



INDEPENDENT INVESTIGATIONS DIVISION

Report Concerning the Police-Involved
Death in Charles County on
December 3, 2024

June 5, 2025

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Declination Report Concerning the Officer-Involved Death of Juvenile on December 3, 2024

The Independent Investigations Division of the Maryland Office of the Attorney General (the “IID”) is charged with investigating “police-involved incidents that result in the death of individuals or injuries likely to result in death.”¹ If the Attorney General determines that the investigation provides sufficient grounds for prosecution, then the IID “shall have exclusive authority to prosecute the offense.”²

I. Introduction

On December 3, 2024, at approximately 3:37 a.m., a deputy with the King George County Sheriff’s Office (“KGSO”) of the State of Virginia began pursuing a Kia sedan. At approximately 3:45 a.m., the pursuit entered Charles County, Maryland. The Charles County Sheriff’s Office (“CCSO”) and La Plata Police Department (“LPPD”) were notified of the pursuit. In response, one CCSO deputy and two LPPD officers moved into stationary positions at different points along U.S. Route 301 (“Robert Crain Highway”) with their emergency lights activated, and tire deflation devices deployed. The subject vehicle struck two of the tire deflation devices and continued driving over 100 miles per hour. Maryland officers did not pursue the subject vehicle. At approximately 4:06 a.m., the pursuit ended when the Kia collided with an uninvolved civilian vehicle. The KGSO, CCSO, and LPPD officers rendered aid to the occupants of both vehicles until emergency medical services (“EMS”) arrived and assumed medical care. The driver of the uninvolved vehicle was transported to a local hospital with non-life-threatening injuries. The subject vehicle’s two occupants were transported to a local hospital with critical injuries. The driver of the subject vehicle, Driver,³ was treated and released. On December 6, 2024, Juvenile, the front seat passenger, died.

After completing its investigation and evaluating all the available evidence, the Office of the Attorney General has determined that the subject officers did not commit a crime under Maryland law. Accordingly, the Attorney General has declined to prosecute any of the subject officers in this case.

The IID’s investigation focused exclusively on potential criminal culpability relating to the subject officers’ conduct. By statute, the IID only has jurisdiction to investigate the actions of Maryland police officers, not those of any other individuals involved in the incident.⁴ Moreover, the IID’s analysis does not consider issues of civil liability or the department’s administrative review of officers’ conduct. Compelled statements by subject officers may be considered in civil or administrative proceedings, but may not be considered in criminal investigations or prosecutions

¹ Md. Code, State Gov’t § 6-602 (c)(1).

² Md. Code, State Gov’t § 6-604 (a) (1).

³ Under Md. Code, Courts and Judicial Proceedings § 3-8A-27(a), a police record concerning a child is confidential information that may not be distributed. Accordingly, the IID will refer to the involved juveniles who were under 18 years old at the time of this incident, as Driver and Juvenile throughout this report.

⁴ Md. Code, Public Safety § 3-201(f) specifically describes what a “police officer” is under the IID’s enabling statute, Md. State Gov’t § 6-602. *See also* Md. Code, State Gov’t § 6-601. “Police officer” is defined in Md. Code, Public Safety § 3-201(f)(1)(ii) 9 to include deputy sheriffs who are members of “the office of the sheriff of a county”. Out-of-state officers do not fall under any of the qualifications listed in Md. Code, Public Safety § 3-201. Therefore, the IID does not have jurisdiction to investigate or prosecute the KGSO deputy involved.

due to the subject officers' Fifth Amendment rights. If any compelled statements exist in this case, they have not been considered in the IID's investigation.

This report is composed of a factual narrative followed by a legal analysis. Every fact in the narrative is supported by the evidence obtained in this investigation, including an autopsy report, crash investigation report, police radio transmissions, dispatch records, police and EMS reports, police body-worn and dashboard camera footage, photographs, department policy, and interviews with civilian and law enforcement witnesses. The subject officers chose not to make a statement in this case, which has no impact on the prosecutorial decision.

The legal analysis explains why the IID will not bring charges under the relevant Maryland statutes.

This investigation involved the driver of the subject vehicle, decedent, and three subject officers:

- A. Driver was under 18 years old at the time of the collision. He is a Black male who lives in Washington, DC.
- B. The decedent, Juvenile, was under 18 years old at the time of the collision. He was a Black male who lived in Washington, DC.
- C. Corporal Katie Bottorf has been employed by CCSO since March 2015. She is a White female, and at the time of the incident, she was 31 years old.
- D. Corporal Tommy Johnston has been employed by LPPD since July 2004. He is a White male and at the time of the incident, he was 54 years old.
- E. Officer Jacob Shuar has been employed by LPPD since September 2022. He is a White male and at the time of the incident, he was 24 years old.

The IID reviewed all available departmental disciplinary records and criminal histories of the involved parties and where they existed, determined none were relevant to this investigation.

II. Factual Summary

On December 3, 2024, at approximately 3:45 a.m., a KGSO deputy, in a marked police cruiser with lights and sirens activated, pursued a Kia sedan into Maryland from Virginia because it was allegedly involved in a robbery.⁵ Two people occupied the Kia: Driver and Juvenile, the front passenger. While traveling at an estimated speed of 120 m.p.h., the subject vehicle and KGSO deputy entered Maryland via the Governor Harry W. Nice Memorial Bridge. The speed limit on the bridge is 50 m.p.h. KGSO officials notified the Charles County 911 Communications Center of the pursuit, who then relayed the information to CCSO and LPPD officers.

⁵ Due to the scope of the IID's investigation, the IID has not examined the potential criminal culpability of Driver or Juvenile and has not examined facts related to the subject vehicle's involvement in any prior incident. The facts involving the subject vehicle were not considered by the IID during this investigation and have no impact on the prosecutorial decision.

Once in Maryland, the subject vehicle and the KGSO cruiser continued driving northbound on Robert Crain Highway at a high rate of speed. Multiple CCSO deputies and LPPD officers drove to Robert Crain Highway to assist the KGSO deputy; however, no Maryland officers pursued the Kia. CCSO Corporal Katie Bottorf, LPPD Corporal Thomas Johnston, and LPPD Officer Jacob Shuar were among the responders. They drove to different locations along Robert Crain Highway and deployed Stop Sticks, a tire deflation device.⁶ Each subject officer had been trained and certified by their department to use Stop Sticks, and all three officers deployed their Stop Sticks using the method detailed in Section III of this report. All three officers radioed their location and deployment of Stop Sticks to dispatchers.

While the subject officers deployed their Stop Sticks, the KGSO cruiser continued pursuing the Kia northbound on Robert Crain Highway. At approximately 3:49 a.m., the KGSO deputy radioed that the Kia was traveling at approximately 120 m.p.h. and had “blackened out”—meaning that the Kia’s headlights and taillights had been turned off. At approximately 3:52 a.m., Corporal Bottorf radioed that the Kia ran over her Stop Sticks. Thirty seconds later, Officer Shuar radioed that the Kia struck his Stop Sticks. The Kia continued traveling over 100 m.p.h. after striking both sets of Stop Sticks. Both Corporal Bottorf and Officer Shuar retrieved the Stop Sticks after the Kia passed by their locations.

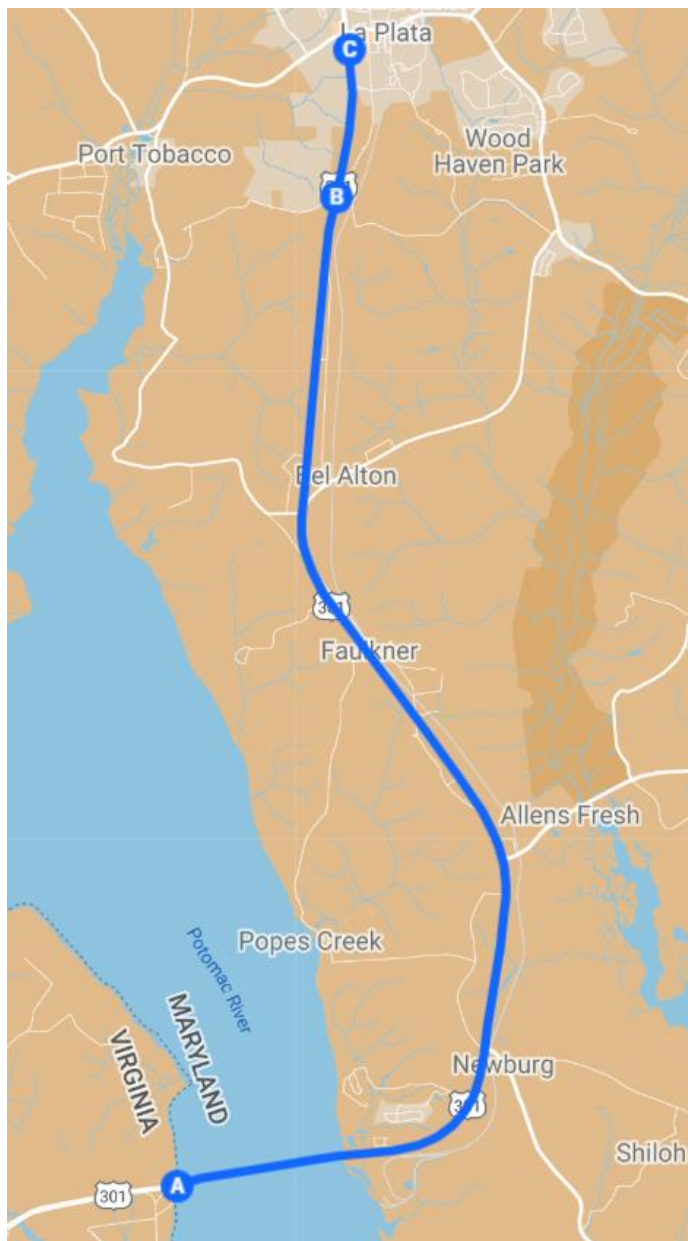


Image 1: A map showing the pursuit route in Maryland. Point A is where the KGSO deputy and the Kia entered Maryland; Point B is where Corporal Bottorf deployed her Stop Sticks, and Point C represents three locations that were within 0.1 miles of each other—the crash site, and where Corporal Johnston and Officer Shuar deployed their Stop Sticks.

⁶ Stop Sticks are triangular shaped hollow plastic housings that contain several spiked steel quills designed to puncture and deflate vehicle tires within twenty to thirty seconds without causing the tires to explode.

As the Kia passed Officer Shuar, an uninvolved Honda SUV at an intersection 0.1 miles away made a left turn into the northbound lanes of Robert Crain Highway. At approximately 3:53 a.m., the Kia—running through a red light with its lights turned off—ran into the back of the Honda at an estimated speed of over 100 m.p.h. The impact pushed both vehicles forward over Corporal Johnston's Stop Sticks. The Kia and the Honda began rotating after the impact, and both came to rest at different places along Robert Crain Highway. The Kia stopped in the median between the northbound and southbound lanes, and the Honda came to rest in a parking lot on the right side of the northbound lanes. Corporal Johnston radioed dispatch to report the crash roughly three seconds after it occurred.



Image 2: An overhead diagram of the crash scene after the collision occurred. The initial impact site is circled in yellow, and the final positions of the Honda and the Kia are circled in green and red, respectively.

After the crash, other officers in the area arrived and immediately moved toward both vehicles to begin rendering aid to the occupants. The KGSO deputy, Corporal Johnston, and CCSO Corporal Nathan Bledsoe arrived at the Kia approximately thirty seconds after the crash and gave the occupants verbal commands to show their hands. At approximately 3:54 a.m., Driver crawled out of the Kia and complied with the officers' verbal commands. Juvenile was severely injured and nonresponsive. At approximately 3:56 a.m., officers physically removed Juvenile from the Kia and provided medical aid. At approximately 4:00 am, La Plata Volunteer Fire Department medics arrived and provided medical treatment to Juvenile. During that same time, Corporal Bottorf arrived on scene and provided aid to the driver of the Honda, who was later transported to a local hospital with non-life-threatening injuries. Driver and Juvenile were both transported to a local hospital with critical injuries. Driver was subsequently treated and released. On December 6, 2024, Juvenile died in the hospital.

III. Supplemental Information

A. Autopsy

The District of Columbia Office of the Chief Medical Examiner performed an autopsy of Juvenile on December 10, 2024. The medical examiner determined that Juvenile died from blunt force injury of the head due to a motor vehicle collision, and that the manner of death was an “accident.”⁷

B. Maryland State Police Crash Investigation Report

The Maryland State Police Crash Team responded to the scene and completed a detailed crash investigation report which found that the Kia entered the state of Maryland via U.S. Route 301 while fleeing the KGSO deputy at speeds in excess of 100 m.p.h. Once in Maryland, the Kia entered the Town of La Plata, struck two Stop Sticks, ran a red light, collided with a Honda SUV, and subsequently struck a third set of Stop Sticks. After the impact, the Kia was redirected into the median where it collided with multiple trees and a metal guardrail, while the Honda was redirected in the opposite direction and collided with a concrete island/curb.

Based on the Honda’s electronic data recorder, it was traveling at 16 m.p.h. when it was struck. Pre-existing rust and corrosion damage rendered the Kia’s electronic data recorder unusable. However, a speed analysis based on dashboard camera footage that captured the crash concluded that the Kia was traveling at over 100 m.p.h. at the time it struck the Honda.

C. Department Policy

Each of the police departments involved has written policies that provide regulations and guidance for their officers.

1. Charles County Sheriff’s Office Policy

Under CCSO Policy 4-302.12, Stop Sticks are a permissible tool to slow or stop a pursued motor vehicle that is refusing to stop. The policy states that Stop Sticks may only be used by officers who have received training on the proper procedure for their deployment, and officers must notify dispatch of the exact location that the Stop Sticks will be deployed before doing so. After a suspect vehicle makes contact with the Stop Sticks, the officer must immediately remove them from the roadway. The policy prohibits the use of stop sticks if an officer lacks the time to announce their use and then safely deploy them.

⁷ Manner of death is a classification used to define whether a death is from intentional causes, unintentional causes, natural causes, or undetermined causes. The District of Columbia Office of Chief Medical Examiner uses five categories of manner of death: natural, accident, suicide, homicide, and undetermined. “Accident” applies when injuries caused the death in question and there is little or no evidence that the injuries occurred with the intent to harm or cause death. These terms are not considered a legal determination, rather they are largely used to assist in the collection of public health statistics. “A Guide for Manner of Death Classification,” First Edition, National Association of Medical Examiners, February 2002.

2. La Plata Police Department Policy

LPPD Policy 702 states that a shift supervisor must determine whether Stop Sticks will be used based on road and traffic conditions during a pursuit, and officers must notify dispatch and all pursuing vehicles of the exact location that the Stop Sticks will be deployed. Officers may only deploy Stop Sticks when they can be reasonably sure of their own safety, and must attempt, when possible, to divert traffic from the Stop Stick deployment area to prevent unnecessary damage to uninvolved vehicles.

3. Department Stop Stick Training

According to interviews with CCSO and LPPD trainers, officers receive Stop Stick training in the police academy and periodic refresher training through their departments. The training teaches the officers: how Stop Sticks are constructed; safety and tactical considerations for deploying Stop Sticks; when to use and when to avoid using Stop Sticks; and the proper method for deploying them.

To deploy the Stop Sticks, officers must stand on one side of the road, throw the nylon bag across to the opposite side of the road, then pull the Stop Sticks into the road as the suspect vehicle arrives. Once the suspect vehicle strikes the Stop Sticks, the officer must pull them off the roadway using the deployment reel's handle.



Image 3: A demonstrative photograph of a deployed set of Stop Sticks.

IV. Legal Analysis

After a criminal investigation, prosecutors must determine whether to bring criminal charges against a person. When making that determination, prosecutors have a legal and ethical duty to only charge a person with a crime when they can meet the State's burden of proof; that is, when the available evidence can prove each element of the alleged crime beyond a reasonable doubt. Prosecutors also need to determine whether the person accused of the crime could raise an affirmative defense. In those cases, prosecutors not only need to prove the crime, but they also need to disprove the defense beyond a reasonable doubt. Ultimately, the decision to bring any charges rests on whether the available evidence is sufficient for prosecutors to meet that standard.

Based on the evidence, the relevant offense that was considered in this case is Involuntary Manslaughter. This offense requires proving that an accused person's grossly negligent conduct causes the death of another person.⁸

⁸ MPJI-Cr 4:17.9.

There is insufficient evidence to prove that the subject officers' conduct was grossly negligent. Accordingly, the IID will not pursue criminal charges against the subject officers. This report explains below in further detail why, based on the evidence, a prosecutor could not prove beyond a reasonable doubt that any Maryland officer committed a crime.⁹

A. Involuntary Manslaughter

Proving involuntary manslaughter requires a prosecutor to establish beyond a reasonable doubt that one or more of the subject officers: 1) acted in a grossly negligent manner and 2) that their gross negligence caused Juvenile's death.¹⁰ Gross negligence is conduct that demonstrates a "wanton and reckless disregard for human life."¹¹ In order to determine whether the subject officers acted with gross negligence, prosecutors must examine the subject officers' actions that could have had an impact on Juvenile's death. In this case, the only relevant actions to analyze are the subject officers' decisions to deploy Stop Sticks against the Kia, and the manner in which the subject officers deployed the Stop Sticks.

The available evidence shows that each of the subject officers' decisions and actions were well within the boundaries of expected and reasonable behavior. The subject officers decided to deploy Stop Sticks because of the need to stop a high-speed chase involving a vehicle whose occupants were suspects in a recent violent crime. There is no evidence to suggest that the subject officers were negligent in any aspect of their use of Stop Sticks during this incident.

Given the totality of circumstances, there is no evidence to indicate that the subject officers' conduct demonstrated a wanton and reckless disregard for human life. Accordingly, the Office of the Attorney General will not charge the subject officers with involuntary manslaughter in this case.

V. Conclusion

This report has presented factual findings, legal analysis, and conclusions relevant to the December 3, 2024, police-involved fatal vehicle crash in Charles County that resulted in the death of Juvenile. The Office of the Attorney General has declined to seek charges in this case because, based on the evidence obtained in its investigation, the subject officers did not commit a crime.

⁹ Because there is insufficient evidence to establish that the subject officers acted with criminal negligence, this report does not analyze whether the subject officers caused the death of Juvenile.

¹⁰ MPJI-Cr 4:17.9.

¹¹ *Duren v. State*, 203 Md. 584, 588 (1954).