IN THE CIRCUIT COURT FOR BALTIMORE COUNTY

STATE OF MARYLAND

v.

DAQUAN JOHNSON

Maryland Reception, Diagnostic, and Classification Center 550 E. Madison Street
Baltimore, MD 21202
DOB: 1/16/2000
SID # 3938611

Tracking Number: 18-7003-00033-2

(TRUE BILL)

GRAND JURY FOREPERSON

FILED: AUGUST 6, 2018

CHARGES:

Conspiracy – Carjacking Ring (Common Law; Maryland Criminal Law Article §3-405)

Participation in Gang (Maryland Criminal Law Article § 9-804(a))

Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104)

Unauthorized Use (Maryland Criminal Law Article § 7-203)

Rogue and Vagabond (Maryland Criminal Law Article § 6-206(b))

Carjacking (Maryland Criminal Law Article § 3-405(b))

Robbery (Maryland Criminal Law Article § 3-402)

Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)

Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104)

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Unauthorized Use (Maryland Criminal Law Article § 7-203)

Rogue and Vagabond (Maryland Criminal Law Article § 6-206(b))

Armed Carjacking (Maryland Criminal Law Article §3-405(c))

Carjacking (Maryland Criminal Law Article § 3-405(b))

Armed Robbery (Maryland Criminal Law Article §3-403)

Robbery (Maryland Criminal Law Article § 3-402)

Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)

Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104)

Armed Carjacking (Maryland Criminal Law Article §3-405(c))

Carjacking (Maryland Criminal Law Article § 3-405(b))

Armed Robbery (Maryland Criminal Law Article §3-403)

Robbery (Maryland Criminal Law Article § 3-402)

Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)

Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104)

Armed Carjacking (Maryland Criminal Law Article §3-405(c))

Carjacking (Maryland Criminal Law Article § 3-405(b))

Armed Robbery (Maryland Criminal Law Article §3-403)

Armed Robbery (Maryland Criminal Law Article §3-403)

Robbery (Maryland Criminal Law Article § 3-402)

Robbery (Maryland Criminal Law Article § 3-402)

Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)

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Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104)

Armed Cariacking (Maryland Criminal Law Article §3-405(c))

Carjacking (Maryland Criminal Law Article § 3-405(b))

Armed Robbery (Maryland Criminal Law Article §3-403)

Robbery (Maryland Criminal Law Article § 3-402)

Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)

Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104)

Theft Scheme - Over \$100,000 (Maryland Criminal Law Article § 7-104)

WITNESSES:

Special Agent John Krajnak Federal Bureau of Investigation

Detective Steve Mahan Baltimore City Police Department

Detective Philip Crumbacker Baltimore County Police Department

CO-DEFENDANTS:

State of Marylai	nd
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 $\mathbf{v}_{\boldsymbol{\cdot}}$

Dalante GRAHAM	Case no.	
Tyheim GRAY	Case no.	
Daquan JOHNSON	Case no.	
Travon WILLIAMSTON	Case no.	

STATE OF MARYLAND

- * IN THE
- v. * CIRCUIT COURT
- **DAQUAN JOHNSON**

* FOR BALTIMORE COUNTY

Defendant

CASE NO:

INDICTMENT

The Grand Jurors for the State of Maryland for Baltimore County charge:

COUNT ONE

(CONSPIRACY – CARJACKING RING)

The Jurors of the State of Maryland for the body of Baltimore County, do on their oath present that, beginning in September 2017 through the present day, in Baltimore County and the City of Baltimore, the Defendant, Daquan JOHNSON, along with others known and unknown to the Jurors, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree to form an Enterprise whose objective was to take possession of multiple motor vehicles and assorted personal property of different owners, accomplishing this objective by criminal means including acts of violence, unlawful use of weapons, and theft in violation of the common law of Maryland against the peace, government, and dignity of the State.

Background

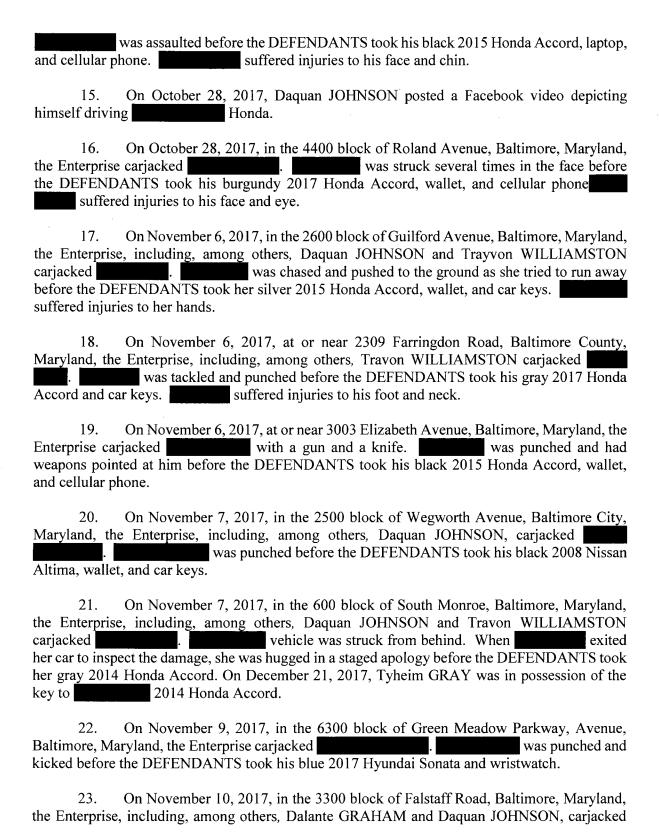
- 1. The members of the Enterprise are a group of associates, many of whom hail from the same section of the City of Baltimore. Two of the members, Moya PITTMAN and Dalante GRAHAM, are half-brothers.
- 2. Members of the Enterprise not only socialize with each other and many of the same individuals in and around the city of Baltimore, but also are friends with each other and many of the same individuals on social media, particularly Facebook, which they frequently use to communicate with each other.
- 3. The members of the Enterprise pride themselves on "draggin" or "cuttin," which is slang for doing as they feel without concern for repercussions.

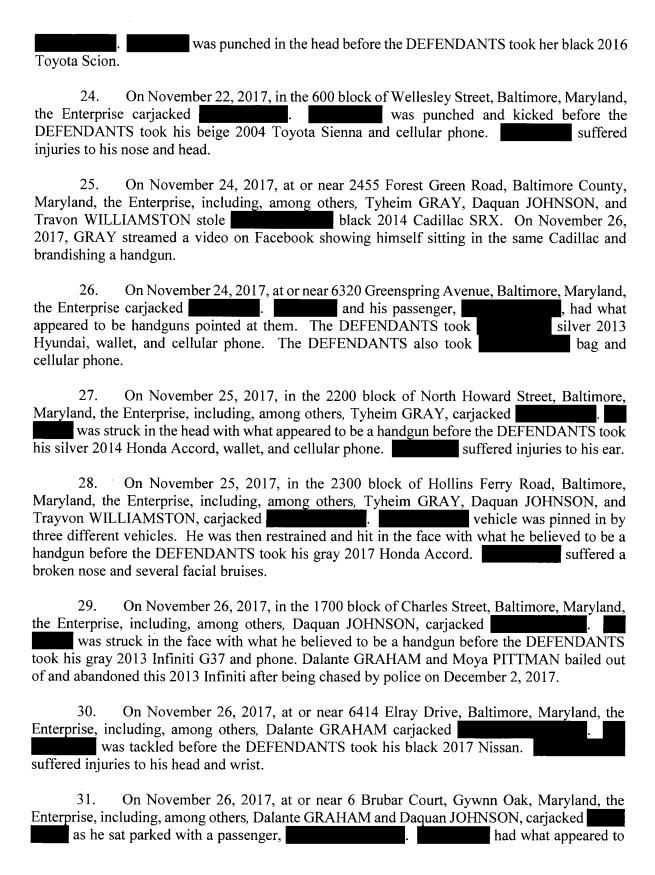
Manner, Means, and Methods of the Conspiracy

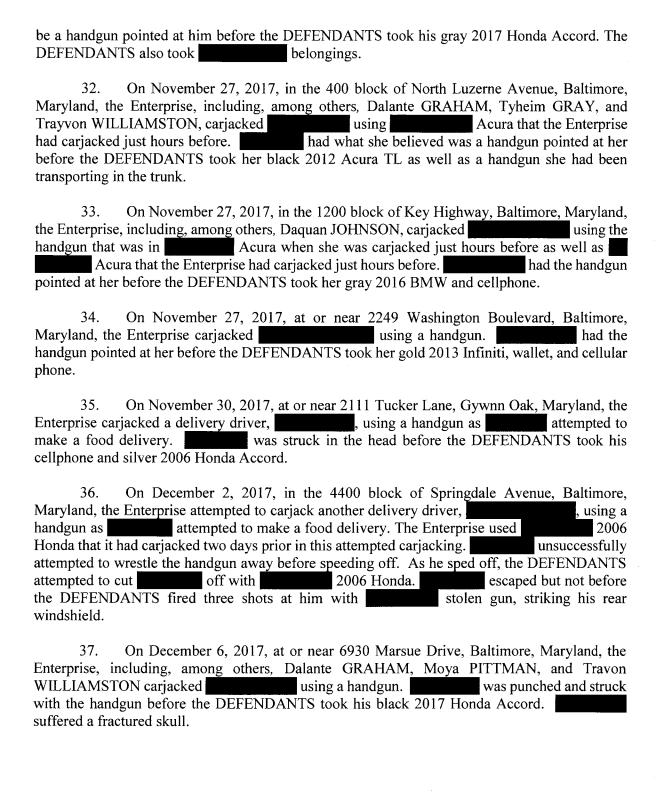
- 4. Members and associates of the Enterprise utilized weapons, such as pellet guns, knives, and handguns in order to commit carjackings and auto thefts.
- 5. Members and associates of the Enterprise utilized unnecessary violence, often continuing to assault the victim after the Members or associates had control of the victim's vehicle.
- 6. Members and associates of the Enterprise would intentionally cause superficial vehicle accidents with their victims on the streets of Baltimore County and the City of Baltimore. Then, while feigning a normal exchange of information, the Members would attack the victim and drive away in both the victim's vehicle and the striking vehicle.
- 7. Members and associates of the Enterprise often targeted victims as they parked, and sometimes even as the victims were walking to or from their homes.
- 8. Members and associates victimized the same victims more than once. Specifically, the Members would use stolen keys to other vehicles that they obtained during an initial carjacking or theft to go and steal the other vehicles operated by the stolen keys.
- 9. Members and associates of the Enterprise often documented themselves "joyriding" in the stolen vehicles, posting videos and photos on their social media accounts.
- 10. Members and associates of the Enterprise wore key fobs on their belts taken from their victims as "trophies" to demonstrate the cars that they had stolen.

Overt Acts in Furtherance of the Conspiracy

- 11. In furtherance of the conspiracy and to achieve the objectives thereof, Dalante GRAHAM, Tyheim GRAY, Daquan JOHNSON, Travon WILLIAMSTON, and others known and unknown, (hereinafter "the DEFENDANTS"), performed and caused to be performed the following acts, among others, in and throughout Maryland, including in Baltimore City and Baltimore County, and elsewhere:
- 12. On September 13, 2017, at or near 2455 Forest Green Rd. Baltimore County, Maryland, the Enterprise, including, among others, Dalante GRAHAM and Tyheim GRAY stole black 2014 Cadillac SRX.
- 13. On October 9, 2017, in the 5200 block of Gwynn Oak Avenue, Baltimore, Maryland, the Enterprise carjacked was struck in the back of head before the DEFENDANTS took his silver 2005 Honda Accord, wallet, and cellular phone.
- 14. On October 27, 2017, at or near 2701 Jeremy Court, Baltimore, Maryland, the Enterprise, including, among others, Moya PITTMAN, carjacked using a knife.







38. On December 7, 2017, at or near 1633 Waverly Way, Baltimore, Maryland, the Enterprise, including, among others, Dalante GRAHAM, Tyheim GRAY, and Moya PITTMAN, stole white 2008 Honda Accord.

[Common Law]
Misdemeanor
Any sentence that is not cruel or unusual punishment

<u>COUNT TWO</u> (PARTICIPATION IN A CRIMINAL GANG)

The Jurors of the State of Maryland for the body of Baltimore County, do on their oath present that, since at least as early as September 2017 through the present day, in Baltimore County and Baltimore City, the Defendant, Daquan JOHNSON, did participate in a criminal gang, the aforementioned Enterprise, knowing that the members of said gang engage in criminal gang activity and knowingly and willfully participated in an underlying crime committed in association with a criminal gang, in violation of the Criminal Law Article, Section 9-804, of the Maryland Code against the peace, government, and dignity of the State.

Note: the background, manner, means, methods, use of violence, and additional overt acts listed in Count 1 above are incorporated by reference herein.

[CR 9-804] CJIS 1-1394 Felony 15 years - \$1,000,000

<u>Count Three</u> (Theft \$1,500 - \$25,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about October 27, 2017, at or near 2701 Jeremy Court, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did steal a black 2015 Honda Accord, and contents therein, of having a value of at least \$1,500 but less than \$25,000, in violation of the Criminal Law Article, Section 7-104, of the Maryland Code against the peace, government and dignity of the State.

COUNT FOUR

(UNAUTHORIZED USE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about October 27, 2017, at or near 2701 Jeremy Court, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did without permission, take and carry away out of the possession of a black 2015 Honda Accord, with the intent to temporarily deprive of the use and possession of said property, in violation of the Criminal Law Article, Section 7-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 7-203] CJIS Code 2-2411 Misdemeanor 4 years – \$100

COUNT FIVE

(ROGUE AND VAGABOND)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about October 27, 2017, at or near 2701 Jeremy Court, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, was in the motor vehicle of with the intent to commit theft of the vehicle, in violation of the Criminal Law Article, Section 6-206, of the Maryland Code against the peace, government and dignity of the State.

[CR 6-206] CJIS Code 2-3090 Misdemeanor 3 years

COUNT SIX (CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 6, 2017, at or near the 2600 block of Guilford Avenue, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did obtain unauthorized possession of a motor vehicle, to wit: a silver 2015 Honda Accord, from who was then and there in actual possession of the motor vehicle, by force, in violation of the Criminal Law Article, Section 3-405, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-405] CJIS Code 1-0825 Felony 30 years

COUNT SEVEN (ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 6, 2017, at or near the 2600 block of Guilford Avenue, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did unlawfully and feloniously rob of personal property, in violation of the Criminal Law Article, Section 3-402, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-402] CJIS Code 2-0700 Felony 15 years

COUNT EIGHT

(ASSAULT – SECOND DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 6, 2017, at or near the 2600 block of Guilford Avenue, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did assault in the second degree, in violation of the Criminal Law Article, Section 3-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-203] CJIS Code 1-1415 Misdemeanor 10 years / \$2,500

<u>Count Nine</u> (Theft \$1,500 - \$25,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 6, 2017, at or near the 2600 block of Guilford Ave., Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did steal a silver 2015 Honda Accord, and contents therein, of having a value of at least \$1,500 but less than \$25,000, in violation of the Criminal Law Article, Section 7-104, of the Maryland Code against the peace, government and dignity of the State.

<u>Count Ten</u> (Theft \$1,500 - \$25,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 6, 2017, at or near 3003 Elizabeth Avenue, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did steal a black 2015 Honda Accord, and contents therein, of having a value of at least \$1,500 but less than \$25,000, in violation of the Criminal Law Article, Section 7-104, of the Maryland Code against the peace, government and dignity of the State.

[CR 7-104] CJIS Code 1-1136 Felony 5 years – \$10,000

<u>Count Eleven</u> (Unauthorized Use)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 6, 2017, at or near 3003 Elizabeth Avenue, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did without permission, take and carry away out of the possession of a black 2015 Honda Accord, with the intent to temporarily of the use and possession of said property, in violation of the Criminal Law Article, Section 7-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 7-203] CJIS Code 2-2411 Misdemeanor 4 years – \$100

<u>COUNT TWELVE</u> (ROGUE AND VAGABOND)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 27, 2017, at or near the 2249 Washington Boulevard, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, was in the motor vehicle of with the intent to commit theft of the vehicle, in violation of the Criminal Law Article, Section 6-206, of the Maryland Code against the peace, government and dignity of the State.

[CR 6-206] CJIS Code 2-3090 Misdemeanor 3 years

COUNT THIRTEEN

(CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 7, 2017, at or near the 2500 block of Wegworth Lane, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2008 Nissan Altima, from who was then and there in actual possession of the motor vehicle, by violence, in violation of the Criminal Law Article, Section 3-405, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-405] CJIS Code 1-0825 Felony 30 years

COUNT FOURTEEN

(ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 7, 2017, at or near the 2500 block of Wegworth Lane, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did unlawfully and feloniously rob of personal property, in violation of the Criminal Law Article, Section 3-402, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-402] CJIS Code 2-0700 Felony 15 years

COUNT FIFTEEN

(ASSAULT – SECOND DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 7, 2017, at or near the 2500 block of Wegworth Lane, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did assault in the second degree, in violation of the Criminal Law Article, Section 3-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-203] CJIS Code 1-1415 Misdemeanor 10 years / \$2,500

<u>Count Sixteen</u> (THEFT \$1,500 - \$25,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 7, 2017, at or near the 2500 block of Wegworth Lane, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did steal a gray 2008 Nissan Altima, and contents therein, of having a value of at least \$1,500 but less than \$25,000, in violation of the Criminal Law Article, Section 7-104, of the Maryland Code against the peace, government and dignity of the State.

[CR 7-104] CJIS Code 1-1136 Felony 5 years – \$10,000

COUNT SEVENTEEN

(CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 7, 2017, at or near the 600 block of South Monroe Street, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2014 Honda Accord, from who was then and there in actual possession of the motor vehicle, by force, in violation of the Criminal Law Article, Section 3-405, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-405] CJIS Code 1-0825 Felony 30 years

COUNT EIGHTEEN (ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 7, 2017, at or near the 600 block of South Monroe Street, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did unlawfully and feloniously rob of personal property, in violation of the Criminal Law Article, Section 3-402, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-402] CJIS Code 2-0700 Felony 15 years

COUNT NINETEEN

(ASSAULT – SECOND DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 7, 2017, at or near the 600 block of South Monroe Street, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did assault in the second degree, in violation of the Criminal Law Article, Section 3-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-203] CJIS Code 1-1415 Misdemeanor 10 years / \$2,500

COUNT TWENTY (THEFT \$1,500 - \$25,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 7, 2017, at or near the 600 block of South Monroe Street, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did steal a gray 2014 Honda Accord, and contents therein, of having a value of at least \$1,500 but less than \$25,000, in violation of the Criminal Law Article, Section 7-104, of the Maryland Code against the peace, government and dignity of the State.

[CR 7-104] CJIS Code 1-1136 Felony 5 years – \$10,000

COUNT TWENTY-ONE

(CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 10, 2017, at or near the 3300 block of Fallstaff Road, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did obtain unauthorized possession of a motor vehicle, to wit: a black 2016 Toyota Scion, from who was then and there in actual possession of the motor vehicle, by violence, in violation of the Criminal Law Article, Section 3-405, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-405] CJIS Code 1-0825 Felony 30 years

COUNT TWENTY-TWO

(ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 10, 2017, at or near the 3300 block of Fallstaff Road, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did unlawfully and feloniously rob of personal property, in violation of the Criminal Law Article, Section 3-402, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-402] CJIS Code 2-0700 Felony 15 years

COUNT TWENTY-THREE

(ASSAULT - SECOND DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 10, 2017, at or near the 3300 block of Fallstaff Road, Baltimore, Maryland, the Defendant, Daquan JOHNSON, did assault in the second degree, in violation of the Criminal Law Article, Section 3-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-203] CJIS Code 1-1415 Misdemeanor 10 years / \$2,500

COUNT TWENTY-FOUR

(THEFT \$1,500 - \$25,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 10, 2017, at or near the 3300 block of Fallstaff Road, Baltimore Maryland, the Defendant, Daquan JOHNSON, did steal a black 2016 Toyota Scion, and contents therein, of having a value of at least \$1,500 but less than \$25,000, in violation of the Criminal Law Article, Section 7-104, of the Maryland Code against the peace, government and dignity of the State.

<u>Count Twenty-Five</u> (Theft \$1,500 – \$25,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 24, 2017, at or near 2455 Forrest Green Road, Baltimore County, Maryland, the Defendant, Daquan JOHNSON, did steal a black 2014 Cadillac SRX, and contents therein, of having a value of at least \$1,500 but less than \$25,000, in violation of the Criminal Law Article, Section 7-104, of the Maryland Code against the peace, government and dignity of the State.

[CR 7-104] CJIS Code 1-1136 Felony 5 years – \$10,000

COUNT TWENTY-SIX (UNAUTHORIZED USE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 24, 2017, at or near 2455 Forrest Green Road, Baltimore County, Maryland, the Defendant, Daquan JOHNSON, did without permission, take and carry away out of the possession of a black 2014 Cadillac SRX, with the intent to temporarily deprive of the use and possession of said property, in violation of the Criminal Law Article, Section 7-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 7-203] CJIS Code 2-2411 Misdemeanor 4 years – \$100

COUNT TWENTY-SEVEN (ROGUE AND VAGABOND)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 24, 2017, at or near the 2455 Forrest Green Road, Baltimore County, Maryland, the Defendant, Daquan JOHNSON, was in the motor vehicle of with the intent to commit theft of the vehicle, in violation of the Criminal Law Article, Section 6-206, of the Maryland Code against the peace, government and dignity of the State.

[CR 6-206] CJIS Code 2-3090 Misdemeanor 3 years

COUNT TWENTY-EIGHT

(ARMED CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 25, 2017, at or near the 2300 block of Hollins Ferry Road, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2017 Honda Accord, from who was then and there in actual possession of the motor vehicle by violence and displaying a dangerous weapon during the commission of the carjacking, in violation of the Criminal Law Article, Section 3-405, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-405] CJIS Code 1-0826 Felony 30 years

COUNT TWENTY-NINE

(CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 25, 2017, at or near the 2300 block of Hollins Ferry Road, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2017 Honda Accord, from who was then and there in actual possession of the motor vehicle, by violence, in violation of the Criminal Law Article, Section 3-405, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-405] CJIS Code 1-0825 Felony 30 years

COUNT THIRTY

(ARMED ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 25, 2017, at or near the 2300 block of Hollins Ferry Road, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did unlawfully and feloniously, with a dangerous weapon, rob and violently did steal from said person personal property in violation of the Criminal Law Article, Section 3-403, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-403] CJIS Code 2-0705 Felony 20 years

COUNT THIRTY-ONE

(ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 25, 2017, at or near the 2300 block of Hollins Ferry Road, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did unlawfully and feloniously rob of personal property, in violation of the Criminal Law Article, Section 3-402, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-402] CJIS Code 2-0700 Felony 15 years

COUNT THIRTY-TWO

(ASSAULT – SECOND DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 25, 2017, at or near the 2300 block of Hollins Ferry Road, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did assault in the second degree in violation of the Criminal Law Article, Section 3-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-203] CJIS Code 1-1415

Misdemeanor

10 years – \$2,500

<u>COUNT THIRTY-THREE</u> (THEFT \$1,500 – \$25,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 25, 2017, at or near the 2300 block of Hollins Ferry Road, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did steal a gray 2017 Honda Accord, and contents therein, of having a value of at least \$1,500 but less than \$25,000, in violation of the Criminal Law Article, Section 7-104, of the Maryland Code against the peace, government and dignity of the State.

COUNT THIRTY-FOUR

(ARMED CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at or near the 1700 block of South Charles Street, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2013 Infiniti G37, from who was then and there in actual possession of the motor vehicle by violence and displaying a dangerous weapon during the commission of the carjacking, in violation of the Criminal Law Article, Section 3-405, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-405] CJIS Code 1-0826 Felony 30 years

COUNT THIRTY-FIVE

(CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at or near the 1700 block of South Charles Street, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did obtain unauthorized possession of a motor vehicle, to wit a gray 2013 Infiniti G37, from who was then and there in actual possession of the motor vehicle, by violence, in violation of the Criminal Law Article, Section 3-405, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-405] CJIS Code 1-0825 Felony 30 years

COUNT THIRTY-SIX

(ARMED ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at or near the 1700 block of South Charles Street, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did unlawfully and feloniously, with a dangerous weapon, rob and violently did steal from said person personal property in violation of the Criminal Law Article, Section 3-403, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-403] CJIS Code 2-0705 Felony 20 years

COUNT THIRTY-SEVEN

(ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at or near the 1700 block of South Charles Street, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did unlawfully and feloniously rob of personal property, in violation of the Criminal Law Article, Section 3-402, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-402] CJIS Code 2-0700 Felony 15 years

COUNT THIRTY-EIGHT

(ASSAULT – SECOND DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at or near the 1700 block of South Charles Street, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did assault in the second degree in violation of the Criminal Law Article, Section 3-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-203] CJIS Code 1-1415

Misdemeanor
10 years – \$2,500

<u>Count Thirty-Nine</u> (Theft \$1,500 – \$25,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at or near the 1700 block of South Charles Street, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did steal a gray 2013 Infiniti G37, and contents therein, of having a value of at least \$1,500 but less than \$25,000, in violation of the Criminal Law Article, Section 7-104, of the Maryland Code against the peace, government and dignity of the State.

COUNT FORTY (ARMED CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at 6 Brubar Court, Baltimore County, Maryland, the Defendant, Daquan JOHNSON, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2010 Acura TL from who was then and there in actual possession of the motor vehicle by threat of violence and displaying a dangerous weapon during the commission of the carjacking, in violation of the Criminal Law Article, Section 3-405, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-405] CJIS Code 1-0826 Felony 30 years

COUNT FORTY-ONE

(CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at 6 Brubar Court, Baltimore County, Maryland, the Defendant, Daquan JOHNSON, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2010 Acura TL, from who was then and there in actual possession of the motor vehicle, by threat of violence, in violation of the Criminal Law Article, Section 3-405, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-405] CJIS Code 1-0825 Felony 30 years

COUNT FORTY-TWO (ARMED ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at or near 6 Brubar Court, Baltimore County, Maryland, the Defendant, Daquan JOHNSON, did unlawfully and feloniously, with a dangerous

weapon, rob and violently did steal from said person personal property in violation of the Criminal Law Article, Section 3-403, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-403] CJIS Code 2-0705 Felony 20 years

COUNT FORTY-THREE

(ARMED ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at or near 6 Brubar Court, Baltimore County, Maryland, the Defendant, Daquan JOHNSON, did unlawfully and feloniously, with a dangerous weapon, rob and violently did steal from said person personal property in violation of the Criminal Law Article, Section 3-403, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-403] CJIS Code 2-0705 Felony 20 years

COUNT FORTY-FOUR

(ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at or near 6 Brubar Court, Baltimore County, Maryland, the Defendant, Daquan JOHNSON, did unlawfully and feloniously rob of personal property, in violation of the Criminal Law Article, Section 3-402, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-402] CJIS Code 2-0700 Felony 15 years

COUNT FORTY-FIVE

(ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at or near 6 Brubar Court, Baltimore County, Maryland, the Defendant, Daquan JOHNSON, did unlawfully and feloniously rob of personal property, in violation of the Criminal Law Article, Section 3-402, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-402] CJIS Code 2-0700 Felony 15 years

COUNT FORTY-SIX

(ASSAULT – SECOND DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at or near 6 Brubar Court, Baltimore County, Maryland, the Defendant, Daquan JOHNSON, did assault in the second degree in violation of the Criminal Law Article, Section 3-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-203] CJIS Code 1-1415

Misdemeanor
10 years – \$2,500

COUNT FORTY-SEVEN

(ASSAULT – SECOND DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at or near 6 Brubar Court, Baltimore County, Maryland, the Defendant, Daquan JOHNSON, did assault in the second degree in violation of the Criminal Law Article, Section 3-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-203] CJIS Code 1-1415

Misdemeanor

10 years — \$2,500

COUNT FORTY-EIGHT

(THEFT \$1,500 - \$25,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 26, 2017, at or near 6 Brubar Court, Baltimore County, Maryland, the Defendant, Daquan JOHNSON, did steal a gray 2010 Acura TL, and contents therein, of having a value of at least \$1,500 but less than \$25,000, in violation of the Criminal Law Article, Section 7-104, of the Maryland Code against the peace, government and dignity of the State.

COUNT FORTY-NINE (ARMED CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 27, 2017, at or near the 1200 block of Key Highway, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2016 BMW, from who was then and there in actual possession of the motor vehicle by force and displaying a dangerous weapon during the commission of the carjacking, in violation of the Criminal Law Article, Section 3-405, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-405] CJIS Code 1-0826 Felony 30 years

COUNT FIFTY (CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 27, 2017, at or near the 1200 block of Key Highway, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2016 BMW, from who was then and there in actual possession of the motor vehicle, by force, in violation of the Criminal Law Article, Section 3-405, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-405] CJIS Code 1-0825 Felony 30 years

COUNT FIFTY-ONE (ARMED ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 27, 2017, at or near the 1200 block of Key Highway, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did unlawfully and feloniously, with a dangerous weapon, rob and violently did steal from said person personal property in violation of the Criminal Law Article, Section 3-403, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-403] CJIS Code 2-0705 Felony 20 years

COUNT FIFTY-TWO

(ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 27, 2017, at or near the 1200 block of Key Highway, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did unlawfully and feloniously rob of personal property, in violation of the Criminal Law Article, Section 3-402, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-402] CJIS Code 2-0700 Felony 15 years

COUNT FIFTY-THREE

(ASSAULT – SECOND DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 27, 2017, at or near the 1200 block of Key Highway, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did assault in the second degree in violation of the Criminal Law Article, Section 3-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-203] CJIS Code 1-1415

Misdemeanor
10 years – \$2,500

<u>Count Fifty-Four</u> (Theft \$1,500 – \$25,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 27, 2017, at or near the 1200 block of Key Highway, Baltimore City, Maryland, the Defendant, Daquan JOHNSON, did steal a gray 2016 BMW, and contents therein, of having a value of at least \$1,500 but less than \$25,000, in violation of the Criminal Law Article, Section 7-104, of the Maryland Code against the peace, government and dignity of the State.

COUNT FIFTY-FIVE

(THEFT SCHEME - OVER \$100,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, in Baltimore City and Baltimore County, Maryland, the Defendant did, between the dates of September 13, 2017, and December 7, 2017, pursuant to one scheme and continuing course of conduct, steal the personal property of all property owners as listed in Count One's overt acts and the subsequent substantive counts in this Indictment, having a value of \$100,000 or more, in violation of the Criminal Law Article, Section 7-104, of the Maryland Code against the peace, government and dignity of the State.

[CR 7-104] CJIS Code 1-1303 Felony 20 years – \$25,000

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