

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

State of Ohio, vs. Dominique C. Swopes,		Plaintiff Defendant	A True Bill Indictment For Aggravated Murder - UF §2903.01(A) 13 Additional Count(s)
Dates of Offense (on or about) 11/20/2018 to 11/23/2018	The Term Of September of 2018		Case Number 634935-18-CR

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

Count One	Aggravated Murder - UF §2903.01(A)
Defendants	Dominique C. Swopes
Date of Offense	On or about November 20, 2018
<p><i>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</i></p> <p>did purposely, and with prior calculation and design, cause the death of Rebecca Pletnewski.</p> <p>The State of Ohio reserves the right to seek a superseding indictment containing the appropriate 2929.04(A) Aggravating Circumstance(s)/Specification(s).</p> <p><i>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.</i></p>	

Count Two	Aggravated Murder - UF §2903.01(A)
Defendants	Dominique C. Swopes
Date of Offense	On or about November 20, 2018
<p><i>The grand jurors, on their oaths, further find that the Defendant(s) unlawfully</i></p> <p>did purposely, and with prior calculation and design, cause the death of Child Jane Doe DOB 02-28-2010.</p> <p>The State of Ohio reserves the right to seek a superseding indictment containing the appropriate 2929.04(A) Aggravating Circumstance(s)/Specification(s).</p> <p><i>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.</i></p>	



Foreperson of the Grand Jury



Prosecuting Attorney

Count Three **Aggravated Murder - UF**
 §2903.01(B)

Defendants Dominique C. Swopes

Date of Offense On or about November 20, 2018

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

did purposely cause the death of, Rebecca Pletnewski while committing, or attempting to commit, or while fleeing immediately after committing or attempting to commit the offense of Aggravated Burglary and/or Aggravated Arson and/or Aggravated Robbery.

The State of Ohio reserves the right to seek a superseding indictment containing the appropriate 2929.04(A) Aggravating Circumstance(s)/Specification(s).

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

Defendants Dominique C. Swopes

Date of Offense On or about November 20, 2018

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

did purposely cause the death of, Child Jane Doe DOB 02-28-2010 while committing, or attempting to commit, or while fleeing immediately after committing or attempting to commit the offense of Aggravated Burglary and/or Aggravated Arson and/or Aggravated Robbery.

The State of Ohio reserves the right to seek a superseding indictment containing the appropriate 2929.04(A) Aggravating Circumstance(s)/Specification(s).

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 Five **Aggravated Murder - UF**
 §2903.01(C)

Defendants Dominique C. Swopes

Date of Offense On or about November 20, 2018

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

did purposely cause the death of Child Jane Doe DOB 02-28-2010, who was under the age of thirteen years of age at the time of the commission of the offense, to wit, DOB 02-28-2010,.

The State of Ohio reserves the right to seek a superseding indictment containing the appropriate 2929.04(A) Aggravating Circumstance(s)/Specification(s).

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

Defendants Dominique C. Swopes

Date of Offense On or about November 20, 2018

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 Rebecca Pletnewski and/ or Child Jane Doe DOB 02-28-2010, 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 arson and/or aggravated robbery and/or felonious assault and/or theft offense, 2909.02 and/or 2911.01 and/or 2903.11 and/or 2913, and the offender recklessly inflicted, or attempted or threatened to inflict physical harm on Rebecca Pletnewski and/or Child Jane Doe DOB 02-28-2010.

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 Seven **Aggravated Burglary - F1**
 §2911.11(A)(2)

Defendants Dominique C. Swopes

Date of Offense On or about November 20, 2018

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 Rebecca Pletnewski and/ or Child Jane Doe DOB 02-28-2010, 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 arson and/or aggravated robbery and/or felonious assault and/or theft offense, 2909.02 and/or 2911.01 and/or 2903.11 and/or 2913, and the offender had a deadly weapon or dangerous ordnance, to wit: knife, on or about his person or under his control.

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 Eight **Aggravated Arson - F1**
 §2909.02(A)(1)

Defendants Dominique C. Swopes

Date of Offense On or about November 20, 2018

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

did by means of fire or explosion knowingly create a substantial risk of serious physical harm to Child Jane Doe DOB 02-28-2010.

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 Nine **Aggravated Arson - F2**
 §2909.02(A)(2)

Defendants Dominique C. Swopes

Date of Offense On or about November 20, 2018

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

did by means of fire or explosion knowingly cause physical harm to any occupied structure, to wit: a single family residence: 1531 Longwood Avenue, Mayfield Hts. 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 Ten **Aggravated Robbery - F1**
 §2911.01(A)(3)

Defendants Dominique C. Swopes

Date of Offense On or about November 20, 2018

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 Rebecca Pletnewski and/ or Child Jane Doe DOB 02-28-2010 did inflict, or attempt to inflict, serious physical harm on Rebecca Pletnewski and/ or Child Jane Doe DOB 02-28-2010.

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 Eleven Tampering With Evidence - F3
 §2921.12(A)(1)

Defendants Dominique C. Swopes

Date of Offense On or about November 20, 2018 to November 23, 2018

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, 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.

Count Twelve Receiving stolen property - M1
 §2913.51(A)

Defendants Dominique C. Swopes

Date of Offense On or about November 20, 2018

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

did receive, retain, or dispose of jewelry, the property of Rebecca Pletnewski, knowing or having reasonable cause to believe that the property had been obtained through commission of a theft 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.

Count Thirteen Murder - UF
 §2903.02(B)

Defendants Dominique C. Swopes

Date of Offense On or about November 20, 2018

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

did cause the death of Rebecca Pletnewski, as a proximate result of the offender committing or attempting to commit an offense of violence that is a felony of the first or second degree, to wit: felonious assault, in violation of Section 2903.02 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.



Foreperson of the Grand Jury



Prosecuting Attorney

Count Fourteen **Felonious Assault - F2**
 §2903.11(A)(1)
Defendants Dominique C. Swopes
Date of Offense On or about November 20, 2018

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
did knowingly cause serious physical harm to Rebecca Pletnewski.

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