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- Count 1: Grand theft, F.S. 812.014(2)(a)1 (F1-L7)
- Count 2: Money laundering, F.S. 891.101(5)(c) (F1-L9)
- Count 3: Money laundering, F.S. 891.101(5)(a) (F3-L7)
- Count 4: Money laundering, F.S. 891.101(5)(b) (F2-L8)
- Count 5: Aggravated white collar crime, F.S. 775.0844(5)(c) (F1-L9)

JAM HILDERS  
 CLERK OF CIRCUIT COURT  
 ESCAMBIA COUNTY, FL  
 2016 MAY -4 P 12:00  
 COURT DIVISION  
 FILED & RECORDED

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Issue criminal summons:  
 School Warehouse, Inc.  
 1018 Delta Ave. Suite 302  
 Cincinnati, Ohio 45208

IN THE CIRCUIT COURT FOR ESCAMBIA COUNTY, FLORIDA

STATE OF FLORIDA,  
 Plaintiff,

v.

Case No.

SCHOOL WAREHOUSE, INC.,  
 Defendant.

co.def

INDICTMENT

COUNT 1: In the name and by the authority of the STATE of FLORIDA, the Grand Jurors of Escambia County, Florida, for the First Term, 2016, upon their oaths as Grand Jurors, do present and charge that from on or about August 16, 2011, and continuing through on or about March 24, 2015, in Escambia County, Florida, School Warehouse, Inc. did knowingly obtain or use, or endeavor to obtain or to use, money, funds or equipment valued at \$100,000 or more, the property of the State of Florida; Florida Department of Education; School District of Escambia County, Florida; and/or 21<sup>st</sup> Century Academy of Pensacola, Inc., by means of false pretenses, fraud, or deception and/or by making an unauthorized use, disposition or transfer of such property, with the intent to, either temporarily or permanently deprive State of Florida; Florida Department of Education; School District of Escambia County; Florida, and/or 21<sup>st</sup> Century Academy of Pensacola, Inc. of a right to the property or a benefit from the property, or appropriate the property to its own use or to the use of any person not entitled to the use of the property, in violation of section 812.014(1)(a) and (b) and (2)(a)1, Florida Statutes.

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COUNT 2: The Grand Jurors of Escambia County, Florida, for the First Term, 2016, upon their oaths as Grand Jurors, further presents and charges that from on or about September 7, 2011, and continuing through on or about September 6, 2012, in Escambia County, Florida, School Warehouse, Inc., knowing that money, funds or monetary instruments involved the proceeds of

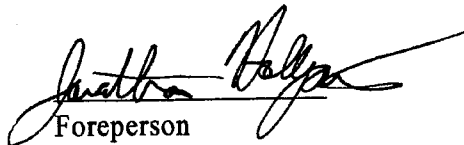
specified unlawful activity, that is, felony offenses in violation of Chapter 812, Florida Statutes, grand theft of property of the State of Florida; Florida Department of Education; School District of Escambia County, Florida; and/or 21<sup>st</sup> Century Academy of Pensacola, Inc., by means of false pretenses, fraud, or deception, did conduct or attempt to conduct financial transactions, as defined by section 896.101(2), Florida Statutes, that is, withdrawals, transfers or deposits between accounts involving a financial institution, Centennial Bank f/k/a Vision Bank, and/or PNC Bank, of money, funds or monetary instruments totaling or exceeding \$100,000 in a 12-month month period, which in fact involved the proceeds of such specified unlawful activity, with the intent to promote the carrying on of the specified unlawful activity, or knowing that the transaction is designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, in violation of section 896.101(3)(a) and (5)(c), Florida Statutes.

COUNT 3: The Grand Jurors of Escambia County, Florida, for the First Term, 2016, upon their oaths as Grand Jurors, further presents and charges that from on or about November 27, 2012, and continuing through on or about November 26, 2013, in Escambia County, Florida, School Warehouse, Inc., knowing that money, funds or monetary instruments involved the proceeds of specified unlawful activity, that is, felony offenses in violation of Chapter 812, Florida Statutes, grand theft of property of the State of Florida; Florida Department of Education; School District of Escambia County, Florida; and/or 21<sup>st</sup> Century Academy of Pensacola, Inc., by means of false pretenses, fraud, or deception, did conduct or attempt to conduct financial transactions, as defined by section 896.101(2), Florida Statutes, that is, withdrawals, transfers or deposits between accounts involving a financial institution, Centennial Bank f/k/a Vision Bank, and/or PNC Bank of money, funds or monetary instruments totaling or exceeding \$300 but less than \$20,000 in a 12-month month period, which in fact involved the proceeds of such specified unlawful activity, with the intent to promote the carrying on of the specified unlawful activity, or knowing that the transaction is designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, in violation of section 896.101(3)(a) and (5)(a), Florida Statutes.


COUNT 4: The Grand Jurors of Escambia County, Florida, for the First Term, 2016, upon their oaths as Grand Jurors, further presents and charges that from on or about March 16, 2015, and continuing through on or May 16, 2015, in Escambia County, Florida, School Warehouse, Inc., knowing that money, funds or monetary instruments involved the proceeds of specified unlawful activity, that is, felony offenses in violation of Chapter 812, Florida Statutes, grand theft of property of the State of Florida; Florida Department of Education; School District of Escambia County, Florida; and/or 21<sup>st</sup> Century Academy of Pensacola, Inc., by means of false pretenses, fraud, or deception, did conduct or attempt to conduct financial transactions, as defined by section 896.101(2), Florida Statutes, that is, withdrawals, transfers or deposits between accounts involving a financial institution, Centennial Bank f/k/a Vision Bank, Wells Fargo Bank and/or PNC Bank of money, funds or monetary instruments totaling or exceeding \$20,000 but less than

\$100,000 in a 12-month period, which in fact involved the proceeds of such specified unlawful activity, with the intent to promote the carrying on of the specified unlawful activity, or knowing that the transaction is designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, in violation of section 896.101(3)(a) and (5)(b), Florida Statutes.

COUNT 5: The Grand Jurors of Escambia County, Florida, for the First Term, 2016, upon their oaths as Grand Jurors, further presents and charges that from on or about August 16, 2011, and continuing through on or about May 16, 2015, in Escambia County, Florida, School Warehouse, Inc., did engage in at least two white collar crimes, that is, the commission of, or conspiracy to commit, felony offenses in violation of Chapter 812, Florida Statutes, grand theft of property of the State of Florida, Florida Department of Education, and/or School District of Escambia County, Florida, by means of false pretenses, fraud, or deception; and/or felony offenses in violation of Chapter 896, Florida Statutes, conducting financial transactions which involved the proceeds of such grand theft, that had the same or similar intents, results, accomplices, victims, or methods of commission, or that are otherwise interrelated by distinguishing characteristics and are not isolated incidents, and did thereby obtain or attempt to obtain \$50,000 or more from the State of Florida, Florida Department of Education; and/or School District of Escambia County, Florida, in violation of section 775.0844(5)(c), Florida Statutes.

  
Foreperson

The undersigned Assistant State Attorney has advised the Grand Jury returning this Indictment as authorized by and required by law.

  
Russell G. Edgar