

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

FILED  
DEC 02 2020  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
TOLEDO

UNITED STATES OF AMERICA,

Plaintiff,

v.

SCOTT ALLEN RENNINGER,

Defendant.

) INDICTMENT  
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CASE NO.

JUDGE ADAMS

5:20CR796

Title 18, United States Code,  
Section 1958

GENERAL ALLEGATIONS

At all times material and relevant to this Indictment:

Background

1. Defendant SCOTT ALLEN RENNINGER was a resident of Uniontown, Ohio, in Summit County, which was located in the Northern District of Ohio, Eastern Division.
2. Victim 1 was Defendant's spouse.
3. On or about June 23, 2020, Victim 1, through counsel, filed a Petition for Domestic Violence Civil Protection Order ("DVCPO") in Domestic Relations Court in Summit County, Ohio.
4. In the DVCPO, Victim 1 alleged that Defendant had engaged in acts of domestic violence, that included, among other acts, "Threats that he will not allow me to leave him alive."
5. Defendant caused a check to be issued from an investment account and made payable to himself, in the amount of \$100,000, and dated on or about June 29, 2020.
6. On or about August 6, 2020, Victim 1 filed for a divorce from Defendant.
7. CS-1 was a confidential source for the Federal Bureau of Investigation ("FBI").

8. CS-2 was a confidential source for the FBI.

9. In or around October 2020, Defendant offered CS-1 money in exchange for CS-1 killing Victim 1. Defendant provided CS-1 with a photograph of Victim 1, the vehicle and license plate information for Victim 1, and newspaper pages that included handwritten circles around numbers on a grocery store circular and handwritten circles around letters on a satellite dish circular that when read, revealed the house number and street name of Victim 1.

10. On or about October 5, 2020, Defendant discussed with CS-1 not wanting to have Victim 1's body found and stated, "With no body, they can't charge you."

11. On or about October 27, 2020, at CS-1's volition, Defendant discussed lowering the price of a house to \$300,000 and selling it to CS-1 as payment for killing Victim 1. After CS-1 asked Defendant, "You're gonna go \$300,000 on this house right here?" Defendant stated, "If you had her f-----g knocked off, and I don't have to pay you a f-----g nickel, f---k yeah, I would."

Excerpts of the October 30, 2020 recorded call between CS-1 and Defendant

12. On or about October 30, 2020, CS-1 initiated a recorded phone conversation with Defendant to set up a meeting between Defendant and CS-1's contact, a purported hit man who would kill Victim 1 for payment. During the conversation Defendant scolded CS-1 for sending Defendant a text stating that a "painter" wanted to meet with him. CS-1 had used the word "painter" as code for a hit man. Defendant told CS-1 that CS-1 now needed to find a painter in the Canton, Ohio area to call as cover during an anticipated law enforcement investigation. Defendant further explained to CS-1 that during investigations, law enforcement routinely investigated cellular telephone records to include text messages. Defendant told CS-1, "Unless

you want to go to f-----g jail with, with us, stop doing that s--t.” And then, “One f-----g mistake can unravel this.”

13. Defendant then stated that during the meeting with CS-1’s contact, Defendant would be wearing a mask and sunglasses. Regarding Defendant meeting with CS-1’s contact, CS-1 stated, “At least this way you could, you could, you could know s--t’s gonna go down.” Defendant said, “Ok...I’ve spent a thousand hours of my life watching these f-----g crime shows, cause I never knew, was like, well you never know when, you know, something like this is need [unintelligible].” CS-1 replied, “I’m just doing what you brought to me man.” Defendant replied, “I understand...but you’ve got to literally call a f-----g painter.”

Excerpts of November 4, 2020 recorded call between CS-1 and Defendant

14. On or about November 4, 2020, CS-1 initiated a recorded phone conversation with Defendant. CS-1 told Defendant that he knew someone that could murder Victim 1. In response Defendant said, “So you f-----g know for one-hundred percent sure he’s no f-----g undercover cop.”

15. Defendant expressed further concern about meeting the purported hit man in person and that he intended to wear a mask, glasses, and gloves because, “This is no joke, you know what I mean, we’ll all go to f-----g jail for conspiracy.”

16. During the conversation, Defendant added that he and the hit man needed to get “burner phones,” referring to cheap, disposable, prepaid, cellular phones.

Excerpts of November 4, 2020 recorded meeting between CS-1, CS-2, and Defendant

17. On or about November 4, 2020, CS-2 recorded a meeting with CS-1, CS-2, and Defendant to discuss the murder-for-hire.

18. CS-1 introduced Defendant to CS-2 in a parking lot. Defendant sat in CS-2's car and stated that they needed to figure out a way to communicate, possibly using burner phones.

19. Defendant asked CS-2 to drive out of the parking lot and said, "All these f-----g places have cameras man. Have you ever seen these shows when a woman gets abducted or gets heisted, they f-----g go to all these cameras? I'm not spending the rest of my life in prison for something stupid that can be avoided."

20. During the conversation CS-2 asked, "Are you sure you want to do this?" Defendant stated, "Yeah, I need to do it."

21. Later during the conversation CS-2 again asked, "I really want to know for sure, if you really want to do this...?" Defendant stated, "Yes."

22. Defendant told CS-2, "I watch the cop shows too, where you get set up, right? I know enough they give you an out, right? Are you sure you want to do this? And then you know, so that's why I want to make sure he [CS-1] can actually vouch for you, and you're not, you know, undercover."

23. CS-2 asked Defendant, "You got any kind of insurance on her?" Defendant stated, "There is some ... honestly, I think it's better if she disappears."

24. CS-2 asked Defendant, "What do you want me to do?" Defendant stated, "I mean hurting her, doesn't you know, I mean, I need to end the process of the divorce ..."

25. CS-2 asked Defendant, "You want me to make her where she doesn't come out anywhere? Defendant stated, "Yeah."

26. CS-2 asked, "You want her to disappear?" Defendant stated "Disappear exactly. That, would be best."

27. Defendant discussed paying CS-2 and stated "You obviously got to get paid, I get that ok, and so that's first and foremost ... The easiest thing would be is, if someone that is really not connected to me, you know, is able to provide that money."

28. Defendant told CS-2, "I understand, you know, this is not play time ..." CS-2 responded, "No, no, we're talking about somebody's life."

29. CS-2 asked Defendant about the age of Victim 1. Defendant stated, "She's 49 ... so she has a 50<sup>th</sup> birthday coming up in uh, early part of the year. CS-2 responded, "Well, I don't think she's going to make it." Defendant stated, "Yeah, well ... I kept thinking...maybe she'd catch COVID, right? Then it's not good for you necessarily, but you know to me, ... that would be one of the best things to happen, right? A little COVID issue."

30. At the end of the meeting Defendant and CS-2 agreed to meet again on November 11. In the interim, they agreed that CS-2 would purchase two burner phones for future communications.

Excerpts of November 11, 2020 recorded meeting between CS-2 and Defendant

31. On or about November 11, 2020, CS-2 recorded a meeting with Defendant to discuss the murder-for-hire. Defendant stated, "We all got to have our f-----g stories straight ... There's the little details they might seem like they're minor, or I'm being paranoid, but that's the kind of s--t that separates whether you f----g spend the rest of your life in jail or you know, you get away with it."

32. CS-2 provided Defendant with one of the burner phones. In each other's presence, Defendant and CS-2 both placed calls to one another to make sure the phones worked.

33. During the meeting, CS-2 stated, "Now we're gonna have to talk about a little price. I know you knew that was coming." Defendant replied, "Right." Defendant added that he understood he was paying for a service and would definitely pay for it.

34. Turning to the exact price, CS-2 asked Defendant, "Let me ask you this, how's \$20,000 sound?" Defendant replied, "Uh, that's uh, that's doable."

35. To confirm, CS-2 asked, "So \$20,000 is fine with you then?" Defendant replied, "Yes."

36. After confirming the price, Defendant stated "This is a serious thing." CS-2 responded, "Of course it's a serious thing. We're taking somebody's life."

37. Defendant stated, "Again the most important thing for me is ... second to getting it done, is ... I like my freedom, you know what I mean, I don't look good in stripes. So ... that's why it kind of works out well, that, you know, there's no way I would know you, right? I mean that's the other way people normally get caught is right is they go and ask other people. Hey, you know anyone who can help me knock my wife off? You know what I mean, it's kind of a hard thing to advertise."

38. Defendant and CS-2 discussed the timing of the murder-for-hire. Defendant told CS-2, "I would like to be out of town ... I'd like to have an alibi." CS-2 responded that he could give Defendant notice a week in advance of the murder-for-hire.

39. Defendant told CS-2, "Make sure it's her, watch her go into the house whatever, make sure you know, catch her going in so you know you got the right, the right person."

40. After the meeting with Defendant and CS-2 ended, CS-2, placed a consensually monitored telephone call from CS-2's burner phone to Defendant's burner phone. Defendant answered the call and spoke with CS-2 to confirm the burner phones worked.

COUNT 1

(Use of Interstate Commerce Facilities in the Commission of Murder-for-Hire,  
18 U.S.C. § 1958)

The Grand Jury charges:

41. Paragraphs 1 through 40 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

42. From in or around October 2020 to on or about November 17, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant, knowingly used and caused another to use a facility of interstate commerce, namely cellular telephones, with the intent that the murder of Victim 1 be committed in violation of the laws of the State of Ohio, as consideration for a promise and agreement to pay anything of pecuniary value, to wit: \$20,000, in violation of Title 18, United States Code, Section 1958.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.