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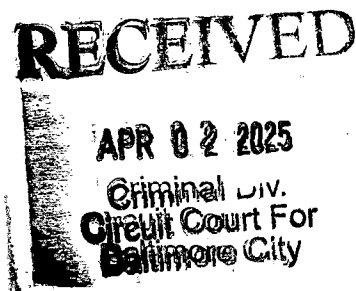
**IN THE CIRCUIT COURT FOR BALTIMORE CITY**

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**STATE OF MARYLAND**

v.


**TERRY CHEEKS**  
4505 Wakefield Road, Apt. B  
Baltimore, Maryland 21216  
D.O.B.: 06/04/2004, SID: 4690605



Tracking Number: 23-7024-00206-2

C-20-CR-25-001474

(TRUE BILL)

  
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GRAND JURY FOREPERSON

4/2/2025

FILED: April 2, 2025

CHARGES:

1. Participation in Criminal Organization (Maryland Criminal Law Article § 9-804(a))
2. Conspiracy to Distribute Controlled Dangerous Substances (Maryland Criminal Law Article § 5-602)
3. Illegal Possession of a Regulated Firearm (Maryland Public Safety Article § 5-133(b))
4. Illegal Possession of a Firearm – Minor (Maryland Public Safety Article § 5-133(d))
5. Handgun in Vehicle (Maryland Criminal Law Article § 4-203)
6. Handgun on Person (Maryland Criminal Law Article § 4-203)
7. Illegal Possession of Ammunition (Maryland Public Safety Article § 5-133.1)

WITNESS:

Investigator Jamal Brunson  
Office of the Attorney General  
200 St. Paul Place  
Baltimore, Maryland 21202

**Please issue a warrant and return for service to:**  
**Paul Halliday, Assistant Attorney General, (410) 576-6937**

STATE OF MARYLAND

v.

TERRY CHEEKS

*Defendant*

\* IN THE  
\* CIRCUIT COURT FOR  
\* BALTIMORE CITY  
\* CASE NO:

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## INDICTMENT

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

### COUNT ONE (PARTICIPATION IN A CRIMINAL ORGANIZATION)

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present, that aforesaid DEFENDANT, from on or about September 2024 through the present, in Baltimore City, Maryland, along with others known and unknown to the Jurors, did unlawfully participate in a criminal organization knowing that members of the said organization engage in a pattern of organized criminal activity; and knowingly and willfully directed and participated in an underlying crime committed for the benefit of, at the direction of, and in association with said criminal organization, in violation of Criminal Law Article, Sections 9-804 of the Maryland Code, against the peace, government, and dignity of the State.

### THE ENTERPRISE

1. Since at least September 2024, the DEFENDANT, co-defendants, co-conspirators, and others known and unknown have been members and associates of a criminal Enterprise that is operating in Baltimore City, Maryland (hereinafter, "the Enterprise"), and elsewhere.

2. The Enterprise consists of members and associates who individually and collectively work together to make money by selling controlled dangerous substances (hereinafter, "CDS"). The primary objectives and activities of the Enterprise include distribution of CDS, manufacturing of CDS, and the protection of geographical territory, CDS, and proceeds through the illegal possession of firearms and the wearing, carrying, and transportation of handguns.

3. The Enterprise primarily operates in the 4100 block of Morrison Court, and the surrounding area including the area encompassed by Pennington Avenue, Plum Street,

Morrison Court, and Grace Court, all in the Curtis Bay area of Southern Baltimore City. The Enterprise distributes CDS, including fentanyl, heroin, and cocaine. The area is a long-standing open air drug market and has been plagued by violence, including shootings and assaults, that are related to the drug trafficking activities in the area.

4. The members and associates of the Enterprise include, among others, Colby BROWN, Rashad BRYANT, Anthony CHEEKS, Terry CHEEKS, Andrew CLEMONS, Darico CUMMINGS, Rayquan FORD, Dorrell GROSS, Kairie HARRISON, Markel HAWKINS, Jaquan McCain, and Denise SMITH.

5. The Enterprise has an overt and covert organization and command structure with defined roles. These roles include supervisors of the Enterprise, managers of the stash and storage locations for CDS, suppliers of CDS, transporters of CDS, street level dealers of CDS, and enforcers who carry firearms in order to protect the interests of the Enterprise.

6. Anthony CHEEKS is a higher-ranking member of the Enterprise who supplies CDS to lower-ranking members of the Enterprise and transports CDS to managers of the stash locations for the storage of CDS.

7. Denise SMITH, Rayquan FORD, and Terry CHEEKS transport CDS to other members of the Enterprise for redistribution and act as street lieutenants, or higher-ranking managers in the Enterprise, under Anthony CHEEKS. Denise SMITH and Rayquan FORD transported Anthony CHEEKS between stash locations and street-level drug shops.

8. Colby BROWN, Rashad BRYANT, Andrew CLEMONS, and Markel HAWKINS are middle-level supervisors who obtain resupplies of CDS from higher-ranking members of the Enterprise and who manage stash locations for the storage and resale of CDS.

9. Andrew CLEMONS and Rayquan FORD possess firearms, including handguns, in the area of the operations and activities of the Enterprise in order to protect the financial interests of the members and associates of the Enterprise.

10. Darico CUMMINGS, Dorrell GROSS, Kairie HARRISON, Jaquan McCain, and other known and unknown members and associates of the Enterprise are lower-level, or street-level, redistributors of CDS for the Enterprise.

#### **MANNER, MEANS, AND METHODS OF THE ENTERPRISE**

11. The Enterprise seeks, among other things, to maintain control of the drug trade in its territory and to protect the members and operations of the Enterprise from interdiction and interruption by law enforcement. The manner, means, and methods by



which the Defendants and their associates achieve the objectives of the Enterprise include, but are not limited to, the following:

12. Members and associates of the Enterprise do, individually and collectively, distribute, possess with the intent to distribute, conspire to distribute, and conspire to possess with the intent to distribute, heroin, fentanyl, and cocaine, among other CDS, on behalf of the organization within and near the territory controlled by the organization.

13. Members and associates of the Enterprise do, individually and collectively, work together to sell CDS within the Enterprise's territory on a near-daily basis. Members and associates of the Enterprise complete transactions for one another, such as one member or associate of the Enterprise receiving the money for a drug deal and another member or associate of the Enterprise physically handing the drugs to the customer. Additionally, multiple members and associates of the Enterprise may provide CDS to a customer during a single transaction in order to evenly distribute profits. Higher-ranking members of the Enterprise also conduct CDS transactions to larger volume customers of the Enterprise, known historical customers, and to re-suppliers.

14. The customers of the Enterprise include foot traffic and vehicular traffic. Members and associates of the Enterprise conduct CDS transactions in the open, in alleys and behind residences, within abandoned or vacant properties, within stash locations, and in their vehicles, or the vehicles of other members or associates of the Enterprise, or their customers.

15. Members and associates of the Enterprise do, individually and collectively, supply one another with controlled dangerous substances to re-distribute to customers within the Enterprise's territory.

16. Members and associates of the Enterprise do, individually and collectively, work together to gather and count U.S. currency earned by distributing controlled dangerous substances on behalf of the Enterprise.

17. Members and associates of the Enterprise do, individually and collectively, look out for one another when completing drug sales, including notifying members and associates of the presence of law enforcement or alerting fellow members and associates of the Enterprise if they believe they may be unwittingly selling drugs to an undercover police officer.

18. Members and associates of the Enterprise do, individually and collectively, possess, wear, carry, and transport, and conspire to possess, wear, carry, and transport firearms. These members and associates of the Enterprise possess firearms, including regulated firearms, even though most of them are disqualified from possessing firearms

due to prior convictions, and do so, among other reasons, in order to protect themselves, their CDS supply, and their CDS proceeds.

19. Members and associates of the Enterprise, individually and collectively, use cellular telephones to communicate with one another and with the Enterprise's customers.

20. Members and associates of the Enterprise, individually and collectively, alert other members about the presence of police in the area and will attempt to conceal criminal acts if they believe they are under surveillance, in order to prevent detection and intervention by law enforcement.

21. Members and associates of the Enterprise, individually and collectively, utilize the homes of members and associates to stash, store, and safeguard illegal drugs, weapons, and proceeds.

22. Members and associates of the Enterprise, individually and collectively, utilize vehicles to transport CDS and CDS proceeds from their homes and stash locations to provide to one another for re-distribution or to be directly distributed to customers.

23. Members and associates of the Enterprise utilize several residences, their curtilages, and other properties as "stash locations," where they store CDS and weapons for safekeeping, and where they prepare CDS for street-level distribution. Members of the Enterprise utilize these stash locations, frequently retrieving CDS from inside the stash location before distributing CDS to customers or other members for re-distribution.

24. Members and associates of the Enterprise utilize vacant and abandoned properties, including the curtilage of those properties, in order to store CDS and weapons for safekeeping. Members and associates of the Enterprise who are engaged in the street-level of redistribution of CDS frequently stash CDS and weapons around these vacant and abandoned properties in the vicinity of the 4100 block of Morrison Court.

25. Members and associates of the Enterprise are conscious of law enforcement presence in the area of their operations and activities and employ counter surveillance techniques when driving or transporting CDS in order to make it more difficult to performance surveillance of their illicit activities.

26. The CDS distributed by the Enterprise contains fentanyl, para-fluorofentanyl (a synthetic opioid that is more potent than fentanyl and is a schedule I narcotic), heroin, 4-anilino-N-phenethylpiperidine) (or "4-ANPP" which is a chemical precursor for fentanyl and is a schedule II narcotic), cocaine, and cocaine base (or "crack"-cocaine), among other substances.

## OVERT ACTS IN FURTHERANCE OF THE ENTERPRISE

27. In furtherance of the Enterprise and to achieve the objectives thereof—and for the benefit of, at the direction of, and in association with the Enterprise—the DEFENDANT, co-defendants, co-conspirators, and others known and unknown, knowingly and willfully directed, participated in, performed, and caused to be performed the following acts, among others, in Baltimore City, Maryland:

28. From at least September 2024 through the present date, members and associates of the Enterprise repeatedly conducted hand to hand drug transactions of CDS in exchange for U.S. currency and other electronic payments in the geographical territory controlled by the Enterprise, particularly in and around the 4100 block of Morrison Court. Members and associates of the Enterprise conducted CDS transactions at most hours of the day. Member and associates of the Enterprise sold primarily fentanyl, heroin, and cocaine.

29. From at least September 2024 through the present date, on a nearly daily basis, Anthony CHEEKS drove to the area of the geographical territory of the Enterprise, including the area of the 4100 block of Morrison Court. CHEEKS frequently traveled between the 4100 block of Morrison Court and other known stash or manufacturing locations for CDS. While in the area of the 4100 block of Morrison Court, on a nearly basis, Anthony CHEEKS delivered resupplies of CDS to members and associates of the Enterprise and received U.S. currency. Members and associates of the Enterprise, including Denise SMITH and Rayquan FORD sometimes drove CHEEKS to and from the 4100 block of Morrison Court, or entered CHEEKS' vehicle when he arrived in order to exchange CDS and U.S. currency.

30. On or about October 10, 2024, at or near the 4100 block of Morrison Court, several members and associates of the Enterprise, including Andrew CLEMONS and Colby BROWN, worked together to distribute CDS.

31. On or about October 10, 2024, in the area of the 4100 block of Morrison Court, Andrew CLEMONS distributed cocaine base in a yellow container to Joseph Robinson.

32. On or about October 10, 2024, in the area of the 4100 block of Morrison Court, Colby BROWN distributed cocaine base in an identical yellow container to Ronald Coleman. Coleman then distributed the cocaine base to Moneka Carroll.

33. On or about October 10, 2024, in the area of the 4100 block of Morrison Court, Colby BROWN distributed four purple gel capsules and two black and white gel capsules, all containing fentanyl, 4-ANPP, and cocaine, to Derek Chenowith.



34. On or about October 22, 2024, in the area of the 4100 block of Morrison Court, Colby BROWN distributed four purple gel capsules containing fentanyl, 4-ANPP, and cocaine to an undercover detective.

35. On or about October 22, 2024, in the area of the 4100 block of Morrison Court, an unknown member or associate of the Enterprise distributed twelve gray containers of cocaine base to an undercover detective.

36. On or about October 23, 2024, in the area of the 4100 block of Morrison Court, members and associates of the Enterprise, including Markel HAWKINS and Colby BROWN, possessed a "ground stash" of 19 purple gel capsules of fentanyl, 4-ANPP, and cocaine, as well as 15 yellow containers of cocaine base.

37. On or about October 23, 2024, in the area of the 4100 block of Morrison Court, members and associates of the Enterprise, including Markel HAWKINS and Colby BROWN, worked together to conduct several hand-to-hand CDS transactions with customers. BROWN and HAWKINS retrieved CDS from the "ground stash" on several of those transactions before handing the CDS to the customer. On one occasion, both BROWN and HAWKINS handed CDS to a customer. After the transaction, HAWKINS gave U.S. currency to BROWN.

38. On or about October 24, 2024, in the area of the 4200 block of Grace Court, Jaquan McCAIN possessed a large stash of CDS, including 35 black containers of cocaine base, 26 red containers of cocaine base, and 7 dark green capsules containing fentanyl, para-fluorofentanyl, heroin, 4-ANPP, and cocaine.

39. On or about November 5, 2024, in the area of the 4100 block of Morrison Court, Colby BROWN and Markel HAWKINS distributed four gel capsules containing fake CDS to an undercover detective.

40. On or about November 5, 2024, in the area of the 4100 block of Morrison Court, Markel HAWKINS distributed five white and blue gel capsules containing fentanyl, heroin, and 4-ANPP and one pink container of cocaine base to Randy Waddell.

41. On or about November 6, 2024, in the area of the 4100 block of Morrison Court, thirteen shots were fired by at least three different firearms.

42. On or about November 10, 2024, Anthony CHEEKS and Denise SMITH traveled together to the area of the 4100 block of Morrison Court to supervise the operations of the Enterprise and resupply the members and associates of the Enterprise,

43. On or about November 13, 2024, in the area of the 4100 block of Morrison Court, Terry CHEEKS resupplied the Enterprise with yellow containers of cocaine base.

44. On or about November 14, 2024, in the area of the 4100 block of Morrison Court, Anthony CHEEKS resupplied members and associates of the Enterprise, including Jaquan McCain and Andrew CLEMONS. CLEMONS also provided U.S. currency to Anthony CHEEKS.

45. On or about November 14, 2024, in the area of the 4100 block of Morrison Court, members and associates of the Enterprise, including Jaquan McCain and Andrew CLEMONS, distributed CDS to multiple customers.

46. On or about November 15, 2024, in the area of 4113 Morrison Court, Markel HAWKINS possessed a handgun. Markel HAWKINS stashed the handgun under the porch of the residence at 4113 and then retrieved the handgun and carried it on his person in his waistband.

47. On or about November 19, 2024, in the area of the 4100 block of Morrison Court, the Enterprise possessed a large stash of CDS including 120 black containers, 598 red and black capsules, 153 purple capsules, 270 green capsules, 16 black and orange capsules, 1 orange capsule, and 1 red and orange capsule.

48. On or about November 21, 2024, in the area of the 4100 block of Morrison Court, members and associates of the Enterprise, including Denise SMITH, Rayquan FORD, and Markel HAWKINS, distribute CDS to customers.

49. On or about November 22, 2024, in the area of the 4100 block of Morrison Court, a member or associate of the Enterprise collected a CDS stash from a hidden location in order to hide the stash from police who were present in the area. The individual fled the area in the passenger area of Anthony CHEEKS' vehicle.

50. On or about December 4, 2024, in the area of the 4100 block of Morrison Court, Rayquan FORD distributed CDS to customers from a hidden stash location in a trash can.

51. On or about December 4, 2024, in the area of the 4100 block of Morrison Court, Terry CHEEKS and Rayquan FORD organized a CDS transaction with a customer. Terry CHEEKS then stayed with the customer in the alley while FORD retrieved CDS from Denise SMITH who was in Anthony CHEEKS' vehicle. FORD then distributed the CDS to the customer in exchange for U.S. currency.

52. On or about December 4, 2024, in the area of the 4100 block of Morrison Court, Anthony CHEEKS distributed CDS to two customers. On one occasion, the customer handed U.S. currency to Anthony CHEEKS and then Terry CHEEKS delivered the CDS to the customer.

53. On or about December 4, 2024, in the area of the 4100 block of Morrison Court, Colby BROWN distributed CDS to a customer. After obtaining the U.S. currency, BROWN retrieved the CDS from a "ground stash" location next to a residence in the block and distributed the CDS to the customer.

54. On or about December 5, 2024, in the area of the 4100 block of Morrison Court, a member or associate of the Enterprise distributed four blue and white gel capsules containing fentanyl, heroin, and 4-ANPP to Dawn Shaffer.

55. On or about December 5, 2024, in the area of the 4100 block of Pennington Avenue, Terry CHEEKS possessed 22 gray containers of cocaine base.

56. On or about December 5, 2024, in the area of 4113 Morrison Court, Andrew CLEMONS removed a handgun from his waistband and concealed it beneath the porch of the residence. That handgun had been used to fire five of the thirteen shots that were discharged in the same area on November 6, 2024.

57. On or about December 7, 2024, in the area of the 1500 block of Plum Street, Darico CUMMINGS possessed 32 containers of cocaine, approximately 8.8 grams of heroin, a digital scale with CDS residue, a razor blade with CDS residue, and three cellular phones.

58. On or about December 9, 2024, Anthony CHEEKS traveled to a music store at or near 6336 Marlboro Pike in District Heights, Maryland. CHEEKS was in the business for approximately three minutes before exiting with a brown paper bag and traveling back to Baltimore City, Maryland.

59. On or about December 16, 2024, Anthony CHEEKS delivered CDS manufacturing equipment to a member or associate of the Enterprise in the area of 1510 Mosher Street.

60. On or about December 18, 2024, in the area of the 4100 block of Morrison Court, Anthony CHEEKS resupplied the Enterprise with CDS.

61. On or about December 18, 2024, in the area of the 4100 block of Morrison Court, Jaquan McCAIN distributed eight purple and black gel capsules containing fake CDS to an undercover detective.

62. On or about December 19, 2024, in the area of 1510 Mosher Street, Anthony CHEEKS exchanged items with a member or associate of the Enterprise within the residence.

63. On or about December 19, 2024, in the area of 2 Meteor Court, Parkville, Baltimore County, Maryland, Jacquan McCAIN possessed approximately two grams of a CDS mixture containing fentanyl and heroin, 153 empty gel capsules used for the packaging of CDS, other CDS paraphernalia including glass measuring cups and a sifter, a loaded Childers Guns CGI AK47, an empty 9mm handgun magazine, two rounds of 9mm ammunition, a "glock switch" (used to convert a semi-automatic handgun into an automatic machine gun), and \$525 in U.S. currency.

64. On or about December 21, 2024, in the area of 1510 Mosher Street, Anthony CHEEKS retrieved a black bag from a member or associate of the Enterprise.

65. On or about December 23, 2024, in the area of 1510 Mosher Street, Anthony CHEEKS delivered a black bag to a member or associate of the Enterprise.

66. On or about January 1, 2025, in the area of 1510 Mosher Street, Anthony CHEEKS retrieved a bag from a member or associate of the Enterprise.

67. On or about January 2, 2025, Anthony CHEEKS travels between multiple locations including 1510 Mosher Street and the area of the 4100 block of Morrison Court.

68. On or about January 2, 2025, in the area of the 4100 block of Morrison Court, Anthony CHEEKS distributed four clear gel capsules containing fentanyl and 4-ANPP to Thomas Curley.

69. On or about January 2, 2025, in the area of the 4100 block of Morrison Court, Rashad BRYANT distributed four containers of cocaine base to David Kropf.

70. On or about January 2, 2025, in the area of the 4100 block of Morrison Court, Rashad BRYANT distributed two green gel capsules containing fake CDS to Joshua Sherrin.

71. On or about January 5, 2025, in the area of 600 E. Patapsco Avenue, Terry CHEEKS attempted to flee and elude police during a traffic stop. Terry CHEEKS crashed his vehicle. Terry CHEEKS was in possession of a handgun.

72. On or about January 6, 2025, through on or about January 7, 2025, Terry CHEEKS communicated with Anthony CHEEKS about the arrest of Terry CHEEKS.

73. On or about January 9, 2025, in the area of the 4100 block of Morrison Court, Kairie Harrison distributed four green gel capsules containing fentanyl to an undercover detective.

74. On or about January 12, 2025, in the area of the 4100 block of Morrison Court, Rayquan FORD and Rashad BRYANT distributed CDS to a customer in exchange for U.S. currency. During the transaction, the customer handed the money to BRYANT and then both BRYANT and FORD handed CDS to the customer. After the transaction, BRYANT and FORD exchanged U.S. currency with each other.

75. On or about January 12, 2025, in the area of the 4100 block of Morrison Court, Denise SMITH drove into the area and met with Rayquan FORD and Rashad BRYANT. Denise SMITH then conducted two CDS transactions with customers.

76. On or about January 13, 2025, in the area of the 4100 block of Morrison Court, members and associates of the enterprise, including Denise SMITH, Rayquan FORD, and Rashad BRYANT, worked together to distribute CDS. Anthony CHEEKS also arrived in the area and met with Denise SMITH.

77. On or about January 16, 2025, in the area of 1510 Mosher Street, Anthony CHEEKS picked up an object from a member or associate of the Enterprise. While in the area, another member or associate of the Enterprise arrived and provided another object to Anthony CHEEKS.

78. On or about January 17, 2025, in the area of the 4100 block of Morrison Court, Anthony CHEEKS entered a vacant and abandoned house. CHEEKS then proceeded to conduct at least three hand-to-hand CDS transactions in exchange for U.S. currency.

79. On or about January 18, 2025, in the area of the 4100 block of Morrison Court, Anthony CHEEKS conducted CDS transactions with customers out of his vehicle while Rashad BRYANT is in the vehicle with him.

80. On or about January 20, 2025, in the area of 1510 Mosher Street, Anthony CHEEKS entered the residence with a bag.

81. On or about January 21, 2025, in the area of the 4100 block of Morrison Court, Denise SMITH and Anthony CHEEKS resupplied members and associates of the Enterprise with CDS.

82. On or about January 21, 2025, in the area of the 4100 block of Morrison Court, Anthony CHEEKS distributed a purple container of cocaine base to Danielle Whittington.

83. On or about January 24, 2025, in the area of the 4100 block of Morrison Court, Rayquan FORD was seated in the passenger seat of Anthony CHEEKS' vehicle. When two marked police vehicles drove through the area, FORD exited the vehicle and

threw a plastic bag containing CDS into a trash can. After the police left the area, FORD retrieved the bag and carried it into the residence at 4113 Morrison Court.

84. On or about January 25, 2025, Anthony CHEEKS entered the residence at 4101 Morrison Court. CHEEKS then distributed CDS to two customers outside of the residence.

85. On or about January 27, 2025, in the area of the 4100 block of Morrison Court, Andrew CLEMONS distributed CDS to customers.

86. On or about January 27, 2025, in the area of the 4100 block of Morrison Court, Darico CUMMINGS distributed twelve black and white gel capsules containing fentanyl to an undercover detective.

87. On or about January 28, 2025, in the area of 1510 Mosher Street, Anthony CHEEKS entered the residence with a bag and later exited with the same bag.

88. On or about January 28, 2025, in the area of the 1600 block of Plum Street, Dorrell GROSS distributed a container of cocaine base to Todd Sherlock.

89. On or about January 28, 2025, in the area of the 1600 block of Plum Street, Dorrell GROSS and Denise SMITH distributed a container of cocaine base to James Eorio.

90. On or about January 28, 2025, in the area of the 1600 block of Plum Street, Dorrell GROSS and Denise SMITH worked together to distribute CDS to several customers.

91. On or about January 31, 2025, in the area of the 4100 block of Morrison Court, Andrew CLEMONS and Darico CUMMINGS, worked together to distribute CDS to multiple customers. CLEMONS and CUMMINGS were in and around the same vehicle and, at some point, CUMMINGS handed U.S. currency to CLEMONS.

92. On or about February 1, 2025, Anthony CHEEKS delivered items to an apartment at 828 Abbott Court.

93. On or about February 3, 2025, Anthony CHEEKS and Denise SMITH entered the residence at 4101 Morrison Court.

94. On or about February 3, 2025, Denise SMITH and Dorrell GROSS communicated with each other in the area of the 4100 block of Morrison COURT.

95. On or about February 3, 2025, in the area of the 4100 block of Morrison Court, Denise SMITH distributed a yellow cone of cocaine base to Donald Holleman.

96. On or about February 3, 2025, in the area of the 4100 block of Morrison Court, Denise SMITH distributed a yellow cone of cocaine base, a purple cone of cocaine base, and eight pink and yellow gel capsules containing fentanyl to Clifford Phillips.

97. On or about February 3, 2025, in the area of the 4100 block of Morrison Court, Denise SMITH and Dorrell GROSS worked together to distribute two clear gel capsules containing fentanyl to Sarah Cummings.

98. On or about February 4, 2025, in the area of the 4100 block of Morrison Court, Anthony CHEEKS distributed CDS to a customer in exchange for electronic payment.

99. On or about February 4, 2025, in the area of the 4100 block of Morrison Court, Darico CUMMINGS conducted multiple CDS transactions. On one occasion, CUMMINGS exited 4113 Morrison Court before conducting a CDS transaction.

100. On or about February 4, 2025, in the area of 4101 Pennington Avenue, Anthony CHEEKS distributed one gel capsule containing fentanyl and one container of cocaine base to Hilbert Roberts.

101. On or about February 4, 2025, in the area of the 4100 block of Morrison Court, Dorrell GROSS and Darico CUMMINGS worked together to distribute CDS to a customer.

102. On or about February 4, 2025, Andrew CLEMONS was dropped off by a vehicle in the area of the 4100 block of Morrison Court. Immediately after being dropped off, CLEMONS stashed a handgun under the front porch of the residence at 4113 Morrison Court. CLEMONS then communicated with Darico CUMMINGS.

103. On or about February 5, 2025, in the area of the 4100 block of Morrison Court, members and associates of the Enterprise, including Rashad BRYANT and Carico CUMMINGS, conducted several CDS transactions. Anthony CHEEKS and Rayquan FORD arrived in the area to resupply the Enterprise with CDS. Rayquan FORD concealed a stash of 58 cones of cocaine base in the porch at 4107 Morrison Court.

104. On or about February 10, 2025, in the area of the 4100 block of Morrison Court, Darico CUMMINGS distributed twelve blue and white gel capsules of fentanyl to an undercover detective.

105. On or about February 11, 2025, Anthony CHEEKS traveled directly from the area of 1510 Mosher Street to the 4100 block of Morrison Court where he supplied Darico CUMMINGS with CDS for redistribution. Anthony CHEEKS then entered the residence at 4101 Morrison Court. Anthony CHEEKS later conducted multiple CDS transactions from his vehicle.

106. On or about February 13, 2025, in the area of the 4100 block of Morrison Court, Denise SMITH and Dorrell GROSS worked together to distribute CDS to multiple customers.

107. On or about February 13, 2025, in the area of the 4100 block of Morrison Court, Rashad BRYANT distributed two gray containers of cocaine base and nine yellow and white gel capsules containing fentanyl to George Devore.

108. On or about March 4, 2025, at or near 118 North Howard Street, Baltimore City, Maryland, Anthony CHEEKS possessed approximately four hundred sixty grams of cocaine base, five boxes of baking soda, two pills of 3,4-Methylenedioxymethamphetamine, five digital scales, eight 9mm cartridges, and \$16,500 of U.S. currency.

109. On or about March 4, 2025, at or near the 1600 block of Plum Street, Baltimore City, Maryland, Anthony CHEEKS possessed forty containers with cocaine base, approximately twenty-six grams of cocaine base, twelve capsules containing heroin and fentanyl, approximately twenty grams of cannabis, a container of psilocybin, an auto sear switch, and \$662 of U.S. currency.

110. On or about March 4, 2025, at or near 4113 Morrison Court, Baltimore City, Maryland, Rashad BRYANT and Darico CUMMINGS possessed thirty-five gel capsules of heroin and fentanyl, sixteen flip-top containers with cocaine base, four pills of MDMA, packaging material, three gel capsule presses, a digital scale, and \$3,939 in U.S. currency.

111. On or about March 4, 2025, at or near 126 Akin Circle, Middle River, Baltimore County, Maryland, Andrew CLEMONS possessed a Glock automatic pistol, an auto sear switch, a twenty-five round (extended) magazine, eighteen cartridges of .45 Auto ammunition, and \$1,890 in U.S. currency.

112. On or about March 4, 2025, at or near the 1200 block of Pine Heights Avenue, Baltimore, Maryland, Denise SMITH possessed a Taurus handgun, twenty-seven cartridges of .380 ammunition, packaging material, a scale, and eleven gel capsules of heroin and fentanyl.



113. On or about March 22, 2025, at or near the 4100 block of Morrison Court, Baltimore City, Maryland, Dorrell GROSS possessed ten jug containers of cocaine base and \$224 in U.S. currency.

*[CR 9-804(a)]*

*CJIS 1-1395*

*Felony: 15 years and/or \$1,000,000 fine.*

### **COUNT TWO**

#### **(CONSPIRACY TO DISTRIBUTE CONTROLLED DANGEROUS SUBSTANCES)**

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that the aforesaid DEFENDANT, from on or about September 2024 through the present, in Baltimore City, Maryland, did unlawfully conspire with other persons whose names are known and unknown to the Jurors to distribute controlled dangerous substances, including, but not limited to, Fentanyl (Schedule II), Heroin (Schedule I), Cocaine (Schedule II), and cocaine base (Schedule II) in violation of the Criminal Law Article, Section 5-602 and 5-608 of the Maryland Code, in violation of the Common Law; 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; CR 5-602, 5-608]*

*CJIS 1C1118*

*Misdemeanor: 20 years and/or \$15,000 fine.*

**COUNT THREE**  
**(REGULATED FIREARM – ILLEGAL POSSESSION)**

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present, that aforesaid DEFENDANT, on or about January 5, 2025, at or near the 1400 block of West Patapsco Avenue, Baltimore City, Maryland, did knowingly possess a regulated firearm, to wit: a Glock handgun, after being convicted of a disqualifying crime to wit: possession of a firearm by a minor, a violation classified as a misdemeanor in the State that carries a statutory penalty of more than 2 years, in violation of Public Safety Article, Section 5-133(b) of the Maryland Code, against the peace, government, and dignity of the State.

*[PS 5-133(b)]*

*CJIS 1-1106*

*Misdemeanor: 5 years and/or \$10,000 fine.*

**COUNT FOUR**  
**(POSSESSION OF FIREARM BY A MINOR)**

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present, that aforesaid DEFENDANT, on or about January 5, 2025, at or near the 1400 block of West Patapsco Avenue, Baltimore City, Maryland, did being under 21 years of age, unlawfully possess a firearm, to wit: a Glock 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 1-5285*

*Misdemeanor: 5 years and/or \$10,000 fine.*

**COUNT FIVE**  
**(HANDGUN IN VEHICLE)**

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present, that aforesaid DEFENDANT, on or about January 5, 2025, at or near the 1400 block of West Patapsco Avenue, Baltimore City, Maryland, did unlawfully wear, carry, and knowingly transport a handgun, to wit: a Glock handgun, in a vehicle upon the public roads, highways, waterways, airways, or parking lots generally used by the public 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 1-1783*

*Misdemeanor: 5 years and/or \$2,500 fine, with a mandatory minimum of 30 days and/or \$250 fine.*

**COUNT SIX**  
**(HANDGUN ON PERSON)**

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present, that aforesaid DEFENDANT, on or about January 5, 2025, at or near the 1400 block of West Patapsco Avenue, Baltimore City, Maryland, did unlawfully wear, carry, and knowingly transport a handgun, to wit: a Glock handgun, on 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 1-1785*

*Misdemeanor: 5 years and/or \$2,500 fine, with a mandatory minimum of 30 days and/or \$250 fine.*

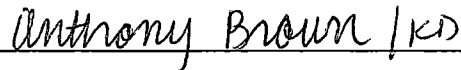
**COUNT SEVEN**  
**(AMMUNITION – ILLEGAL POSSESSION)**

The Jurors of the State of Maryland for the body of Baltimore City, do on their oath present that the aforesaid DEFENDANT, on or about January 5, 2025, at or near the 1400 block of West Patapsco Avenue, Baltimore City, Maryland, did unlawfully possess ammunition, being prohibited from possessing a regulated firearm under Public Safety Article, Section 5-133(b) of the Maryland Code, in violation of Public Safety Article, Section 5-133.1 of the Maryland Code, against the peace, government, and dignity of the State.

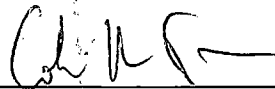
*[PS 5-133.1]*

*CJIS 1-1285*

*Misdemeanor: 1 year and/or \$5,000 fine*

  
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ANTHONY G. BROWN  
Maryland Attorney General

  
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**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 4-216.2 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. To apply for Public Defender representation, contact a District Court commissioner.
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