

C-03-CR-23-004281

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY

STATE OF MARYLAND

v.

ANECIO RODRIGUEZ

1319 Crofton Road
Baltimore, MD 21239
DOB: 12/14/2003
SID: 4474005

Tracking Number: 23-7003-00347-3

(TRUE BILL)

GRAND JURY FOREPERSON

FILED: October 11, 2023

CHARGES:

1. Participation in a Criminal Organization (Maryland Criminal Law Article §9-804(a)).
2. Participation in a Criminal Organization – Conspiracy (Maryland Criminal Law Article §9-804(d)).
3. Participation in a Criminal Organization- Resulting in Death (Maryland Criminal Law Article §9-804(e)).
4. Common Law Conspiracy – Conspiracy to Do a Lawful Act by Unlawful Means (Common Law of Maryland).
5. Theft Scheme - Over \$100,000 (Maryland Criminal Law Article § 7-104)
6. Armed Carjacking (Maryland Criminal Law Article §3-405(c))
7. Carjacking (Maryland Criminal Law Article § 3-405(b))
8. Assault - 1st Degree (Maryland Criminal Law Article § 3-202)
9. Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)
10. Armed Robbery (Maryland Criminal Law Article §3-403)
11. Robbery (Maryland Criminal Law Article § 3-402)
12. Firearm – Crime of Violence (Maryland Criminal Law Article § 4-204(b))

13. Wearing, Carrying, or Transporting a Handgun § 4-203(a)(1)(i))
14. Reckless Endangerment (Maryland Criminal Law Article § 3-204).
15. Unauthorized Use (Maryland Criminal Law Article § 7-203)
16. Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104).
17. Armed Carjacking (Maryland Criminal Law Article §3-405(c))
18. Carjacking (Maryland Criminal Law Article § 3-405(b))
19. Assault - 1st Degree (Maryland Criminal Law Article § 3-202)
20. Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)
21. Armed Robbery (Maryland Criminal Law Article §3-403)
22. Robbery (Maryland Criminal Law Article § 3-402)
23. Firearm – Crime of Violence (Maryland Criminal Law Article § 4-204(b))
24. Wearing, Carrying, or Transporting a Handgun § 4-203(a)(1)(i))
25. Reckless Endangerment (Maryland Criminal Law Article § 3-204).
26. Unauthorized Use (Maryland Criminal Law Article § 7-203)
27. Theft \$25,000-\$100,000 (Maryland Criminal Law Article § 7-104).
28. Attempted Armed Carjacking (Maryland Criminal Law Article §3-405(c))
29. Attempted Carjacking (Maryland Criminal Law Article § 3-405(b))
30. First Degree Murder (Maryland Criminal Law Article §2-201(a)(4)(iv))
31. Conspiracy First Degree Murder (Common Law)
32. Second Degree Murder (Maryland Criminal Law Article §2-204)
33. Firearm – Crime of Violence (Maryland Criminal Law Article § 4-204(b))
34. Illegal Possession of Regulated Firearm: Person Under 21 (Public Safety Article §5-133(d))
35. Loaded Handgun on Person (Maryland Criminal Law Article §4-203(a)(1)(v))
36. Wearing, Carrying, or Transporting a Handgun § 4-203(a)(1)(i))
37. Motor Vehicle Theft (Maryland Criminal Law Article § 7-105).
38. Unauthorized Use (Maryland Criminal Law Article § 7-203)
39. Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104).
40. Attempted Armed Carjacking (Maryland Criminal Law Article §3-405(c))
41. Attempted Carjacking (Maryland Criminal Law Article § 3-405(b))
42. Assault - 1st Degree (Maryland Criminal Law Article § 3-202)
43. Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)
44. Attempted Armed Robbery (Maryland Criminal Law Article §3-403)
45. Attempted Robbery (Maryland Criminal Law Article § 3-402)
46. Firearm – Crime of Violence (Maryland Criminal Law Article § 4-204(b))
47. Wearing, Carrying, or Transporting a Handgun § 4-203(a)(1)(i))
48. Reckless Endangerment (Maryland Criminal Law Article § 3-204).
49. Armed Carjacking (Maryland Criminal Law Article §3-405(c))
50. Carjacking (Maryland Criminal Law Article § 3-405(b))
51. Assault - 1st Degree (Maryland Criminal Law Article § 3-202)
52. Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)

53. Armed Robbery (Maryland Criminal Law Article §3-403)
54. Robbery (Maryland Criminal Law Article § 3-402)
55. Firearm – Crime of Violence (Maryland Criminal Law Article § 4-204(b))
56. Wearing, Carrying, or Transporting a Handgun § 4-203(a)(1)(i))
57. Reckless Endangerment (Maryland Criminal Law Article § 3-204).
58. Unauthorized Use (Maryland Criminal Law Article § 7-203)
59. Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104).
60. Armed Robbery (Maryland Criminal Law Article §3-403)
61. Robbery (Maryland Criminal Law Article § 3-402)
62. Assault - 1st Degree (Maryland Criminal Law Article § 3-202)
63. Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)
64. Firearm – Crime of Violence (Maryland Criminal Law Article § 4-204(b))
65. Wearing, Carrying, or Transporting a Handgun § 4-203(a)(1)(i))
66. Reckless Endangerment (Maryland Criminal Law Article § 3-204).
67. Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104).
68. Armed Carjacking (Maryland Criminal Law Article §3-405(c))
69. Carjacking (Maryland Criminal Law Article § 3-405(b))
70. Assault - 1st Degree (Maryland Criminal Law Article § 3-202)
71. Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)
72. Armed Robbery (Maryland Criminal Law Article §3-403)
73. Robbery (Maryland Criminal Law Article § 3-402)
74. Firearm – Crime of Violence (Maryland Criminal Law Article § 4-204(b))
75. Wearing, Carrying, or Transporting a Handgun § 4-203(a)(1)(i))
76. Reckless Endangerment (Maryland Criminal Law Article § 3-204).
77. Unauthorized Use (Maryland Criminal Law Article § 7-203)
78. Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104).
79. Armed Carjacking (Maryland Criminal Law Article §3-405(c))
80. Carjacking (Maryland Criminal Law Article § 3-405(b))
81. Assault - 1st Degree (Maryland Criminal Law Article § 3-202)
82. Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)
83. Armed Robbery (Maryland Criminal Law Article §3-403)
84. Robbery (Maryland Criminal Law Article § 3-402)
85. Firearm – Crime of Violence (Maryland Criminal Law Article § 4-204(b))
86. Wearing, Carrying, or Transporting a Handgun § 4-203(a)(1)(i))
87. Reckless Endangerment (Maryland Criminal Law Article § 3-204).
88. Unauthorized Use (Maryland Criminal Law Article § 7-203)
89. Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104).
90. Attempted Armed Carjacking (Maryland Criminal Law Article §3-405(c))
91. Attempted Carjacking (Maryland Criminal Law Article § 3-405(b))
92. Assault - 1st Degree (Maryland Criminal Law Article § 3-202)

93. Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)
94. Attempted Armed Robbery (Maryland Criminal Law Article §3-403)
95. Attempted Robbery (Maryland Criminal Law Article § 3-402)
96. Firearm – Crime of Violence (Maryland Criminal Law Article § 4-204(b))
97. Wearing, Carrying, or Transporting a Handgun § 4-203(a)(1)(i))
98. Reckless Endangerment (Maryland Criminal Law Article § 3-204).
99. Theft \$100 - \$1500 (Maryland Criminal Law Article § 7-104)
100. Burglary- Second Degree (Maryland Criminal Law Article § 6-203)
101. Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104).
102. Armed Carjacking (Maryland Criminal Law Article §3-405(c))
103. Carjacking (Maryland Criminal Law Article § 3-405(b))
104. Assault - 1st Degree (Maryland Criminal Law Article § 3-202)
105. Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)
106. Armed Robbery (Maryland Criminal Law Article §3-403)
107. Robbery (Maryland Criminal Law Article § 3-402)
108. Firearm – Crime of Violence (Maryland Criminal Law Article § 4-204(b))
109. Wearing, Carrying, or Transporting a Handgun § 4-203(a)(1)(i))
110. Reckless Endangerment (Maryland Criminal Law Article § 3-204).
111. Unauthorized Use (Maryland Criminal Law Article § 7-203)
112. Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104).
113. Armed Carjacking (Maryland Criminal Law Article §3-405(c))
114. Carjacking (Maryland Criminal Law Article § 3-405(b))
115. Assault - 1st Degree (Maryland Criminal Law Article § 3-202)
116. Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)
117. Armed Robbery (Maryland Criminal Law Article §3-403)
118. Robbery (Maryland Criminal Law Article § 3-402)
119. Firearm – Crime of Violence (Maryland Criminal Law Article § 4-204(b))
120. Wearing, Carrying, or Transporting a Handgun § 4-203(a)(1)(i))
121. Reckless Endangerment (Maryland Criminal Law Article § 3-204).
122. Unauthorized Use (Maryland Criminal Law Article § 7-203)
123. Burglary- First Degree- (Maryland Criminal Law Article § 6-202)
124. Theft \$25,000-\$100,000 (Maryland Criminal Law Article § 7-104).
125. Burglary- Second Degree (Maryland Criminal Law Article § 6-203)
126. Burglary- Second Degree (Maryland Criminal Law Article § 6-203)
127. Burglary- Second Degree (Maryland Criminal Law Article § 6-203)
128. Attempted Burglary- Second Degree (Maryland Criminal Law Article § 6-203)
129. Burglary- Second Degree (Maryland Criminal Law Article § 6-203)
130. Reckless Endangerment (Maryland Criminal Law Article § 3-204).
131. Armed Carjacking (Maryland Criminal Law Article §3-405(c))
132. Carjacking (Maryland Criminal Law Article § 3-405(b))

133. Assault - 1st Degree (Maryland Criminal Law Article § 3-202)
134. Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)
135. Armed Robbery (Maryland Criminal Law Article §3-403)
136. Robbery (Maryland Criminal Law Article § 3-402)
137. Firearm – Crime of Violence (Maryland Criminal Law Article § 4-204(b))
138. Wearing, Carrying, or Transporting a Handgun § 4-203(a)(1)(i))
139. Reckless Endangerment (Maryland Criminal Law Article § 3-204).
140. Unauthorized Use (Maryland Criminal Law Article § 7-203)
141. Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104).
142. Motor Vehicle Theft (Maryland Criminal Law Article § 7-105).
143. Unauthorized Use (Maryland Criminal Law Article § 7-203)
144. Theft \$25,000-\$100,000 (Maryland Criminal Law Article § 7-104).
145. Armed Carjacking (Maryland Criminal Law Article §3-405(c))
146. Carjacking (Maryland Criminal Law Article § 3-405(b))
147. Assault - 1st Degree (Maryland Criminal Law Article § 3-202)
148. Assault - 2nd Degree (Maryland Criminal Law Article § 3-203)
149. Armed Robbery (Maryland Criminal Law Article §3-403)
150. Robbery (Maryland Criminal Law Article § 3-402) .
151. Firearm – Crime of Violence (Maryland Criminal Law Article § 4-204(b))
152. Wearing, Carrying, or Transporting a Handgun § 4-203(a)(1)(i))
153. Reckless Endangerment (Maryland Criminal Law Article § 3-204).
154. Unauthorized Use (Maryland Criminal Law Article § 7-203)
155. Theft \$1,500 - \$25,000 (Maryland Criminal Law Article § 7-104).
156. Theft \$100 - \$1500 (Maryland Criminal Law Article § 7-104)

WITNESS:

Ryan O'Connor
ATF Task Force Officer

STATE OF MARYLAND

* IN THE

v.

* CIRCUIT COURT

ANECIO RODRIGUEZ

* FOR BALTIMORE COUNTY

Defendant

* CASE NO:

INDICTMENT

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

COUNT ONE

(PARTICIPATION IN CRIMINAL GANG)

The Jurors of the State of Maryland for the body of Baltimore County, do on their oath present that, from at least April 2022 through the present day, in Baltimore County, Baltimore City, and elsewhere in Maryland, the DEFENDANT, along with [REDACTED], [REDACTED], Lovelle LITTLE, Kevin MILLS, Twan ELLIS, and others known and unknown to the Jurors, did knowingly, intentionally, and unlawfully combine, confederate, agree, and conspire to participate in, facilitate, aid, abet, assist, encourage, incite, approve of, protect, and promote an organization whose objective was to take the personal property of others, including cellular phones, other electronic devices, cash, motor vehicles, and other assorted personal property for financial gain, accomplishing this objective by unlawful criminal means including, but not limited to, commercial armed robberies, armed robberies, homicides, attempted murders armed carjackings, acts of violence, theft, and the illegal use of weapons including handguns, in violation of the Common Law of Maryland; against the peace, government, and dignity of the State.

Background. Manner, Means, and Methods of the Conspiracy

1. The Defendant, including [REDACTED], [REDACTED], Lovelle LITTLE, Kevin MILLS, Twan ELLIS, and others known and unknown, are associates who have been working together as an organization to commit and carry out a spree of armed commercial robberies, armed robberies, armed carjackings, and thefts, in order to obtain control of the personal and business property of others for financial gain (hereinafter, "the Enterprise").

2. Members and associates of the Enterprise typically either take the personal property as their own, use the items to facilitate the commission of future robberies and thefts, and/or dispose of property that is unwanted or no longer needed.

3. Members and associates of the Enterprise typically take the business's property as their own for financial gain and dispose of the property that is unwanted or no longer needed.

4. The items that the Enterprise seeks control of include, but are not limited to, cellular phones and other electronic devices; ATM machines, cash registers, motor vehicles; wallets, credit cards, bank cards, and money; and other items that the members of the Enterprise want to keep as their own or believe will make them money.

5. Members and associates of the Enterprise frequently target victims who have just parked, have just exited their vehicle, and/or are walking to or from their homes and cars. Members and associates of the Enterprise will then, while the victim is standing in close proximity or walking away from their vehicle, attack the victim, steal the victim's property, and flee in the victim's car and/or in a getaway vehicle (which is often a previously stolen vehicle).

6. While committing these crimes, members and associates of the Enterprise dress in clothing that conceals their identities from victims, witnesses, and surveillance. For example, members of the Enterprise will wear masks covering their faces as well as dark clothing. Members and associates of the Enterprise frequently carry out their crimes at nighttime.

7. Members and associates of the Enterprise utilize handguns and bricks in order to commit robberies, carjackings, and auto thefts. Members and associates of the Enterprise frequently point the handguns at the victims, threatening them to relinquish control of their personal property. Members of the Enterprise also frequently use bricks to break into and gain access to commercial businesses.

8. Members and associates of the Enterprise regularly commit violence to accomplish their objectives, often continuing to assault the victim after the members and associates have control of the victim's vehicle and personal property.

9. In a typical robbery committed by the Enterprise, members and associates have different roles, including but not limited to the following: bringing handguns and other weapons to threaten and assault the victims; waiting nearby as lookouts or getaway drivers; taking and resuming control over the stolen property; disposing of property that is unwanted or no longer needed; and engaging in other acts that further the success of the serial robberies committed by the Enterprise.

10. In a typical robbery committed by the Enterprise, members and associates quickly approach their victim in an organized fashion, and immediately, while brandishing weapons—often pointed at the victim's head—demand that the victim turn over all of his/her personal property.

11. In a typical commercial robbery committed by the Enterprise, members and associates use bricks to break into businesses to gain access to ATM machines and cash registers which they often take out of the businesses and later open to retrieve cash. Members and associates of the Enterprise also steal other products within the businesses.

12. Members and associates of the Enterprise sometimes order the victim—while holding them at gunpoint—to unlock their cellular phone and disable any location tracking applications or settings. Members and associates of the Enterprise will, when possible, take control

of the user account associated with the cellular phone, in an attempt to prevent the victim or law enforcement from accessing or tracking the phone remotely.

13. Members and associates of the Enterprise would take photographs and gather pertinent information about the stolen vehicles including but not limited to license plate numbers, vehicle identification numbers, and vehicle title information, send the information and photographs to another associate who would then direct members of the Enterprise where to take the stolen vehicles.

14. Members and associates of the Enterprise utilize Facebook Marketplace to sell and dispose of the stolen property.

15. Members and associates of the Enterprise not only interact with each other and many of the same individuals in and around Maryland, but also are connected with each other and many of the same individuals on social media, particularly Facebook and Instagram, which they use to communicate with each other during the course of this conspiracy.

16. Members and associates of the Enterprise have been known to document themselves "posing" with the cash, stolen property, and firearms by posting photos on their social media accounts.

17. Members and associates of the Enterprise are known to reside at, frequent, and store stolen property in/at and/or near, the following locations in Baltimore City, Maryland: the 2400 block of Baker Street, 2200 block of Presstman Street, 1500 block of North Pulaski Street, 1500 block of North Bentalou Street, 2800 block of Rockrose Avenue, 4100 block Towanda Avenue, 2800 block of Violet Avenue which are "hubs" for the Enterprise's operations. Several stolen vehicles have also been stored in front of, across the street from, around the block from, or in close vicinity to the locations.

Overt Acts in Furtherance of the Conspiracy

18. In furtherance of the conspiracy and to achieve the objectives thereof, members and associates of the Enterprise, including the Defendant and others known and unknown, performed and caused to be performed the following acts, among others, in Maryland, including in Baltimore County, Baltimore City, and elsewhere:

19. On April 24, 2022, in or near the 1500 block of North Bentalou Street, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 1) at gunpoint. While Victim 1 was sitting at red light, the Enterprise blocked Victim 1's vehicle in, exited their vehicle and pointed a handgun at Victim 1 demanding that Victim 1 exit the vehicle. The Enterprise stole Victim 1's 2015 Beige Nissan Sentra. Victim 1's vehicle was recovered on December 31, 2022 in the 2200 block of Presstman Street.

20. On April 27, 2022, at or near 1769 Washington Boulevard, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 2) at gunpoint. Victim 2 pulled into a parking

space at the location, and the Enterprise exited their vehicle, pointed a handgun at Victim 2 and forced Victim 2 out of the vehicle. The Enterprise stole Victim 2's 2009 gray Nissan Rogue.

21. On April 27, 22, in or near the 2200 block of Calloway Avenue, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 3) at gunpoint. Victim 3 was in the block picking up a friend when the Enterprise pulled alongside of him, exited their vehicle and forced him out of the vehicle at gunpoint. The Enterprise stole Victim 3's white 2009 Nissan Altima. Victim 3's white 2009 Nissan Altima was recovered on December 31, 2022 in the 2200 block of Pressman Street.

22. On April 27, 2022, in or near the 2600 block of Huntingdon Avenue, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 4) at gunpoint. Victim 4 was walking to his vehicle when the Enterprise blocked his walking path with their vehicle, exited their vehicle and demanded the keys to Victim 4's vehicle. The Enterprise stole Victim 4's 2017 gray Honda Accord. Victim 4's ID and credit cards were found in the residence of Lovell LITTLE, a member of the Enterprise.

23. On May 11, 2022, at or near 135 Monastery Avenue, Baltimore, Maryland, the Enterprise stole an Amazon delivery driver's vehicle (Victim 5). As Victim 5 was delivering an Amazon package, the Enterprise entered Victim 5's vehicle and drove away, stealing Victim 5's 2007 black Chrysler 300. Victim 5's 2007 black Chrysler 300 was recovered on June 15, 2022 in the 2300 block of Baker Street.

24. On June 5, 2022, at or near 5230 Moravia Road, Baltimore, Maryland, the Enterprise broke into the Hip Hop Fish & Chicken restaurant. Using bricks to break the glass doors, the Enterprise entered the location and stole two cash registers.

25. On June 15, 2022, in or near the 1500 block of Northbourne Road, Baltimore, Maryland, the Enterprise attempted to carjack [REDACTED]'s (Victim 6) vehicle. The Enterprise exited their vehicle and demanded that Victim 6 hand over their car key. As the Enterprise attempted to open Victim 6's car door, Victim 6 drove off, crashing into the suspect vehicle.

26. On June 15, 2022, in or near the 1600 block of Northgate Road, Baltimore, Maryland, the Enterprise carjacked [REDACTED]'s (Victim 7) vehicle. As Victim 7 sat in their vehicle, the Enterprise parked and exited their vehicle and forced Victim 7 out of their vehicle. The Enterprise stole Victim 7's burgundy 2019 Toyota Highlander. Victim 7's burgundy 2019 Toyota Highlander was recovered on June 15, 2022 in the 2400 block of Baker Street.

27. On September 11, 2022, at or near 2835 Hampden Avenue, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 8) at gunpoint. While Victim 8 approached their vehicle with their keys in hand, the Enterprise approached Victim 8 with handguns and took his keys. The Enterprise stole Victim 8's silver 2013 Chevrolet Equinox. Victim 8's silver 2013 Chevrolet Equinox was recovered on September 19, 2022 in the 1500 block of Pulaski Street.

28. On September 11, 2022, in or near the 1100 block of Red Road, Baltimore, Maryland, the Enterprise carjacked and robbed [REDACTED] (Victim 9) at gunpoint. As Victim 9 was

driving his vehicle, the Enterprise cut him off with their vehicle, blocking Victim 9's path, exited their vehicle, and approached Victim 9 with handguns and demanded that Victim 9 "get the fuck out of the car." The Enterprise stole Victim 9's 2018 silver Chevrolet Malibu and his wallet. Victim 9's vehicle was recovered on September 14, 2022 in the 1500 block of Pulaski Street.

29. On September 24, 2022, in or near the 1500 block of North Smallwood Street, Baltimore, Maryland, the Enterprise discharged a firearm. One 9mm shell casing was recovered.

30. On October 23, 2022, at or near 5212 Loch Raven Boulevard, Baltimore, Maryland, the Enterprise stole [REDACTED]'s (Victim 10) white 2015 Kia Forte.

31. On October 28, 2022, in or near the 3600 block of Reisterstown Road, Baltimore, Maryland, the Enterprise stole [REDACTED]'s (Victim 11) silver 2016 Hyundai Sonata. Victim 11's silver 2016 Hyundai Sonata was recovered on December 16, 2022 in the 3500 block of Greenmount Avenue after it had been involved in an accident.

32. On October 29, 2022, at or near 5600 Reisterstown Road, Baltimore, Maryland, the Enterprise, using Victim 10's white 2015 Kia Forte, attempted carjack [REDACTED]'s (Victim 12) at gunpoint. While Victim 12 was paying for his gasoline, the Enterprise entered Victim 12's dark colored BMW and attempted to steal the vehicle. As Victim 12 and the Enterprise struggled over the vehicle, another member of the Enterprise began to fire a handgun at Victim 12. The four shell casings recovered from the location were consistent with the shell casings recovered on September 24, 2022 from the 1500 block of North Smallwood Street.

33. On October 29, 2022, at or near 4704 Loch Raven Boulevard, Baltimore, Maryland, the Enterprise stole [REDACTED] (Victim 13) black 2017 Kia Sportage.

34. On November 1, 2022, in or near the 3300 block of Woodbrooke Avenue, Baltimore, Maryland, the Enterprise, utilizing Victim 12's vehicle, carjacked [REDACTED] (Victim 14) at gunpoint. While Victim 14 sat in their vehicle, the Enterprise approached the vehicle and demanded that Victim 14 exit the vehicle. The Enterprise stole Victim 14's silver 2016 Honda Civic. Victim 13's black 2017 Kia Sportage was recovered at the scene.

35. On November 2, 2022, in or near the 1200 block of Ashburton Street, Baltimore, Maryland, the Enterprise discharged a firearm. Six 9mm shell casings were recovered and were consistent with the shell casings recovered on September 24, 2022 in the 1500 block of North Smallwood Street and on October 29, 2022 in the 5600 block of Reisterstown Road.

36. On November 2, 2022, at or near 5102 Goodnow Road, Baltimore, Maryland, the Enterprise broke into several vehicles, including [REDACTED]'s (Victim 15) white 2011 Volkswagen Sedan. The Enterprise stole Victim 15's Taurus G3 9mm handgun from the vehicle.

37. On November 3, 2022, in or near the 200 block of West 23rd Street, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 16) at gunpoint. While Victim 16 was sitting in their vehicle, the Enterprise approached the vehicle from both sides and pointed handguns with green lasers and threatened to shoot Victim 16 and ordered them to exit the vehicle. The Enterprise drove off stealing Victim 16's gray 2007 Nissan Altima.

38. On November 3, 2022, in or near the 2300 block of Eutaw Place, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 17) at gunpoint. While Victim 17 sat in their black 2022 Nissan Altima, the Enterprise approached the vehicle and stated "give it up" to Victim 17 while rummaging through Victim 17's pockets. The Enterprise drove off stealing Victim 17's black 2022 Nissan Altima. Victim 17's vehicle was recovered on November 4, 2022 in the 600 block of Braddish Avenue from a member of the Enterprise.

39. On November 3, 2022, in or near the 2500 block of Brookfield Avenue, Baltimore, Maryland, the Enterprise attempted to carjack rideshare driver [REDACTED] (Victim 18). While Victim 18 was driving [REDACTED] (Victim 19), [REDACTED] (Victim 20), and [REDACTED] (Victim 21) to their destination, the Enterprise cut off Victim 18 by blocking his path of travel using Victim 16's gray 2007 Nissan Altima. While trying to evade the Enterprise, Victim 18 continued driving and the Enterprise fired a 9mm handgun into the vehicle killing Victim 19. Two 9mm shell casings were recovered from the scene.

40. On December 10, 2022, at or near 3909 Bareva Road, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 22) at gunpoint while they sat in their 2016 blue Infiniti Q70. Victim 22's vehicle was recovered on February 16, 2023 in the 300 block of South Bentalou Street.

41. On December 10, 2022, in or near the 3200 block of Rosalie Road, Baltimore, Maryland, the Enterprise attempted to carjack [REDACTED] (Victim 23) at gunpoint. The Enterprise fired two 9mm handguns at Victim 23 and he sustained a gunshot wound to the head. Two 9mm shell casings were located at the scene and one 9mm shell casings was consistent with the 9mm shell casings located at the scene on November 3, 2022 in the 2500 block of Brookfield Avenue where Victim 19 was killed, consistent with the 9mm shell casing located on September 24, 2022 in the 1500 block of North Smallwood Street, consistent with the 9mm shell casings located on October 29, 2022 in the 5600 block of Reisterstown Road, consistent with the 9mm shell casings located on November 2, 2022 in the 1200 block of Ashburton Street.

42. On December 10, 2022, in or near the 1100 block of East Coldspring Lane, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 24) at gunpoint. Victim 24 was sitting in his white 2018 Hyundai Tucson when the Enterprise approached his vehicle and stated, "get the fuck out of the car." The Enterprise then pistol-whipped Victim 24 and stole his white 2018 Hyundai Tucson and his green Apple iPhone 13. Victim 24's White Hyundai Tucson was recovered on December 31, 2022 in the 1500 block Bentalou Street. Victim 24's Apple iPhone was pawned Lovelle LITTLE, a member of the Enterprise.

43. On December 10, 2022, in or near the 1700 block of Moreland Avenue, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 25) at gunpoint. While Victim 25 sat in his gray 2012 Honda Accord, the Enterprise, using Victim 24's white 2018 Hyundai Tucson, pulled up next to Victim 25, exited the vehicle and stated, "you know what it is." The Enterprise then stole Victim 25's gray 2012 Honda Accord. Victim 25's gray 2012 Honda Accord was recovered on December 13, 2022 in the 2200 block of Baker Street.

44. On December 13, 2022, in or near the 1400 block of North Monroe Street, Baltimore, Maryland, the Enterprise discharged two firearms. Two 9mm shell casings were recovered. One of the 9mm shell casings recovered was consistent with the 9mm shell casings recovered on November 3, 2022 in the 2500 block of Brookfield Avenue where Victim 18 was killed, consistent with the 9mm shell casing located on September 24, 2022 in the 1500 block of North Smallwood Street, consistent with the 9mm shell casings located on October 29, 2022 in the 5600 block of Reisterstown Road, consistent with the 9mm shell casings located on November 2, 2022 in the 1200 block of Ashburton Street.

45. On December 16, 2022, at or near 1514 Caton Avenue, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 26) at gunpoint using Victim 11's silver 2016 Hyundai Sonata. While Victim 26 was pumping gas into her gray 2014 Dodge Charger, the Enterprise exited a vehicle with handguns and demanded Victim 26's keys. The Enterprise then stole Victim 26's gray 2014 Dodge Charger. Victim 26's gray 2014 Dodge Charger was recovered on December 16, 2022 in the 400 block of South Pulaski Street.

46. On December 16, 2022, at or near 4434 Falls Road, Baltimore, Maryland, the Enterprise robbed the Exxon Mobil gas station at gunpoint. The Enterprise entered the store and yelled, "get the money" while pointing a handgun at the store clerk. The Enterprise stole \$70 in U.S. currency and tobacco products valued at approximately \$210.

47. On December 16, 2022, in or near the 4300 block of Wabash Avenue, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 27) at gunpoint. While Victim 27 was sleeping in his silver 2010 Infiniti G37, the Enterprise pointed a handgun at Victim 27 and stated, "get the fuck out of the car." The Enterprise also demanded that Victim 27 "unlock his phone." The Enterprise stole Victim 27's silver 2010 Infiniti G37 and Apple iPhone 14.

48. On December 16, 2022, at or near 501 East 33rd Street, Baltimore, Maryland, the Enterprise stole [REDACTED]'s (Victim 28) white 2017 Ford Fusion while Victim 28 was paying for gas. Victim 28's vehicle was recovered in the rear of 3600 block of Towanda Avenue near the residence of Kevin MILLS, a member of the Enterprise. Victim 28's identification card was found at the residence of Twan Ellis, a member of the Enterprise, on March 9, 2023.

49. On December 16, 2022, at or near 5124 Craig Avenue, Baltimore, Maryland, the Enterprise stole [REDACTED]'s (Victim 29) black 2015 Honda Accord from his driveway.

50. On December 16, 2022, in or near the 3900 block of Greenmount Avenue, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 30) at gunpoint. While Victim 30 was delivering newspapers, the Enterprise entered his silver 2019 Chevrolet Traverse and when Victim 30 tried to get back into his vehicle, the Enterprise pointed a handgun at him. The Enterprise stole Victim 30's silver 2019 Chevrolet Traverse and his Apple iPhone 13. Victim 30's silver 2019 Chevrolet Traverse was recovered on December 18, 2022 in the 1300 block of Harlem Avenue.

51. On December 16, 2022, at or near 2602 Hampden Avenue, Baltimore, Maryland, the Enterprise stole [REDACTED]'s (Victim 31) blue 2014 Hyundai Santa Fe. Victim 31's blue 2014 Hyundai Santa Fe was recovered on December 17, 2022 in the 4100 block of Towanda Avenue. A cellphone belonging to Lovelle Little, a member of the Enterprise, was connected to the vehicle's Bluetooth.

52. On December 17, 2022, at or near 501 East 33rd Street, Baltimore, Maryland, the Enterprise attempted to carjack [REDACTED] (Victim 32) at gunpoint. Victim 32 was sitting in her 2021 Nissan Versa at the Exxon Mobil gas station waiting for a friend to bring gas money when the Enterprise, using Victim 31's blue 2014 Hyundai Santa Fe, approached her vehicle while pointing a handgun at her and stated, "get the fuck out of the car, give me your keys." Victim 32 exited the vehicle, and the Enterprise entered her vehicle and attempted to leave but the vehicle was out of gas.

53. On December 17, 2022, in or near the 500 block of Macon Street, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 33) at gunpoint. While Victim 33 was parking his blue 2010 Nissan Altima, the Enterprise approached the vehicle while pointing a silver handgun at Victim 33 and demanded that he exit the vehicle. The Enterprise stole Victim 33's blue 2010 Nissan Altima. Victim 33's blue Nissan Altima was recovered on December 17, 2022 in the 4100 block of Towanda Avenue.

54. On December 17, 2022, in or near the 3700 block of Claremont Street, Baltimore, Maryland, the Enterprise robbed [REDACTED] (Victim 34) and [REDACTED] (Victim 35) at gunpoint. While Victim 34 was standing next to his vehicle, the Enterprise, using Victim 33's blue 2010 Nissan Altima, approached Victim 34 and Victim 35 displaying several handguns and stole the key fob to Victim 34's blue 2018 Mercedes Benz GLC 43. After taking the key fob, the Enterprise entered Victim 34's vehicle and stole his Dolce & Gabbana sneakers, Fossil watch, Christian Dior bag, Cartier glasses. The Enterprise also stole Victim 35's Nike Air Jordans and his Apple iPhone Pro.

55. On December 17, 2022, in or near the 2300 block of East Fairmount Avenue, Baltimore, Maryland, the Enterprise carjacked and robbed [REDACTED] (Victim 36), [REDACTED] (Victim 37), and [REDACTED] (Victim 38) at gunpoint. While Victims 36, 37, and 38 were sitting on Victim 37's gray 2013 Nissan Altima, the Enterprise approached the victims with several handguns and demanded that the victims, "get out of the car" and "give me your stuff." After taking Victim 37's gray 2013 Nissan Altima and other property, the Enterprise discharged a firearm. One 9mm shell casing was recovered from the scene. The 9mm shell casing recovered from the scene was consistent with the 9mm shell casings recovered on November 3, 2022 in the 2500 block of Brookfield Avenue where Victim 18 was killed, the shell casings recovered on December 10, 2022, in or near the 3200 block of Rosalie Road, and the shell casings recovered on December 13, 2022 in or near the 1400 block of North Monroe Street. Victim 37's gray Nissan Altima was recovered on December 17, 2022 in the 4100 block of Towanda Avenue.

56. On December 25, 2022, in or near the 1900 block of Letitia Avenue Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 39) at gunpoint. While Victim 39 sat in his green 2013 Toyota Sienna, the Enterprise, using a white SUV, backed into his vehicle and

approached Victim 39 displaying several handguns and demanded that he "give up his property" and "exit the vehicle." After refusing to unlock and "give up" his Apple iPhone 11, the Enterprise pistol-whipped Victim 39. The Enterprise stole Victim 39's green 2013 Toyota Sienna. Victim 39's green 2013 Toyota Sienna was recovered on January 5, 2023 in the 2400 block of Baker Street.

57. On December 25, 2022, at or near 619 Rappolla Street, Baltimore, Maryland, the Enterprise carjacked and robbed [REDACTED] (Victim 40), [REDACTED] (Victim 41), [REDACTED] (Victim 42), and [REDACTED] (Victim 43) at gunpoint. While Victims 40, 41, 42, and 43 were sitting in Victim 40's black 2015 Nissan Rogue, the Enterprise approached the victims in a white SUV and exited the vehicle displaying several handguns. The Enterprise ordered the victims to "give up" their cell phones and money. The Enterprise stole Victim 40's black 2015 Nissan Rogue. Victim 40's vehicle license plate was recovered on February 9, 2023 from Lovelle LITTLE's, a member of the Enterprise, vehicle.

58. On December 25, 2022, at or near 3106 East Fairmount Avenue, Baltimore, Maryland, the Enterprise robbed [REDACTED] (Victim 44) and [REDACTED] (Victim 45) at gunpoint. While Victim 44 was waiting on a delivery, the Enterprise approached him displaying several handguns, forced him to the ground and pistol-whipped him. The Enterprise stated, "give me everything," and stole Victim 44's black Samsung Galaxy S20 cell phone, polo watch, and his wallet. The Enterprise placed a handgun to Victim 45's head and stole his Motorola cellular phone. The Enterprise also placed a handgun to the head of Leonel Rodriguez (Victim 46).

59. On December 25, 2022, at or near 3440 Wilkens Avenue, Baltimore, Maryland, the Enterprise, using Victim 40's black 2015 Nissan Rogue and several bricks, broke into the lounge and stole the cash register.

60. On December 25, 2022, at or near 3442 Wilkens Avenue, Baltimore, Maryland, the Enterprise, using several bricks, broke into the deli and stole the ATM.

61. On December 30, 2022, in or near the 2200 block of Brookfield Avenue, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 47) at gunpoint. While Victim 47 was sitting his silver 2000 Mercedes Benz SL 500, the Enterprise approached Victim 47 displaying several handguns and demanded that he exit the vehicle. The Enterprise stole Victim 47's silver 2000 Mercedes Benz SL 500. Victim 47's 2000 Mercedes Benz SL 500 was recovered on January 19, 2023 in the 2000 block of Presstman Street.

62. On December 30, 2022, in or near the 4000 block of Fleet Street, Baltimore, Maryland, the Enterprise attempted to carjack [REDACTED] (Victim 48) at gunpoint. While Victim 48 was sitting in his red 2015 Toyota Corolla, the Enterprise used a vehicle to block his path and approached him displaying several handguns. After taking Victim 48's personal property from the scene, the Enterprise fled the scene.

63. On December 30, 2022, at or near 503 West Coldspring Lane, Baltimore, Maryland, the Enterprise, using several bricks, broke into the cigar shop and stole \$520.00 in U.S. Currency, and several cases of CBD flour. The Enterprise then fled the scene.

64. On December 30, 2022, in or near the 3700 block of Falls Road, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 49) at gunpoint. While Victim 49 was sleeping in his 2021 Toyota RAV-4, the Enterprise opened the car door and pistol-whipped Victim 49. The Enterprise stole Victim 49's 2021 Toyota RAV-4 and other personal property. Victim 49's 2021 Toyota RAV-4 was recovered on January 4, 2023 in the 2400 block of Baker Street.

65. On December 30, 2022 at or near 2422 Briarwood Road, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 50) at gunpoint. While Victim 50 was parked in his driveway, sitting in his silver 2018 Kia Niro, the Enterprise approached the vehicle displaying several firearms and demanded that Victim 50 exit the vehicle. The Enterprise stole Victim 50's Apple iPhone 13 from his pocket. The Enterprise also demanded the keys to Victim 50's black 2014 Dodge Journey that was also parked in the driveway. The Enterprise then forced Victim 50 into his residence and stole an Apple MacBook, two Chromebook laptops, an Acer laptop, and the keys to the Dodge Journey. The Enterprise fled the residence taking both vehicles. Victim 50's silver 2018 Kia Niro was recovered on January 8, 2023 in the 2400 block of Baker Street. Victim 50's black 2014 Dodge Journey was recovered on January 16, 2023 in the 1500 block Bentalou Street. Victim 50's identification card and credit cards were recovered from the residence of Kevin Mills, a member of the Enterprise. Victim 50's Apple iPhone 13 was recovered from Anecio Rodriguez, a member of the Enterprise.

66. On January 2, 2023, at or near 801 East Baltimore Street, Baltimore, Maryland, the Enterprise, using Victim 49's 2021 Toyota Rav 4, threw a brick through the glass window of the Silver Moon II restaurant and attempted to steal the cash register and ATM machine. Unable to take the ATM machine, the Enterprise fled the location in Victim 49's 2021 Toyota Rav 4.

67. On January 2, 2023, at or near 1030 West 41st Street, Baltimore, Maryland, the Enterprise, using Victim 49's 2021 Toyota Rav 4, threw a brick through the glass window of the Tropical Smoothie Café and entered the location. The Enterprise fled the location in Victim 49's 2021 Toyota Rav 4.

68. On January 2, 2023, at or near 8519 Liberty Road, Randallstown, Maryland, the Enterprise, using Victim 49's 2021 Toyota Rav 4, threw a brick through the glass window of the Bangin' Fish and Chicken restaurant and entered the location. The Enterprise fled the location in Victim 49's 2021 Toyota Rav 4.

69. On January 2, 2023, at or near 865 West 36th Street, Baltimore, Maryland, the Enterprise, using Victim 49's 2021 Toyota Rav 4, threw a brick through the glass window of the Keller's Liquor Store and attempted to break into the store. The Enterprise fled the location in Victim 49's 2021 Toyota Rav 4.

70. On January 2, 2023, at or near 801 West 36th Street, Baltimore, Maryland, the Enterprise, using Victim 49's 2021 Toyota Rav 4, threw a brick through the glass window of the Charmery Ice Cream parlor and attempted to break into the store. The Enterprise fled the location in Victim 49's 2021 Toyota Rav 4.

71. On January 6, 2023, at or near 858 Washington Boulevard, Baltimore, Maryland, the Enterprise, using Victim 50's silver 2018 Kia Niro, carjacked [REDACTED] (Victim 51) at gunpoint. While Victim 51 was wiping the windows of her white 2020 Honda Accord, the Enterprise approached her displaying several handguns and stated, "give it up, give me the keys and the fanny pack." The Enterprise stole Victim 51's white 2020 Honda Accord and her fanny pack. Victim 51's white 2020 Honda Accord was recovered on January 6, 2023 in the 2800 block of Violet Avenue behind the residence of Kevin Mills, a member of the Enterprise. Victim 51's insurance card and vaccination card were recovered in the trunk of Victim 50's silver 2018 Kia Niro.

72. On January 6, 2023, at or near 3905 Liberty Heights Avenue, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 52) at gunpoint. After making a purchase at the gas station, Victim 52 was approached by the Enterprise as they displayed several handguns. The Enterprise demanded the keys to Victim 52's gray 2014 BMW X1 and his Apple iPhone 11. The Enterprise stole Victim 52's gray 2014 BMW X1 and his Apple iPhone 11. Victim 52's gray 2014 BMW X1 was recovered on January 7, 2023 in the 3300 block of Fairview Avenue.

73. On January 6, 2023, at or near 3312 Reisterstown Road, Baltimore, Maryland, the Enterprise, stole [REDACTED] (Victim 53) black 2015 Dodge Journey. Victim 53's black 2015 Dodge Journey was recovered on January 6, 2023 in the 2800 block of Violet Avenue behind the residence of Kevin Mills, a member of the Enterprise.

74. On January 6, 2023, in or near the 2200 block of Ashburton Street, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 54) at gunpoint. While Victim 54 was sitting his gray 2011 Honda Crosstour, the Enterprise blocked his path of travel with a vehicle and approached Victim 54 displaying several handguns and stated, "give me what you got." The Enterprise stole Victim 54's gray 2011 Honda Crosstour, his wallet containing \$40 in U.S. currency, and his black Apple iPhone 7. Victim 54's gray 2011 Honda Crosstour was recovered on January 24, 2023 in the 2500 block of Mosher Street.

75. On January 6, 2023, in or near the 2200 block of Powhatan Avenue, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 55) at gunpoint. While Victim 55 was exiting his blue 2011 Jeep Cherokee to walk his dog, the Enterprise approached him displaying a handgun and stated, "don't run. Give me the keys to your Jeep." The Enterprise also demanded Victim 55's cell phone and the passcode. The Enterprise stole Victim 55's blue 2011 Jeep Cherokee and his Apple iPhone 11. Victim 55's blue 2011 Jeep Cherokee was recovered on January 17, 2023 in the 1000 block of Bayard after a crash.

76. On January 9, 2023, at or near 1042 Upnor Road, Baltimore, Maryland, the Enterprise stole [REDACTED]'s (Victim 56) blue 2014 Hyundai Sonata. Victim 56's blue 2014 Hyundai Sonata was recovered on January 9, 2023 in the 1100 block of Beaumont Avenue.

77. On January 9, 2023, at or near 2735 Wilkens Avenue, Baltimore, Maryland, the Enterprise stole [REDACTED]' (Victim 57) black 2019 Kia Soul. Victim 57's black 2019 Kia Soul was recovered on January 9, 2023 in the 300 lock of Taplow Road after a crash.

78. On January 9, 2023, at or near 1307 Walker Avenue, Baltimore, Maryland, the Enterprise, using Victim 57's black 2019 Kia Soul, robbed [REDACTED] (Victim 58) and [REDACTED] (Victim 59) at gunpoint. As Victim 58 was exiting a friend's vehicle, the Enterprise approached him displaying several handguns and stated, "take everything off." The Enterprise went through Victim 58's pockets and stole his Samsung cell phone, wallet, bank cards, and Victim 59's purse.

79. On January 9, 2023, in or near the 1500 block of Kingsway Road, Baltimore, Maryland, the Enterprise, using Victim 57's black 2019 Kia Soul, carjacked [REDACTED] (Victim 60) at gunpoint. While Victim 60 was parking his silver 2013 Hyundai Elantra, the Enterprise approached him displaying several handguns and stated, "what are you looking at, give me your wallet" and punched him the head. The Enterprise stole Victim 60's silver 2013 Hyundai Elantra and his wallet. Victim 60's silver 2013 Hyundai Elantra was recovered on January 10, 2023 in the 1200 block of Winston Avenue.

80. On January 9, 2023, in or near the 1700 block of Northbourne Road, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 61) at gunpoint. The Enterprise approached Victim 61 as he was sitting in his black 2015 Mitsubishi Highlander displaying several handguns and pulled him out of the vehicle. The Enterprise then pistol-whipped Victim 61 and stole his black 2015 Mitsubishi Highlander, Apple iPhone 13, gold chain, identification cards, and another cell phone. The license plate belonging to Victim 61's black 2015 Mitsubishi Highlander was recovered on January 9, 2023 in the 1100 block of Beaumont Avenue near Victim 56's vehicle.

81. On January 10, 2023, in or near the 2200 block of Pressman Street, Baltimore, Maryland, the Enterprise discharged a firearm. Six 9mm shell casings were recovered from the scene. The 9mm shell casings were consistent with the 9mm shell casings recovered November 3, 2022 in the 2500 block of Brookfield Avenue where Victim 19 was killed, the shell casings recovered on December 10, 2022, in or near the 3200 block of Rosalie Road, the shell casings recovered on December 13, 2022 in or near the 1400 block of North Monroe Street, and the shell casings recovered on December 17, 2022, in or near the 2300 block of East Fairmount Avenue.

82. On January 13, 2023, at or near 1301 Kitmore Road, Baltimore, Maryland, the Enterprise stole [REDACTED] (Victim 62) silver 2019 Hyundai Elantra. Victim 62's silver 2019 Hyundai Elantra was recovered on January 13, 2023 in the 5300 block of Kenilworth Avenue.

83. On January 13, 2023, in or near the 1500 block of Medford Road, Baltimore, Maryland, the Enterprise, using Victim 62's silver 2019 Hyundai Elantra, carjacked [REDACTED] (Victim 63) at gunpoint. While Victim 63 was sitting in his silver 2006 Audi A6, the Enterprise approached him displaying several handguns and stated, "get the fuck out or we will kill you." The Enterprise stole Victim 63's silver 2006 Audi A6, his phone, and keys to another vehicle. Victim 63's silver 2006 Audi A6 was recovered on March 14, 2023 in the 500 block of Caton Avenue.

84. On January 13, 2023, at or near 5902 Pulaski Highway, Baltimore, Maryland, the Enterprise, attempted carjack [REDACTED] (Victim 64) at gunpoint. As Victim 64 was

attempting to pump gas into his vehicle, the Enterprise approached him displaying several firearms. The Enterprise pistol whipped Victim 64 and stole his cell phone.

85. On January 13, 2023, at or near 6005 Yorkwood Road, Baltimore, Maryland, the Enterprise, carjacked [REDACTED] (Victim 65) at gunpoint. While Victim 65 was sitting in his brown 2016 Infinity Q70, the Enterprise approached him displaying several handguns and stated, "give me the keys dummy" and ordered Victim 65 to get on the ground and further stated, "run him over." The Enterprise stole Victim 65's brown 2016 Infinity Q70, an Apple iPhone 12 Pro, and keys to another vehicle.

86. On January 14, 2023, in or near the 1100 block of Cleveland Street, Baltimore, Maryland, the Enterprise, using Victim 65's brown 2016 Infinity Q70, discharged several firearms. Six 9mm shell casings were recovered from the scene and were consistent with the 9mm shell casings recovered from the 1500 block of North Smallwood Street on September 24, 2022, the 9mm shell casings recovered from the 5600 block of Reisterstown Road on October 29, 2022, the 9mm shell casings recovered from the 1200 block of Ashburton on November 2, 2022, the 9mm shell casings recovered from the 3200 block of Rosalie Road on December 10, 2022, and the 9mm shell casings recovered from the 1400 block of Monroe Street on December 13, 2022. Two .40 caliber shell casings were also recovered. The firearm used in this incident was recovered from residence of Anecio Rodriguez, a member of the Enterprise.

87. On January 14, 2023, at or near the 601 East 33rd Street, Baltimore, Maryland, the Enterprise, using Victim 65's brown 2016 Infinity Q70, carjacked [REDACTED] (Victim 66) at gunpoint. While Victim 66 was inspecting his work truck, the Enterprise approached him displaying several handguns and stated, "give me everything before I blow your head off." The Enterprise then went through Victim 66's pockets and stole his wallet, his cell phone, and the key fob to his gray 2015 Mercedes Benz C300. The Enterprise then fled the area in Victim 66's gray 2015 Mercedes Benz C300. Victim 66's gray 2015 Mercedes Benz C300 was recovered on January 14, 2023 in the 1200 block of Linworth Avenue.

88. On January 14, 2023, at or near 1247 Linworth Avenue, Baltimore, Maryland, the Enterprise stole [REDACTED]'s (Victim 67) black 2011 Infiniti M37. Victim 67's black 2011 Infiniti M37 was recovered on January 14, 2023 in the 1200 block of Linworth Avenue near Victim 66's gray 2015 Mercedes Benz C300.

89. On January 14, 2023, at or near 206 West Coldspring Lane, Baltimore, Maryland, the Enterprise, using Victim 65's brown 2016 Infinity Q70, stole [REDACTED]'s (Victim 68) white 2017 Mercedes Benz GLC 300. Victim 68's white 2017 Mercedes Benz GLC 300 was recovered on January 14, 2023 in the 2900 block of Belmont Avenue.

90. On January 14, 2023, at or near 2500 Liberty Heights Avenue, Baltimore, Maryland, the Enterprise, using Victim 65's brown 2016 Infinity Q70, carjacked [REDACTED] (Victim 69) at gunpoint. While Victim 69 was leaving the 7/11 convenience store, the Enterprise approached him with several handguns and demanded his vehicle and money. The Enterprise fled in Victim 69's blue 2016 Infiniti QX50. The Enterprise also stole Victim 69's Smith & Wesson

.380 handgun. Victim 69's blue 2016 Infiniti QX50 was recovered on January 16, 2023 in the 3300 block of West Baltimore Street.

91. On January 23, 2023, in or near the 1500 block of Medford Road, Baltimore, Maryland, the Enterprise stole Victim 63's black 2013 Jaguar XF (See paragraph 83). Victim 63's black 2013 Jaguar XF was recovered on February 2, 2023 in the 5300 block of Kenilworth Avenue.

92. On January 23, 2023, at or near 102 North Clinton Street, Baltimore, Maryland, the Enterprise, using Victim 63's black 2013 Jaguar XF, the Enterprise robbed [REDACTED] (Victim 70), [REDACTED] (Victim 71), [REDACTED] (Victim 72), and [REDACTED] (Victim 73) at gunpoint. While Victim 70 was closing up her business for the day, the Enterprise approached the victims displaying several handguns and demanded money and property. The Enterprise stole Victim 70's Apple iPhone 14 Pro Max and \$3,300 in U.S. currency, Victim 71's Apple iPhone 12 Pro Max, wallet, and \$900 in U.S. currency, Victim 72's Samsung Galaxy cellphone, wallet, and \$300 in U.S. currency, and Victim 73's wallet and \$900 in U.S. currency.

93. On January 30, 2023, at or near 1243 Beaumont Avenue, Baltimore, Maryland, the Enterprise stole [REDACTED]'s (Victim 74) light blue 2016 Hyundai Sonata.

94. On January 30, 2023, in or near the 5900 block of Saint Regis Road, Baltimore, Maryland, the Enterprise, using Victim 74's light blue 2016 Hyundai Sonata, broke into several vehicles and stole property. The Enterprise broke into [REDACTED]'s (Victim 75) brown 2008 Buick Enclave; [REDACTED] (Victim 76) black 2016 Cadillac XTS; [REDACTED]'s black 2007 Chevrolet Impala and black 2016 Chevrolet Impala; [REDACTED]'s (Victim 77) silver 2019 Nissan Murano; and [REDACTED]'s red 1997 Ford F-150. The Enterprise stole Victim 78's purse containing her wallet and Victim 79's wallet containing \$150 in U.S. currency.

95. On January 30, 2023, at or near 5246 Harford Road, Baltimore, Maryland, the Enterprise, using Victim 74's light blue 2016 Hyundai Sonata, broke into the Papa John's Pizzeria. The Enterprise gained access to the pizzeria by using brick to break the glass door.

96. On January 30, 2023, at or near 5232 Harford Road, Baltimore, Maryland, the Enterprise, using Victim 74's light blue 2016 Hyundai Sonata, broke into the Royal Farms convenience store. The Enterprise gained access to the store by using brick to break the glass doors.

97. On January 30, 2023, in or near the 300 block of Grundy Street, Baltimore, Maryland, the Enterprise, using Victim 74's light blue 2016 Hyundai Sonata, attempted to carjack [REDACTED] (Victim 80) at gunpoint. While Victim 80 was sitting in his red 2014 Toyota Corolla, the Enterprise blocked Victim 80's vehicle and approached him displaying several handguns and demanded the keys to the vehicle. Victim 80 was able to drive away from the scene.

98. On January 30, 2023, at or near 405 Gusryan Street, Baltimore, Maryland, the Enterprise, carjacked [REDACTED] (Victim 81) at gunpoint. While Victim 81 was exiting his red 2018 Toyota Corolla, the Enterprise approached him displaying a knife and held it to Victim 81's neck and demanded the vehicle. The Enterprise stole Victim 81's red 2018 Toyota Corolla, an

Apple iPhone 11, and \$800 in U.S. currency. Victim 81's red 2018 Toyota Corolla was recovered on February 1, 2023 in the 5100 block of Northwood Drive.

99. On January 30, 2023, in or near the unit block of South Conkling Street, Baltimore, Maryland, the Enterprise, carjacked [REDACTED] (Victim 82) at gunpoint. While Victim 82 was walking away from his blue 2006 Acura TL, the Enterprise approached him displaying several handguns and demanded the keys to his vehicle. When Victim 82 refused, the Enterprise ran into him with a vehicle, pointed the handgun at him, took his car keys, and fled the scene in blue 2006 Acura TL. Victim 82's blue 2006 Acura TL was recovered on January 30, 2023 in the 2900 block of Rockrose Avenue.

100. On January 30, 2023, Victim 74's light blue 2016 Hyundai Sonata was recovered in the 3800 block of East Pratt Street.

101. On February 8, 2023, at 1636 Ruxton Avenue, Baltimore, Maryland, Lovelle Little possesses two firearms: a Titan Tiger .380 revolver and a Taurus G3 9mm handgun. The Taurus 9mm handgun was stolen from Victim 15 on November 2, 2022. (See paragraph 36)

102. On March 9, 2023, at 1319 Crofton Road, Baltimore, Maryland, Anecio Rodriguez possessed a .40 caliber handgun. This firearm is consistent with the firearm used on January 14, 2023 in the 1100 block of Cleveland Street. (See paragraph 86)

103. On August 2, 2023, at or near 900 West Patapsco Avenue, Baltimore, Maryland, the Enterprise carjacked [REDACTED] (Victim 83) at gunpoint. While Victim 83 was washing his silver 2011 Honda Accord, the Enterprise approached him displaying several handguns and demanded his car keys. The Enterprise fled the scene in Victim 83's silver 2011 Honda Accord. Victim 83's silver 2011 Honda Accord was recovered on September 19, 2023 in the 1300 block of Crofton Road next to the residence of Anecio Rodriguez, a member of the Enterprise

[CR 9-804(a)] CJIS 1-1394

Penalty: Felony

15Y/\$1,000,000

COUNT TWO
(PARTICIPATION IN A CRIMINAL ORGANIZATION – CONSPIRACY)

The Jurors of the State of Maryland for the body of Baltimore County, do on their oath present that, aforesaid DEFENDANT, at least as early as April 2022 through the present day, in Baltimore County, Baltimore City, and elsewhere, State of Maryland, did conspire with others known and unknown to the Jurors, to participate in a criminal organization, knowing that the members of said criminal organization engage in a pattern of organized crime activity, in violation of the Criminal Law Article, Section 9-804(d), of the Maryland Code; against the peace, government, and dignity of the State.

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

[CR 9-804(d)] CJIS 1-1395
Penalty: Felony
15Y/\$1,000,00

COUNT THREE
(PARTICIPATION IN A CRIMINAL ORGANIZATION – RESULTING IN DEATH)

The Jurors of the State of Maryland for the body of Baltimore County, do on their oath present that, aforesaid DEFENDANT, at least as early as April 2022 through the present day, in Baltimore County, Baltimore City, and elsewhere, State of Maryland, along with others known and unknown to the Jurors, did knowingly and willfully direct and participate in an underlying crime for the benefit of, at the direction of and in association with a criminal organization that resulted in the death of Delaka Augins, while a participant in a criminal organization, knowing that the members of said criminal organization engage in a pattern of organized crime activity in violation of the Criminal Law Article, Section 9-804(e), of the Maryland Code; against the peace, government, and dignity of the State.

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

[CR 9-804(e)] CJIS 1-1417
Penalty: Felony
25Y/ \$5,000,000

COUNT FOUR
(CONSPIRACY TO DO A LAWFUL ACT BY UNLAWFUL MEANS)

The Jurors of the State of Maryland for the body of Baltimore County, do on their oath present that, aforesaid DEFENDANT, at least as early as April 2022 through the present day, in Baltimore County, Baltimore City, and elsewhere, State of Maryland, unlawfully did conspire with others known and unknown to the Jurors, to combine to do a lawful act, to wit: to protect, enrich and participate in an association, by criminal and unlawful means, including, but not limited to, homicides, armed carjackings, thefts, and other acts of violence, as well as unlawful possession of firearms in violation of the common law of Maryland; against the peace, government, and dignity of the State.

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

[Common Law]

COUNT 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 County, Baltimore City, and elsewhere in Maryland, the Defendant did, from April 2022 through the present day, 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

COUNT SIX
(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 3, 2022, in or near the 200 block of West 23rd Street, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2007 Nissan Altima from [REDACTED] 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 SEVEN
(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 3, 2022, in or near the 200 block of West 23rd Street, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2007 Nissan Altima, from [REDACTED] who was then and there in actual possession of the motor vehicle, by threat of 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 EIGHT
(ASSAULT – FIRST 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 3, 2022, in or near the 200 block of West 23rd Street, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] in the first degree, in violation of the Criminal Law Article, Section 3-202, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-202] CJIS Code 1-1420
Felony
25 years

COUNT NINE
(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 3, 2022, in or near the 200 block of West 23rd Street, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] 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 TEN
(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 3, 2022, in or near the 200 block of West 23rd Street, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously, with a dangerous weapon, rob [REDACTED], 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 ELEVEN
(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 3, 2022, in or near the 200 block of West 23rd Street, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously rob [REDACTED] 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 TWELVE
(FIREARM – CRIME OF VIOLENCE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 3, 2022, in or near the 200 block of West 23rd Street, Baltimore City, State of Maryland, the Defendant, did use a firearm in the commission of a crime of violence, to wit: robbery, in violation of the Criminal Law Article, Section 4-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-204] CJIS Code 1-5299
Misdemeanor
5-20 years, 5 years mandatory

COUNT THIRTEEN
(HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 3, 2022, in or near the 200 block of West 23rd Street, Baltimore City, State of Maryland, the Defendant, did wear a handgun upon and about their person, in violation of the Criminal Law Article, Section 4-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-203] CJIS Code 1-5212
Misdemeanor
3 years – \$2,500

COUNT FOURTEEN
(RECKLESS ENDANGERMENT)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present on or about November 3, 2022, in or near the 200 block of West 23rd Street, Baltimore City, State of Maryland, the Defendant, did recklessly engage in conduct, to wit: pointing a firearm and demanding property, that created a substantial risk of death or serious physical injury to [REDACTED], in violation of the Criminal Law Article, Section 3-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-204] CJIS Code 1-1425
Misdemeanor
5 years – \$5000

COUNT FIFTEEN
(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 3, 2022, in or near the 200 block of West 23rd Street, Baltimore City, State of Maryland, the Defendant, did without permission, take and carry away out of the possession of [REDACTED], a gray 2007 Nissan Altima, with the intent to temporarily deprive [REDACTED] 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 SIXTEEN
(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 3, 2022, in or near the 200 block of West 23rd Street, Baltimore City, State of Maryland, the Defendant, did steal a gray 2007 Nissan Altima from [REDACTED], 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
Misdemeanor
5 years

COUNT SEVENTEEN
(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 3, 2022, in or near the 2300 block of Eutaw Place, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a black 2022 Nissan Altima from [REDACTED] 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 EIGHTEEN
(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 3, 2022, in or near the 2300 block of Eutaw Place, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a black 2022 Nissan Altima, from [REDACTED] who was then and there in actual possession of the motor vehicle, by threat of 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 NINETEEN
(ASSAULT – FIRST 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 3, 2022, in or near the 2300 block of Eutaw Place, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] in the first degree, in violation of the Criminal Law Article, Section 3-202, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-202] CJIS Code 1-1420
Felony
25 years

COUNT TWENTY
(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 3, 2022, in or near the 2300 block of Eutaw Place, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] 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-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 3, 2022, in or near the 2300 block of Eutaw Place, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously, with a dangerous weapon, rob [REDACTED], 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 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 3, 2022, in or near the 2300 block of Eutaw Place, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously rob [REDACTED] 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
(FIREARM – CRIME OF VIOLENCE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 3, 2022, in or near the 2300 block of Eutaw Place, Baltimore City, State of Maryland, the Defendant, did use a firearm in the commission of a crime of violence, to wit: robbery, in violation of the Criminal Law Article, Section 4-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-204] CJIS Code 1-5299
Misdemeanor
5-20 years, 5 years mandatory

COUNT TWENTY-FOUR
(HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 3, 2022, in or near the 2300 block of Eutaw Place, Baltimore City, State of Maryland, the Defendant, did wear a handgun upon and about their person, in violation of the Criminal Law Article, Section 4-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-203] CJIS Code 1-5212
Misdemeanor
3 years – \$2,500

COUNT TWENTY-FIVE
(RECKLESS ENDANGERMENT)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present on or about November 3, 2022, in or near the 2300 block of Eutaw Place, Baltimore City, State of Maryland, the Defendant, did recklessly engage in conduct, to wit: pointing a firearm and demanding property, that created a substantial risk of death or serious physical injury to [REDACTED] in violation of the Criminal Law Article, Section 3-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-204] CJIS Code 1-1425
Misdemeanor
5 years – \$5000

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 3, 2022, in or near the 2300 block of Eutaw Place, Baltimore City, State of Maryland, the Defendant, did without permission, take and carry away out of the possession of [REDACTED] a black 2022 Nissan Altima, with the intent to temporarily deprive [REDACTED] 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
(THEFT \$25,000-\$100,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about November 3, 2022, in or near the 2300 block of Eutaw Place, Baltimore City, State of Maryland, the Defendant, did steal a black 2022 Nissan Altima from [REDACTED] having a value of at least \$25,000 but less than \$100,000, 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 1-1135
Felony
\$15,000-10years

COUNT TWENTY-EIGHT
(ATTEMPTED 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 3, 2022, in or near the 2500 block of Brookfield Avenue, Baltimore City, State of Maryland, the Defendant, did attempt to obtain unauthorized possession of a motor vehicle, to wit: a white 2022 Nissan Altima, from [REDACTED], 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
(ATTEMPTED 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 3, 2022, in or near the 2500 block of Brookfield Avenue, Baltimore City, State of Maryland, the Defendant, did attempt to obtain unauthorized possession of a motor vehicle, to wit: a white 2022 Nissan Altima, from [REDACTED], who was then and there in actual possession of the motor vehicle, by threat of 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 THIRTY
(FIRST DEGREE MURDER)

The Jurors of the State of Maryland for the body of Baltimore County, do on their oath present that, the DEFENDANT, on or about November 3, 2022, in or near the 2500 block of Brookfield Avenue, Baltimore City, State of Maryland, did feloniously, willfully, and of deliberately premeditated malice aforethought, kill and murder [REDACTED], in violation of Criminal Law Article, Section 2-201 of the Maryland Code against the peace, government and dignity of the State.

[CR 2-201(a)(4)(iv)] CJIS Code 1-0990
Penalty: Felony
Life W/O.Poss. Parole

COUNT THIRTY-ONE
(CONSPIRACY TO COMMIT FIRST DEGREE MURDER)

The Jurors of the State of Maryland for the body of Baltimore County, do on their oath present that, the DEFENDANT, on or about November 3, 2022, in the City of Baltimore, and elsewhere in the State of Maryland, did conspire with others, known and unknown to the Jurors, to feloniously, willfully, and of deliberately premeditated malice aforethought, kill and murder [REDACTED] in violation of the common law of Maryland and Criminal Law Article, Section 2-201 of the Maryland Code against the peace, government, and dignity of the State.

[Common Law; CR 2-201] CJIS Code 1-0990
Penalty: Misdemeanor
Life

COUNT THIRTY-TWO
(SECOND DEGREE MURDER)

The Jurors of the State of Maryland for the body of Baltimore County, do on their oath present that, the DEFENDANT, on or about November 3, 2022, in or near the 2500 block of Brookfield Avenue, Baltimore City, State of Maryland, did feloniously and with malice aforethought, kill and murder [REDACTED] in violation of Criminal Law Article, Section 2-204 of the Maryland Code; against the peace, government and dignity of the State.

[CR 2-204] CJIS Code 1-1107
Penalty: Felony
40Y

COUNT THIRTY-THREE
(FIREARM – CRIME OF VIOLENCE)

The Jurors of the State of Maryland for the body of Baltimore County, do on their oath present that, the DEFENDANT, on or about November 3, 2022, in or near the 2500 block of Brookfield Avenue, Baltimore City, State of Maryland, did use a firearm, in the commission of a crime of violence, in violation of Criminal Law Article, Section 4-204(b) of the Maryland Code; against the peace, government and dignity of the State.

[CR 4-204(b)] CJIS Code 1-5299
Penalty: Misdemeanor
5Y-20Y (Mandatory 5Y W/O Parole)

COUNT THIRTY-FOUR
(ILLEGAL POSSESSION OF REGULATED FIREARM: PERSON UNDER 21)

The Jurors of the State of Maryland for the body of Baltimore County, do on their oath present that, the DEFENDANT, on or about November 3, 2022, in or near the 2500 block of Brookfield Avenue, Baltimore City, State of Maryland, did being under 21 years of age, possess a regulated firearm to wit: 9mm handgun in violation of Public Safety Article, Section 5-133(d) of the Maryland Code; against the peace, government and dignity of the State.

[PS 5-133(d)] CJIS Code 1-5285
Penalty: Misdemeanor
5Y/\$10,000

COUNT THIRTY-FIVE
(LOADED HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that, the DEFENDANT, on or about November 3, 2022, in or near the 2500 block of Brookfield Avenue, Baltimore City, of Maryland, did wear, carry, and transport a loaded handgun upon or about their person, in violation of Criminal Law Article, Section 4-203(a)(1)(v) of the Maryland Code; against the peace, government and dignity of the State..

[CR 4-203(a)(1)(v)] CJIS Code 1-1455
Penalty: Misdemeanor
3Y/\$2,500

COUNT THIRTY-SIX
(HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that, the DEFENDANT, On or about November 3, 2022, in or near the 2500 block of Brookfield Avenue, Baltimore City, State of Maryland State, did wear, carry, and transport a 40-caliber handgun, upon and about their person, in violation of Criminal Law Article, Section 4-203 of the Maryland Code; against the peace, government and dignity of the State.

[CR 4-203] CJIS Code 1-5212
Penalty: Misdemeanor
3Y/\$2,500

COUNT THIRTY-SEVEN
(THEFT OF MOTOR VEHICLE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 16, 2022, at or near 2602 Hampden Avenue, Baltimore City, State of Maryland, the Defendant, did unlawfully, knowingly, and willfully take out of [REDACTED]'s lawful custody, a motor vehicle, to wit: a blue 2014 Hyundai Santa Fe, without the consent of [REDACTED] in violation of the Criminal Law Article, Section 7-105, of the Maryland Code against the peace, government and dignity of the State.

[CR 7-105] CJIS Code 2-0480
Felony
\$5,000-5years

COUNT THIRTY-EIGHT
(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 December 16, 2022, at or near 2602 Hampden Avenue, Baltimore City, State of Maryland, the Defendant, did without permission, take and carry away out of the possession of [REDACTED] a blue 2014 Hyundai Santa Fe, with the intent to temporarily deprive [REDACTED] 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 THIRTY-NINE
(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 December 16, 2022, at or near 2602 Hampden Avenue, Baltimore City, State of Maryland, the Defendant, a blue 2014 Hyundai Santa Fe, and contents therein, of [REDACTED], 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
Misdemeanor
5 years

COUNT FORTY
(ATTEMPTED 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 December 17, 2022, at or near 501 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did attempt to obtain unauthorized possession of a motor vehicle, to wit: a 2021 Nissan Versa, from [REDACTED], 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 FORTY-ONE
(ATTEMPTED CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about December 17, 2022, at or near 501 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did attempt to obtain unauthorized possession of a motor vehicle, to wit: a 2021 Nissan Versa, from [REDACTED], who was then and there in actual possession of the motor vehicle, by threat of 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 FORTY-TWO
(ASSAULT – FIRST DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about December 17, 2022, at or near 501 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] in the first degree, in violation of the Criminal Law Article, Section 3-202, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-202] CJIS Code 1-1420
Felony
25 years

COUNT FORTY-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 December 17, 2022, at or near 501 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] 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-FOUR
(ATTEMPTED 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 December 17, 2022, at or near 501 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously, with a dangerous weapon, attempt to rob [REDACTED] 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-FIVE
(ATTEMPTED ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about December 17, 2022, at or near 501 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously attempt to rob [REDACTED] 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
(FIREARM – CRIME OF VIOLENCE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 17, 2022, at or near 501 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did use a firearm in the commission of a crime of violence, to wit: an attempted robbery, in violation of the Criminal Law Article, Section 4-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-204] CJIS Code 1-5299
Misdemeanor
5-20 years, 5 years mandatory

COUNT FORTY-SEVEN
(HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 17, 2022, at or near 501 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did wear a handgun upon and about their person, in violation of the Criminal Law Article, Section 4-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-203] CJIS Code 1-5212
Misdemeanor
3 years – \$2,500

COUNT FORTY-EIGHT
(RECKLESS ENDANGERMENT)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present on or about December 17, 2022, at or near 501 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did recklessly engage in conduct, to wit: pointing a firearm and demanding property, that created a substantial risk of death or serious physical injury to [REDACTED] in violation of the Criminal Law Article, Section 3-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-204] CJIS Code 1-1425
Misdemeanor
5 years – \$5000

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 December 17, 2022, in or near the 500 block of Macon Street, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a blue 2010 Nissan Altima, from [REDACTED], 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 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 December 17, 2022, in or near the 500 block of Macon Street, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a blue 2010 Nissan Altima, from [REDACTED] who was then and there in actual possession of the motor vehicle, by threat of 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
(ASSAULT – FIRST DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about December 17, 2022, in or near the 500 block of Macon Street, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] in the first degree, in violation of the Criminal Law Article, Section 3-202, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-202] CJIS Code 1-1420

Felony
25 years

COUNT FIFTY-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 December 17, 2022, in or near the 500 block of Macon Street, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] 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 FIFTY-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 December 17, 2022, in or near the 500 block of Macon Street, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously, with a dangerous weapon, attempt to rob [REDACTED] 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-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 December 17, 2022, in or near the 500 block of Macon Street, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously rob [REDACTED] 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-FIVE
(FIREARM – CRIME OF VIOLENCE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 17, 2022, in or near the 500 block of Macon Street, Baltimore City, State of Maryland, the Defendant, did use a firearm in the commission of a crime of violence, to wit: robbery, in violation of the Criminal Law Article, Section 4-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-204] CJIS Code 1-5299
Misdemeanor
5-20 years, 5 years mandatory

COUNT FIFTY-SIX
(HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 17, 2022, in or near the 500 block of Macon Street, Baltimore City, State of Maryland, the Defendant, did wear a handgun upon and about their person, in violation of the Criminal Law Article, Section 4-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-203] CJIS Code 1-5212
Misdemeanor
3 years – \$2,500

COUNT FIFTY-SEVEN
(RECKLESS ENDANGERMENT)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present on or about December 17, 2022, in or near the 500 block of Macon Street, Baltimore City, State of Maryland, the Defendant, did recklessly engage in conduct, to wit: pointing a firearm and demanding property, that created a substantial risk of death or serious physical injury to [REDACTED] in violation of the Criminal Law Article, Section 3-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-204] CJIS Code 1-1425
Misdemeanor
5 years – \$5000

COUNT FIFTY-EIGHT
(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 December 17, 2022, in or near the 500 block of Macon Street, Baltimore City, State of Maryland, the Defendant, did without permission, take and carry away out of the possession of [REDACTED] a blue 2010 Nissan Altima, with the intent to temporarily deprive [REDACTED] 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 FIFTY-NINE
(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 December 17, 2022, in or near the 500 block of Macon Street, Baltimore City, State of Maryland, the Defendant, a blue 2010 Nissan Altima, and contents therein, of [REDACTED] [REDACTED], 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
Misdemeanor
5 years

COUNT SIXTY
(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 December 17, 2022, in or near the 3700 block of Claremont Street, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously, with a dangerous weapon, rob [REDACTED] and [REDACTED], 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 SIXTY-FOUR
(FIREARM – CRIME OF VIOLENCE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 17, 2022, in or near the 3700 block of Claremont Street, Baltimore City, State of Maryland, the Defendant, did use a firearm in the commission of a crime of violence, to wit: robbery, in violation of the Criminal Law Article, Section 4-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-204] CJIS Code 1-5299
Misdemeanor
5-20 years, 5 years mandatory

COUNT SIXTY-FIVE
(HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 17, 2022, in or near the 3700 block of Claremont Street, Baltimore City, State of Maryland, the Defendant, did wear a handgun upon and about their person, in violation of the Criminal Law Article, Section 4-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-203] CJIS Code 1-5212
Misdemeanor
3 years – \$2,500

COUNT SIXTY-SIX
(RECKLESS ENDANGERMENT)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present on or about December 17, 2022, in or near the 3700 block of Claremont Street, Baltimore City, State of Maryland, the Defendant, did recklessly engage in conduct, to wit: pointing a firearm and demanding property, that created a substantial risk of death or serious physical injury to [REDACTED] and [REDACTED] in violation of the Criminal Law Article, Section 3-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-204] CJIS Code 1-1425
Misdemeanor
5 years – \$5000

COUNT SIXTY-SEVEN
(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 December 17, 2022, in or near the 3700 block of Claremont Street, Baltimore City, State of Maryland, the Defendant, did steal Dolce & Gabbana sneakers, Fossil watch, Christian Dior bag, Cartier glasses, a pair of Nike Air Jordans, and an apple iPhone Pro from [REDACTED] and [REDACTED] 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
Misdemeanor
5 years

COUNT SIXTY-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 December 17, 2022, in or near the 2300 block of East Fairmount Avenue, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2013 Nissan Altima, from [REDACTED] 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 SIXTY-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 December 17, 2022, in or near the 2300 block of East Fairmount Avenue, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2013 Nissan Altima, from [REDACTED] who was then and there in actual possession of the motor vehicle, by threat of 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 SEVENTY
(ASSAULT – FIRST DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about December 17, 2022, in or near the 2300 block of East Fairmount Avenue, Baltimore City, State of Maryland, the Defendant, [REDACTED], [REDACTED], and [REDACTED] in the first degree, in violation of the Criminal Law Article, Section 3-202, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-202] CJIS Code 1-1420
Felony
25 years

COUNT SEVENTY-ONE
(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 December 17, 2022, in or near the 2300 block of East Fairmount Avenue, Baltimore City, State of Maryland, the Defendant, [REDACTED], [REDACTED], and [REDACTED] 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 SEVENTY-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 December 17, 2022, in or near the 2300 block of East Fairmount Avenue, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously, with a dangerous weapon, rob [REDACTED], [REDACTED], and [REDACTED], 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 SEVENTY-THREE
(ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about December 17, 2022, in or near the 2300 block of East Fairmount Avenue, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously rob [REDACTED], [REDACTED], and [REDACTED] 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 SEVENTY-FOUR
(FIREARM – CRIME OF VIOLENCE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 17, 2022, in or near the 2300 block of East Fairmount Avenue, Baltimore City, State of Maryland, the Defendant, did use a firearm in the commission of a crime of violence, to wit: robbery, in violation of the Criminal Law Article, Section 4-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-204] CJIS Code 1-5299
Misdemeanor
5-20 years, 5 years mandatory

COUNT SEVENTY-FIVE
(HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 17, 2022, in or near the 2300 block of East Fairmount Avenue, Baltimore City, State of Maryland, the Defendant, did wear a handgun upon and about their person, in violation of the Criminal Law Article, Section 4-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-203] CJIS Code 1-5212
Misdemeanor
3 years – \$2,500

COUNT SEVENTY-SIX
(RECKLESS ENDANGERMENT)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present on or about December 17, 2022, in or near the 2300 block of East Fairmount Avenue, Baltimore City, State of Maryland, the Defendant, did recklessly engage in conduct, to wit: pointing a firearm and demanding property that created a substantial risk of death or serious physical injury to [REDACTED], [REDACTED] and [REDACTED], in violation of the Criminal Law Article, Section 3-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-204] CJIS Code 1-1425
Misdemeanor
5 years – \$5000

COUNT SEVENTY-SEVEN
(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 December 17, 2022, in or near the 2300 block of East Fairmount Avenue, Baltimore City, State of Maryland, the Defendant, did without permission, take and carry away out of the possession of [REDACTED] a gray 2013 Nissan Altima, with the intent to temporarily deprive [REDACTED] 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 SEVENTY-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 December 17, 2022, in or near the 2300 block of East Fairmount Avenue, Baltimore City, State of Maryland, the Defendant, did steal a gray 2013 Nissan Altima from [REDACTED] [REDACTED], 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
Misdemeanor
5 years

COUNT SEVENTY-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 December 30, 2022, in or near the 2200 block of Brookfield Avenue, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a silver 2000 Mercedes Benz SL 500 from [REDACTED] 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 EIGHTY
(CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, in or near the 2200 block of Brookfield Avenue, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a silver 2000 Mercedes Benz SL 500, from [REDACTED] who was then and there in actual possession of the motor vehicle, by threat of 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 EIGHTY-ONE
(ASSAULT – FIRST DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, in or near the 2200 block of Brookfield Avenue, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] in the first degree, in violation of the Criminal Law Article, Section 3-202, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-202] CJIS Code 1-1420
Felony
25 years

COUNT EIGHTY-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 December 30, 2022, in or near the 2200 block of Brookfield Avenue, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] 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 EIGHTY-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 December 30, 2022, in or near the 2200 block of Brookfield Avenue, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously, with a dangerous weapon, rob [REDACTED], 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 EIGHTY-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 December 30, 2022, in or near the 2200 block of Brookfield Avenue, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously rob [REDACTED] 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 EIGHTY-FIVE
(FIREARM – CRIME OF VIOLENCE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, in or near the 2200 block of Brookfield Avenue, Baltimore City, State of Maryland, the Defendant, did use a firearm in the commission of a crime of violence, to wit: robbery, in violation of the Criminal Law Article, Section 4-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-204] CJIS Code 1-5299
Misdemeanor
5-20 years, 5 years mandatory

COUNT EIGHTY-SIX
(HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, in or near the 2200 block of Brookfield Avenue, Baltimore City, State of Maryland, the Defendant, did wear a handgun upon and about their person, in violation of the Criminal Law Article, Section 4-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-203] CJIS Code 1-5212
Misdemeanor
3 years – \$2,500

COUNT EIGHTY-SEVEN
(RECKLESS ENDANGERMENT)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, in or near the 2200 block of Brookfield Avenue, Baltimore City, State of Maryland, the Defendant, did recklessly engage in conduct, to wit: pointing a firearm and demanding property, that created a substantial risk of death or serious physical injury to [REDACTED], in violation of the Criminal Law Article, Section 3-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-204] CJIS Code 1-1425
Misdemeanor
5 years – \$5000

COUNT EIGHTY-EIGHT
(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 December 30, 2022, in or near the 2200 block of Brookfield Avenue, Baltimore City, State of Maryland, the Defendant, did without permission, take and carry away out of the possession of [REDACTED], a silver 2020 Mercedes Benz SL 500, with the intent to temporarily deprive [REDACTED] 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 EIGHTY-NINE
(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 December 30, 2022, in or near the 2200 block of Brookfield Avenue, Baltimore City, State of Maryland, the Defendant, did steal a silver 2020 Mercedes Benz SL 500 from [REDACTED], 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
Misdemeanor
5 years

COUNT NINETY
(ATTEMPTED 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 December 30, 2022, in or near the 4000 block of Fleet Street, Baltimore City, State of Maryland, the Defendant, did attempt to obtain unauthorized possession of a motor vehicle, to wit: a red 2015 Toyota Corolla, from [REDACTED], 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 NINETY-ONE
(ATTEMPTED CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about December 30, 2022, in or near the 4000 block of Fleet Street, Baltimore City, State of Maryland, the Defendant, did attempt to obtain unauthorized possession of a motor vehicle, to wit: a red 2015 Toyota Corolla, from [REDACTED], who was then and there in actual possession of the motor vehicle, by threat of 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 NINETY-TWO
(ASSAULT – FIRST DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about December 30, 2022, in or near the 4000 block of Fleet Street, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] in the first degree, in violation of the Criminal Law Article, Section 3-202, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-202] CJIS Code 1-1420
Felony
25 years

COUNT NINETY-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 December 30, 2022, in or near the 4000 block of Fleet Street, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] 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 NINETY-FOUR
(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 December 30, 2022, in or near the 4000 block of Fleet Street, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously, with a dangerous weapon, rob [REDACTED] 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 NINETY-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 December 30, 2022, in or near the 4000 block of Fleet Street, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously rob [REDACTED] 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 NINETY-SIX
(FIREARM – CRIME OF VIOLENCE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, in or near the 4000 block of Fleet Street, Baltimore City, State of Maryland, the Defendant, did use a firearm in the commission of a crime of violence, to wit: a robbery, in violation of the Criminal Law Article, Section 4-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-204] CJIS Code 1-5299
Misdemeanor
5-20 years, 5 years mandatory

COUNT NINETY-SEVEN
(HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, in or near the 4000 block of Fleet Street, Baltimore City, State of Maryland, the Defendant, did wear a handgun upon and about their person, in violation of the Criminal Law Article, Section 4-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-203] CJIS Code 1-5212
Misdemeanor
3 years – \$2,500

COUNT NINETY-EIGHT
(RECKLESS ENDANGERMENT)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present on or about December 30, 2022, in or near the 4000 block of Fleet Street, Baltimore City, State of Maryland, the Defendant, did recklessly engage in conduct, to wit: pointing a firearm and demanding property, that created a substantial risk of death or serious physical injury to [REDACTED] in violation of the Criminal Law Article, Section 3-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-204] CJIS Code 1-1425
Misdemeanor
5 years – \$5000

COUNT NINETY-NINE
(THEFT \$100 – \$1,500)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, in or near the 4000 block of Fleet Street, Baltimore City, State of Maryland, the Defendant, did steal personal property, having a value of at least \$100 but less than \$1,500, 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 2-1137
Misdemeanor
6 Months

COUNT ONE HUNDRED
(SECOND DEGREE BURGLARY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, at or near 503 West Coldspring Lane, Baltimore City, State of Maryland, the Defendant, did break and enter the storehouse of Smoke District located at 503 West Coldspring Lane, Baltimore City, State of Maryland with the intent to commit a theft in violation of Criminal Law Article 6-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 6-203(a)] CJIS Code 2-3010

Felony

15 years

COUNT ONE HUNDRED ONE
(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 December 30, 2022, at or near 503 West Coldspring Lane, Baltimore City, State of Maryland, the Defendant, did steal \$510 in U.S. currency and several cases of CBD flour, 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

Misdemeanor

5 years

COUNT ONE HUNDRED TWO
(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 December 30, 2022, in or near the 3700 block of Falls Road, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a 2021 Toyota RAV-4 from [REDACTED] 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 ONE HUNDRED THREE
(CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about December 30, 2022, in or near the 3700 block of Falls Road, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a 2021 Toyota RAV-4, from [REDACTED] who was then and there in actual possession of the motor vehicle, by threat of 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 ONE HUNDRED FOUR
(ASSAULT – FIRST DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about December 30, 2022, in or near the 3700 block of Falls Road, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] in the first degree, in violation of the Criminal Law Article, Section 3-202, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-202] CJIS Code 1-1420
Felony
25 years

COUNT ONE HUNDRED FIVE
(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 December 30, 2022, in or near the 3700 block of Falls Road, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] 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 ONE HUNDRED 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 December 30, 2022, in or near the 3700 block of Falls Road, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously, with a dangerous weapon, rob [REDACTED] 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 ONE HUNDRED 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 December 30, 2022, in or near the 3700 block of Falls Road, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously rob [REDACTED] 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 ONE HUNDRED EIGHT
(FIREARM – CRIME OF VIOLENCE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, in or near the 3700 block of Falls Road, Baltimore City, State of Maryland, the Defendant, did use a firearm in the commission of a crime of violence, to wit: robbery, in violation of the Criminal Law Article, Section 4-204; of the Maryland Code against the peace, government and dignity of the State.

[CR 4-204] CJIS Code 1-5299
Misdemeanor
5-20 years, 5 years mandatory

COUNT ONE HUNDRED NINE
(HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, in or near the 3700 block of Falls Road, Baltimore City, State of Maryland, the Defendant, did wear a handgun upon and about their person, in violation of the Criminal Law Article, Section 4-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-203] CJIS Code 1-5212
Misdemeanor
3 years – \$2,500

COUNT ONE HUNDRED TEN
(RECKLESS ENDANGERMENT)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present on or about December 30, 2022, in or near the 3700 block of Falls Road, Baltimore City, State of Maryland, the Defendant, did recklessly engage in conduct, to wit: pointing a firearm and demanding property, that created a substantial risk of death or serious physical injury to [REDACTED], in violation of the Criminal Law Article, Section 3-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-204] CJIS Code 1-1425
Misdemeanor
5 years – \$5000

COUNT ONE HUNDRED ELEVEN
(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 December 30, 2022, in or near the 3700 block of Falls Road, Baltimore City, State of Maryland, the Defendant, did without permission, take and carry away out of the possession of [REDACTED], a 2021 Toyota RAV-4, with the intent to temporarily deprive [REDACTED] 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 ONE HUNDRED TWELVE
(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 December 30, 2022, in or near the 3700 block of Falls Road, Baltimore City, State of Maryland, the Defendant, did steal a 2021 Toyota RAV-4 from [REDACTED], 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
Misdemeanor
5 years

COUNT ONE HUNDRED THIRTEEN
(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 December 30, 2022, at or near 2422 Briarwood Road, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a silver 2018 Kia Niro and a black 2014 Dodge Journey from [REDACTED] 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 ONE HUNDRED FOURTEEN
(CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about December 30, 2022, at or near 2422 Briarwood Road, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a silver 2018 Kia Niro and a black 2014 Dodge Journey, from [REDACTED] who was then and there in actual possession of the motor vehicle, by threat of 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 ONE HUNDRED FIFTEEN
(ASSAULT – FIRST DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about December 30, 2022, at or near 2422 Briarwood Road, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] in the first degree, in violation of the Criminal Law Article, Section 3-202, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-202] CJIS Code 1-1420
Felony
25 years

COUNT ONE HUNDRED SIXTEEN
(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 December 30, 2022, at or near 2422 Briarwood Road, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] 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 ONE HUNDRED SEVENTEEN
(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 December 30, 2022, at or near 2422 Briarwood Road, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously, with a dangerous weapon, rob [REDACTED] 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 ONE HUNDRED 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 December 30, 2022, at or near 2422 Briarwood Road, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously rob [REDACTED] 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 ONE HUNDRED NINETEEN
(FIREARM – CRIME OF VIOLENCE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, at or near 2422 Briarwood Road, Baltimore City, State of Maryland, the Defendant, did use a firearm in the commission of a crime of violence, to wit: robbery, in violation of the Criminal Law Article, Section 4-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-204] CJIS Code 1-5299
Misdemeanor
5-20 years, 5 years mandatory

COUNT ONE HUNDRED TWENTY
(HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, at or near 2422 Briarwood Road, Baltimore City, State of Maryland, the Defendant, did wear a handgun upon and about their person, in violation of the Criminal Law Article, Section 4-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-203] CJIS Code 1-5212
Misdemeanor
3 years – \$2,500

COUNT ONE HUNDRED TWENTY-ONE
(RECKLESS ENDANGERMENT)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present on or about December 30, 2022, at or near 2422 Briarwood Road, Baltimore City, State of Maryland, the Defendant, did recklessly engage in conduct, to wit: pointing a firearm and demanding property, that created a substantial risk of death or serious physical injury to [REDACTED] in violation of the Criminal Law Article, Section 3-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-204] CJIS Code 1-1425
Misdemeanor
5 years – \$5000

COUNT ONE HUNDRED TWENTY-TWO
(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 December 30, 2022, at or near 2422 Briarwood Road, , Baltimore City, State of Maryland, the Defendant, did without permission, take and carry away out of the possession of [REDACTED], a silver 2018 Kia Niro and a black 2014 Dodge Journey, with the intent to temporarily deprive [REDACTED] 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 ONE HUNDRED TWENTY-THREE
(FIRST DEGREE BURGLARY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, the Defendant, did break and enter the dwelling house of [REDACTED], located at 2422 Briarwood Road, Baltimore City, State of Maryland, with the intent to commit theft in violation of Criminal Law Article, Section 6-202 of the Maryland Code against the peace, government and dignity of the State.

[CR 6-202(a)] CJIS Code 2-3000
Felony
20years

COUNT ONE HUNDRED TWENTY-FOUR
(THEFT \$25,000-\$100,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about December 30, 2022, at or near 2422 Briarwood Road, Baltimore City, State of Maryland, the Defendant, did steal a silver 2018 Kia Niro, a black 2014 Dodge Journey, Apple MacBook laptop, two Chromebook laptops, an Acer laptop, and an Apple iPhone 13 from [REDACTED], having a value of at least \$25,000 but less than \$100,000, 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 1-1135
Felony
\$15,000-10years

COUNT ONE HUNDRED TWENTY-FIVE
(SECOND DEGREE BURGLARY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about January 2, 2023, the Defendant, did break and enter the storehouse of Silver Moon II, located at 801 East Baltimore Street, Baltimore City, State of Maryland with the intent to commit a theft in violation of Criminal Law Article 6-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 6-203(a)] CJIS Code 2-3010
Felony
15 years

COUNT ONE HUNDRED TWENTY-SIX
(SECOND DEGREE BURGLARY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about January 2, 2023, the Defendant, did break and enter the storehouse of Tropical Smoothie Cafe, located at 1030 West 41st Street, Baltimore City, State of Maryland with the intent to commit a theft in violation of Criminal Law Article 6-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 6-203(a)] CJIS Code 2-3010
Felony
15 years

COUNT ONE HUNDRED TWENTY-SEVEN
(SECOND DEGREE BURGLARY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about January 2, 2023, the Defendant, did break and enter the storehouse of Bangin' Fish and Chicken, located at 8519 Liberty Road, Baltimore County, State of Maryland with the intent to commit a theft in violation of Criminal Law Article 6-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 6-203(a)] CJIS Code 2-3010

Felony
15 years

COUNT ONE HUNDRED TWENTY-EIGHT
(ATTEMPTED SECOND DEGREE BURGLARY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about January 2, 2023, the Defendant, attempted to break and enter the storehouse of Keller's Liquor, located at 865 West 36th Street, Baltimore City, State of Maryland with the intent to commit a theft in violation of Criminal Law Article 6-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 6-203(a)] CJIS Code 2-3010

Felony
15 years

COUNT ONE HUNDRED TWENTY-NINE
(SECOND DEGREE BURGLARY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about January 2, 2023, the Defendant, did break and enter the storehouse of Charmery Ice Cream, located at 801 West 36th Street, Baltimore City, State of Maryland with the intent to commit a theft in violation of Criminal Law Article 6-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 6-203(a)] CJIS Code 2-3010

Felony
15 years

COUNT ONE HUNDRED THIRTY
(RECKLESS ENDANGERMENT)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about January 14, 2023, in or near the 1100 block of Cleveland Street, Baltimore City, State of Maryland, the Defendant, did recklessly engage in conduct, to wit: discharging a firearm that created a substantial risk of death or serious physical injury in violation of the Criminal Law Article, Section 3-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-204] CJIS Code 1-1425
Misdemeanor
5 years – \$5000

COUNT ONE HUNDRED THIRTY-ONE
(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 January 14, 2023, at or near 601 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2015 Mercedes Benz C300 from [REDACTED] 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 ONE HUNDRED THIRTY-TWO
(CARJACKING)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about January 14, 2023, at or near 601 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a gray 2015 Mercedes Benz C300, from [REDACTED] who was then and there in actual possession of the motor vehicle, by threat of 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 ONE HUNDRED THIRTY-THREE
(ASSAULT – FIRST DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about January 14, 2023, at or near 601 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] in the first degree, in violation of the Criminal Law Article, Section 3-202, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-202] CJIS Code 1-1420
Felony
25 years

COUNT ONE HUNDRED THIRTY-FOUR
(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 January 14, 2023, at or near 601 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] 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 ONE HUNDRED THIRTY-FIVE
(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 January 14, 2023, at or near 601 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously, with a dangerous weapon, rob [REDACTED] 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 ONE HUNDRED THIRTY-SIX
(ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about January 14, 2023, at or near 601 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously rob [REDACTED] 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 ONE HUNDRED THIRTY-SEVEN
(FIREARM – CRIME OF VIOLENCE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about January 14, 2023, at or near 601 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did use a firearm in the commission of a crime of violence, to wit: robbery, in violation of the Criminal Law Article, Section 4-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-204] CJIS Code 1-5299
Misdemeanor
5-20 years, 5 years mandatory

COUNT ONE HUNDRED THIRTY-EIGHT
(HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about January 14, 2023, at or near 601 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did wear a handgun upon and about their person, in violation of the Criminal Law Article, Section 4-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-203] CJIS Code 1-5212
Misdemeanor
3 years – \$2,500

COUNT ONE HUNDRED THIRTY-NINE
(RECKLESS ENDANGERMENT)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present on or about January 14, 2023, at or near 601 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did recklessly engage in conduct, to wit: pointing a firearm and demanding property, that created a substantial risk of death or serious physical injury to [REDACTED] in violation of the Criminal Law Article, Section 3-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-204] CJIS Code 1-1425
Misdemeanor
5 years – \$5000

COUNT ONE HUNDRED FORTY
(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 January 14, 2023, at or near 601 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did without permission, take and carry away out of the possession of [REDACTED] a gray 2015 Mercedes Benz C300, with the intent to temporarily deprive [REDACTED] 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 ONE HUNDRED FORTY -ONE
(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 January 14, 2023, at or near 601 East 33rd Street, Baltimore City, State of Maryland, the Defendant, did steal a gray 2015 Mercedes Benz C300 from [REDACTED], 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
Misdemeanor
5 years

COUNT ONE HUNDRED FORTY-TWO
(THEFT OF MOTOR VEHICLE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about January 14, 2023, at or near 206 West Coldspring Lane, Baltimore City, State of Maryland, the Defendant, did unlawfully, knowingly, and willfully take out of [REDACTED]'s lawful custody, a motor vehicle, to wit: a white 2017 Mercedes Benz GLC 300, without the consent of [REDACTED] in violation of the Criminal Law Article, Section 7-105, of the Maryland Code against the peace, government and dignity of the State.

[CR 7-105] CJIS Code 2-0480
Felony
\$5,000-5years

COUNT ONE HUNDRED FORTY-THREE
(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 January 14, 2023, at or near 206 West Coldspring Lane, Baltimore City, State of Maryland, the Defendant, did without permission, take and carry away out of the possession of [REDACTED], a white 2017 Mercedes Benz GLC 300, with the intent to temporarily deprive [REDACTED] 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 ONE HUNDRED FORTY-FOUR
(THEFT \$25,000-\$100,000)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about January 14, 2023, at or near 206 West Coldspring Lane, Baltimore City, State of Maryland, the Defendant, did steal a white 2017 Mercedes Benz GLC 300 from [REDACTED], having a value of at least \$25,000 but less than \$100,000, 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 1-1135
Felony
\$15,000-10years

COUNT ONE HUNDRED FORTY-FIVE
(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 January 14, 2023, at or near in or near the 2500 block of Liberty Heights Avenue, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a blue 2016 Infiniti QX50 from [REDACTED] 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 ONE HUNDRED FORTY-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 January 14, 2023, at or near in or near the 2500 block of Liberty Heights Avenue, Baltimore City, State of Maryland, the Defendant, did obtain unauthorized possession of a motor vehicle, to wit: a blue 2016 Infiniti QX50, from [REDACTED] who was then and there in actual possession of the motor vehicle, by threat of 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 ONE HUNDRED FORTY-SEVEN
(ASSAULT – FIRST DEGREE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about January 14, 2023, at or near in or near the 2500 block of Liberty Heights Avenue, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] in the first degree, in violation of the Criminal Law Article, Section 3-202, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-202] CJIS Code 1-1420
Felony
25 years

COUNT ONE HUNDRED FORTY-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 January 14, 2023, at or near in or near the 2500 block of Liberty Heights Avenue, Baltimore City, State of Maryland, the Defendant, did assault [REDACTED] 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 ONE HUNDRED FORTY-NINE
(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 January 14, 2023, at or near in or near the 2500 block of Liberty Heights Avenue, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously, with a dangerous weapon, rob [REDACTED], 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 ONE HUNDRED FIFTY
(ROBBERY)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that on or about January 14, 2023, at or near in or near the 2500 block of Liberty Heights Avenue, Baltimore City, State of Maryland, the Defendant, did unlawfully and feloniously rob [REDACTED] 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 ONE HUNDRED FIFTY-ONE
(FIREARM – CRIME OF VIOLENCE)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about January 14, 2023, at or near in or near the 2500 block of Liberty Heights Avenue, Baltimore City, State of Maryland, the Defendant, did use a firearm in the commission of a crime of violence, to wit: robbery, in violation of the Criminal Law Article, Section 4-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-204] CJIS Code 1-5299
Misdemeanor
5-20 years, 5 years mandatory

COUNT ONE HUNDRED FIFTY-TWO
(HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about January 14, 2023, at or near in or near the 2500 block of Liberty Heights Avenue, Baltimore City, State of Maryland, the Defendant, did wear a handgun upon and about their person, in violation of the Criminal Law Article, Section 4-203, of the Maryland Code against the peace, government and dignity of the State.

[CR 4-203] CJIS Code 1-5212
Misdemeanor
3 years – \$2,500

COUNT ONE HUNDRED FIFTY-THREE
(RECKLESS ENDANGERMENT)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present on or about January 14, 2023, at or near in or near the 2500 block of Liberty Heights Avenue, Baltimore City, State of Maryland, the Defendant, did recklessly engage in conduct, to wit: pointing a firearm and demanding property, that created a substantial risk of death or serious physical injury to [REDACTED], in violation of the Criminal Law Article, Section 3-204, of the Maryland Code against the peace, government and dignity of the State.

[CR 3-204] CJIS Code 1-1425
Misdemeanor
5 years – \$5000

COUNT ONE HUNDRED FIFTY-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 January 14, 2023, in or near the 2500 block of Liberty Heights Avenue, Baltimore City, State of Maryland, the Defendant, did without permission, take and carry away out of the possession of [REDACTED], a blue 2016 Infiniti QX50, with the intent to temporarily deprive [REDACTED] 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 ONE HUNDRED FIFTY-FIVE
(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 January 14, 2023, in or near the 2500 block of Liberty Heights Avenue, Baltimore City, State of Maryland, the Defendant, did steal a blue 2016 Infiniti QX50 from [REDACTED], 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

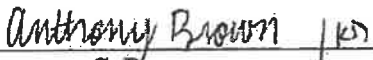
Misdemeanor


5 years

COUNT ONE HUNDRED FIFTY-SIX
(THEFT \$100 – \$1,500)

The Jurors of the State of Maryland for the body of the Baltimore County, do on their oath present that, on or about January 14, 2023, in or near the 2500 block of Liberty Heights Avenue, Baltimore City, State of Maryland, the Defendant, did steal a Smith & Wesson .380 handgun (SN:SD9VE) of [REDACTED], having a value of at least \$100 but less than \$1,500, 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 2-1137
Misdemeanor
6 Months


ANTHONY G. BROWN
Attorney General of Maryland


KRYSTLE L. SANDERS
Assistant Attorney General
Maryland Office of the Attorney General
200 St. Paul Street
Baltimore, Maryland 21202
(410) 382-7872
ksanders@oag.state.md.us

TO THE PERSON CHARGED:

1. This paper charges you with committing a crime.
2. If you have been arrested and remain in custody, you have the right to have a judicial officer decide whether you should be released from jail until your trial.
3. If you have been served with a citation or summons directing you to appear before a judicial officer for a preliminary inquiry at a date and time designated or within five days of service if no time is designated, a judicial officer will advise you of your rights, the charges against you, and penalties. The preliminary inquiry will be cancelled if a lawyer has entered an appearance to represent you.
4. You have the right to have a lawyer.
5. A lawyer can be helpful to you by:
 - (A) explaining the charges in this paper;
 - (B) telling you the possible penalties;
 - (C) explaining any potential collateral consequences of a conviction, including immigration consequences;
 - (D) helping you at trial;
 - (E) helping you protect your constitutional rights; and
 - (F) helping you get a fair penalty if convicted.
6. Even if you plan to plead guilty, a lawyer can be helpful.
7. If you are eligible, the Public Defender or a court-appointed attorney will represent you at any initial appearance before a judicial officer and at any proceeding under Rule 4-216.1 to review an order of a District Court commissioner regarding pretrial release. If you want a lawyer for any further proceeding, including trial, but do not have the money to hire one, the Public Defender may provide a lawyer for you. The court clerk will tell you how to contact the Public Defender.
8. If you want a lawyer but you cannot get one and the Public Defender will not provide one for you, contact the court clerk as soon as possible.
9. **DO NOT WAIT UNTIL THE DATE OF YOUR TRIAL TO GET A LAWYER.** If you do not have a lawyer before the trial date, you may have to go to trial without one.

Defendant

Date/Time