

STATE OF INDIANA

v.

TODD C LEARY

IN THE HAMILTON SUPERIOR COURT 4

ss:

CAUSE NO. 29D04-2509-F6-008278 FILED

May 26, 2026

CLERK OF THE HAMILTON  
CIRCUIT COURT

**PLEA AGREEMENT**

The State of Indiana, by Deputy Prosecuting Attorney Whitney Fritz, the Defendant, Todd C Leary, and his attorney, Andrew J. Dollard, all agree to the following:

Should Leary enter a plea of guilty to the following charges and if the Court accepts this plea agreement, then the Court shall sentence Leary as follows:

Count 1, Fraud, a Level 6 Felony

910 days in the Indiana Department of Correction, 6 days executed, 904 days suspended. Executed time to be served in the Hamilton County Jail. Defendant has 6 days credit for 3 days already served (10/09/2025-10/11/2025). Court costs of \$189.00 are imposed.

Defendant to pay restitution to Matthew Barebel in the amount of \$5,000 on the day of sentencing.

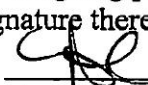
The Defendant shall be placed on probation for a period of 365 days, with all standard terms and conditions, subject to those the Court may impose, including payment of court costs, fines, and fees.

The State will move to dismiss remaining counts 2-10 under this cause.

Having read and understood this entire PLEA AGREEMENT as well as having read, understood, and initialed and signed MISDEMEANOR AND LEVEL 6 FELONY ADVISEMENT FORM, Defendant hereby agrees with and signs this agreement and further states that all this is done intelligently, knowingly, and voluntarily after consultation with his attorney on 5/26, 2026

  
Todd C Leary

The above agreement has been read and approved by the Attorney for the Defendant. By Dollard's signature, defense counsel acknowledges that Dollard has discussed the foregoing provisions with the Defendant and that the Defendant has indicated approval by placing his or her signature thereto.

  
Andrew J. Dollard, 28949-29

Approved by Deputy Prosecuting Attorney Fritz on March 5, 2026.

/s/ Whitney Fritz

Whitney Fritz, 30544-49