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

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

STATE OF OHIO

v.

KEVIN SNOWDEN,

Defendant.

: Case No. 2014CR0096
:
: Judge
:
: INDICTMENT
: Charges:
:
: [Counts 1, 2]
: Engaging in a Pattern of Corrupt Activity(F2)
: R.C. 2923.32(A)(1);
:
: [Count 3]
: Conspiracy to Engage in a Pattern of Corrupt
: Activities (F3), R.C. 2923.01(A);
:
: [Counts 4, 6, 8, 10] - Breaking and Entering
: (F5), R.C. 2911.13(A) or (B)
:
: [Counts 5, 7, 9]
: Grand Theft (F4), R.C. 2913.02(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, Kevin Snowden joined an organized criminal enterprise and conspiracy with several other individuals. The goal of the criminal enterprise and associated conspiracy was for Kevin Snowden 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: KEVIN SNOWDEN

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: Second 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, 8, and 10 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, 7, and 9 of this Indictment as well as additional acts 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, Kevin Snowden, 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 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, Antone Jackson, ██████████ ██████████ 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 and 2913.02, all being felonies.

- 4) Kevin Snowden 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 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. **KEVIN SNOWDEN** 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. **KEVIN SNOWDEN** 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), being a felony of the fourth degree.
- 6) In addition to the incidents of corrupt activity discussed above and contained in Counts 4 through 10, 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 Hancock County, Ohio on 12/27/2013 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 Perrysburg, Ohio, on 12/27/2013 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).

- C. The Defendant and/or his co-conspirators broke into a wireless store in Van Wert, Ohio, on 12/29/2013 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).
- D. The Defendant and/or his co-conspirators broke into a wireless store in Celina, Ohio, on 12/29/2013 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).
- E. The Defendant and/or his co-conspirators broke into a wireless store in Wapakoneta, Ohio, on 12/29/2013 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).
- F. The Defendant and/or his co-conspirators broke into a wireless store in Sidney, Ohio, on 12/29/2013 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).
- G. The Defendant and/or his co-conspirators broke into a wireless store in Troy, Ohio, on 12/29/2013 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).
- H. 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).
- I. 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).
- J. 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).
- K. 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).

- L. 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).
- M. 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).
- N. The Defendant and/or his co-conspirators broke into a wireless store in Louisville, Kentucky on 1/13/2014 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).
- O. 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).
- P. 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).
- Q. 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).
- R. The Defendant and/or his co-conspirators broke into a wireless store in Beavercreek, Ohio on 1/27/2014 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).
- S. 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).

- T. The Defendant and/or his co-conspirators broke into a wireless store in Dayton, 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).
- U. The Defendant and/or his co-conspirators broke into a wireless store in Miamisburg, 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).
- V. The Defendant and/or his co-conspirators broke into a wireless store in Colerain, 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 fourth or fifth 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: KEVIN SNOWDEN

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: Second Degree Felony

On or about December 1, 2013 and continuing through February 13, 2014, in Green County, State of Ohio aforesaid or venue being properly placed there pursuant to 2901.12(H), KEVIN SNOWDEN, 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, Kevin Snowden, [REDACTED], Antone Jackson, 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) and breaking and entering. The value of the retail property stolen being more than \$1000, as determined in 2923.31(T). The incidents of corrupt activity include but are not limited to the criminal violations alleged in Counts Four through Ten 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 Hancock County, Ohio on 12/27/2013 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 Perrysburg, Ohio, on 12/27/2013 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).
- C. The Defendant and/or his co-conspirators broke into a wireless store in Van Wert, Ohio, on 12/29/2013 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).
- D. The Defendant and/or his co-conspirators broke into a wireless store in Celina, Ohio, on 12/29/2013 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).
- E. The Defendant and/or his co-conspirators broke into a wireless store in Wapakoneta, Ohio, on 12/29/2013 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).
- F. The Defendant and/or his co-conspirators broke into a wireless store in Sidney, Ohio, on 12/29/2013 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).

- G. The Defendant and/or his co-conspirators broke into a wireless store in Troy, Ohio, on 12/29/2013 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).
- H. 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).
- I. 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).
- J. 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).
- K. 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).
- L. 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).
- M. 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).
- N. The Defendant and/or his co-conspirators broke into a wireless store in Louisville, Kentucky on 1/13/2014 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).
- O. 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).

- P. 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).
- Q. 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).
- R. The Defendant and/or his co-conspirators broke into a wireless store in Beavercreek, Ohio on 1/27/2014 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).
- S. 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).
- T. The Defendant and/or his co-conspirators broke into a wireless store in Dayton, 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).
- U. The Defendant and/or his co-conspirators broke into a wireless store in Miamisburg, 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).
- V. The Defendant and/or his co-conspirators broke into a wireless store in Colerain, 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: **KEVIN SNOWDEN**

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: **Third 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, Kevin Snowden, did with purpose to commit, promote or facilitate the commission of Engaging in a Pattern of Corrupt Activities, agree with Duane Taylor, Antone Jackson, [REDACTED], 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 Kevin Snowden, 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: **Kevin Snowden**

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, Kevin Snowden 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 FIVE
GRAND THEFT
R.C. 2913.02

Defendant: KEVIN SNOWDEN

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, Kevin Snowden did with purpose to deprive the owner of the store 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: KEVIN SNOWDEN

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, Kevin Snowden 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 SEVEN
GRAND THEFT
R.C. 2913.02

Defendant: KEVIN SNOWDEN
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, Kevin Snowden did with purpose to deprive the owner of the store 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 EIGHT
BREAKING AND ENTERING
R.C. 2911.13

Defendant: KEVIN SNOWDEN
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, Kevin Snowden 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 NINE
GRAND THEFT
R.C. 2913.02

Defendant: **KEVIN SNOWDEN**

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, Kevin Snowden did with purpose to deprive the owner of the store 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 TEN
BREAKING AND ENTERING
R.C. 2911.13

Defendant: **KEVIN SNOWDEN**

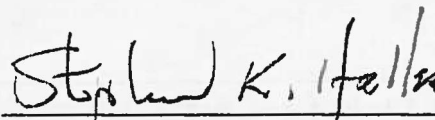
Offense Date: **January 28, 2014**

Offense Level: **Fifth Degree Felony**

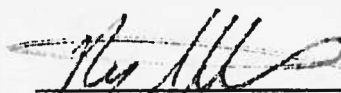
1. And the Jurors of the Grand Jury aforesaid, on their oaths aforesaid, do further present and find, that on or about January 28, 2014, in Greene County, Ohio or elsewhere by some manner enumerated in Section 2901.12 of the Ohio Revised Code whereby proper venue is placed in the County of Greene, in the State of Ohio, in accordance with Revised Code Sections 2901.11 and 2901.12, Kevin Snowden did by force, stealth, or deception trespass in an unoccupied structure, to wit: 1290 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.

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: Gare 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