



NAILAH K. BYRD
CUYAHOGA COUNTY CLERK OF COURTS
1200 Ontario Street
Cleveland, Ohio 44113

Court of Common Pleas

MOTION FOR...
May 27, 2025 15:11

By: JON PAUL RION 0067020

Confirmation Nbr. 3506896

THE STATE OF OHIO

CR 25 701663-A

vs.

Judge: ARRAIGNMENT ROOM

GREGORY J MOORE

Pages Filed: 4

**IN THE COMMON PLEAS COURT OF CUYAHOGA COUNTY, OHIO
CRIMINAL DIVISION**

STATE OF OHIO

Plaintiff,
vs.

GREGORY J. MOORE

Defendant.

CASE NO.: CR-25-701663

JUDGE

MOTION FOR BOND

Now comes the Defendant, **GREGORY J. MOORE**, by and through his counsel, **RION, RION AND RION, L.P.A., INC.**, and hereby moves this Court for an Order setting bond in this matter for reasons set forth in the attached memorandum.

A Memorandum in Support is attached hereto.

Respectfully submitted,

/s/ Jon Paul Rion

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ah

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the foregoing was sent to the Office of the Prosecutor on the same day of filing.

/s/ Jon Paul Rion

JON PAUL RION (#0067020)
RION, RION AND RION, L.P.A., INC.

MEMORANDUM IN SUPPORT

On Friday, May 2, 2025, Gregory Moore (herein after referred to as “Moore”) was at his dying father’s bedside in the Brookdale Nursing Home located in Austin, Texas. This is the same date the secret indictment was issued against Moore nearly twelve years after the tragic passing of A.S. and nearly ten years after the grand jury met on this case. Moore and his wife of twenty years, Melissa Moore, had flown down to Texas on Friday, May 2, 2025 for the imminent passing of Moore’s father, who was in end-of-life care. Their return flights were booked for Monday, May 5, 2025 through Frontier Airlines. This information was readily available to law enforcement. When law enforcement arrested Moore, he was arrested at his father’s bedside, where he had been for the past three hours. Moore was subsequently arrested and extradited from Texas to Ohio. Moore’s father passed away on Sunday, May 4, 2025.

Importantly, it has never been a concern that Moore is a flight risk. Moore has lived his entire life in the State of Ohio. He purchased his current residence with his wife in 2006, and has maintained that residence ever since.

Moore was raised by two Catholic parents in Cleveland, Ohio, who were actively involved in their church. Moore’s father was a deacon within their church. Moore himself is a practicing Catholic and eucharistic minister within his church. Moore’s father was a chemical engineer employed for Getty Oil and BP. His mother was an accountant. Moore’s wife has been gainfully employed in a professional capacity for thirty-five years.

Moore is fifty-one years old, married, and a father to a nine-year old son. Moore is a Cleveland native, having graduated from Walsh Jesuit High School. He attended college in

Dayton, Ohio at the University of Dayton, and he graduated with a juris doctorate from Cleveland-Marshall College of Law. Moore held his law license for fifteen years. For the past several years, Moore has been employed in the construction industry.

While the underlying allegations of this case are serious, the purpose of bond is to ensure the defendant's appearance at future court appearances. He has every intention of facing the accusations against him, for which he maintains his innocence. Despite the nature of the allegations, it is imperative to remember that Moore stands before this court cloaked in the presumption of innocence. The facts, as presented today, are merely allegations, and he steadfastly maintains his innocence. Moore understands the gravity of the charges and is prepared to vigorously defend against them in a court of law. To deny bond would be to overlook the core factors of stability weighing in favor of a reasonable bond - namely, enduring marriage, a lifelong presence in the area, a strong educational background and a history of employment. Moore deserves the opportunity to assist in his defense, maintain his employment, and continue to support his family, all while awaiting his day in court. We respectfully request that this Honorable Court grant bond, allowing Moore to return to the community where he poses no flight risk.

Respectfully Submitted,

/s/ Jon Paul Rion

JON PAUL RION (#0067020)
RION, RION AND RION, L.P.A., INC.