
IN THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY

STATE OF MARYLAND

v.

DWAYNE ANTHONY BOOZE

1611 E. Fairmont Avenue

Baltimore, Maryland 21231

D.O.B.: 10/27/1973, SID: 1475521

Tracking Number: 20-7002-00114-6

(TRUE BILL)

GRAND JURY FOREPERSON

FILED: February 18, 2022

CHARGES:

Participation in a Criminal Organization (Maryland Criminal Law Article § 9-804(a))
Participation in a Criminal Organization – Conspiracy (Maryland Criminal Law Article § 9-804(d))
Conspiracy – Lawful Act by Unlawful Means (Common Law)
Conspiracy to Distribute Controlled Dangerous Substances (Common Law)
Conspiracy to Distribute Controlled Dangerous Substances (Common Law)
Conspiracy to Distribute Controlled Dangerous Substances (Common Law)
Drug Kingpin (Maryland Criminal Law Article § 5-613)
Drug Kingpin (Maryland Criminal Law Article § 5-613)
Drug Kingpin (Maryland Criminal Law Article § 5-613)
Drug Kingpin (Maryland Criminal Law Article § 5-613)
Drug Kingpin (Maryland Criminal Law Article § 5-613)
Possession of Large Amounts (Maryland Criminal Law Article § 5-612(a)(2))
Possession of CDS with Intent to Distribute (Maryland Criminal Law Article § 5-602(2))
Possession of CDS (Maryland Criminal Law Article § 5-601(a)(1))
Possession of CDS with Intent to Distribute (Maryland Criminal Law Article § 5-602(2))
Possession of CDS (Maryland Criminal Law Article § 5-601(a)(1))
Distribution of Controlled Dangerous Substance (Maryland Criminal Law Article § 5-602(1))

Possession of CDS with Intent to Distribute (Maryland Criminal Law Article § 5-602(2))
Possession of CDS (Maryland Criminal Law Article § 5-601(a)(1))
Distribution of Controlled Dangerous Substance (Maryland Criminal Law Article § 5-602(1))
Possession of CDS with Intent to Distribute (Maryland Criminal Law Article § 5-602(2))
Possession of CDS (Maryland Criminal Law Article § 5-601(a)(1))
Distribution of Controlled Dangerous Substance (Maryland Criminal Law Article § 5-602(1))
Possession of CDS with Intent to Distribute (Maryland Criminal Law Article § 5-602(2))
Possession of CDS (Maryland Criminal Law Article § 5-601(a)(1))
Firearm/Drug Trafficking (Maryland Criminal Law Article § 5-621(b)(1))
Firearm/Drug Trafficking (Maryland Criminal Law Article § 5-621(b)(1))
Possession of Large Amounts (Maryland Criminal Law Article § 5-612(a)(2))
Possession of Large Amounts (Maryland Criminal Law Article § 5-612(a)(2))
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Possession of Large Amounts (Maryland Criminal Law Article § 5-612(a)(2))
Possession of CDS with Intent to Distribute (Maryland Criminal Law Article § 5-602(2))
Possession of CDS with Intent to Distribute - Fentanyl (Maryland Criminal Law Article § 5-608.1(a))
Possession of CDS with Intent to Distribute (Maryland Criminal Law Article § 5-602(2))
Possession of CDS with Intent to Distribute (Maryland Criminal Law Article § 5-602(2))
Possession of CDS with Intent to Distribute (Maryland Criminal Law Article § 5-602(2))
Possession of CDS with Intent to Distribute (Maryland Criminal Law Article § 5-602(2))
Manufacture CDS (Maryland Criminal Law Article § 5-603)
Possession of CDS (Maryland Criminal Law Article § 5-601(a)(1))
Possession of CDS (Maryland Criminal Law Article § 5-601(a)(1))
Possession of CDS (Maryland Criminal Law Article § 5-601(a)(1))
Possession of CDS (Maryland Criminal Law Article § 5-601(a)(1))
Possession of CDS (Maryland Criminal Law Article § 5-601(a)(1))
Firearm Possession – Crime of Violence/Felony Conviction (Maryland Public Safety Article § 5-133(c))
Illegal Possession Regulated Firearm (Maryland Public Safety Article § 5-133(b))
Firearm Possession – CDS Crime (Maryland Criminal Law Article § 5-622))
Firearm Possession – Crime of Violence/Felony Conviction (Maryland Public Safety Article § 5-133(c))
Illegal Possession Regulated Firearm (Maryland Public Safety Article § 5-133(b))
Firearm Possession – CDS Crime (Maryland Criminal Law Article § 5-622))
Illegal Possession Ammunition (Maryland Public Safety Article § 5-133.1)
Common Nuisance Narcotic (Maryland Criminal Law Article § 5-605(a)(2))
Common Nuisance Narcotic (Maryland Criminal Law Article § 5-605(a)(2))
Common Nuisance Narcotic (Maryland Criminal Law Article § 5-605(a)(2))
Common Nuisance (Maryland Criminal Law Article § 5-605)
Common Nuisance Narcotic (Maryland Criminal Law Article § 5-605(a)(2))

WITNESSES:

Detective Marc Aguiar
Anne Arundel County Police Department

Detective Justin Toomire
Anne Arundel County Police Department

Detective Joseph Solari
Anne Arundel County Police Department

STATE OF MARYLAND

* **IN THE**

v.

* **CIRCUIT COURT**

DWAYNE ANTHONY BOOZE

* **FOR ANNE ARUNDEL COUNTY**

Defendant

* **CASE NO:**

INDICTMENT

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

COUNT ONE
(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, aforesaid DEFENDANT, at least as early as February 2021 through the present day, in Anne Arundel County, Baltimore City, and Baltimore County, of the State of Maryland, along with others known and unknown to the Jurors, did participate in a criminal organization, referred to herein as the “Enterprise,” knowing that the members of said organization engage in 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 a criminal organization, in violation of the Criminal Law Article, Section 9-804(a), of the Maryland Code; against the peace, government, and dignity of the State.

Background

1. Since at least February 2021, the Defendants and others known and unknown, have been members and associates of a criminal enterprise that was operating in Anne Arundel County, and elsewhere (hereinafter “the Enterprise”).

2. The members of the Enterprise consist of, among others, individuals who have a biological relationship to other members, a historical friendship with other members, or a longstanding business relationship with respect to drug sales.

3. The Enterprise consists of individuals who are high-ranking members, who direct, manage, and supervise the lower-ranking members with respect to drug distribution. Dwayne Booze is a high-ranking member who maintains control of the Enterprise’s drug supply. The Enterprise contains individuals who process and manufacture controlled dangerous substances CDS on behalf of the Enterprise.

Manner, Means, and Methods of the Conspiracy

4. The Enterprise seeks, among other things, to maintain control of the drug trade in its territory, to expand its drug trade into new territory, and to protect the members and operations of the Enterprise from interdiction and interruption by law enforcement. The manner, means, and methods by which the Defendants and their associates achieve the objectives of the conspiracy include, but are not limited to, the following:

5. Members and associates of the Enterprise do, individually and collectively, distribute and conspire to distribute, among other things, cocaine, cocaine base, fentanyl, heroin, and marijuana, on behalf of the Enterprise in the territory controlled by the Enterprise.

6. Members and associates of the Enterprise do, individually and collectively, manufacture, process, and prepare controlled dangerous substances (“CDS”) on behalf of the Enterprise.

7. Members and associates of the Enterprise do own and operate seemingly legitimate businesses in an attempt to further and facilitate its drug trade, including using the businesses as a location to store and distribute CDS, disguise the purchase and sale of CDS, and to legitimize the transfer of U.S. currency.

8. Members and associates of the Enterprise do, individually and collectively, wear, carry, and transport, and conspire to wear, carry, and transport firearms. Members and associates of the Enterprise do, individually and collectively, possess and use firearms during, and in relation to, the trafficking of CDS.

9. Members and associates of the Enterprise use counter-surveillance techniques and work together, collectively, to avoid detection by law enforcement.

10. Members and associates of the Enterprise use cellular telephones and social media accounts to communicate with one another concerning and during the commission of the Enterprise’s illegal activities, including to plan meetings to exchange money or CDS, check on the status of the CDS distribution locations, communicate with customers and suppliers of CDS, and warn each other about law enforcement presence.

11. Members and associates of the Enterprise use multiple cellular telephones, numbers, and devices during the commission of the Enterprise’s illegal activities in an attempt to avoid detection and apprehension by law enforcement. Members and associates of the Enterprise, at the direction of higher-ranking members, replace their cellular devices and telephone numbers in an attempt to avoid detection and apprehension by law enforcement.

12. Members and associates of the Enterprise often communicate through coded language and short text messages in an attempt to conceal the illegal acts done in furtherance of the Enterprise, and to avoid detection and apprehension by law enforcement.

13. Members and associates of the Enterprise utilize their businesses and the homes of members, associates, and family members, to stash, store, process, and safeguard illegal CDS, weapons, and proceeds, and as a place to retreat to in the event of law enforcement activity in the area.

14. Members and associates of the Enterprise utilize vehicles to distribute CDS to customers at their businesses, homes, at the homes of family members, at the stash location, or at other businesses including restaurants and retail establishments throughout Anne Arundel County, Baltimore County, Howard County, and Baltimore City. Often, CDS transactions are conducted in the open, or within and between their vehicles or the vehicles of their customers.

15. Members and associates of the Enterprise will use third-parties or other members and associates of the Enterprise to transport and distribute CDS on their behalf in order to avoid detection by law enforcement.

16. Members and associates of the Enterprise utilize interstate parcel carriers to facilitate the purchase and distribution of CDS on behalf of the Enterprise.

Overt Acts in Furtherance of the Conspiracy

17. From at least February 2021 through the present day, members and associates of the Enterprise utilized social media, including Facebook, and cellular phones to communicate about controlled dangerous substances, money, meeting locations, and to otherwise facilitate the distribution of controlled dangerous substances. Often those conversations were coded to avoid law enforcement and conceal the illicit nature of the conversations.

18. On March 18, 2021, Dwayne Booze, Maurice Dotson, and an unknown individual exchanged CDS and/or U.S. Currency at Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland.

19. On March 31, 2021, Dwayne Booze and Maurice Dotson exchanged CDS and/or U.S. currency at Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland.

20. On June 17, 2021, Dwayne Booze, Michael Booze, and Maurice Dotson exchanged CDS and/or U.S. currency at Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland.

21. On June 23, 2021, plastic bags and other drug wrappers containing cocaine residue were recovered from the trash at 1214 W. Cross Street in Baltimore City, Maryland.

22. On June 24, 2021, Dwayne Booze and an unknown individual exchanged CDS and/or U.S. currency at Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland.

23. On July 7, 2021, Michael Booze transported CDS and/or U.S. currency from 1214 W. Cross Street in Baltimore City, Maryland to Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland. Dwayne Booze and Thomas William Booze were also present at the location on that date.

24. On July 16, 2021, Dwayne Booze and Rapheela Finnegan transported CDS and/or U.S. currency between 1611 E. Fairmont Avenue, 1214 W. Cross Street, and 1240 W. Pratt Street, all located in Baltimore City, Maryland. During this time, Michael Booze was present at 1214 W. Cross Street, Baltimore City, Maryland.

25. On July 20, 2021, Dwayne Booze transported CDS and/or U.S. currency from 1214 W. Cross Street, Baltimore City, Maryland, to Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland. Michael Booze was present at 1214 W. Cross Street. Thomas Timothy Booze was present at 1240 W. Pratt Street.

26. On July 31, 2021, Dwayne Booze and an unknown individual exchanged CDS and/or U.S. currency at 1214 W. Cross Street, Baltimore City, Maryland.

27. On August 4, 2021, Michael Booze transported CDS and/or U.S. currency from 1214 W. Cross Street to at Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland. Dwayne Booze and Michael Booze exchanged CDS and/or U.S. currency at or near 1240 W. Pratt Street, Baltimore City, Maryland.

28. On August 26, 2021, Thomas Timothy Booze transported CDS and/or U.S. currency between 1214 W. Cross Street and Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland. Thomas Timothy Booze and Michael Booze exchanged CDS and/or U.S. currency at 1214 W. Cross Street, Baltimore City, Maryland.

29. On September 16, 2021, Michael Booze distributed CDS to Thomas Timothy Booze at or near 1214 W. Cross Street, Baltimore City, Maryland.

30. On September 17, 2021, Dwayne Booze directed Michael Booze to exchange CDS and/or U.S. currency with another member of the Enterprise at or near 1214 W. Cross Street, Baltimore City, Maryland.

31. On September 18, 2021, Michael Booze distributed CDS to Dwayne Booze at or near 1214 W. Cross Street, Baltimore City, Maryland.

32. On September 19, 2021, at the direction of Dwayne Booze, Michael Booze distributed CDS to Dominic Mooney at or near Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland.

33. On September 20, 2021, Michael Booze distributed CDS to Dwayne Booze at or near 1214 W. Cross Street, Baltimore City, Maryland.

34. On September 20, 2021, at the direction of Dwayne Booze, Michael Booze distributed CDS to Thomas Timothy Booze at or near 1214 W. Cross Street, Baltimore City, Maryland. Thomas Timothy Booze transported the CDS to Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland.

35. On September 20, 2021, Dwayne Booze and Rapheela Finnegan distributed CDS to Leon Holman at or near 3819 North Point Blvd., Dundalk, Baltimore County, Maryland.

36. On September 21, 2021, Dwayne Booze distributed CDS to Dominic Mooney at or near Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland.

37. On September 21, 2021, Thomas William Booze provided U.S. currency to the Enterprise, at the direction of Dwayne Booze, for the purposes of funding CDS purchases for resale by the Enterprise at or near Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland.

38. On September 23, 2021, Michael Booze, at the direction of Dwayne Booze, distributed CDS to Thomas Timothy Booze at or near 1214 W. Cross Street, Baltimore City, Maryland.

39. On September 23, 2021, Michael Booze distributed CDS to Dwayne Booze at or near Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland.

40. On September 23, 2021, Dwayne Booze distributed CDS to James Nichols at or near the intersection of Eastern Avenue and South Broadway in Baltimore City, Maryland.

41. On September 25, 2021, Dwayne Booze distributed CDS to Leon Holman at or near Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland.

42. On September 26, 2021, Dwayne Booze distributed CDS to James Nichols at or near 2216 Orleans Road, Baltimore City, Maryland.

43. On September 26, 2021, Dwayne Booze distributed CDS to Steven Young at or near 2216 Orleans Road, Baltimore City, Maryland

44. On September 27, 2021, Dwayne Booze organized the purchase of CDS from Dominique McKoy. Thomas Timothy Booze was present and received the CDS from Dominique McKoy at Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland.

45. On October 12, 2021, Michael Booze distributed CDS to Ashley Raley at or near 1214 W. Cross Street, Baltimore City, Maryland.

46. On October 18, 2021, Michael Booze distributed CDS to Leon Holman at or near the intersection of W. Cross Street and Sterrett Street in Baltimore City, Maryland.

47. On October 23, 2021, Michael Booze distributed CDS to an unknown black male at or near 7802 Southhampton Drive, Glen Burnie, Anne Arundel County, Maryland.

48. On October 25, 2021, Michael Booze transported CDS from 1214 W. Cross Street to Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland. Michael Booze then distributed CDS to Dominic Mooney at or near Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland.

49. On November 6, 2021, Michael Booze distributed CDS to Leon Holman at or near 798 Cross Street, Baltimore City, Maryland.

50. On November 6, 2021, Michael Booze distributed CDS to Dwayne Purnell at or near 6420 Union Court, Glen Burnie, Anne Arundel, Maryland.

51. On November 6, 2021, Thomas William Booze distributed CDS to an unknown male at 7126 East Furnace Branch Road, Glen Burnie, Anne Arundel County, Maryland.

52. On November 7, 2021, Michael Booze distributed CDS to Ashley Raley at or near 162 W. Meadow Lane, Baltimore, Anne Arundel County, Maryland.

53. On November 7, 2021, Thomas William Booze distributed CDS to Reginald Evans at or near 7162 E. Furnace Branch Road, Glen Burnie Anne Arundel County, Maryland.

54. On November 8, 2021, Thomas William Booze distributed CDS to Mark Harding at or near 7126 East Furnace Branch Road, Glen Burnie, Anne Arundel County, Maryland.

55. On November 9, 2021, Michael Booze distributed CDS to Ashley Raley at or near 162 W. Meadow Lane, Baltimore, Anne Arundel County, Maryland.

56. On November 9, 2021, Michael Booze distributed CDS to Leon Holman at or near 6420 Union Court, Glen Burnie, Anne Arundel, Maryland.

57. On November 11, 2021, Thomas William Booze distributed CDS to an unknown male at 7126 East Furnace Branch Road, Glen Burnie, Anne Arundel County, Maryland.

58. On November 12, 2021, Michael Booze distributed CDS to Ashley Raley at or near 6420 Union Court, Glen Burnie, Anne Arundel County, Maryland.

59. On November 12, 2021, Thomas William Booze distributed CDS to Dynell Becket at or near 8428 Elvaton Road, Millersville, Anne Arundel County, Maryland.

60. On November 12, 2021, Thomas William Booze distributed CDS to William Redman at or near 8056 Jumpers Hole Road, Pasadena, Anne Arundel County, Maryland.

61. On November 13, 2021, Thomas William Booze distributed CDS to Robert Britton at or near 7126 East Furnace Branch Road, Glen Burnie, Anne Arundel County, Maryland.

62. On November 13, 2021, Michael Booze distributed CDS to Adrian Williams at or near 6420 Union Court, Glen Burnie, Anne Arundel County, Maryland.

63. On November 13, 2021, Michael Booze distributed CDS to Leon Holman at or near 6420 Union Court, Glen Burnie, Anne Arundel County, Maryland.

64. On November 14, 2021, Michael Booze distributed CDS to Kevin Thompson at or near the intersection of Cross Street and Hamburg Street, Baltimore City, Maryland.

65. On November 14, 2021, Michael Booze distributed CDS to an unknown black male at or near 6616 Ritchie Highway, Glen Burnie, Anne Arundel County, Maryland.

66. On November 15, 2021, Thomas William Booze distributed CDS to Thomas Sears at or near 7624 Furnace Branch Road, Glen Burnie, Anne Arundel County, Maryland.

67. On November 15, 2021, Michael Booze distributed CDS to Leon Holman at or near the intersection of W. Cross Street and Scott Street in Baltimore City, Maryland.

68. On November 15, 2021, Michael Booze distributed CDS to Maurice Dotson at or near 1214 W. Cross Street, Baltimore City, Maryland. Maurice Dotson, then, transported CDS and/or U.S. currency between 1214 W. Cross Street, Baltimore City, Maryland and 7905 Canter Court, Severn, Anne Arundel County, Maryland.

69. On November 16, 2021, Michael Booze transported CDS from 1214 W. Cross Street, Baltimore City, Maryland to 7264 Furnace Branch Road, Glen Burnie, Anne Arundel County, Maryland. Michael Booze distributed CDS to Thomas William Booze at 7624 Furnace Branch Road, Glen Burnie, Anne Arundel County, Maryland.

70. On or about November 18, 2021, Dwayne Booze coordinated the importation of CDS from out of state to 1214 W. Cross Street, Baltimore City, Maryland. Dwayne Booze communicated with Michael Booze, Thomas Timothy Booze, Maurice Dotson, and other unknown individuals to facilitate the importation of the CDS. An unknown male transported the CDS between 1214 W. Cross Street, Baltimore City, Maryland and Xclusive Services, located at 1240 W. Pratt Street, Baltimore City, Maryland.

71. On November 20, 2021, Michael Booze distributed CDS to Ashley Raley at or near 162 W. Meadow Lane, Baltimore, Anne Arundel County, Maryland.

72. On November 21, 2021, Thomas William Booze distributed CDS to Timothy Bryant at or near 66 Mountain Road, Glen Burnie, Anne Arundel County, Maryland.

73. On November 22, 2021, Michael Booze distributed CDS to Ashley Raley at or near 162 W. Meadow Lane, Baltimore, Anne Arundel County, Maryland.

74. On November 30, 2021, Michael Booze distributed CDS to Ashley Raley at or near 162 W. Meadow Lane, Baltimore, Anne Arundel County, Maryland.

75. On December 3, 2021, Michael Booze distributed CDS to Ashley Raley at or near 162 W. Meadow Lane, Baltimore, Anne Arundel County, Maryland.

76. On December 6, 2021, Michael Booze distributed CDS to Ashley Raley at or near 162 W. Meadow Lane, Baltimore, Anne Arundel County, Maryland.

77. On or about December 7, 2021, a search and seizure warrant was executed at Xclusive Services, located at 1240 W. Pratt Street, Baltimore, Maryland, a location controlled by the Enterprise. The Enterprise was found to be in possession of cocaine, cocaine base, heroin, fentanyl, and marijuana, as well as materials and substances used in the manufacturing, processing, packaging, storage, and distribution of CDS. Additionally, the Enterprise was found to be in possession of a Smith & Wesson 9 mm handgun, a revolver, and ammunition.

78. On or about December 7, 2021, a search and seizure warrant was executed at 1214 W. Cross Street, Baltimore, Maryland, a location controlled by the Enterprise and used as a stash location. The Enterprise was found to be in possession of numerous materials and substances used in the manufacturing, packaging, and distribution of CDS.

79. On or about December 7, 2021, a search and seizure warrant was executed at 6420 Union Court, Glen Burnie, Anne Arundel County, Maryland, a location utilized by Michael Booze as a residence. Michael Booze was found to be in possession of a digital scale, a Taurus handgun, and U.S. currency. An additional search and seizure warrant was executed at 162 W. Meadow Road, Brooklyn, Anne Arundel County, Maryland, another location used by Michael Booze as a residence. Additional U.S. currency was located, as well as marijuana and a handgun.

80. On or about December 7, 2021, a search and seizure warrant was executed at 1611 E. Fairmont Street, Baltimore City, Maryland, the residence of Dwayne Booze and Rapheela Finnegan. Dwayne Booze was found to be in possession of U.S. currency.

81. On or about December 7, 2021, a search and seizure warrant was executed at 3615 Spaulding Avenue, Baltimore, Maryland, the residence of Thomas Timothy Booze. Thomas Timothy Booze was found to be in possession of marijuana, ammunition, U.S. currency, and a digital scale.

82. On or about December 7, 2021, a search and seizure warrant was executed at 7905 Canter Court, Severn, Anne Arundel County, Maryland, the residence of Maurice Dotson. Maurice Dotson was found to be in possession of heroin, fentanyl, tramadol, U.S. currency, CDS packaging, and a money counter.

83. On or about December 7, 2021, a search and seizure warrant was executed at 5 Marley Neck Road, Glen Burnie, Anne Arundel County, Maryland, a location used by Thomas William Booze as a residence. Thomas William Booze was found to be in possession of U.S. currency and ammunition.

84. On or about December 7, 2021, a search and seizure warrant was executed at 7838 Foxfarm Lane, Glen Burnie, Anne Arundel County, Maryland, a location used by Thomas William Booze as a residence. Thomas William Booze was found to be in possession of a Winchester shotgun and ammunition.

85. On or about December 7, 2021, a search and seizure warrant was executed at 7264 E. Furnace Branch Road, Glen Burnie, Anne Arundel County, Maryland, a location controlled by the Enterprise. The Enterprise was found to be in possession of cocaine.

86. On or about December 7, 2021, a search and seizure warrant was executed at 720 Columbus Drive, Glen Burnie, Anne Arundel County, Maryland, the residence of Maurice Davis. Maurice Davis was found to be in possession of marijuana, CDS packaging materials, and two handguns.

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 February 2021 through the present day, in Anne Arundel County, Baltimore City, and Baltimore County, of the State of Maryland, did conspire with others known and unknown to the Jurors, to participate in a criminal organization, knowing that the members of said organization engage in a pattern of organized criminal activity, in violation of the Criminal Law Article, Section 9-804(d), of the Maryland Code; against the peace, government, and dignity of the State.

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

[CR 9-804(d)] CJIS 1-1395

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 February 2021 through the present day, in Anne Arundel County, Baltimore City, and Baltimore County, of the State of Maryland, along with others known and unknown to the Jurors, 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 illegal trafficking of controlled dangerous substances (“CDS”) 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]

COUNT FOUR
(CONSPIRACY TO DISTRIBUTE CONTROLLED DANGEROUS SUBSTANCES)

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 February 2021 through the present day, in Anne Arundel County, Baltimore City, and Baltimore County, of the State of Maryland, along with others known and unknown to the Jurors, unlawfully did conspire with certain other persons whose names are known and unknown to the Jurors, to distribute controlled dangerous substances of schedule II, to wit: Cocaine, in violation of the Common Law against the peace, government and dignity of the State.

[Common Law; CR 5-602] CJIS 1-C-1118

COUNT FIVE
(CONSPIRACY TO DISTRIBUTE CONTROLLED DANGEROUS SUBSTANCES)

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 February 2021 through the present day, in Anne Arundel County, Baltimore City, and Baltimore County, of the State of Maryland, along with others known and unknown to the Jurors, unlawfully did conspire with certain other persons whose names are known and unknown to the Jurors, to distribute controlled dangerous substances of schedule I, to wit: Fentanyl, in violation of the Common Law against the peace, government and dignity of the State.

[Common Law; CR 5-602] CJIS 1-C-1118

COUNT SIX
(CONSPIRACY TO DISTRIBUTE CONTROLLED DANGEROUS SUBSTANCES)

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 February 2021 through the present day, in Anne Arundel County, Baltimore City, and Baltimore County, of the State of Maryland, along with others known and unknown to the Jurors, unlawfully did conspire with certain other persons whose names are known and unknown to the Jurors, to distribute controlled dangerous substances of schedule II, to wit: Heroin, in violation of the Common Law against the peace, government and dignity of the State.

[Common Law; CR 5-602] CJIS 1-C-1118

COUNT SEVEN
(DRUG KINGPIN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, from on or about September 15, 2021 through the present day, in Anne Arundel County, Baltimore City, and Baltimore County, State of Maryland, did as an organizer, supervisor, financier, and manager, in a conspiracy with certain other persons whose names are known and unknown to the Jurors, manufacture, distribute, bring into the State, and transport into the State, a controlled dangerous substance of Schedule II, to wit: Cocaine, in an amount greater than 448 grams, in violation of Criminal Law Article, Section 5-613 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-613] CJIS Code 1-0488
Felony 40 years, \$1,000,000

COUNT EIGHT
(DRUG KINGPIN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, from on or about September 15, 2021 through the present day, in Anne Arundel County, Baltimore City, and Baltimore County, State of Maryland, did as an organizer, supervisor, financier, and manager, in a conspiracy with certain other persons whose names are known and unknown to the Jurors, manufacture, distribute, bring into the State, and transport into the State, a controlled dangerous substance of Schedule II, to wit: Fentanyl, in an amount greater than 5 grams, in violation of Criminal Law Article, Section 5-613 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-613] CJIS Code 1-0488
Felony 40 years, \$1,000,000

COUNT NINE
(DRUG KINGPIN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, from on or about September 15, 2021 through the present day, in Anne Arundel County, Baltimore City, and Baltimore County, State of Maryland, did as an organizer, supervisor, financier, and manager, in a conspiracy with certain other persons whose names are known and unknown to the Jurors, manufacture, distribute, bring into the State, and transport into the State, a controlled dangerous substance of Schedule I, to wit: Heroin, in an amount greater than 28 grams, in violation of Criminal Law Article, Section 5-613 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-613] CJIS Code 1-0488
Felony 40 years, \$1,000,000

COUNT TEN
(DRUG KINGPIN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, from on or about September 15, 2021 through the present day, in Anne Arundel County, Baltimore City, and Baltimore County, State of Maryland, did as an organizer, supervisor, financier, and manager, in a conspiracy with certain other persons whose names are known and unknown to the Jurors, manufacture, distribute, bring into the State, and transport into the State, a controlled substance of Schedule II, to wit: a mixture containing Fentanyl, in an amount greater than 28 grams, in violation of Criminal Law Article, Section 5-613 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-613] CJIS Code 1-0488
Felony 40 years, \$1,000,000

COUNT ELEVEN
(DRUG KINGPIN)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, from on or about September 15, 2021 through the present day, in Anne Arundel County, Baltimore City, and Baltimore County, State of Maryland, did as an organizer, supervisor, financier, and manager, in a conspiracy with certain other persons whose names are known and unknown to the Jurors, manufacture, distribute, bring into the State, and transport into the State, a controlled substance of Schedule I, to wit: a mixture containing Heroin, in an amount greater than 28 grams, in violation of Criminal Law Article, Section 5-613 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-613] CJIS Code 1-0488
Felony 40 years, \$1,000,000

COUNT TWELVE
(POSSESSION OF LARGE AMOUNT OF CONTROLLED DANGEROUS SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, from on or about September 15, 2021 through November 30, 2021, in Anne Arundel County, Baltimore City, and Baltimore County, State of Maryland, did unlawfully possess a controlled dangerous substance of Schedule II, to wit: Cocaine, in an amount greater than 448 grams, in violation of Criminal Law Article, Section 5-612 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-612] CJIS Code 1-0881
Felony 5 year Mandatory Minimum, \$100,000

COUNT THIRTEEN
(POSSESSION WITH INTENT TO DISTRIBUTE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about September 18, 2021, at or near 1214 W. Cross Street, in Baltimore City, State of Maryland, did possess a controlled dangerous substance of Schedule II, to wit: Cocaine, in sufficient quantity reasonably to indicate under all circumstances an intent to distribute and dispense a controlled dangerous substance, in violation of Criminal Law Article, Section 5-602(2) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-602] CJIS Code 1-1119
Felony 20 years, \$15,000

COUNT FOURTEEN
(POSSESSION OF CONTROLLED SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about September 18, 2021, at or near 1214 W. Cross Street, in Baltimore City, State of Maryland, did possess a controlled substance of Schedule II, to wit: Cocaine, in violation of Criminal Law Article, Section 5-601(a)(1) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-601(a)(1)] CJIS Code 1-1111
Misdemeanor 1 year, \$5,000

COUNT FIFTEEN
(POSSESSION WITH INTENT TO DISTRIBUTE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about September 20, 2021, at or near 3819 North Point Blvd., in Baltimore County, State of Maryland, did possess a controlled dangerous substance of Schedule II, to wit: Cocaine, in sufficient quantity reasonably to indicate under all circumstances an intent to distribute and dispense a controlled dangerous substance, in violation of Criminal Law Article, Section 5-602(2) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-602] CJIS Code 1-1119
Felony 20 years, \$15,000

COUNT SIXTEEN
(POSSESSION OF CONTROLLED SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about September 20, 2021, at or near 3819 North Point Blvd., in Baltimore County, State of Maryland, did possess a controlled substance of Schedule II, to wit: Cocaine, in violation of Criminal Law Article, Section 5-601(a)(1) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-601(a)(1)] CJIS Code 1-1111
Misdemeanor 1 year, \$5,000

COUNT SEVENTEEN
(DISTRIBUTION)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about September 20, 2021, at or near 3819 North Point Blvd., in Baltimore County, State of Maryland, did unlawfully distribute to Leon Holman, a controlled dangerous substance of Schedule II, to wit: Cocaine, in violation of Criminal Law Article, Section 5-602 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-602] CJIS Code 1-1118
Felony 20 years, \$15,000

COUNT EIGHTEEN
(POSSESSION WITH INTENT TO DISTRIBUTE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about September 25, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a controlled dangerous substance of Schedule II, to wit: Cocaine, in sufficient quantity reasonably to indicate under all circumstances an intent to distribute and dispense a controlled dangerous substance, in violation of Criminal Law Article, Section 5-602(2) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-602] CJIS Code 1-1119
Felony 20 years, \$15,000

COUNT NINETEEN
(POSSESSION OF CONTROLLED SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about September 25, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a controlled substance of Schedule II, to wit: Cocaine, in violation of Criminal Law Article, Section 5-601(a)(1) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-601(a)(1)] CJIS Code 1-1111
Misdemeanor 1 year, \$5,000

COUNT TWENTY
(DISTRIBUTION)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about September 25, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did unlawfully distribute to Leon Holman, a controlled dangerous substance of Schedule II, to wit: Cocaine, in violation of Criminal Law Article, Section 5-602 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-602] CJIS Code 1-1118
Felony 20 years, \$15,000

COUNT TWENTY-ONE
(POSSESSION WITH INTENT TO DISTRIBUTE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about September 26, 2021, in Baltimore City, State of Maryland, did possess a controlled dangerous substance of Schedule II, to wit: Cocaine, in sufficient quantity reasonably to indicate under all circumstances an intent to distribute and dispense a controlled dangerous substance, in violation of Criminal Law Article, Section 5-602(2) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-602] CJIS Code 1-1119
Felony 20 years, \$15,000

COUNT TWENTY-TWO
(POSSESSION OF CONTROLLED SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about September 26, 2021, in Baltimore City, State of Maryland, did possess a controlled substance of Schedule II, to wit: Cocaine, in violation of Criminal Law Article, Section 5-601(a)(1) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-601(a)(1)] CJIS Code 1-1111
Misdemeanor 1 year, \$5,000

COUNT TWENTY-THREE
(DISTRIBUTION)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about September 26, 2021, in Baltimore City, State of Maryland, did unlawfully distribute to Steven Young, a controlled dangerous substance of Schedule II, to wit: Cocaine, in violation of Criminal Law Article, Section 5-602 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-602] CJIS Code 1-1118
Felony 20 years, \$15,000

COUNT TWENTY-FOUR
(POSSESSION WITH INTENT TO DISTRIBUTE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about September 27, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a controlled dangerous substance of Schedule II, to wit: Cocaine, in sufficient quantity reasonably to indicate under all circumstances an intent to distribute and dispense a controlled dangerous substance, in violation of Criminal Law Article, Section 5-602(2) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-602] CJIS Code 1-1119
Felony 20 years, \$15,000

COUNT TWENTY-FIVE
(POSSESSION OF CONTROLLED SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about September 27, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a controlled substance of Schedule II, to wit: Cocaine, in violation of Criminal Law Article, Section 5-601(a)(1) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-601(a)(1)] CJIS Code 1-1111
Misdemeanor 1 year, \$5,000

COUNT TWENTY-SIX
(FIREARM/DRUG TRAFFICKING)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did, during and in relation to a drug trafficking crime, possess a firearm, to wit: a Smith & Wesson 9mm handgun, under sufficient circumstances to constitute a nexus to the drug trafficking crime, in violation of Criminal Law Article, Section 5-621(b)(1) of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-621(b)(1)] CJIS Code 1-0493
Felony 20 years, 5 year Mandatory Minimum

COUNT TWENTY-SEVEN
(FIREARM/DRUG TRAFFICKING)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did, during and in relation to a drug trafficking crime, possess a firearm, to wit: a revolver, under sufficient circumstances to constitute a nexus to the drug trafficking crime, in violation of Criminal Law Article, Section 5-621(b)(1) of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-621(b)(1)] CJIS Code 1-0493
Felony 20 years, 5 year Mandatory Minimum

COUNT TWENTY-EIGHT
(POSSESSION OF LARGE AMOUNT OF CONTROLLED DANGEROUS SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did unlawfully possess a controlled dangerous substance of Schedule II, to wit: Fentanyl, in an amount greater than 5 grams, in violation of Criminal Law Article, Section 5-612 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-612] CJIS Code 1-0881
Felony 5 year Mandatory Minimum, \$100,000

COUNT TWENTY-NINE
(POSSESSION OF LARGE AMOUNT OF CONTROLLED DANGEROUS SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did unlawfully possess a controlled dangerous substance of Schedule II, to wit: a mixture containing Fentanyl, in an amount greater than 28 grams, in violation of Criminal Law Article, Section 5-612 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-612] CJIS Code 1-0881
Felony 5 year Mandatory Minimum, \$100,000

COUNT THIRTY

(POSSESSION OF LARGE AMOUNT OF CONTROLLED DANGEROUS SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did unlawfully possess a controlled dangerous substance of Schedule I, to wit: Heroin, in an amount greater than 28 grams, in violation of Criminal Law Article, Section 5-612 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-612] CJIS Code 1-0881

Felony 5 year Mandatory Minimum, \$100,000

COUNT THIRTY-ONE

(POSSESSION OF LARGE AMOUNT OF CONTROLLED DANGEROUS SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did unlawfully possess a controlled dangerous substance of Schedule I, to wit: a mixture containing Heroin, in an amount greater than 28 grams, in violation of Criminal Law Article, Section 5-612 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-612] CJIS Code 1-0881

Felony 5 year Mandatory Minimum, \$100,000

COUNT THIRTY-TWO

(POSSESSION OF LARGE AMOUNT OF CONTROLLED DANGEROUS SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did unlawfully possess a controlled dangerous substance of Schedule II, to wit: Cocaine, in an amount greater than 448 grams, in violation of Criminal Law Article, Section 5-612 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-612] CJIS Code 1-0881

Felony 5 year Mandatory Minimum, \$100,000

COUNT THIRTY-THREE
(POSSESSION OF LARGE AMOUNT OF CONTROLLED DANGEROUS SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did unlawfully possess a controlled dangerous substance of Schedule II, to wit: Cocaine Base, in an amount greater than 448 grams, in violation of Criminal Law Article, Section 5-612 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-612] CJIS Code 1-0881
Felony 5 year Mandatory Minimum, \$100,000

COUNT THIRTY-FOUR
(POSSESSION WITH INTENT TO DISTRIBUTE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a controlled dangerous substance of Schedule II, to wit: Fentanyl, in sufficient quantity reasonably to indicate under all circumstances an intent to distribute and dispense a controlled dangerous substance, in violation of Criminal Law Article, Section 5-602(2) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-602] CJIS Code 1-1119
Felony 20 years, \$15,000

COUNT THIRTY-FIVE
(POSSESSION WITH INTENT TO DISTRIBUTE – FENTANYL)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did knowingly possess in sufficient quantity to indicate an intent to distribute a controlled dangerous substance containing fentanyl, in violation of Criminal Law Article, Section 5-608.1(a) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-608.1(a)] CJIS Code 1-0908
Felony 10 years

COUNT THIRTY-SIX
(POSSESSION WITH INTENT TO DISTRIBUTE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a controlled dangerous substance of Schedule I, to wit: Heroin, in sufficient quantity reasonably to indicate under all circumstances an intent to distribute and dispense a controlled dangerous substance, in violation of Criminal Law Article, Section 5-602(2) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-602] CJIS Code 1-1119
Felony 20 years, \$15,000

COUNT THIRTY-SEVEN
(POSSESSION WITH INTENT TO DISTRIBUTE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a controlled dangerous substance of Schedule II, to wit: Cocaine, in sufficient quantity reasonably to indicate under all circumstances an intent to distribute and dispense a controlled dangerous substance, in violation of Criminal Law Article, Section 5-602(2) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-602] CJIS Code 1-1119
Felony 20 years, \$15,000

COUNT THIRTY-EIGHT
(POSSESSION WITH INTENT TO DISTRIBUTE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a controlled dangerous substance of Schedule II, to wit: Cocaine Base, in sufficient quantity reasonably to indicate under all circumstances an intent to distribute and dispense a controlled dangerous substance, in violation of Criminal Law Article, Section 5-602(2) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-602] CJIS Code 1-1119
Felony 20 years, \$15,000

COUNT THIRTY-NINE
(POSSESSION WITH INTENT TO DISTRIBUTE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a controlled dangerous substance of Schedule I, to wit: Marijuana, in sufficient quantity to reasonably indicate under all circumstances an intent to distribute and dispense the same, in violation of Criminal Law Article, Section 5-602 of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-602] CJIS Code 1-0233
Felony 5 years, \$15,000

COUNT FORTY
(MANUFACTURE CDS)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did unlawfully manufacture a controlled dangerous substance of Schedule I, to wit: Marijuana, in violation of Criminal Law Article, Section 5-603 of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-603] CJIS Code 1-0660
Felony 5 years, \$15,000

COUNT FORTY-ONE
(POSSESSION OF CONTROLLED SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a controlled substance of Schedule II, to wit: Fentanyl, in violation of Criminal Law Article, Section 5-601(a)(1) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-601(a)(1)] CJIS Code 1-1111
Misdemeanor 1 year, \$5,000

COUNT FORTY-TWO
(POSSESSION OF CONTROLLED SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a controlled substance of Schedule I, to wit: Heroin, in violation of Criminal Law Article, Section 5-601(a)(1) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-601(a)(1)] CJIS Code 1-1111
Misdemeanor 1 year, \$5,000

COUNT FORTY-THREE
(POSSESSION OF CONTROLLED SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a controlled substance of Schedule II, to wit: Cocaine, in violation of Criminal Law Article, Section 5-601(a)(1) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-601(a)(1)] CJIS Code 1-1111
Misdemeanor 1 year, \$5,000

COUNT FORTY-FOUR
(POSSESSION OF CONTROLLED SUBSTANCE)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a controlled substance of Schedule II, to wit: Cocaine Base, in violation of Criminal Law Article, Section 5-601(a)(1) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-601(a)(1)] CJIS Code 1-1111
Misdemeanor 1 year, \$5,000

COUNT FORTY-FIVE
(POSSESSION OF MARIJUANA 10+ GRAMS)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a controlled substance of Schedule I, to wit: Marijuana, in an amount of 10 grams or more, in violation of Criminal Law Article, Section 5-601(a)(1) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-601(a)(1)] CJIS Code 1-1564
Misdemeanor 6 months, \$1,000

COUNT FORTY-SIX
(FIREARM POSSESSION – CRIME OF VIOLENCE/FELONY CONVICTION)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a regulated firearm, to wit: a Smith & Wesson 9mm handgun, after having been convicted of: a violation of 5-602 of the Criminal Law Article, in violation of Public Safety Article, Section 5-133(c) of the Maryland Code against the peace, government, and dignity of the State.

[PS 5-133(c)] CJIS Code 1-1609
Felony 15 years, 5 year Mandatory Minimum

COUNT FORTY-SEVEN
(REGULATED FIREARM: ILLEGAL POSSESSION)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did knowingly possess a regulated firearm, to wit: a Smith & Wesson 9mm handgun, after being convicted of a disqualifying crime to wit: a violation of 5-602 of the Criminal Law Article, a violation classified as a felony in the state, in violation of Public Safety Article, Section 5-133(b) of the Maryland Code against the peace, government, and dignity of the State.

[PS 5-133(b)] CJIS Code 1-1106
Misdemeanor 5 years, \$10,000

COUNT FORTY-EIGHT
(FIREARM POSSESSION – CDS CRIME)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a firearm, to wit: a Smith & Wesson 9mm handgun, after having been convicted of: a felony under title 5 of the Criminal Law Article and conspiracy to commit a felony under title 5 of the Criminal Law Article, in violation of Criminal Law Article, Section 5-622 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-622] CJIS Code 1-0692
Felony 5 years, \$10,000

COUNT FORTY-NINE
(FIREARM POSSESSION – CRIME OF VIOLENCE/FELONY CONVICTION)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a regulated firearm, to wit: a revolver, after having been convicted of: a violation of 5-602 of the Criminal Law Article, in violation of Public Safety Article, Section 5-133(c) of the Maryland Code against the peace, government, and dignity of the State.

[PS 5-133(c)] CJIS Code 1-1609
Felony 15 years, 5 year Mandatory Minimum

COUNT FIFTY
(REGULATED FIREARM: ILLEGAL POSSESSION)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did knowingly possess a regulated firearm, to wit: a revolver, after being convicted of a disqualifying crime to wit: a violation of 5-602 of the Criminal Law Article, a violation classified as a felony in the state, in violation of Public Safety Article, Section 5-133(b) of the Maryland Code against the peace, government, and dignity of the State.

[PS 5-133(b)] CJIS Code 1-1106
Misdemeanor 5 years, \$10,000

COUNT FIFTY-ONE
(FIREARM POSSESSION – CDS CRIME)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess a firearm, to wit: a revolver, after having been convicted of: a felony under title 5 of the Criminal Law Article and conspiracy to commit a felony under title 5 of the Criminal Law Article, in violation of Criminal Law Article, Section 5-622 of the Maryland Code against the peace, government, and dignity of the State.

[CR 5-622] CJIS Code 1-0692
Felony 5 years, \$10,000

COUNT FIFTY-TWO
(ILLEGAL POSSESSION AMMUNITION)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, on or about December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did possess ammunition after being prohibited from possessing a regulated firearm under PS 5-133(c) and PS 5-133(b), in violation of Public Safety Article, Section 5-133.1 of the Maryland Code against the peace, government, and dignity of the State.

[PS 5-133.1] CJIS Code 1-1285
Misdemeanor 5 years, \$10,000

COUNT FIFTY-THREE
(COMMON NUISANCE NARCOTIC)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, at least as early as February 2021 through December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did keep and maintain a common nuisance, to wit: a building located at 1240 W. Pratt Street, for the illegal manufacture, distribution, dispensing, storage, and concealment of a narcotic controlled dangerous substance of Schedule II, to wit: Fentanyl, in violation of Criminal Law Article, Section 5-605(a)(2) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-605(a)(2)] CJIS Code 1-1126
Felony 20 years, \$15,000

COUNT FIFTY-FOUR
(COMMON NUISANCE NARCOTIC)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, at least as early as February 2021 through December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did keep and maintain a common nuisance, to wit: a building located at 1240 W. Pratt Street, for the illegal manufacture, distribution, dispensing, storage, and concealment of a narcotic controlled dangerous substance of Schedule I, to wit: Heroin, in violation of Criminal Law Article, Section 5-605(a)(2) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-605(a)(2)] CJIS Code 1-1126
Felony 20 years, \$15,000

COUNT FIFTY-FIVE
(COMMON NUISANCE NARCOTIC)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, at least as early as February 2021 through December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did keep and maintain a common nuisance, to wit: a building located at 1240 W. Pratt Street, for the illegal manufacture, distribution, dispensing, storage, and concealment of a narcotic controlled dangerous substance of Schedule II, to wit: Cocaine, in violation of Criminal Law Article, Section 5-605(a)(2) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-605(a)(2)] CJIS Code 1-1126
Felony 20 years, \$15,000

COUNT FIFTY-SIX
(COMMON NUISANCE)

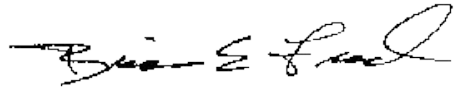
The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, at least as early as February 2021 through December 7, 2021, at or near 1240 W. Pratt Street, in Baltimore City, State of Maryland, did keep and maintain a common nuisance, to wit: a building located at 1240 W. Pratt Street, for the illegal manufacture, distribution, dispensing, storage, and concealment of a controlled dangerous substance, in violation of Criminal Law Article, Section 5-605 of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-605] CJIS Code 1-0239
Felony 5 years, \$15,000

COUNT FIFTY-SEVEN
(COMMON NUISANCE NARCOTIC)

The Jurors of the State of Maryland for the body of Anne Arundel County, do on their oath present that the aforesaid DEFENDANT, at least as early as June 2021 through December 7, 2021, at or near 1214 W. Cross Street, in Baltimore City, State of Maryland, did keep and maintain a common nuisance, to wit: a building located at 1214 W. Cross Street, for the illegal manufacture, distribution, dispensing, storage, and concealment of a narcotic controlled dangerous substance of Schedule II, to wit: Cocaine, in violation of Criminal Law Article, Section 5-605(a)(2) of the Maryland Code; against the peace, government and dignity of the State.

[CR 5-605(a)(2)] CJIS Code 1-1126
Felony 20 years, \$15,000



Brian E. Frosh
Maryland Attorney General

Paul Halliday (CPF 1412160364)
Assistant Attorney General
Organized Crime Unit
Maryland Attorney General's Office

TO THE PERSON CHARGED:

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

Defendant

Date/Time