# No. 3735 P. 2

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IN THE COURT	TOF COMMON PLEAS
MAHONIN	G-COUNTY, OHIO
STATE OF OHIO	) SECRET INDICTMENT
Plaintiff	) CASE NO.: 15 CR 685 JUDGE:
7 <b>\$.</b>	) <u>COUNTS 1-261</u> )
A) MICHAEL CAIN, aka "DOUGH," ***_**-5596,	<ul> <li>Engaging in a Pattern of Corrupt Activity ORC</li> <li>Section 2923.32(A)(1)</li> </ul>
1956 Cherry Hill Aye., Youngstown, OH 44509	<ul> <li>Complicity to Trafficking in Heroin ORC</li> <li>Sections 2923.03 and 2925.03(A)(1)/(2)(C)(6)</li> </ul>
358 S. Truesdale Ave., Youngstown, OH 44506	) Trafficking in Heroin ORC Section ) 2925.03(A)(1)/(2)(C)(6)
173 S. Truesdale Ave., Youngstown, OH 44506	) Trafficking in Cocaine ORC Section ) 2925.03(A)(1)(C)(4)
108 Lincoln Park Dr., Youngstown, OH 44516	<ul> <li>Possession of Cocaine ORC Section</li> <li>2925.11(A)(C)(4)</li> </ul>
<b>B) RAYMOND WRIGHT,</b> ***-**- 7972,	<ul> <li>Possession of Heroin ORC Section</li> <li>2925.11(A)(C)(6)</li> </ul>
220 Kendis Cir. Apt. A, Youngstown, OH 44505	<ul> <li>Aggravated Possession of Drugs ORC Section</li> <li>2925.11(A)(C)(1)</li> </ul>
130 S. Forrest Ave., Youngstown, OH 44506	<ul> <li>Aggravated Trafficking In Drugs ORC Section</li> <li>2925.03(A)(1)(C)</li> </ul>
C) TERRENCE RUSHTON, aka "T," *****-9344,	<ul> <li>Money Laundering ORC Section</li> <li>1315.55(A)(1/3)</li> </ul>
445 Salt Springs Rd., Youngstown, OH 44509	<ul> <li>Felonious Assault ORC Section 2903.11(A)(2)</li> <li>Weapon Under Disability Section ORC Section</li> </ul>
50 Halls Heights Ave., Youngstown, OH 44509	<ul> <li>appendix Disability Section once Section</li> <li>2923.13(A)(3)</li> <li>Possession of Marijuana ORC Section</li> </ul>
36 Gladstone Rd., Campbell, OH 44405	) 2925.11(A)(C)(3)

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1	F) ASHANTI BUNCH, aka "AD," * **-5890,	**_	j)							
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	.) KELVIN CRENSHAW, ***_**- 465,		$\left \right\rangle$				R				ě
. 1	238 E. Lucius Ave., Youngstown, OH 44507		5		S*		•				
	M) CHARLES FROHMAN, ***_**		)	_		<u> </u>		<u> </u>		 ~	

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44502 ) T) ALBERT SANTIAGO, \*\*\*-\*\*-) ) 2267, ) 3580 W. Middleton Rd., Columbiana, ) ) OH 44502 ) U) RANDY COX, \*\*\*-\*\*-0467, ) ) 1350 Maplecrest Dr., Austintown, OH ) ) 44515 ) V) JASON CURRIE, \*\*\*-\*\*-7154, ) ) 154 S. Kimberly Ave., Austintown, OH ) ) 44515 ) 275 Belmont Ave. NW, Warren, OH ) ) 44502 ) W) KIM DAVIS, \*\*\*-\*\*-5901 ) ) 7630 Satet Route 164, Lisbon, OH 44432 ) ) X) NICK DAVIS, \*\*\*-\*\*-7953, ) ) 895 Mayfield Dr., Youngstown, OH ) 44512 ) ) Y) NATALIE HABIB, aka "NATALIE ) GOOD," \*\*\*\_\*\*-5966 ) ) 51 South Salem-Warren Rd. #1, North ) Jackson, OH 44451 ) ) 269 Idlewood Rd., Austintown, OH ) 44515 ) ) Z) KATIE GRIST, \*\*\*-\*\*-3681, ) ) 1764 Market Street, Youngstown, OH ) 44507 ) ) AA) LUCAS HANSHAW, \*\*\*\_\*\*-) 1741, )



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THE JURORS OF THE MAHONING COUNTY GRAND JURY of the State of Ohio on

their oaths, in the name and authority of the State of Ohio, do find and present that:

#### COUNT 1

On or between 06/13/14 and 04/29/15, in a continuing course of conduct in the County of Mahoning, the State of Ohio, the Defendants; A) MICHAEL CAIN, aka "DOUGH;" B) RAYMOND WRIGHT; C) TERRENCE RUSHTON, aka "T," D) KEITH JOHNSON, aka "BEAR;" E) HIAWATHA JOHNSON, aka "YODA:" F) ASHANTI BUNCH, aka "AD;" M) "BEAR;" E) HIAWATHA JOHNSON, aka "YODA:" F) ASHANTI BUNCH, aka "AD;" M) CHARLES FROHMAN; N) TREVON HOWELL; Q) BRANDON WILLIAMS; R) SHENIKA RUSHTON, aka "NIKA;" U) RANDY COX; HH) HEIDI SMITH; JJ) JAMES VESPASIAN, did while associated with an enterprise, did conduct or participate in, either directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity. The defendants engaged in, to engage in, attempted to engage in, or coerced another to engage in violations of the law including, but not limited to, Trafficking in Heroin, Trafficking in Cocaine, Conspiracy to Trafficking in Heroin, Possession of Heroin, and Possession of Cocaine, as set out in the subsequent counts and incorporated as fully restated herein. At least one of the incidents of corrupt activity is a felony of the THIRD degree or higher. This is in violation of 2923.32(A)(1) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to-wit: ENGAGING IN A PATTERN OF CORRUPT ACTIVITY, constitutes a felony of the FIRST Degree.

The Jurors of the Grand Jury DO FURTHER FIND AND PRESENT that the enterprise included the following individuals and/or persons associated in fact although not a legal entity:

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TERRENCE RUSHTON, aka "T" MICHAEL CAIN, aka "DOUGH;" RAYMOND WRIGHT; KEITH JOHNSON, aka "BEAR;" HIAWATHA JOHNSON, aka "YODA;" ASHANTI BUNCH, aka "AD;" CHARLES FROHMAN; TREVON HOWELL; BRANDON WILLIAMS; SHENIKA RUSHTON, aka "NIKA;" RANDY COX; HEIDI SMITH;

JAMES VESPASIAN;

On two or more occasions, individuals associated with the enterprise directly or indirectly committed one or more of the following:

Trafficking in Heroin 2925.03(A)(1)/(2)(C)(6) Complicity to Trafficking in Heroin 2923.03 and 2925.03(A)(1)/(2)(C)(6) Trafficking in Cocaine 2925.03(A)(1)(C)(4) Possession of Cocaine 2925.11(A)(C)(4) Possession of Heroin 2925.11(A)(C)(6) Aggravated Possession Of Drugs Section 2925.11(A)(C)(1) Aggravated Trafficking In Drugs 2925.03(A)(1)(C)

### COUNT 2

On or between 06/13/14 and 04/29/15, in the County of Mahoning, and State of Ohio, A) MICHAEL CAIN, aka "DOUGH;" B) RAYMOND WRIGHT; C) TERRENCE RUSHTON, aka "T," D) KEITH JOHNSON, aka "BEAR;" E) HIAWATHA JOHNSON, aka "YODA;" F) ASHANTI BUNCH, aka "AD;" G) RODNEY CARTER; M) CHARLES FROHMAN; N) TREVON HOWELL; Q) BRANDON WILLIAMS; R) SHENIKA RUSHTON, aka "NIKA;" U) TREVON HOWELL; Q) BRANDON WILLIAMS; R) SHENIKA RUSHTON, aka "NIKA;" U) RANDY COX; X) NICK DAVIS; HH) HEIDI SMITH; JJ) JAMES VESPASIAN;, did knowingly, acting with the kind of culpability required for the commission of an offense, aid or abet another in committing Trafficking in Heroin, or any compound, mixture, preparation, or abstance containing Heroin, in an amount exceeding 250 grans, a violation of Section 2925.03(A)(1)/(2)(C)(6) of the Revised Code, (in violation of Section 2923.03 of the Ohio Revised Code) in such case made and provided, and against the peace and dignity of the State of Ohio.

This act, to-wit: COMPLICITY TO TRAFFICKING IN HEROIN, constitutes a felony of the First Degree.

SPECIFICATION 1 TO COUNT 2:

The Grand Jurors further find and specify that A)MICHAEL CAIN, aka "DOUGH;" B) RAYMOND WRIGHT; C) TERRENCE RUSHTON, aka "T;" D) KEITH JOHNSON, aka "BEAR;" E) HIAWATHA JOHNSON, aka "YODA;" F) ASHANTI BUNCH, aka "AD;" G) RODNEY CARTER; M) CHARLES FROHMAN; N) TREVON HOWELL; Q) BRANDON WILLIAMS; R) SHENIKA RUSHTON, aka "NIKA;" U) RANDY COX; X) NICK DAVIS; HH) HEIDI SMITH; JJ) JAMES VESPASIAN;, are major drug offenders as set forth in Section 2929.01(W) in that they are convicted of or plead guilty to Conspiracy to Trafficking in Heroin, or any compound, mixture, preparation, or substance containing heroin, of at least 250 grams of heroin, a Schedule I controlled substance, in violation of 2923.01(A)(2) and

heroin, a Schedule I controlled substance, in violation of 2925.01(A)(2) and 2925.03(A)/(2)(1)(C)(6), contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

# FORFEITURE SPECIFICATION 2 TO COUNT 2;

The Grand Jurors further find and specify that Defendant C) TERRANCE RUSHTON's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, to-wit: 1 Box of 9mm caliber ammunition, 1 Box of .40 caliber ammunition, 1 green body armor, 2 AK Assault Rifle magazines, 1 AR 15 magazine, 2 Boxes of 7.62 ammunition, 2 Boxes of 39mm ammunition, 2 Boxes of .223 caliber ammunition, 1 stun gun, a Sterling Arms .25 caliber handgun, Serial #044199, a Masterpiece Arms, 9mm handgun, Serial #F2394, 1 SPRINT cell phone, 1 blue cell phone, 2 SAMSUNG cell phones, \$1,535.00 in U.S. Currency, 2 Debit/ Pre-paid cards, 2005 Jeep Grand Cherokee (License Plate: DFB 2338), 2006, White, Dodge Charger (License Plate: FXP 3880), pursuant to Ohio Revised Code Section 2941.1417.

# FORFEITURE SPECIFICATION 3 TO COUNT 2:

The Grand Jurors further find and specify that Defendant A) MICHAEL CAIN's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, to-wit: 2 LG phones, 1 SAMSUNG cell phone, 2011 White, Buick Regal (License Plate: GBY wit: 2 LG phones, 1 SAMSUNG cell phone, 2011 White, Buick Regal (License Plate: GBY 6691) and \$1,278.00 U.S. Currency pursuant to Ohio Revised Code Section 2941.1417.

# FORFEITURE SPECIFICATION 4 TO COUNT 2:

The Grand Jurors further find and specify that Defendant B) RAYMOND WRIGHT's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, to-wit: 1 Kyocera cell phone, 2 SAMSUNG cell phones, 1 LG cell phone, 1 Kyocera cell phone, 15 cell phones, 5 rounds of rifle ammunition, and a Dark Blue dodge Magnum (License Plate: GHZ 7881) and \$2, 995.00 U.S. Currency pursuant to Ohio Revised Code Section 2941.1417.

# FORFEITURE SPECIFICATION 5 TO COUNT 2:

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The Grand Jurors further find and specify that Defendant D) KEITH JOHNSON's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, towit: 2001 Teal, BMW (License Plate: GGV 9543), \$889.00 in U.S. Currency, pursuant to Ohio

Revised Code Section 2941.1417.

# FORFEITURE SPECIFICATION 6 TO COUNT 2:

The Grand Jurors further find and specify that Defendant E) HIAWATHA JOHNSON's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, to-wit: 1 Black SAMSUNG phone, 1 White SAMSUNG phone, 1 NOKIA cell phone, 2 9mm rounds, 1 Bullet proof vest, 1 SAMSUNG DVR, pursuant to Ohio Revised Code Section

2941.1417

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# FORFEITURE SPECIFICATION 7 TO COUNT 2:

The Grand Jurors further find and specify that Defendant F) ASHANTI BUNCH's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, towit: 1 Box of .45 caliber Winchester ammunition, 2 Black Kyocera cell phones, 1 Pink SAMSUNG cell phone, 1 Verizon SAMSUNG cell phone, 1 Black & Red Kyocera cell phone, 1 Black & Red Verizon cell phone, pursuant to Ohio Revised Code Section 2941.1417.

# FORFEITURE SPECIFICATION 8 TO COUNT 2:

The Grand Jurors further find and specify that Defendant C) TERRANCE RUSHTON's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, to-wit: 2 Motorola cell phones, pursuant to Ohio Revised Code Section 2941.1417.

# FORFEITURE SPECIFICATION 9 TO COUNT 2:

The Grand Jurors further find and specify that Defendant R) SHENIKA RUSHTON's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, to-wit: 1 Phoenix Arms .25 caliber handgun, Serial #4278432, 1.40 caliber Smith & Wesson handgun, Serial #MRM0087, 16 rounds of .40 caliber ammunition, 1. 40 caliber ammunition magazine, 1 Box of 9mm caliber ammunition, 1 Box of .40 caliber ammunition, 1 green body armor, 2 AK Assault Rifle magazines, 1 AR 15 magazine, 2 Boxes of 7.62 ammunition, 2 Boxes of 39mm ammunition, 2 Boxes of .223 caliber ammunition, 1 stun gun, 1 SPRINT cell phone, 1 blue cell phone, 2 SAMSUNG cell phones, \$1,535.00 in U.S. Currency, 2 Debit/ Pre-paid cards, 2005 Jeep Grand Cherokee (License Plate: DFB 2338), 2006, White, Dodge Charger (License Plate: FXP 3880) pursuant to Ohio Revised Code Section 2941.1417.

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# COUNT 3

On or about 2/20/15, in the County of Mahoning, and State of Ohio, one A) MICHAEL CAIN, aka "DOUGH, did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 10 grams, but is less than 50 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State

of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

# FORFEITURE SPECIFICATION TO COUNT 3:

The Grand Jurors further find and specify that Defendant A) MICHAEL CAIN's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, towit: 2 LG phones, 1 SAMSUNG cell phone, 2011 White, Buick Regal (License Plate: GBY 6691) and \$1,278.00 U.S. Currency pursuant to Ohio Revised Code Section 2941.1417.

# COUNT 4

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On or about 3/13/15, in the County of Mahoning, and State of Ohio, one A) MICHAEL CAIN, aka "DOUGH, did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 10 grams, but is less than 50 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

### COUNT 5

On or about 3/27/15, in the County of Mahoning, and State of Ohio, one A) MICHAEL CAIN, aka "DOUGH," did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 10 grams, but is less than 50 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State

of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

# COUNT 6

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On or about 3/27/15, in the County of Mahoning, and State of Ohio, A) MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," did prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when, A) MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," knew or had reasonable cause to believe that the controlled substance was intended for resale by A) MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," or another person, in MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," or another person, in an amount that equals or exceeds 10 grams but is less than 50 grams in weight, in violation of Section 2925.03(A)(2)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

# COUNT 7

On or about 3/28/15, in the County of Mahoning, and State of Ohio, A) MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," did prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when , A) MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," knew or had reasonable cause to believe that the controlled substance was intended for resale by A) MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," or another person, in MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," or another person, in an amount that equals or exceeds 10 grams but is less than 50 grams in weight, in violation of Section 2925.03(A)(2)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

#### COUNT 8

On or about 3/29/15, in the County of Mahoning, and State of Ohio, one A) MICHAEL CAIN, aka "DOUGH," did knowingly, sell or offer to sell, heroin, or any compound, mixture, aration, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 10 grams, but is less than 50 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

### COUNT 9

On or about 3/29/15, in the County of Mahoning, and State of Ohio, A) MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," did prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when, A) MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," knew or had reasonable cause to believe that the controlled substance was intended for resale by A) mICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," or another person, in MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," or another person, in an amount that equals or exceeds 10 grams but is less than 50 grams in weight, in violation of Section 2925.03(A)(2)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

### <u>COUNT 10</u>

On or about 3/31/15, in the County of Mahoning, and State of Ohio, one A) MICHAEL CAIN, aka "DOUGH," did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 5 grams, but is less than 10 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(d) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the THIRD Degree.

### <u>COUNT 11</u>

On or about 4/1/15, in the County of Mahoning, and State of Ohio, one A) MICHAEL CAIN, aka "DOUGH," did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 50 grams, but is less than 250 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(f) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIRST Degree.

### <u>COUNT 12</u>

On or about 4/1/15, in the County of Mahoning, and State of Ohio, A) MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," did prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when, A) MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," knew or had reasonable cause to believe that the controlled substance was intended for resale by A) MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," or another person, in

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an amount that equals or exceeds 10 grams but is less than 50 grams in weight, in violation of Section 2925.03(A)(2)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

#### COUNT 13

On or about 4/2/15, in the County of Mahoning, and State of Ohio, A) MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," did prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when, A) MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," knew or had reasonable cause to believe that the controlled substance was intended for resale by A) MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," or another person, in MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," or another person, in MICHAEL CAIN, aka "DOUGH," and F) ASHANTI BUNCH, aka "AD," or another person, in section 2925.03(A)(2)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

#### COUNT 14

On or about 4/3/15, in the County of Mahoning, and State of Ohio, one A) MICHAEL CAIN, aka "DOUGH," did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 10 grams, but is less than 50 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

### <u>COUNT 15</u>

On or about 4/10/15, in the County of Mahoning, and State of Ohio, one A) MICHAEL CAIN, aka "DOUGH," did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 10 grams, but is less than 50 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

# COUNT 16

On or about 4/29/15 in the County of Mahoning and State of Ohio, Defendant A) MICHAEL CAIN, aka "DOUGH," did knowingly obtain, possess, or use a drug, marijuana, a Schedule I controlled substance in an amount that equals or exceeds 5,000 grams, but is less than 20,000 grams in violation of Section 2925.11(A)(C)(3)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF MARIJUANA, constitutes a felony of the THIRD Degree.

### <u>COUNT\_17</u>

On or about 04/29/15 in the County of Mahoning, and State of Ohio, Defendant A) MICHAEL CAIN, aka "DOUGH," did, without being relieved from disability as provided in Section 2923.14 of the Revised Code, knowingly did acquire, have, carry, or use any firearm or dangerous ordnance, to wit: a Charter Arms .38 caliber handgun, and knowingly has been convicted of a felony offense involving the illegal possession, use, sale, administration, distribution, or trafficking in any drug of abuse, in violation of Section 2923.13(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: HAVING WEAPONS WHILE UNDER DISABILITY, constitutes a felony of the THIRD Degree.

# FORFEITURE SPECIFICATION TO COUNT 17.

The Grand Jurors further find and specify that Defendant A) MICHAEL CAIN's ownership, right, title, or interest in the Charter Arms, 38 caliber handgun, Serial # 133922, shall be subject to forfeiture to the State of Ohio, possession of which by him constituting a felony offense, pursuant to Ohio Revised Code Section 2941.1417.

# COUNT 18

On or about 3/7/15, in the County of Mahoning, and the State of Ohio, B) RAYMOND WRIGHT, did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 5 grams but is less than 10 grams in weight, in violation of Section 2925.03(A)(1)(C)(6)(d) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the THIRD Degree.

#### COUNT 19

On or about 3/8/15, in the County of Mahoning, and the State of Ohio, B) RAYMOND WRIGHT, did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but is less than 5 grams in weight, in violation of Section

2925.03(A)(1)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

### <u>COUNT 20</u>

On or about 3/9/15, in the County of Mahoning, and the State of Ohio, B) RAYMOND WRIGHT, did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but is less than 5 grams in weight, in violation of Section 2925.03(A)(1)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

### <u>COUNT 21</u>

On or about 3/25/15, in the County of Mahoning, and the State of Ohio, B) RAYMOND WRIGHT, did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 5 gram but is less than 10 grams in weight, in violation of Section 2925.03(A)(1)(C)(6)(d) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the THIRD Degree.

# FORFEITURE SPECIFICATION TO COUNT 21:

The Grand Jurors further find and specify that Defendant B) RAYMOND WRIGHT's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, to-wit: 1 Kyocera cell phone, 2 SAMSUNG cell phones, 1 LG cell phone, 1 Kyocera cell phone, 15 cell phones, 5 rounds of rifle ammunition, and a Dark Blue dodge Magnum (License Plate: GHZ 7881) and \$2, 995.00 U.S. Currency pursuant to Ohio Revised Code Section 2941.1417.

### <u>COUNT 22</u>

On or about 12/12/14, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance in violation of Section 2925.03(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

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This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 23

On or about 12/16/14, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance in an amount that equals or exceeds 1 gram but is less than 5 grams in weight, in violation of Section 2925.03(A)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

### COUNT 24

On or about 12/30/14, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance in violation of Section 2925.03(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

### <u>COUNT 25</u>

On or about 1/6/15, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance in an amount that equals or exceeds 1 gram but is less than 5 grams in weight, in violation of Section 2925.03(A)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

# COUNT 26

On or about 1/15/15, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance in an amount that equals or exceeds 1 gram but is less than 5 grams in weight, in violation of Section 2925.03(A)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

#### <u>COUNT 27</u>

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On or about 1/20/15/5, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance in violation of Section 2925.03(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 28

On or about 2/9/15, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance in violation of Section 2925.03(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 29

On or about 2/12/15, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance in violation of Section 2925.03(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 30

On or about 2/20/15, in the County of Mahoning, and the State of Ohio, TERRENCE RUSTHON, aka "T," did knowingly sell or offer to sell a controlled substance, Alprazolam/Xanax, a compound, mixture, preparation, or substance included in Schedule IV, the amount of drug is less than the bulk amount, in violation of Section 2925.03(A)(C)(2)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: AGGRAVATED TRAFFICKING IN DRUGS, constitutes a felony of the FIFTH Degree.

# COUNT 31

On or about 2/23/15, in the County of Mahoning, and State of Ohio, one C) TERRENCE. RUSHTON, aka "T," did knowingly obtain, possess, or use a drug, Oxycodone/Acetaminophen, a compound, mixture, preparation, or substance included in Schedule II, in violation of Section 2925.11(A)(C)(1)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

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This act, to wit: AGGRAVATED POSSESSION OF DRUGS, constitutes a felony of the FIFTH Degree.

### COUNT 32

On or Between 2/20/15 and on or about 2/26/15, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 10 grams, but is less than 50 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

### COUNT 33

On or about 2/27/15 in the County of Mahoning, and State of Ohio, A) MICHAEL CAIN, aka "DOUGH," C) TERRENCE RUSHTON, aka "T," D) KEITH JOHNSON, aka "BEAR," E) HIAWATHA JOHNSON, aka "YODA," did knowingly, sell or offer to sell, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 50 grams, but is less than 250 grams in weight, when , A) MICHAEL CAIN, aka "DOUGH," C) TERRENCE RUSHTON, aka "T," D) KEITH JOHNSON, aka "BEAR," and E) HIAWATHA JOHNSON, aka "YODA," solicited or procured another to commit the offense of TRAFFICKING, aided or abetted another to commit the offense of TRAFFICKING, OR conspired with another person to commit the offense of TRAFFICKING, in violation of Sections and 2923.03(A) and 2925.03(A)(2)(C)(6)(f) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: COMPLICITY TO TRAFFICKING IN HEROIN, constitutes a felony of the FIRST Degree.

### COUNT 34

On or about 3/12/15, in the County of Mahoning, and the State of Ohio, C) TERRENCE RUSHTON, aka "T," did knowingly obtain, possess, or use a drug, Tramadol, a compound, mixture, preparation, or substance included in Schedule IV, the amount of drug is less than the bulk amount, in violation of Section 2925.11(A)(C)(2)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: AGGRAVATED POSSESSION OF DRUGS, constitutes a felony of the FIFTH Degree.

#### COUNT 35

On or Between 3/13/15 and on or about 3/21/15, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 10 grams, but is less than 50 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

### <u>COUNT 36</u>

On or about 3/16/15, in the County of Mahoning, and State of Ohio, C) TERRENCE RUSHTON, aka "T," did knowingly sell or offer to sell Cocaine, or any compound, mixture, preparation, or substance containing heroin, a Schedule II controlled substance, in violation of Section 2925.03(A)(1)(C)(4)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN COCAINE, constitutes a felony of the FIFTH Degree.

# COUNT 37

On or about 3/19/15, in the County of Mahoning, and the State of Ohio, C) TERRENCE RUSHTON, aka "T," did knowingly sell or offer to sell a controlled substance, Alprazolam/Xanax, a compound, mixture, preparation, or substance included in Schedule IV, the amount of drug is less than the bulk amount, in violation of Section 2925.03(A)(C)(2)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: AGGRAVATED TRAFFICKING IN DRUGS, constitutes a felony of the FIFTH Degree.

# COUNT 38

On or about 3/20/15, in the County of Mahoning, and the State of Ohio, C) TERRENCE RUSHTON, aka "T," did knowingly sell or offer to sell a controlled substance, Alprazolam/Xanax, a compound, mixture, preparation, or substance included in Schedule IV, the amount of drug is less than the bulk amount, in violation of Section 2925.03(A)(C)(2)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

COUNT 39

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This act, to wit: AGGRAVATED TRAFFICKING IN DRUGS, constitutes a felony of the FIFTH Degree.

On or about 3/21/15, in the County of Mahoning, and State of Ohio, C) TERRENCE RUSHTON, aka "T," did knowingly sell or offer to sell Cocaine, a Schedule II controlled substance, in violation of Section 2925.03(A)(1)(C)(4)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN COCAINE, constitutes a felony of the FIFTH Degree.

### COUNT 40

On or about 3/22/15, in the County of Mahoning, and State of Ohio, A) MICHAEL CAIN, aka "DOUGH," C) TERRENCE RUSHTON, aka "T," D) KEITH JOHNSON, aka "BEAR," E) "HAWATHA JOHNSON, aka "YODA," L) KELVIN CRENSHAW; N) TREVON HOWELL; Q) BRANDON WILLIAMS, and, prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when , A) MICHAEL CAIN, aka "DOUGH," C) TERRENCE RUSHTON, aka "T," and D) KEITH JOHNSON, aka "BEAR," L) "DOUGH," C) TERRENCE RUSHTON, aka "T," and D) KEITH JOHNSON, aka "BEAR," L) KELVIN CRENSHAW, N) TREVON HOWELL, and Q) BRANDON WILLIAMS, knew or had reasonable cause to believe that the controlled substance was intended for resale by A) MICHAEL CAIN, aka "DOUGH," C) TERRENCE RUSHTON, aka "T," D) KEITH JOHNSON, aka "BEAR," E) HIAWATHA JOHNSON, aka "YODA," L) KELVIN CRENSHAW; N) TREVON HOWELL; and Q) BRANDON WILLIAMS, , or another person, in an amount that equals or exceeds 50 grams but is less than 250 grams in weight, in the vicinity of a juvenile, in violation of Section 2925.03(A)(2)(C)(6)(f) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIRST Degree.

# <u>COUNT 41</u>

On or about 3/25/15 in the County of Mahoning, and State of Ohio, A) MICHAEL CAIN, aka "DOUGH," C) TERRENCE RUSHTON, aka "T," and N) TREVON HOWELL, prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when, A) MICHAEL CAIN, aka "DOUGH;" C) TERRENCE RUSHTON, aka "T," and N) TREVON HOWELL, knew or had reasonable cause to believe that the controlled substance was intended for resale by A) MICHAEL CAIN, aka "DOUGH," C) TERRENCE RUSHTON, aka "T," and N) TREVON HOWELL or another person, in an amount that equals or exceeds 10 grams but is less than 50 grams in weight, in the vicinity of a juvenile, in violation of Section 2925.03(A)(2)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

#### COUNT 42

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On or Between 3/27/15 and on or about 3/28/15, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 10 grams, but is less than 50 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

### <u>COUNT 43</u>

On or Between 3/29/15 and on or about 3/30/15, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 10 grams, but is less than 50 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

### <u>COUNT 44</u>

On or about 3/31/15, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 5 grams, but is less than 10 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(d) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the THIRD Degree.

#### COUNT 45

On or Between 4/1/15 and on or about 4/2/15, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 50 grams, but is less than 250 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(f) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIRST Degree.

### COUNT 46

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On or about 4/3/15, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule 1 controlled substance, in an amount that equals or exceeds 10 grams, but is less than 50 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State

of Ohio. This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

#### COUNT 47

Between 4/4/15 through 4/9/15, in the County of Mahoning, and State of Ohio, A) MICHAEL CAIN, aka "DOUGH," C) TERRENCE RUSHTON, aka "T," and L) KELVIN CRENSHAW, prepared for shipment, shipped, transported, delivered, prepared for distribution, or distributed a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when , C) TERRENCE RUSHTON, aka "T," A) MICHAEL CAIN, aka "DOUGH," and L) KELVIN CRENSHAW, knew or had reasonable cause to believe that the controlled substance was intended for resale by C) TERRENCE RUSHTON, aka "T," L) KELVIN CRENSHAW or another person, in an amount that equals or exceeds 50 grams but is less than 250 grams in weight, in the vicinity of a juvenile, in violation of Section 2925.03(A)(2)(C)(6)(f) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN constitutes a felony of the FIRST Degree.

### COUNT 48

On or about 4/10/15, in the County of Mahoning, and State of Ohio, one C) TERRENCE RUSHTON, aka "T," did knowingly, sell or offer to sell, heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 10 grams, but is less than 50 grams. This is in violation of Section 2925.03(A)(1)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

# FORFEITURE SPECIFICATION TO COUNT 48:

The Grand Jurors further find and specify that Defendant C) TERRANCE RUSHTON's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, to-wit: 1 Box of 9mm caliber ammunition, 1 Box of .40 caliber ammunition, 1 green body armor, 2 AK Assault Rifle magazines, 1 AR 15 magazine, 2 Boxes of 7.62 ammunition, 2 Boxes of 39mm ammunition, 2 Boxes of .223 caliber ammunition, 1 stun gun, , a Sterling Arms

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.25 caliber handgun, Serial #044199, a Masterpiece Arms, 9mm handgun, Serial #F2394, 1 SPRINT cell phone, 1 blue cell phone, 2 SAMSUNG cell phones, \$1,535.00 in U.S. Currency, 2 Debit/ Pre-paid cards, 2005 Jeep Grand Cherokee (License Plate: DFB 2338), 2006, White, Dodge Charger (License Plate: FXP 3880), pursuant to Ohio Revised Code Section 2941.1417.

# COUNT 49

On or about 04/29/15 in the County of Mahoning, and State of Ohio, Defendant C) TERRENCE RUSHTON, aka "T," did, without being relieved from disability as provided in Section 2923.14 of the Revised Code, knowingly did acquire, have, carry, or use any firearm or dangerous ordnance, to wit: a .40 caliber Smith & Wesson handgun, and knowingly has been convicted of a felony offense involving the illegal possession, use, sale, administration, distribution, or felony offense in violation of Section 2923.13(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: HAVING WEAPONS WHILE UNDER DISABILITY, constitutes a felony of the THIRD Degree.

# FORFEITURE SPECIFICATION TO COUNT 49.

The Grand Jurors further find and specify that Defendant C) TERRENCE RUSHTON's ownership, right, title, or interest in the .40 caliber Smith & Wesson handgun, Serial #MRM0081, 16 rounds of ,40 caliber ammunition and magazine shall be subject to forfeiture to the State of Ohio, possession of which by him constituting a felony offense, pursuant to Ohio Revised Code Section 2941.1417.

<u>COUNT 50</u>

On or about 04/29/15 in the County of Mahoning, and State of Ohio, Defendant C) TERRENCE RUSHTON, aka "T," did, without being relieved from disability as provided in Section 2923.14 of the Revised Code, knowingly did acquire, have, carry, or use any firearm or dangerous ordnance, to wit: a Phoenix Arms .25 caliber Pistol, and knowingly has been convicted of a felony offense involving the illegal possession, use, sale, administration, distribution, or frafficking in any drug of abuse, in violation of Section 2923.13(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: HAVING WEAPONS WHILE UNDER DISABILITY, constitutes a felony of the THIRD Degree.

# FORFEITURE SPECIFICATION TO COUNT 50.

The Grand Jurors further find and specify that Defendant C) TERRENCE RUSHTON's ownership, right, title, or interest in the Phoenix Arms, 25 caliber handgun, Serial #4278432, and magazine shall be subject to forfeiture to the State of Ohio, possession of which by him constituting a felony offense, pursuant to Ohio Revised Code Section 2941.1417.

#### COUNT 51

On or about 1/27/15 through on or about 2/26/15, in the County of Mahoning, and the State of Ohio, D) KEITH JOHNSON, aka "BEAR", did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, Schedule I controlled substance, in an amount that equals or exceeds 5 grams but is less than 10 grams in weight, in violation of Section 2925.03(A)(1)(C)(6)(d) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the THIRD Degree

### COUNT 52

On or about 2/17/15, in the County of Mahoning, and the State of Ohio, D) KEITH JOHNSON, aka "BEAR", did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, Schedule I controlled substance, in the vicinity of a juvenile, in violation of Section 2925.03(A)(1)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 53

On or about 3/11/15/15, in the County of Mahoning, and the State of Ohio, D) KEITH JOHNSON, aka "BEAR", did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, Schedule I controlled substance, in violation of Section 2925.03(A)(1)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 54

On or about 4/15/15, in the County of Mahoning, and the State of Ohio, D) KEITH JOHNSON, aka "BEAR", did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, Schedule I controlled substance, in an amount that equals or exceeds 1 gram, but is less than 5 grams, in violation of Section 2925.03(A)(1)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

### COUNT 55

On or about 4/21/15, in the County of Mahoning, and the State of Ohio, D) KEITH JOHNSON, aka "BEAR", did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, Schedule I controlled substance, , in an amount that equals or exceeds 1 gram, but is less than 5 grams, in violation of Section 2925.03(A)(1)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of

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This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

# FORFEITURE SPECIFICATION TO COUNT 55:

The Grand Jurors further find and specify that Defendant D) KEITH JOHNSON's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, towit: 2001 Teal, BMW (License Plate: GGV 9543), \$889.00 in U.S. Currency, pursuant to Ohio

Revised Code Section 2941.1417.

# COUNT 56

On or about 04/29/15 in the County of Mahoning, and State of Ohio, Defendant D) KEITH JOHNSON, aka "BEAR," did, without being relieved from disability as provided in Section 2923.14 of the Ohio Revised Code, knowingly did acquire, have, carry, or use any firearm or dangerous ordnance, to wit: a .45 caliber, Glock handgun, Model 30, Serial # PNV 892, with 19 rounds of ammunition and magazine and knowingly has been convicted of a felony offense involving the illegal possession, use, sale, administration, distribution, or trafficking in any drug of abuse, in violation of Section 2923.13(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: HAVING WEAPONS WHILE UNDER DISABILITY, constitutes a felony of the THIRD Degree.

# FORFEITURE SPECIFICATION TO COUNT 56

The Grand Jurors further find and specify that Defendant D) KEITH JOHNSON's ownership, right, title, or interest in the .45 caliber Glock handgun, Model 30, Serial # PNV 892, with 19 rounds of ammunition and magazine, shall be subject to forfeiture to the State of Ohio, possession of which by him constituting a felony offense, pursuant to Ohio Revised Code Section 2941.1417

#### COUNT 57

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On or about 10/17/14, in the County of Mahoning, and the State of Ohio, F) ASHANTI BUNCH, aka "AD", did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, Schedule I controlled substance, in violation of Section 2925.03(A)(1)(C)(6)(a) of the Ohio Revised Code and against

the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

# COUNT 58

On or about 10/21/14, in the County of Mahoning, and the State of Ohio, F) ASHANTI BUNCH, aka "AD", did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, Schedule I controlled substance, in violation of Section 2925.03(A)(1)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

# COUNT 59

On or about 10/23/14, in the County of Mahoning, and the State of Ohio, F) ASHANTI BUNCH, aka "AD", did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(1)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree. the State of Ohio.

### COUNT 60

On or about 11/13/14, in the County of Mahoning, and the State of Ohio, F) ASHANTI BUNCH, aka "AD", did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(1)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree. the State of Ohio.

# FORFEITURE SPECIFICATION TO COUNT 60:

The Grand Jurors further find and specify that Defendant F) ASHANTI BUNCH's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, towit: 1 Box of .45 caliber Winchester ammunition, 2 Black Kyocera cell phones, 1 Pink SAMSUNG cell phone, 1 Verizon SAMSUNG cell phone, 1 Black & Red Kyocera cell phone, 1 Black & Red Verizon cell phone, pursuant to Ohio Revised Code Section 2941.1417.

# COUNT 61

On or about 4/3/15, in the County of Mahoning, and State of Ohio, one F) ASHANTI BUNCH, aka "AD," did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but less than 5 grams, in violation of Section 2925.03(A)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HERION, constitutes a felony of the SECOND Degree.

# COUNT 62

On or about 4/14/15, in the County of Mahoning, and State of Ohio, one F) ASHANTI BUNCH, aka "AD," did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but less than 5 grams, in violation of Section 2925.03(A)(C)(6)(E) of the Ohio Revised Code and against the peace and dignity of the State of Ohio. This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

### COUNT 63

On or about 04/29/15, in the County of Mahoning, and State of Ohio, Defendant F) ASHANTI BUNCH, aka "AD," did, without being relieved from disability as provided in Section 2923.14 of the Revised Code, knowingly did acquire, have, carry, or use any firearm or dangerous ordnance, to wit: a Rock Island Armory .45 caliber handgun, and knowingly has been convicted of an offense involving the illegal possession, use, sale, administration, distribution, or trafficking in any drug of abuse, in violation of Section 2923.13(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: HAVING WEAPONS WHILE UNDER DISABILITY, constitutes a felony of

the THIRD Degree.

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# FORFEITURE SPECIFICATION TO COUNT 63.

The Grand Jurors further find and specify that Defendant F) ASHANTI BUNCH's ownership, right, title, or interest in the Rock Island Armory, 45 caliber hand gun, Serial #: RIA1457226 and box of .45 caliber ammunition shall be subject to forfeiture to the State of Ohio, possession

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of which by him constituting a felony offense, pursuant to Ohio Revised Code Section 2941.1417.

# COUNT 64

On or about 04/29/15, in the County of Mahoning, and State of Ohio, Defendant F) ASHANTI BUNCH, aka "AD," did, receive, retain, or dispose of property, to wit: a Rock Island Armory, .45 caliber hand gun, Serial #: RIA1457226 belonging to Steve Kwasnik, knowing, or having reasonable cause to believe that the property has been obtained through commission of a theft offense, said property being a firearm, or dangerous ordnance, as defined in section 2923.11 of the revised code, in violation of Section 2913.51(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: RECEIVING STOLEN PROPERTY, constitutes a felony of the FOURTH

Degree.

# COUNT 65

On or about 1/21/15, in the County of Mahoning, and the State of Ohio, E) HIAWATHA JOHNSON, aka "YODA," did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.03(A)(1)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

# COUNT 66

On or about 3/2//15, in the County of Mahoning, and the State of Ohio, E) HIAWATHA JOHNSON, aka "YODA," did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.03(A)(1)(C)(6)(a) of the Ohio

Revised Code and against the peace and dignity of the State of Ohio. This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 67

On or about 3/18/15, in the County of Mahoning, and the State of Ohio, E) HIAWATHA JOHNSON, aka "YODA," did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.03(A)(1)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

# FORFEITURE SPECIFICATION TO COUNT 67:

The Grand Jurors further find and specify that Defendant E) HIAWATHA JOHNSON's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, to-wit: 1 Black SAMSUNG phone, 1 White SAMSUNG phone, 1 NOKIA cell phone, 2 9mm rounds, 1 Bullet proof vest, 1 SAMSUNG DVR, pursuant to Ohio Revised Code Section 2941,1417.

#### COUNT 68

On or about 3/3/15, in the County of Mahoning, and the State of Ohio, G) RODNEY CARTER, aka "RC," did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, Schedule I controlled substance, in the vicinity of a juvenile, in violation of Section 2925.03(A)(1)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HBROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 69

On or about 3/9/15, in the County of Mahoning, and the State of Ohio, G) RODNEY CARTER, aka "RC," did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(1)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 70

On or about 4/13/15, in the County of Mahoning, and the State of Ohio, G) RODNEY CARTER, aka "RC," did knowingly did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(1)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

# FORFEITURE SPECIFICATION TO COUNT 70

The Grand Jurors further find and specify that Defendant G) RODNEY CARTER's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, towit: 2 Motorola cell phones, pursuant to Ohio Revised Code Section 2941.1417.

#### COUNT 71

On or about 03/27/15, in the County of Mahoning, and State of Ohio, H) CORBIN DETWILER did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but less than 5 grams, when H) CORBIN DETWILER knew or had reasonable cause to believe that the controlled substance is intended for resale by H) CORBIN DETWILER or another person, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

# COUNT 72

On or about 03/29/15, in the County of Mahoning, and State of Ohio, one H) CORBIN DETWILER, did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 73

On or about 04/14/15, in the County of Mahoning, and State of Ohio, one H) CORBIN DETWILER, did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 74

On or about 04/07/15, in the County of Mahoning, and State of Ohio, one I) DIEGO GONZALEZ, did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 75

On or about 04/14/15, in the County of Mahoning, and State of Ohio, one I) DIEGO GONZALEZ, did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 10 gram but less than 50 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the SECOND Degree.

#### COUNT 76

On or about 04/06/15, in the County of Mahoning, and State of Ohio, one J) JUJUAN MCKEITHEN, did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 10 gram but less than 50 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the SECOND Degree.

#### COUNT 77

On or about 03/27/15, in the County of Mahoning, and State of Ohio, one K) JEFF WESS, did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 78

On or about 03/28/15, in the County of Mahoning, and State of Ohio, one K) IEFF WESS, did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### <u>COUNT 79</u>

On or about 03/29/15, in the County of Mahoning, and State of Ohio, one K) JEFF WESS, did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 80

On or about 03/31/15, in the County of Mahoning, and State of Ohio, one K) JEFF WESS, did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 81

On or about 4/4/15, in the County of Mahoning, and State of Ohio, one L) KELVIN CRENSHAW did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 10 grams, but less than 50 grams, in violation of Section 2925.11(A)(C)(6)(d) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the SECOND Degree.

# FORFEITURE SPECIFICATION TO COUNT 81:

The Grand Jurors further find and specify that Defendant L) KELVIN CRENSHAW 's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, to-wit: 2001 Teal, BMW (License Plate: GGV 9543), pursuant to Ohio Revised Code Section 2941.1417.

#### COUNT 82

On or about 6/13/14, in the County of Mahoning, and the State of Ohio, M) CHARLES FROHMAN, did knowingly sell or offer to sell a controlled substance, Oxycodone/Roxicodone, a compound, mixture, preparation, or substance included in Schedule II, in an amount that is less than the bulk amount, in violation of Section 2925.03(A)(1)(C)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: AGGRAVATED TRAFFICKING IN DRUGS, constitutes a felony of the FOURTH Degree.

#### COUNT 83

On or about 6/25/14, in the County of Mahoning, and the State of Ohio, M) CHARLES FROHMAN, did knowingly sell or offer to sell a controlled substance, Oxycodone, a compound, mixture, preparation, or substance included in Schedule II, in an amount that is less than the bulk amount, in violation of Section 2925.03(A)(1)(C)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: AGGRAVATED TRAFFICKING IN DRUGS, constitutes a felony of the FOURTH Degree.

### COUNT 84

On or about 7/9/14, in the County of Mahoning, and the State of Ohio, M) CHARLES FROHMAN, did knowingly sell or offer to sell a controlled substance, <u>Oxycodone</u>, a compound, mixture, preparation, or substance included in Schedule II, the amount of drug involved equals or exceeds the bulk amount but is less than five times the bulk amount, in violation of Section 2925.03(A)(1)(C)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: AGGRAVATED TRAFFICKING IN DRUGS, constitutes a felony of the THIRD Degree.

#### COUNT 85

On or about 2/20/15, in the County of Mahoning, and State of Ohio, M) CHARLES FROHMAN, did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, <u>Heroin</u>, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal ro or exceeding 1 gram but less than 5 grams, when TERRENCE RUSHTON, aka "T," and M) CHARLES FROHMAN knew or had reasonable cause to believe that the controlled substance is intended for resale by M) CHARLES FROHMAN, or another person, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

### COUNT 86

On or about 2/20/15, in the County of Mahoning, and State of Ohio, one M) CHARLES FROHMAN, did knowingly obtain, possess, or use a drug, Alprazolam/Xanax, a compound, mixture, preparation, or substance included in Schedule IV, the amount of drug is less than the bulk amount, and the offender has been previously convicted of a drug abuse offense in violation of Section 2925.11(A)(C)(2)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

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This act, to wit: AGGRAVATED POSSESSION OF DRUGS, constitutes a felony of the FIFTH degree.

#### COUNT 87

On or about 2/21/15, in the County of Mahoning, and State of Ohio, one M) CHARLES FROHMAN did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 88

On or about 2/22/15, in the County of Mahoning, and State of Ohio, one M) CHARLES FROHMAN did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 89

On or about 3/1/15, in the County of Mahoning, and State of Ohio, M) CHARLES FROHMAN, did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, when TERRENCE RUSHTON, aka "T," and M) CHARLES FROHMAN knew or had reasonable cause to believe that the controlled substance is intended for resale by M) CHARLES FROHMAN, or another person, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 90

On or about 3/11/15, in the County of Mahoning, and State of Ohio, one M) CHARLES FROHMAN did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

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#### **COUNT 91**

On or about 3/13/15, in the County of Mahoning, and State of Ohio, M) CHARLES FROHMAN, did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, when TERRENCE RUSHTON, aka "T," and M) CHARLES FROHMAN knew or had reasonable cause to believe that the controlled substance is intended for resale by M) CHARLES FROHMAN, or another person, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 92

On or about 3/16/15, in the County of Mahoning, and State of Ohio, one M) CHARLES FROHMAN did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### <u>COUNT 93</u>

On or about 3/16/15, in the County of Mahoning, and State of Ohio, one M) CHARLES FROHMAN did knowingly obtain, possess, or use a drug, Cocaine, a Schedule HH controlled substance, in violation of Section 2925.11(A)(C)(4)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF COCAINE, constitutes a felony of the FIFTH Degree.

#### COUNT 94

On or about 3/20/15, in the County of Mahoning, and State of Ohio, one M) CHARLES FROHMAN did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 95
On or about 3/21/15, in the County of Mahoning, and State of Ohio, one M) CHARLES FROHMAN did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 96

On or about 3/21/15, in the County of Mahoning, and State of Ohio, one M) CHARLES FROHMAN did knowingly obtain, possess, or use a drug, Cocaine, a Schedule HH controlled substance, in violation of Section 2925.11(A)(C)(4)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF COCAINE, constitutes a felony of the FIFTH Degree.

### COUNT 97

On or about 3/30/15, in the County of Mahoning, and State of Ohio, one N) TREVON HOWELL did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 98

On or about 4/1/15, in the County of Mahoning, and State of Ohio, N) TREVON HOWELL did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when N) TREVON HOWELL and TERRENCE RUSHTON, aka "T," knew or had reasonable cause to believe that the controlled substance is intended for resale by N) TREVON HOWELL or another person, in violation of Section 2925.03(A)(2)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

### <u>COUNT 99</u>

On or about 4/19/15, in the County of Mahoning, and State of Ohio, N) TREVON HOWELL did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when N) TREVON HOWELL and C) TERRENCE RUSHTON, aka "T," knew or had reasonable cause to believe that the controlled substance is intended for resale by C) TERRENCE RUSHTON, aka "T," or another person, in an amount that equals or exceeds 5

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grams, but less than 10 grams, in violation of Section 2925.03(A)(2)(C)(6)(d) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the THIRD Degree.

### COUNT 100

On or about 4/20/15, in the County of Mahoning, and State of Ohio, N) TREVON HOWELL did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when N) TREVON HOWELL and TERRENCE RUSHTON, aka "T," knew or had reasonable cause to believe that the controlled substance is intended for resale by C) TERRENCE RUSHTON, aka "T," or another person, in an amount that equals or exceeds 5 grams, but less than 10 grams, in violation of Section 2925.03(A)(2)(C)(6)(d) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the THIRD Degree.

### COUNT 101

On or about 4/5/15, in the County of Mahoning, and State of Ohio, one O) MARQUIS HUFFMAN did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### **COUNT 102**

On or about 03/24/15, in the County of Mahoning, and State of Ohio, P) SAMUEL A. RICHARD, aka "LOUD," did knowing cause or attempt to causer physical harm to Tamara Fredericks by means of a deadly weapon or dangerous ordinance, to wit a hand gun, in violation of Section 2903.11(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: FELONIOUS ASSAULT, constitutes a felony of the SECOND Degree.

## SPECIFICATION 1 TO COUNT 102

The Grand Jurors further find and specify that P) SAMUEL A. RICHARD, aka, "LOUD" had a firearm on or about his person or under his control while committing the offense and used it to facilitate the offense, in violation of Section 2941.145 of the Ohio Revised Code, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

## SPECIFICATION 2 TO COUNT 102

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The Grand Jurors further find and specify that P) SAMUEL A. RICHARD, aka "LOUD" committed said FELONIOUS ASSAULT by discharging a firearm, as defined in Section 2923.11, from a motor vehicle other than a manufactured home, as defined in Section 4501.01, in violation of Section 2941.146 of the Ohio Revised Code, 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 103

On or about 03/24/15, in the County of Mahoning, and State of Ohio, P) SAMUEL A. RICHARD, aka "LOUD," without being relieved from disability as provided in Section 2923.14 of the Revised Code, knowingly did acquire, have, carry, or use any firearm or dangerous ordnance, to wit: a handgun, and knowingly has been adjudicated a delinquent child for the commission of an offense, that, if committed by an adult, would have been a felony offense of violence, in violation of Section 2923.13(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: HAVING WEAPONS WHILE UNDER DISABILITY, constitutes a felony of the THIRD Degree.

#### **COUNT 104**

On or about 03/24/15, in the County of Mahoning, and State of Ohio, P) SAMUEL A. RICHARD, aka "LOUD," without being relieved from disability as provided in Section 2923.14 of the Revised Code, knowingly did acquire, have, carry, or use any firearm or dangerous ordnance, to wit: a handgun, and knowingly was convicted of a felony offense involving the illegal possession, use, sale, administration, distribution, or trafficking in any drug of abuse, in violation of Section 2923.13(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: HAVING WEAPONS WHILE UNDER DISABILITY, constitutes a felony of the THIRD Degree.

#### **COUNT 105**

On or about 03/24/15, in the County of Mahoning, and State of Ohio, P) SAMUEL A. RICHARD, aka "LOUD," did knowingly discharge a firearm while in or on a motor vehicle, in violation of Section 2923.16(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: IMPROPERLY HANDLING FIREARMS IN A MOTOR VEHICLE, constitutes a felony of the FOURTH Degree.

#### **COUNT 106**

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On or about 3/23/15, in the County of Mahoning, and State of Ohio, Q) BRANDON WILLIAMS, did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 10 grams but less than 50 grams, when Q) BRANDON WILLIAMS knew or had reasonable cause to believe that the controlled substance is intended for resale by Q) BRANDON WILLIAMS, C) TERRENCE RUSHTON, aka "T," or another person, in violation of Section 2925.03(A)(2)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

#### COUNT 107

On or about 3/24/15, in the County of Mahoning, and State of Ohio, Q) BRANDON WILLIAMS, did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 10 grams but less than 50 grams, when Q) BRANDON WILLIAMS knew or had reasonable cause to believe that the controlled substance is intended for resale by Q) BRANDON WILLIAMS, C) TERRENCE RUSHTON, aka "T," or another person, in violation of Section 2925.03(A)(2)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

### **COUNT 108**

On or about 3/28/15, in the County of Mahoning, and State of Ohio, Q) BRANDON WILLIAMS, did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 10 grams but less than 50 grams, when Q) BRANDON WILLIAMS knew or had reasonable cause to believe that the controlled substance is intended for resale by Q) BRANDON WILLIAMS, C) TERRENCE RUSHTON, aka "T," or another person, in violation of Section 2925.03(A)(2)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

#### **COUNT 109**

On or about 3/31/15, in the County of Mahoning, and State of Ohio, Q) BRANDON WILLIAMS, did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 10 grams but less than 50 grams, when Q) BRANDON WILLIAMS knew or had reasonable cause to believe that the controlled substance is intended for resale by Q) BRANDON WILLIAMS, C) TERRENCE RUSHTON, aka "T," or another person, in violation of Section 2925.03(A)(2)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

#### COUNT 110

On or about 4/5/15, in the County of Mahoning, and State of Ohio, Q) BRANDON WILLIAMS, did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 10 grams but less than 50 grams, when Q) BRANDON WILLIAMS knew or had reasonable cause to believe that the controlled substance is intended for resale by Q) BRANDON WILLIAMS, C) TERRENCE RUSHTON, aka "T," or another person, in violation of Section 2925.03(A)(2)(C)(6)(e) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the SECOND Degree.

#### **COUNT 111**

On or about 4/16/15, in the County of Mahoning, and State of Ohio, Q) BRANDON WILLIAMS, did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 5 grams but less than 10 grams, when Q) BRANDON WILLIAMS knew or had reasonable cause to believe that the controlled substance is intended for resale by Q) BRANDON WILLIAMS, C) TERRENCE RUSHTON, aka "T," or another person, in violation of Section 2925.03(A)(2)(C)(6)(d) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the THIRD Degree.

#### COUNT 112

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On or about 4/25/15, in the County of Mahoning, and State of Ohio, Q) BRANDON WILLIAMS, did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, when Q) BRANDON WILLIAMS knew or had reasonable cause to believe that the controlled substance is intended for resale by Q) BRANDON WILLIAMS, C) TERRENCE RUSHTON, aka "T," or another person, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

### **COUNT 113**

On or about 2/21/15, in the County of Mahoning, and State of Ohio, one R) SHENIKA RUSHTON, aka "NIKA," did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 114

On or about 2/28/15, in the County of Mahoning, and the State of Ohio, R) SHENIKA RUSHTON, aka "NIKA," did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 grams but is less than 5 grams in weight, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

### COUNT 115

On or about 3/1/15, in the County of Mahoning, and the State of Ohio, R) SHENIKA RUSHTON, aka "NIKA," did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 grams but is less than 5 grams in weight, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

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This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

# COUNT 116

On or about 3/19/15, in the County of Mahoning, and the State of Ohio, R) SHENIKA RUSHTON, aka "NIKA," did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.03(A)(2)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

## COUNT 117

On or about 3/20/15, in the County of Mahoning, and the State of Ohio, R) SHENIKA RUSHTON, aka "NIKA," did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 grams but is less than 5 grams in weight, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and

dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

## **COUNT 118**

On or about 3/26/15, in the County of Mahoning, and the State of Ohio, R) SHENIKA RUSHTON, aka "NIKA," did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.03(A)(2)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

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## COUNT 119

On or about 4/7/15, in the County of Mahoning, and the State of Ohio, R) SHENIKA RUSHTON, aka "NIKA," did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule 1 controlled substance, in an amount that equals or exceeds 1 gram but is less than 5 grams, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of

the State of Ohio. This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

FORFEITURE SPECIFICATION TO COUNT 119:

The Grand Jurors further find and specify that Defendant R) SHENIKA RUSHTON's ownership, right, title, or interest in the following items shall be subject to forfeiture to the State of Ohio, the property having been obtained through the commission of illegal felony drug abuse activity, to-wit: 1 Phoenix Arms .25 caliber handgun, Serial #4278432, 1.40 caliber Smith & Wesson handgun, Serial #MRM0087, 16 rounds of .40 caliber ammunition, 1.40 caliber ammunition magazine, 1 Box of 9mm caliber ammunition, 1 Box of .40 caliber ammunition, 1 green body armor, 2 AK Assault Rifle magazines, 1 AR 15 magazine, 2 Boxes of 7.62 ammunition, 2 Boxes of 39mm ammunition, 2 Boxes of .223 caliber ammunition, 1 stun gun, 1 SPRINT cell phone, 1 blue cell phone, 2 SAMSUNG cell phones, \$1,535.00 in U.S. Currency, 2 Debit/ Pre-paid cards, 2005 Jeep Grand Cherokee (License Plate: DFB 2338), 2006, White, Dodge Charger (License Plate: FXP 3880) pursuant to Ohio Revised Code Section 2941.1417.

### COUNT 120

On or about 4/23/15, R) SHENIKA RUSHTON, aka "NIKA" and C) TERRENCE RUSHTON, aka "T," did conduct or attempt to conduct a transaction knowing that the property involved in the transaction is the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity, or with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, in violation of Section 1315.55(A)(1/3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: MONEY LAUNDERING, constitutes a felony of the THIRD DEGREE .

### <u>COUNT 121</u>

On or about 01/21/15, in the County of Mahoning, and State of Ohio, S) KIA BROWN, did knowingly sell or offer to sell a controlled substance, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.03(A)(1)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 122

On or about 3/19/15, in the County of Mahoning, and State of Ohio, one T) ALBERT SANTIAGO did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

On or about 3/20/15, in the County of Mahoning, and State of Ohio, one T) ALBERT SANTIAGO did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and diguity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### **COUNT 124**

On or about 3/24/15, in the County of Mahoning, and State of Ohio, one T) ALBERT SANTIAGO did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 125

On or about 2/21/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 126

On or about 2/28/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### <u>COUNT 127</u>

On or about 3/2/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

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This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

## COUNT 128

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On or about 3/3/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of

Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree. **COUNT 129** 

On or about 3/4/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

## COUNT 130

On or about 3/7/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 131

On or about 3/12/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

## COUNT 132

On or about 3/13/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section

2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 133

On or about 3/14/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree. Ohio:

### **COUNT 134**

On or about 3/16/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of

Ohio.

This set, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 135

On or about 3/17/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of

Ohio.

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This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

## COUNT 136

On or about 3/18/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

### COUNT\_137

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On or about 3/19/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 138

On or about 3/20/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### <u>COUNT 139</u>

On or about 3/21/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 140

On or about 3/22/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 141

On or about 3/23/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

On or about 3/24/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 143

On or about 3/25/15, in the County of Mahoning, and State of Ohio, one U) RANDY COX did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### **COUNT 144**

On or about 3/01/15, in the County of Mahoning, and State of Ohio, one V) JASON CURRIE did knowingly obtain, possess, or use a drue. Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

### COUNT 145

On or about 3/08/15, in the County of Mahoning, and State of Ohio, one V) JASON CURRIE did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### **COUNT 146**

On or about 3/09/15, in the County of Mahoning, and State of Ohio, one V) JASON CURRIE did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

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This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### **COUNT 147**

On or about 2/27/15, in the County of Mahoning, and State of Ohio, W) KIM DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 148

On or about 3/2/15, in the County of Mahoning, and State of Ohio, W) KIM DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but is less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 149

On or about 3/3/15, in the County of Mahoning, and State of Ohio, W) KIM DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but is less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

### **COUNT 150**

On or about 3/11/15, in the County of Mahoning, and State of Ohio, W) KIM DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but is less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 151

On or about 3/13/15, in the County of Mahoning, and State of Ohio, W) KIM DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but is less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### **COUNT 152**

On or about 3/14/15, in the County of Mahoning, and State of Ohio, W) KIM DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 153

On or about 3/19/15, in the County of Mahoning, and State of Ohio, W) KIM DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 154

On or about 3/22/15, in the County of Mahoning, and State of Ohio, W) KIM DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 155

On or about 3/25/15, in the County of Mahoning, and State of Ohio, W) KIM DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but is less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

On or about 2/20/15, in the County of Mahoning, and State of Ohio, one X) NICK DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### <u>COUNT 157</u>

On or about 2/26/15, in the County of Mahoning, and State of Ohio, X) NICK DAVIS and GG) MICHAEL SHUGART did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 158

On or about 2/26/15, in the County of Mahoning, and State of Ohio, X) NICK DAVIS and GG) MICHAEL SHUGART did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when TERRENCE RUSHTON, aka "T" and X) NICK DAVIS knew or had reasonable cause to believe that the controlled substance is intended for resale by X) NICK DAVIS or another person, in violation of Section 2925.03(A)(2)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 159

On or about 2/27/15, in the County of Mahoning, and State of Ohio, one X) NICK DAVIS and GG) MICHAEL SHUGART did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 160

On or about 2/28/15, in the County of Mahoning, and State of Ohio, one X) NICK DAVIS and GG) MICHAEL SHUGART did knowingly obtain, possess, or use a drug, Heroin, or any

compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 161

On or about 3/2/15, in the County of Mahoning, and State of Ohio, one X) NICK DAVIS and GG) MICHAEL SHUGART did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### **COUNT 162**

On or about 3/3/15, in the County of Mahoning, and State of Ohio, one X) NICK DAVIS and GG) MICHAEL SHUGART did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 163

On or about 3/11/15, in the County of Mahoning, and State of Ohio, one X) NICK DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### **COUNT 164**

On or about 3/12/15, in the County of Mahoning, and State of Ohio, one X) NICK DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 165

On or about 3/14/15, in the County of Mahoning, and State of Ohio, one X) NICK DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 166

On or about 3/15/15, in the County of Mahoning, and State of Ohio, one X) NICK DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 167

On or about 3/16/15, in the County of Mahoning, and State of Ohio, X) NICK DAVIS and GG) MICHAEL SHUGART did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 168

On or about 3/18/15, in the County of Mahoning, and State of Ohio, one X) NICK DAVIS did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 169

On or about 2/24/15, in the County of Mahoning, and State of Ohio, one Y) NATALIE HABIB, aka "NATALIE GOOD," did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

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This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### **COUNT 170**

On or about 2/26/15, in the County of Mahoning, and State of Ohio, one Y) NATALIE HABIB, aka "NATALIE GOOD," did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 171

On or about 3/1/15, in the County of Mahoning, and State of Ohio, one Z) KATIE GRIST did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### <u>COUNT 172</u>

On or about 3/2/15, in the County of Mahoning, and State of Ohio, one Z) KATIE GRIST did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

## COUNT 173

On or about 3/3/15, in the County of Mahoning, and State of Ohio, one Z) KATIE GRIST did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT <u>174</u>

On or about 3/4/15, in the County of Mahoning, and State of Ohio, Z) KATIE GRIST did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but is less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 175

On or about 3/14/15, in the County of Mahoning, and State of Ohio, one Z) KATIE GRIST did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 176

On or about 3/15/15, in the County of Mahoning, and State of Ohio, one Z) KATIE GRIST did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 177

On or about 3/16/15, in the County of Mahoning, and State of Ohio, one Z) KATIE GRIST did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

## COUNT 178

On or about 3/18/15, in the County of Mahoning, and State of Ohio, one Z) KATIE GRIST did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

On or about 3/19/15, in the County of Mahoning, and State of Ohio, Z) KATIE GRIST did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but is less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

### COUNT 180

On or about 3/20/15, in the County of Mahoning, and State of Ohio, one Z) KATIE GRIST did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

## COUNT 181

On or about 3/21/15, in the County of Mahoning, and State of Ohio, one Z) KATIE GRIST did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 182

On or about 3/23/15, in the County of Mahoning, and State of Ohio, Z) KATIE GRIST did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but is less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 183

On or about 3/24/15, in the County of Mahoning, and State of Ohio, Z) KATIE GRIST did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount that equals or exceeds 1 gram but is less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

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This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

### **COUNT 184**

On or about 3/25/15, in the County of Mahoning, and State of Ohio, one Z) KATIE GRIST did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, , constitutes a felony of the FIFTH Degree.

### **COUNT 185**

On or about 3/25/15, in the County of Mahoning, and State of Ohio, AA) LUCAS HANSHAW. and Y) NATALIE HABIB, aka "NATALIE GOOD," did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### **COUNT 186**

On or about 2/20/15, in the County of Mahoning, and State of Ohio, one BB) DARLA HARRISON did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

### **COUNT 187**

On or about 2/21/15, in the County of Mahoning, and State of Ohio, one BB) DARLA HARRISON did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### **COUNT 188**

On or about 3/12/15, in the County of Mahoning, and State of Ohio, one BB) DARLA HARRISON did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount

equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

### COUNT 189

On or about 3/12/15, in the County of Mahoning, and the State of Ohio, BB) DARLA HARRISON, did knowingly sell or offer to sell a controlled substance, Tramadol, a compound, mixture, preparation, or substance included in Schedule IV, the amount of drug is less than the bulk amount, in violation of Section 2925.03(A)(C)(2)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: AGGRAVATED TRAFFICKING IN DRUGS, constitutes a felony of the FIFTH Degree.

#### COUNT 190

On or about 3/13/15, in the County of Mahoning, and State of Ohio, one BB) DARLA HARRISON did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

### COUNT 191

On or about 3/14/15, in the County of Mahoning, and State of Ohio, one BB) DARLA HARRISON did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 192

On or about 3/15/15, in the County of Mahoning, and State of Ohio, one BB) DARLA HARRISON did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### <u>COUNT 193</u>

On or about 3/16/15, in the County of Mahoning, and State of Ohio, one BB) DARLA HARRISON did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### <u>COUNT 194</u>

On or about 3/17/15, in the County of Mahoning, and State of Ohio, one BB) DARLA HARRISON did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### **COUNT 195**

On or about 3/18/15, in the County of Mahoning, and State of Ohio, one BB) DARLA HARRISON did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### **COUNT 196**

On or about 3/21/15, in the County of Mahoning, and State of Ohio, one BB) DARLA HARRISON did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### **COUNT 197**

On or about 3/22/15, in the County of Mahoning, and State of Ohio, one BB) DARLA HARRISON did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### **COUNT 198**

On or about 2/19/15, in the County of Mahoning, and State of Ohio, one CC) STEPHANIE MOREHEAD did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### <u>COUNT 199</u>

On or about 2/26/15, in the County of Mahoning; and State of Ohio, one CC) STEPHANIE MOREHEAD did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### **COUNT 200**

On or about 2/27/15, in the County of Mahoning, and State of Ohio, one CC) STEPHANIE MOREHEAD did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### **COUNT 201**

On or about 2/28/15, in the County of Mahoning, and State of Ohio, one CC) STEPHANIE MOREHEAD did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 202

On or about 3/3/15; in the County of Mahoning, and State of Ohio, one CC) STEPHANIE MOREHEAD did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of

Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### **COUNT 203**

On or about 3/12/15, in the County of Mahoning, and State of Ohio, one CC) STEPHANIE MOREHEAD did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

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### COUNT 204

On or about 3/14/15, in the County of Mahoning, and State of Ohio, one CC) STEPHANIE MOREHEAD did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 205

On or about 3/19/15, in the County of Mahoning, and State of Ohio, one CC) STEPHANIE MOREHEAD did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 206

On or about 2/19/15, in the County of Mahoning, and State of Ohio, one DD) DOMINIC PELLIGRINI did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

On or about 2/20/15, in the County of Mahoning, and State of Ohio, one DD) DOMINIC PELLIGRINI did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

## COUNT 208

On or about 3/8/15, in the County of Mahoning, and State of Ohio, one DD) DOMINIC PELLIGRINI did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### **COUNT 209**

On or about 3/14/15, in the County of Mahoning, and State of Ohio, one DD) DOMINIC PELLIGRINI did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 210 .

On or about 3/15/15, in the County of Mahoning, and State of Ohio, one DD) DOMINIC PELLIGRINI did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

### COUNT 211

On or about 3/16/15, in the County of Mahoning, and State of Ohio, one DD) DOMINIC PELLIGRINI did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

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# This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 212

On or about 3/20/15, in the County of Mahoning, and State of Ohio, one DD) DOMINIC PELLIGRINI did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 213

On or about 2/23/15, in the County of Mahoning, and the State of Ohio, EE) MARK PIROCH, did knowingly sell or offer to sell a controlled substance, Oxycodone/Acetaminophen, a compound, mixture, preparation, or substance included in Schedule II, in an amount that is less than the bulk amount, in violation of Section 2925.03(A)(1)(C)(1)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: AGGRAVATED TRAFFICKING IN DRUGS, constitutes a felony of the FOURTH Degree.

### COUNT 214

On or about 3/2/15, in the County of Mahoning, and State of Ohio, EE) MARK PIROCH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 215

On or about 3/8/15, in the County of Mahoning, and State of Ohio, EE) MARK PIROCH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 216

On or about 3/17/15, in the County of Mahoning, and State of Ohio, EE) MARK PIROCH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 217

On or about 3/18/15, in the County of Mahoning, and State of Ohio, EE) MARK PIROCH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### **COUNT 218**

On or about 3/2/15, in the County of Mahoning, and State of Ohio, one FF) ALANA REESE did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 219

On or about 3/14/15, in the County of Mahoning, and State of Ohio, one FF) ALANA REESE did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 220

On or about 3/4/15, in the County of Mahoning, and State of Ohio, one GG) MICHAEL SHUGART did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### <u>COUNT 221</u>

On or about 3/10/15, in the County of Mahoning, and State of Ohio, one GG) MICHAEL SHUGART did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 222

On or about 2/19/15, in the County of Mahoning, and State of Ohio, HH) HEIDI SMITH did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when TERRENCE RUSHTON, aka "T," and HH) HEIDI SMITH knew or had reasonable cause to believe that the controlled substance is intended for resale by HH) HEIDI SMITH or another person, ; in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

### <u>COUNT 223</u>

On or about 2/20/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Alprazolam/Xanax, a compound, mixture, preparation, or substance included in Schedule IV, the amount of drug is less than the bulk amount, in violation of Section 2925.11(A)(C)(2)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: AGGRAVATED POSSESSION OF DRUGS, constitutes a Misdemeanor of the FIRST degree.

#### **COUNT 224**

On or about 2/26/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

On or about 2/27/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 226

On or about 2/28/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

### <u>COUNT 227</u>

On or about 3/1/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 228

On or about 3/3/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

### COUNT 229

On or about 3/4/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section

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2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### COUNT 230

On or about 3/12/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 231

On or about 3/13/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree. a the second second

### COUNT 232

On or about 3/15/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

### COUNT 233

On or about 3/17/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

On or about 3/18/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### <u>COUNT 235</u>

On or about 3/19/15, in the County of Mahoning, and State of Ohio, HH) HEIDI SMITH did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when C) TERRENCE RUSHTON, aka "T," and HH) HEIDI SMITH knew or had reasonable cause to believe that the controlled substance is intended for resale by HH) HEIDI SMITH or another person, , in violation of Section 2925.03(A)(2)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 236

On or about 3/20/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram, but is less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

### COUNT 237

On or about 3/20/15, in the County of Mahoning, and the State of Ohio, HH) HEIDI SMITH did knowingly sell or offer to sell a controlled substance, Suboxone, a compound, mixture, preparation, or substance included in Schedule III, the amount of drug is less than the bulk amount, in violation of Section 2925.03(A)(C)(2)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: AGGRAVATED TRAFFICKING IN DRUGS, constitutes a felony of the FIFTH Degree.

On or about 3/20/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Alprazolam/Xanax, a compound, mixture, preparation, or substance included in Schedule IV, the amount of drug is less than the bulk amount, in violation of Section 2925.11(A)(C)(2)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: AGGRAVATED POSSESSION OF DRUGS, constitutes a Misdemeanor of the FIRST degree.

### **COUNT 239**

On or about 3/21/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

#### **COUNT 240**

On or about 3/21/15, in the County of Mahoning, and State of Ohio, HH) HEIDI SMITH did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a controlled substance, Hydrocodone, a Schedule III controlled substance, when TERRENCE RUSHTON, aka "T," and HH) HEIDI SMITH knew or had reasonable cause to believe that the controlled substance is intended for resale by HH) HEIDI SMITH or another person, in violation of Section 2925.03(A)(2)(C)(2)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: AGGRAVATED TRAFFICKING IN DRUGS, constitutes a felony of the FIFTH Degree.

#### **COUNT 241**

On or about 3/22/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

On or about 3/24/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### <u>COUNT 243</u>

On or about 3/25/15, in the County of Mahoning, and State of Ohio, one HH) HEIDI SMITH did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.11(A)(C)(6)(b) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FOURTH Degree.

### **COUNT 244**

On or about 3/16/15, in the County of Mahoning, and State of Ohio, one II) MATTHEW TREHARN did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 245

On or about 3/18/15, in the County of Mahoning, and State of Ohio, one II) MATTHEW TREHARN did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 246

On or about 3/25/15, in the County of Mahoning, and State of Ohio, one II) MATTHEW TREHARN did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

### **COUNT 247**

On or about 2/20/15, in the County of Mahoning, and State of Ohio, JJ) JAMES VESPASIAN and C) TERRENCE RUSHTON, aka "T," did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when C) TERRENCE RUSHTON, aka "T," and JJ) JAMES VESPASIAN knew or had reasonable cause to believe that the controlled substance is intended for resale by JJ) JAMES VESPASIAN or another person, in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN constitutes a felony of the FOURTH Degree.

### COUNT 248

On or about 2/21/15, in the County of Mahoning, and State of Ohio, JJ) JAMES VESPASIAN did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when C) TERRENCE RUSHTON, aka "T," and JJ) JAMES VESPASIAN knew or had reasonable cause to believe that the controlled substance is intended for resale by JJ) JAMES VESPASIAN or another person, , in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 249

On or about 2/26/15, in the County of Mahoning, and State of Ohio, one JJ) JAMES VESPASIAN did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### **COUNT 250**

On or about 2/27/15, in the County of Mahoning, and State of Ohio, JJ) JAMES VESPASIAN did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when C) TERRENCE RUSHTON, aka "T," and JJ) JAMES VESPASIAN knew or had reasonable cause to believe that the controlled substance is intended for resale by JJ) JAMES VESPASIAN or another person, , in an amount equal to or exceeding 1

gram but less than 5 grams, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 251

On or about 2/28/15, in the County of Mahoning, and State of Ohio, JJ) JAMES VESPASIAN did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when C) TERRENCE RUSHTON, aka "T," and JJ) JAMES VESPASIAN knew or had reasonable cause to believe that the controlled substance is intended for resale by JJ) JAMES VESPASIAN or another person, , in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

#### **COUNT 252**

On or about 3/1/15, in the County of Mahoning, and State of Ohio, JJ) JAMES VESPASIAN did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when C) TERRENCE RUSHTON, aka "T," and JJ) JAMES VESPASIAN knew or had reasonable cause to believe that the controlled substance is intended for resale by JJ) JAMES VESPASIAN or another person, , in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

#### **COUNT 253**

On or about 3/2/15, in the County of Mahoning, and State of Ohio, JJ) JAMES VESPASIAN did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when C) TERRENCE RUSHTON, aka "T," and JJ) JAMES VESPASIAN knew or had reasonable cause to believe that the controlled substance is intended for resale by JJ) JAMES VESPASIAN or another person, , in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

On or about 3/3/15, in the County of Mahoning, and State of Ohio, JJ) JAMES VESPASIAN did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when C) TERRENCE RUSHTON, aka "T," and JJ) JAMES VESPASIAN knew or had reasonable cause to believe that the controlled substance is intended for resale by JJ) JAMES VESPASIAN or another person, , in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 255

On or about 3/4/15, in the County of Mahoning, and State of Ohio, JJ) JAMES VESPASIAN did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when C) TERRENCE RUSHTON, aka "T," and JJ) JAMES VESPASIAN knew or had reasonable cause to believe that the controlled substance is intended for resale by JJ) JAMES VESPASIAN or another person, , in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 256

On or about 3/5/15, in the County of Mahoning, and State of Ohio, one JJ) JAMES VESPASIAN did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 257

On or about 3/6/15, in the County of Mahoning, and State of Ohio, JJ) JAMES VESPASIAN did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when C) TERRENCE RUSHTON, aka "T," and JJ) JAMES VESPASIAN knew or had reasonable cause to believe that the controlled substance is intended for resale by JJ) JAMES VESPASIAN or another person, , in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio. This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 258

On or about 3/7/15, in the County of Mahoning, and State of Ohio, JJ) JAMES VESPASIAN did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when C) TERRENCE RUSHTON, aka "T," and JJ) JAMES VESPASIAN knew or had reasonable cause to believe that the controlled substance is intended for resale by JJ) JAMES VESPASIAN or another person, , in an amount equal to or exceeding 1 gram but less than 5 grams, in violation of Section 2925.03(A)(2)(C)(6)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FOURTH Degree.

#### COUNT 259

On or about 3/9/15, in the County of Mahoning, and State of Ohio, JJ) JAMES VESPASIAN did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, when C) TERRENCE RUSHTON, aka "T," and JJ) JAMES VESPASIAN knew or had reasonable cause to believe that the controlled substance is intended for resale by JJ) JAMES VESPASIAN or another person, in violation of Section 2925.03(A)(2)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: TRAFFICKING IN HEROIN, constitutes a felony of the FIFTH Degree.

#### COUNT 260

On or about 3/4/15, in the County of Mahoning, and State of Ohio, one KK) JOE ZIMMERMAN did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### **COUNT 261**

On or about 3/17/15, in the County of Mahoning, and State of Ohio, one KK) JOE ZIMMERMAN did knowingly obtain, possess, or use a drug, Heroin, or any compound, mixture, preparation, or substance containing heroin, a Schedule I controlled substance, in violation of Section 2925.11(A)(C)(6)(a) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

This act, to wit: POSSESSION OF HEROIN, constitutes a felony of the FIFTH Degree.

#### NOTICE

You are advised that you are under indictment for a charge that places you under a disability and prohibits you from acquiring, having, carrying or using any firearm or dangerous ordnance during the pendency of this case OR upon conviction of this or lesser included offense. Should you do so, you can be charged with having weapon under disability pursuant to Ohio Revised Code Secion 2923.13, a felony of the THIRD Degree.

ENDORSED A TRUE BILL:

RESPECTFULLY SUBMITTED:

PAUL J. GAINS Mahoning County?Prosecutor

BY

Margaret B. Tomaro, 0074080 Michael Cody, 0080976 Special Assistant Prosecuting Attorneys Ohio Attorney General Special Prosecutions 615 W. Superior Ave. 11th Floor Cleveland, Ohio 44113 (216) 777-8044