

IN THE COURT OF COMMON PLEAS
OF TRUMBULL COUNTY, OHIO

ENZO C. CANTALAMESSA, Law Director)	Case No. _____
For the City of Warren, Ohio)	
391 Mahoning Avenue, N.W.)	
Warren, Ohio 44483)	Judge:
Plaintiff)	
vs.)	COMPLAINT FOR PERMANENT
VIRGOL BALL)	INJUNCTIVE RELIEF
762 Fourth Street SW)	
Warren, Ohio 44483)	
Defendant)	

Now comes the Plaintiff, ENZO C. CANTALAMESSA, as the Law Director for the City of Warren, Ohio, on behalf of the State of Ohio, Trumbull County, and the City of Warren and its citizens, by setting forth and stating the following as his Complaint against the Defendant, VIRGOL BALL.

PARTIES

1. Plaintiff, ENZO C. CANTALAMESSA, pursuant to O.R.C. Chapter 733, et seq., is the duly elected Law Director for the City of Warren, Ohio, and as such has authority to enforce the laws of the State of Ohio in the jurisdiction where Defendant, VIRGOL BALL, resides.
2. Defendant, VIRGOL BALL, is a natural person who currently resides at and/or is occupying residential premises located at 762 Fourth Street, SW, Warren, Ohio 44483, within Warren, Ohio.
3. This address is located within one thousand feet (1,000') of school premises, specifically Jefferson Elementary School PK-8, 1543 Tod Avenue, SW, Warren, Ohio 44485.

JURISDICTION, VENUE AND STANDING

4. This Complaint is brought pursuant to the residency restrictions pertaining to non-registration exempt sexually oriented offenders and/or child-victim oriented offenders under O.R.C. 2950.031, et seq.
5. This Court has subject matter jurisdiction to enjoin violations of the residency restriction under O.R.C. 2950.031, et seq.
6. Venue is proper in this Court because the Defendant, VIRGOL BALL, resides in, or is occupying residential premises at 762 Fourth St., SW, Warren, Ohio 44483, which residential premises is located in the City of Warren, Trumbull County, Ohio.
7. Plaintiff, ENZO C. CANTALAMESSA, individually and as the Law Director for the City of Warren, has proper legal standing and full legal authority to proceed with this lawsuit and to file this Complaint pursuant to O.R.C. 2950.031, et. seq.

CAUSES OF ACTION

8. In support of this Complaint, Plaintiff has attached hereto and incorporated herein Exhibit "A", which is the Affidavit of Deputy Russ Molinatto, of the Trumbull County Sheriff's Department, Sexual Offender Registration and Notification (SORN) Division.
9. Defendant, VIRGOL BALL, was convicted on October 22, 2025, of one count of Importuning (F5) ORC: 2907.07 (B)(1)&(G)(1)& (3) one count Attempted Illegal Use of Minor in Nudity Oriented Material or Performance (F3) ORC: 2923.02 (A)&(E) and 2907.323 (A)(1)&(B), three counts of Disseminating Matter Harmful to Juveniles (F5) ORC: 2907.31 (A)(1)&(F) and two counts Unlawful Sexual Conduct with a Minor (F4) ORC: 2907.04 (A)&(B)(1) in Trumbull County Common Pleas Court and is required to register as a Tier II Sexual Offender.
10. These offenses are child-victim-oriented offenses and/or sexually oriented offenses that are not registration-exempt sexually oriented offenses under Ohio law.
11. Defendant, VIRGOL BALL, is classified and designated as a sexually oriented offender and/or child-victim predator.
12. Classification as a sexual/child-victim predator reflects the determination of the sentencing court that the individual is likely to engage in the future in one or more sexually oriented/child-victim oriented offenses, as provided for in O.R.C. 2950.01(E) and 2950.09, et. seq.
13. "Residential premises" and "school premises" are defined in O.R.C. 2950.01 (W), and O.R.C. 2925.01 (R), respectively.

14. As a person convicted of a sexually oriented offense that is not a registration-exempt offense, or a child-victim oriented offense, Defendant, VIRGOL BALL, is prohibited from establishing a residence or occupying residential premises within one thousand feet (1,000') of any school premises, as provided for in O.R.C. 2950.031, et. seq.

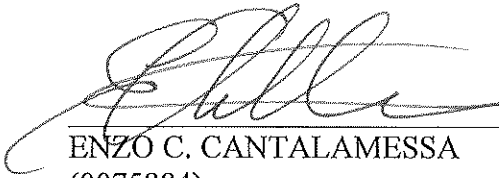
15. Defendant, VIRGOL BALL, occupation of, or establishment of a residence at his current address is a violation of the residency restrictions of O.R.C. 2950.031, et. seq., and subject to an injunction by this Court under the provisions of that statute.

WHEREFORE, the State of Ohio, by and through Enzo C. Cantalamessa, as Law Director of the City of Warren, requests judgment in favor of the Plaintiff, providing for the following relief:

- A. Permanent injunctive relief enjoining Defendant, VIRGOL BALL, from continuing to occupy or reside at the residential premises located at 762 Fourth Street, SW, Warren, Ohio 44483.
- B. Permanent injunctive relief enjoining Defendant, VIRGOL BALL, from residing or occupying any residential premises within one thousand feet (1,000') of any school premises.
- C. An Order notifying Defendant, VIRGOL BALL, that if he establishes a residence and/or occupies a residential premise within one thousand feet (1,000') of any school premises, as defined under Ohio law, he shall be in violation of a Court Order, held in Contempt of Court, fined and/or incarcerated.
- D. An award of attorney's fees, court costs, pursuant to this action to enforce the residency restriction; and

E. Any other relief that this Court deems just and proper.

Respectfully submitted,



ENZO C. CANTALAMESSA
(0075884)

Law Director for the City of Warren
391 Mahoning Avenue, N.W.
Warren, Ohio 44483
Phone: (330) 841-2605
enzolaw@warren.org




JAMES E. SANDERS
(0022033)

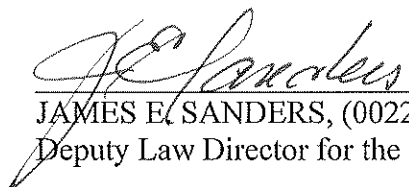
Deputy Law Director for the
City of Warren
391 Mahoning Avenue, N.W.
Warren, Ohio 44483
Phone: (330) 841-2605
jsanders@warren.org
jsanders@lawturner.com

NOTICE OF HEARING

All parties shall take Notice that the foregoing Complaint shall be heard on the _____ day of _____, 20____, at _____ .m., or as soon thereafter as the Court may conveniently hear the same.



ENZO C. CANTALAMESSA (0075884)
Law Director for the City of Warren




JAMES E. SANDERS, (0022033)
Deputy Law Director for the City of Warren

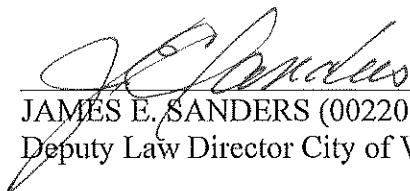
INSTRUCTIONS FOR SERVICE

To the Clerk of Courts:

Please issue summons, together with a certified copy of the foregoing Complaint directed to the Defendant, VIRGOL BALL, at the residence set forth in the Complaint by personal service to Manny Nites at Rocket Serve, LLC, process server, and make the same returnable according to law.



ENZO C. CANTALAMESSA, (0075884)
Law Director for the City of Warren



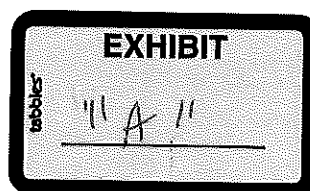
JAMES E. SANDERS (0022033)
Deputy Law Director City of Warren

STATE OF OHIO

COUNTY OF TRUMBULL Ss:

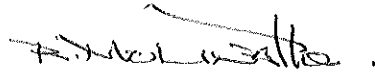
Affiant being first duly sworn according to law, for his AFFIDAVIT states:

1. That his name is Russell Molinatto and he is a Deputy with the Trumbull County Sheriff's Office.
2. The Affiant has been a Deputy for seventeen (17) years. Deputy Molinatto joined the Trumbull County Sheriff's Office in 1989 As a Corrections Officer. He was promoted to Assistant Warden in 1999, and then to the position of Deputy in 2008. He is currently assigned to the Sexual Offender Registration and Notification (SORN) Division.
3. On October 22, 2025 Virgol Ball was convicted one count Importuning (F5) ORC: 2907.07 (B)(1)&(G)(1)&(3) one count Attempted Illegal Use of Minor in Nudity Oriented Material or Performance (F3) ORC: 2923.02(A)&(E) and 2907.323(A)(1)&(B) three counts Disseminating Matter Harmful to Juveniles (F5) ORC: 2907.31(A)(1)&(F) and two counts Unlawful Sexual Conduct with a Minor (F4) ORC: 2907.04(A)&(B)(1) in Trumbull County Common Pleas Court and is required to register as a Tier II Sex Offender
4. On October 24,2025, Defendant registered an address of 762 Forth St SW Warren Oh. 44483 with the SORN Division of the Trumbull County Sheriff's Office.
5. On October 27, 2025, Deputy David Hoover went to the premises and verified that Defendant is residing at the reported address.



6. This Affiant contacted Trumbull County Tax Map Department to determine the distance from this residence to Jefferson Elementary School 1543 Tod Ave SW Warren OH. 44485.
7. Jefferson Elementary School is a “school property” as defined in R.C. 2925.01.
8. Trumbull County Tax Map Department calculated the distance from the “school property” as defined in R.C. 2925.01 to Defendant’s as 527 (Five-hundred-twenty-seven) feet.
9. For the reasons set forth above, Affiant believes that Virgol Ball, a registered sex offender is residing within 1,000 feet of school property in violation of R.C. 2950.031.

FURTHER AFFIANT SAYETH NAUGHT.



Deputy Russ Molinatto
Trumbull County Sheriff’s Office
SORN Division

SWORN to before me and SUBSCRIBED in my presence this

17th day of November, 2025.


NOTARY PUBLIC

VANESSA M LYTLE
Notary Public
State of Ohio
My Comm. Expires
October 18, 2026