


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

State of Ohio, Plaintiff vs. Nancy Caraballo Larissa M. Rodriguez, Defendants		A True Bill Indictment For Trafficking in or Illegal Use of Food Stamps - F3 §2913.46(B) 17 Additional Count(s)
Dates of Offense (on or about) 07/14/2015 to 12/10/2017	The Term Of January of 2018	Case Number 625508-18-CR


The State of Ohio, }
 Cuyahoga County } **SS.**

Count One	Trafficking in or Illegal Use of Food Stamps - F3 §2913.46(B)
Defendants	Nancy Caraballo, Larissa M. Rodriguez
Date of Offense	On or about July 14, 2015 to December 10, 2017
<p><i>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 the above named Defendant(s), on or about the date of the offense set forth above, in the County of Cuyahoga, unlawfully</i></p> <p>did knowingly possess, buy, sell, use, alter, accept, or transfer supplemental nutrition assistance program benefits, WIC program benefits, or any electronically transferred benefit, or any women, infants, and children program coupon in a manner not authorized by the "Food Stamp Act of 1977," 91 Stat. 958, 7 U.S.C.A. 2011, as amended, and/or the "Child Nutrition Act of 1966," 80 Stat. 885, 42 U.S.C.A. 1786, as amended and the aggregate face value of the supplemental nutrition assistance program benefits plus coupons provided under the "Child Nutrition Act of 1966," 80 Stat. 885, 42 U.S.C.A. 1786, as amended, plus the aggregate value of the electronically transferred benefits involved in the violation was seven thousand five hundred dollars or more and was less than one hundred fifty thousand dollars.</p> <p><i>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.</i></p>	

FILED
 JAN 31 2018
 Clerk of Courts
 Cuyahoga County, Ohio



 Foreperson of the Grand Jury



 Prosecuting Attorney

Count Two **Telecommunications Fraud - F3**
 §2913.05(A)
Defendants Nancy Caraballo, Larissa M. Rodriguez
Date of Offense On or about July 14, 2015 to December 10, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

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

FURTHERMORE, and the offender committed a violation of division (A) of Section 2913.05 of the Revised Code and the violation occurred as part of a course of conduct involving other violations of division (A) of Section 2913.05 of the Revised Code 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 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.

Count Three **Grand Theft - F4**
 §2913.02(A)(2)
Defendants Nancy Caraballo, Larissa M. Rodriguez
Date of Offense On or about July 14, 2015 to December 10, 2017

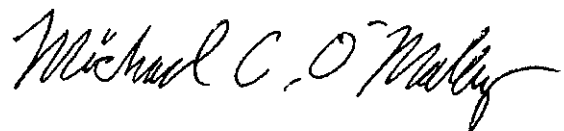
The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did with purpose to deprive the owner, the State of Ohio, of \$10,058.18 EBT Benefits or 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 and the property or services stolen is valued at \$7,500 or more and less than \$150,000.

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 Four **Money Laundering - F3**
 §1315.55(A)(1)

Defendants Nancy Caraballo, Larissa M. Rodriguez

Date of Offense On or about July 14, 2015 to December 10, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

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.

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 Five **Bribery - F3**
 §2921.02(A)

Defendants Larissa M. Rodriguez

Date of Offense On or about July 14, 2015 to December 10, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did promise, offer, or give any valuable thing or valuable benefit, to wit: EBT Benefits, with purpose to corrupt a public servant or party official, to wit: Bright Beginnings Parent Educator Nancy Caraballo, or improperly to influence her with respect to the discharge of her duty, whether before or after she was elected, appointed, qualified, employed, summoned, or sworn.

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 Six **Bribery - F3**
 §2921.02(B)

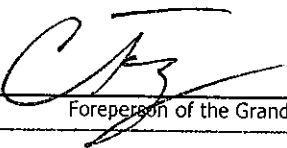
Defendants Nancy Caraballo

Date of Offense On or about July 14, 2015 to December 10, 2017

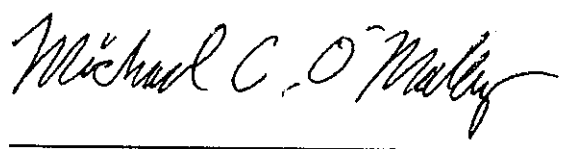
The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did knowingly solicit or accept for herself or another person any valuable thing or valuable benefit, to wit: EBT Benefits, to corrupt or improperly influence her or another public servant or party official with respect to the discharge of her or the other public servant's or party official's duty, either before or after Bright Beginnings Parent Educator Nancy Caraballo 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.



 Foreperson of the Grand Jury



 Prosecuting Attorney

Count Seven **Tampering with Records - F3**
 §2913.42(A)(1)

Defendants Nancy Caraballo

Date of Offense On or about November 30, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on Bright Beginnings, falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Home Visitation Report, 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 Eight **Tampering with Records - F3**
 §2913.42(A)(1)

Defendants Nancy Caraballo

Date of Offense On or about December 7, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on Bright Beginnings, falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Home Visitation Report, 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 Nine **Tampering with Records - F3**
 §2913.42(A)(1)

Defendants Nancy Caraballo


Date of Offense On or about January 5, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on Bright Beginnings, falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Home Visitation Report, 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 Ten **Tampering with Records - F3**
 §2913.42(A)(1)

Defendants Nancy Caraballo

Date of Offense On or about March 16, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on Bright Beginnings, falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Home Visitation Report, 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 Eleven **Tampering with Records - F3**
 §2913.42(A)(1)

Defendants Nancy Caraballo

Date of Offense On or about March 31, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on Bright Beginnings, falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Home Visitation Report, 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 Twelve **Tampering with Records - F3**
 §2913.42(A)(1)

Defendants Nancy Caraballo

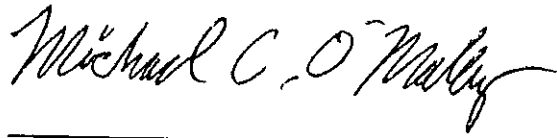
Date of Offense On or about April 19, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on Bright Beginnings, falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Home Visitation Report, 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 Thirteen Tampering with Records - F3

§2913.42(A)(1)

Defendants Nancy Caraballo

Date of Offense On or about June 26, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on Bright Beginnings, falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Home Visitation Report, 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 Fourteen Tampering with Records - F3

§2913.42(A)(1)

Defendants Nancy Caraballo

Date of Offense On or about July 10, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on Bright Beginnings, falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Home Visitation Report, 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 Fifteen Tampering with Records - F3

§2913.42(A)(1)

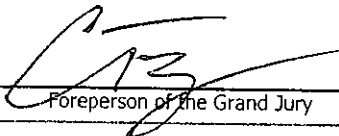
Defendants Nancy Caraballo

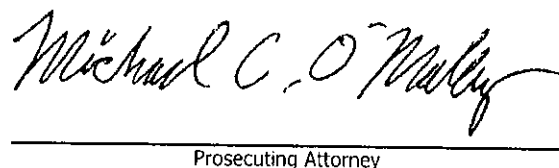
Date of Offense On or about August 4, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on Bright Beginnings, falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Home Visitation Report, 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 Sixteen Tampering with Records - F3
§2913.42(A)(1)

Defendants Nancy Caraballo

Date of Offense On or about September 6, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on Bright Beginnings, falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Home Visitation Report, 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 Seventeen Tampering with Records - F3
§2913.42(A)(1)

Defendants Nancy Caraballo

Date of Offense On or about November 6, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on Bright Beginnings, falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Home Visitation Report, 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 Eighteen Tampering with Records - F3
§2913.42(A)(1)

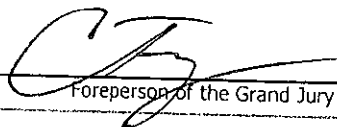
Defendants Nancy Caraballo

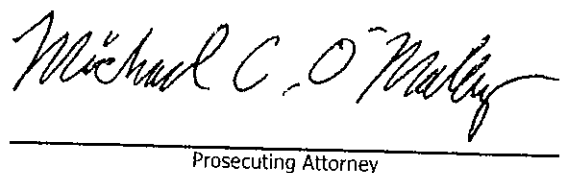
Date of Offense On or about November 20, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, knowing she had no privilege to do so, and with purpose to defraud or knowing she was facilitating a fraud on Bright Beginnings, falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Home Visitation Report, 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