

OCT 7 2026

ANDREW D. PLESICH
CLERK

JEFFERSON COUNTY COMMON PLEAS COURT

STATE OF OHIO,

CASE NO. 26-CR-131A; 26-CR-
131B; 26-CR-131C

Plaintiff

VS.

INDICTMENT

MICHAEL JOHN PERIK

26-CR-131B

DOB: [REDACTED]

MICHAEL JOHN

26-CR-131A

GEOGHEGAN

DOB: [REDACTED]

NICOLE MARIE

26-CR-131C

ROWE

AKA: NICOLE

MARIE

COLCLASURE

DOB: [REDACTED]

Defendant.

On the term Fall Term Special
Session

Convened on: October 7, 2026

Count One

ENGAGING IN A PATTERN OF CORRUPT ACTIVITIES

The Jurors of the Grand Jury of the State of Ohio, within and for the body of Jefferson County, on their oaths, in the name and by the authority of the State of Ohio, do find and present:

MICHAEL JOHN PERIK, MICHAEL JOHN GEOGHEGAN AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE (collectively

“Defendants”), on or about the 1st day of January, 2017 through the 31st day of March, 2022, in the County of Jefferson, State of Ohio aforesaid, as a continuing course of conduct, while employed by, or associated with an enterprise, did conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity. Defendants engaged in multiple acts of Theft, in violation of Revised Code 2913.02, Tampering with Records, in violation of Revised Code 2913.42, Telecommunications Fraud in violation of Revised Code 2913.05, Money Laundering in violation of Revised Code 1315.55, Receiving Stolen Property in violation of Revised Code 2913.51, Bribery in violation of Revised Code 2921.02, and Having an Unlawful Interest in a Public Contract in violation of Revised Code 2921.42, including, but not limited to, the acts alleged in the conduct set out in Counts One through Twenty-Four of this Indictment, inclusive, as if fully rewritten herein when at least one incident of corrupt activities would constitute a felony of the first, second or third degree in violation of Revised Code 2923.32(A)(1), Engaging in a Pattern of Corrupt Activity, A FELONY OF THE FIRST DEGREE.

A. The Enterprise

This Enterprise is an association and/or organization and/or a group of persons and/or companies associated in fact, although not a legal entity, including but not limited to Michael John Perik, Nicole Marie Rowe AKA: Nicole Marie Colclasure, Michael John Geoghegan, Student Resource Center LLC, Student Services Center LLC, Higher Education Partners, US Skills, Eastern Gateway Community College, and others known and not known all of whom are persons associated with the Enterprise.

B. The Parties

- (1) Eastern Gateway Community College was a public institution founded originally in 1968 in Steubenville as Jefferson County Technical Institute. Eastern Gateway provided two-year education programs for the people of the upper Ohio Valley. Eastern Gateway served the needs of the rust belt including the families of steelworkers, high school graduates that needed education but could not afford to relocate, and workers that needed retraining as factories closed.
- (2) Higher Education Partners (HEP) was a for-profit entity owned by Michael John Perik and another individual. The senior management team of HEP included Michael John Perik, Nicole Marie Rowe AKA: Nicole Marie Colclasure, Luis Rosa and Person #5.

- (3) U.S. Skills, LLC was an educational software licensing and consulting company owned by Michael Perik.
- (4) Student Resource Center (SRC) was a for-profit entity founded by Michael Perik, Nicole Rowe, and two other individuals. Michael Perik was CEO of SRC. Nicole Rowe was President of SRC. Luis Rosa was Chief Student Experience Officer.
- (5) Student Service Center, LLC (SSC) was a for-profit limited liability company owned by Michael Perik.
- (6) Michael John Perik was partial owner and Chief Executive Officer of SRC, owner of SSC, owner of U.S. Skills, and partial owner and senior manager of HEP.
- (7) Nicole Marie Rowe AKA: Nicole Marie Colclasure was partial owner and President of SRC.
- (8) Michael John Geoghegan was the Chief Financial Officer for Eastern Gateway Community College and later became the Chief Financial Officer and President of the College. Michael John Geoghegan was a public official.
- (9) Luis Rosa was partial owner and Chief Student Experience Officer for SRC and also simultaneously the Interim Financial Aid Director for Eastern Gateway Community College. Luis Rosa was the Interim Financial Aid Director in 2018 and early 2019. Luis Rosa was a public official.
- (10) Person #1 was an employee of SSC, an employee of SRC and became the Interim Financial Aid Director for Eastern Gateway Community College on or about May 12, 2019. Person #1 was an employee of SSC or of SRC and received payments from those entities while also employed by Eastern Gateway Community College as Financial Aid Director. Person #1 was a public official.
- (11) Person #2 was Vice President of Online and Student Services at Eastern Gateway Community College. Person #2 received payments from Student Resource Center while employed in her public position at Eastern Gateway Community College. Person #2 was a public official.

- (12) Person #3 was the President of Eastern Gateway Community College in 2017, 2018 and 2019. Person #3 was a public official.
- (13) Person #4 was the Vice President of Administration in 2017, 2018 and 2019. Person #4 was a public official.
- (14) Person #5 was an owner of SRC and performed financial-related tasks for HEP, SRC and SSC.

C. Purpose of the Enterprise

The Enterprise functioned for the general purpose of obtaining as much money as possible from the disbursement of Federal financial aid and State subsidies and then diverting those disbursements both through fraudulent reimbursements and as incentive compensation in violation of Federal law.

The Enterprise accomplished its purpose by creating the façade that entities owned and controlled by Michael John Perik, Nicole Rowe and others were independent and unaffiliated third-party contractors when in fact those entities and owners did not operate as independent and unaffiliated third-parties. Rather, they exercised significant and improper influence over, were dependent on, or were affiliated with Eastern Gateway Community College, and the College's procedures and processes that controlled attendance verification, enrollment, fees, draw downs of and access to financial aid, and the integrity of educational programming, among other critical College functions.

The Enterprise also accomplished its purpose by engaging in a scheme to defraud, including by disbursing and retaining financial aid for ineligible students, falsifying data and records and concealing data and records that would reveal the same, engaging in a fraudulent reimbursement scheme and obtaining Payroll Protection Program loans and loan forgiveness for reimbursed expenses and for ineligible payments, falsifying records and falsely stating that union scholarships were funding tuition, and paying public officials for the purpose of improperly influencing them. The Enterprise generally functioned to operate Eastern Gateway Community College primarily for the financial benefit of the entities owned and operated by Michael J. Perik and Nicole Rowe at the expense of the College's mission, its students, the community and the taxpayer-funded financial aid and subsidies.

D. Activities of the Parties – Unlawful Incentive Compensation

Federal law prohibits the payment of incentive compensation to individuals and entities that engage in activities to support securing enrollment and financial aid. Consistent with Federal law, the US Department of Education considers payments to persons and entities that undertake or have responsibility for, recruitment and decisions related to securing financial aid as subject to the incentive compensation ban even if their work also includes other activities.

The US Department of Education has interpreted payments based on the amount of tuition generated by an institution as not violating the incentive compensation ban if the payment compensates an unaffiliated independent third party that provides a set of bundled services that may include recruitment services. The independence of the third party (both as a corporate matter and as a decision maker) from the institution that provides the actual teaching and educational services is a significant safeguard against abuse. However, the bundled services interpretation is not applicable to decisions related to securing financial aid.

Michael John Perik, Nicole Marie Rowe AKA: Nicole Marie Colclasure and Michael John Geoghegan knew of the Federal prohibition against incentive compensation and the US Department of Education's interpretation. Nevertheless, SRC and its affiliate entities operated in concert to perform services that (1) secured enrollment while disregarding the requirement for independence and (2) secured financial aid, all while receiving a "profit" share. They entered into contracts with Eastern Gateway that gave the appearance of independence and the appearance that entities receiving a profit share were not securing financial aid, and then knowingly violated Federal Law by receiving prohibited incentive compensation for those same activities. They hid behind contracts to fool regulators and then disregarded those contracts and engaged in activities to control enrollment and financial aid for the purpose of maximizing their incentive compensation in violation of Federal law.

On May 1, 2012, Eastern Gateway entered into a 20-year collaboration agreement with HEP for the purpose of assisting with expansion of its academic and degree program offerings at its Valley Center campus in Youngstown, Ohio. A 2016 amendment to the collaboration agreement with HEP provided for the growth of online education. Under the contract, after reimbursing HEP and IIEP's subcontractor for operating expenses, Eastern Gateway distributed remaining surplus revenue 50% to HEP's subcontractor and 25% to HEP. Revenue included tuition, fees, state subsidy, Pell Grants, and any other subsidies available to students, especially union students.

On June 30, 2017, Eastern Gateway entered into a collaboration agreement with SRC to provide a "Free College Benefit Program." In effect, the Free College Benefit Program was designed to fund the education of all the students under the program with primarily the Pell Grants disbursed for the education of the needy students. Similar to the agreement with HEP, Eastern Gateway agreed to reimburse SRC for its operating expenses and then to distribute the remaining surplus revenue 50% to SRC.

The SRC Collaboration Agreement was carefully drafted to meet the US Department of Education's bundled services exception for independent third parties. The Collaboration Agreement provided for tuition sharing in the form of 50% of surplus revenue on top of reimbursing SRC for its operating expenses that included student recruitment services. However, the Collaboration Agreement clearly stated that SRC would operate as an "independent contractor" stating that SRC "shall be deemed to be an independent contractor to EGCC" and "Nothing contained in this Agreement shall create or be deemed to create an employment relationship, partnership, association or joint venture relationship between [the entity], on the one hand, and EGCC, on the other. The terms of this Agreement are not intended to cause any of the parties or their Affiliates to become a joint employer for any purpose." On its face, the Collaboration Agreement would seemingly comply with Federal law, but reality was very different. SRC did not operate independently from EGCC. Its owners and operators essentially took over Eastern Gateway, embedding Michael John Perik and Nicole Marie Rowe AKA: Nicole Marie Colclasure's lieutenants in essential College functions not connected with SRC contracted services so they could maximize their profits.

The SRC Collaboration Agreement also clearly stated that Eastern Gateway would have exclusive control of the administration and management of financial aid. Moreover, none of the SRC services listed in the Collaboration Agreement concerned financial aid activities. Regulators and attorneys who reviewed the Collaboration Agreement to ensure compliance with the Federal ban on incentive compensation would see no connection between SRC's contracted services and financial aid decisions. However, SRC exercised control over financial aid decisions at the College for years.

Essentially, the SRC Collaboration Agreement was a carefully constructed illusion designed to mislead regulators and attorneys while in reality, Michael John Perik and Nicole Marie Rowe AKA: Nicole Marie Colclasure, through the entities they owned and operated, knowingly violated the Federal Incentive Compensation Ban obtaining Millions of Dollars in illegal profit payments.

E. Activities of the Parties – Improper Influence over Public Officials and Control of Financial Aid

Michael John Perik and Nicole Marie Rowe AKA: Nicole Marie Colclasure and the entities they owned and operated exercised improper influence including by issuing payments to public officials working in key positions at Eastern Gateway Community College including public officials who oversaw enrollment and financial aid. Payments to public officials were billed back to the College and falsely claimed as legitimate expenses under the contracts. They were not legitimate expenses.

On or around December 13, 2018 Michael John Perik formed SSC as an LLC in the State of Ohio. The next day on December 14, 2018, SSC contracted with Eastern Gateway to provide services concerning “enrollment management process and financial aid support.” Unlike the HEP and SRC Collaboration Agreements, the SSC agreement was a fee-for-service agreement and did not include incentive compensation. The SSC agreement would allow Michael John Perik and Nicole Marie Rowe AKA: Nicole Marie Colclasure to provide financial aid services while seemingly not receiving incentive compensation in violation of Federal Law. However, SSC was operated as an arm of SRC which was receiving incentive compensation. Employees were inexplicably moved back and forth between SSC and SRC payroll and SSC and SRC were not operated as separate entities. SSC was nothing more than a shell of Michael John Perik, Nicole Marie Rowe AKA: Nicole Marie Colclasure and SRC. Nevertheless, Eastern Gateway immediately contracted with the one-day old company.

Around the same time as the formation of SSC, Michael John Perik, Nicole Marie Rowe AKA: Nicole Marie Colclasure and Michael Geoghegan installed Luis Rosa, an SRC employee as the Interim Director of Financial Aid at Eastern Gateway. Between December 2018 and March 2019, Luis Rosa received approximately \$80,000.00 from SRC while he served as the Interim Director of Financial Aid for the College. Luis Rosa was given the title of Interim Financial Aid Director, a College email address and access to the College’s internal systems and the Federal financial aid systems. Despite this access, Luis Rosa was never employed by the College.

Luis Rosa accessed Federal systems and ordered the disbursement of Federal financial aid on behalf of the College, including for students who were not eligible to receive such aid. Luis Rosa’s actions caused Eastern Gateway Community College to disburse over \$1,500,000.00 in Federal financial aid that Eastern Gateway was not entitled to receive. Much of this money was used to pay invoices submitted by entities owned and operated by Michael John Perik and Nicole Marie Rowe AKA: Nicole Marie Colclasure, including for a “profit” share of the revenue.

In early 2019 after realizing that financial aid disbursements would not match individual student accounts, Eastern Gateway hired a consultant to serve as Interim Director of Financial Aid. The consultant had significant experience and knowledge regarding Federal financial aid requirements. The consultant determined that Luis Rosa had improperly disbursed financial aid for students who were not eligible. The consultant also found that Eastern Gateway was not confirming that students were actually in attendance and eligible to receive Pell Grants and Eastern Gateway was not identifying nor properly reporting that students had withdrawn from classes. Nevertheless, Eastern Gateway improperly took Federal financial aid for those ineligible students.

After the consultant identified that approximately \$3,600,000.00 was due back to the US Department of Education based on Eastern Gateway's own records, he began correcting the data that Luis Rosa had submitted to support financial aid disbursements. The consultant's corrections to the Federal financial aid system caused electronic notices to Michael John Geoghegan requiring the College to repay the funds. Michael John Geoghegan instructed the consultant to stop correcting the data in the Federal system and told the consultant that the College had already spent the money and could not pay its bills if the money was returned. When the consultant warned Michael John Geoghegan that financial aid was wrongfully retained by the College and must be returned, the consultant was quickly terminated. Michael John Geoghegan continued to order "profit" sharing payments to be paid to Michael J. Perik and Nicole Rowe's companies knowing that the payments were derived from financial aid wrongfully retained by the College.

Michael John Perik and Nicole Marie Rowe AKA: Nicole Marie Colclasure knew that the College was wrongfully retaining millions of dollars owed back to the Department of Education due to the actions of their employee and partner, Luis Rosa. Moreover, they knew that Michael John Geoghegan had ordered that the false data in the Federal system not be corrected. Nevertheless, SRC invoiced for and received "profit" payments at their direction.

Soon after terminating the consultant, on or around May 12, 2019, Person #1, an employee of SSC, was installed by the Defendants as the new Interim Director of Financial Aid at Eastern Gateway. Unlike Luis Rosa, Person #1 became an employee of Eastern Gateway. Michael John Geoghegan informed Person #1 at the time of his hiring, however, that Michael John Perik would continue to pay Person #1 approximately \$25,000.00 per year under one of Michael John Perik or Nicole Marie Rowe AKA: Nicole Marie Colclasure's companies. Person #1 was then paid approximately this sum each year, for approximately three years, by one or more of

Michael John Perik's and Nicole Marie Rowe AKA: Nicole Marie Colclasure's companies.

In July 2019, Michael John Perik executed a new contract between Eastern Gateway and SSC. SSC then invoiced Eastern Gateway for SSC's payments to Person #1 falsely claiming that the invoiced services were for SSC's contracted services even though Person #1 was not performing any of SSC's contracted services. SSC falsely identified Person #1 as "Vice President" of SSC to make it appear that Person #1 was performing legitimate services supporting its contract with Eastern Gateway when in fact, Person #1 was receiving \$25,000.00 for the purpose of circumventing the compensation guidelines of Eastern Gateway and unlawfully influencing Person #1 in the performance of his duties as Interim Financial Aid Director.

Immediately after taking the position of Interim Financial Aid Director, Person #1, at the direction of Michael John Perik, Nicole Marie Rowe AKA: Nicole Marie Colclasure and Michael John Geoghegan, ordered Eastern Gateway's financial aid staff to move up the date for financial aid disbursement to occur before Eastern Gateway's add/drop date for students. This was done for the purpose of obtaining financial aid for students that the parties knew would later be determined as never attending classes, so that Eastern Gateway would receive essentially an interest-free loan and to ensure that Michael John Perik and Nicole Marie Rowe AKA: Nicole Marie Colclasure's entities would continue to receive payments including "profit" payments from Pell Grants for ineligible students.

In or around March 2020, Michael John Perik and Nicole Marie Rowe AKA: Nicole Marie Colclasure transferred Person #1's employment with SSC to SRC. Thereafter, SRC invoiced Eastern Gateway, falsely including Person #1's compensation as "Payroll" for the "Call Center" when Person #1 was not performing any of SRC's contracted services. SRC submitted invoices and received reimbursement from Eastern Gateway for its payments to Person #1 until on or about May 30, 2022. In causing Eastern Gateway to pay for payments to Person #1 from SSC and SRC, Michael John Perik, Nicole Marie Rowe AKA: Nicole Marie Colclasure and Michael John Geoghegan caused Eastern Gateway's public documents identifying Person #1's compensation to be falsified. Additionally, similar to SRC's control of financial aid through Luis Rosa, SRC continued to control financial aid at Eastern Gateway by employing Person #1.

F. Activities of the Parties – False "Scholarships"

Throughout the period of the Indictment, Michael John Perik, Nicole Marie Rowe AKA: Nicole Marie Colclasure and later Michael John Geoghegan took steps to make it appear that Unions were funding scholarships as a "Free College Benefit" to their members. These actions included payments and charge backs as well as false assertions that Unions were providing a scholarship benefit when Unions were not providing funding. In fact, the "Free College Benefit Program" was largely funded by Pell Grants for needy students with massive write-offs by the College at the expense of the taxpayers. These actions were for the purpose of making it appear that the collaboration was more profitable than it was and was part of the larger scheme to defraud.

Students were also victims of this fraud. Students were led to believe that they were receiving a Union-funded scholarship, when in fact their Federal financial aid dollars were taken and used to pay the education of less-needy students, and for unlawful incentive compensation payments.

G. Activities of the Parties – Improper Influence over Public Officials (Person #2)

On or around July 28, 2020, Nicole Marie Rowe AKA: Nicole Marie Colclasure offered to pay \$10,000.00 to Person #2, a public official at Eastern Gateway serving as Vice President of Online & Student Services. The \$10,000.00 was to be divided in equal installments over approximately a one-year period. Person #2 was in a key position at Eastern Gateway and her decisions in part drove profit for Michael John Perik and Nicole Marie Rowe AKA: Nicole Marie Colclasure's entities. Nicole Marie Rowe AKA: Nicole Marie Colclasure's purpose was to unlawfully influence Person #2 in the performance of her public duties.

On July 28, 2020, Person #2 provided her personal account number and routing number to Nicole Marie Rowe AKA: Nicole Marie Colclasure over email. Nicole Marie Rowe AKA: Nicole Marie Colclasure forwarded the email to Michael John Perik on August 5, 2020. Michael John Perik responded stating "Deal is for an extra 10K correct?" Nicole Rowe responded "Yep!" Michael John Perik then caused a wire transaction for the first installment payment to Person #2 on or about August 5, 2020. Thereafter, SRC made multiple installment payments to Person #2 through about April 2022. The payments were falsely invoiced back to Eastern Gateway as legitimate expenses for contracted services of SRC. In causing Eastern Gateway to pay for their payments to Person #2, Nicole Marie Rowe AKA: Nicole Marie Colclasure and Michael John Perik caused Eastern Gateway's public documents identifying Person #2's compensation to be falsified.

Michael John Geoghegan knew that profit payments to the entities owned and operated by Michael John Perik and Nicole Marie Rowe AKA: Nicole Marie Colclasure violated the Federal ban on incentive compensation. Michael John Geoghegan ordered and approved Millions of Dollars in taxpayer dollars knowing he was violating the ban. Michael John Geoghegan also approved of, and supported, their payments to, and control over, the public officials overseeing financial aid. Michael John Geoghegan knowingly participated in the activities of the Enterprise.

H. Activities of the Parties – Paycheck Protection Program Fraud

Although SRC and SSC received reimbursement from Eastern Gateway for their payments to employees, Michael John Perik also applied for, and received, Paycheck Protection Program loans for the same payments. Michael John Perik subsequently applied for, and received, loan forgiveness for these loans. SRC's loan was forgiven on or around November 23, 2020 and SSC's loan was forgiven on or around December 16, 2021. In effect, SRC and SSC received double payment for the same payments to the same people including for payments to public employees and others that were not legitimate payroll expenses of SSC or SRC.

In total, Michael John Perik, Nicole Marie Rowe AKA: Nicole Marie Colclasure, and Michael John Geoghegan stole more than approximately Twenty Million Dollars from Eastern Gateway Community College, the U.S. Federal Government, the students of Eastern Gateway, and the State of Ohio between on or about January 1, 2017, to on or about March 31, 2022.

ENGAGING IN A PATTERN OF CORRUPT ACTIVITIES, A FELONY OF THE FIRST DEGREE.

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 Two
AGGRAVATED THEFT OF ONE MILLION FIVE HUNDRED THOUSAND
DOLLARS OR MORE

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 1st day of January, 2017 through the 31st day

of March, 2022, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, with purpose to deprive the owners, Eastern Gateway Community College, the State of Ohio, the United States Government and the students of Eastern Gateway Community College, of property, to wit: money, did knowingly obtain or exert control over either the property or services by deception when the value of the property or services stolen is one million five hundred thousand dollars (\$1,500,000.00) or more in violation of Sections 2913.02(A)(3) & (B) of the Ohio Revised Code, Aggravated Theft of One Million Five Hundred Thousand Dollars or More, A FELONY OF THE FIRST DEGREE.

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
AGGRAVATED THEFT OF ONE MILLION FIVE HUNDRED THOUSAND
DOLLARS OR MORE

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 1st day of January, 2017 through the 31st day of March, 2022, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, with purpose to deprive the owners, Eastern Gateway Community College, the State of Ohio, the United States Government and the students of Eastern Gateway Community College, of property, to wit: money, 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 when the value of the property or services stolen is one million five hundred thousand dollars (\$1,500,000.00) or more in violation of Sections 2913.02(A)(2) & (B) of the Ohio Revised Code, Aggravated Theft of One Million Five Hundred Thousand Dollars or More, A FELONY OF THE FIRST DEGREE.

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 Four
AGGRAVATED THEFT OF ONE MILLION FIVE HUNDRED THOUSAND
DOLLARS OR MORE

The Grand Jurors do further find and present:

MICHAEL JOHN GEOGHEGAN, on or about the 9th day of October, 2017 through the 31st day of March, 2022, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, with purpose to deprive the owners, Eastern Gateway Community College, the State of Ohio, the United States Government and the students of Eastern Gateway Community College, of property, to wit: money, did knowingly obtain or exert control over either the property or services by deception when the value of the property or services stolen is one million five hundred thousand dollars (\$1,500,000.00) or more in violation of Sections 2913.02(A)(3) & (B) of the Ohio Revised Code, Aggravated Theft of One Million Five Hundred Thousand Dollars or More, A FELONY OF THE FIRST DEGREE.

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
AGGRAVATED THEFT OF ONE MILLION FIVE HUNDRED THOUSAND
DOLLARS OR MORE

The Grand Jurors do further find and present:

MICHAEL JOHN GEOGHEGAN, on or about the 9th day of October, 2017 through the 31st day of March, 2022, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, with purpose to deprive the owners, Eastern Gateway Community College, the State of Ohio, the United States Government and the students of Eastern Gateway Community College, of property, to wit: money, 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 when the value of the property or services stolen is one million five hundred thousand dollars (\$1,500,000.00) or more in violation of Sections 2913.02(A)(2) & (B) of the Ohio Revised Code, Aggravated Theft of One Million Five Hundred Thousand Dollars or More, A FELONY OF THE FIRST DEGREE.

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
THEFT IN OFFICE

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK, MICHAEL JOHN GEOGHEGAN AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 9th day of October, 2017 through the 6th day of April, 2021, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, was a public official and did knowingly commit a theft offense, to wit: Theft in violation of Revised Code 2913.02, and/or Tampering with Records in violation of R.C. 2913.42, and/or Forgery, in violation of Revised Code Revised Code 2913.31, and/or Telecommunications Fraud in violation of Revised Code 2913.05, having used his or her office in aid of committing the offense or permitted or assented to its use in aid of committing the offense, when the value of the property or services stolen is seven thousand five hundred dollars (\$7,500.00) or more, in violation of Sections 2921.41(A)(1) & (B) of the Revised Code. Theft in Office, a FELONY OF THE THIRD DEGREE.

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 Seven
THEFT IN OFFICE

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK, MICHAEL JOHN GEOGHEGAN AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 7th day of April, 2021 through the 31st day of March, 2022, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, was a public official and did knowingly commit a theft offense, to wit: Theft in violation of Revised Code 2913.02, and/or Tampering with Records in violation of R.C. 2913.42, and/or Forgery, in violation of Revised Code Revised Code 2913.31, and/or Telecommunications Fraud in violation of Revised Code 2913.05, having used his or her office in aid of committing

the offense or permitted or assented to its use in aid of committing the offense, when the value of the property or services stolen is seven hundred fifty thousand dollars (\$750,000.00) or more, in violation of Sections 2921.41(A)(1) & (B) of the Revised Code. Theft in Office, a FELONY OF THE FIRST DEGREE.

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
TELECOMMUNICATIONS FRAUD

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 1st day of January, 2017 through the 1st day of March, 2022, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, having devised a scheme to defraud, knowingly disseminated, transmitted, or caused to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service a writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud, and the violation occurred as part of a course of conduct involving other violations of Revised Code Section 2913.05(A) or violations of, attempts to violate, conspiracies to violate, or complicity in violations of section 2913.02, 2913.31, 2913.42 of the Revised Code, and when the value of the benefit obtained by the offender or of the detriment to the victim of the fraud is one million dollars (\$1,000,000.00) or more, in violation of Sections 2913.05(A), (B) & (C) of the Revised Code. Telecommunications Fraud, a FELONY OF THE FIRST DEGREE.

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
TELECOMMUNICATIONS FRAUD

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 1st day of April, 2020 through the 31st day of December, 2021, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, having devised a scheme to defraud, knowingly disseminated,

transmitted, or caused to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service a writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud, and the violation occurred as part of a course of conduct involving other violations of Revised Code Section 2913.05(A) or violations of, attempts to violate, conspiracies to violate, or complicity in violations of section 2913.02, 2913.31, 2913.42 of the Revised Code, and when the value of the benefit obtained by the offender or of the detriment to the victim of the fraud is one hundred fifty thousand dollars (\$150,000.00) or more and less than one million dollars (\$1,000,000.00), in violation of Sections 2913.05(A), (B) & (C) of the Revised Code. Telecommunications Fraud, a FELONY OF THE SECOND DEGREE.

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 Ten
TELECOMMUNICATIONS FRAUD

The Grand Jurors do further find and present:

MICHAEL JOHN GEOGHEGAN, on or about the 9th day of October, 2017 through the 1st day of March, 2022, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, having devised a scheme to defraud, knowingly disseminated, transmitted, or caused to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service a writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud, and the violation occurred as part of a course of conduct involving other violations of Revised Code Section 2913.05(A) or violations of, attempts to violate, conspiracies to violate, or complicity in violations of section 2913.02, 2913.31, 2913.42 of the Revised Code, when the value of the benefit obtained by the offender or of the detriment to the victim of the fraud is one million dollars (\$1,000,000.00) or more, in violation of Sections 2913.05(A), (B) & (C) of the Revised Code. Telecommunications Fraud, a FELONY OF THE FIRST DEGREE.

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
BRIBERY

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK, MICHAEL JOHN GEOGHEGAN AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 12th day of May, 2019 through the 30th day of May, 2022, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, with purpose to corrupt a public servant, or with purpose to improperly influence a public servant, to wit: "Person #1," the Financial Aid Director for Eastern Gateway Community College, with respect to the discharge of the public servant's duty, whether before or after the public servant was elected, appointed, qualified, employed, summoned, or sworn, did promise, offer, or give a valuable thing or valuable benefit in violation of Section 2921.02(A) & (H) of the Revised Code. Bribery, a FELONY OF THE THIRD DEGREE.

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
BRIBERY

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 18th day of July, 2020 through the 30th day of April, 2021, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, with purpose to corrupt a public servant, or with purpose to improperly influence a public servant, to wit: "Person #2," the Vice President of Online and Student Services for Eastern Gateway Community College, with respect to the discharge of the public servant's duty, whether before or after the public servant was elected, appointed, qualified, employed, summoned, or sworn, did promise, offer, or give a valuable thing or valuable benefit, to wit: money, in violation of Section 2921.02(A) & (H) of the Revised Code. Bribery, a FELONY OF THE THIRD DEGREE.

Count Thirteen
HAVING AN UNLAWFUL INTEREST IN A PUBLIC CONTRACT

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK, MICHAEL JOHN GEOGHEGAN AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 12th day of May 2019 through the 30th day of May 2022, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, did knowingly authorize, or employ the authority or influence of the public official's office to secure authorization of a public contract, to wit: contracts between Student Resource Center and Eastern Gateway Community College and Student Service Center and Eastern Gateway Community College, 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 in violation of Sections 2921.42(A)(1) & (E) of the Revised Code. Having an Unlawful Interest in a Public Contract, a FELONY OF THE FOURTH DEGREE.

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
HAVING AN UNLAWFUL INTEREST IN A PUBLIC CONTRACT

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 18th day of July 2020 through the 30th day of April 2021, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, did knowingly authorize, or employ the authority or influence of the public official's office to secure authorization of a public contract, to wit: contract between Student Resource Center and Eastern Gateway Community College, 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 in violation of Sections 2921.42(A)(1) & (E) of the Revised Code. Having an Unlawful Interest in a Public Contract, a FELONY OF THE FOURTH DEGREE.

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

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK, MICHAEL JOHN GEOGHEGAN AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 1st day of June, 2021, in the county of Jefferson, state of Ohio aforesaid, knowing they had no privilege to do so, and with purpose to defraud or knowing that they were facilitating a fraud, did falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data or record, to wit: Appointment Letter dated June 1, 2021 for "Person #1," the Financial Aid Director of Eastern Gateway Community College, when the writing, data, computer software, or record is kept by or belongs to a local, state, or federal governmental entity in violation of Revised Code Section 2913.42(A)(1) & (B)(4). Tampering with Records, a FELONY OF THE THIRD DEGREE.

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 Sixteen
TAMPERING WITH RECORDS

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK, MICHAEL JOHN GEOGHEGAN AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 20th day of October, 2021, in the county of Jefferson, state of Ohio aforesaid, knowing they had no privilege to do so, and with purpose to defraud or knowing that they were facilitating a fraud, did falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data or record, to wit: Appointment Letter dated October 20, 2021 for "Person #1," the Financial Aid Director for Eastern Gateway Community College, when the writing, data, computer software, or record is kept by or belongs to a local, state, or federal governmental entity in violation of Revised Code Section 2913.42(A)(1) & (B)(4). Tampering with Records, a FELONY OF THE THIRD DEGREE.

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
RECEIVING STOLEN PROPERTY

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK, MICHAEL JOHN GEOGHEGAN AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 26th day of October, 2020, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, did receive, retain, or dispose of property of another, to wit: money, knowing or having reasonable cause to believe that the property had been obtained through commission of a theft offense and the value of the property involved is one hundred fifty thousand dollars (\$150,000.00) or more in violation of Revised Code Section 2913.51(A) & (C). Receiving Stolen Property, a FELONY OF THE THIRD DEGREE.

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
RECEIVING STOLEN PROPERTY

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK, MICHAEL JOHN GEOGHEGAN AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 26th day of March, 2021 to on or about the 31st day of March 2021, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, did receive, retain, or dispose of property, to wit: money, of another knowing or having reasonable cause to believe that the property had been obtained through commission of a theft offense and the value of the property involved is one hundred fifty thousand dollars (\$150,000.00) or more in violation of Revised Code Section 2913.51(A) & (C). Receiving Stolen Property, a FELONY OF THE THIRD DEGREE.

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 Nineteen
RECEIVING STOLEN PROPERTY

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK, MICHAEL JOHN GEOGHEGAN AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 30th day of April, 2021, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, did receive, retain, or dispose of property, to wit: money, of another knowing or having reasonable cause to believe that the property had been obtained through commission of a theft offense and the value of the property involved is one hundred fifty thousand dollars (\$150,000.00) or more in violation of Revised Code Section 2913.51(A) & (C). Receiving Stolen Property, a FELONY OF THE THIRD DEGREE.

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 Twenty
MONEY LAUNDERING

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 26th day of October, 2020, in the county of Jefferson, State of Ohio aforesaid, as a continuing course of conduct, 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, in violation of Revised Code Section 1315.55(A)(3) & 1315.99. Money Laundering, a FELONY OF THE THIRD DEGREE.

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 Twenty-One
MONEY LAUNDERING

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 26th day of March, 2021 to on or about the 31st day of March 2021, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, 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, in violation of Revised Code Section 1315.55(A)(3) & 1315.99. Money Laundering, a FELONY OF THE THIRD DEGREE.

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 Twenty-Two
MONEY LAUNDERING

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 30th day of April, 2021, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, 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, in violation of Revised Code Section 1315.55(A)(3) & 1315.99. Money Laundering, a FELONY OF THE THIRD DEGREE.

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 Twenty-Three
MONEY LAUNDERING

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 3rd day of February, 2021, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, did conduct or attempt to conduct a transaction, to wit: wire transfer of \$833.33, with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit: Unlawful Interest in a Public Contract, in violation of Revised Code Section 1315.55(A)(3) & 1315.99. Money Laundering, a FELONY OF THE THIRD DEGREE.

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.

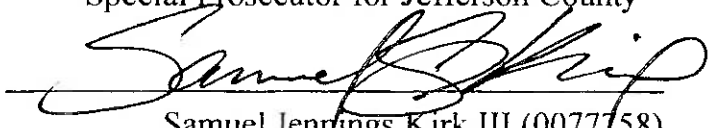
Count Twenty Four
MONEY LAUNDERING

The Grand Jurors do further find and present:

MICHAEL JOHN PERIK, MICHAEL JOHN GEOGHEGAN AND NICOLE MARIE ROWE AKA: NICOLE MARIE COLCLASURE, on or about the 12th day of March, 2021, in the county of Jefferson, state of Ohio aforesaid, as a continuing course of conduct, did conduct or attempt to conduct a transaction, to wit: Student Resource Center payment to "Person #1," the Financial Aid Director for Eastern Gateway Community College, with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, to wit: Unlawful Interest in a Public Contract, in violation of Revised Code Section 1315.55(A)(3) & 1315.99. Money Laundering, a FELONY OF THE THIRD DEGREE.

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.

Special Prosecutor for Jefferson County


Samuel Jennings Kirk III (0077758)