

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

State of Ohio,  Plaintiff  VS.  Joanne Vega  Romaine Tolbert, Defendants	A True Bill Indictment For  <b>Murder - UF</b> §2903.02(B)  10 Additional Count(s)	
<b>Dates of Offense (on or about)</b> 03/01/2015 to 09/20/2017	<b>The Term Of</b> September of 2018	<b>Case Number</b> 636261-19-CR

The State of Ohio, }  
 Cuyahoga County } SS.

CR19636261-A

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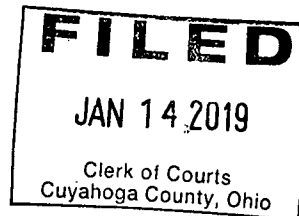


<b>Count One</b>	<b>Murder - UF</b> §2903.02(B)
<b>Defendants</b>	Joanne Vega, Romaine Tolbert
<b>Date of Offense</b>	On or about March 1, 2015 to September 20, 2017

*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 cause the death of Child John Doe DOB 02-20-2013, 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: Permitting Child Abuse RC 2903.15(A) and/or Endangering Children RC 2919.22(B) (1) and/or Felonious Assault RC 2903.11, 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.*



*[Handwritten Signature]*

Foreperson of the Grand Jury

*[Handwritten Signature]*

Prosecuting Attorney

**Count Two**      **Permitting Child Abuse - F1**  
                          §2903.15(A)  
**Defendants**      Joanne Vega, Romaine Tolbert  
**Date of Offense**    On or about March 1, 2015 to September 20, 2017

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

being the parent, guardian, custodian, or person having custody of a child under eighteen years of age or of a mentally or physically handicapped child under twenty-one years of age, did recklessly cause the death of Child John Doe DOB 02-20-2013 as a proximate result of permitting the child to be abused, to be tortured, to be administered corporal punishment or other physical disciplinary measure, or to be physically restrained in a cruel manner or for a prolonged period.

*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 Three**      **Felonious Assault - F2**  
                          §2903.11(A)(1)  
**Defendants**      Joanne Vega, Romaine Tolbert  
**Date of Offense**    On or about March 1, 2015 to September 20, 2017

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

did knowingly cause serious physical harm to Child John Doe DOB 02-20-2013.  
 remote fracture of right arm

*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**      **Felonious Assault - F2**  
                          §2903.11(A)(1)  
**Defendants**      Joanne Vega, Romaine Tolbert  
**Date of Offense**    On or about March 1, 2015 to September 20, 2017

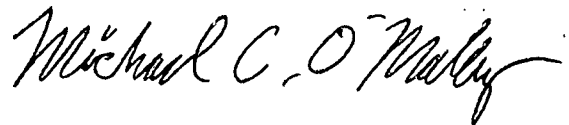
*The grand jurors, on their oaths, further find that the Defendant(s) unlawfully*

did knowingly cause serious physical harm to Child John Doe DOB 02-20-2013.  
 recent fracture of left arm

*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 Five**      **Endangering Children - F2**  
§2919.22(B)(1)

**Defendants**      Joanne Vega, Romaine Tolbert

**Date of Offense**    On or about March 1, 2015 to September 20, 2017

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

did, to Child John Doe DOB 02-20-2013, a child under eighteen years of age, 02/20/2013, or a mentally or physically handicapped child under twenty-one years of age, recklessly abuse the child.

FURTHERMORE, and the violation resulted in serious physical harm to Child John Doe DOB 02-20-2013.

remote fracture of right arm

*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 Six**      **Endangering Children - F2**  
§2919.22(B)(1)

**Defendants**      Joanne Vega, Romaine Tolbert

**Date of Offense**    On or about March 1, 2015 to September 20, 2017

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

did, to Child John Doe DOB 02-20-2013, a child under eighteen years of age, 02/20/2013, or a mentally or physically handicapped child under twenty-one years of age, recklessly abuse the child.

FURTHERMORE, and the violation resulted in serious physical harm to Child John Doe DOB 02-20-2013.

recent fracture of left arm

*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**      **Involuntary Manslaughter - F1**  
§2903.04(A)

**Defendants**      Joanne Vega, Romaine Tolbert

**Date of Offense**    On or about March 1, 2015 to September 20, 2017

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

did cause the death of Child John Doe DOB 02-20-2013 and such death was the proximate result of Joanne Vega committing or attempting to commit the felony offense of Permitting Child Abuse RC 2903.15(A) and/or Endangering Children RC 2919.22(B)(1) and/or Felonious Assault RC 2903.11.

*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**      **Endangering Children - F3**  
 §2919.22(A)  
**Defendants**      Joanne Vega, Romaine Tolbert  
**Date of Offense**   On or about March 1, 2015 to September 20, 2017

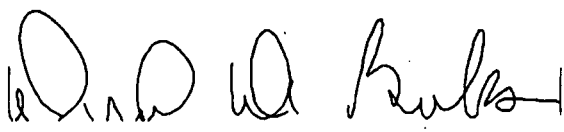
*The grand jurors, on their oaths, further find that the Defendant(s) unlawfully*  
 being a parent, guardian, custodian, person having custody or control, or person in loco parentis of a child under eighteen years of age, did recklessly create a substantial risk to the health or safety of Child John Doe DOB 02-20-2013, by violating a duty of care, protection, or support.  
 FURTHERMORE, and the violation resulted in serious physical harm to Child John Doe DOB 02-20-2013.  
*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.*

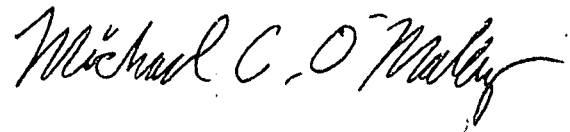
**Count Nine**      **Gross Abuse Of A Corpse - F5**  
 §2927.01(B)  
**Defendants**      Joanne Vega, Romaine Tolbert  
**Date of Offense**   On or about March 1, 2015 to September 20, 2017

*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 Ten**      **Tampering With Evidence - F3**  
 §2921.12(A)(1)  
**Defendants**      Joanne Vega, Romaine Tolbert  
**Date of Offense**   On or about March 1, 2015 to September 20, 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, 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 Eleven**      **Kidnapping - F1**  
                                  §2905.01(B)(2)

**Defendants**         Joanne Vega, Romaine Tolbert

**Date of Offense**   On or about March 1, 2015 to September 20, 2017

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

did, by any means, under circumstances that created a substantial risk of serious physical harm or caused physical harm to Child John Doe DOB 02-20-2013, a child under the age of thirteen years of age, to wit: DOB 02-20-2013, knowingly restrain Child John Doe DOB 02-20-2013 of his liberty.

Failure to return to biological parents

*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