

IN THE COURT OF COMMON PLEAS
TRUMBULL COUNTY, OHIO

STATE OF OHIO,

Plaintiff

vs.

ANTHONY CIOFFI, JR

Defendant

CASE NO. 95-CR-596

JUDGE JOHN M. STUARD

BILL OF PARTICULARS

Now comes Plaintiff, State of Ohio, by and through the undersigned counsel, and pursuant to a request by the defense, submits a Bill of Particulars in this case:

With regard to Count 1 of the indictment, the State submits the evidence will show that on or about the 16th day of September, 1995, the Defendant, at 206 S. Market St., Girard, Trumbull County, Ohio, did have sexual contact with Megan McKelvey, not the spouse of the offender. The victim, Megan McKelvey, whose birth date is 12/29/86 is less than thirteen years of age. Specifically, the victim will testify that the Defendant woke her up in the middle of the night, carried her down the stairs. He told her not to yell and he proceeded to fondle her genital area inside of her clothing.

With regard to Count 2 of the indictment, the State alleges that the evidence will show that on or about September, 1994, the Defendant, at 206 S. Market St., Girard, Trumbull County, Ohio, did have sexual contact with Megan McKelvey, whose birth date is 12/29/86 is less than thirteen years of age. Specifically, the victim will testify that the Defendant touched her genitals under her clothing and that this occurred in the bathroom.

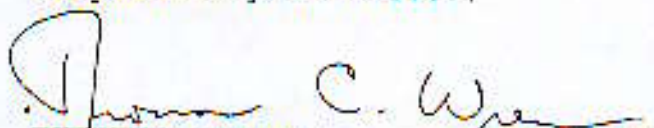
With regard to Count 3, the State alleges that on or about

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the 16th day of September, 1995, at 206 S. Market St., Girard, Trumbull County, Ohio, the Defendant did by force, threat or deception, restrain Sheila Schreckengost of her liberty, to facilitate the commission of any felony or flight thereafter. More specifically, after she discovered that the Defendant had allegedly fondled the vagina area of her daughter, Megan McKelvey, she attempted to call the police but the Defendant disconnected the phone, locked the doors so she could not get out and continued to keep her in the home until she was able to finally break a window with a baseball bat.

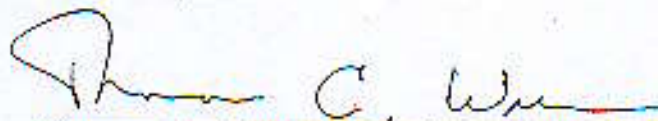
Respectfully submitted,



THOMAS C. WRENN #0051952
Chief Counsel - Child Assault Div.
Trumbull County Prosecutor's Off.
160 High Street, NW
Warren, Ohio 44481
(216) 675-2426

CERTIFICATION

I hereby certify that a copy of the foregoing was delivered by ordinary mail service to Thomas E. Zena, counsel for the defendant on this 20th day of December, 1995.



Thomas C. Wrenn #0051952
Chief Counsel - Child Assault Div.