

STATE OF MARYLAND VS. GERALD LEON SOLOMON JR.
IN THE CIRCUIT COURT FOR BALTIMORE COUNTY

INDICTMENT

The Jurors of the State of Maryland, for the body of Baltimore County, do on their oath present that GERALD LEON SOLOMON JR., on or about April 2, 2018, through and including August 9, 2019 in Baltimore County,

INTRODUCTION AND BACKGROUND

At all times relevant to this Indictment:

1. The Maryland Department of Public Safety and Correctional Services (DPSCS), is the state agency responsible for administering correctional facilities and pre-release centers in Maryland. The agency employs more than 11,000 individuals, including sworn correctional officers and fiscal personnel.

2. The DPSCS Financial Services Accounting – Payroll and Audit Unit is aligned under the Office of Secretary, located at 300 East Joppa Road, Towson, Maryland 2128, Suite 1000, in Baltimore County, Maryland.

3. DPSCS utilizes Time Clock Plus (“TCP”), an automated biometric time entry system, in conjunction with Workday, a human resources management program, to manage employee payroll and benefits data. Time Clock Plus biometrically identifies and validates users, records the in and out punches with the requisite worktags as required by Workday, synchronizes leave hours, and automatically transfers time data to Workday after requisite approvals.

4. Gerald Leon Solomon Jr. (“SOLOMON”) was employed by DPSCS as a sworn Correctional Sergeant, a position that constitutes a public officer under Maryland law

5. As a Correctional Sergeant, SOLOMON was required to clock in and out of Time Clock Plus at the beginning and again at the conclusion of each shift, to document the hours he worked. In the event that there were any discrepancies between the hours he worked and the hours documented at the end of a pay period, SOLOMON was required to bring the discrepancy to the attention of his assigned timekeeper.

6. Shantil Chetta Carter (“CARTER”) was employed as a Fiscal Technician I in the DPSCS Finance Service Accounting, Payroll and Audit Unit in Baltimore County, MD. CARTER is a State of Maryland employee.

7. As a Fiscal Technician I, CARTER was responsible for pulling information from Time Clock Plus into Workday and ensuring that the two systems matched. CARTER also recorded adjustments/exceptions in the Workday System and investigated and responded to supervisor inquiries regarding payroll issues and discrepancies. CARTER had the ability to access the payroll system and change the documented hours that a correctional officer worked. However, CARTER was not permitted to change documented hours without consultation and documentation from an employee’s supervisor.

8. From on or about April 2, 2018, through and including August 9, 2019, SOLOMON and CARTER engaged in a scheme whereby CARTER would alter SOLOMON’s timecard to add hours that he did not work, resulting in SOLOMON being paid money he did not earn. In return, SOLOMON would make occasional payments to CARTER.

9. Throughout the course of the scheme, CARTER altered SOLOMON’S timecard on more than thirty occasions, adding in total more than seven hundred (700) hours that SOLOMON did not work, resulting in SOLOMON being paid approximately \$27,018.07 for work he did not perform. In exchange, SOLOMON made payments totaling approximately \$1,706.00 to CARTER.

10. The alterations to the timecards resulting in the overpayments to SOLOMON occurred at the DPSCS Finance Service Accounting, Payroll and Audit Unit, located in Baltimore County, Maryland.

COUNT ONE

THEFT SCHEME: \$25,000 TO UNDER \$100,000

GERALD LEON SOLOMON, JR., did, between the dates of on or about April 2, 2018, through and including on or about August 9, 2019, pursuant to one scheme and continuing course of conduct, steal payroll funds of the State of Maryland having a value of \$27,018.07, at least \$25,000 but less than \$100,000, by knowingly, willfully, and intentionally receiving payment for work he did not perform, in violation of CR § 7-104 of the Annotated Code of Maryland and against the peace, government, and dignity of the State.

*CR §7-104
Penalty 10 years and/or \$15,000
CJIS Code 1-1139*

COUNT TWO

CONSPIRACY TO COMMIT THEFT

GERALD LEON SOLOMON, JR., did, between the dates of on or about April 2, 2018, through and including on or about August 9, 2019, conspire with SHANTIL CHETTA CARTER to, pursuant to one scheme and continuing course of conduct, steal payroll funds of the State of Maryland having a value of \$27,018.07, at least \$25,000 but less than \$100,000, by knowingly, willfully, and intentionally falsely inflating SOLOMON's timecards, resulting in SOLOMON

being paid for work he did not perform, in violation of the common law and against the peace, government, and dignity of the State.

Common Law
Penalty 10 years and/or \$15,000
CJIS Code 1C-1139

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

Pay period beginning April 25, 2018 and ending on May 8, 2018

1. On April 2, 2018, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Hey Ms Carter this pay period is strictly overtime strictly the cash OK*

Carter: *Hey, lol ok yea ima need some of that cash...lol*

Solomon: *No problem u got me I got u leo*

Carter: *That's right..TOGETHER*

2. On April 25, 2018, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *What time you want me to call you*

Carter: *Call me about 9:30 I will be there then, I have all day to fix it foreal...no one else no's that tho...*

Solomon: *That's y I fuck with you*

Carter: *Of course not bragging but I no how I get down and for those that run there mouths regarding what I do fuck them...I only help a selected bunch now with the real deal*

Solomon: *You kno I understand to the max*

Carter: *Hey I gave you some xtra I didn't touch all the lwop cause I didn't want them to check behind me, I took one out*

Solomon: *SO how much on the over came up 2*

Carter: *82 ot*

Solomon: *That's cool thank you so much.....*

Carter: *Of course*

Solomon: *Mother Day I got don't 4get*

Carter: *It's all good honey*

3. On May 4, 2018 SOLOMON AND CARTER engaged in the following text exchange:

Solomon: *Hey Ms Carter sorry to bother you I wanted to see if I can look out for you as far as you know your financial status that you told me about I need you to download the Cash app so I can send you a little something just to show you that I appreciate you and I'm willing to help you it's not much but it's something I have mortgage Payperiod. I but got you OK*

Carter: *Hey there...aww I totally appreciate whatever, I am definitely grateful to folks that reach out as I do...that's that Leo heart*

4. On May 5, 2018, SOLOMON sent \$150.00 to CARTER through the Cash App.

5. On May 5, 2018, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Next check I give you a little bit more I don't have to pay to many bills*

Carter: *GM...yes I have it and I totally appreciate that...thank you so much*

6. On May 7, 2018, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Hey can you check my time 2marr I do 16 hours ot that will put my Close to 80*

Solomon: *And I still got you with the rest of that money when I get paid the 16th*

Solomon: *I got me*

Carter: *That was a good thing to wake up too, now I wanna give u a big hug and*

Carter: *Dam lol I never sent this message from last week omg I'm so so sorry lol...I was geeking*

Carter: *I got you and your time u no that no worries at all we got until Wednesday*

Solomon: *Thank you I'm going to sent some more your way the 16 ok*

Solomon: *16th*

Carter: *Totally totally APPRECIATED*

7. On May 8, 2018 SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Hey ms carter you check that for me I should be close to 72 -80 after tonight*

Carter: *Not yet sweetie I'm still here but I got you*

Solomon: *Thanks*

Carter: *I always wait until the last day to do yours just In case I need to add something*

Solomon: *Ok*

Solomon: *Give me the address again to the place that you work at so I can send you something special like I said I was going to for you*

Carter: *300 E Joppa Road, suite 1000*

8. On May 9, 2018, CARTER altered SOLOMON'S timecard, adding hours that SOLOMON did not work to the pay period beginning on April 25, 2018 and ending on May 8, 2018.

9. On May 9, 2018 SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Did you look over the time for me*

Carter: *I did but I got locked out, waiting to get back in...I got u*

Solomon: *Sorry to bother did you get a chance yet*

Carter: *Yup and I saw fit that u have like 80 hrs of ot*

Solomon: *Thanks Ms Carter*

10. For the pay period beginning on April 25, 2018 and ending on May 8, 2018, SOLOMON received an overpayment of \$594.68 for hours he did not and was not otherwise entitled to receive.

Pay period beginning on May 9, 2018 and ending on May 22, 2018

11. On May 23, 2018, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Hey Ms Carter sorry to bother you did you ever get the amount of overtime at the end of the payroll.*

Solomon: *Pay period*

Carter: *Hey honey...I got you*

12. On May 23, 2018, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on May 9, 2018 and ending on May 22, 2018.

13. For the pay period beginning on May 9, 2018 and ending on May 22, 2018, SOLOMON received an overpayment of \$317.06 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on June 6, 2018 and ending on June 19, 2018

14. On June 12, 2018, SOLOMON texted CARTER:

Solomon: *Hey Ms Carter I don't want you to think that I forgot about you but I had a couple of transactions that was taken out my account that was on the fraud I had a check that was taken out my account for \$2460 so I end up closing my accounts and shutting down my cards the cards that are use my Cash app on it was the ones I shut down so that moment I get my cards or if I can meet you somewhere with the money and we greatly appreciate it trust me I'm trying to help you out more than anything because I know you did the same for me*

15. On June 20, 2019, SOLOMON and CARTER engaged in the following text exchange:

Carter: *Call the office phone please*

Solomon: *Give me a second I'm in Texas on my way home*

Solomon: *I was calling to what going on with my time*

Carter: *410-339-5835*

16. On June 20, 2018, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on June 6, 2018 and ending on June 19, 2018.

17. On June 21, 2018 CARTER texted SOLOMON:

Carter: *Hello, everything was fixed and I gave you some more ot*

18. For the pay period beginning on June 6, 2018 and ending on June 19, 2018, SOLOMON received an overpayment of \$1,213.94 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on June 20, 2018 and ending on July 3, 2018

19. On June 27, 2018, SOLOMON sent \$150.00 to CARTER through the Cash App.

20. On June 27, 2018, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *I sent you something*

Carter: *Thank you so much*

21. On July 3, 2018, CHIDUME and CARTER engaged in the following text exchange:

Solomon: *Hey Ms Carter sorry to bother you I just want to check and make sure I'm good as far as the overtime*

Carter: *No u good never a problem calling me period!*

22. On July 4, 2018, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on June 20, 2018 and ending on July 3, 2018.

23. For the pay period beginning on June 20, 2018 and ending on July 3, 2018, SOLOMON received an overpayment of \$1,185.70 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on July 4, 2018 and ending on July 17, 2018

24. On July 16, 2018, SOLOMON and CARTER engaged in the following pertinent communication via text message:

Solomon: *Can you help me*

Carter: *Yes of course*

25. On July 17, 2018, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Did you get a chance with that*

Carter: *Didn't I tell you to stop worrying*

26. On July 18, 2018, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on July 4, 2018 and ending on July 17, 2018.

27. For the pay period beginning on July 4, 2018 and ending on July 17, 2018, SOLOMON received an overpayment of \$1,320.17 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on August 1, 2018 and ending on August 14, 2018

28. On August 10, 2018 SOLOMON and CARTER engaged in the following text exchange:

Carter: *U took too long to respond to me lol making me nervous, don't be doing me like that*

Solomon: *Ok my bad look on cash app*

29. On August 10, 2018, SOLOMON sent \$150.00 to CARTER through the Cash App.

30. On August 15, 2018, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on August 1, 2018 and ending on August 14, 2018.

31. For the pay period beginning on August 1, 2018 and ending on August 14, 2018, SOLOMON received an overpayment of \$1,106.04 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on August 15, 2018 and ending on August 28, 2018

32. On August 28, 2018, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Hey ms Carter did you forget about me*

Carter: *Hey...lol how could I, never that I just knew I would get to you later that's all, I like to do yours last.*

33. On August 28, 2018, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on August 15, 2018 and ending on August 28, 2018.

34. For the pay period beginning on August 15, 2018 and ending on August 28, 2018, SOLOMON received an overpayment of \$325.30 for hours he did not work and was not otherwise entitled to receive.

Pay Period beginning on August 29, 2018 and ending on September 11, 2018

35. On September 11, 2018 SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Good morning Ms Carter wanted to see is it OK for me to verify my overtime by Tuesday I should be having close to 73*

Solomon: *Hey Ms Carter sorry to disturb you reason why I didn't call you was because I got activated for tech and I'm still 1 o'clock so is it OK for me to call you tomorrow morning to let you verify that I was that I've done for Tac*

Carter: *Yes that's perfectly fine...I got you the system won't close early*

36. On September 12, 2018, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on August 29, 2018 and ending on September 11, 2018.

37. On September 12, 2018 SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Sorry to bother did you check on that for me*

Carter: *Lol u must be tiered...I looked out earlier when u called me*

Solomon: *Do you mine me asking the total I kno we was trying to figure it out*

Carter: *It was 64 now it's 79*

Solomon: *Thank you*

38. For the pay period beginning on August 29, 2018 and ending on September 11, 2018, SOLOMON received an overpayment of \$500.24 for hours he did not work and he was not otherwise entitled to receive.

Pay period beginning on September 12, 2018 and ending on September 25, 2018

39. On September 21, 2018 SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Hey Ms Carter can I give you 150 Now then 150 with the first check in October I had me mortgage this Check oooo I look on Workday and Thursday Morning I work 7-3 and it not on workday*

Carter: *Hey, ok that's fine...and u no I will fix it*

Solomon: *Thanks*

Carter: *No thank you*

40. On September 24, 2018 SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Hey Ms. Carter just texting you to see if you still want me to do that for your just wanted to know and also wanted to see are you still want to verify that for me you gave me a text but I didn't understand it*

Carter: *Gm...yes I was trying to do it on the low that's y I was all over the place with the text. Yes I will still need the loan as you said that's fine I totally appreciate what you can help me with. I will be getting the rest of my money soon due to it being a large amount that they stole from my account. Thanks again*

Carter: *I was telling you I needed 900.00 so whatever you can help me with would gladly be appreciated...*

Solomon: *Ok*

Carter: *Thank you totally appreciate this...*

Solomon: *Like I said Ms Carter when I get paid October I'm a get you another 150 OK but I got to make sure my time is right because it didn't look right when I check it today OK so can you help me out with that and I appreciate it*

Carter: *I told you ever no worries I will always have you as far as your stuff goes*

41. On September 24, 2018, SOLOMON sent \$150.00 to CARTER through the Cash App.

42. On September 25, 2020, CARTER altered SOLOMON'S, adding hours SOLOMON did not work to the pay period beginning on September 12, 2018 and ending on September 25, 2018.

43. On September 26, 2018 SOLOMON and CARTER engaged in the following text exchange:

Carter: *Heyy, you already there do u want more added*

Solomon: *What ever is looking good I appreciate it.*

44. For the pay period beginning on September 12, 2018 and ending on September 25, 2018, SOLOMON received an overpayment of \$289.71 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on September 26, 2018 and ending on October 9, 2018

45. On October 4, 2018, CARTER altered SOLOMON'S timecard, adding hours to the pay period beginning on September 26, 2018 and ending on October 9, 2018.

46. On October 4, 2018 SOLOMON and CARTER engaged in the following text exchange:

Carter: *Heyyy...how are you and all that other good stuff. Wanted to no if you can still help and and just letting you no that I already made some changes to things and will do more lter...let me know either way please, thanks*

47. On October 5, 2018 CARTER texted SOLOMON:

Carter: *Gm, no pressure but if you can help I need it today buy 3 cause I gotta take care of that big bill today and as I said I got you I already started putting it back in your account*

48. On October 5, 2018, SOLOMON sent \$150.00 to CARTER through the Cash App.

49. On October 5, 2018 SOLOMON and CARTER engaged in the following text exchange:

Solomon: *I sent it to you*

Carter: *Thank you sooo much...and I got you*

50. On October 10, 2018, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on September 26, 2018 and ending on October 9, 2018.

51. For the pay period beginning on September 26, 2018 and ending on October 9, 2018, SOLOMON received an overpayment of \$761.88 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on October 10, 2018 and ending on October 23, 2018

52. On October 22, 2018, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Hey Ms Carter can you check my overtime for me*

Carter: *Hey honey ok I will*

53. On October 24, 2018, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on October 10, 2018 and ending on October 23, 2018.

54. On October 24, 2018, CARTER texted SOLOMON:

Carter: *I got you at 82*

55. For the pay period beginning on October 10, 2018 and ending on October 23, 2018, SOLOMON received an overpayment in the amount of \$530.37 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on October 24, 2018 and ending on October 23, 2018

56. On November 4, 2019, SOLOMON texted CARTER:

Solomon: *Hey Ms Carter sorry bother but time is not update I'm missing to overtime day*

Solomon: *Can you help me out a lil*

57. On November 6, 2018, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on October 24, 2018 and ending on November 6, 2018.

58. For the pay period beginning on October 24, 2018 and ending on October 23, 2018, SOLOMON received an overpayment in the amount of \$1,411.55 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on November 7, 2018 and ending on November 20, 2018

59. On November 19, 2018, SOLOMON texted CARTER:

Solomon: *I wanted to thank you for that overtime thing I heard that the pay period is closing early bc of the holiday... When you get time can we verify my time*

60. On November 19, 2018, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on November 7, 2018 and ending on November 20, 2018,

61. On November 20, 2018, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Everything good*

Carter: *Yup I just made it good*

Solomon: *Thank you what we looking like*

Carter: 82

62. For the pay period beginning on November 7, 2018 and ending on November 20, 2018, SOLOMON received an overpayment in the amount of \$738.58 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on November 21, 2018 and ending on December 4, 2018

63. On December 3, 2018 SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Gm Hey Ms Carter my time of course is mess up still....I know you got me can you help me out with it.....I still got you with that*

Carter: *Hey honey I ain't forget you...ima text ut later after 8 ish is that cool and thank you*

64. On December 3, 2018, SOLOMON sent \$206.00 to CARTER through the Cash App.

65. On December 4, 2018, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on November 21, 2018 and ending on December 4, 2018.

66. For the pay period beginning on November 21, 2018 and ending on December 4, 2018, SOLOMON received an overpayment in the amount of \$2070.25 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on December 5, 2018 and ending on December 18, 2018

67. On December 18, 2019, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Hey me Carter can you check on my overtime for me the clock wasn't working*

Carter: *Hey ok...,call me at 4:30*

68. On December 18, 2019, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on December 5, 2018 and ending on December 18, 2018.

69. On December 19, 2018, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Hey ms Carter is the time good*

Carter: *Ot is 91.85 and ima need half of that...just kidding but u good*

70. For the pay period beginning on December 5, 2018 and ending on December 18, 2018, SOLOMON received an overpayment in the amount of \$1,461.52 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on December 19, 2018 and ending on January 1, 2019

71. On January 2, 2019 SOLOMON texted CARTER:

Solomon: *Did you take care of that so I can look out for you*

72. On January 2, 2019, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on December 19, 2018 and ending on January 1, 2019.

73. On January 2, 2019 SOLOMON and CARTER engaged in the following text exchange:

Carter: *Done...*

Solomon: *What the total... Thanks*

Carter: *They only gave you 40 something...I made it 82, what would u like it to be?*

Solomon: *Thanks*

74. On January 9, 2019 SOLOMON and CARTER engaged in the following text exchange:

Carter: *Hey honey how are you...don't forget about me*

Solomon: *I'm not*

Carter: *Thank you*

75. On January 10, 2019, SOLOMON sent \$300.00 to CARTER through the Cash App.

76. On January 10, 2019, SOLOMON and CARTER engaged in the following text exchange:

Carter: *Thank you sooo much*

Solomon: *Can you look out for me Tuesday and do we get the 750 on the next check*

77. For the pay period beginning on December 19, 2018 and ending on January 1, 2019, SOLOMON received an overpayment in the amount of \$1,540.66 for hours he did not work and was not otherwise entitled to receive.

Pay Period beginning on January 2, 2019 and ending on January 15, 2019

78. On January 15, 2019, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Gm Ms Carter can you mae sure everything you good on my workday I'm working a double today 3-11 11-7*

Carter: *Gm...ok sweetheart I got you*

Carter: *Hey...how much OT u want*

Solomon: *The same last pay*

Carter: *Ok*

79. On January 15, 2019, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on January 2, 2019 and ending on January 15, 2019.

80. For the pay period beginning on January 2, 2019 and ending on January 15, 2019, SOLOMON received an overpayment in the amount of \$989.47 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on January 16, 2019 and ending on January 29, 2019

81. On January 25, 2019, SOLOMON texted CARTER:

Solomon: *Hey Ms Carter thank for checking on me about that can do me a favor I wanted to see if you can look out for this pay on the ot tip I want it to look k good plus with that 750. I got a couple of that I wanted to do that week*

82. On January 28, 2019, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Hey Ms. Carter did you get my message that I sent to you*

Carter: *Hey honey I did I got you*

83. On January 29, 2019, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Hey Ms Carter today make a little over 80 can you check and make sure everything good...I work b shift today*

Cater: *Hey, up I will*

Carter: *Hey lol...how much ot did you have on your own about 55?*

Solomon: *No like 83*

84. On January 29, 2019, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on January 16, 2019 and ending on January 29, 2019.

85. On January 30, 2019, CARTER again altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on January 16, 2019 and ending on January 29, 2019.

86. For the pay period beginning on January 16, 2019 and ending on January 29, 2019, SOLOMON received an overpayment in the amount of \$927.15 for hours he did not work and was not otherwise entitled to receive.

Pay Period beginning on February 13, 2019 and ending on February 26, 2019

87. On February 27, 2019, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *So I seen my hour and that fucking Shank only credit me for 44hours overtime..... Will be able to fix that for me*

Solomon: *Gm sorry to bother*

Carter: *Gm...yes I got you, I wasn't gonna fix it until the end to see what she did or did not do. I'm getting myself together now to go in and of course I got you.*

88. On February 27, 2019, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on February 13, 2019 and ending on February 26, 2019.

89. On February 27, 2019, SOLOMON and CARTER engaged in the following pertinent communication via text message:

Solomon: *Thank for helping with that...Ms Carter I have do something about the supervisor on my shift*

Carter: *Just hold up cause we don't want no come backs...thnk about it*

90. For the pay period beginning on February 13, 2019 and ending on February 26, 2019, SOLOMON received an overpayment in the amount of \$1,288.00 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on February 27, 2019 and ending on March 12, 2019

91. On March 11, 2019, SOLOMON texted CARTER:

Solomon: *Hey Ms Carter take care that for me and I will help you out with that it not going to be a lot but it's some thing*

92. On March 13, 2019, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on February 27, 2019 and ending on March 12, 2019.

93. On March 13, 2019, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Everything straight with that*

Carter: *Have I ever not taken care of things....lol*

Carter: *I'm your big sister and your family has to eat...*

Solomon: *Got you you kno I good for that*

Carter: *Right that's the only reason*

94. For the pay period beginning on February 27, 2019 and ending on March 12, 2019, SOLOMON received an overpayment in the amount of \$987.96 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on March 13, 2019 and ending on March 26, 2019

95. On March 22, 2019, SOLOMON and CARTER engaged in the following text exchange:

Carter: *Hey there...are you still gonna look out...trust me I wdnt ask if it was not needed*

Solomon: *Got you*

96. On March 22, 2019, SOLOMON sent \$135.00 to CARTER through the Cash App.

97. On March 27, 2019, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on March 13, 2019 and ending on March 26, 2019.

98. For the pay period beginning on March 13, 2019 and ending on March 26, 2019, SOLOMON received an overpayment in the amount of \$633.91 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on April 10, 2019 and ending on April 23, 2019

99. On April 23, 2019, SOLOMON and CARTER engaged in the following pertinent communication via text message:

Solomon: *Gm Ms Carter I wanted ask can check my time for me I should 80 I'm working this evening and nite 3-11 and 11-7. Do you want me to call you Wednesday morning*

Carter: *Hello...yes call me Wednesday morning*

100. On April 25, 2019, CARTER altered SOLOMON'S, adding hours SOLOMON did not work to the pay period beginning on April 10, 2019 and ending on April 23, 2019.

101. For the pay period beginning on April 10, 2019 and ending on April 23, 2019, SOLOMON received an overpayment in the amount of \$353.19 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on April 24, 2019 and ending on May 7, 2019

102. On May 8, 2019, SOLOMON texted CARTER:

Solomon: *Good morning Ms Carter I'm mssing a day Which is Yesterday I work 3-11. All together I will have over 80 hour overtime. Can you take care that for me I got something for you on the Mother day tip.*

103. On May 8, 2019, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on April 24, 2019 and ending on May 7, 2019.

104. For the pay period beginning on April 24, 2019 and ending on May 7, 2019, SOLOMON received an overpayment in the amount of \$428.23 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on May 8, 2019 and ending on May 21, 2019

105. On May 21, 2019, SOLOMON texted CARTER:

Solomon: *Davis Carter just calling you to check on my overtime in the morning I'll call you before 1030 I should have 80 out with a check or pay any only credit me for 72 I believe*

106. On May 22, 2019, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on May 8, 2019 and ending on May 21, 2019.

107. For the pay period beginning on May 8, 2019 and ending on May 21, 2019, SOLOMON received an overpayment in the amount of \$629.16 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on May 22, 2019 and ending on June 4, 2019

108. On June 5, 2019, CATER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on May 22, 2019 and ending on June 4, 2019.

109. On June 5, 2019, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Do you kno the amount is was ot*

Carter: *After everything went over it's like 70 something.*

Solomon: *Ok thanks*

110. For the pay period beginning on May 22, 2019 and ending on June 4, 2019, SOLOMON received an overpayment in the amount of \$1,531.03 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on June 5, 2019 and ending on June 18, 2019

111. On June 12, 2019, SOLOMON and CARTER engaged in the following text exchange:

Carter: *Good morning...if possible do you think you can donate me some leave, I'm asking everybody, have not gotten paid for 2 pays now so ima need some help if possible, just a little will do so I can get paid, thanks again*

Solomon: *Got u*

Carter: *Thanks just making sure you understand the message*

112. On June 14, 2019, SOLOMON and CARTER engaged in the following text exchange:

Carter: *Hey when u get a chance give me a call please, thanks*

113. On June 18, 2019, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Hey Ms Carter that damn women had my phone mad bc she didn't know the password I'm at work what's wrong*

Carter: *Hey lol...I was just saying that I was looking out so you could cause I needed the help that's all because again I didn't get paid...lol you better be a good boy don't be doing nothing bad lol*

Solomon: *I'm not wrong you need me to do*

Carter: *I meant don't do nothing bad regarding your wife lol stay out of trouble*

Solomon: *I'm not doing nothing some just can let go...What you need me to do for your I got 80 hours but of course it's not showing so I guess I will wait Wednesday*

Carter: *I wanted you to just send me a couple of dollars that's all...I was saying that's y I made sure u was good last time cause I knew I was gonna ask you for some change lol that's all*

Solomon: *When do you need it by*

Carter: *I needed it last week so whenever you can help, that's all*

Solomon: *Ok*

114. On June 19, 2019, SOLOMON sent \$100.00 to CARTER through the Cash App.

115. On June 19, 2019, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on June 5, 2019 and ending on June 18, 2019.

116. On June 19, 2019, SOLOMON and CARTER engaged in the following pertinent text exchange:

Solomon: *Did you get that I send*

Solomon: *You know the ot amount*

Carter: *OMG it was only 40 something but it's 82 now*

Solomon: *Thank you*

117. For the pay period beginning on June 5, 2019 and ending on June 18, 2019, SOLOMON received an overpayment in the amount of \$1,484.00 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning July 31, 2019 and ending on August 14, 2019

118. On July 31, 2019, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *I'm short almost 20 hours*

Carter: *I told you I got this right...so you should be looking out for me*

Solomon: *I get you nice birthday gift that my word*

119. On August 1, 2019, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work to the pay period beginning on July 17, 2019 and ending on July 30, 2019.

120. For the pay period beginning on July 17, 2019 and ending on July 30, 2019, SOLOMON received an overpayment in the amount of \$659.83 for hours he did not work and was not entitled to receive.

Pay period beginning on July 31, 2019 and ending on August 14, 2019

121. On August 9, 2019, SOLOMON and CARTER engaged in the following pertinent communication via text message:

Carter: *Hey did I miss your birthday...*

Carter: *HAPPY BIRTHDAY ENJOY*

Solomon: *No did I miss yours*

Carter: *It's TODAY*

Solomon: *I know*

122. On August 9, 2019 SOLOMON sent \$200.00 to CARTER through the Cash App.

123. On August 13, 2019, SOLOMON texted CARTER:

Solomon: *Hey Ms Carter can you check on my overtime...I suppose to have 64*

124. On August 14, 2019, SOLOMON and CARTER engaged in the following text exchange:

Solomon: *Hey ms Carter did you get a chance*

Carter: *Not yet doing it now*

125. On August 14, 2019, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work for the pay period beginning on July 31, 2019 and ending on August 14, 2019.

126. For the pay period beginning on July 31, 2019 and ending on August 14, 2019, SOLOMON received an overpayment in the amount of \$1,072.62 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on August 14, 2019 and ending on August 27, 2019

127. On August 27, 2019, SOLMON and CARTER engaged in the following text exchange:

Solomon: *I suppose to have 65 but I only see 50 I know you got me*

128. On August 27, 2019, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work for the pay period beginning on August 14, 2019 and ending on August 27, 2019.

129. For the pay period beginning on August 14, 2019 and ending on August 27, 2019, SOLOMON received an overpayment of \$431.74 for hours he did not work and was not otherwise entitled to receive.

Pay period beginning on August 28, 2019 and ending on September 10, 2019

130. On September 10, 2019, SOLMON texted CARTER:

Solomon: *Hey Ms Carter I will be free tomorrow after I get my hair cut I'm bring that for you....I need to talk to you about something and I suppose to have 80 this check of course it not right but tonite is my last day*

131. On September 11, 2019, CARTER altered SOLOMON'S timecard, adding hours SOLOMON did not work for the pay period beginning on August 28, 2019 and ending on September 11, 2019.

132. For the pay period beginning on August 28, 2019 and ending on September 10, 2019, SOLOMON received an overpayment in the amount of \$234.13 for hours he did not work and was not otherwise entitled to receive.

COUNT THREE

MISCONDUCT IN OFFICE

From on or about April 25, 2011 through and including on or about September 10, 2019, at Baltimore County, Maryland, SOLOMON, in violation and perversion of his duties as a sworn correctional officer, did corruptly commit misconduct in office by knowingly, willfully and intentionally, under color of his office, falsely inflating his timecard to receive payroll payments

for hours he did not work and was not otherwise entitled to receive, in violation of the common law and against the peace, government and dignity of the State.

Common Law

Penalty: Anything not cruel and unusual

CJIS Code 2-0645

THE GRAND JURY further avers and alleges that the offenses charged hereinabove were against the peace, government, and dignity of the State.

By: CHARLTON T. HOWARD III
STATE PROSECUTOR

/S/ Lindsay E. Bird

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