

THE STATE OF OHIO, HAMILTON COUNTY

COURT OF COMMON PLEAS

STATE OF OHIO

Plaintiff

Case No. B 1404725

-vs-

WILLIAM MODAFARI AKA WILLIAM
MONTUANO

Defendant

PROSECUTING ATTORNEY'S REQUEST

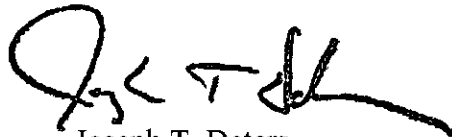
FOR ISSUANCE OF WARRANT

UPON INDICTMENT

TO THE CLERK OF THE COURT OF COMMON PLEAS:

WILLIAM MODAFARI AKA WILLIAM MONTUANO has been named a defendant in an indictment returned by the Grand Jury.

Pursuant to Rule 9, Ohio Rules of Criminal Procedure, the undersigned requests that you or a Deputy Clerk forthwith issue a warrant to an appropriate officer and direct him to execute it upon the above-named defendant at the following address: Hamilton County Justice Center, or at any place within this State.



Joseph T. Deters
Prosecuting Attorney
Hamilton County, Ohio

By: _____

Special Prosecuting Attorney

Jesse B. Kranig

Senior Assistant Attorney General

Office Of The Ohio Attorney General

441 Vine Street

Cincinnati, Ohio 45202

(513)852-1520



D107570216

THE STATE OF OHIO, HAMILTON COUNTY

COURT OF COMMON PLEAS

THE STATE OF OHIO

Case No. B 1404725

HAMILTON COUNTY, ss:

INDICTMENT FOR:

- CT1: Theft From Elderly Person or Disabled
Adult 2913.02(A)(2)[F4]
- CT2: Theft From Elderly Person or Disabled
Adult 2913.02(A)(3)[F4]
- CT3: Theft From Elderly Person or Disabled
Adult 2913.02(A)(2)[F5]
- CT4: Theft From Elderly Person or Disabled
Adult 2913.02(A)(3)[F5]
- CT5: Theft From Elderly Person or Disabled
Adult 2913.02(A)(2)[F4]
- CT6: Theft From Elderly Person or Disabled
Adult 2913.02(A)(3)[F4]
- CT7: Misuse of Credit Cards
2913.21(B)(2)[F4]
- CT8: Theft From Elderly Person or Disabled
Adult 2913.02(A)(2)[F4]
- CT9: Theft From Elderly Person or Disabled
Adult 2913.02(A)(3)[F4]
- CT10: Misuse of Credit Cards
2913.21(B)(2)[F4]
- CT11: Theft From Elderly Person or Disabled
Adult 2913.02(A)(2)[F4]
- CT12: Theft From Elderly Person or Disabled
Adult 2913.02(A)(3)[F4]
- CT13: Misuse of Credit Cards
2913.21(B)(2)[F4]
- CT14: Theft From Elderly Person or Disabled
Adult 2913.02(A)(2)[F4]
- CT15: Theft From Elderly Person or Disabled
Adult 2913.02(A)(3)[F4]
- CT16: Theft From Elderly Person or Disabled
Adult 2913.02(A)(2)[F3]
- CT17: Theft From Elderly Person or Disabled
Adult 2913.02(A)(3)[F3]
- CT18: Theft From Elderly Person or Disabled
Adult 2913.02(A)(2)[F4]

- CT19: Theft From Elderly Person or Disabled Adult 2913.02(A)(3)[F4]
- CT20: Theft From Elderly Person or Disabled Adult 2913.02(A)(2)[F4]
- CT21: Theft From Elderly Person or Disabled Adult 2913.02(A)(3)[F4]
- CT22: Theft From Elderly Person or Disabled Adult 2913.02(A)(3)[F2]

In the Court of Common Pleas, Hamilton County, Ohio, of the Grand Jury Term Two Thousand and Fourteen.

FIRST COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO, from on or about the 1ST day of October, Two Thousand and Thirteen to on or about the 31ST day of December, Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **with purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: ANTIQUE CHANDELIER belonging to PATRICIA GRONEMAN, AGE 88, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent, and at the time, the said victim of the offense was an elderly person or disabled adult,** in violation of Section 2913.02(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

SECOND COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO, from on or about the 1ST day of October, Two Thousand and Thirteen to on or about the 31ST day of**

December, Two Thousand and Thirteen at the County of Hamilton and State of Ohio aforesaid, **with purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: ANTIQUE CHANDELIER belonging to PATRICIA GRONEMAN, AGE 88, knowingly obtained or exerted control over such property or services by deception, and at the time, the said victim of the offense was an elderly person or disabled adult,** in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

THIRD COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO, on or about the 26TH day of November in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **with purpose to deprive the owner of certain property or services, to wit: \$800.00 belonging to PATRICIA GRONEMAN, AGE 88, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent, and at the time, the said victim of the offense was an elderly person or disabled adult,** in violation of Section 2913.02(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FOURTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO, on or about the 26TH day of November in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **with purpose to deprive the owner of certain property or services, to wit: \$800.00 belonging to PATRICIA GRONEMAN, AGE 88, knowingly obtained or exerted control over such property or services by deception, and at the time, the said victim of the offense was an elderly**

person or disabled adult, in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FIFTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO**, on or about the 25TH day of November in the year Two Thousand and Thirteen at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: \$1,725.30 PURCHASE WITH THE VICTIM'S DISCOVER CARD belonging to PATRICIA GRONEMAN, AGE 88, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent, and at the time, the said victim of the offense was an elderly person or disabled adult, in violation of Section 2913.02(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

SIXTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO**, on or about the 25TH day of November in the year Two Thousand and Thirteen at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: \$1,725.30 PURCHASE WITH THE VICTIM'S DISCOVER CARD belonging to PATRICIA GRONEMAN, AGE 88, knowingly obtained or exerted control over such property or services by deception, and at the time, the said victim of the offense was an elderly person or disabled adult, in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

SEVENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO**, on or about the **25TH** day of **November** in the year **Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, with **purpose to defraud, knowingly obtained property or services, to wit: EFX LIGHTING MATERIALS, by the use of a credit card to wit: DISCOVER CARD, in one or more transactions, knowing or having reasonable cause to believe that the card had expired, or been revoked, or was obtained, was retained, or was being used in violation of law, and the said victim of the offense was an elderly person or a disabled adult and the debt for which the card was held as security or the cumulative retail value of the property or services involved in the violation was \$1,000 or more and less than \$7,500**, in violation of Section 2913.21(B)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

EIGHTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO**, from on or about the **4TH** day of **December**, **Two Thousand and Thirteen** to on or about the **31ST** day of **December, Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, with **purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: \$2,189.07 IN PURCHASES FROM THE HOME DEPOT WITH THE VICTIM'S GIFT CARDS** belonging to **PATRICIA GRONEMAN, AGE 88**, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent, and at the time, the said victim of the offense was an elderly

person or disabled adult, in violation of Section 2913.02(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

NINTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO**, from on or about the 4TH day of December, Two Thousand and Thirteen to on or about the 31ST day of December, Two Thousand and Thirteen at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: \$2,189.07 IN PURCHASES FROM THE HOME DEPOT WITH THE VICTIM'S GIFT CARDS belonging to PATRICIA GRONEMAN, AGE 88, knowingly obtained or exerted control over such property or services by deception, and at the time, the said victim of the offense was an elderly person or disabled adult, in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO**, from on or about the 4TH day of December, Two Thousand and Thirteen to on or about the 31ST day of December, Two Thousand and Thirteen at the County of Hamilton and State of Ohio aforesaid, with purpose to defraud, knowingly obtained property or services, to wit: HOME DEPOT PURCHASES, by the use of HOME DEPOT GIFT CARDS , in one or more transactions, knowing or having reasonable cause to believe that the card had expired, or been revoked, or was obtained, was retained, or was being used in violation of law, and the said victim of the offense was an elderly person or a disabled adult and the debt for which the card was held as security or the cumulative retail value of

the property or services involved in the violation was \$1,000 or more and less than \$7,500, in violation of Section 2913.21(B)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

ELEVENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO, on or about the 20TH day of December in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **with purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: \$1,644.72 IN MATERIALS PURCHASED FROM PEASE WAREHOUSE** belonging to **PATRICIA GRONEMAN, AGE 88, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent, and at the time, the said victim of the offense was an elderly person or disabled adult**, in violation of Section 2913.02(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWELFTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO, on or about the 20TH day of December in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **with purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: \$1,644.72 IN MATERIALS PURCHASED FROM PEASE WAREHOUSE** belonging to **PATRICIA GRONEMAN, AGE 88, knowingly obtained or exerted control over such property or services by deception, and at the time, the said victim of the offense was an elderly person or disabled adult**, in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

THIRTEENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO, on or about the 20TH day of December in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **with purpose to defraud, knowingly obtained property or services, to wit: MATERIALS PURCHASED FROM PEASE WAREHOUSE, by the use of a credit card to wit: FIFTH THIRD BANK MASTERCARD, in one or more transactions, knowing or having reasonable cause to believe that the card had expired, or been revoked, or was obtained, was retained, or was being used in violation of law, and the said victim of the offense was an elderly person or a disabled adult and the debt for which the card was held as security or the cumulative retail value of the property or services involved in the violation was \$1,000 or more and less than \$7,500,** in violation of Section 2913.21(B)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FOURTEENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO, from on or about the 1ST day of October, Two Thousand and Thirteen to on or about the 31ST day of December, Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **with purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: \$7,359.09 belonging to PATRICIA GRONEMAN, AGE 88, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent, and at the time, the said victim of the offense was an elderly person or disabled adult,** in violation of Section 2913.02(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

FIFTEENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO**, from on or about the 1ST day of October, Two Thousand and Thirteen to on or about the 31ST day of December, Two Thousand and Thirteen at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: \$7,359.09 belonging to **PATRICIA GRONEMAN**, AGE 88, knowingly obtained or exerted control over such property or services by deception, and at the time, the said victim of the offense was an elderly person or disabled adult, in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

SIXTEENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO**, from on or about the 9TH day of January, Two Thousand and Twelve to on or about the 31ST day of December, Two Thousand and Thirteen at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$7,500 or more but less than \$37,500, to wit: \$31,000.03 belonging to **PATRICIA GRONEMAN**, AGE 88, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent, and at the time, the said victim of the offense was an elderly person or disabled adult, in violation of Section 2913.02(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

SEVENTEENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO**, from on or about the 9TH day of January, Two Thousand and Twelve to on or about the 31ST day of December, Two Thousand and Thirteen at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$7,500 or more but less than \$37,500, to wit: \$31,000.03 belonging to **PATRICIA GRONEMAN, AGE 88**, knowingly obtained or exerted control over such property or services by deception, and at the time, the said victim of the offense was an elderly person or disabled adult, in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

EIGHTEENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO**, on or about the 3RD day of February in the year Two Thousand and Thirteen at the County of Hamilton and State of Ohio aforesaid, with purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: **THREE WATER HEATERS** belonging to **PATRICIA GRONEMAN, AGE 88**, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent, and at the time, the said victim of the offense was an elderly person or disabled adult, in violation of Section 2913.02(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

NINETEENTH COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO, on or about the 3RD day of February in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **with purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: THREE WATER HEATERS belonging to PATRICIA GRONEMAN, AGE 88, knowingly obtained or exerted control over such property or services by deception, and at the time, the said victim of the offense was an elderly person or disabled adult,** in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWENTIETH COUNT

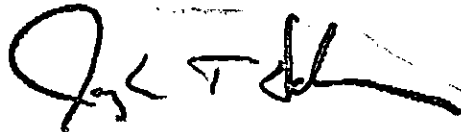
The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO, on or about the 25TH day of February in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **with purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: TWO FURNACES belonging to PATRICIA GRONEMAN, AGE 88, knowingly obtained or exerted control over such property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent, and at the time, the said victim of the offense was an elderly person or disabled adult,** in violation of Section 2913.02(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWENTY-FIRST COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO, on or about the 25TH day of February in the year Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **with purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: TWO FURNACES belonging to PATRICIA GRONEMAN, AGE 88, knowingly obtained or exerted control over such property or services by deception, and at the time, the said victim of the offense was an elderly person or disabled adult,** in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

TWENTY-SECOND COUNT

The Grand Jurors of the County of Hamilton, in the name and by authority of the State of Ohio, upon their oaths do find and present that **WILLIAM MODAFARI AKA WILLIAM MONTUANO, from on or about the 9TH day of January, Two Thousand and Twelve to on or about the 31ST day of December, Two Thousand and Thirteen** at the County of Hamilton and State of Ohio aforesaid, **with purpose to deprive the owner of certain property or services worth \$37,500 or more but less than \$150,000, to wit: \$48,281.44 belonging to PATRICIA GRONEMAN, AGE 88, knowingly obtained or exerted control over such property or services by deception, and at the time, the said victim of the offense was an elderly person or disabled adult,** in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.



Joseph T. Deters
Prosecuting Attorney
Hamilton County, Ohio

Reported and filed this

27 day of August, A.D. 2014

By: 

Special Prosecuting Attorney
Jesse B. Kramig
Senior Assistant Attorney General
Office Of The Ohio Attorney General
441 Vine Street
Cincinnati, Ohio 45202
(513)852-1520

By: **Tracy Winkler**
Clerk of Hamilton County
Common Pleas



By: _____
Deputy

A TRUE BILL

By: 

Foreperson, Grand Jury