Butler County, in a continuing course of conduct between on or about at least April 06, 2021 through on or about at least August 31, 2021, Roger Reynolds did knowingly, while being a public official, authorize or employ the authority or influence of the public official's office to secure authorization of a public contract in which the public official, a member of the public official's family, or any of the public official's business associates has an interest, which constitutes the offense of UNLAWFUL INTEREST IN A PUBLIC CONTRACT, a Fourth Degree Felony, in violation of R.C. §2921.42(A)(1), and against the peace and dignity of the State Of Ohio.

COUNT THREE

**UNLAWFUL USE OF THE AUTHORITY**

Did, in Butler County, or by some manner enumerated in RC. 2901.12, whereby venue is placed in Butler County, in a continuing course of conduct between on or about at least October 1, 2015 through on or about at least October 31, 2017, Roger Reynolds, while being a public official, did at least recklessly use or authorize the use of the authority or influence of office or employment to secure something of value, which constitutes the offense of UNLAWFUL USE OF THE AUTHORITY, a First Degree Misdemeanor, in violation of R.C. §102.03(D), and against the peace and dignity of the State Of Ohio.

COUNT FOUR  
**UNLAWFUL INTEREST IN A PUBLIC CONTRACT**

Did, in Butler County, or by some manner enumerated in R.C. 2901.12, whereby venue is placed in Butler County, between on or about at least August 1, 2015 through on or about at least September 30, 2021, in a continuing course of conduct, Roger Reynolds, while being a public official, did knowingly authorize or employ the authority or influence of the public official's office to secure authorization of a public contract in which the public official, a member of the public official's family, or any of the public official's business associates has an interest, which constitutes the offense of UNLAWFUL INTEREST IN A PUBLIC CONTRACT, a Fourth Degree Felony, in violation of R.C. §2921.42(A)(1), and against the peace and dignity of the State Of Ohio.

COUNT FIVE  
**CONFLICT OF INTEREST**

Did, in Butler County, or by some manner enumerated in R.C. 2901.12, whereby venue is placed in Butler County, between on or about at least August 1, 2021 through on or about at least October 31, 2021, in a continuing course of conduct, Roger Reynolds did at least recklessly promise and/or give a public official or employee a thing of value that is of such a character as to manifest a substantial and improper influence upon the public official or employee with respect to that person's duties, which constitutes the offense of CONFLICT OF INTEREST, a First Degree Misdemeanor, in violation of R.C. §102.03(F), and against the peace and dignity of the State Of Ohio.

COUNT SIX  
**UNLAWFUL INTEREST IN A PUBLIC CONTRACT**

Did, in Butler County, or by some manner enumerated in R.C. 2901.12, whereby venue is placed in Butler County, between on or about at least January 1, 2017 through on or about at least January 31, 2017, in a continuing course of conduct, Roger Reynolds, while being a public official, did knowingly authorize or employ the authority or influence of the public official's office to secure authorization of a public contract in which the public official, a member of the public official's family, or any of the public official's business associates has an interest, which constitutes the offense of UNLAWFUL INTEREST IN A PUBLIC CONTRACT, a Fourth Degree Felony, in violation of R.C. §2921.42(A)(1), and against the peace and dignity of the State Of Ohio.

Filed \_\_\_\_\_

Defendant arraigned, and pleads:  
\_\_\_\_\_ Guilty to this indictment

By \_\_\_\_\_  
**MARY L. SWAIN**  
**CLERK OF COURTS**

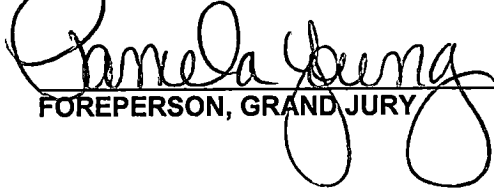
By \_\_\_\_\_  
Deputy

**DAVE YOST, OHIO ATTORNEY GENERAL**  
**SPECIAL PROSECUTOR**



BY \_\_\_\_\_  
**AAG BRADFORD L. TAMMARO (0030156)**  
**30 E. Broad Street, 23rd Floor**  
**Columbus, OH 43215**

A TRUE BILL



\_\_\_\_\_  
**FOREPERSON, GRAND JURY**