THE STATE OF OHIO, HAMILTON COUNTY

COURT OF COMMON PLEAS



STATE OF OHIO

Plaintiff

Case No. B 1201988

-vs-

JOSHUA JAMES SALYERS

Defendant

PROSECUTING ATTORNEY'S REQUEST FOR ISSUANCE OF WARRANT UPON INDICTMENT

TO THE CLERK OF THE COURT OF COMMON PLEAS:

JOSHUA JAMES SALYERS 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

() Carlo

SPECIAL PROSECUTOR

COSGROUE

#0073319

THE STATE OF OHIO, HAMILTON COUNTY

COURT OF COMMON PLEAS

THE STATE OF OHIO

Case No. B 1201988

HAMILTON COUNTY, ss:

INDICTMENT FOR:

CT1: Engaging in a Pattern of Corrupt Activity 2923.32(A)(1)[F2]

CT2: Theft From Elderly Person or Disabled

Adult 2913.02(A)(3)[F4]

CT3: Theft 2913.02(A)(3)[F5]

CT4: Theft 2913.02(A)(3)[F4]

CT5: Theft From Elderly Person or Disabled

Adult 2913.02(A)(3)[F4]

CT6: Theft 2913.02(A)(3)[F5]

CT7: Theft 2913.02(A)(3)[F5]

CT8: Theft 2913.02(A)(3)[F5]

CT9: Theft From Elderly Person or Disabled

Adult 2913.02(A)(3)[F4]

CT10: Theft 2913.02(A)(3)[F5]

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

FIRST COUNT

The Grand Jurors of the County of Hamilton, in the name and by the authority of the State of Ohio, upon their oaths do find and present that Joshua Salyers between June 29, 2010 and December 22, 2011 in Hamilton County, Ohio, or another county whereby venue is properly placed in Hamilton County, Ohio, while employed by, or associated with, an enterprise, to wit: Salyers Complete Contracting, LLC, did conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity, to wit: the criminal acts separately charged in Counts Two through Ten of this indictment, as if fully re-written herein, as well as other related acts of theft and theft from the elderly, the total amount of the

property involved being in excess of one thousand dollars (\$1000.00), in violation of 2932.32 (A)(1) of the Ohio Revised Code, a felony of the second degree, and against the peace and dignity of the State of Ohio., in violation of Section 2923.32(A)(1) 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 JOSHUA JAMES SALYERS, on or about the 20TH day of May in the year Two Thousand and Eleven 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: UNITED STATES CURRENCY belonging to ROY JONES, 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 JOSHUA JAMES SALYERS, on an undetermined date in December of Two Thousand and Ten, in Hamilton County, Ohio or another county where by venue is properly placed in Hamilton County, Ohio, with purpose to deprive the owner of certain property or services worth \$1000 or more, to wit: UNITED STATES CURRENCY belonging to JERI FIELDS, knowingly obtained or exerted control over such property or services by deception, in violation of Section 2913.02(A)(3) 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 JOSHUA JAMES SALYERS, on or about the 19TH day of September in the year Two Thousand and Eleven in Hamilton County, Ohio, or another county whereby venue is properly placed in Hamilton County, Ohio, with purpose to deprive the owner of certain property or services worth \$7500 or more, to wit: UNITED STATES CURRENCY belonging to NED MORTON, knowingly obtained or exerted control over such property or services by deception, 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 JOSHUA JAMES SALYERS, on an undetermined date in October of Two Thousand and Eleven in Hamilton County, Ohio, or another county whereby venue is properly placed on Hamilton County, Ohio, with purpose to deprive the owner of certain property or services worth \$1000 or more but less than \$7,500, to wit: UNITED STATES CURRENCY belonging to HUGH BLEIGH, 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.

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 JOSHUA JAMES SALYERS, on an undetermined date in October of Two Thousand and Eleven, in Hamilton County, Ohio, or another county whereby venue is properly placed on Hamilton County, Ohio, with purpose to deprive the owner of certain property or services worth \$1000 or more, to wit: UNITED STATES CURRENCY belonging to TUNDA JENNINGS,

knowingly obtained or exerted control over such property or services by deception, 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 JOSHUA JAMES SALYERS, on an undetermined date in October of Two Thousand and Eleven, in Hamilton County, Ohio, or another county whereby venue is properly placed on Hamilton County, Ohio, with purpose to deprive the owner of certain property or services worth \$1000 or more, to wit: UNITED STATES CURRENCY belonging to JANNEL PALOMBO, knowingly obtained or exerted control over such property or services by deception, in violation of Section 2913.02(A)(3) 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 JOSHUA JAMES SALYERS, on an undetermined date in October of Two Thousand and Eleven, in Hamilton County, Ohio, or another county whereby venue is properly placed on Hamilton County, Ohio, with purpose to deprive the owner of certain property or services worth \$1000 or more, to wit: UNITED STATES CURRENCY belonging to CHRISTINE SIMON, knowingly obtained or exerted control over such property or services by deception, in violation of Section 2913.02(A)(3) 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 **JOSHUA JAMES SALYERS**, on an undetermined date in October of Two Thousand and Eleven, in Hamilton County, Ohio, or another county whereby venue is properly placed on Hamilton County, Ohio, with purpose to deprive the owner of certain property or services

worth \$1000 or more but less than \$7,500, to wit: UNITED STATES CURRENCY belonging to JUDY HILL, 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 JOSHUA JAMES SALYERS, on an undetermined date in October of Two Thousand and Eleven in Hamilton County, Ohio, or another county whereby venue is properly placed on Hamilton County, Ohio,, with purpose to deprive the owner of certain property or services worth \$1000 or more, to wit: UNITED STATES CURRENCY belonging to MATTHEW BURKHARDT, knowingly obtained or exerted control over such property or services by deception, 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 Obi

Hamilton County, Ohio

• · •		W 14/
Reported and filed this		By/// Dailly/////
12 day of April, A.D. 2012		Assistant Prosecuting Anomey SPECIAL PROSECURING COSCROUE 40073319
Ву:	Tracy Winkler Clerk of Hamilton County Common Pleas	A TRUE BILL
Ву:	Deputy	By: A Exercise Service