

CLERK OF COURTS
HAMILTON COUNTY, OH
COMMON PLEAS

THE STATE OF OHIO, HAMILTON COUNTY

2026 JAN 20 A 9:26

COURT OF COMMON PLEAS

FILED

CRIMINAL DIVISION

STATE OF OHIO

Plaintiff

vs.

CAROLYN BROWN
a.k.a.
CAROLYN SMITH

Defendant

: NO. B2502384

: Judge McDowell

: BILL OF PARTICULARS



D147141726

Now comes the State of Ohio, by and through the undersigned Assistant Prosecuting Attorney, and hereby files the following Bill of Particulars. In addition to the allegations set forth in the indictment, incorporated herein, the State of Ohio further alleges the defendant, acting individually, or in complicity with others, in violation of R.C. 2923.03(A) engaged in the conduct described herein.

Count 1 – Telecommunications Fraud

On or about 1/1/2017 and continuing through 6/20/2023, the defendant, having devised a scheme to defraud the New Prospect Baptist Church and steal money that belonged to the church, knowingly disseminated, transmitted, or caused to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, telecommunications service, or voice over internet protocol service, any writing, data, sign, signal, picture, sound, or image, specifically all of the above associated with automated teller withdrawal transactions of cash from account(s) belonging to the New Prospect Baptist Church

made by the defendant in furtherance of her scheme to defraud the church of money; all of the above associated with electronic debit card purchases made by the defendant in furtherance of her scheme to defraud the church of money; all of the above associated with wire transfer or other electronic funds transfer or automated clearing house transactions made by the defendant in furtherance of her scheme to defraud the church of money; all as outlined on the bank statements provided in discovery or as highlighted on the summary spreadsheets filed herewith and incorporated herein, and the value of the benefit obtained by the defendant or of the detriment to the victim or victims of the fraud is \$150,000 or more but less than \$1 million dollars.

Count 2 – Theft Without Consent

On or about 1/1/2017 and continuing through 6/30/2023, the defendant stole money from the New Prospect Baptist Church, without the consent of the church, by taking money out of church accounts using ATM's; making cash withdrawals from the accounts; making unapproved wire transfers, electronic funds transfers, or automated clearinghouse transactions; and making unapproved purchases using debit cards linked to church accounts, all as outlined on the bank statements provided in discovery or as highlighted on the summary spreadsheets filed herewith and incorporated herein, and value of the property obtained is \$150,000 or more but less than \$750,000.

Count 3 – Theft Beyond the Scope of Consent

On or about 1/1/2017 and continuing through 6/30/2023, the defendant stole money from the New Prospect Baptist Church, beyond the consent of the church, by exceeding the scope of her authority to spend church money by taking money out of church accounts using ATM's; making cash withdrawals from the accounts; making unapproved wire transfers, electronic funds transfers, or automated clearinghouse transactions; and making unapproved purchases using

debit cards linked to church accounts, all as outlined on the bank statements provided in discovery or as highlighted on the summary spreadsheets filed herewith and incorporated herein, and value of the property obtained is \$150,000 or more but less than \$750,000.

Count 4 – Theft by Deception,

On or about 1/1/2017 and continuing through 6/30/2023, the defendant stole money from the New Prospect Baptist Church, by deception, by taking money out of church accounts using ATM's; making cash withdrawals from the accounts; making unapproved wire transfers, electronic funds transfers, or automated clearinghouse transactions; and making unapproved purchases using debit cards linked to church accounts, all as outlined on the bank statements provided in discovery or as highlighted on the summary spreadsheets filed herewith and incorporated herein, the defendant deceived the church by failing to disclose her actions, by providing false and misleading representations to the board of trustees and the pastors, and by submitting fraudulent balance sheets and spending information to the board of trustees and the pastors and value of the property obtained is \$150,000 or more but less than \$750,000.

Count 5 – Unauthorized Use of Property

On or about 1/1/2017 and continuing through 6/30/2023, the defendant knowingly used money belonging to the New Prospect Baptist Church, without the consent of the church for the purpose of devising a scheme to defraud or to obtain property or services to benefit herself by taking money out of church accounts using ATM's; making cash withdrawals from the accounts; making unapproved wire transfers, electronic funds transfers, or automated clearinghouse transactions; and making unapproved purchases using debit cards linked to church accounts, all as outlined on the bank statements provided in discovery or as highlighted on the summary

spreadsheets filed herewith and incorporated herein, and value of the property obtained or loss to the victim is \$150,000 or more but less than \$750,000.

Respectfully submitted,

/S/Andrew A. Berghausen
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Certificate of Service

The undersigned hereby certifies that a copy of this pleading was served on the defendant or counsel of record on or about the date filed.

/S/Andrew A. Berghausen
Andrew A. Berghausen, P0061818
Assistant Prosecuting Attorney