# STATE OF MARYLAND \*

IN THE

## **CIRCUIT COURT**

**CY'JUAN HEMSLEY** 

Defendant

#### FOR ANNE ARUNDEL COUNTY

# <u>CASE NO: C-02-CR-24-000813</u>

#### INDICTMENT

The Grand Jurors for the State of Maryland for Anne Arundel County charge:

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#### <u>COUNT ONE</u> (PARTICIPATION IN A CRIMINAL ORGANIZATION)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that, the aforesaid DEFENDANT, from at least December 2023, through March 2024, in Anne Arundel County, Prince George's County, Baltimore County, and elsewhere in Maryland, along with others, known and unknown to the Jurors, did unlawfully participate in a criminal organization, knowing that the members of 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, Section 9-804(a) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

#### THE ENTERPRISE

1. From at least December 2023, through March 2024, the Defendants and others, known and unknown, were members and associates of a criminal enterprise that was operating in Anne Arundel County, Prince George's County, Baltimore County, and elsewhere in Maryland.

2. The known members of the Enterprise include Cy'Juan HEMSLEY, Juvenile #1 Mahkiya MCQUINN-WOODLEY, and Juvenile #2 The known members of the organization worked with others, known and unknown, to operate a criminal organization which committed a string of commercial burglaries of Federal Firearm Licensed (FFL) stores. During these commercial burglaries, the members of the Enterprise would steal both firearms and replica firearms in order to obtain the firearms.

The members and associates of the Enterprise would then commit subsequent crimes using the stolen firearms in order to further promote and protect the enterprise.

3. In a typical commercial burglary committed by the Enterprise, members and associates of the Enterprise would break and enter an FFL, sometimes by using a blue crowbar to pry the doors open and other times by using a circular saw to destroy the locking mechanisms of the doors. The Enterprise typically targeted FFLs when the business was closed, such as late at night or in the early morning. If they were unable to get inside, or if a burglar alarm sounded, they would frequently leave before completing the burglary in order to avoid detection by law enforcement.

4. When they were able to successfully break into the business, they would steal dozens of firearms and replica firearms. They would typically carry out boxes containing firearms or replica firearms and place them into their vehicle. Frequently, the Enterprise would have 2-3 members stealing the guns while 1-2 other members served as the lookout or getaway drivers.

5. After a successful operation, the members and associates of the Enterprise would frequently post on social media to brag about their success and show off the firearms they stole. Often, they would use Instagram to make and post videos showing the proceeds of the burglaries in order to generate interest from potential customers who might be interested in purchasing the stolen firearms and in order to promote their organization. They would post these videos to Instagram Live, their Instagram stories, their Instagram feeds, and sometimes YouTube.

6. Once the stolen firearms were secured, the Enterprise would work together to sell or otherwise distribute and transfer the stolen firearms. Often, they would do this by selling the stolen firearms to associates in order to generate revenue for the Enterprise. Other times, they would distribute the stolen firearms amongst fellow members and associates of the Enterprise. Members and associates of the Enterprise worked together to arm themselves in case another rival organization attempted to rob, "slime," or threaten them.

#### BACKGROUND, MANNER, MEANS, AND METHODS OF THE CONSPIRACY

7. The Defendants, and others known and unknown, are associates who conspired with one another to carry out a spree of commercial burglaries and attempted burglaries of FFLs. The Enterprise targeted FFLs in order to obtain control of the personal and business property of the FFL for financial gain, for protection, and for promotion of their organization within their community. The Enterprise also sought to protect the members and operations of the Enterprise from interdiction, detection, and interruption by law enforcement. The manner, means, and methods by which the Defendants and their

associates achieved the objectives of the conspiracy included, but were not limited to, the following:

8. The members and associates filled different roles in the crimes they committed together. The roles included, but were not limited to, the following: breaking into the stores; stealing the firearms; serving as a lookout; remaining in the vehicle as the getaway driver; and engaging in other acts that further the success of the crimes committed by the Enterprise.

9. Members and associates of the Enterprise would make efforts to conceal their identity and avoid identification and apprehension by law enforcement. The members and associates of the enterprise would often wear masks and hoods to hide their appearance.

10. Members and associates of the Enterprise would sell the stolen firearms and replica firearms well above fair market value, frequently selling them to people who were unable to lawfully purchase a firearm and who were, therefore, willing to pay inflated prices. Frequently, they would sell the firearms to juveniles or other prohibited individuals.

11. Members and associates of the Enterprise used social media to communicate with one another and to represent their membership in the Enterprise. To promote and market their Enterprise, members and associates of the Enterprise would post photographs and videos of themselves posing with firearms, U.S. Currency, and expensive clothing.

#### **OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY**

12. In furtherance of the conspiracy and to achieve the objectives thereof—and for the benefit of, at the direction of, and in association with the Enterprise—the Defendants, and others known and unknown, knowingly and willfully directed, participated in, performed, and caused to be performed the following acts, among others, in and throughout Maryland, including in Anne Arundel County, Prince George's County, Baltimore County, and elsewhere:

13. On or about December 21, 2023, at or near the 1100 block of 4th Street, Southeast, Washington, D.C., members and associates of the Enterprise stole a license plate off of Teresa Morgan's vehicle.

14. On or about December 24, 2023, at or near the 7900 block of Central Avenue, Capitol Heights, Prince George's County, Maryland, members and associates of the Enterprise, including Juvenile #1000, Cy'Juan HEMSLEY, and Mahkiya MCQUINN-WOODLEY, broke and entered EJB's Gunshop (an FFL) and stole approximately thirtyfive (35) firearms. To commit this burglary, members and associates of the Enterprise used a crowbar and also used a circular saw to cut an installed lock cylinder. Several of the firearms stolen in this burglary were later recovered. On or about January 17, 2024, one of

the stolen firearms was recovered with several juveniles at 2332 Naylor Road, Southeast, Washington, D.C. On or about February 16, 2024, another one of the firearms was recovered from Southern Maryland Pawn Brokers, after Dorald Hemsley sold the firearm to the store, in Charles County, Maryland. Hemsley is prohibited from possessing firearms. Additionally, on or about February 26, 2024, another of the firearms was recovered from D.B. in Washington D.C., who is a juvenile and is therefore prohibited from possessing firearms.

15. On or about December 24, 2023, Juvenile #1 sent an Instagram Direct Message to Juvenile #2 trying to "show u the joints," referring to the firearms they had stolen at EJB's Gunshop. Juvenile #2 responded that they need to stay off of Instagram because they are "trying to move smart."

16. On or about December 25, 2023, at or near the 7400 block of Baltimore-Annapolis Boulevard, Glen Burnie, Anne Arundel County, Maryland, members and associates of the Enterprise, including Juvenile #1 . . . . , Cy'Juan HEMSLEY, and Juvenile #2 , attempted to break and enter Arundel Firearms and Pawn (an FFL) with the intent to steal firearms. In its attempt to burglarize the premises, members and associates of the Enterprise broke the rear doorknob of the location.

17. On or about December 25, 2023, at or near the 200 block of Thelma Avenue, Glen Burnie, Anne Arundel County, Maryland, members and associates of the Enterprise, including Juvenile #1 , Cy'Juan HEMSLEY, and Juvenile #2 , attempted to break and enter Scott's Gunsmithing (an FFL) with the intent to steal firearms. In its attempt to burglarize the premises, members and associates of the Enterprise attempted to pry the door open.

18. On or about December 25, 2023, at or near the 100 block of Holsum Way, Glen Burnie, Anne Arundel County, Maryland, members and associates of the Enterprise, including Juvenile #1 County, Cy'Juan HEMSLEY, and Juvenile #2 County, cased Cindy's Hotshots (an FFL). In order to determine whether this location would be a suitable target for a burglary, members and associates of the Enterprise the tint off the door to see into the business. Ultimately, members and associates of the Enterprise left the location after causing damage to the door.

19. On or about December 25, 2023, at or near the 8000 block of Jumpers Hole Road, Pasadena, Anne Arundel County, Maryland, members and associates of the Enterprise, including Juvenile #1, Cy'Juan HEMSLEY, and Juvenile #2, pulled into the parking lot of FTS LLC (an FFL), exited their vehicle, and approached the business with the intent to steal firearms. When the FFL owner remotely activated an audible alarm, they re-entered their vehicle and fled the scene.

20. On or about December 25, 2023, at or near the 1300 block of Ashton Road, Hanover, Anne Arundel County, Maryland, members and associates of the Enterprise, including Juvenile #1 , Cy'Juan HEMSLEY, and Juvenile #2 , pulled into the parking lot of Hanover Armory (an FFL), drove around the parking lot, parked between two trailers, idled for a short period of time, and then left the scene.

21. On or about December 25, 2023, at or near the 4300 block of Hollins Ferry Road, Halethorpe, Baltimore County, Maryland, members and associates of the Enterprise, including Juvenile #1 , Cy'Juan HEMSLEY, and Juvenile #2 , attempted to break and enter Tyler Firearms (an FFL store) with the intent to steal firearms. In its attempt to burglarize the premises, members and associates of the Enterprise attempted to break a lock on the door.

22. On or about December 25, 2023, Juvenile #1 attempted to "swap" firearms with another Instagram User. Juv. #1 indicated that he was seeking a gun with bullets, and said that he was able to trade away a Glock 19 Gen 5 firearm or a Glock 17 Gen 5 firearm.

23. On or about December 26, 2023, at or near the 6600 block of Atwood Street, District Heights, Prince George's County, Maryland, members and associates of the Enterprise, including Juvenile #1 County, Cy'Juan HEMSLEY, and Mahkiya MCQUINN-WOODLEY, used handguns to fire into the air in a neighborhood.

24. On or about December 26, 2023, Juvenile #1 attempted to "swap" firearms with another Instagram User. Juv. #1 indicated that he was able to trade away a Glock 19 Gen 5 firearm or a Glock 17 Gen 5 firearm.

25. On or about December 28, 2023, Mahkiya MCQUINN-WOODLEY posted a video to her Instagram story in which she was holding a small handgun with a weapon-mounted optic.

26. On or about December 29, 2023, at or near the 12700 block of Laurel-Bowie Road, Laurel, Prince George's County, Maryland, members and associates of the Enterprise, including Juvenile #1 , Cy'Juan HEMSLEY, Juvenile #2 , and Mahkiya MCQUINN-WOODLEY, broke and entered into the commercial property of Haze Line Guns (an FFL) and stole ten (10) airsoft guns. To commit this burglary, members and associates of the Enterprise used a pry bar which damaged the rear door.

27. On or about December 29, 2023, at or near the 7900 block of Central Avenue, Capitol Heights, Prince George's County, Maryland, members and associates of the Enterprise, including Juvenile #1, Cy'Juan HEMSLEY, Mahkiya MCQUINN-WOODLEY, and Juvenile #2, broke and entered EJB's Gunshop (an FFL) and stole forty-six (46) firearms. To commit this burglary, members and associates of the Enterprise

used a pry bar which left damage to the rear door, and also used a circular saw to cut an installed lock cylinder. On or about January 17, 2024, two of the stolen firearms were recovered with several juveniles at 2332 Naylor Road, Southeast, Washington, D.C.

28. On or about December 29, 2023, Marquice Wilkins was arrested at Gallery Place Metro Station, 625 F Street, Northwest, Washington, D.C., in possession of a firearm that was stolen from EJB's Gunshop just hours previously.

29. On or about December 29, 2023, Juvenile #1 advertised a firearm for sale in an Instagram direct message to the Instagram account @babybuckets00. Juv. #1 said the firearm was not fully automatic, was for sale for \$1,500, and that the buyer had to act fast because they were selling out quickly.

30. On or about December 29, 2023, Juvenile #2 discussed details about the currently armed nature of the Enterprise. Juvenile #2 messaged two Instagram Users, stating, "On bra I got 40 sitting right next to me n drac not trying to hear nun . . . Bru we already on Dey ass . . . That's why ion even know why yu telling me . . . Me n my men looking like the army rn . . . They gon burry Bru in dat coat . . . Bra I'm only saying sum cuz u said dis . . . U dick riding we was jus outside all last night fishing dat joint." When Juv. #2 said that he and his "men" were looking like "the army" right now, he was referencing the amount of firearms that the Enterprise was currently possessing.

31. On or about December 30, 2023, Juvenile #1 sent an Instagram Direct Message to another individual promising an "iron," meaning a firearm, to him within the next two days.

32. On or about December 31, 2023, Juvenile #2 posted a picture on his Instagram feed holding a .40 caliber Glock 22 firearm between his feet with a rifle in the background.

33. On or about December 31, 2023, Cy'Juan HEMSLEY posted three videos to his Instagram feed depicting HEMSLEY possessing multiple firearms. Juvenile #2 and Juvenile #1 also appeared in the videos.

34. On or about January 1, 2024, Cy'Juan HEMSLEY posted a video to his Instagram Feed depicting HEMSLEY possessing a gray Glock firearm.

35. On or about January 1, 2024, Mahkiya MCQUINN-WOODLEY posted a video to her Instagram Story of MCQUINN-WOODLEY holding a small handgun with a weapon-mounted optic attached.

36. On or about January 2, 2024, at or near the 6800 block of District Heights Parkway, District Heights, Prince George's County, Maryland, Juvenile #1

accidentally caused a Glock 17 Gen 5 to discharge while he was manipulating it. When it discharged, the bullet traveled through both feet of Victim A.C. As a result, A.C. suffered two through and through gunshot wounds through the top of her feet and went to University of Maryland Charles Regional Medical Center for treatment. Cy'Juan HEMSLEY and Juvenile #1 went to the hospital to check on her status after the shooting.

37. On or about January 2, 2024, Juvenile #2 posted a photo to his Instagram story holding a Glock Firearm with a drum magazine attached to it.

38. On or about January 2, 2024, Juvenile #2 sent photos via Instagram messenger to an associate of the Enterprise. These photos depicted Cy'Juan HEMSLEY and Juvenile #2 holding multiple firearms in the kitchen of Cy'Juan HEMSLEY's mother's house.

39. On or about January 3, 2024, Juvenile #2 and Juvenile #1 were "slimed" by a former associate of the Enterprise. Juvenile #1 fired a round out of his firearm during the attack in order to protect the members and associates of the Enterprise. Juvenile #2 did not fire a round out of his firearm during the attack, despite being armed. Juvenile #2 was later criticized by members and associates of the Enterprise for not using deadly force when necessary to protect other members and associates of the Enterprise. Juvenile #2 was also criticized for compromising the location of members and associates of the Enterprise, making them vulnerable to "sliming" and other violent attacks.

40. On or about January 6, 2024, Juvenile #2 posted a photo to his Instagram story standing in his kitchen with a rifle leaning up against a refrigerator.

41. On or about January 6, 2024, Juvenile #2 was "slimed" for his Glock 22, his mini Draco, and another unknown firearm. The individuals responsible were a rival group called "Hilltop." On January 11, 2024, Juvenile #1 advised Juvenile #2 to cease arguing with the Hilltop organization until "Juan get home." "Juan" is a nickname that members and associates of the Enterprise use for Cy'Juan HEMSLEY.

42. On or about January 7, 2024, Juvenile #2 posted a photo to his Instagram story of himself posing in a room holding a firearm pointed at the floor.

43. On or about January 9, 2024, Juvenile #2 posted a photo to his Instagram story of two Glock firearms on a table in front of him.

44. On or about January 12, 2024, Mahkiya MCQUINN-WOODLEY was sent a video message through Instagram messenger that depicted MCQUINN-WOODLEY dancing with a small black handgun with a silver magazine. 45. On or about January 14, 2024, Juvenile #2 posted a photograph to his Instagram Story of Juvenile #2, Juvenile #1 and Cy'Juan HEMSLEY posing in a room. In the photograph, Juvenile #2 is holding a Glock-style firearm.

46. On or about January 14, 2024, Mahkiya MCQUINN-WOODLEY posted a video to her Instagram story of MCQUINN-WOODLEY holding a small black handgun with a silver magazine.

47. On or about January 18, 2024, Juvenile #1 posted a photo on his Instagram grid depicting Juv. #2 , Cy'Juan HEMSLEY, and Juvenile #2 holding a firearm in front of a vehicle. This vehicle was a black BMW sedan with the last two digits of the license plate number visible. This was the same vehicle that associates and Members of the Enterprise used during the December 24, 2023, December 25, 2023, and December 29, 2023, burglaries and attempted burglaries.

48. On or about January 19, 2024, Juvenile #1 posted the words "Free vedo free juan free kiya," to his Instagram Story. On January 21, 2024, Juvenile #1 posted the words "Free Juan free spankie free vedo free kiya...my mf team." This story is referring to the fact that Mahkiya MCQUINN-WOODLEY and Cy'Juan HEMSLEY were both incarcerated at this time.

49. On or about March 4, 2024, at or near the 7900 block of Central Avenue, Capitol Heights, Prince George's County, Maryland, members and associates of the Enterprise, including Juvenile #1, attempted to break and enter EJB's Gunshop (an FFL) with the intent to steal firearms.

50. On or about March 3, 2024, at or near the 5900 block of Cherrywood Terrace, Greenbelt, Prince George's County, Maryland, members and associates of the Enterprice including Juvenile #1 , did steal Venel Lifleur's 2014 Hyundai Sonata, the value of which was between \$1,500 and \$25,000.

[CR 9-804(a)] CJIS 1-1395 Felony: 15 years and/or \$1,000,000 fine

#### COUNT TWO

#### (PARTICIPATION IN A CRIMINAL ORGANIZATION – CONSPIRACY)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, at least as early as December 2023, through March 2024, in Anne Arundel County and other jurisdictions within the State of Maryland, and elsewhere, did unlawfully conspire with others, known and unknown to the Jurors, including Juvenile #1 , Mahkiya MCQUINN-WOODLEY, and Juvenile #2, to participate in a criminal organization, knowing that the members of said organization engage in a pattern of organized criminal activity, in violation of the Criminal Law Article, Section 9-804(d) of the Annotated Code 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.

[CR 9-804(d)] CJIS 1-1395 Felony: 15 years, \$1,000,000

#### COUNT THREE

#### (COMMON LAW CONSPIRACY - LAWFUL ACT BY UNLAWFUL MEANS)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, at least as early as December 2023, through January 2024, in Anne Arundel County and other jurisdictions within the State of Maryland, and elsewhere, along with others, known and unknown to the Jurors, including Juvenile #1 Mahkiya MCQUINN-WOODLEY, and Juvenile #2 Jure, unlawfully did conspire to combine to do a lawful act, to wit: enrich and participate in an association, by criminal and unlawful means, including, but not limited to, commercial burglaries and 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] CJIS 1-7399 Misdemeanor: Any sentence that is not cruel or unusual punishment

#### COUNT FOUR

#### (CONSPIRACY TO COMMIT SECOND DEGREE BURGLARY- FIREARM)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, at least as early as December 2023, through January 2024, in Anne Arundel County and other jurisdictions within the State of Maryland, and elsewhere, along with others, known and unknown to the Jurors, including Juvenile #1 , Mahkiya MCQUINN-WOODLEY, and Juvenile #2 , unlawfully did conspire to break and enter storehouses, with the intent to steal, take, and carry away firearms, in violation of the Criminal Law Article, Section 6-202(b) of the Annotated Code of Maryland, 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] 2C3015 Misdemeanor: 20 years and/or \$10,000 fine

#### COUNT FIVE

#### (CONSPIRACY TO COMMIT SECOND DEGREE BURGLARY- GENERAL)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, at least as early as December 2023, through January 2024, in Anne Arundel County and other jurisdictions within the State of Maryland, and elsewhere, along with others, known and unknown to the Jurors, including Juvenile #1 Mahkiya MCQUINN-WOODLEY, and Juvenile #2 , unlawfully did conspire to break and enter storehouses with the intent to commit theft, in violation of the Criminal Law Article, Section 6-203(a) of the Annotated Code of Maryland, 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] CJIS 2C3010 Misdemeanor: 15 years

## <u>COUNT SIX</u> (THEFT SCHEME \$25,000-\$100,000)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, did, between the dates of December 24, 2023, and December 29, 2023, in Prince George's County, Maryland, pursuant to one scheme and continuing course of conduct, unlawfully steal firearms and replica firearms, the property of EJB's Gunshop and Haze Line Guns, having a value of at least \$25,000 but less than \$100,000, in violation of Criminal Law Article, Section 7-104 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 7-104] CJIS 1-1139 Felony: 10 years and/or \$15,000 fine

#### <u>Count Seven</u> (Second Degree Burglary - Firearm)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, at or near the 7900 block of Central Avenue, Capitol Heights, Prince George's County, Maryland, did unlawfully break and enter the storehouse of EJB's Gunshop with the intent to steal, take, and carry away a firearm, in violation of the Criminal Law Article, Section 6-203(b) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-203(b)] CJIS 2-3015 Felony: 20 years and/or \$10,000 fine

## <u>Count Eight</u> (Second Degree Burglary - General)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, at or near the 7900 block of Central Avenue, Capitol Heights, Prince George's County, Maryland, did unlawfully break and enter the storehouse of EJB's Gunshop with the intent to commit theft, in violation of the Criminal Law Article, Section 6-203(a) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-203(b)] CJIS 2-3010 Felony: 15 years

#### <u>COUNT NINE</u> (FOURTH DEGREE BURGLARY - STOREHOUSE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, at or near the 7900 block Central Avenue, Capitol Heights, Prince George's County, Maryland, did unlawfully break and enter the storehouse of EJB's Gunshop, in violation of the Criminal Law Article, Section 6-203(b) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-205(b)] CJIS 1-1130 Misdemeanor: 3 years

#### . <u>Count Ten</u>

## (FOURTH DEGREE BURGLARY - THEFT)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, at or near the 7900 block of Central Avenue, Capitol Heights, Prince George's County, Maryland, was unlawfully in and on the storehouse of EJB's Gunshop with the intent to commit theft, in violation of the Criminal Law Article, Section 6-203(c) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-205(c)] CJIS 2-3040 Misdemeanor: 3 years

# <u>Count Eleven</u> (Fourth Degree Burglary – Burglar's Tools)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess burglar's tools; to wit: a crowbar and circular saw, with the intent to use and allow their use in the commission of a burglary, in violation of the Criminal Law Article, Section 6-205(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-205(d)] CJIS 2-3045 Misdemeanor: 3 years

# <u>COUNT TWELVE</u> (THEFT \$1,500-\$25,000)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully steal firearms, property of EJB's Gunshop, 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 Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 7-104] CJIS 1-1136 Felony: 5 years and/or \$10,000 fine

# COUNT THIRTEEN

# (MALICIOUS DESTRUCTION OF PROPERTY UNDER \$1,000)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did willfully and maliciously destroy a door and locking mechanism, the real property of EJB's Gunshop, in violation of the Criminal Law Article, Section 6-301 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-301] CJIS 3-4025 Misdemeanor: 60 days and/or \$500 fine

## <u>COUNT FOURTEEN</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Century Arms International Centurion BP 12 Gauge Shotgun SN 21US-06238, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT FIFTEEN

#### (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Century Arms International Centurion BP 12 Gauge Shotgun SN 21US-06238, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT SIXTEEN</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Century Arms International Centurion BP 12 Gauge Shotgun SN 21US-05467, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>Count Seventeen</u>

#### (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Century Arms International Centurion BP 12 Gauge Shotgun SN 21US-05467, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

#### <u>COUNT EIGHTEEN</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Century Arms International Centurion BP 12 Gauge Shotgun SN 21US-05857, in violation of the Public Safety Article Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT NINETEEN (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Century Arms International Centurion BP 12 Gauge Shotgun SN 21US-05857, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

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# <u>COUNT TWENTY</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Ruger American Rifle .17 HMR SN 835-57437, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT TWENTY-ONE (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Ruger American Rifle .17 HMR SN 835-57437, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT TWENTY-TWO</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Canik Mete MC 9 MM Pistol SN 25CT27425, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT TWENTY-THREE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Canik Mete MC 9 MM Pistol SN 25CT27425, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT TWENTY-FOUR</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: CZ Shadow 2 Pistol, SN H058172, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT TWENTY-FIVE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: CZ Shadow 2 Pistol, SN H058172, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

## <u>COUNT TWENTY-SIX</u> (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 19 Gen5 MOS Pistol, SN CARB882, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT TWENTY-SEVEN (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 19 Gen5 MOS Pistol, SN CARB882, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT TWENTY-EIGHT (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 19 Gen5 MOS Pistol, SN CARB806, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT TWENTY-NINE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 19 Gen5 MOS Pistol, SN CARB806, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT THIRTY</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 17 Gen5 Pistol SN BVGA126, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT THIRTY-ONE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 17 Gen5 Pistol SN BVGA126, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT THIRTY-TWO</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 19 Gen5 Pistol, SN CAAS601, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

# COUNT THIRTY-THREE (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 19 Gen5 Pistol, SN CAAS601, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT THIRTY-FOUR</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 19 Gen5 Pistol, SN CAAS600, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT THIRTY-FIVE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 19 Gen5 Pistol, SN CAAS600, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT THIRTY-SIX (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock Gen5 Pistol, SN CAAS599, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT THIRTY-SEVEN (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock Gen5 Pistol, SN CAAS599, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT THIRTY-EIGHT</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 19 Gen5 MOS Pistol, SN CBFG137, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

## COUNT THIRTY-NINE (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 19 Gen5 MOS Pistol, SN CBFG137, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# [PS 5-138]

CJIS 1-2801

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

#### COUNT FORTY

#### (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 19 Gen5 MOS Pistol, SN CBFG134, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT FORTY-ONE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 19 Gen5 MOS Pistol, SN CBFG134, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT FORTY-TWO</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 19 Gen5 MOS Pistol, CBFG135, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT FORTY-THREE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 19 Gen5 MOS Pistol, CBFG135, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

#### <u>COUNT ONE HUNDRED AND THIRTY-FIVE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 22 Gen 5 MOS Pistol, SN BWMT227, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT ONE HUNDRED AND THIRTY-SIX (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 22 Gen 3 Pistol, SN BVKX619, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# [PS 5-133(d)]

CJIS 1-5282

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

#### <u>COUNT ONE HUNDRED AND THIRTY-SEVEN</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 22 Gen 3 Pistol, SN BVKX619, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

### <u>COUNT FORTY-FOUR</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: SIG Sauer P320 Spectre Comp Black Pistol, SN 58K197457, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT\_FORTY-FIVE

#### (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: SIG Sauer P320 Spectre Comp Black Pistol, SN 58K197457, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# [PS 5-138]

CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT FORTY-SIX</u> (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: SIG Sauer P320 Spectre Comp Black Pistol, SN 58K177469, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT FORTY-SEVEN</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: SIG Sauer P320 Spectre Comp Black Pistol, SN 58K177469, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT FORTY-EIGHT</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: SIG Sauer P365 XL TACPAC Pistol, SN 66F547245, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# [PS 5-133(d)]

CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT FORTY-NINE

#### (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: SIG Sauer P365 XL TACPAC Pistol, SN 66F547245, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>Count Fifty</u> (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: SIG Sauer P365X ROMEO-X Pistol, SN 66F891202, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT FIFTY-ONE</u>

#### (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: SIG Sauer P365X ROMEO-X Pistol, SN 66F891202, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT FIFTY-TWO</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: SIG Sauer P365 X-MACRO COMP Pistol, SN 66F338273, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT FIFTY-THREE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: SIG Sauer P365- X-MACRO COMP Pistol, SN 66F338273, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT FIFTY-FOUR</u> (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P Bodyguard 380 ACP, SN KJJ0542, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282

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

#### <u>COUNT FIFTY-FIVE</u>

#### (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P Bodyguard 380 ACP, SN KJJ0542, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

## <u>COUNT FIFTY-SIX</u> (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Smith & Wesson 351PD .22 WMR Revolver, SN DRP6900, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT FIFTY-SEVEN

#### (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Smith & Wesson 351PD .22 WMR Revolver, SN DRP6900, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

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## <u>Count Fifty-Eight</u> (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Springfield Armory Ronin 1911 Pistol, SN NM785210, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT FIFTY-NINE

#### (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Springfield Armory Ronin 1911 Pistol, SN NM785210, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

*[PS 5-138]* 

CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT SIXTY (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Mossberg Mav88 Security Shotgun, SN MV0699166, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT SIXTY-ONE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Mossberg Mav88 Security Shotgun, SN MV0699166, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 year and/or \$10,000

# <u>COUNT SIXTY-TWO</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P Shield Pistol, SN RFL7553, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT SIXTY-THREE

#### (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P Shield Pistol, SN RFL7553, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

#### <u>COUNT SIXTY-FOUR</u> (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Ruger PC Carbine Rifle, SN 912-93854, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT SIXTY-FIVE</u> (Possession of a Regulated Firearm: Stolen)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Ruger PC Carbine Rifle, SN 912-93854, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT SIXTY-SIX</u> (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Diamondback DB17 Rifle, SN DB2917570, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT SIXTY-SEVEN</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Diamondback DB17 Rifle, SN DB2917570, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT SIXTY-EIGHT</u> (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Mossberg 88 Shotgun, SN MV0901245, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT SIXTY-NINE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Mossberg 88 Shotgun, SN MV0901245, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

#### <u>COUNT SEVENTY</u> (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Keltec Sub 2000 Rifle, SN FH2R19, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT SEVENTY-ONE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Keltec Sub 2000 Rifle, SN FH2R19, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# [PS 5-138] CJIS 1-2801

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

# <u>COUNT SEVENTY-TWO</u> (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Mossberg Pro 940 Shotgun, SN 94R0037969, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT SEVENTY-THREE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Mossberg Pro 940 Shotgun, SN 94R0037969, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT SEVENTY-FOUR</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Colt Carbine Rifle, SN CR826336, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT SEVENTY-FIVE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Colt Carbine Rifle, SN CR826336, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT SEVENTY-SIX</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Ruger Security Pistol, SN 386-23874, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT SEVENTY-SEVEN</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Ruger Security Pistol, SN 386-23874, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138]

CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT SEVENTY-EIGHT</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Ruger AR 556 Rifle, SN 1852-24784, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT SEVENTY-NINE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Ruger AR 556 Rifle, SN 1852-24784, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P Shield EZ Pistol, RFW3656, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

#### [PS 5-133(d)]

CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT EIGHTY-ONE</u>

# (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P Shield EZ Pistol, RFW3656, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT EIGHTY-TWO</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Tokarev TBP Shotgun, SN 52-H23YB-008987, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

# COUNT EIGHTY-THREE

#### (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Tokarev TBP Shotgun, SN 52-H23YB-008987, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# [PS 5-138]

CJIS 1-2801

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

# COUNT EIGHTY-FOUR (HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 24, 2023, in Prince George's County, Maryland, did unlawfully wear, carry, and transport a handgun on or about their person, in violation of the Criminal Law Article, Section 4-203 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 4-203] CJIS 1-1785 Misdemeanor: 5 years and/or \$2,500

# <u>Count Eighty-Five</u> (Attempt - Second Degree Burglary - Firearm)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 25, 2023, at or near the 7400 block of Baltimore-Annapolis Boulevard, Glen Burnie, Anne Arundel County, Maryland, did unlawfully attempt to break and enter the storehouse of Arundel Firearms and Pawn with the intent to steal, take, and carry away a firearm, in violation of the Criminal Law Article, Section 6-203(b) of the Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

[Common Law] CJIS 2A3015 Misdemeanor: 20 years

# <u>COUNT EIGHTY-SIX</u> (ATTEMPT - SECOND DEGREE BURGLARY - GENERAL)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 25, 2023, at or near the 7400 block of Baltimore-Annapolis Boulevard, Glen Burnie, Anne Arundel County, Maryland, did unlawfully attempt to break and enter the storehouse of Arundel Firearms and Pawn with the intent to commit theft, in violation of the Criminal Law Article, Section 6-203(a) of the Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

[Common Law] CJIS 2A3010 Misdemeanor: 15 years

# COUNT EIGHTY-SEVEN (ATTEMPT - THEFT \$1,500-\$25,000)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 25, 2023, in Anne Arundel County, Maryland, did unlawfully attempt to steal multiple firearms, property of Arundel Firearms and Pawn, 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 Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

[Common Law] CJIS 1A1136 Misdemeanor: 5 years and/or \$10,000 fine

#### **COUNT EIGHTY-EIGHT**

# (MALICIOUS DESTRUCTION OF PROPERTY UNDER \$1,000)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 25, 2023, in Anne Arundel County, Maryland, did willfully and maliciously destroy a door, the real property of Arundel Firearms and Pawn, in violation of the Criminal Law Article, Section 6-301 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-301] CJIS 3-4025 Misdemeanor: 60 days and/or \$500

# <u>Count Eighty-Nine</u> (Attempt – Second Degree Burglary - Firearm)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 25, 2023, at or near the 200 block of Thelma Avenue, Glen Burnie, Anne Arundel County, Maryland, did attempt to break and enter the storehouse of Scott's Gunsmithing with the intent to steal, take, and carry away a firearm, in violation of the Criminal Law Article, Section 6-203(b) of the Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

[Common Law] CJIS 2A3015 Misdemeanor: 20 years

# <u>Count Ninety</u> (Attempt - Second Degree Burglary - General)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 25, 2023, at or near the 200 block of Thelma Avenue, Glen Burnie, Anne Arundel County, Maryland, did unlawfully attempt to break and enter the storehouse of Scott's Gunsmithing with the intent to commit theft, in violation of the Criminal Law Article, Section 6-203(a) of the Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

[Common Law] CJIS 2A3010 Misdemeanor: 15 years

# <u>COUNT NINETY-ONE</u> (ATTEMPT - THEFT \$1,500-\$25,000)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 25, 2023, in Anne Arundel County, Maryland, did unlawfully attempt to steal multiple firearms, property of Scott's Gunsmithing, 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 Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

[Common Law] CJIS 1A1136 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT NINETY-TWO</u> (MALICIOUS DESTRUCTION OF PROPERTY UNDER \$1,000)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 25, 2023, in Anne Arundel County, Maryland, did willfully and maliciously destroy a door, the real property of Scott's Gunsmithing, in violation of the Criminal Law Article, Section 6-301 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-301] CJIS 3-4025 Misdemeanor: 60 days and/or \$500

# <u>COUNT NINETY-THREE</u> (MALICIOUS DESTRUCTION OF PROPERTY UNDER \$1,000)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 25, 2023, in Anne Arundel County, Maryland, did willfully and maliciously destroy a door, the real property of Cindy's Hot Shots, in violation of the Criminal Law Article, Section 6-301 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-301] CJIS 3-4025 Misdemeanor: 60 days and/or \$500

# **COUNT NINETY-FOUR**

#### (ATTEMPT - SECOND DEGREE BURGLARY - FIREARM)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 25, 2023, at or near 4367 Hollins Ferry Road, Halethorpe, Baltimore County, Maryland, did unlawfully attempt to break and enter the storehouse of Tyler Firearms with the intent to steal, take, and carry away a firearm, in violation of the Criminal Law Article, Section 6-203(b) of the Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

[Common Law] CJIS 2A3015 Misdemeanor: 20 years

# COUNT NINETY-FIVE (ATTEMPT - SECOND DEGREE BURGLARY - GENERAL)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 25, 2023, at or near at 4367 Hollins Ferry Road, Halethorpe, Baltimore County, Maryland, did unlawfully attempt to break and enter the storehouse of Tyler Firearms with the intent to commit theft, in violation of the Criminal Law Article, Section 6-203(a) of the Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

[Common Law] CJIS 2A3010 Misdemeanor: 15 years

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# <u>COUNT NINETY-SIX</u> (ATTEMPT - THEFT \$1,500-\$25,000)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 25, 2023, in Baltimore County, Maryland, did attempt to steal firearms, the property of Tyler Firearms, 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 Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

[Common Law] [CR 7-104] CJIS 1A1136 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT NINETY-SEVEN</u> (MALICIOUS DESTRUCTION OF PROPERTY UNDER \$1,000)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 25, 2023, in Baltimore County, Maryland, did willfully and maliciously destroy a door, the real property of Tyler Firearms, in violation of the Criminal Law Article, Section 6-301 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-301] CJIS 3-4025 Misdemeanor: 60 days and/or \$500 fine

# COUNT NINETY-EIGHT (RECKLESS ENDANGERMENT)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 26, 2023, in Prince George's County, Maryland, did unlawfully recklessly engage in conduct that created a substantial risk of death or serious physical injury, in violation of the Criminal Law Article, Section 3-204(a)(1) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 3-204(a)(1)] CJIS 1-1425 Misdemeanor: 5 years and/or \$5,000 fine

# <u>COUNT NINETY-NINE</u> (Possession of Firearm by a Minor)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 26, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# [PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT ONE HUNDRED</u> (HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 26, 2023, in Prince George's County, Maryland, did unlawfully wear, carry, and transport a handgun on or about their person, in violation of the Criminal Law Article, Section 4-203 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 4-203] CJIS 1-1785 Misdemeanor: 5 years and/or \$2,500

# <u>COUNT ONE HUNDRED AND ONE</u> (SECOND DEGREE BURGLARY - GENERAL)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, at or near the 12700 block of Laurel-Bowie Road, Laurel, Prince George's County, Maryland, did unlawfully break and enter the storehouse of Haze Line Guns with the intent to commit theft, in violation of the Criminal Law Article, Section 6-203(a) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-203(b)] CJIS 2-3010 Felony: 15 years

# <u>COUNT ONE HUNDRED AND TWO</u> (FOURTH DEGREE BURGLARY - STOREHOUSE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, at or near the 12700 block of Laurel-Bowie Road, Laurel, Prince George's County, Maryland, did unlawfully break and enter the storehouse of Haze Line Guns, in violation of Criminal Law Article, Section 6-203(b) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-205(b)] CJIS 1-1130 Misdemeanor: 3 years

#### <u>COUNT ONE HUNDRED AND THREE</u> (FOURTH DEGREE BURGLARY - THEFT)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, at or near the 12700 block of Laurel-Bowie Road, Laurel, Prince George's County, Maryland, was unlawfully in and on the storehouse of Haze Line Guns with the intent to commit theft, in violation of Criminal Law Article, Section 6-203(c) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# [CR 6-205(c)] CJIS 2-3040 Misdemeanor: 3 years

#### <u>COUNT ONE HUNDRED AND FOUR</u> (FOURTH DEGREE BURGLARY – BURGLAR'S TOOLS)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess burglar's tools; to wit a crowbar, with the intent to use and allow their use in the commission of a burglary, in violation of the Criminal Law Article, Section 6-205(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-205(d)] CJIS 2-3045 Misdemeanor: 3 years

# <u>COUNT ONE HUNDRED AND FIVE</u> (THEFT \$1,500-\$25,000)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully steal multiple replica firearms, property of Haze Line Guns, 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 Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 7-104] CJIS 1-1136 Misdemeanor: 3 years

#### <u>COUNT ONE HUNDRED AND SIX</u> (MALICIOUS DESTRUCTION OF PROPERTY UNDER \$1,000)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did willfully and maliciously destroy a door, the real property of Haze Line Guns, in violation of the Criminal Law Article, Section 6-301 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-301] CJIS 3-4025 Misdemeanor: 60 days and/or \$500

#### <u>COUNT ONE HUNDRED AND SEVEN</u> (SECOND DEGREE BURGLARY - FIREARM)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, at or near the 7900 block of Central Avenue, Capitol Heights, Prince George's County, Maryland, did unlawfully break and enter the storehouse of EJB's Gunshop with the intent to steal, take, and carry away a firearm, in violation of the Criminal Law Article, Section 6-203(b) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-203(b)] CJIS 2-3015 Felony: 20 years

# <u>COUNT ONE HUNDRED AND EIGHT</u> (SECOND DEGREE BURGLARY - GENERAL)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, at or near the 7900 block of Central Avenue, Capitol Heights, Prince George's County, Maryland, did unlawfully break and enter the storehouse of EJB's Gunshop with the intent to commit theft, in violation of the Criminal Law Article, Section 6-203(a) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-203(b)] CJIS 2-3010 Felony: 15 years

#### <u>COUNT ONE HUNDRED AND NINE</u> (FOURTH DEGREE BURGLARY - STOREHOUSE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, at or near the 7900 block of Central Avenue, Capitol Heights, Prince George's County, Maryland, did unlawfully break and enter the storehouse of EJB's Gunshop, in violation of the Criminal Law Article, Section 6-203(b) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-205(b)] CJIS 1-1130 Misdemeanor: 3 years

# COUNT ONE HUNDRED AND TEN (FOURTH DEGREE BURGLARY - THEFT)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, at or near the 7900 block of Central Avenue, Capitol Heights, Prince George's County, Maryland, was unlawfully in and on the storehouse of EJB's Gunshop with the intent to commit theft, in violation of the Criminal Law Article, Section 6-203(c) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-205(c)] CJIS 2-3040 Misdemeanor: 3 years

# <u>COUNT ONE HUNDRED AND ELEVEN</u> (FOURTH DEGREE BURGLARY – BURGLAR'S TOOLS)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess burglar's tools, to wit: a crowbar, with the intent to use and allow their use in the commission of a burglary, in violation of the Criminal Law Article, Section 6-205(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-205(d)] CJIS 2-3045 Misdemeanor: 3 years

# COUNT ONE HUNDRED AND TWELVE (THEFT \$25,000-\$100,000)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully steal multiple firearms, property of EJB's Gunshop, 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 Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 7-104] CJIS 1-1135 Felony: 10 years and/or \$15,000 fine

# <u>COUNT ONE HUNDRED AND THIRTEEN</u> (MALICIOUS DESTRUCTION OF PROPERTY UNDER \$1,000)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did willfully and maliciously destroy a door, the real property of EJB's Gunshop, in violation of the Criminal Law Article, Section 6-301 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 6-301] CJIS 3-4025 Misdemeanor: 60 days and/or \$500 fine

# <u>COUNT ONE HUNDRED AND FOURTEEN</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: GLFA GL-15 Pistol, SN 1126.64, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT ONE HUNDRED AND FIFTEEN</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: GLFA GL-15 Pistol, SN 1126.64, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# [PS 5-138]

CJIS 1-2801

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

#### COUNT ONE HUNDRED AND SIXTEEN (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: GLFA AR-15 Pistol, SN 1117.72, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT ONE HUNDRED AND SEVENTEEN</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: GLFA AR-15 Pistol, SN 1117.72, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT ONE HUNDRED AND EIGHTEEN</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Diamondback Firearms Carbon DB15 Pistol, SN DB2943363, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

#### [PS 5-133(d)] CJIS 1-5282

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

# <u>COUNT ONE HUNDRED AND NINETEEN</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Diamondback Firearms Carbon DB15 Pistol, SN DB2943363, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT ONE HUNDRED AND TWENTY (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Zastava Arms Zpap M85, SN z85-015173, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT ONE HUNDRED AND TWENTY-ONE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Zastava Arms Zpap M85, SN z85-015173, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT ONE HUNDRED AND TWENTY-TWO</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 43X Pistol, SN CBGR677, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT ONE HUNDRED AND TWENTY-THREE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 43X Pistol, SN CBGR677, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT ONE HUNDRED AND TWENTY-FOUR</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P 9MM 2.0 Shield EZ with laser, SN NMW9090, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT ONE HUNDRED AND TWENTY-FIVE (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P 9MM 2.0 Shield EZ with laser, SN NMW9090, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

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#### <u>COUNT ONE HUNDRED AND TWENTY-SIX</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 27 Gen 5 Pistol, SN BYZP144, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT ONE HUNDRED AND TWENTY-SEVEN</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 27 Gen 5 Pistol, SN BYZP144, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT ONE HUNDRED AND TWENTY-EIGHT</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 22 Gen 5 MOS Pistol, SN BXDJ001, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT ONE HUNDRED AND TWENTY-NINE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 22 Gen 5 MOS Pistol, SN BXDJ001, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT ONE HUNDRED AND THIRTY</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 22 Gen 5 Pistol, SN BVVC0S2, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT ONE HUNDRED AND THIRTY-ONE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 22 Gen 5 Pistol, SN BVVC0S2, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

## COUNT ONE HUNDRED AND THIRTY-TWO (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 22 Gen 5 Pistol, SN BXHL646, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT ONE HUNDRED AND THIRTY-THREE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 22 Gen 5 Pistol, SN BXHL646, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# [PS 5-138]

CJIS 1-2801

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

#### COUNT ONE HUNDRED AND THIRTY-FOUR (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 22 Gen 5 MOS Pistol, SN BWMT227, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

#### <u>COUNT ONE HUNDRED AND THIRTY-EIGHT</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P 10 MM M2.0 PC Pistol, SN NMV8758, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT ONE HUNDRED AND THIRTY-NINE (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P 10 MM M2.0 PC Pistol, SN NMV8758, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138; against the peace, government, and dignity of the State.

# [PS 5-138]

CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT ONE HUNDRED AND FORTY</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P 9 Shield Plus Pistol, SN JML8458, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

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#### <u>COUNT ONE HUNDRED AND FORTY-ONE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P 9 Shield Plus Pistol, SN JML8458, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# [PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT ONE HUNDRED AND FORTY-TWO</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Ruger GP 100 .357 Magnum Revolver, SN 179-55852, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

### <u>COUNT ONE HUNDRED AND FORTY-THREE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Ruger GP 100 .357 Magnum Revolver, SN 179-55852, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT ONE HUNDRED AND FORTY-FOUR</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Sig Sauer P320 Pistol, SN 58J529454, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

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# <u>COUNT ONE HUNDRED AND FORTY-FIVE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Sig Sauer P320 Pistol, SN 58J529454, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT ONE HUNDRED AND FORTY-SIX</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P 9 MM 2.0 Shield EZ with laser, SN RFD4342, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# [PS 5-133(d)]

CJIS 1-5282

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

## <u>COUNT ONE HUNDRED AND FORTY-SEVEN</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P 9 MM 2.0 Shield EZ with laser, SN RFD4342, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# COUNT ONE HUNDRED AND FORTY-EIGHT (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Taurus International G3C 9 MM Pistol, SN 1ka28224, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

#### <u>COUNT ONE HUNDRED AND FORTY-NINE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Taurus International G3C 9 MM Pistol, SN 1ka28224, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT ONE HUNDRED AND FIFTY</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock 17 Gen 5 Pistol, SN BVGA127, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT ONE HUNDRED AND FIFTY-ONE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock 17 Gen 5 Pistol, SN BVGA127, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT ONE HUNDRED AND FIFTY-TWO</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Century Arms International Mini Draco Pistol, SN 22PG-2598, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

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## <u>COUNT ONE HUNDRED AND FIFTY-THREE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Century Arms International Mini Draco Pistol, SN 22PG-2598, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT ONE HUNDRED AND FIFTY-FOUR (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Century Arms Inc. 9S 9mm Pistol, SN RON2245756, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

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# <u>COUNT ONE HUNDRED AND FIFTY-FIVE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Century Arms Inc. 9S 9mm Pistol, SN RON2245756, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT ONE HUNDRED AND FIFTY-SIX</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Diamondback Firearms DB15 Pistol, SN DB2653170, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

#### <u>COUNT ONE HUNDRED AND FIFTY-SEVEN</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Diamondback Firearms DB15 Pistol, SN DB2653170, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# COUNT ONE HUNDRED AND FIFTY-EIGHT (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Springfield Armory Hellcat OSP 9mm Pistol, SN BE232645, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT ONE HUNDRED AND FIFTY-NINE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Springfield Armory Hellcat OSP 9mm Pistol, SN BE232645, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT ONE HUNDRED AND SIXTY</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, possess a regulated firearm, to wit: Springfield Armory Hellcat 9mm Pistol, SN BE249691, unlawfully in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

#### <u>COUNT ONE HUNDRED AND SIXTY-ONE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Springfield Armory Hellcat 9mm Pistol, SN BE249691, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT ONE HUNDRED AND SIXTY-TWO</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Springfield Armory Hellcat Pro OSP 9mm Pistol, SN BE162393, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

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#### <u>COUNT ONE HUNDRED AND SIXTY-THREE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Springfield Armory Hellcat Pro OSP 9mm Pistol, SN BE162393, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### COUNT ONE HUNDRED AND SIXTY-FOUR (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Romarm/Cugir/CAI Micro Draco Pistol, SN 23PMD-44554, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

#### <u>COUNT ONE HUNDRED AND SIXTY-FIVE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Romarm/Cugir/CAI Micro Draco Pistol, SN 23PMD-44554, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

#### <u>COUNT ONE HUNDRED AND SIXTY-SIX</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P 9MM 2.0 Shield EZ with laser, SN NNB1252, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

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# <u>COUNT ONE HUNDRED AND SIXTY-SEVEN</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P 9MM 2.0 Shield EZ with laser, SN NNB1252, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT ONE HUNDRED AND SIXTY-EIGHT</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P 9MM 2.0 Shield EZ with laser, SN NNB8138, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

## <u>COUNT ONE HUNDRED AND SIXTY-NINE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P 9MM 2.0 Shield EZ with laser, SN NNB8138, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

### <u>COUNT ONE HUNDRED AND SEVENTY</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Walther PPQ M2 45 ACP Pistol, SN FDQ7649, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT ONE HUNDRED AND SEVENTY-ONE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Walther PPQ M2 45 ACP Pistol, SN FDQ7649, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

### COUNT ONE HUNDRED AND SEVENTY-TWO (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Smith & Wesson SD9 VE 9 MM Firearm, SN FZK2212, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

## <u>COUNT ONE HUNDRED AND SEVENTY-THREE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Smith & Wesson SD9 VE 9 MM Firearm, SN FZK2212, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# [PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

### <u>COUNT ONE HUNDRED AND SEVENTY-FOUR</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Sig Sauer P365X 9 MM Pistol, SN 66B966811, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

### <u>COUNT ONE HUNDRED AND SEVENTY-FIVE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Sig Sauer P365X 9 MM Pistol, SN 66B966811, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

### <u>COUNT ONE HUNDRED AND SEVENTY-SIX</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Mauser C96 Pistol, SN 451281, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT ONE HUNDRED AND SEVENTY-SEVEN</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Mauser C96 Pistol, SN 451281, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

## <u>COUNT ONE HUNDRED AND SEVENTY-EIGHT</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P 1 Sport II Rifle, SN TT62003, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT ONE HUNDRED AND SEVENTY-NINE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Smith & Wesson M&P 1 Sport II Rifle, SN TT62003, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

## <u>COUNT ONE HUNDRED AND EIGHTY</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Beretta 686 Silver Pigeon I Sporting 12 Gauge Shotgun, SN H27274X, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS.5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

### COUNT ONE HUNDRED AND EIGHTY-ONE (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Beretta 686 Silver Pigeon I Sporting 12 Gauge Shotgun, SN H27274X, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

## COUNT ONE HUNDRED AND EIGHTY-TWO (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Ruger American Predator Rifle, SN 690951554, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

### <u>COUNT ONE HUNDRED AND EIGHTY-THREE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Ruger American Predator Rifle, SN 690951554, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

### COUNT ONE HUNDRED AND EIGHTY-FOUR (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Ruger AR 556 Rifle, SN 859-84595, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT ONE HUNDRED AND EIGHTY-FIVE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Ruger AR 556 Rifle, SN 859-84595, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

### <u>COUNT\_ONE HUNDRED AND EIGHTY-SIX</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Canik Mete SFX 9 MM Pistol, SN 22BY10389, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# [PS 5-133(d)]

CJIS 1-5282) Misdemeanor: 5 years and/or \$10,000 fine

# COUNT ONE HUNDRED AND EIGHTY-SEVEN (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Canik Mete SFX 9 MM Pistol, SN 22BY10389, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# COUNT ONE HUNDRED AND EIGHTY-EIGHT (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Smith & Wesson MP2 9MM Pistol, SN RFW0508, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT ONE HUNDRED AND EIGHTY-NINE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Smith & Wesson MP2 9MM Pistol, SN RFW0508, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# COUNT ONE HUNDRED AND NINETY (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Glock G21G5 Pistol, SN 8ZPV183, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# COUNT ONE HUNDRED AND NINETY-ONE (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Glock G21G5 Pistol, SN 8ZPV183, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# COUNT ONE HUNDRED AND NINETY-TWO (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Smith & Wesson MP20 9 MM Pistol, SN RFD8412, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT ONE HUNDRED AND NINETY-THREE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Smith & Wesson MP20 9 MM Pistol, SN RFD8412, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

### COUNT ONE HUNDRED AND NINETY-FOUR (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Zastava Arms ZPAP92 Pistol, SN ZP2112258, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

# <u>COUNT ONE HUNDRED AND NINETY-FIVE</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Zastava Arms ZPAP92 Pistol, SN ZP2112258, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT ONE HUNDRED AND NINETY-SIX</u> (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Remington 870 12 Gauge Shotgun, SN RA5144795, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-5282 Misdemeanor: 5 years and/or \$10,000 fine

### <u>COUNT ONE HUNDRED AND NINETY-SEVEN</u> (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Remington 870 12 Gauge Shotgun, SN RA5144795, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

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# COUNT ONE HUNDRED AND NINETY-EIGHT (POSSESSION OF FIREARM BY A MINOR)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did, being under 21 years of age, unlawfully possess a regulated firearm, to wit: Diamondback Firearms DB15 Pistol, SN DB2940343, in violation of the Public Safety Article, Section 5-133(d) of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-133(d)] CJIS 1-52845 Misdemeanor: 5 years and/or \$10,000 fine

# COUNT ONE HUNDRED AND NINETY-NINE (POSSESSION OF A REGULATED FIREARM: STOLEN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully possess a regulated firearm, to wit: Diamondback Firearms DB15 Pistol, SN DB2940343, knowing and having reasonable cause to believe the same to have been stolen, in violation of the Public Safety Article, Section 5-138 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[PS 5-138] CJIS 1-2801 Misdemeanor: 5 years and/or \$10,000 fine

# <u>COUNT TWO HUNDRED</u> (HANDGUN ON PERSON)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present, that aforesaid DEFENDANT, on or about December 29, 2023, in Prince George's County, Maryland, did unlawfully wear, carry, and transport a handgun on or about their person, in violation of the Criminal Law Article, Section 4-203 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

[CR 4-203] CJIS 1-1785 Misdemeanor: 5 years and/or \$2,500 fine

Anthony Brown 1 KD ANTHONY G. BROWN

Maryland Attorney General

JACEY SMITH Attorney Number 1812120144 Assistant Attorneys General

JACQUELINE MORITZ Attorney Number 1912180052

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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 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.