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2014 FEB 27 PM 1:11

TERRI A. MAZUR, CLERK
COMMON PLEAS COURT
GREENE COUNTY, OHIO

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

2014CR0092

STATE OF OHIO

: Case No.

:

: Judge

v.

:

: INDICTMENT

: Charges:

ANTONE JACKSON,

:

: [Counts 1, 2]

Defendant.

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

:

: [Count 3]

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

:

: [Counts 4, 6, 7, 9, 11, 12, 13, 15, 17, 19, 21,
23, 25, 27, 28] - Breaking and Entering (F5),
R.C. 2911.13(A) or (B)

:

: [Counts 8, 14, 16, 18, 24, 26, 29]

: Theft (F5), R.C. 2913.02(A)(1)

:

: [Counts 5, 10, 20, 22]

: Grand Theft (F4), R.C. 2913.02(A)(1)

:

: [Count 30]

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

State of Ohio)

)

Greene 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 December 1, 2013, Antone Jackson (“Jackson”) joined an organized criminal enterprise and conspiracy with several other individuals. The goal of the criminal enterprise and associated conspiracy was for Antone Jackson and his co-conspirators to gain entry into retail wireless stores around Ohio and other states and steal cellphones, tablet computers, other merchandise and/or currency from within the store.
- 2) In order to gain entry, Jackson and his co-conspirators would travel to a cellphone store in a group of two or more people after the store had closed. Typically, most of the incidents took place in the early morning hours. Once they arrived at the store, one of the conspirators would typically use a heavy rock or piece of concrete to smash the glass of the front door. Once the glass was broken, the conspirators would quickly run into the store and steal the phones and other items in a methodical and preplanned manner. Often, the conspirators would be in and out of the building in less than two minutes. Typically, one of the co-conspirators would wait in the car in order to keep a lookout or enable a quick getaway.
- 3) The organized criminal enterprise and conspiracy targeted wireless stores in Greene County and many other counties in Ohio and other states. Most commonly, the enterprise targeted Verizon Wireless stores and/or retailers due to their higher street value. However, the Enterprise also targeted wireless stores and/or retailers such as AT&T, or T-Mobile. Occasionally, the group would target more than one wireless store in an evening, sometimes hitting as many as six stores in one evening. During those incidents, the suspects travelled along a pre-planned route. Sometimes, a suspect would obtain a rental car through an intermediary to transport the suspects around the state to commit the crimes. Other times, a suspect would recruit another person with a vehicle to drive the suspects around on a given night.
- 4) Once the conspirators obtained merchandise from the stores they would attempt to quickly sell the stolen goods to persons and/or co-conspirators who were known to buy stolen cellphones and/or other electronics. Members of the criminal enterprise and conspiracy typically referred to these persons or places that purchased the stolen goods as “plugs.” The suspects preferred newer high-end phones such as Apple iPhones and Samsung Galaxy devices but would often steal other brands of phones, tablets, and/or accessories if they were available.
- 5) Once the conspirators had sold the stolen merchandise, they split the proceeds up among themselves. The suspects used the proceeds to purchase things like designer clothing, hotel rooms rental vehicles, and many other items to support their lifestyle and further the criminal enterprise.

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

Defendant: ANTONE JACKSON

Offense Date: During a period of time beginning on or about December 1, 2013, the exact date being unknown, and ending on a date not later than February 13, 2014.

Offense Level: First Degree Felony

Incidents of Corrupt Activity:

- **Breaking and Entering** – R.C. 2911.13; a felony of the fifth degree; Including the conduct specified in Counts 4, 6, 7, 9, 11, 12, 13, 15, 17, 19, 21, 23, 25, 27, and 28 of this Indictment as well as additional incidents discussed in Paragraph 5-6 of Count One.
- **Theft** – R.C. 2913.02(A)(1); a felony of the fifth degree; Including the conduct specified in Counts 8, 14, 16, 18, 24, 26, and 29 of this Indictment as well as additional incidents discussed in Paragraph 5-6 of Count One.
- **Grand Theft** – R.C. 2913.02(A)(1); a felony of the fourth degree; Including the conduct specified in Counts 5, 10, 20, and 22 of this Indictment as well as additional acts discussed in Paragraph 5-6 of Count One.
- **Money Laundering** – R.C. 1315.55(A)(1); a felony of the third degree; Including the conduct specified in Count 30 of this Indictment as well the additional incidents discussed in Paragraph 5-6 of Count One.

- 1) During a period of time beginning on or about December 1, 2013 the exact date being unknown and ending on a date not later than February 13, 2014, in Greene County, Ohio and elsewhere in a manner invoking the jurisdiction and venue of Greene County, Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson, being associated with an enterprise, violated Section 2923.32(A)(1) of the Ohio Revised Code in that he 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, Antone Jackson, [REDACTED] Kevin Snowden, Michael Roberson, Duane Taylor, M.H. a juvenile, and additional persons who are both known and unknown to the Grand Jury.

- 3) The enterprise engaged in illicit enterprises out of Greene County, Ohio and elsewhere, associated in fact with a common purpose to, by force, stealth, or deception, trespass in unoccupied structures with purpose to commit therein a theft offense or other felony; to conduct transactions knowing that property involved was the proceeds of unlawful activity for the purpose of committing and furthering corrupt activity; 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 2911.13, 1315.55, and 2913.02, all being felonies.
- 4) Antone Jackson conducted and participated directly and indirectly in the conduct of such enterprise's affairs through a pattern of corrupt activity consisting of breaking and entering, money laundering, and theft and/or attempts thereof which are punishable under the laws of the State of Ohio through Ohio Revised Code Sections 2911.13, 1315.55, 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. **ANTONE JACKSON** did knowingly, during a period of time beginning on or about December 1, 2013 the exact date being unknown and ending on a date not later than February 13, 2014, in Greene 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 unoccupied structure with purpose to commit therein any theft offense or any felony offense, in violation of Ohio Revised Code Section 2911.13, each being a felony of the fifth degree.
 - B. **ANTONE JACKSON** 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 December 1, 2013 the exact date being unknown and ending on a date not later than February 13, 2014, 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);(3), being a felony of the third degree.

- C. **ANTONE JACKSON** did knowingly, during a period of time beginning on or about December 1, 2013 the exact date being unknown and ending on a date not later than February 13, 2014, in Greene 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 electronics, cash, and other merchandise, of another with purpose to deprive the owners thereof without their consent, each in violation of Ohio Revised Code Section 2913.02(A)(1), each being a felony of the fourth and/or fifth degree.
- 6) In addition to the incidents of corrupt activity discussed above and contained in Counts 4 through 30, the following additional incidents of corrupt activity are related to the enterprise:
- A. The Defendant and/or his co-conspirators broke into a wireless store in Montville, Ohio on 12/31/2013 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
 - B. The Defendant and/or his co-conspirators broke into a wireless store in Indianapolis, Indiana on 1/2/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
 - C. The Defendant and/or his co-conspirators broke into a wireless store in Chillicothe, Ohio on 1/7/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
 - D. The Defendant and/or his co-conspirators broke into a wireless store in Jackson, Ohio on 1/7/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
 - E. The Defendant and/or his co-conspirators broke into a wireless store in Athens, Ohio on 1/8/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
 - F. The Defendant and/or his co-conspirators broke into a wireless store in Westchester, Ohio on 1/9/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).

- G. The Defendant and/or his co-conspirators broke into a wireless store in Miamisburg, Ohio on 1/9/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
 - H. The Defendant and/or his co-conspirators broke into a wireless store in Beavercreek, Ohio on 1/18/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
 - I. The Defendant and/or his co-conspirators broke into a wireless store in Miamisburg, Ohio on 1/24/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
 - J. The Defendant and/or his co-conspirators broke into a wireless store in Beavercreek, Ohio on 1/25/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
 - K. The Defendant and/or his co-conspirators broke into a wireless store in Chillicothe, Ohio on 1/28/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
 - L. The Defendant and/or his co-conspirators broke into a wireless store in Chillicothe, Ohio on 1/31/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
- 7) The Grand Jurors, on their oaths aforesaid, do further present and find that at least one of the incidents of corrupt activity is a felony of the first, second, or third degree. The Grand Jurors also find that the value of the property illegally possessed in the combination of violations exceeds one thousand dollars.

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

COUNT TWO
ENGAGING IN A PATTERN OF CORRUPT ACTIVITY
R.C. 2923.32

Defendant: **ANTONE JACKSON**

Offense Date: **During a period of time beginning on or about December 1, 2013, the exact date being unknown, and ending on a date not later than February 13, 2014.**

Offense Level: **First Degree Felony**

On or about December 1, 2013 and continuing through February 13, 2014, in Greene County, State of Ohio aforesaid or venue being properly placed there pursuant to 2901.12(H), **ANTONE JACKSON**, while employed by or associated with any enterprise, unlawfully did conduct or participate in, directly or indirectly, the affairs of the enterprise, through a pattern of corrupt activity, in violation of §2923.32(A)(1) and (B)(1) of the Ohio Revised Code, being a felony of the first degree. The enterprise being a group of individuals and/or businesses, illicit and/or licit, known and/or yet unidentified, associated in fact although not a legal entity, including but not limited to, [REDACTED], Kevin Snowden, Michael Roberson, Duane Taylor, and M.H. a juvenile. These individuals would steal retail property as defined in ORC 2923.31(R) or otherwise aid and abet the enterprise to steal retail property from cell phone store retailers. The enterprise would possess the retail property with the intent to sell, deliver, or transfer the retail property to a retail property fence as defined in ORC 2923.31(S).

The corrupt activity, as defined in §2923.31(I)(5)(a)(i) of the Ohio Revised Code, being engaging in, attempting to engage in, conspiring to engage in, or soliciting, coercing, or intimidating another person to engage in conduct constituting organized retail theft, as defined in 2923.31(Q), breaking and entering, and money laundering. The value of the retail property stolen being more than \$1000, as determined in 2923.31(T). The grand jury further finds that at least one of the incidents of corrupt activity is a felony of the third degree. The incidents of corrupt activity include but are not limited to the criminal violations alleged in Counts 4 through 30 of this indictment, all of which are incorporated as if fully restated herein, as well as the following related criminal acts:

- A. The Defendant and/or his co-conspirators broke into a wireless store in Montville, Ohio on 12/31/2013 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
- B. The Defendant and/or his co-conspirators broke into a wireless store in Indianapolis, Indiana on 1/2/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).

- C. The Defendant and/or his co-conspirators broke into a wireless store in Chillicothe, Ohio on 1/7/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
- D. The Defendant and/or his co-conspirators broke into a wireless store in Jackson, Ohio on 1/7/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
- E. The Defendant and/or his co-conspirators broke into a wireless store in Athens, Ohio on 1/8/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
- F. The Defendant and/or his co-conspirators broke into a wireless store in Westchester, Ohio on 1/9/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
- G. The Defendant and/or his co-conspirators broke into a wireless store in Miamisburg, Ohio on 1/9/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
- H. The Defendant and/or his co-conspirators broke into a wireless store in Beavercreek, Ohio on 1/18/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
- I. The Defendant and/or his co-conspirators broke into a wireless store in Miamisburg, Ohio on 1/24/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
- J. The Defendant and/or his co-conspirators broke into a wireless store in Beavercreek, Ohio on 1/25/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).

- K. The Defendant and/or his co-conspirators broke into a wireless store in Chillicothe, Ohio on 1/28/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).
- L. The Defendant and/or his co-conspirators broke into a wireless store in Chillicothe, Ohio on 1/31/2014 and stole or attempted to steal merchandise and/or currency. Such action constitutes breaking and entering in violation of Revised Code 2911.13(A) or (B) and/or theft in violation of Revised Code 2913.02(A)(1).

COUNT THREE
CONSPIRACY
R.C. 2923.01

Defendants: **ANTONE JACKSON**

Offense Date: **During a period of time, the specific dates of said conduct being unknown, beginning on or about December 1, 2013 and ending on a date a date not later than February 13, 2014**

Offense Level: **Second Degree Felony**

1. During a period of time, the specific dates of said conduct being unknown, beginning on or about December 1, 2013 and ending on a date a date not later than February 13, 2014, in Greene County, Ohio and elsewhere in a manner invoking the jurisdiction and venue of Greene County, Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson, did with purpose to commit, promote or facilitate the commission of Engaging in a Pattern of Corrupt Activities, agree with Duane Taylor, [REDACTED], Kevin Snowden, Michael Roberson, M.H. a juvenile, and additional persons who are both known and unknown to the Grand Jury 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 Antone Jackson, 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 FOUR
BREAKING AND ENTERING
R.C. 2911.13

Defendant: **ANTONE JACKSON**

Offense Date: **December 27, 2013**

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 December 27, 2013, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit: 2011 Tiffin Avenue Findlay, Ohio, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT FIVE
GRAND THEFT
R.C. 2913.02

Defendant: **ANTONE JACKSON**

Offense Date: **December 27, 2013**

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 December 27, 2013, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did with purpose to deprive the owner of the store located at the address described in the previous count, knowingly obtain or exert control over either property or services, namely \$7,500 or more but less than \$150,000 of merchandise and/or currency, of another without the consent of the owner or a person authorized to give consent.

In violation of Ohio Revised Code Section 2913.02(A)(1), against the Peace and Dignity of the State of Ohio.

COUNT SIX
BREAKING AND ENTERING
R.C. 2911.13

Defendant: ANTONE JACKSON

Offense Date: December 27, 2013

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 December 27, 2013, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit 130 Levis Commons Perrysburg, Ohio, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT SEVEN
BREAKING AND ENTERING
R.C. 2911.13

Defendant: ANTONE JACKSON

Offense Date: December 29, 2013

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 December 29, 2013, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit: 1200 South Shannon Street Van Wert, Ohio, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT EIGHT

THEFT

R.C. 2913.02

Defendant: **ANTONE JACKSON**

Offense Date: **December 29, 2013**

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 December 29, 2013, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did, with purpose to deprive the owner of the store located at the address described in the previous count, knowingly obtain or exert control over either property or services, namely \$1,000 or more but less than \$7,500 of merchandise and/or currency, of another without the consent of the owner or a person authorized to give consent.

In violation of Ohio Revised Code Section 2913.02(A)(1), against the Peace and Dignity of the State of Ohio.

COUNT NINE

BREAKING AND ENTERING

R.C. 2911.13

Defendant: **ANTONE JACKSON**

Offense Date: **December 29, 2013**

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 December 29, 2013, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit: 310 Perry Street Wapakoneta, Ohio, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT TEN
GRAND THEFT
R.C. 2913.02

Defendant: **ANTONE JACKSON**

Offense Date: **December 29, 2013**

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 December 29, 2013, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did with purpose to deprive the owner of the store located at the address described in the previous count, knowingly obtain or exert control over either property or services, namely \$7,500 or more but less than \$150,000 of merchandise and/or currency, of another without the consent of the owner or a person authorized to give consent.

In violation of Ohio Revised Code Section 2913.02(A)(1), against the Peace and Dignity of the State of Ohio.

COUNT ELEVEN
BREAKING AND ENTERING
R.C. 2911.13

Defendant: **ANTONE JACKSON**

Offense Date: **December 29, 2013**

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 December 29, 2013, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit: 2262 Michigan Street Sidney, Ohio, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT TWELVE
BREAKING AND ENTERING
R.C. 2911.13

Defendant: **ANTONE JACKSON**

Offense Date: **December 29, 2013**

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 December 29, 2013, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit: 775 West Market Street Troy, Ohio, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT THIRTEEN
BREAKING AND ENTERING
R.C. 2911.13

Defendant: **ANTONE JACKSON**

Offense Date: **December 29, 2013**

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 December 29, 2013, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit: 1701 Industrial Drive Celina, Ohio, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT FOURTEEN

THEFT

R.C. 2913.02

Defendant: **ANTONE JACKSON**

Offense Date: **December 29, 2013**

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 December 29, 2013, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did with purpose to deprive the owner of the store located at the address described in the previous count, knowingly obtain or exert control over either property or services, namely \$1,000 or more but less than \$7,500 of merchandise and/or currency, of another without the consent of the owner or a person authorized to give consent.

In violation of Ohio Revised Code Section 2913.02(A)(1), against the Peace and Dignity of the State of Ohio.

COUNT FIFTEEN

BREAKING AND ENTERING

R.C. 2911.13

Defendant: **ANTONE JACKSON**

Offense Date: **December 31, 2013**

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 December 31, 2013, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit: 2736 Medina Road Medina, Ohio, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT SIXTEEN

THEFT

R.C. 2913.02

Defendant: ANTONE JACKSON

Offense Date: December 31, 2013

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 December 31, 2013, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did, with purpose to deprive the owner of the store located at the address described in the previous count, knowingly obtain or exert control over either property or services, namely \$1,000 or more but less than \$7,500 of merchandise and/or currency, of another without the consent of the owner or a person authorized to give consent.

In violation of Ohio Revised Code Section 2913.02(A)(1), against the Peace and Dignity of the State of Ohio.

COUNT SEVENTEEN

BREAKING AND ENTERING

R.C. 2911.13

Defendant: ANTONE JACKSON

Offense Date: January 5, 2014

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 January 5, 2014, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit: 1253 North Bridge Street Chillicothe, Ohio, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT EIGHTEEN

THEFT

R.C. 2913.02

Defendant: **ANTONE JACKSON**

Offense Date: **January 5, 2014**

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 January 5, 2014, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did with purpose to deprive the owner of the store located at the address described in the previous count, knowingly obtain or exert control over either property or services, namely \$1,000 or more but less than \$7,500 of merchandise and/or currency, of another without the consent of the owner or a person authorized to give consent.

In violation of Ohio Revised Code Section 2913.02(A)(1), against the Peace and Dignity of the State of Ohio.

COUNT NINETEEN

BREAKING AND ENTERING

R.C. 2911.13

Defendant: **ANTONE JACKSON**

Offense Date: **January 5, 2014**

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 January 5, 2014, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit: 2736 Scioto Trail Portsmouth, Ohio, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT TWENTY
GRAND THEFT
R.C. 2913.02

Defendant: **ANTONE JACKSON**

Offense Date: **January 5, 2014**

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 January 5, 2014, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did with purpose to deprive the owner of the store located at the address described in the previous count, knowingly obtain or exert control over either property or services, namely \$7,500 or more but less than \$150,000 of merchandise and/or currency, of another without the consent of the owner or a person authorized to give consent.

In violation of Ohio Revised Code Section 2913.02(A)(1), against the Peace and Dignity of the State of Ohio.

COUNT TWENTY-ONE
BREAKING AND ENTERING
R.C. 2911.13

Defendant: **ANTONE JACKSON**

Offense Date: **January 7, 2014**

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 January 7, 2014, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit: 1428 Circleville Plaza Drive Circleville, Ohio, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT TWENTY-TWO

GRAND THEFT

R.C. 2913.02

Defendant: ANTONE JACKSON

Offense Date: January 7, 2014

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 January 7, 2014, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did with purpose to deprive the owner of the store located at the address described in the previous count, knowingly obtain or exert control over either property or services, namely \$7,500 or more but less than \$150,000 of merchandise and/or currency, of another without the consent of the owner or a person authorized to give consent.

In violation of Ohio Revised Code Section 2913.02(A)(1), against the Peace and Dignity of the State of Ohio.

COUNT TWENTY-THREE

BREAKING AND ENTERING

R.C. 2911.13

Defendant: ANTONE JACKSON

Offense Date: January 13, 2014

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 January 13, 2014, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit: 209 North Hurstbourne Parkway Louisville, Kentucky, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT TWENTY-FOUR

THEFT

R.C. 2913.02

Defendant: **ANTONE JACKSON**

Offense Date: **January 13, 2014**

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 January 13, 2014, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did, with purpose to deprive the owner of the store located at the address described in the previous count, knowingly obtain or exert control over either property or services, namely \$1,000 or more but less than \$7,500 of merchandise and/or currency, of another without the consent of the owner or a person authorized to give consent.

In violation of Ohio Revised Code Section 2913.02(A)(1), against the Peace and Dignity of the State of Ohio.

COUNT TWENTY-FIVE

BREAKING AND ENTERING

R.C. 2911.13

Defendant: **ANTONE JACKSON**

Offense Date: **January 27, 2014**

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 January 27, 2014, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit: 2260 North Fairfield Road Beavercreek, Ohio, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT TWENTY-SIX

THEFT

R.C. 2913.02

Defendant: **ANTONE JACKSON**

Offense Date: **January 27, 2014**

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 January 27, 2014, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did, with purpose to deprive the owner of the store located at the address described in the previous count, knowingly obtain or exert control over either property or services, namely \$1,000 or more but less than \$7,500 of merchandise and/or currency, of another without the consent of the owner or a person authorized to give consent.

In violation of Ohio Revised Code Section 2913.02(A)(1), against the Peace and Dignity of the State of Ohio.

COUNT TWENTY-SEVEN

BREAKING AND ENTERING

R.C. 2911.13

Defendant: **ANTONE JACKSON**

Offense Date: **January 31, 2014**

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 January 31, 2014, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit: 9430 Colerain Avenue Cincinnati, Ohio, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT TWENTY-EIGHT
BREAKING AND ENTERING
R.C. 2911.13

Defendant: **ANTONE JACKSON**

Offense Date: **January 31, 2014**

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 January 31, 2014, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did by force, stealth, or deception trespass in an unoccupied structure, to wit: 1147 Brown Street Dayton, Ohio, with purpose to commit a theft offense as defined in 2913.01 or any felony, in violation of Ohio Revised Code 2911.13(A) or (B), a felony of the fifth degree.

In violation of Ohio Revised Code Section 2911.13(A) or (B), against the Peace and Dignity of the State of Ohio.

COUNT TWENTY-NINE
THEFT
R.C. 2913.02

Defendant: **ANTONE JACKSON**

Offense Date: **January 31, 2014**

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 January 31, 2014, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did, with purpose to deprive the owner of the store located at the address described in the previous count, knowingly obtain or exert control over either property or services, namely \$1,000 or more but less than \$7,500 of merchandise and/or currency, of another without the consent of the owner or a person authorized to give consent.

In violation of Ohio Revised Code Section 2913.02(A)(1), against the Peace and Dignity of the State of Ohio.

COUNT THIRTY
MONEY LAUNDERING
R.C. 1315.55

Defendant: **ANTONE JACKSON**

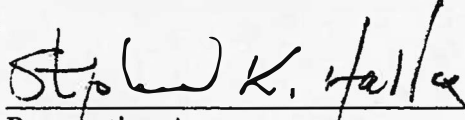
Offense Date: **During a period of time beginning on or about December 1, 2013, the exact date being unknown, and ending on a date not later than February 13, 2014.**

Offense Level: **Third Degree Felony**


- 1) During a period of time beginning on or about December 1, 2013 the exact date being unknown and ending on a date not later than February 13, 2014, in Greene 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 Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Antone Jackson did conduct a transaction or transactions knowing that property was the proceeds of unlawful activity 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);(3), 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.

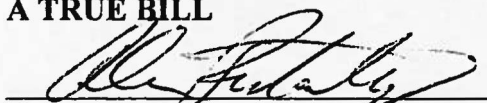


Prosecuting Attorney



Ryan M. Stubenrauch (0083963)
Special Assistant Prosecuting Attorney
Office of the Ohio Attorney General
30 E. Broad Street, 14th Floor
Telephone – 614-466-7828
Facsimile – 866-771-4241
ryan.stubenrauch@ohioattorneygeneral.gov

A TRUE BILL



Grand Jury Foreman/Forelady

The State of Ohio, Greene 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 Xenia, Ohio, this 27th day of
February, 2014.

**Terri A. Mazur, Clerk
Court of Common Pleas
Greene County, Ohio**

By: Gail Richards
(Deputy Clerk)

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

[Signature]
Grand Jury Foreman/Forelady