

IN THE COURT OF COMMON PLEAS  
WARREN COUNTY, OHIO  
CRIMINAL DIVISION

2013 OCT 28 AM 11:09

JOHN S. L. STATH  
CLERK OF COURTS

STATE OF OHIO

: Case No.

:

: Judge

v.

:

: INDICTMENT

: Charges:

LARRY COBB,

:

: [Count 1]

Defendant.

: Engaging in a Pattern of Corrupt Activities  
(F1) R.C. 2923.32(A)(1);

:

: [Count 2]

: Conspiracy to Engage in a Pattern of Corrupt  
Activities (F2), R.C. 2923.01(A);

:

: [Counts 3 through 11]

: Burglary (F2), R.C. 2911.12(A)(1);

:

: [Counts 12 through 16]

: Money Laundering (F3), R.C. 1315.55(A)(1);

:

: [Count 17]

: Misuse of Credit Cards (F4), R.C.  
2913.21(B)(2);

State of Ohio )

)

Warren County )

THE JURORS OF THE GRAND JURY OF THE STATE OF OHIO, within and for the body  
of the County aforesaid, on their oaths, in the name and by the authority of the State of Ohio, do find  
and present:

**I. GENERAL ALLEGATIONS**

- 1) Beginning on or about May 1, 2012, **LARRY D. COBB** ("Cobb"), formed an organized criminal enterprise with several other individuals. The goal of the criminal enterprise and associated conspiracy was for Larry Cobb to gain entry into occupied offices around Ohio

during work hours and steal credit cards, cash, and other items that had been left unattended within the office building.

- 2) In order to gain entry, Cobb would dress in business casual attire with a blank identification card around his neck. Often, Cobb would carry a portfolio or briefcase with him in order to blend in with the other employees. He employed many different methods of stealth and/or deception in order to get through locked doors or security checkpoints. Typically, Cobb would try to gain entry around the lunch hour or other times when employees were likely to be away from their desk.
- 3) Once inside a building, Cobb would target the offices of employees who were away from their desk. Cobb would look for purses or wallets left in desk drawers and would take credit cards, cash, drivers' licenses, and other items. Typically, Cobb would leave the purse or wallet after removing the items in order to delay discovery of his crimes.
- 4) Once Cobb obtained the credit cards, he would usually pass them to one or more of his co-conspirators. Cobb then instructed the co-conspirators to take the stolen credit cards to retail stores in the area and purchase electronics, gift cards, and other items. Co-conspirators would quickly purchase as many expensive items as possible before the victim reported their credit cards stolen, sometimes buying thousands of dollars worth of gift cards and/or electronics before the cards were disabled or reported stolen.
- 5) After obtaining items with the stolen credit cards, Cobb and his co-conspirators would typically sell the items to individuals and/or pawn shops in order to turn the stolen merchandise into cash. Cobb paid his co-conspirators a share of the money and kept the rest of the proceeds for himself. During the course of the conspiracy, Cobb and his co-conspirators used the stolen credit cards to obtain or attempt to obtain approximately \$100,000.00 in merchandise. Cobb and his co-conspirators committed multiple criminal acts in Warren County and at least eight other counties around Ohio.

**COUNT ONE**

***ENGAGING IN A PATTERN OF CORRUPT ACTIVITIES***

***R.C. 2923.32***

**Defendant:** LARRY D. COBB

**Offense Date:** During a period of time beginning on or about May 1, 2012, the exact date being unknown, and ending on a date not later than January 9, 2013.

**Offense Level:** First Degree Felony

**Predicate Offenses:** -- Burglary – R.C. 2911.12; a felony of the second degree;  
-- Money Laundering – R.C. 1315.55(A)(1); a felony of the third degree  
-- Misuse of Credit Cards – R.C. 2913.21(B)(2); a felony of the fourth degree  
-- Theft – R.C. 2913.02; a felony of the fifth degree

- 1) During a period of time beginning on or about May 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, in Warren County, Ohio and elsewhere in a manner invoking the jurisdiction and venue of Warren County, Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **LARRY D. COBB**, being associated with an enterprise, violated Section 2923.32(A)(1) of the Ohio Revised Code in that they did, knowingly, conduct and participate directly and indirectly in conduct of such enterprise's affairs in a pattern of corrupt activity, as defined in Ohio Revised Code Section 2923.31(A), a felony of the first degree.
- 2) The enterprise, as defined in Ohio Revised Code Section 2923.31, consisted of persons both known and unknown to the grand jury, including namely, Larry D. Cobb, Deshawn Mitchell, Jodie Petty, Kristina Petty, and other persons.
- 3) The enterprise engaged in illicit enterprises out of Warren County, Ohio and elsewhere, associated in fact with a common purpose to, by force, stealth, or deception, trespass in occupied structures, or in a separately secured or separately occupied portion of occupied structures, when a person, other than an accomplice of the offender, was present, with purpose to commit therein criminal offenses; to conduct transactions knowing that property involved was the proceeds of unlawful activity for the purpose of committing and furthering corrupt activity; to obtain property by the use of a credit card in one or more transactions, knowing that the card was obtained in violation of the law with a purpose to defraud; and with the purpose to deprive the owner of property, did knowingly obtain and exert control over said property without the consent of the owners or any person authorized to give

consent, and did commit these acts in violation of Ohio Revised Code Sections 2911.12, 1315.55, 2913.21, and 2913.02, all being felonies.

- 4) **LARRY D. DOBB**, conducted and participated directly and indirectly in the conduct of such enterprise's affairs through a pattern of corrupt activity consisting of burglary, money laundering, misuse of credit cards, and theft and/or attempts thereof which are punishable under the laws of the State of Ohio through Ohio Revised Code Sections 2911.12, 1315.55, 2913.21, and 2913.02, all being felonies.
- 5) The pattern of corrupt activity referred to in Paragraphs 1-4 above committed by said offender includes, but is not limited to, two or more incidents of the following corrupt activities, whether or not there has been a prior conviction, that are related to the affairs of the same enterprise, are not isolated and are not so closely related to each other and connected in time and place that they constitute a single event by engaging in, attempting to engage in, conspiring to engage in, soliciting, coercing, or intimidating another to engage in any of the following:
  - A. **LARRY D. COBB** did knowingly, during a period of time beginning on or about May 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, in Warren County, Ohio, and elsewhere, through a continuing course of conduct involving two or more occasions, not isolated and not so closely related to each other and connected in time and place that they constitute a single event, by force, stealth, or deception, trespass in an occupied structure, or in a separately secured or separately occupied portion of an occupied structure, when a person, other than an accomplice of the offender, was present, with purpose to commit therein criminal offenses, in violation of Ohio Revised Code Section 2911.12, each being a felony of the second degree.
  - B. **LARRY D. COBB** did knowingly on two or more occasions, not isolated and not so closely related to each other and connected in time and place that they constitute a single event, during a period of time beginning on or about May 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, conduct transactions knowing that property was the proceeds of unlawful activity for the purpose of committing and furthering corrupt activity, each in violation of Ohio Revised Code Section 1315.55(A)(1), each being a felony of the third degree.
  - C. **LARRY D. COBB** did knowingly on two or more occasions, not isolated and not so closely related to each other and connected in time and place that they constitute a single event, during a period of time beginning on or about May 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, acting either as a principle offender or as an accomplice, obtain property by the use of a credit card in one or more transactions, knowing that the card was

obtained in violation of the law with a purpose to defraud, in violation of R.C. 2913.21(B)(2); a felony of the fourth degree

- D. **LARRY D. COBB** did knowingly, during a period of time beginning on or about May 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, in Warren County, Ohio, and elsewhere, through a continuing course of conduct involving two or more occasions, not isolated and not so closely related to each other and connected in time and place that they constitute a single event, obtain control over property, namely credit cards, cash, and merchandise, of another with purpose to deprive the owners thereof by deception, each in violation of Ohio Revised Code Section 2913.02(A)(3), being a felony of the fifth degree.

In violation of Ohio Revised Code Section 2923.32(A)(1), all against the Peace and Dignity of the State of Ohio.

**COUNT TWO**  
***CONSPIRACY***  
***R.C. 2923.01***

**Defendants:**            **LARRY D. COBB**

**Offense Date:**        **During a period of time, the specific dates of said conduct being unknown, beginning on or about May 1, 2012 and ending on a date a date not later than January 9, 2013**

**Offense Level:**        **Second Degree Felony**

- 1) During a period of time, the specific dates of said conduct being unknown, beginning on or about May 1, 2012 and ending on a date a date not later than January 9, 2013, in Warren County, Ohio and elsewhere in a manner invoking the jurisdiction and venue of Warren County, Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Larry D. Cobb, did with purpose to commit, promote or facilitate the commission of Engaging in a Pattern of Corrupt Activities, agree with **DESHAWN MITCHELL, JODIE PETTY, KRISTINA PETTY**, and/or other persons, that one or more of them would engage in conduct which facilitates the commission of such offense, a substantial overt act in furtherance of the said conspiracy having been done by **LARRY D. COBB**, or a person with whom he conspired, subsequent to his entrance into the conspiracy;

In violation of Ohio Revised Code Section 2923.01, against the Peace and Dignity of the State of Ohio.

**COUNT THREE**

*BURGLARY*

*R.C. 2911.12*

**Defendant:** LARRY COBB  
**Offense Date:** June 18, 2012  
**Offense Level:** Second Degree Felony

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about June 18, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, LARRY COBB did by force, stealth, or deception, trespass in the Fiserv, Inc. building located at 6000 Perimeter Drive, Dublin, Ohio, an occupied structure, or in a separately secured or separately occupied portion of an occupied structure, when a person, other than an accomplice of the offender, was present, with purpose to commit therein a criminal offense, in violation of Ohio Revised Code Section 2911.12(A)(1), being a felony of the second degree.

In violation of Ohio Revised Code Section 2911.12(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT FOUR**

*BURGLARY*

*R.C. 2911.12*

**Defendant:** LARRY COBB  
**Offense Date:** June 20, 2012  
**Offense Level:** Second Degree Felony

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about June 20, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, LARRY COBB did by force, stealth, or deception, trespass in the Cleveland Clinic Administrative Center located at 3050 Science Park Drive, Beachwood, Ohio, an occupied structure, or in a separately secured or separately occupied portion of an

occupied structure, when a person, other than an accomplice of the offender, was present, with purpose to commit therein a criminal offense, in violation of Ohio Revised Code Section 2911.12(A)(1), being a felony of the second degree.

In violation of Ohio Revised Code Section 2911.12(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT FIVE**

*BURGLARY*

*R.C. 2911.12*

**Defendant:** LARRY COBB

**Offense Date:** July 9, 2012

**Offense Level:** Second Degree Felony

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about July 9, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **LARRY COBB** did by force, stealth, or deception, trespass in the AHUJA Medical Center located at 3999 Richmond Road, Beachwood, Ohio 44122, an occupied structure, or in a separately secured or separately occupied portion of an occupied structure, when a person, other than an accomplice of the offender, was present, with purpose to commit therein a criminal offense, in violation of Ohio Revised Code Section 2911.12(A)(1), being a felony of the second degree.

In violation of Ohio Revised Code Section 2911.12(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT SIX**  
***BURGLARY***  
***R.C. 2911.12***

**Defendant:**           **LARRY COBB**  
**Offense Date:**       **July 17, 2012**  
**Offense Level:**       **Second Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about July 17, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, LARRY COBB did by force, stealth, or deception, trespass in the Proctor and Gamble building located at 8340 Mason-Montgomery Road, Mason, Ohio 45040, an occupied structure, or in a separately secured or separately occupied portion of an occupied structure, when a person, other than an accomplice of the offender, was present, with purpose to commit therein a criminal offense, in violation of Ohio Revised Code Section 2911.12(A)(1), being a felony of the second degree.

In violation of Ohio Revised Code Section 2911.12(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT SEVEN**  
***BURGLARY***  
***R.C. 2911.12***

**Defendant:**           **LARRY COBB**  
**Offense Date:**       **August 17, 2012**  
**Offense Level:**       **Second Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about August 17, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, LARRY COBB did by force, stealth, or deception, trespass in the Farmers Insurance building located at 5990 West Creek Road Independence, Ohio, an



occupied structure, or in a separately secured or separately occupied portion of an occupied structure, when a person, other than an accomplice of the offender, was present, with purpose to commit therein a criminal offense, in violation of Ohio Revised Code Section 2911.12(A)(1), being a felony of the second degree.

In violation of Ohio Revised Code Section 2911.12(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT EIGHT**

*BURGLARY*

*R.C. 2911.12*

**Defendant:**            **LARRY COBB**

**Offense Date:**        **September 4, 2012**

**Offense Level:**        **Second Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about September 4, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, LARRY COBB did by force, stealth, or deception, trespass in the Step 2 building located at 10010 Aurora Hudson Road Streetsboro, Ohio, an occupied structure, or in a separately secured or separately occupied portion of an occupied structure, when a person, other than an accomplice of the offender, was present, with purpose to commit therein a criminal offense, in violation of Ohio Revised Code Section 2911.12(A)(1), being a felony of the second degree.

In violation of Ohio Revised Code Section 2911.12(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT NINE**

*BURGLARY*

*R.C. 2911.12*

**Defendant:** LARRY COBB  
**Offense Date:** September 12, 2012  
**Offense Level:** Second Degree Felony

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about September 12, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, LARRY COBB did by force, stealth, or deception, trespass in the Akron General Health and Wellness Center located at 4125 Medina Road Bath, Ohio, an occupied structure, or in a separately secured or separately occupied portion of an occupied structure, when a person, other than an accomplice of the offender, was present, with purpose to commit therein a criminal offense, in violation of Ohio Revised Code Section 2911.12(A)(1), being a felony of the second degree.

In violation of Ohio Revised Code Section 2911.12(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT TEN**

*BURGLARY*

*R.C. 2911.12*

**Defendant:** LARRY COBB  
**Offense Date:** September 18, 2012  
**Offense Level:** Second Degree Felony

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about September 12, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, LARRY COBB did by force, stealth, or deception, trespass in

the Richard E. Jacobs Health Center located at 33100 Cleveland Clinic Boulevard Avon, Ohio, an occupied structure, or in a separately secured or separately occupied portion of an occupied structure, when a person, other than an accomplice of the offender, was present, with purpose to commit therein a criminal offense, in violation of Ohio Revised Code Section 2911.12(A)(1), being a felony of the second degree.

In violation of Ohio Revised Code Section 2911.12(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT ELEVEN**

*BURGLARY*

*R.C. 2911.12*

**Defendant:**            **LARRY COBB**

**Offense Date:**        **October 4, 2012**

**Offense Level:**        **Second Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about October 4, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, LARRY COBB did by force, stealth, or deception, trespass in the St. Elizabeth Health Center located at 1044 Belmont Avenue Youngstown, Ohio, an occupied structure, or in a separately secured or separately occupied portion of an occupied structure, when a person, other than an accomplice of the offender, was present, with purpose to commit therein a criminal offense, in violation of Ohio Revised Code Section 2911.12(A)(1), being a felony of the second degree.

In violation of Ohio Revised Code Section 2911.12(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT TWELVE**  
***MONEY LAUNDERING***  
***R.C. 2911.12***

**Defendant:**            **LARRY COBB**

**Offense Date:**        **June 7, 2012**

**Offense Level:**        **Third Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about June 7, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, LARRY COBB did conduct a transaction knowing that property was the proceeds of unlawful activity, to wit: using the credit card of Amy Cisco and/or Vanessa Rose Nyanzi, with the purpose of committing and furthering corrupt activity, in violation of Ohio Revised Code Section 1315.55(A)(1), being a felony of the third degree.

In violation of Ohio Revised Code Section 1315.55(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT THIRTEEN**  
***MONEY LAUNDERING***  
***R.C. 2911.12***

**Defendant:**            **LARRY COBB**

**Offense Date:**        **July 12, 2012**

**Offense Level:**        **Third Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about July 12, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, LARRY COBB did conduct a transaction knowing that property was the proceeds of unlawful activity, to wit: using the credit card of Sandra Hall, Gregory Hart, Pam Blauch, Cindy Tran, and/or Bob Rogers, with the purpose of committing and furthering corrupt activity, in violation of Ohio Revised Code Section 1315.55(A)(1), being a felony of the third degree.

In violation of Ohio Revised Code Section 1315.55(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT FOURTEEN**  
*MONEY LAUNDERING*  
*R.C. 2911.12*

**Defendant:**            **LARRY COBB**

**Offense Date:**        **July 17, 2012**

**Offense Level:**        **Third Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about July 17, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, LARRY COBB did conduct a transaction knowing that property was the proceeds of unlawful activity, to wit: using the credit card of Kay Morris, Kimberly Buckman, and/or Elizabeth Keith, with the purpose of committing and furthering corrupt activity, in violation of Ohio Revised Code Section 1315.55(A)(1), being a felony of the third degree.

In violation of Ohio Revised Code Section 1315.55(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT FIFTEEN**  
*MONEY LAUNDERING*  
*R.C. 2911.12*

**Defendant:**            **LARRY COBB**

**Offense Date:**        **July 31, 2012**

**Offense Level:**        **Third Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about July 31, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, LARRY COBB did conduct a transaction knowing that property was the proceeds of unlawful activity, to wit: using the credit card of John Beck, with the purpose of committing and furthering corrupt activity, in violation of Ohio Revised Code Section 1315.55(A)(1), being a felony of the third degree.

In violation of Ohio Revised Code Section 1315.55(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT SIXTEEN**  
*MONEY LAUNDERING*  
*R.C. 2911.12*

**Defendant:** LARRY COBB  
**Offense Date:** January 9, 2013  
**Offense Level:** Third Degree Felony

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about January 9, 2013, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, LARRY COBB did conduct a transaction knowing that property was the proceeds of unlawful activity, to wit: using the credit card of Carol Gottlieb-King, with the purpose of committing and furthering corrupt activity, in violation of Ohio Revised Code Section 1315.55(A)(1), being a felony of the third degree.

In violation of Ohio Revised Code Section 1315.55(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT SEVENTEEN**  
*MISUSE OF CREDIT CARDS*  
*R.C. 2913.21*

**Defendant:** LARRY COBB  
**Offense Date:** June 7, 2012 - September 7, 2012  
**Offense Level:** Fourth Degree Felony

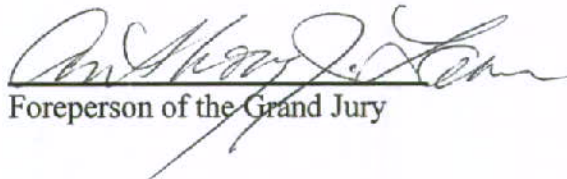
- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about June 7, 2012 – September 7, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **LARRY COBB** did, with purpose to defraud, obtain property or services by use of a credit card, in one or more transactions,

knowing or having reasonable cause to believe that the card has expired or been revoked, or was obtained, is retained, or is being used in violation of law, to wit: **LARRY COBB**, during a period of ninety consecutive days commencing on the date of the first violation, obtained property worth more than seven thousand five hundred dollars but less than one hundred and fifty thousand dollars in violation of Ohio Revised Code Section 2913.21(B)(2), being a felony of the fourth degree.

In violation of Ohio Revised Code Section 2913.21(B)(2), against the Peace and Dignity of the State of Ohio.

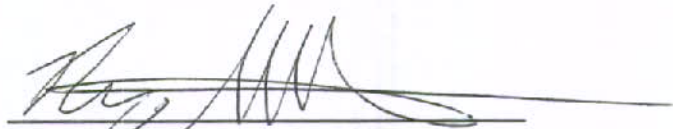
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This Bill of Indictment found upon testimony sworn and sent before the Grand Jury at the Request of the Prosecuting Attorney.



Foreperson of the Grand Jury

**DAVID P. FORNSHELL**  
Warren County Prosecuting Attorney



**Ryan M. Stubenrauch (0083963)**  
**Marianne T. Hemmeter (0068896)**  
**Jonathan D. Blanton (0070035)**  
Special Assistant Prosecuting Attorneys  
Office of the Ohio Attorney General  
30 E. Broad Street, 14<sup>th</sup> Floor  
Telephone – 614-466-7828  
Facsimile – 866-771-4241  
[ryan.stubenrauch@ohioattorneygeneral.gov](mailto:ryan.stubenrauch@ohioattorneygeneral.gov)

COMMON PLEAS COURT

SEPTEMBER, 2013 CASE NO.

WARREN COUNTY, OHIO

THE STATE OF OHIO VS. LARRY COBB

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FILED: October 28, 2013 James L. Spaeth CLERK

BY: \_\_\_\_\_ DEPUTY CLERK

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THE STATE OF OHIO, WARREN COUNTY.

I, the undersigned, Clerk of the Court of Common Pleas in and for said County, do hereby certify that the foregoing is a full, true and correct copy of the original indictment, with the endorsements thereon, now on file in my office.

WITNESS MY HAND AND SEAL OF SAID COURT,  
AT

Lebanon, Ohio, this

28<sup>th</sup> day of October 2013

\_\_\_\_\_  
James L. Spaeth Clerk

BY: \_\_\_\_\_ Deputy

**NOTICE TO APPEAR**

LARRY COBB, YOU HAVE BEEN INDICTED BY THE GRAND JURY OF WARREN COUNTY, OHIO, AND YOU ARE HEREBY ORDERED TO PERSONALLY APPEAR AT 8:30 A.M. ON NOVEMBER 15, 2013 AT THE COMMON PLEAS COURT 500 JUSTICE DRIVE, LEBANON, OHIO, OR IF YOU ARE INCARCERATED, YOU WILL BE SCHEDULED FOR A VIDEO ARRAIGNMENT, AND THAT FAILURE TO APPEAR WILL RESULT IN A WARRANT FOR ARREST, FORFEITURE OF BOND, IF ANY, OR ADDITIONAL CRIMINAL CHARGES FOR FAILURE TO APPEAR UNDER REVISED CODE 2937.99.



IN THE COURT OF COMMON PLEAS  
WARREN COUNTY, OHIO  
CRIMINAL DIVISION

COMMON PLEAS COURT  
WARREN COUNTY, OHIO

2013 OCT 28 AM 11:10

STEPHEN L. SPAETH  
CLERK OF COURTS

STATE OF OHIO : Case No.  
: :  
: Judge  
v. : :  
: INDICTMENT  
: Charges:  
JODIE PETTY, : :  
: [Count 1]  
Defendant. : Engaging in a Pattern of Corrupt Activities  
: (F2) R.C. 2923.32(A)(1);  
: :  
: [Count 2]  
: Conspiracy to Engage in a Pattern of Corrupt  
: Activities (F3), R.C. 2923.01(A);  
: :  
: [Counts 3 through 7]  
: Receiving Stolen Property (F5), R.C.  
: 2913.51(A);  
: :  
: [Count 8]  
: Misuse of Credit Cards (F5), R.C.  
: 2913.21(B)(1);

State of Ohio )  
)  
Warren County )

THE JURORS OF THE GRAND JURY OF THE STATE OF OHIO, within and for the body of the County aforesaid, on their oaths, in the name and by the authority of the State of Ohio, do find and present:

## GENERAL ALLEGATIONS

- 1) Beginning on or about May 1, 2012, **LARRY D. COBB** ("**COBB**"), formed an organized criminal enterprise with several other individuals. The goal of the criminal enterprise and associated conspiracy was for **COBB** to gain entry into occupied offices around Ohio during work hours and steal credit cards, cash, and other items that had been left unattended within the office building.
- 2) In order to gain entry, **COBB** would dress in business casual attire with a blank identification card around his neck. Often, **COBB** would carry a portfolio or briefcase with him in order to blend in with the other employees. He employed many different methods of stealth and/or deception in order to get through locked doors or security checkpoints. Typically, **COBB** would try to gain entry around the lunch hour or other times when employees were likely to be away from their desk.
- 3) Once inside a building, **COBB** would target the offices of employees who were away from their desk. **COBB** would look for purses or wallets left in desk drawers and would take credit cards, cash, drivers' licenses, and other items. Typically, **COBB** would leave the purse or wallet after removing the items in order to delay discovery of his crimes.
- 4) Once **COBB** obtained the credit cards, he would usually pass them to one or more of his co-conspirators, including **JODIE PETTY**. **COBB** then instructed the co-conspirators to take the stolen credit cards to retail stores in the area and purchase electronics, gift cards, and other items. Co-conspirators would quickly purchase as many expensive items as possible before the victim reported their credit cards stolen, sometimes buying thousands of dollars worth of gift cards and/or electronics before the cards were disabled or reported stolen.
- 5) After obtaining items with the stolen credit cards, **COBB** and his co-conspirators would typically sell the items to individuals and/or pawn shops in order to turn the stolen merchandise into cash. **COBB** paid his co-conspirators a share of the money and kept the rest of the proceeds for himself. During the course of the conspiracy, **COBB** and his co-conspirators used the stolen credit cards to obtain or attempt to obtain approximately \$100,000.00 in merchandise. Cobb and his co-conspirators committed multiple criminal acts in Warren County and at least eight other counties around Ohio.

**COUNT ONE**  
*ENGAGING IN A PATTERN OF CORRUPT ACTIVITIES*  
*R.C. 2923.32*

**Defendant:** JODIE PETTY

**Offense Date:** During a period of time beginning on or about May 1, 2012, the exact date being unknown, and ending on a date not later than January 9, 2013.

**Offense Level:** Second Degree Felony

**Predicate Offenses:**

- Misuse of Credit Cards – R.C. 2913.21(B)(2); a felony of the fourth degree
- Receiving Stolen Property – R.C. 2913.51; a felony of the fifth degree

- 1) During a period of time beginning on or about May 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, in Warren County, Ohio and elsewhere in a manner invoking the jurisdiction and venue of Warren County, Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **JODIE PETTY**, being associated with an enterprise, violated Section 2923.32(A)(1) of the Ohio Revised Code in that they did, knowingly, conduct and participate directly and indirectly in conduct of such enterprise's affairs in a pattern of corrupt activity, as defined in Ohio Revised Code Section 2923.31(A), a felony of the second degree.
- 2) The enterprise, as defined in Ohio Revised Code Section 2923.31, consisted of persons both known and unknown to the grand jury, including namely, **LARRY D. COBB, DESHAWN MITCHELL, JODIE PETTY, KRISTINA PETTY**, and other persons.
- 3) The enterprise engaged in illicit enterprises out of Warren County, Ohio and elsewhere, associated in fact with a common purpose to obtain property by the use of a credit card in one or more transactions, knowing that the card was obtained in violation of the law with a purpose to defraud; to receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense, and did commit these acts in violation of Ohio Revised Code Sections 2913.21, and 2913.51, all being felonies.
- 4) **JODIE PETTY**, conducted and participated directly and indirectly in the conduct of such enterprise's affairs through a pattern of corrupt activity consisting of Misuse of Credit Cards and Receiving Stolen Property and/or attempts thereof which are punishable under the laws of the State of Ohio through Ohio Revised Code Sections 2913.21 and 2913.51, both being

felonies.

- 5) The pattern of corrupt activity referred to in Paragraphs 1-4 above committed by said offender includes, but is not limited to, two or more incidents of the following corrupt activities, whether or not there has been a prior conviction, that are related to the affairs of the same enterprise, are not isolated and are not so closely related to each other and connected in time and place that they constitute a single event by engaging in, attempting to engage in, conspiring to engage in, soliciting, coercing, or intimidating another to engage in any of the following:
  - A. **JODIE PETTY** did knowingly on two or more occasions, not isolated and not so closely related to each other and connected in time and place that they constitute a single event, during a period of time beginning on or about May 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, acting either as a principle offender or as an accomplice, obtain property by the use of a credit card in one or more transactions, knowing that the card was obtained in violation of the law with a purpose to defraud, in violation of R.C. 2913.21(B)(2); a felony of the fifth degree.
  - B. **JODIE PETTY** did knowingly, during a period of time beginning on or about May 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, in Warren County, Ohio, and elsewhere, through a continuing course of conduct involving two or more occasions, not isolated and not so closely related to each other and connected in time and place that they constitute a single event, receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense, each in violation of Ohio Revised Code Section 2913.51(A), being a felony of the fifth degree.

In violation of Ohio Revised Code Section 2923.32(A)(1), all against the Peace and Dignity of the State of Ohio.

**COUNT TWO**  
**CONSPIRACY**  
*R.C. 2923.01*

**Defendants:**           **JODIE PETTY**

**Offense Date:**       **During a period of time, the specific dates of said conduct being unknown, beginning on or about May 1, 2012 and ending on a date a date not later than January 9, 2013**

**Offense Level:**      **Third Degree Felony**

- 1) During a period of time, the specific dates of said conduct being unknown, beginning on or about May 1, 2012 and ending on a date a date not later than January 9, 2013, in Warren County, Ohio and elsewhere in a manner invoking the jurisdiction and venue of Warren County, Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **JODIE PETTY**, did with purpose to commit, promote or facilitate the commission of Engaging in a Pattern of Corrupt Activities, agree with **LARRY COBB, DESHAWN MITCHELL, KRISTINIA PETTY**, and/or other persons, that one or more of them would engage in conduct which facilitates the commission of such offense, a substantial overt act in furtherance of the said conspiracy having been done by **JODIE PETTY**, or a person with whom she conspired, subsequent to her entrance into the conspiracy;

In violation of Ohio Revised Code Section 2923.01, against the Peace and Dignity of the State of Ohio.

**COUNT THREE**  
*RECEIVING STOLEN PROPERTY*  
*R.C. 2911.12*

**Defendant:**            **JODIE PETTY**

**Offense Date:**        **August 15, 2012**

**Offense Level:**        **Fifth Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about August 15, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **JODIE PETTY** did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense, to wit: **JODIE PETTY** received a stolen credit card belonging to Ann Wilson in violation of Ohio Revised Code Section 2913.51(A), being a felony of the fifth degree

In violation of Ohio Revised Code Section 2913.51(A), against the Peace and Dignity of the State of Ohio.

**COUNT FOUR**  
*RECEIVING STOLEN PROPERTY*  
*R.C. 2911.12*

**Defendant:**            **JODIE PETTY**

**Offense Date:**        **August 24, 2012**

**Offense Level:**        **Fifth Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about August 24, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **JODIE PETTY** did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense, to wit: **JODIE PETTY** received a stolen credit card belonging to Amy Fenderson, and/or Linda Ganyard, and/or Dana Szewczyk, and/or Don Kurti in violation of Ohio Revised Code Section 2913.51(A), being a felony of the fifth degree

In violation of Ohio Revised Code Section 2913.51(A), against the Peace and Dignity of the State of Ohio.

**COUNT FIVE**  
*RECEIVING STOLEN PROPERTY*  
*R.C. 2911.12*

**Defendant:** JODIE PETTY  
**Offense Date:** September 4, 2012  
**Offense Level:** Fifth Degree Felony

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about September 4, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **JODIE PETTY** did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense, to wit: **JODIE PETTY** received a stolen credit card belonging to Rise D. Edwards and/or Ann M. Laurie in violation of Ohio Revised Code Section 2913.51(A), being a felony of the fifth degree

In violation of Ohio Revised Code Section 2913.51(A), against the Peace and Dignity of the State of Ohio.

**COUNT SIX**  
*RECEIVING STOLEN PROPERTY*  
*R.C. 2911.12*

**Defendant:** JODIE PETTY  
**Offense Date:** September 12, 2012  
**Offense Level:** Fifth Degree Felony

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about September 12, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **JODIE PETTY** did receive, retain, or dispose of property of





another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense, to wit: **JODIE PETTY** received a stolen credit card belonging to Anessa A. Turek in violation of Ohio Revised Code Section 2913.51(A), being a felony of the fifth degree

In violation of Ohio Revised Code Section 2913.51(A), against the Peace and Dignity of the State of Ohio.

**COUNT SEVEN**  
*RECEIVING STOLEN PROPERTY*  
*R.C. 2911.12*

**Defendant:**            **JODIE PETTY**

**Offense Date:**        **September 18, 2012**

**Offense Level:**        **Fifth Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about September 18, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **JODIE PETTY** did receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense, to wit: **JODIE PETTY** received a stolen credit card belonging to Elizabeth Southworth in violation of Ohio Revised Code Section 2913.51(A), being a felony of the fifth degree

In violation of Ohio Revised Code Section 2913.51(A), against the Peace and Dignity of the State of Ohio.

**COUNT EIGHT**  
*MISUSE OF CREDIT CARDS*  
*R.C. 2913.21*

**Defendant:**            **JODIE PETTY**

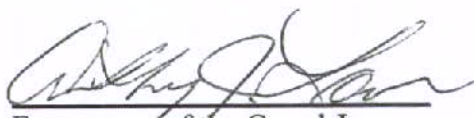
**Offense Date:**        **August 15, 2012 – November 8, 2012**

**Offense Level:**       **Fifth Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that between August 15, 2012, and November 13, 2012, a 90 day time period, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **JODIE PETTY** did, with purpose to defraud, obtain property or services by use of a credit card, in one or more transactions, knowing or having reasonable cause to believe that the card has expired or been revoked, or was obtained, is retained, or is being used in violation of law, to wit: **JODIE PETTY**, during a period of ninety consecutive days commencing on or about August 15, 2012, obtained property worth more than one thousand dollars but less than seven thousand five hundred dollars using stolen credit cards in violation of Ohio Revised Code Section 2913.21(B)(2), being a felony of the fifth degree.

In violation of Ohio Revised Code Section 2913.21(B)(2), against the Peace and Dignity of the State of Ohio.

This Bill of Indictment found upon testimony sworn and sent before the Grand Jury at the Request of the Prosecuting Attorney.

  
\_\_\_\_\_  
Foreperson of the Grand Jury

**DAVID P. FORNSHELL**  
Warren County Prosecuting Attorney

A handwritten signature in black ink, appearing to read 'Ryan M. Stubenrauch', written over a horizontal line.

**Ryan M. Stubenrauch (0083963)**

**Marianne T. Hemmeter (0068896)**

**Jonathan D. Blanton (0070035)**

Special Assistant Prosecuting Attorneys

Office of the Ohio Attorney General

30 E. Broad Street, 14<sup>th</sup> Floor

Telephone – 614-466-7828

Facsimile – 866-771-4241

**[ryan.stubenrauch@ohioattorneygeneral.gov](mailto:ryan.stubenrauch@ohioattorneygeneral.gov)**

COMMON PLEAS COURT

SEPTEMBER, 2013 CASE NO.

WARREN COUNTY, OHIO

THE STATE OF OHIO VS. JODIE PETTY

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FILED: October 28, 2013 James L. Spaeth CLERK  
BY: \_\_\_\_\_ DEPUTY CLERK

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THE STATE OF OHIO, WARREN COUNTY.

I, the undersigned, Clerk of the Court of Common Pleas in and for said County, do hereby certify that the foregoing is a full, true and correct copy of the original indictment, with the endorsements thereon, now on file in my office.

WITNESS MY HAND AND SEAL OF SAID COURT,  
AT

Lebanon, Ohio, this  
28<sup>th</sup> day of October 2013

\_\_\_\_\_  
James L. Spaeth Clerk

BY: \_\_\_\_\_ Deputy

**NOTICE TO APPEAR**

JODIE PETTY, YOU HAVE BEEN INDICTED BY THE GRAND JURY OF WARREN COUNTY, OHIO, AND YOU ARE HEREBY ORDERED TO PERSONALLY APPEAR AT 8:30 A.M. ON NOVEMBER 15, 2013 AT THE COMMON PLEAS COURT 500 JUSTICE DRIVE, LEBANON, OHIO, OR IF YOU ARE INCARCERATED, YOU WILL BE SCHEDULED FOR A VIDEO ARRAIGNMENT, AND THAT FAILURE TO APPEAR WILL RESULT IN A WARRANT FOR ARREST, FORFEITURE OF BOND, IF ANY, OR ADDITIONAL CRIMINAL CHARGES FOR FAILURE TO APPEAR UNDER REVISED CODE 2937.99.

IN THE COURT OF COMMON PLEAS  
WARREN COUNTY, OHIO  
CRIMINAL DIVISION

COMMON PLEAS COURT  
WARREN COUNTY, OHIO  
FILED  
2013 OCT 28 AM 11:11

JAMES L. JEAETH  
CLERK OF COURTS

STATE OF OHIO : Case No.  
: :  
: Judge  
v. :  
: INDICTMENT  
: Charges:  
DESHAWN MITCHELL, :  
: [Count 1]  
Defendant. : Engaging in a Pattern of Corrupt Activities  
: (F1) R.C. 2923.32(A)(1);  
: :  
: [Count 2]  
: Conspiracy to Engage in a Pattern of Corrupt  
: Activities (F2), R.C. 2923.01(A);  
: :  
: [Counts 3 through 7]  
: Money Laundering (F3), R.C. 1315.55(A)(1);  
: :  
: [Count 8]  
: Misuse of Credit Cards (F5), R.C.  
: 2913.21(B)(1)

State of Ohio )  
 )  
Warren County )

THE JURORS OF THE GRAND JURY OF THE STATE OF OHIO, within and for the body of the County aforesaid, on their oaths, in the name and by the authority of the State of Ohio, do find and present:

**I. GENERAL ALLEGATIONS**

- 1) Beginning sometime in June of 2012, Larry D. Cobb ("Cobb"), formed an organized criminal enterprise with several other individuals. The goal of the criminal enterprise and associated conspiracy was for Larry Cobb to gain entry into occupied offices around Ohio during work hours and steal credit cards, cash, and other items that had been left unattended within the office building.

- 2) In order to gain entry, Cobb would dress in business casual attire with a blank identification card around his neck. Often, Cobb would carry a portfolio or briefcase with him in order to blend in with the other employees. He employed many different methods of stealth and/or deception in order to get through locked doors or security checkpoints. Typically, Cobb would try to gain entry around the lunch hour or other times when employees were likely to be away from their desk.
- 3) Once inside a building, Cobb would target the offices of employees who were away from their desk. Cobb would look for purses or wallets left in desk drawers and would take credit cards, cash, drivers' licenses, and other items. Typically, Cobb would leave the purse or wallet after removing the items in order to delay discovery of his crimes.
- 4) Once Cobb obtained the credit cards, he would usually pass them to one or more of his co-conspirators. Cobb then instructed the co-conspirators to take the stolen credit cards to retail stores in the area and purchase electronics, gift cards, and other items. Co-conspirators would quickly purchase as many expensive items as possible before the victim reported their credit cards stolen, sometimes buying thousands of dollars worth of gift cards and/or electronics before the cards were disabled or reported stolen.
- 5) After obtaining items with the stolen credit cards, Cobb and his co-conspirators would typically sell the items to individuals and/or pawn shops in order to turn the stolen merchandise into cash. Cobb paid his co-conspirators a share of the money and kept the rest of the proceeds for himself. During the course of the conspiracy, Cobb and his co-conspirators used the stolen credit cards to obtain or attempt to obtain approximately \$100,000.00 in merchandise. Cobb and his co-conspirators committed multiple criminal acts in Warren County and at least eight other counties around Ohio.

**COUNT ONE**

*ENGAGING IN A PATTERN OF CORRUPT ACTIVITIES  
R.C. 2923.32*

**Defendant:** DESHAWN MITCHELL

**Offense Date:** During a period of time beginning on or about June 1, 2012, the exact date being unknown, and ending on a date not later than January 9, 2013.

**Offense Level:** First Degree Felony

**Predicate Offenses:** -- Money Laundering – R.C. 1315.55(A)(1); a felony of the third degree  
-- Misuse of Credit Cards – R.C. 2913.21(B)(2); a felony of the fourth degree

**-- Receiving Stolen Property – R.C. 2913.51; a felony of the fifth degree**

- 1) During a period of time beginning on or about June 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, in Warren County, Ohio and elsewhere in a manner invoking the jurisdiction and venue of Warren County, Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **DESHAWN MITCHELL**, being associated with an enterprise, violated Section 2923.32(A)(1) of the Ohio Revised Code in that they did, knowingly, conduct and participate directly and indirectly in conduct of such enterprise's affairs in a pattern of corrupt activity, as defined in Ohio Revised Code Section 2923.31(A), a felony of the first degree.
- 2) The enterprise, as defined in Ohio Revised Code Section 2923.31, consisted of persons both known and unknown to the grand jury, including namely, Larry D. Cobb, Deshawn Mitchell, Jodie Petty, Kristina Petty, and other persons.
- 3) The enterprise engaged in illicit enterprises out of Warren County, Ohio and elsewhere, associated in fact with a common purpose to conduct transactions knowing that property involved was the proceeds of unlawful activity for the purpose of committing and furthering corrupt activity; and to obtain property by the use of a credit card in one or more transactions, knowing that the card was obtained in violation of the law with a purpose to defraud; and did commit these acts in violation of Ohio Revised Code Sections 1315.55, 2913.21, and 2913.51, all being felonies.
- 4) **DESHAWN MITCHELL**, conducted and participated directly and indirectly in the conduct of such enterprise's affairs through a pattern of corrupt activity consisting of money laundering and misuse of credit cards and/or attempts thereof which are punishable under the laws of the State of Ohio through Ohio Revised Code Sections 1315.55, 2913.21, and 2913.51, all being felonies.
- 5) The pattern of corrupt activity referred to in Paragraphs 1-4 above committed by said offender includes, but is not limited to, two or more incidents of the following corrupt activities, whether or not there has been a prior conviction, that are related to the affairs of the same enterprise, are not isolated and are not so closely related to each other and connected in time and place that they constitute a single event by engaging in, attempting to engage in, conspiring to engage in, soliciting, coercing, or intimidating another to engage in any of the following:
  - A. **DESHAWN MITCHELL** did knowingly on two or more occasions, not isolated and not so closely related to each other and connected in time and place that they constitute a single event, during a period of time beginning on or about June 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, conduct transactions knowing that property was the proceeds of unlawful activity for the purpose of committing and furthering corrupt activity, each in

violation of Ohio Revised Code Section 1315.55(A)(1), each being a felony of the third degree.

B. **DESHAWN MITCHELL** did knowingly on two or more occasions, not isolated and not so closely related to each other and connected in time and place that they constitute a single event, during a period of time beginning on or about June 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, acting either as a principle offender or as an accomplice, obtain property by the use of a credit card in one or more transactions, knowing that the card was obtained in violation of the law with a purpose to defraud, in violation of R.C. 2913.21(B)(2); a felony of the fourth degree.

C. **DESHAWN MITCHELL** did knowingly, during a period of time beginning on or about June 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, in Warren County, Ohio, and elsewhere, through a continuing course of conduct involving two or more occasions, not isolated and not so closely related to each other and connected in time and place that they constitute a single event, receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense, each in violation of Ohio Revised Code Section 2913.51(A), being a felony of the fifth degree.

In violation of Ohio Revised Code Section 2923.32(A)(1), all against the Peace and Dignity of the State of Ohio.

**COUNT TWO**  
**CONSPIRACY**  
**R.C. 2923.01**

**Defendants:** **DESHAWN MITCHELL**

**Offense Date:** **During a period of time, the specific dates of said conduct being unknown, beginning on or about June 1, 2012 and ending on a date a date not later than January 9, 2013**

**Offense Level:** **Second Degree Felony**

- 1) During a period of time, the specific dates of said conduct being unknown, beginning on or about June 1, 2012 and ending on a date a date not later than January 9, 2013, in Warren County, Ohio and elsewhere in a manner invoking the jurisdiction and venue of Warren County, Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **DESHAWN MITCHELL**, did with purpose to commit, promote or facilitate the commission of



Engaging in a Pattern of Corrupt Activities, agree with **LARRY COBB, JODIE PETTY, KRISTINA PETTY**, and/or other persons, that one or more of them would engage in conduct which facilitates the commission of such offense, a substantial overt act in furtherance of the said conspiracy having been done by **DESHAWN MITCHELL**, or a person with whom he conspired, subsequent to his entrance into the conspiracy;

In violation of Ohio Revised Code Section 2923.01, against the Peace and Dignity of the State of Ohio.

**COUNT THREE**  
*MONEY LAUNDERING*  
*R.C. 1315.55*

**Defendant:**           **DESHAWN MITCHELL**

**Offense Date:**       **May 23, 2012**

**Offense Level:**      **Third Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about May 23, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **DESHAWN MITCHELL** did conduct a transaction knowing that property was the proceeds of unlawful activity, to wit: using the stolen credit card of Tina Trim, with the purpose of committing and furthering corrupt activity, in violation of Ohio Revised Code Section 1315.55(A)(1), being a felony of the third degree.

In violation of Ohio Revised Code Section 1315.55(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT FOUR**  
*MONEY LAUNDERING*  
*R.C. 2911.12*

**Defendant:**            **DESHAWN MITCHELL**

**Offense Date:**        **JUNE 7, 2012**

**Offense Level:**        **Third Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about June 7, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, DESHAWN MITCHELL did conduct a transaction knowing that property was the proceeds of unlawful activity, to wit: using the credit card of Amy Cisco and/or Vanessa R. Lubega, with the purpose of committing and furthering corrupt activity, in violation of Ohio Revised Code Section 1315.55(A)(1), being a felony of the third degree.

In violation of Ohio Revised Code Section 1315.55(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT FIVE**  
*MONEY LAUNDERING*  
*R.C. 2911.12*

**Defendant:**            **DESHAWN MITCHELL**

**Offense Date:**        **June 18, 2012**

**Offense Level:**        **Third Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about June 18, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, DESHAWN MITCHELL did conduct a transaction knowing that property was the proceeds of unlawful activity, to wit: using the stolen credit card of Brian Scritchfield, Michelle Zhuravlev, and/or Melissa Masters, with the purpose of committing and furthering corrupt activity, in violation of Ohio Revised Code Section 1315.55(A)(1), being a felony of the third degree.

In violation of Ohio Revised Code Section 1315.55(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT SIX**  
*MONEY LAUNDERING*  
*R.C. 2911.12*

**Defendant:**            **DESHAWN MITCHELL**

**Offense Date:**        **July 12, 2012**

**Offense Level:**       **Third Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about July 12, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **DESHAWN MITCHELL** did conduct a transaction knowing that property was the proceeds of unlawful activity, to wit: using the stolen credit card of Sandra Hall, Gregory Hart, Pam Blauch, Cindy Tran, and/or Bob Rogers, with the purpose of committing and furthering corrupt activity, in violation of Ohio Revised Code Section 1315.55(A)(1), being a felony of the third degree.

In violation of Ohio Revised Code Section 1315.55(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT SEVEN**  
*MONEY LAUNDERING*  
*R.C. 2911.12*

**Defendant:**            **DESHAWN MITCHELL**

**Offense Date:**        **July 17, 2012**

**Offense Level:**       **Third Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about July 17, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **DESHAWN MITCHELL** did conduct a transaction knowing that property was the proceeds of unlawful activity, to wit: using the stolen credit card of Kay

Morris, Kimberly Buckman, and/or Elizabeth Keith, with the purpose of committing and furthering corrupt activity, in violation of Ohio Revised Code Section 1315.55(A)(1), being a felony of the third degree.

In violation of Ohio Revised Code Section 1315.55(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT EIGHT**  
*MISUSE OF CREDIT CARDS*  
*R.C. 2913.21*

**Defendant:**            **DESHAWN MITCHELL**


**Offense Date:**        **May 23, 2012 – August 21, 2012**

**Offense Level:**        **Fifth Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about May 23, 2012 to August 21, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, DESHAWN MITCHELL did, with purpose to defraud, obtain property or services by use of a credit card, in one or more transactions, knowing or having reasonable cause to believe that the card has expired or been revoked, or was obtained, is retained, or is being used in violation of law, to wit: DESHAWN MITCHELL, during a period of ninety consecutive days commencing on the date of the first violation, obtained property worth more than one thousand dollars but less than seven thousand five hundred dollars in violation of Ohio Revised Code Section 2913.21(B)(2), being a felony of the fifth degree.

In violation of Ohio Revised Code Section 2913.21(B)(2), against the Peace and Dignity of the State of Ohio.

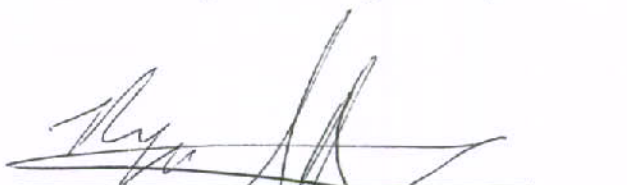
This Bill of Indictment found upon testimony sworn and sent before the Grand Jury at the Request of the Prosecuting Attorney.



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Foreperson of the Grand Jury

**DAVID P. FORNSHELL**  
Warren County Prosecuting Attorney



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**Ryan M. Stubenrauch (0083963)**  
**Marianne T. Hemmeter (0068896)**  
**Jonathan D. Blanton (0070035)**  
Special Assistant Prosecuting Attorneys  
Office of the Ohio Attorney General  
30 E. Broad Street, 14<sup>th</sup> Floor  
Telephone – 614-466-7828  
Facsimile – 866-771-4241  
[ryan.stubenrauch@ohioattorneygeneral.gov](mailto:ryan.stubenrauch@ohioattorneygeneral.gov)

COMMON PLEAS COURT

SEPTEMBER, 2013 CASE NO.

WARREN COUNTY, OHIO

THE STATE OF OHIO VS. DESHAWN MITCHELL

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FILED: October 28, 2013 James L. Spaeth CLERK

BY: \_\_\_\_\_ DEPUTY CLERK

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THE STATE OF OHIO, WARREN COUNTY.

I, the undersigned, Clerk of the Court of Common Pleas in and for said County, do hereby certify that the foregoing is a full, true and correct copy of the original indictment, with the endorsements thereon, now on file in my office.

WITNESS MY HAND AND SEAL OF SAID COURT,  
AT

Lebanon , Ohio, this

28<sup>th</sup> day of October 2013

\_\_\_\_\_  
James L. Spaeth Clerk

BY: \_\_\_\_\_ Deputy

**NOTICE TO APPEAR**

DESHAWN MITCHELL, YOU HAVE BEEN INDICTED BY THE GRAND JURY OF WARREN COUNTY, OHIO, AND YOU ARE HEREBY ORDERED TO PERSONALLY APPEAR AT 8:30 A.M. ON NOVEMBER 15, 2013 AT THE COMMON PLEAS COURT 500 JUSTICE DRIVE, LEBANON, OHIO, OR IF YOU ARE INCARCERATED, YOU WILL BE SCHEDULED FOR A VIDEO ARRAIGNMENT, AND THAT FAILURE TO APPEAR WILL RESULT IN A WARRANT FOR ARREST, FORFEITURE OF BOND, IF ANY, OR ADDITIONAL CRIMINAL CHARGES FOR FAILURE TO APPEAR UNDER REVISED CODE 2937.99.

IN THE COURT OF COMMON PLEAS  
WARREN COUNTY, OHIO  
CRIMINAL DIVISION

COMMON PLEAS COURT  
WARREN COUNTY, OHIO  
FILED

2013 OCT 28 AM 11:13

JAMES L. SPALIH  
CLERK OF COURTS

STATE OF OHIO

: Case No.

:

: Judge

:

: INDICTMENT

: Charges:

:

: [Count 1]

: Engaging in a Pattern of Corrupt Activities  
(F1) R.C. 2923.32(A)(1);

:

: [Count 2]

: Conspiracy to Engage in a Pattern of Corrupt  
Activities (F2), R.C. 2923.01(A);

:

: [Counts 3 through 6]

: Money Laundering (F3), R.C. 1315.55(A)(1);

:

: [Counts 7]

: Misuse of Credit Cards (F5), R.C.  
2913.21(B)(1);

KRISTINA M. PETTY,

Defendant.

State of Ohio )

)

Warren County )

THE JURORS OF THE GRAND JURY OF THE STATE OF OHIO, within and for the body of the County aforesaid, on their oaths, in the name and by the authority of the State of Ohio, do find and present:

**I. GENERAL ALLEGATIONS**

- 1) Beginning on or about May 1<sup>st</sup>, 2012, **LARRY D. COBB** ("Cobb"), formed an organized criminal enterprise with several other individuals. The goal of the criminal enterprise and associated conspiracy was for **LARRY COBB** to gain entry into occupied offices around Ohio during work hours and steal credit cards, cash, and other items that had been left unattended within the office building.

- 2) In order to gain entry, Cobb would dress in business casual attire with a blank identification card around his neck. Often, Cobb would carry a portfolio or briefcase with him in order to blend in with the other employees. He employed many different methods of stealth and/or deception in order to get through locked doors or security checkpoints. Typically, Cobb would try to gain entry around the lunch hour or other times when employees were likely to be away from their desk.
- 3) Once inside a building, Cobb would target the offices of employees who were away from their desk. Cobb would look for purses or wallets left in desk drawers and would take credit cards, cash, drivers' licenses, and other items. Typically, Cobb would leave the purse or wallet after removing the items in order to delay discovery of his crimes.
- 4) Once Cobb obtained the credit cards, he would usually pass them to one or more of his co-conspirators, including **KRISTINA M. PETTY**. Cobb then instructed the co-conspirators to take the stolen credit cards to retail stores in the area and purchase electronics, gift cards, and other items. Co-conspirators would quickly purchase as many expensive items as possible before the victim reported their credit cards stolen, sometimes buying thousands of dollars worth of gift cards and/or electronics before the cards were disabled or reported stolen.
- 5) After obtaining items with the stolen credit cards, Cobb and his co-conspirators would typically sell the items to individuals and/or pawn shops in order to turn the stolen merchandise into cash. Cobb paid his co-conspirators a share of the money and kept the rest of the proceeds for himself. During the course of the conspiracy, Cobb and his co-conspirators used the stolen credit cards to obtain or attempt to obtain approximately \$100,000.00 in merchandise. Cobb and his co-conspirators committed multiple criminal acts in Warren County and at least eight other counties around Ohio.

**COUNT ONE**

*ENGAGING IN A PATTERN OF CORRUPT ACTIVITIES  
R.C. 2923.32*

**Defendant:** KRISTINA M. PETTY

**Offense Date:** During a period of time beginning on or about May 1, 2012, the exact date being unknown, and ending on a date not later than January 9, 2013.

**Offense Level:** First Degree Felony

**Predicate Offenses:**  
-- Money Laundering – R.C. 1315.55(A)(1); a felony of the third degree



- Misuse of Credit Cards – R.C. 2913.21(B)(2); a felony of the fourth degree
- Receiving Stolen Property – R.C. 2913.51; a felony of the fifth degree

- 1) During a period of time beginning on or about May 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, in Warren County, Ohio and elsewhere in a manner invoking the jurisdiction and venue of Warren County, Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **KRISTINA M. PETTY**, being associated with an enterprise, violated Section 2923.32(A)(1) of the Ohio Revised Code in that they did, knowingly, conduct and participate directly and indirectly in conduct of such enterprise's affairs in a pattern of corrupt activity, as defined in Ohio Revised Code Section 2923.31(A), a felony of the first degree.
- 2) The enterprise, as defined in Ohio Revised Code Section 2923.31, consisted of persons both known and unknown to the grand jury, including namely, **LARRY D. COBB, DESHAWN MITCHELL, JODIE PETTY, KRISTINA M. PETTY**, and other persons.
- 3) The enterprise engaged in illicit enterprises out of Warren County, Ohio and elsewhere, associated in fact with a common purpose to conduct transactions knowing that property involved was the proceeds of unlawful activity for the purpose of committing and furthering corrupt activity; to obtain property by the use of a credit card in one or more transactions, knowing that the card was obtained in violation of the law with a purpose to defraud; did receive, retain, or dispose of property of another; to wit: credit cards, knowing or having reasonable cause to believe that said credit cards had been obtained through the commission of a theft offense, and did commit these acts in violation of Ohio Revised Code Sections 1315.55, 2913.21, and 2913.51, all being felonies.
- 4) **KRISTINA M. PETTY**, conducted and participated directly and indirectly in the conduct of such enterprise's affairs through a pattern of corrupt activity consisting of Money Laundering, Misuse of Credit Cards, and Receiving Stolen Property and/or attempts thereof which are punishable under the laws of the State of Ohio through Ohio Revised Code Sections 1315.55, 2913.21, and 2913.51, all being felonies.
- 5) The pattern of corrupt activity referred to in Paragraphs 1-4 above committed by said offender includes, but is not limited to, two or more incidents of the following corrupt activities, whether or not there has been a prior conviction, that are related to the affairs of the same enterprise, are not isolated and are not so closely related to each other and connected in time and place that they constitute a single event by engaging in, attempting to engage in, conspiring to engage in, soliciting, coercing, or intimidating another to engage in any of the following:
  - A. **KRISTINA M. PETTY** did knowingly on two or more occasions, not isolated and not so closely related to each other and connected in time and place that they

constitute a single event, during a period of time beginning on or about May 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, conduct transactions knowing that property was the proceeds of unlawful activity for the purpose of committing and furthering corrupt activity, each in violation of Ohio Revised Code Section 1315.55(A)(1), each being a felony of the third degree.

- B. **KRISTINA M. PETTY** did knowingly on two or more occasions, not isolated and not so closely related to each other and connected in time and place that they constitute a single event, during a period of time beginning on or about May 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, acting either as a principle offender or as an accomplice, obtain property by the use of a credit card in one or more transactions, knowing that the card was obtained in violation of the law with a purpose to defraud, in violation of R.C. 2913.21(B)(2); a felony of the fourth degree.
- C. **KRISTINA M. PETTY** did knowingly, during a period of time beginning on or about May 1, 2012 the exact date being unknown and ending on a date not later than January 9, 2013, in Warren County, Ohio, and elsewhere, through a continuing course of conduct involving two or more occasions, not isolated and not so closely related to each other and connected in time and place that they constitute a single event, receive, retain, or dispose of property of another knowing or having reasonable cause to believe that the property has been obtained through commission of a theft offense, each in violation of Ohio Revised Code Section 2913.51(A), being a felony of the fifth degree.

In violation of Ohio Revised Code Section 2923.32(A)(1), all against the Peace and Dignity of the State of Ohio.

**COUNT TWO**  
**CONSPIRACY**  
**R.C. 2923.01**

**Defendants:** KRISTINA M. PETTY

**Offense Date:** During a period of time, the specific dates of said conduct being unknown, beginning on or about May 1, 2012 and ending on a date a date not later than January 9, 2013

**Offense Level:** Second Degree Felony

- 1) During a period of time, the specific dates of said conduct being unknown, beginning on or

about May 1, 2012 and ending on a date a date not later than January 9, 2013, in Warren County, Ohio and elsewhere in a manner invoking the jurisdiction and venue of Warren County, Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **KRISTINA M. PETTY**, did with purpose to commit, promote or facilitate the commission of Engaging in a Pattern of Corrupt Activities, agree with **LARRY COBB, DESHAWN MITCHELL, JODIE PETTY**, and/or other persons, that one or more of them would engage in conduct which facilitates the commission of such offense, a substantial overt act in furtherance of the said conspiracy having been done by **KRISTINA M. PETTY**, or a person with whom she conspired, subsequent to her entrance into the conspiracy;

In violation of Ohio Revised Code Section 2923.01, against the Peace and Dignity of the State of Ohio.

**COUNT THREE**  
*MONEY LAUNDERING*  
*R.C. 2911.12*

**Defendant:**                   **KRISTINA M. PETTY**

**Offense Date:**           **June 20, 2012**

**Offense Level:**       **Third Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about June 20, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **KRISTINA M. PETTY** did conduct a transaction knowing that property was the proceeds of unlawful activity, to wit: using a stolen credit card to purchase items at Wal-Mart stores with the purpose of committing and furthering corrupt activity, in violation of Ohio Revised Code Section 1315.55(A)(1), being a felony of the third degree.

In violation of Ohio Revised Code Section 1315.55(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT FOUR**  
*MONEY LAUNDERING*  
*R.C. 2911.12*

**Defendant:** KRISTINA M. PETTY

**Offense Date:** August 24, 2012

**Offense Level:** Third Degree Felony

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about August 24, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **KRISTINA M. PETTY** did conduct a transaction knowing that property was the proceeds of unlawful activity, to wit: using the stolen credit card of Amy Fenderson, Linda Ganyard, Dana Szewczk, and/or Don Kurti with the purpose of committing and furthering corrupt activity, in violation of Ohio Revised Code Section 1315.55(A)(1), being a felony of the third degree.

In violation of Ohio Revised Code Section 1315.55(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT FIVE**  
*MONEY LAUNDERING*  
*R.C. 2911.12*

**Defendant:** KRISTINA M. PETTY

**Offense Date:** September 4, 2012

**Offense Level:** Third Degree Felony

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about September 4, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **KRISTINA M. PETTY** did conduct a transaction knowing that property was the proceeds of unlawful activity, to wit: using the stolen credit card of Tenia Crock with the purpose of committing and furthering corrupt activity, in violation of Ohio Revised Code Section 1315.55(A)(1), being a felony of the third degree.

In violation of Ohio Revised Code Section 1315.55(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT SIX**  
*MONEY LAUNDERING*  
*R.C. 2911.12*

**Defendant:**           **KRISTINA M. PETTY**

**Offense Date:**       **November 8, 2012**

**Offense Level:**      **Third Degree Felony**

- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about November 8, 2012, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **KRISTINA M. PETTY** did conduct a transaction knowing that property was the proceeds of unlawful activity, to wit: using the stolen credit card of Joann Gustafson to purchase a laptop computer and other electronics with the purpose of committing and furthering corrupt activity, in violation of Ohio Revised Code Section 1315.55(A)(1), being a felony of the third degree.

In violation of Ohio Revised Code Section 1315.55(A)(1), against the Peace and Dignity of the State of Ohio.

**COUNT SEVEN**  
*MISUSE OF CREDIT CARDS*  
*R.C. 2913.21*

**Defendant:**           **KRISTINA M. PETTY**

**Offense Date:**       **August 10, 2012 – November 8, 2012**

**Offense Level:**      **Fourth Degree Felony**


- 1) And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that between August 10, 2012, and November 8, 2012, a 90 Day time period, in Warren County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Warren, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, **KRISTINA M. PETTY** did, with purpose to defraud, obtain property or services by use of a credit card, in one or more transactions, knowing or having reasonable cause to believe that the card has expired or been revoked, or was obtained, is retained, or is being used in violation of law, to wit: **KRISTINA M. PETTY**, during a period of ninety consecutive days commencing on or

about August 10, 2012, obtained property worth more than seven thousand five hundred dollars but less than one hundred and fifty thousand dollars using stolen credit cards in violation of Ohio Revised Code Section 2913.21(B)(2), being a felony of the fifth degree.

In violation of Ohio Revised Code Section 2913.21(B)(2), against the Peace and Dignity of the State of Ohio.


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This Bill of Indictment found upon testimony sworn and sent before the Grand Jury at the Request of the Prosecuting Attorney.



Foreperson of the Grand Jury

**DAVID P. FORNSHELL**  
Warren County Prosecuting Attorney



**Ryan M. Stubenrauch (0083963)**  
**Marianne T. Hemmeter (0068896)**  
**Jonathan D. Blanton (0070035)**  
Special Assistant Prosecuting Attorneys  
Office of the Ohio Attorney General  
30 E. Broad Street, 14<sup>th</sup> Floor  
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COMMON PLEAS COURT

SEPTEMBER, 2013 CASE NO.

WARREN COUNTY, OHIO

THE STATE OF OHIO VS. KRISTINA M. PETTY

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FILED: October 28, 2013 James L. Spaeth CLERK

BY: \_\_\_\_\_ DEPUTY CLERK

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THE STATE OF OHIO, WARREN COUNTY.

I, the undersigned, Clerk of the Court of Common Pleas in and for said County, do hereby certify that the foregoing is a full, true and correct copy of the original indictment, with the endorsements thereon, now on file in my office.

WITNESS MY HAND AND SEAL OF SAID COURT,  
AT

Lebanon, Ohio, this

28<sup>th</sup> day of October 2013

\_\_\_\_\_  
James L. Spaeth Clerk

BY: \_\_\_\_\_ Deputy

**NOTICE TO APPEAR**

KRISTINA M. PETTY, YOU HAVE BEEN INDICTED BY THE GRAND JURY OF WARREN COUNTY, OHIO, AND YOU ARE HEREBY ORDERED TO PERSONALLY APPEAR AT 8:30 A.M. ON NOVEMBER 15, 2013 AT THE COMMON PLEAS COURT 500 JUSTICE DRIVE, LEBANON, OHIO, OR IF YOU ARE INCARCERATED, YOU WILL BE SCHEDULED FOR A VIDEO ARRAIGNMENT, AND THAT FAILURE TO APPEAR WILL RESULT IN A WARRANT FOR ARREST, FORFEITURE OF BOND, IF ANY, OR ADDITIONAL CRIMINAL CHARGES FOR FAILURE TO APPEAR UNDER REVISED CODE 2937.99.