

**Cuyahoga County Court of Common Pleas
Criminal Court Division**

State of Ohio, Plaintiff vs. Robert M. Arias, Defendant	A True Bill Indictment For Pandering Sexually-Oriented Matter Involving a Minor - F2 §2907.322(A)(2) 25 Additional Count(s)	
Dates of Offense (on or about) 11/30/2016 to 04/14/2017	The Term Of January of 2017	Case Number 616368-17-CR

The State of Ohio, }
 Cuyahoga County } **SS.**

Count 1	Pandering Sexually-Oriented Matter Involving a Minor - F2 §2907.322(A)(2)
Defendants	Robert M. Arias
Date of Offense	On or about November 30, 2016

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, that the above named Defendant(s), on or about the date of the offense set forth above, in the County of Cuyahoga, unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 2	Pandering Sexually-Oriented Matter Involving a Minor - F2 §2907.322(A)(2)
Defendants	Robert M. Arias
Date of Offense	On or about November 30, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count 3 Pandering Sexually-Oriented Matter Involving a Minor - F2

§2907.322(A)(2)

Defendants Robert M. Arias

Date of Offense On or about December 9, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 4 Pandering Sexually-Oriented Matter Involving a Minor - F2

§2907.322(A)(2)

Defendants Robert M. Arias

Date of Offense On or about December 28, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 5 Pandering Sexually-Oriented Matter Involving a Minor - F2

§2907.322(A)(2)

Defendants Robert M. Arias

Date of Offense On or about December 28, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Foreperson of the Grand Jury

Prosecuting Attorney

Count 6 Pandering Sexually-Oriented Matter Involving a Minor - F2

§2907.322(A)(2)

Defendants Robert M. Arias

Date of Offense On or about December 28, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 7 Pandering Sexually-Oriented Matter Involving a Minor - F2

§2907.322(A)(2)

Defendants Robert M. Arias

Date of Offense On or about December 28, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 8 Pandering Sexually-Oriented Matter Involving a Minor - F2

§2907.322(A)(2)

Defendants Robert M. Arias

Date of Offense On or about December 28, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Foreperson of the Grand Jury

Prosecuting Attorney

Count 9 Pandering Sexually-Oriented Matter Involving a Minor - F2

§2907.322(A)(2)

Defendants Robert M. Arias

Date of Offense On or about December 28, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 10 Pandering Sexually-Oriented Matter Involving a Minor - F2

§2907.322(A)(2)

Defendants Robert M. Arias

Date of Offense On or about December 28, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 11 Pandering Sexually-Oriented Matter Involving a Minor - F2

§2907.322(A)(2)

Defendants Robert M. Arias

Date of Offense On or about December 28, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Foreperson of the Grand Jury

Prosecuting Attorney

Count 12 Pandering Sexually-Oriented Matter Involving a Minor - F2

§2907.322(A)(2)

Defendants Robert M. Arias

Date of Offense On or about December 28, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 13 Pandering Sexually-Oriented Matter Involving a Minor - F2

§2907.322(A)(2)

Defendants Robert M. Arias

Date of Offense On or about December 28, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 14 Pandering Sexually-Oriented Matter Involving a Minor - F2

§2907.322(A)(2)

Defendants Robert M. Arias

Date of Offense On or about February 16, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Foreperson of the Grand Jury

Prosecuting Attorney

Count 15 Pandering Sexually-Oriented Matter Involving a Minor - F2

§2907.322(A)(2)

Defendants Robert M. Arias

Date of Offense On or about February 21, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 16 Pandering Sexually-Oriented Matter Involving a Minor - F2

§2907.322(A)(2)

Defendants Robert M. Arias

Date of Offense On or about February 21, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, advertise for sale or dissemination, sell, distribute, transport, disseminate, exhibit, or display material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 17 Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F2

§2907.323(A)(1)

Defendants Robert M. Arias

Date of Offense On or about November 30, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did recklessly create, direct, produce, or transfer material or performance that shows a minor in a state of nudity in violation of Section 2907.323 of the Revised Code.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Foreperson of the Grand Jury

Prosecuting Attorney

Count 18 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F2**
 §2907.323(A)(1)

Defendants Robert M. Arias

Date of Offense On or about December 9, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did recklessly create, direct, produce, or transfer material or performance that shows a minor in a state of nudity in violation of Section 2907.323 of the Revised Code.
The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 19 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F2**
 §2907.323(A)(1)

Defendants Robert M. Arias

Date of Offense On or about January 2, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did recklessly create, direct, produce, or transfer material or performance that shows a minor in a state of nudity in violation of Section 2907.323 of the Revised Code.
The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 20 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F2**
 §2907.323(A)(1)

Defendants Robert M. Arias

Date of Offense On or about February 16, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did recklessly create, direct, produce, or transfer material or performance that shows a minor in a state of nudity in violation of Section 2907.323 of the Revised Code.
The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count 21 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F2**
 §2907.323(A)(1)

Defendants Robert M. Arias

Date of Offense On or about April 4, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did recklessly create, direct, produce, or transfer material or performance that shows a minor in a state of nudity in violation of Section 2907.323 of the Revised Code.
The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 22 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F2**
 §2907.323(A)(1)

Defendants Robert M. Arias

Date of Offense On or about April 12, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did recklessly photograph a minor who was not a child or ward of Robert M. Arias, in a state of nudity in violation of Section 2907.323 of the Revised Code.
The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 23 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F2**
 §2907.323(A)(1)

Defendants Robert M. Arias

Date of Offense On or about April 12, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did recklessly photograph a minor who was not a child or ward of Robert M. Arias, in a state of nudity in violation of Section 2907.323 of the Revised Code.
The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count 24 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F2**
 §2907.323(A)(1)

Defendants Robert M. Arias

Date of Offense On or about April 12, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did recklessly photograph a minor who was not a child or ward of Robert M. Arias, in a state of
 nudity in violation of Section 2907.323 of the Revised Code.
The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of
Ohio.

Count 25 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F4**
 §2907.323(A)(3)

Defendants Robert M. Arias

Date of Offense On or about December 25, 2016 to April 14, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did recklessly possess or view material or performance that shows a minor who was not Robert M.
 Arias's child or ward in a state of nudity in violation of Section 2907.323 of the Revised Code.
 FURTHERMORE, the defendant has previously been convicted of or plead guilty to Section
 2907.321, 2907.322, or 2907.323 of the Revised Code.
The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of
Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count 26 **Possessing Criminal Tools - F5**
 §2923.24(A)

Defendants Robert M. Arias

Date of Offense On or about November 30, 2016 to April 14, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did possess or have under the person's control any substance, device, instrument, or article, to wit: Samsung SM-J320A (s/n: R28H41B0FFE) with 32 GB Micro SD card and/or LG Smartphone model L34C (s/n: 409CQDG1181506) with 4GB micro SD card and/or LG Smartphone model L34C (s/n: 409CQUK1190078) with 4GB micro SD card and/or LG Smartphone model L34C (s/n: 409CQYQ1189850) with 8GB micro SD card with purpose to use it criminally.

FURTHERMORE, the Samsung SM-J320A (s/n: R28H41B0FFE) with 32 GB Micro SD card and/or LG Smartphone model L34C (s/n: 409CQDG1181506) with 4GB micro SD card and/or LG Smartphone model L34C (s/n: 409CQUK1190078) with 4GB micro SD card and/or LG Smartphone model L34C (s/n: 409CQYQ1189850) with 8GB micro SD card involved in the offense were intended for use in the commission of a felony, to wit: R.C. 2907.322 and/or R.C. 2907.323.

Forfeiture of Property - §2941.1417(A)

The Grand Jurors further find and specify that

the defendant(s) is/are the owner(s) and/or possessor(s) of Samsung SM-J320A (s/n: R28H41B0FFE) with 32 GB Micro SD card and/or LG Smartphone model L34C (s/n: 409CQDG1181506) with 4GB micro SD card and/or LG Smartphone model L34C (s/n: 409CQUK1190078) with 4GB micro SD card and/or LG Smartphone model L34C (s/n: 409CQYQ1189850) with 8GB micro SD card which is contraband and/or property derived from or through the commission or facilitation of an offense, and/or is an instrumentality the offender(s) used or intended to use in the commission or facilitation of a felony offense.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney