

FILED  
KNOX COUNTY  
COURT OF COMMON PLEAS  
**IN THE COURT OF COMMON PLEAS, KNOX COUNTY, OHIO**

2022 SEP 27 PM 12:48

STATE OF OHIO

Plaintiff CHRISTY MILLIGAN STATON  
CLERK OF COURTS

-vs-

Case No. 22CR09- 0205

DANIAL R. BOBO

Defendant

**REQUEST FOR ISSUANCE OF SUMMONS**

TO: Christy Milligan Staton, Clerk of Courts

DANIAL R. BOBO has been named a Defendant in an indictment returned by the grand jury. Please issue summons to the ~~Franklin County~~ Sheriff and direct him to make personal service upon:

Name: DANIAL R. BOBO  
Birthdate: 8/27/1972  
SSN: XXX-XX-6469  
Address:

**Service to be made by and through his legal representative:**

Sam Shamansky, Esq  
523 South 3<sup>rd</sup> St.  
Columbus, OH 43215



OAG, Brad L. Tammara  
Assistant Attorney General

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

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KNOX COUNTY  
COURT OF COMMON PLEAS  
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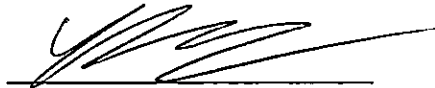
State of Ohio, Plaintiff,  v.  Danial R Bobo, Defendant.	A True Bill Indictment For: CHRISTY MILLIGAN STATION CLERK OF COURTS  Engaging in a Pattern of Corrupt Activity ss 2923.32(A)  Additional Counts: Complicity to Theft; Complicity to Misuse of Credit Card; Complicity to Telecommunications Fraud	
<b>Dates of Offense (on or about):</b>	<b>The Term of:</b> of 2022	<b>Case Number</b> <div style="font-family: cursive; font-size: 1.2em;">22CR09-0205</div>

**The State of Ohio,    }**  
**Knox County    } ss**

<b>Count One:</b>	<b>Engaging in a Pattern of Corrupt Activity [Felony 1] R.C. 2923.32(A)(1)/(A)(2)/(A)(3)</b>
<b>Defendant:</b>	Danial R Bobo
<b>Date of Offense:</b>	From on or about December 1, 2017 though on or about at least November 30, 2020
<p><i>The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OHIO, do find and present, that the above-named Defendant, on or about the date of offense set forth above, in a continuous course of conduct involving offenses committed in the County of Knox, unlawfully:</i></p> <p>In the period of from on or about at least December 1, 2017 through on or about at least November 30, 2020, in Knox County, Ohio, or by some manner enumerated in R.C. 2901.12, whereby venue is placed in Knox County, Defendant did, at least recklessly, in a continuous course of conduct, while associated with, an enterprise, as defined in R.C. 2923.31(C), conduct or participate in, directly or indirectly, the affairs of the enterprise, through a pattern of corrupt activity, as defined in R.C. 2923.31(E), consisting of two or more incidents of corrupt activity, to wit: Misuse of Credit Card, a violation of R.C. Section 2913.21, Complicity to Theft, a violation of R.C. section 2913.02(A)(1) and/or (A)(2) and/or (A)(3), and Telecommunications Fraud, a violation of R.C. section 2913.05; and/or did, at least recklessly, in a continuous course of conduct, though a pattern of corrupt activity, as defined above, acquire or maintain, directly or indirectly, an interest in, or control of, real property; and/or did knowingly receive proceeds</p>	

derived, directly or indirectly, from a pattern of corrupt activity, as defined above, and did use or invest, directly or indirectly, at least part of those proceeds in the acquisition of any title to, or right, interest, or equity in, real property;

*The offense is contrary to and in violation of the form of the statute, R.C. 2923.32(A), and against the peace and dignity of the State of Ohio, a Felony of the First Degree. The commission of this offense was part of a course of criminal conduct involving offenses committed in Knox County as per R.C. 2901.12.*



Foreperson of the Grand Jury



Prosecuting Attorney (Special Prosecutor)  
Dave Yost, Ohio Attorney General

By: AAG Brad Tammara (0030156)  
Special Prosecutions  
30 E Broad St., 23<sup>rd</sup> Floor  
Columbus, Ohio 43215

**Count Two:**                    **Complicity to Theft [Felony 1]**  
                                     **R.C. 2913.02 (A)(2),(A)(3), R.C. 2923.03**

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**Defendant:**                    **Danial R Bobo**

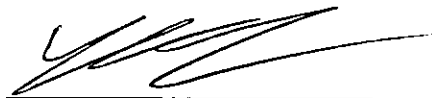
CHRISTY MILLIGAN STATION  
CLERK OF COURTS

**Date of Offense:**        From on or about at least February 1, 2018, though on  
                                     or about at least November 30, 2020


*The Grand Jurors, on their oaths, further find that Defendant unlawfully:*

In the period of from on or about at least February 1, 2018, through on or about at least November 30, 2020, in a continuing course of conduct involving offenses committed in Knox County, Ohio, Defendant did knowingly exert or obtain control over, or knowingly solicit or procure another to, or knowingly aid or abet another to exert or obtain control over the property or services of another; to wit: an elderly person, with the purpose to deprive those persons of said property or services, totaling one hundred fifty thousand thousand dollars or more, without the consent of the owner or person authorized to give consent; or beyond the scope of express or implied consent of the owner or person authorized to give consent; or by deception.

*The offense is contrary to and in violation of the form of the statute, R.C. 2913.02 and R.C. 2923.03 and against the peace and dignity of the State of Ohio, a Felony of the First Degree. The commission of the offense was part of a course of continuing conduct involving offenses committed in Knox County as per R.C. 2901.12.*



Foreperson of the Grand Jury



Prosecuting Attorney (Special Prosecutor)  
Dave Yost, Ohio Attorney General

By:    AAG Brad Tammaro (0030156)  
         Special Prosecutions  
         30 E Broad St., 23<sup>rd</sup> Floor  
         Columbus, Ohio 43215

**Count Three:**      **Complicity to Telecommunications Fraud [Felony**  
**R.C. 2913.05, R.C 2923.03**

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CHRISTY MILLIGAN STATION  
CLERK OF COURTS

**Defendant:**      **Danial R Bobo**

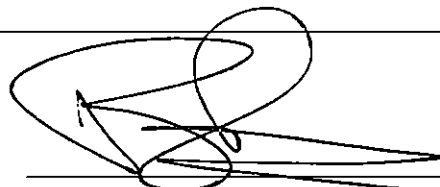
**Date of Offense:**      From between on or about at least December 1, 2017  
Through on or about at least November 30, 2020

*The Grand Jurors, on their oaths, further find that Defendant unlawfully:*

From between on or about at least December 1, 2017, through on or about at least November 30, 2020, in a continuing course of conduct involving offenses committed in Knox County, Ohio, Defendant did, having devised a scheme to defraud, knowingly disseminate or transmit, by means of a telecommunications device or telecommunication service, a signal or sound with the purpose to execute or otherwise further the scheme to defraud, or knowingly solicit or procure another to, or knowingly aid or abet another to disseminate or transmit, by means of a telecommunications device or telecommunication service, a signal or sound with the purpose to execute or otherwise further the scheme to defraud. The value of the benefit involved or of the detriment to the victim, to wit: an elderly person, of the fraud was seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

*The offense is contrary to and in violation of the form of the statute, R.C. 2913.05 and R.C. 2923.03 and against the peace and dignity of the State of Ohio, a Felony of the Third Degree pursuant to R.C. 2913.05(C). The commission of the offense was part of a course of continuing conduct involving offenses committed in Knox County as per R.C. 2901.12.*

  
\_\_\_\_\_  
Foreperson of the Grand Jury

  
\_\_\_\_\_  
Prosecuting Attorney (Special Prosecutor)  
Dave Yost, Ohio Attorney General

By:    AAG Brad Tammaro (0030156)  
Special Prosecutions  
150 E Gay St., 16<sup>th</sup> Floor  
Columbus, Ohio 43215

**Count Four:**            **Complicity to Telecommunications Fraud [Felony 3rd Degree]**  
                                 **R.C. 2913.05, R.C. 2923.03**

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CHRISTY MILLIGAN STATON  
CLERK OF COURTS

**Defendant:**            **Danial R Bobo**

**Date of Offense:**    From between on or about at least September 1, 2019  
                                 Through on or about at least July 31, 2020

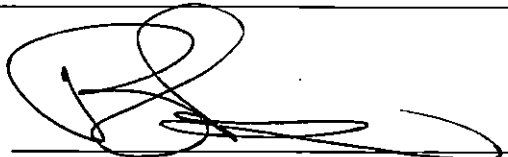
*The Grand Jurors, on their oaths, further find that Defendant unlawfully:*

From between on or about at least September 1, 2019, through on or about at least July 31, 2020, in a continuing course of conduct involving offenses committed in Knox County, Ohio, Defendant did, having devised a scheme to defraud, knowingly disseminate or transmit, by means of a telecommunications device or telecommunication service, a signal or sound with the purpose to execute or otherwise further the scheme to defraud, or knowingly solicit or procure another to, or knowingly aid or abet another to disseminate or transmit, by means of a telecommunications device or telecommunication service, a signal or sound with the purpose to execute or otherwise further the scheme to defraud. The value of the benefit involved or of the detriment to the victim, to wit: an elderly person, of the fraud was seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

*The offense is contrary to and in violation of the form of the statute, R.C. 2913.05 and R.C. 2923.03 and against the peace and dignity of the State of Ohio, a Felony of the Third Degree pursuant to R.C. 2913.05(C). The commission of the offense was part of a course of continuing conduct involving offenses committed in Knox County as per R.C. 2901.12.*



Foreperson of the Grand Jury



Prosecuting Attorney (Special Prosecutor)  
Dave Yost, Ohio Attorney General

By:    AAG Brad Tammaro (0030156)  
         Special Prosecutions  
         150 E Gay St., 16<sup>th</sup> Floor  
         Columbus, Ohio 43215

**Count Five:**                    **Complicity to Misuse of Credit Card [Felony 2]**  
**R.C. 2913.21; R.C. 2923.03**

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**Defendant:**                    **Danial R Bobo**


CHRISTY MILLIGAN STATION  
CLERK OF COURTS

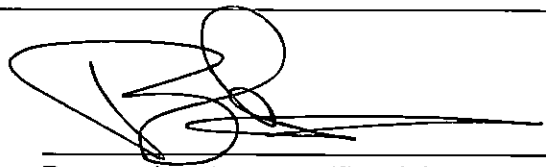
**Date of Offense:**            From between on or about at least March 1, 2018  
   though on or about at least November 30, 2020

*The Grand Jurors, on their oaths, further find that Defendant unlawfully:*

In the period of from between on or about at least March 1, 2018 through on or about at least November 30, 2020, in a continuing course of conduct involving offenses committed in Knox County, Ohio, Defendant did, with purpose to defraud, obtain property or services by the use of a credit card, in one or more transactions, knowing or having reasonable cause to believe that the card is being used in violation of law, or did solicit or procure another to, or knowingly aid or abet another to obtain property or services by the use of a credit card, in one or more transactions, knowing or having reasonable cause to believe that the card is being used in violation of law. The victim of the offense is an elderly person or disabled adult where the cumulative retail value of the property or services involved is thirty-seven thousand five hundred dollars or more.

*The offense is contrary to and in violation of the form of the statute, R.C. 2913.21(B) and R.C. 2923.03 and against the peace and dignity of the State of Ohio, and pursuant to R.C. 2913.21(D)(4), a Felony of the Second Degree. The commission of the offense was part of a course of continuing conduct involving offenses committed in Knox County as per R.C. 2901.12.*

  
Foreperson of the Grand Jury

  
Prosecuting Attorney (Special Prosecutor)  
Dave Yost, Ohio Attorney General

By:    AAG Brad Tammaro (0030156)  
         Special Prosecutions  
         30 E Broad St., 23<sup>rd</sup> Floor  
         Columbus, Ohio 43215

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CHRISTY HILLIGAN STATION  
CLERK OF COURTS

**Count Six:**                      **Complicity to Misuse of Credit Card [Felony 2]**  
   **R.C. 2913.21; R.C. 2923.03**

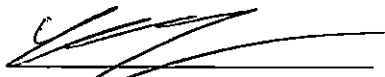
**Defendant:**                      **Danial R Bobo**

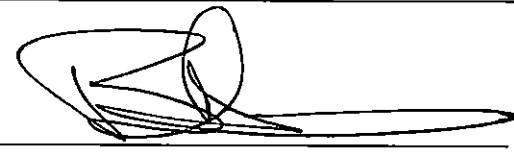
**Date of Offense:**              From between on or about at least December 1, 2017  
   though on or about at least April 30, 2020

*The Grand Jurors, on their oaths, further find that Defendant unlawfully:*

In the period of from between on or about at least December 1, 2017 through on or about at least April 30, 2020, in a continuing course of conduct involving offenses committed in Knox County, Ohio, Defendant did, with purpose to defraud, obtain property or services by the use of a credit card, in one or more transactions, knowing or having reasonable cause to believe that the card is being used in violation of law, or did solicit or procure another to, or knowingly aid or abet another to obtain property or services by the use of a credit card, in one or more transactions, knowing or having reasonable cause to believe that the card is being used in violation of law. The victim of the offense is an elderly person or disabled adult where the cumulative retail value of the property or services involved is thirty-seven thousand five hundred dollars or more.

*The offense is contrary to and in violation of the form of the statute, R.C. 2913.21(B) and R.C. 2923.03 and against the peace and dignity of the State of Ohio, and pursuant to R.C. 2913.21(D)(4), a Felony of the Second Degree. The commission of the offense was part of a course of continuing conduct involving offenses committed in Knox County as per R.C. 2901.12.*

  
Foreperson of the Grand Jury

  
Prosecuting Attorney (Special Prosecutor)  
Dave Yost, Ohio Attorney General

By:     AAG Brad Tammaro (0030156)  
         Special Prosecutions  
         30 E Broad St., 23<sup>rd</sup> Floor  
         Columbus, Ohio 43215

**Count Seven:** **Complicity to Telecommunication Fraud [Felony 4]** 2022 SEP 27  
**R.C. 2913.05, R.C. 2923.03**

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**Defendant:** **Daniel R Bobo**

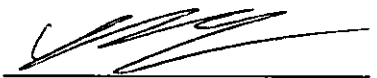
CHRISTY MILLIGAN STATION  
CLERK OF COURTS

**Date of Offense:** From on or about at least January 2, 2020, though on  
or about at least August 10, 2020


*The Grand Jurors, on their oaths, further find that Defendant unlawfully:*

In the period of from on or about at least January 2, 2020 through on or about at least August 10, 2020, in a continuing course of conduct involving offenses committed in Knox County, Ohio, Defendant did, having devised a scheme to defraud, knowingly disseminate or transmit, by means of a telecommunications device or telecommunication service, a signal or sound with the purpose to execute or otherwise further the scheme to defraud, or knowingly solicit or procure another to, or knowingly aid or abet another to disseminate or transmit, by means of a telecommunications device or telecommunication service, a signal or sound with the purpose to execute or otherwise further the scheme to defraud. The value of the benefit involved or of the detriment to the victim, to wit: an elderly person, of the fraud was one thousand dollars or more and is less than seven thousand five hundred dollars.

*The offense is contrary to and in violation of the form of the statute, R.C. 2913.05 and against the peace and dignity of the State of Ohio, a Felony of the Fourth Degree. The commission of the offense was part of a course of continuing conduct involving offenses committed in Knox County as per R.C. 2901.12.*



Foreperson of the Grand Jury



Prosecuting Attorney (Special Prosecutor)  
Dave Yost, Ohio Attorney General

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Special Prosecutions  
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Columbus, Ohio 43215