

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

<p>State of Ohio,</p> <p style="margin-left: 100px;">Plaintiff</p> <p style="margin-left: 100px;">VS.</p> <p>Daniel Woolf,</p> <p style="margin-left: 100px;">Defendant</p>	<p>A True Bill Indictment For</p> <p>Pandering Sexually-Oriented Matter Involving a Minor - F2</p> <p>§2907.322(A)(1)</p> <p>21 Additional Count(s)</p>	
Dates of Offense (on or about) 05/23/2017 to 03/04/2021	The Term Of February of 2021	Case Number 657584-21-CR

The State of Ohio, }
Cuyahoga County } SS.

Count 1 **Pandering Sexually-Oriented Matter Involving a Minor - F2**
 §2907.322(A)(1)

Defendants Daniel Woolf

Date of Offense On or about December 28, 2020

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(s), on or about the date of the offense set forth above, in the County of Cuyahoga, unlawfully

did, with knowledge of the character of the material or performance involved, create, record, photograph, film, develop, reproduce, or publish material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 2 **Pandering Sexually-Oriented Matter Involving a Minor - F2**
 §2907.322(A)(1)

Defendants Daniel Woolf

Date of Offense On or about December 28, 2020

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, create, record, photograph, film, develop, reproduce, or publish material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count 3 **Pandering Sexually-Oriented Matter Involving a Minor - F2**
 §2907.322(A)(1)
Defendants Daniel Woolf
Date of Offense On or about December 28, 2020

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, create, record, photograph, film, develop, reproduce, or publish material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 4 **Pandering Sexually-Oriented Matter Involving a Minor - F2**
 §2907.322(A)(1)
Defendants Daniel Woolf
Date of Offense On or about December 28, 2020

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, create, record, photograph, film, develop, reproduce, or publish material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 5 **Pandering Sexually-Oriented Matter Involving a Minor - F2**
 §2907.322(A)(1)
Defendants Daniel Woolf
Date of Offense On or about May 23, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, create, record, photograph, film, develop, reproduce, or publish material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count 6 **Pandering Sexually-Oriented Matter Involving a Minor - F2**
 §2907.322(A)(1)
Defendants Daniel Woolf
Date of Offense On or about May 23, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, create, record, photograph, film, develop, reproduce, or publish material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 7 **Pandering Sexually-Oriented Matter Involving a Minor - F2**
 §2907.322(A)(1)
Defendants Daniel Woolf
Date of Offense On or about May 23, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, create, record, photograph, film, develop, reproduce, or publish material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 8 **Pandering Sexually-Oriented Matter Involving a Minor - F2**
 §2907.322(A)(1)
Defendants Daniel Woolf
Date of Offense On or about May 24, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, create, record, photograph, film, develop, reproduce, or publish material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count 9 **Pandering Sexually-Oriented Matter Involving a Minor - F2**
 §2907.322(A)(1)
Defendants Daniel Woolf
Date of Offense On or about May 24, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, create, record, photograph, film, develop, reproduce, or publish material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 10 **Pandering Sexually-Oriented Matter Involving a Minor - F2**
 §2907.322(A)(1)
Defendants Daniel Woolf
Date of Offense On or about May 24, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, create, record, photograph, film, develop, reproduce, or publish material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 11 **Pandering Sexually-Oriented Matter Involving a Minor - F2**
 §2907.322(A)(1)
Defendants Daniel Woolf
Date of Offense On or about May 31, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, create, record, photograph, film, develop, reproduce, or publish material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count 12 **Pandering Sexually-Oriented Matter Involving a Minor - F2**
§2907.322(A)(1)
Defendants Daniel Woolf
Date of Offense On or about June 11, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, create, record, photograph, film, develop, reproduce, or publish material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 13 **Pandering Sexually-Oriented Matter Involving a Minor - F2**
§2907.322(A)(1)
Defendants Daniel Woolf
Date of Offense On or about June 12, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, create, record, photograph, film, develop, reproduce, or publish material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 14 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F2**
§2907.323(A)(1)
Defendants Daniel Woolf
Date of Offense On or about May 30, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did recklessly create, direct, produce, or transfer material or performance that shows a minor in a state of nudity in violation of Section 2907.323 of the Revised Code.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count 15 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F2**
§2907.323(A)(1)
Defendants Daniel Woolf
Date of Offense On or about June 4, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did recklessly create, direct, produce, or transfer material or performance that shows a minor in a state of nudity in violation of Section 2907.323 of the Revised Code.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 16 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F2**
§2907.323(A)(1)
Defendants Daniel Woolf
Date of Offense On or about June 6, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did recklessly create, direct, produce, or transfer material or performance that shows a minor in a state of nudity in violation of Section 2907.323 of the Revised Code.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 17 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F2**
§2907.323(A)(1)
Defendants Daniel Woolf
Date of Offense On or about June 24, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did recklessly create, direct, produce, or transfer material or performance that shows a minor in a state of nudity in violation of Section 2907.323 of the Revised Code.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count 18 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F2**
§2907.323(A)(1)
Defendants Daniel Woolf
Date of Offense On or about July 2, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did recklessly create, direct, produce, or transfer material or performance that shows a minor in a state of nudity in violation of Section 2907.323 of the Revised Code.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 19 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F2**
§2907.323(A)(1)
Defendants Daniel Woolf
Date of Offense On or about July 6, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did recklessly create, direct, produce, or transfer material or performance that shows a minor in a state of nudity in violation of Section 2907.323 of the Revised Code.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 20 **Pandering Sexually-Oriented Matter Involving a Minor - F4**
§2907.322(A)(5)
Defendants Daniel Woolf
Date of Offense On or about May 23, 2017 to March 4, 2021

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, with knowledge of the character of the material or performance involved, knowingly solicit, receive, purchase, exchange, possess, or control material that shows a minor participating or engaging in sexual activity, masturbation, or bestiality.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count 21 **Illegal Use Of Minor In Nudity-Oriented Material Or Performance - F5**
§2907.323(A)(3)
Defendants Daniel Woolf
Date of Offense On or about May 23, 2017 to March 4, 2021

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did recklessly possess or view material or performance that shows a minor who was not Daniel Woolf's child or ward in a state of nudity in violation of Section 2907.323 of the Revised Code.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count 22 **Possessing Criminal Tools - F5**
§2923.24(A)
Defendants Daniel Woolf
Date of Offense On or about May 23, 2017 to March 4, 2021

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did possess or have under the person's control any substance, device, instrument, or article, to wit: HTC One A9 Cellular Device SN: HT5C2BE01850 and/or Microsoft Surface Pro with keyboard and cord and/or Samsung cell phone model SM-G892A SN:R38M708CXHA and/or MacBook Air Model-A1466 Serial Number C1N12MGG085 with purpose to use it criminally.

FURTHERMORE, the HTC One A9 Cellular Device SN: HT5C2BE01850 and/or Microsoft Surface Pro with keyboard and cord and/or Samsung cell phone model SM-G892A SN:R38M708CXHA and/or MacBook Air Model-A1466 Serial Number C1N12MGG085 involved in the offense were intended for use in the commission of a felony, to wit: R.C. 2907.322(A)(1) and/or R.C. 2907.322(A)(5) and/or R.C. 2907.323(A)(1) and/or R.C. 2907.323(A)(3).

Forfeiture of Property - §2941.1417(A)

The Grand Jurors further find and specify that

the defendant(s) is/are the owner(s) and/or possessor(s) of HTC One A9 Cellular Device SN: HT5C2BE01850 and/or Microsoft Surface Pro with keyboard and cord and/or Samsung cell phone model SM-G892A SN:R38M708CXHA and/or MacBook Air Model-A1466 Serial Number C1N12MGG085 which is contraband and/or property derived from or through the commission or facilitation of an offense, and/or is an instrumentality the offender(s) used or intended to use in the commission or facilitation of a felony offense.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney