

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

State of Ohio, Plaintiff vs. Thomas E. Knuff Jr., Defendant		A True Bill Indictment For Aggravated Murder - UF §2903.01(A) 20 Additional Count(s)
Dates of Offense (on or about) 05/11/2017 to 06/21/2017	The Term Of May of 2017	Case Number 618285-17-CR

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

Count 1 **Aggravated Murder - UF**
 §2903.01(A)
Defendants Thomas E. Knuff Jr.
Date of Offense On or about May 11, 2017

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 purposely, and with prior calculation and design, cause the death of Regina M. Capobianco.

Course of Conduct Specification - §2929.04(A)(5)

The Grand Jurors further find and specify that

the offense at bar was part of a course of conduct involving the purposeful killing of or attempt to kill two or more persons, to wit: Regina M. Capobianco and John W. Mann by the offender..

Felony murder specification - §2929.04(A)(7)

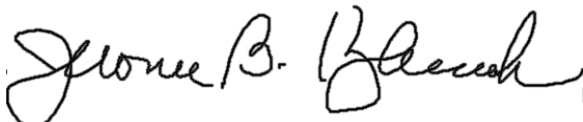
The Grand Jurors further find and specify that

the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Aggravated Burglary, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that

the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Kidnapping, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..



Foreperson of the Grand Jury



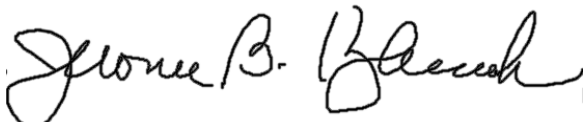
Prosecuting Attorney

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that

the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Aggravated Robbery, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

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 2 **Aggravated Murder - UF**
 §2903.01(B)

Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 11, 2017

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

did purposely cause the death of, Regina M. Capobianco while committing, or attempting to commit, or while fleeing immediately after committing or attempting to commit the offense of Aggravated Burglary &/or Kidnapping &/or Aggravated Robbery.

Course of Conduct Specification - §2929.04(A)(5)

The Grand Jurors further find and specify that

the offense at bar was part of a course of conduct involving the purposeful killing of or attempt to kill two or more persons, to wit: Regina M. Capobianco and John W. Mann by the offender..

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that

the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Aggravated Burglary, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that

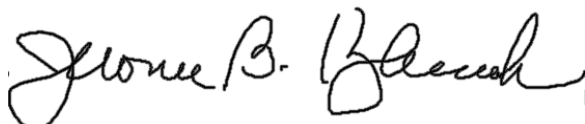
the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Kidnapping, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that

the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Aggravated Robbery, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

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 **Aggravated Murder - UF**
 §2903.01(A)

Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 11, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did purposely, and with prior calculation and design, cause the death of John W. Mann.

Course of Conduct Specification - §2929.04(A)(5)

The Grand Jurors further find and specify that

the offense at bar was part of a course of conduct involving the purposeful killing of or attempt to kill two or more persons, to wit: Regina M. Capobianco and John W. Mann by the offender..

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that

the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Aggravated Burglary, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that

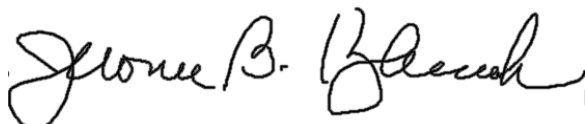
the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Kidnapping, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that

the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Aggravated Robbery, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

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 4 **Aggravated Murder - UF**
 §2903.01(B)

Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 11, 2017

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

did purposely cause the death of, John W. Mann while committing, or attempting to commit, or while fleeing immediately after committing or attempting to commit the offense of Aggravated Burglary &/or Kidnapping &/or Aggravated Robbery.

Course of Conduct Specification - §2929.04(A)(5)

The Grand Jurors further find and specify that

the offense at bar was part of a course of conduct involving the purposeful killing of or attempt to kill two or more persons, to wit: Regina M. Capobianco and John W. Mann by the offender..

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that

the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Aggravated Burglary, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that

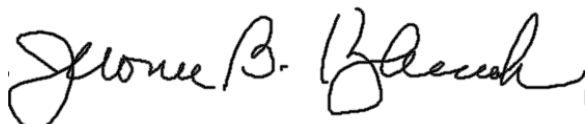
the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Kidnapping, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that

the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit Aggravated Robbery, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

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 5 **Aggravated Burglary - F1**
 §2911.11(A)(1)

Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 11, 2017

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

did, by force, stealth, or deception, trespass, as defined in section 2911.21(A)(1) of the Revised Code, in an occupied structure or in a separately secured or separately occupied portion of an occupied structure, when Regina M. Capobianco &/or John W. Mann, a person other than the accomplice, was present, with purpose to commit in the structure or in the separately secured or separately occupied portion of the structure a criminal offense, to wit: Aggravated Murder, RC 2903.01 A &/or B, and the offender recklessly inflicted, or attempted or threatened to inflict physical harm on Regina M. Capobianco &/or John W. Mann.

Notice of Prior Conviction - §2929.13(F)(6)

The Grand Jurors further find and specify that

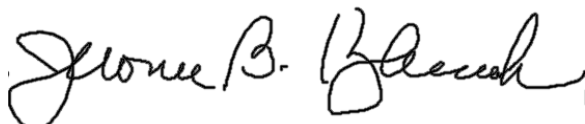
Thomas E. Knuff, Jr. previously was convicted of or pleaded guilty to Aggravated Robbery (F-1), and Thomas E. Knuff, Jr., with counsel, on or about the 11th day of February, 2002, in the Common Pleas Court, Cuyahoga County, Ohio, in Case No. CR 415117, was convicted of Aggravated Robbery (F-1), in violation of RC 2911.01 (F-1), of the State of Ohio.

Repeat Violent Offender Specification, "RVO" - §2941.149(A)

The Grand Jurors further find and specify that

Thomas E. Knuff, Jr. is a repeat violent offender, to wit: Thomas E. Knuff, Jr. was convicted of or pleaded guilty to Aggravated Robbery (F-1), to wit: the said Thomas E. Knuff, Jr., with counsel, on or about the 11th day of February, 2002, in the Common Pleas Court, Cuyahoga County, Ohio, in Case No. CR 415117, was convicted of the crime of Aggravated Robbery (F-1), in violation of RC 2911.01 (F-1), of the State of Ohio. The State hereby gives notice of its intention to use a certified copy of the prior conviction as proof of that conviction.

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 **Aggravated Robbery - F1**
 §2911.01(A)(3)
Defendants Thomas E. Knuff Jr.
Date of Offense On or about May 11, 2017

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

did, in attempting or committing a theft offense, as defined in section 2913.01 and 2913.02 of the Revised Code, or in fleeing immediately after the attempt or offense upon John W. Mann did inflict, or attempt to inflict, serious physical harm on John W. Mann.

Notice of Prior Conviction - §2929.13(F)(6)

The Grand Jurors further find and specify that

Thomas E. Knuff, Jr. previously was convicted of or pleaded guilty to Aggravated Robbery (F-1), and Thomas E. Knuff, Jr., with counsel, on or about the 11th day of February, 2002, in the Common Pleas Court, Cuyahoga County, Ohio, in Case No. CR 415117, was convicted of Aggravated Robbery (F-1), in violation of RC 2911.01 (F-1), of the State of Ohio.

Repeat Violent Offender Specification, "RVO" - §2941.149(A)

The Grand Jurors further find and specify that

Thomas E. Knuff, Jr. is a repeat violent offender, to wit: Thomas E. Knuff, Jr. was convicted of or pleaded guilty to Aggravated Robbery (F-1), to wit: the said Thomas E. Knuff, Jr., with counsel, on or about the 11th day of February, 2002, in the Common Pleas Court, Cuyahoga County, Ohio, in Case No. CR 415117, was convicted of the crime of Aggravated Robbery (F-1), in violation of RC 2911.01 (F-1), of the State of Ohio. The State hereby gives notice of its intention to use a certified copy of the prior conviction as proof of that conviction.

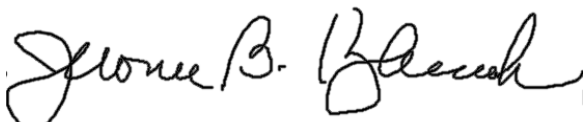
The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 7 **Grand Theft - F4**
 §2913.02(A)(1)
Defendants Thomas E. Knuff Jr.
Date of Offense On or about May 11, 2017

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

did with purpose to deprive the owner, John W. Mann, of a 1996 Honda Accord or services, knowingly obtain or exert control over either the property or services without the consent of the owner or person authorized to give consent and the property stolen is a motor vehicle.

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 8 **Theft - F5**
 §2913.02(A)(1)

Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 11, 2017

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

did with purpose to deprive the owner, John W. Mann, of a Cell Phone or services, knowingly obtain or exert control over either the property or services without the consent of the owner or person authorized to give consent.

FURTHERMORE, and the victim of the offense is an elderly person or disabled adult and the property or services stolen is valued at less than \$1,000.

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 9 **Kidnapping - F1**
 §2905.01(A)(3)

Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 11, 2017

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

did, by force, threat, or deception, purposely remove Regina M. Capobianco from the place where she was found or restrain the liberty of her for the purpose of terrorizing or inflicting serious physical harm upon Regina M. Capobianco or another.

Notice of Prior Conviction - §2929.13(F)(6)

The Grand Jurors further find and specify that

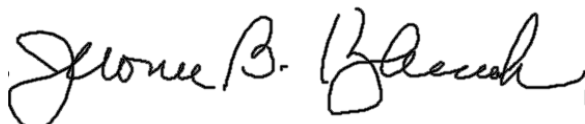
Thomas E. Knuff, Jr. previously was convicted of or pleaded guilty to Aggravated Robbery (F-1), and Thomas E. Knuff, Jr., with counsel, on or about the 11th day of February, 2002, in the Common Pleas Court, Cuyahoga County, Ohio, in Case No. CR 415117, was convicted of Aggravated Robbery (F-1), in violation of RC 2911.01 (F-1), of the State of Ohio.

Repeat Violent Offender Specification, "RVO" - §2941.149(A)

The Grand Jurors further find and specify that

Thomas E. Knuff, Jr. is a repeat violent offender, to wit: Thomas E. Knuff, Jr. was convicted of or pleaded guilty to Aggravated Robbery (F-1), to wit: the said Thomas E. Knuff, Jr., with counsel, on or about the 11th day of February, 2002, in the Common Pleas Court, Cuyahoga County, Ohio, in Case No. CR 415117, was convicted of the crime of Aggravated Robbery (F-1), in violation of RC 2911.01 (F-1), of the State of Ohio. The State hereby gives notice of its intention to use a certified copy of the prior conviction as proof of that conviction.

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 10 **Kidnapping - F1**
 §2905.01(A)(3)

Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 11, 2017

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

did, by force, threat, or deception, purposely remove John W. Mann from the place where he was found or restrain the liberty of him for the purpose of terrorizing or inflicting serious physical harm upon John W. Mann or another.

Repeat Violent Offender Specification, "RVO" - §2941.149(A)

The Grand Jurors further find and specify that

Thomas E. Knuff, Jr. is a repeat violent offender, to wit: Thomas E. Knuff, Jr. was convicted of or pleaded guilty to Aggravated Robbery (F-1), to wit: the said Thomas E. Knuff, Jr., with counsel, on or about the 11th day of February, 2002, in the Common Pleas Court, Cuyahoga County, Ohio, in Case No. CR 415117, was convicted of the crime of Aggravated Robbery (F-1), in violation of RC 2911.01 (F-1), of the State of Ohio. The State hereby gives notice of its intention to use a certified copy of the prior conviction as proof of that conviction.

Notice of Prior Conviction - §2929.13(F)(6)

The Grand Jurors further find and specify that

Thomas E. Knuff, Jr. previously was convicted of or pleaded guilty to Aggravated Robbery (F-1), and Thomas E. Knuff, Jr., with counsel, on or about the 11th day of February, 2002, in the Common Pleas Court, Cuyahoga County, Ohio, in Case No. CR 415117, was convicted of Aggravated Robbery (F-1), in violation of RC 2911.01 (F-1), of the State of Ohio.

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 **Gross Abuse Of A Corpse - F5**
 §2927.01(B)

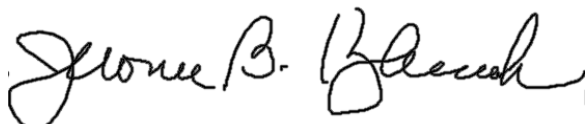
Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 11, 2017 to May 17, 2017

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

did, except as authorized by law, treat a human corpse in a way that would outrage reasonable community sensibilities.

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 **Gross Abuse Of A Corpse - F5**
 §2927.01(B)

Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 11, 2017 to May 17, 2017

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

did, except as authorized by law, treat a human corpse in a way that would outrage reasonable community sensibilities.

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 **Breaking And Entering - F5**
 §2911.13(A)

Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 17, 2017 to May 18, 2017

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

did, by force, stealth, or deception, trespass, as defined in section 2911.21(A)(1) of the Revised Code, in an unoccupied structure, the property of the Classic Hair Studio, with the purpose to commit therein any theft offense, as defined in Section 2913.01 and 2913.02 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 14 **Vandalism - F5**
 §2909.05(B)(1)(b)

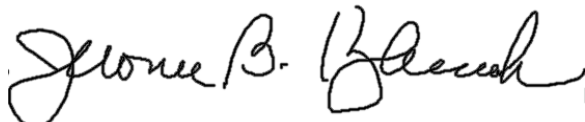
Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 17, 2017 to May 18, 2017

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

did knowingly cause physical harm to property that was owned or possessed by the Classic Hair Studio regardless of the value of the property or the amount of damage done and the property or its equivalent was necessary in order for its owner or possessor to engage in the owner's or possessor's profession, business, trade, or occupation.

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 **Theft - M1**
 §2913.02(A)(1)

Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 17, 2017 to May 18, 2017

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

did with purpose to deprive the owner, Classic Studio, of a Cash Register (Containing Cash/Money) or services, knowingly obtain or exert control over either the property or services without the consent of the owner or person authorized to give consent.

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 **Breaking And Entering - F5**
 §2911.13(A)

Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 17, 2017 to May 18, 2017

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

did, by force, stealth, or deception, trespass, as defined in section 2911.21(A)(1) of the Revised Code, in an unoccupied structure, the property of Spa & Nails, with the purpose to commit therein any theft offense, as defined in Section 2913.01 and 2913.02 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 17 **Vandalism - F5**
 §2909.05(B)(1)(b)

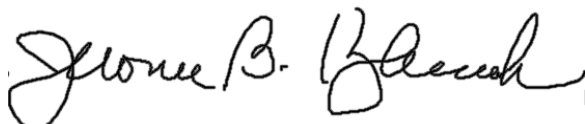
Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 17, 2017 to May 18, 2017

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

did knowingly cause physical harm to property that was owned or possessed by Spa & Nails regardless of the value of the property or the amount of damage done and the property or its equivalent was necessary in order for its owner or possessor to engage in the owner's or possessor's profession, business, trade, or occupation.

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 **Theft - M1**
 §2913.02(A)(1)

Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 17, 2017 to May 18, 2017

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

did with purpose to deprive the owner, Spa & Nails, of Money or services, knowingly obtain or exert control over either the property or services without the consent of the owner or person authorized to give consent.

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 **Attempted Tampering With Evidence - F4**
 §2923.02 / 2921.12(A)(1)

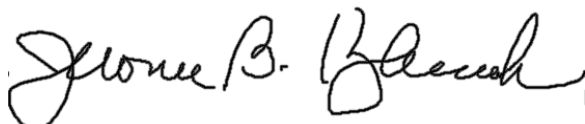
Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 11, 2017 to May 17, 2017

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

did, knowing that an official proceeding or investigation was in progress, or was about to be or likely to be instituted, attempt to alter, destroy, conceal, or remove any record, document, or thing, with purpose to impair its value or availability as evidence in such proceeding or investigation.

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 20 **Conspiracy - F2**
 §2923.01(A)(1)

Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 11, 2017 to June 21, 2017

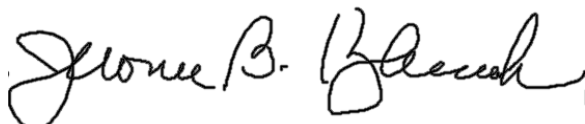
The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 , with purpose to commit or to promote or facilitate the commission of Aggravated Arson in violation of RC 2909.02 did, with another person or persons, plan or aid in planning the commission of Aggravated Arson in violation of RC 2909.02, and in furtherance of the conspiracy did undertake substantive overt acts, to wit: See Below::

FURTHERMORE, and the object of the conspiracy was a felony of the first degree, to wit:
 :Aggravated Arson:RC 2909.02 (F-1).

Thomas E. Knuff, Jr.:

1. Did solicit unindicted Co-Conspirator A to procure flammable materials; and/or
2. Did solicit unindicted Co-Conspirator A to contact unindicted Co-Conspirator B; and/or
3. Did solicit unindicted Co-Conspirator A to provide flammable materials to unindicted Co-Conspirator B for the purpose of unindicted Co-Conspirator B committing Aggravated Arson; and/or
4. Did solicit unindicted Co-Conspirator A to instruct unindicted Co-Conspirator B to focus on specific area(s) of the house located at 6209 Nelwood Dr., Parma Hts., Oh., to burn down to destroy evidence; and/or
5. Did solicit unindicted Co-Conspirator A to pay unindicted Co-Conspirator B in exchange for unindicted Co-Conspirator B committing Aggravated Arson.

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 **Conspiracy - F2**
 §2923.01(A)(2)

Defendants Thomas E. Knuff Jr.

Date of Offense On or about May 11, 2017 to June 21, 2017

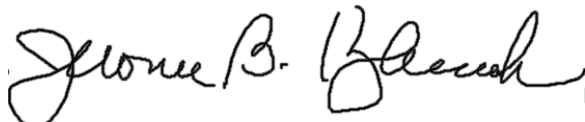
The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 , with purpose to commit or to promote or facilitate the commission of Aggravated Arson in violation of RC 2909.02 (F-1) did, agree with another person or persons that one or more of them will engage in conduct that facilitates the commission of Aggravated Arson in violation of RC 2909.02, and in furtherance of the conspiracy did undertake substantive overt acts, to wit: See Below:.

FURTHERMORE, and the object of the conspiracy was a felony of the first degree, to wit:
 :Aggravated Arson:RC 2909.02 (F-1).

Thomas E. Knuff, Jr.:

1. Did solicit unindicted Co-Conspirator A to procure flammable materials; and/or
2. Did solicit unindicted Co-Conspirator A to contact unindicted Co-Conspirator B; and/or
3. Did solicit unindicted Co-Conspirator A to provide flammable materials to unindicted Co-Conspirator B for the purpose of unindicted Co-Conspirator B committing Aggravated Arson; and/or
4. Did solicit unindicted Co-Conspirator A to instruct unindicted Co-Conspirator B to focus on specific area(s) of the house located at 6209 Nelwood Rd., Parma Hts., Oh., to burn down to destroy evidence; and/or
5. Did solicit unindicted Co-Conspirator A to pay unindicted Co-Conspirator B in exchange for unindicted Co-Conspirator B committing Aggravated Arson.

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