

FILED
LUCAS COUNTY

2023 AUG 22 PM 12: 37

COMMON PLEAS COURT
BERNIE QUILTER
CLERK OF COURTS

IN THE COURT OF COMMON PLEAS, LUCAS COUNTY, OHIO

STATE OF OHIO)	Case No: CR 202302291-000
Plaintiff)	
v.)	NOTICE OF FILING INDICTMENT
)	
CHAD T GATTER et al)	Louis Kountouris, #0023692
Defendants)	Assistant Prosecuting Attorney

Indictment for the above captioned case has been filed with the Lucas County Clerk of Courts. Notice of filing herein contains an abbreviated summary of the indictment for the purpose of clerical intake with the Lucas County Clerk of Courts and neither replaces nor supplements the charges listed in the attached indictment.

D-1 **CHAD T GATTER**

ORIG TRUE BILL-NO BOOK/WARRANT

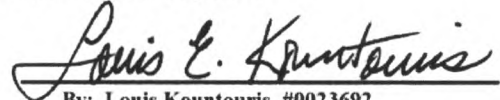
ct 1	3734.83A&.99F	ILLEGAL TRANSPORTATION OF SCRAP TIRES	FSP
ct 2	3734.03&.99A	OPEN DUMPING OF SCRAP TIRES	FSP

D-2 **AMANDA N WAGNER**

ORIG TRUE BILL-NO BOOK/SUMMONS

ct 3	2923.03A2&3734.83A&.	COMP IN COMM OF ILL TRANS OF SCRAP TIRES	FSP
ct 4	3734.03&.99A	OPEN DUMPING OF SCRAP TIRES	FSP

JULIA R. BATES, PROSECUTING ATTORNEY
LUCAS COUNTY, OHIO



By: Louis Kountouris, #0023692
Assistant Prosecuting Attorney

THE STATE OF OHIO, LUCAS COUNTY, ss.

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

WITNESS my hand and seal of said Court at
Toledo, Ohio, this ____ day of ____, 2023.
J. BERNIE QUILTER, Clerk.

By: _____ Deputy

INDICTMENT



THE STATE OF OHIO,
Lucas County, } ss.

Of the May, Term of 2023, A.D.

FIRST COUNT- AS TO CHAD T. GATTER

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **CHAD T. GATTER**, as a course of conduct beginning on or between the 22ND day of JUNE, 2022 and continuing through the 31ST day of AUGUST, 2022, in Lucas County, Ohio, did, knowingly transport more than ten (10) scrap tires in a single load somewhere in this state without first registering with and obtaining a registration certificate from the director of environmental protection, in violation of **§3734.83(A) and §3734.99(F) OF THE OHIO REVISED CODE, ILLEGAL TRANSPORTATION OF SCRAP TIRES, BEING AN UNCLASSIFIED FELONY**, contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

SECOND COUNT-AS TO CHAD T. GATTER

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **CHAD T. GATTER**, as a course of conduct beginning on or between the 22ND day of JUNE, 2022 and continuing through the 31ST day of AUGUST, 2022, in Lucas County, Ohio, did, recklessly dispose of solid waste by open dumping and the offense involved scrap tires, in violation of **§3734.03 and §3734.99(A) OF THE OHIO REVISED CODE, OPEN DUMPING OF**

SCRAP TIRES, BEING AN UNCLASSIFIED FELONY, contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

THIRD COUNT-AS TO AMANDA N. WAGNER

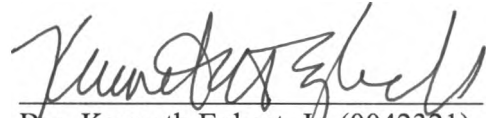
THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **AMANDA N. WAGNER**, as a course of conduct beginning on or between the 22ND day of JUNE, 2022 and continuing through the 31ST day of AUGUST, 2022, in Lucas County, Ohio, did, act with the kind of culpability required for the commission of an offense, and did aid or abet another in committing the offense of illegal transportation of scrap tires, an unclassified felony, namely, at multiple tire store generators, assist Chad T. Gatter in the loading and placement of scrap tires in vehicles wherein the said Chad T. Gatter did, knowingly transport more than ten (10) scrap tires in a single load somewhere in this state without first registering with and obtaining a registration certificate from the director of environmental protection in violation, of **§2923.03(A)(2) and §3734.83(A) and §3734.99(F) OF THE OHIO REVISED CODE, COMPLICITY IN THE COMMISSION OF ILLEGAL TRANSPORTATION OF SCRAP TIRES, BEING AN UNCLASSIFIED FELONY**, contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FOURTH COUNT-AS TO AMANDA N. WAGNER

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for Lucas County, Ohio, on their oaths, in the name and by the authority of the State of Ohio, do find and present that **AMANDA N. WAGNER**, as a course of conduct beginning on or between the 22ND day of JUNE, 2022 and continuing through the 31ST day of AUGUST, 2022, in Lucas County, Ohio, did, recklessly dispose of solid waste by open dumping and the offense involved scrap tires, in

violation of §3734.03 and §3734.99(A) OF THE OHIO REVISED CODE, OPEN DUMPING
OF SCRAP TIRES, BEING AN UNCLASSIFIED FELONY, contrary to the form of the statute
in such case made and provided, and against the peace and dignity of the State of Ohio.

Dave Yost
Ohio Attorney General
Lucas County, Ohio



By: Kenneth Egbert, Jr. (0042321)
Amy Geocaris (0099309)
Assistant Ohio Attorneys General
Environmental Enforcement Section
Ohio Attorney General's Office

A TRUE BILL.



FOREPERSON OF THE GRAND JURY