

IN THE COURT OF COMMON PLEAS
TRUMBULL COUNTY, OHIO

STATE OF OHIO,

Plaintiff

-vs-

ANTHONY CIOFFI, JR.,

Defendant

CASE NO. 96 CR 599

JUDGE MITCHELL F. SHAKER

STATE'S ANSWER TO
DEFENDANT'S REQUEST FOR
BILL OF PARTICULARS

Now comes State of Ohio by and through the undersigned counsel in response to Defendant's request for a Bill of Particulars pursuant to Ohio Criminal Rule 7E and answers as follows:

The Defendant has been indicted on six (6) counts.

In regard to Count 1, Rape (Life), on or about the summer of 1991, at 1335 W. Belle St. S.E., Warren, Trumbull County, Ohio, the Defendant did engage in sexual conduct, to wit: the Defendant did force his son, Anthony Cioffi, (DOB 1/9/85) to perform fellatio upon him. The son is less than thirteen years of age, whether or not the offender knows of the age of that person. The Defendant told Anthony that if he told anyone he would kill him and his mother.

In regard to Count 2, Rape (Life), at the same time and at the same location as above, in Trumbull County, Ohio, the Defendant did engage in sexual conduct, to wit: the Defendant did perform fellatio on his son, Anthony Cioffi, (DOB 1/9/85) who was less than 13 at the time. The Defendant forced Anthony to comply by threatening to kill him and his mother if he told anybody.

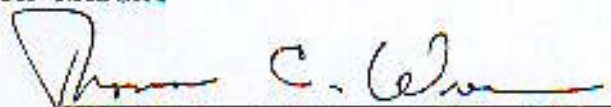
Count 3 is also Rape (Life), and it occurred at the same time and in the same location in Trumbull County, Ohio. The Defendant performed anal intercourse upon his son Anthony who was less than thirteen. He forced him to comply by threatening to kill him and his mother if he told anyone.

In regard to Count 4, Gross Sexual Imposition, at the same time and location in Trumbull County, Ohio, the Defendant did have sexual contact with another, not his spouse, to wit: he fondled the penis of his son Anthony. The other person was less than thirteen years of age, whether or not the offender knew of his age.

Count 5, Gross Sexual Imposition, also occurred at the same time and at the same location in Trumbull County, Ohio, the Defendant did have sexual contact with another, his son Anthony who was less than 13 years of age. More specifically, he fondled the buttocks of Anthony.

Finally, Count 6, Gross Sexual Imposition, occurred at the same time and at the same location in Trumbull County, Ohio. The Defendant fondled the penis of his younger son Matthew who was less than 13 years of age (DOB 7/22/87).

FURTHER PLAINTIFF SAYETH NAUGHT



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