

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

State of Ohio, Plaintiff Daniel E. Mobley		vs. Chad L. Webb, Defendants	A True Bill Indictment For Aggravated Murder - UF §2903.01(A) 21 Additional Count(s)
Dates of Offense (on or about) 12/25/2021 to 12/26/2021	The Term Of January of 2022		Case Number 668014-22-CR

The State of Ohio, }
Cuyahoga County } **SS.**

Count 1 **Aggravated Murder - UF**
 §2903.01(A)
Defendants Daniel E. Mobley, Chad L. Webb
Date of Offense On or about December 25, 2021

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 purposely, and with prior calculation and design, cause the death of Chris Vo.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that

the offender had a firearm on or about his person or under his control while committing the offense.

Firearm Specification - 3 year - §2941.145(A)

The Grand Jurors further find and specify that

the offender had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that

the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit aggravated burglary, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that



Foreperson of the Grand Jury



Prosecuting Attorney

the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit aggravated robbery, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

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 **Aggravated Murder - UF**
 §2903.01(B)
Defendants Daniel E. Mobley, Chad L. Webb
Date of Offense On or about December 25, 2021

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
did purposely cause the death of, Chris Vo while committing, or attempting to commit, or while fleeing immediately after committing or attempting to commit the offense of aggravated burglary.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that
the offender had a firearm on or about his person or under his control while committing the offense.

Firearm Specification - 3 year - §2941.145(A)

The Grand Jurors further find and specify that
the offender had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that
the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit aggravated burglary, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that
the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit aggravated robbery, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

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 **Aggravated Murder - UF**
 §2903.01(B)

Defendants Daniel E. Mobley, Chad L. Webb

Date of Offense On or about December 25, 2021

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did purposely cause the death of, Chris Vo while committing, or attempting to commit, or while fleeing immediately after committing or attempting to commit the offense of aggravated robbery.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that
 the offender had a firearm on or about his person or under his control while committing the offense.

Firearm Specification - 3 year - §2941.145(A)

The Grand Jurors further find and specify that
 the offender had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that
 the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit aggravated burglary, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

Felony murder specification - §2929.04(A)(7)

The Grand Jurors further find and specify that
 the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit aggravated robbery, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design..

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 4 **Aggravated Burglary - F1**
 §2911.11(A)(1)

Defendants Daniel E. Mobley, Chad L. Webb

Date of Offense On or about December 25, 2021

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

did, by force, stealth, or deception, trespass, as defined in section 2911.21(A)(1) of the Revised Code, in an occupied structure or in a separately secured or separately occupied portion of an occupied structure, when Chris Vo, a person other than the accomplice, was present, with purpose to commit in the structure or in the separately secured or separately occupied portion of the structure a criminal offense, to wit: Aggravated Robbery, R.C. 2911.01(A), and the offender recklessly inflicted, or attempted or threatened to inflict physical harm on Chris Vo.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that

the offender had a firearm on or about his person or under his control while committing the offense.

Firearm Specification - 3 year - §2941.145(A)

The Grand Jurors further find and specify that

the offender had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the 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

Count 5 **Aggravated Robbery - F1**
 §2911.01(A)(3)

Defendants Daniel E. Mobley, Chad L. Webb

Date of Offense On or about December 25, 2021

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did, in attempting or committing a theft offense, as defined in section 2913.01 and 2913.02 of the Revised Code, or in fleeing immediately after the attempt or offense upon Chris Vo did inflict, or attempt to inflict, serious physical harm on Chris Vo.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that
 the offender had a firearm on or about his person or under his control while committing the offense.

Firearm Specification - 3 year - §2941.145(A)

The Grand Jurors further find and specify that
 the offender had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the 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

Count 6 **Aggravated Robbery - F1**
 §2911.01(A)(1)

Defendants Daniel E. Mobley, Chad L. Webb

Date of Offense On or about December 25, 2021

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did, in attempting or committing a theft offense, as defined in section 2913.01 and 2913.02 of the Revised Code, or in fleeing immediately after the attempt or offense upon Chris Vo did have a deadly weapon, to wit: firearm and/or sword, on or about his person or under his control and either displayed the weapon, brandished it, indicated that he possessed it, or used it.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that
 the offender had a firearm on or about his person or under his control while committing the offense.

Firearm Specification - 3 year - §2941.145(A)

The Grand Jurors further find and specify that
 the offender had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the 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

Count 7 **Murder - UF**
 §2903.02(B)

Defendants Daniel E. Mobley, Chad L. Webb

Date of Offense On or about December 25, 2021

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did cause the death of Chris Vo, as a proximate result of the offender committing or attempting to commit an offense of violence that is a felony of the first or second degree, to wit: felonious assault, in violation of Section 2903.02 of the Revised Code.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that
 the offender had a firearm on or about his person or under his control while committing the offense.

Firearm Specification - 3 year - §2941.145(A)

The Grand Jurors further find and specify that
 the offender had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the 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.

Count 8 **Felonious Assault - F2**
 §2903.11(A)(1)

Defendants Daniel E. Mobley, Chad L. Webb

Date of Offense On or about December 25, 2021

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did knowingly cause serious physical harm to Chris Vo.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that
 the offender had a firearm on or about his person or under his control while committing the offense.

Firearm Specification - 3 year - §2941.145(A)

The Grand Jurors further find and specify that
 the offender had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the 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

Count 9 **Felonious Assault - F2**
 §2903.11(A)(2)

Defendants Daniel E. Mobley, Chad L. Webb

Date of Offense On or about December 25, 2021

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did knowingly cause or attempt to cause physical harm to Chris Vo by means of a deadly weapon or dangerous ordnance, to wit: handgun and/or sword,.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that
 the offender had a firearm on or about his person or under his control while committing the offense.

Firearm Specification - 3 year - §2941.145(A)

The Grand Jurors further find and specify that
 the offender had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the 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

Count 10 **Theft - F5**
 §2913.02(A)(1)

Defendants Daniel E. Mobley, Chad L. Webb

Date of Offense On or about December 25, 2021

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

did with purpose to deprive the owner, Chris Vo, of credit/debit card or services, knowingly obtain or exert control over either the property or services without the consent of the owner or person authorized to give consent and the property stolen is any of the property listed in section 2913.71 of the Revised Code, to wit: credit/debit card.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that

the offender had a firearm on or about his person or under his control while committing the offense.

Firearm Specification - 3 year - §2941.145(A)

The Grand Jurors further find and specify that

the offender had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

PNC Bank Visa Debit Card

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 **Receiving stolen property - F4**
 §2913.51(A)

Defendants Daniel E. Mobley, Chad L. Webb

Date of Offense On or about December 25, 2021 to December 26, 2021

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

did receive, retain, or dispose of 2019 Dodge Ram 2500 truck, the property of Ean Holdings, LLC, knowing or having reasonable cause to believe that the property had been obtained through commission of a theft offense and the property involved was a motor vehicle.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that

the offender had a firearm on or about his person or under his control while committing the 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

Count 12 **Receiving stolen property - F5**
 §2913.51(A)

Defendants Daniel E. Mobley, Chad L. Webb

Date of Offense On or about December 26, 2021

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

did receive, retain, or dispose of credit cards, the property of Kristen Bilka, knowing or having reasonable cause to believe that the property had been obtained through commission of a theft offense and the property involved was any of the property listed in section 2913.71 of the Revised Code, to wit: credit cards.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that

the offender had a firearm on or about his person or under his control while committing the offense.

US Bank Visa Card
 CITI Bank Visa Card
 Old Navy Visa Card
 American Express Card

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 **Identity Fraud - F5**
 §2913.49(B)(2)

Defendants Daniel E. Mobley

Date of Offense On or about December 26, 2021

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

did, without the express or implied consent of Maxwell Hill, use, obtain, or possess any personal identifying information of Maxwell Hill with intent to represent Maxwell Hill's personal identifying information as his own personal identifying information.

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 14 **Tampering With Evidence - F3**
 §2921.12(A)(1)

Defendants Chad L. Webb

Date of Offense On or about December 26, 2021

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

did, knowing that an official proceeding or investigation was in progress, or was about to be or likely to be instituted, alter, destroy, conceal, or remove any record, document, or thing, with purpose to impair its value or availability as evidence in such proceeding or investigation.

Hiding 9 live 32 caliber rounds and drug paraphernalia in police cruiser

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 15 **Trafficking - F2**
 §2925.03(A)(2)

Defendants Daniel E. Mobley, Chad L. Webb

Date of Offense On or about December 26, 2021

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

did knowingly prepare for shipment, ship, transport, deliver, prepare for distribution, or distribute a controlled substance or a controlled substance analog, when the offender knows or has reasonable cause to believe that the controlled substance or a controlled substance analog is intended for sale or resale by the offender or another person and the drug involved in the violation is any compound, mixture, preparation, or substance included in schedule I or Schedule II, to wit: Methamphetamine, a Schedule II drug and the amount of the drug involved equals or exceeds five times the bulk amount but is less than fifty times the bulk amount.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that

the offender had a firearm on or about his person or under his control while committing the 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

Count 16 **Drug Possession - F2**
 §2925.11(A)
Defendants Daniel E. Mobley, Chad L. Webb
Date of Offense On or about December 26, 2021

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did knowingly obtain, possess, or use a controlled substance or a controlled substance analog and the drug involved in the violation is a compound, mixture, preparation, or substance included in Schedule I or II, to wit: Methamphetamine, a Schedule II drug, and the amount of the drug involved equals or exceeds five times the bulk amount but is less than fifty times the bulk amount.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that
 the offender had a firearm on or about his person or under his control while committing the 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.

Count 17 **Drug Possession - F5**
 §2925.11(A)
Defendants Daniel E. Mobley, Chad L. Webb
Date of Offense On or about December 26, 2021

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did knowingly obtain, possess, or use a controlled substance or a controlled substance analog and the drug involved in the violation is a fentanyl-related compound and neither division (C)(9)(a) nor division (C)(10)(a) of this section applies to the drug involved, or is a compound, mixture, preparation, or substance that contains a fentanyl-related compound or is a combination of a fentanyl-related compound and any other controlled substance and neither division (C)(9)(a) nor division (C)(10)(a) of this section applies to the drug involved.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that
 the offender had a firearm on or about his person or under his control while committing the 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

Count 18 **Drug Possession - F5**
 §2925.11(A)

Defendants Daniel E. Mobley, Chad L. Webb

Date of Offense On or about December 26, 2021

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

did knowingly obtain, possess, or use a controlled substance or a controlled substance analog and the drug involved in the violation is a compound, mixture, preparation, or substance included in Schedule I or II, to wit: Lysergic Acid Diethylamide (LSD), a Schedule I drug, and the amount of the drug involved equals less than the bulk amount.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that

the offender had a firearm on or about his person or under his control while committing the 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.

Count 19 **Drug Possession - F5**
 §2925.11(A)

Defendants Daniel E. Mobley, Chad L. Webb

Date of Offense On or about December 26, 2021

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

did knowingly obtain, possess, or use a controlled substance or a controlled substance analog and the drug involved in the violation is a compound, mixture, preparation, or substance included in Schedule I or II, to wit: Alprazolam, a Schedule I drug, and the amount of the drug involved equals less than the bulk amount.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that

the offender had a firearm on or about his person or under his control while committing the 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

Count 20 **Possessing Criminal Tools - F5**
 §2923.24(A)

Defendants Daniel E. Mobley, Chad L. Webb

Date of Offense On or about December 26, 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: a scale, packaging equipment, syringes, 4 cell phones, butane, U.S. Currency and two firearms with purpose to use it criminally.

FURTHERMORE, the a scale, packaging equipment, syringes, 4 cell phones, butane, U.S. Currency and two firearms involved in the offense were intended for use in the commission of a felony, to wit: Revised Code Section 2925.03.

Firearm Specification - 1 year - §2941.141(A)

The Grand Jurors further find and specify that
the offender had a firearm on or about his person or under his control while committing the offense.

Forfeiture of a Cell Phone in a Drug Case - §2941.1417(A)

The Grand Jurors further find and specify that
the defendant(s) is the owner(s) and/or possessor(s) of four cell phones, which is contraband and/or property derived from or through the commission of an offense, and/or is an instrumentality the offender(s) used or intended to use in the commission of a felony, to-wit: said cell phone being used to communicate with customers, suppliers and co-traffickers and/or other persons involved in shipping and/or selling of drugs.

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 **Having Weapons Under Disability - F3**
 §2923.13(A)(3)

Defendants Daniel E. Mobley

Date of Offense On or about December 25, 2021 to December 26, 2021

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

did knowingly acquire, have, carry, or use any firearm or dangerous ordnance and he was under indictment for or has been convicted of a felony offense involving the illegal possession, use, sale, administration, distribution, or trafficking in any drug of abuse, to wit: the said Daniel E. Mobley, on or about October 6, 2021, in the Court of Common Pleas, Cuyahoga County, Ohio, Case No. CR-20-652644, having been indicted for or convicted of the crime of Attempted Drug Trafficking, in violation of Revised Code Section 2923.02/2925.03 of the State of Ohio.

Forfeiture of a Weapon - §2941.1417(A)

The Grand Jurors further find and specify that

the defendant(s) is/are the owner(s) and/or possessor(s) of Kel Tec P3AT .380 pistol, #8780, 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.

Forfeiture of a Weapon - §2941.1417(A)

The Grand Jurors further find and specify that

the defendant(s) is/are the owner(s) and/or possessor(s) of Iver Johnson's Arms and Cycle Works .32 revolver, #77816, 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

Count 22 **Having Weapons Under Disability - F3**
 §2923.13(A)(2)

Defendants Chad L. Webb

Date of Offense On or about December 25, 2021 to December 26, 2021

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

did knowingly acquire, have, carry, or use any firearm or dangerous ordnance and he was under indictment for or has been convicted of any felony offense of violence, to wit: the said Chad L. Webb, on or about February 9, 2018, in the Court of Common Pleas, Franklin County, Ohio, Case No. 17CR314, having been indicted for or convicted of the crime of Robbery (F3), in violation of Revised Code Section 2911.02(A)(3) of the State of Ohio.

Forfeiture of a Weapon - §2941.1417(A)

The Grand Jurors further find and specify that

the defendant(s) is/are the owner(s) and/or possessor(s) of Kel Tec P3AT .380 pistol, #8780, 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.

Forfeiture of a Weapon - §2941.1417(A)

The Grand Jurors further find and specify that

the defendant(s) is/are the owner(s) and/or possessor(s) of Iver Johnson's Arms and Cycle Works .32 revolver, #77816, 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