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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JUDGE ADAMS

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
v. )  
)  
CLARKE T. BLIZZARD, )  
)  
Defendant. )

INFORMATION

CASE NO. 1:07CR 059

Title 18, United States Code,  
Section 371

MAG. JUDGE GALLAS

The United States Attorney charges:

General Allegations

1. Beginning in or about 1912, the Ohio Bureau of Workers' Compensation ("OBWC") began assisting Ohio-based employers and employees to cover expenses related to workplace injuries by providing medical and compensation benefits for work-related injuries, diseases and deaths. Although its main office is located in Columbus, Ohio, the OBWC has approximately 16 customer service offices located across the state of Ohio, including in the Northern District of Ohio. At all times relevant to the offense charged in the Information, the

# Exhibit 31

OBWC had assets which averaged 19 billion dollars and was one of the largest exclusive state-fund workers' compensation bureaus in the United States. The assets of the OBWC were under the management and control of the Chief Financial Officer and the employees of the Investment Department. The overall operation of the OBWC involved and affected interstate commerce as did the management and execution of matters regarding its financial investments.

2. At all times relevant to the offense charged in this Information, Terrence W. Gasper was a public official who held the position of Chief Financial Officer ("CFO") of the OBWC. In his official capacity, Gasper was in a position to exert both formal and informal influence over decisions regarding all financial matters related to the OBWC, including but not limited to, those regarding the selection, retention and funding of investments and investment or money managers and advisors as well as the brokerage firms that administered OBWC's investment portfolio.

3. As CFO of the OBWC, Gasper oversaw a staff of 210 employees in accounting, actuarial, investment, facilities management and risk insurance departments within the Finance Division of the OBWC.

4. At all times relevant to the offense charged in this Information, the Defendant, CLARKE T. BLIZZARD was a marketer or salesperson who was associated with, employed by or a representative of businesses which managed or benefitted from the management of OBWC investment dollars. The OBWC paid these businesses over \$2.5 million in fees and commissions.

5. In or about January 1998, Gasper, CLARKE T. BLIZZARD, and others known to the United States Attorney agreed that CLARKE T. BLIZZARD would either directly or indirectly provide things of value to Gasper in exchange for favorable consideration from Gasper with respect to businesses,

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with which CLARKE T. BLIZZARD was associated, employed by or represented, that managed or benefitted from the management of OBWC investment business and that obtained and maintained OBWC investment business, which affected interstate and foreign commerce.

The United States Attorney further charges:

COUNT 1

(Conspiracy to Violate 18 U.S.C. §1951, the Hobbs Act: 18 U.S.C. § 371)

1. The General Allegations contained in paragraphs 1- 5 of this Information are realleged and incorporated by reference in this Count.

2. From in or about November 1998 through in or about October 2004, the exact dates being unknown to the United States Attorney, CLARKE T. BLIZZARD, defendant herein, Terrence W. Gasper ("Gasper"), and others known to the United States Attorney conspired, combined, confederated and agreed to commit an offense against the United States, that is, to obstruct, delay, and affect commerce and the movement of an article and commodity in commerce through extortion in violation of Title 18, United States Code, Section 1951.

A. Object of the Conspiracy

3. It was part of the purpose and object of the conspiracy that Gasper, CLARKE T. BLIZZARD and others known to the United States Attorney agreed that Gasper would use his official position and influence at the OBWC to assist businesses with which CLARKE T. BLIZZARD was associated, employed by or represented, that managed or benefitted from the management of OBWC investment business and that obtained and maintained OBWC investment business in return for cash payments in the form of checks from CLARKE T. BLIZZARD provided directly and indirectly for the benefit of Gasper.

**B. Manner and Means of the Conspiracy**

4. The manner and means by which the conspiracy was carried out included, among others, the following:

5. From in or about November 1998 through in or about October 2004, the exact dates being unknown to the United States Attorney, in the Northern District of Ohio and elsewhere, CLARKE T. BLIZZARD, defendant herein, and others known to the United States Attorney, conspired, combined, confederated and agreed to obstruct, delay and affect commerce and the movement of an article and commodity in commerce through extortion, by Gasper obtaining, under color of official right, the property of another with his consent, to wit: that CLARKE T. BLIZZARD indirectly and directly provided property, in the form of checks, to Gasper, while Gasper was CFO of the OBWC in return for Gasper's official acts to assist CLARKE T. BLIZZARD in retaining and obtaining investment business involving the OBWC, on behalf of the businesses with which CLARKE T. BLIZZARD was associated, employed by or represented that managed or benefitted from the management of OBWC investment business.

**C. Overt Acts**

7. In furtherance of the conspiracy, and to achieve its object, one or more of the co-conspirators committed and caused to be committed overt acts in the Northern District of Ohio, Eastern Division, and elsewhere, including but not limited to the following:

8. On or about July 26, 2004, CLARKE T. BLIZZARD caused a \$9,005 check to be provided to the college that Gasper's son was attending for the payment of the son's "Fall '04 Tuition" while Gasper was CFO of the OBWC, in exchange for Gasper's exercise of his official influence, regarding OBWC investment dollars managed by certain corporate entities, including corporate entities which,

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during all relevant times, CLARKE T. BLIZZARD was associated with, employed by or represented that managed or benefitted from the management of OBWC investment business.

9. On or about April 11, 2002, CLARKE T. BLIZZARD issued a check for \$2,300 to the then girlfriend of Terry Gasper while Gasper was CFO of the OBWC which was intended to and did benefit Terry Gasper in that the check was deposited into Gasper's bank account, in exchange for Gasper's exercise of his official influence, regarding OBWC investment dollars managed by certain corporate entities, including corporate entities which, during all relevant times, either employed CLARKE T. BLIZZARD or owned a majority share of the entity which employed CLARKE T. BLIZZARD.

All in violation of Title 18, United States Code, Section 371.



GREGORY A. WHITE  
UNITED STATES ATTORNEY