

**STATE OF MARYLAND VS. SHANTIL CHETTA CARTER**  
**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 SHANTIL CHETTA CARTER, on or about April 2, 2018, through and including October 13, 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. Okezie Gerard Chidume aka Gerard Okezie Mehnobi (“CHIDUME”) was employed by DPSCS as a sworn Correctional Officer II, a position that constitutes a public officer under Maryland law.

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

6. As correctional officers, CHIDUME and SOLOMON were 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 they worked. In the event that there were any discrepancies between the hours they worked and the hours documented at the end of a pay period, CHIDUME and SOLOMON were required to bring the discrepancy to the attention of their assigned timekeeper.

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

8. 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.

9. From on or about June 5, 2018, through and including October 13, 2019, CHIDUME and CARTER engaged in a scheme whereby CARTER would alter CHIDUME's timecard to add hours that he did not work, resulting in CHIDUME being paid money he did not earn. In return, CHIDUME would make payments to CARTER.

10. Throughout the course of the scheme, CARTER altered CHIDUME's timecard on approximately twenty-six (26) occasions, adding in total more than one thousand (1,000) hours

that CHIDUME did not work, resulting in CHIDUME being paid approximately \$33,858.80 for work he did not perform. In exchange, CHIDUME made payments totaling approximately \$4,910 to CARTER.

11. 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 payments to CARTER.

12. 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.

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

### **COUNT ONE**

#### **CONSPIRACY TO COMMIT THEFT--CHIDUME**

SHANTIL CHETTA CARTER, did, between the dates of on or about June 5, 2018, through and including on or about October 13, 2019, conspire with OKEZIE GERARD CHIDUME to, pursuant to one scheme and continuing course of conduct, steal payroll funds of the State of Maryland having a value of \$33,858.80, at least \$25,000 but less than \$100,000, by knowingly, willfully, and intentionally falsely inflating CHIDUME's timecards, resulting in

CHIDUME 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 TO COMMIT THEFT WITH CHIDUME**

**Pay period beginning May 23, 2018 and ending on June 5, 2018**

1. On May 16, 2018, CHIDUME and CARTER engaged in the following text exchange:

Carter:       *Hey, didn't wanna say it over the phone but I will fix it so you can get the hours due to you but I will call HR about that IWIF stuff...buy the way this is Carter from payroll*

Chidume:      *Oh ok...thanks a lot sweetie*

Chidume:      *What's your first name*

Chidume:      *I owe you*

Carter:        *Shantil...*

Chidume:      *Sweet...You can call me Gerard*

2. On May 20, 2018, CHIDUME and CARTER engaged in the following text exchange:

Chidume:      *On my way to work*

Carter:        *Wowww ok baby get that OT so we can take that special trip lol*

Chidume:      *Lol...indeed*

3. On May 25, 2018, CHIDUME and CARTER engaged in the following text exchange:

Chidume:      *Just woke up. Thought I speak with you before I go in to work*



10. On June 12, 2018, CHIDUME and CARTER engaged in the following pertinent conversation via text message:

Chidume: *Were you able to it?*

Carter: *Let me look now*

Carter: *U have 80 hrs of reg*

11. On June 18, 2018, CHIDUME and CARTER engaged in the following text exchange:

Chidume: *Can you use me RRP days in place of my sick days instead?*

Carter: *If you don't chill out ima kiss all over you...I told you that ima take care of your entire workday on the last day SWEETHEART*

12. On June 20, 2018 CHIDUME and CARTER engaged in the following text exchange:

Carter: *I also no that u no if you keep me around then you will be ok as far as payroll and honestly u will cause I got you on that ALWAYS! But u just fake making me feel good to maintain me in your pocket...but lol it's a smart move...you winning for now lol*

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

14. For the pay period beginning on June 6, 2018 and ending on June 19, 2019, CHIDUME received an overpayment in the amount of \$968.89 for hours he did not work and was not otherwise entitled to receive.

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

15. On June 26, 2018, CHIDUME and CARTER engaged in the following text exchange:

Carter: *Did you need some money for real?*

Carter: *I hope not, that's y I made sure u got extra so I could include the 350 u gave me...are u ok foreal*

Chidume: *I need some but I wouldn't ask you directly...*

Chidume: *And thank you very, very, very, very much for looking...You have no idea how appreciative I am for all you have...*

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

Chidume: *Ok...look out for poor old me please...I know always do anyways.*

Carter: *As long as you do as I'm asking you it will work*

Carter: *Meaning your time etc*

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

18. For the pay period beginning on June 20, 2018 and ending on July 3, 2018, CHIDUME received an overpayment in the amount of \$1,333.18 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**

19. On July 8, 2018, CARTER texted CHIDUME:

Carter: *Just wanted to apologize to you for being perturbed with you. When I asked you about the cash app thingy it's always you analyzing EVERYTHING PERIOD, sometimes in life we need to take a step back and see things in others eyes then make decisions especially if it's someone special in your life, regardless of what I say to you it's always a reasons from you to do things your way or another way, and trust me I trust your views and I appreciate them but sometimes you have to learn to trust mines too. Now everything u ever gave me I gave back plus extras so of course I no u have helped me but I needed something now and sometimes there will be needing things now not later even from u, I will give/help you the same period without questions etc because that's what I do for folks I care about. U can write me 1000's of checks but that's not giving me money now, those have to be deposited and that takes time, u never carry cash so it's my lost if I need it from you right away. Please accept my apologies as I will never ask you again for no "emergency" money...*

20. On July 18, 2018, CHIDUME and CARTER engaged in the following text exchange:

Carter: *Hey...if possible can you give me some money that will last until payday...*

Chidume: *A white envelope ontop my mailbox addressed to you. Not sure, it will last that long but it's my all...*

Carter: *Ha? U didn't have to give me your all, I feel bad now I fee like I don't want to take it...*

Chidume: *B---- Oh hush and take it...*

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

22. For the pay period beginning on July 4, 2018 and ending on July 17, 2018, CHIDUME received an overpayment in the amount of \$932.22 for hours he did not work and was not otherwise entitled to receive.

**Pay period beginning on July 18, 2018 and ending on July 31, 2018**

23. On August 1, 2018, CARTER altered CHIDUME's timecard, adding hours CHIDUME did not work to the pay period beginning on July 18, 2018 and ending on July 31, 2018.

24. For the pay period beginning on July 18, 2018 and ending on July 31, 2018, CHIDUME received an overpayment in the amount of \$989.08 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**

25. On August 3, 2018, CHIDUME and CARTER engaged in the following text exchange:

Chidume: *18 hours overtime for me?*

Carter: *When*

Chidume: *Extra from last time*

26. On August 4, 2018, CHIDUME and CARTER engaged in the following text exchange:



Chidume: *I love you very deeply..if I didn't, I won't be doing this right now...and no am not with you for money and payroll... I was racking up OT before I met you..and my family is quite well to do*

Carter: *I never said u needed me for money read the text right! I said I'm your payroll person!*

27. On August 16, 2018, CHIDUME and CARTER engaged in the following text exchange:

Chidume: *So please can you lift me up to max 🏠?*

Chidume: *59?*

Carter: *I can't it's gone you shoulda been asked, I didn't think u wanted any OT cause u normally would ask*

Chidume: *I didn't, because you said you was already on top of it.*

Carter: *Nope I am and I will be on top of your ot only if you ask me to handle it, I told you that from the beginning*

Chidume: *But you usually look at mine even without me asking..I understand if you're pissed..thanks a million or the past though*

Carter: *Y would I be pissed...for what, I have no reason to be*

Chidume: *Ok..Can you put the 59 on for the next check then?*

Carter: *Yup I will just remind me*

28. On August 16, 2018, later that same day, CHIDUME and CARTER engaged in the following text exchange:

Chidume: *My check is gonna be really f--ked up.*

Carter: *Oh well that's not my fault..and in my opinion if you stop worry about other bullshit and concentrate on getting your money*

Chidume: *Yes..it is somewhat..you were supposed to be on top of it without me asking*

Carter: *Not being smart but Naaaa im not going to do anything ur money unless u ask me too*

Chidume: *From now on, you got my approval to do anything without asking me*

Carter: *Don't take this the wrong way but maybe if you treated me a little better than possibly I would feel I could take the lead on making sure you are good...the ONLY thing u ask me if I'm good on is gas in my car, I only get from you if I ask for it...*

Carter: *And it's not a "do for me and I do for you thing" it's just sometimes it's nice to receive without asking, that's all*

Carter: *Don't get mad just understand what I'm saying please*

Chidume: *Mmmm..*

Chidume: *So you cost me all this cheddar because of that?*

Carter: *Wait I'm just seeing this...how the hell did I cost you any money, you are so cheap with everything this is how I no we could never make it as husband and wife...Anything you have ever gave me I've given back except for 20 and some gas in my car...If you brought me something that was because it's a birthday present. The message I sent you evidently you don't understand nothing I said for you to send a message back as such.*

Chidume: *Lol...confused? Yes, we can make it as husband and wife... You cost me money has to with my upcoming paycheck being screwed up, and not because of the money I spend of you..I don't mind spending on you, as my girl, that's what am supposed to do. That being said, You like saying that but am not cheap. I am reasonable.. You spend a a lot..*

29. On August 19, 2018, CHIDUME texted CARTER:

Chidume: *GM when are you coming to get your stuff?*

30. On August 20, 2018, CARTER altered CHIDUME's timecard, adding hours CHIDUME did not work to the pay period beginning on August 1, 2018 and ending on August 14, 2018. Although the hours were added on August 20, 2018, they were not submitted until August 27, 2018, after the pay period had closed, causing those additional hours to be credited to the pay period ending on August 28, 2018.

31. On August 27, 2018, CHIDUME and CARTER engaged in the following text exchange:

Chidume: *Hey, am outside at your job...*

Chidume: *Downstairs*

Chidume: *Can you come down?*

Carter: *We're are you*

Carter: *Your visit really made my day, thank you I needed that closeness from you...I LOVE YOU*

Chidume: *Aww Www...you're Welcome. 😘😘your face, hugging, 🍷, and watching you smile..thanks a million..*

*I ❤️ YOU MORE*

Carter: *AND OMG I LOVEEEE THE PERFUME AND THE TRUMP TOILET PAPER MY MOM IS GOING TO LOVE IT*

32. On August 27, 2018, CARTER altered CHIDUME's timecard, adding hours CHIDUME did not work to the pay period beginning on August 1, 2018 and ending on August 14, 2018. Although the hours were added on August 20, 2018, they were not submitted until August 27, 2018, after the pay period had closed, causing those additional hours to be credited to the pay period ending on August 28, 2018.

33. On August 29, 2018, CARTER again altered CHIDUME's timecard, adding hours CHIDUME 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, CHIDUME received an overpayment in the amount of \$2,573.41 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 4, 2018, CHIDUME and CARTER engaged in the following text exchange:

Carter: *Ima make arrangements to pay my phone bill our next pay off of you giving me some of the money as well that's y I asked*

Carter: *No response?*

Chidume: *I responded*

Chidume: *I said sure*

Carter: *Ok thanks*

Chidume: *But it got be hefty*

Carter: *I'm not doing this with you via your demands first what do u mean hefty*

Chidume: *59hrs at least. Just asking nicely*

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

37. For the pay period beginning on August 29, 2018 and ending on September 11, 2018, CHIDUME received an overpayment in the amount of \$539.93 for hours he did not work and was not otherwise entitled to receive.

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

38. On September 26, 2018, CARTER altered CHIDUME's timecard, adding hours CHIDUME did not work for the pay period beginning on September 12, 2018 and ending on September 25, 2018.

39. For the pay period beginning on September 12, 2018 and ending on September 25, 2018, CHIDUME received an overpayment in the amount of \$1,319.68 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**

40. On September 30, 2018, CARTER texted CHIDUME:

Carter: *Thank you again for the money*

41. On October 7, 2018, CARTER texted CHIDUME:

Carter: *Nevertheless, I just had a thought that if you can get me that other 400 and when I give you the 64 hours to make 80 then that will be an extra 1400 so you can pocket the 400 so you will come out still getting money too...*

42. On October 10, 2018, CARTER altered CHIDUME's timecard, adding hours CHIDUME did not work to the pay period beginning on September 26, 2018 and ending on October 9, 2018. Although the hours were added on October 10, 2018, they were submitted after the pay period had closed, causing those additional hours to be credited to the pay period ending on October 23, 2018.

43. On October 10, 2018, CHIDUME and CARTER engaged in the following text exchange:

Carter: *Hey...debt done lol..you only had 15 I added 32...sad case this time cause your ass ain't worked it*

Chidume: *Thanks..but can you do 60+ please?*

Carter: *I will see if I can get back in*

Chidume: *YOk...thanls*

Carter: *Hard...off to much....now 56 that's it*

Chidume: *Add more later?*

Carter: *Yup whenever your behind wanna stop playing with your money*

44. On October 23, 2018, CARTER altered CHIDUME's timecard, adding hours CHIDUME did not work to the pay period beginning on October 10, 2018 and ending on October 23, 2018.

45. For the pay period beginning on October 10, 2018 and ending on October 23, 2018, CHIDUME received an overpayment in the amount of \$2,782.32 for hours he did not work and for which he was not otherwise entitled to receive.

**Pay period beginning on October 24, 2018 and ending on November 6, 2018**

46. On November 6, 2018, CARTER texted CHIDUME:

Carter: *Woww you too, and funny you couldn't even tell me what you wanted and I no it's some ot, just as I've looked out for your and you've helped me, it's fine I will look at it, as much as I try I truly can't with you*

47. On November 7, 2018, CARTER altered CHIDUME's timecard, adding hours CHIDUME did not work to the pay period beginning on October 24, 2018 and ending on November 06, 2018.

48. For the pay period beginning on October 24, 2018 and ending on November 6, 2018, CHIDUME received an overpayment in the amount of \$1015.40 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**

49. On November 15, 2018, CHIDUME and CARTER engaged in the following text exchange:

Chidume: *Can you please look at my time?*

Carter: *What do u need it to be*

Chidume: *80+ OT*

50. On November 15, 2018, CARTER altered CHIDUME's timecard, adding hours CHIDUME did not work to the pay period beginning on November 7, 2018 and ending on November 20, 2018.

51. On November 20, 2018, CARTER altered CHIDUME's timecard, adding hours CHIDUME did not work to the pay period beginning on November 7, 2018 and ending on November 20, 2018

52. For the pay period beginning on November 7, 2018 and ending on November 20, 2018, CHIDUME received an overpayment in the amount of \$867.80 for hours he did not work and was not otherwise entitle to receive.

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

53. On November 25, 2018, CARTER texted CHIDUME:

Carter: *Trying to put some finances together so I'm just making sure u still gonna look out for me while I'm looking out for your, no it's not about the hook up that I do for your but it's gotta be about it now cause we both need it...I need some money put into my account on payday, let me no or maybe I can get my son to pick up a check...we will work it out*

54. On November 28, 2018 CHIDUME paid CARTER \$350.00 via check.

55. On November 28, 2018, CHIDUME and CARTER engaged in the following pertinent communication via text message:

Carter: *Soooo are u making that trip or what*

Chidume: *What trip?*

Carter: *To the bank*

Chidume: *Did you check your account???*

Carter: *No*

Chidume: *Seriously??*

Cater: *Thank you..*

Chidume: *No*

Chidume: *Thank you*

56. On November 29, 2018, CHIDUME and CARTER engaged in the following pertinent communication via text message:

Chidume: *So you got me on that 88 to 90 hours? [emojis]*

Carter: *Really*

Chidume: *Did I say something wrong?*

Carter: *Ok so how much money am I getting*

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

58. On December 5, 2018, CARTER altered CHIDUME'S timecard, adding hours CHIDUME did not work to the pay period beginning on November 21, 2018 and ending on December 4, 2018.

59. For the pay period beginning on November 21, 2018 and ending on December 4, 2018, CHIDUME received an overpayment in the amount of \$2,855.57 for hours he did not work was not otherwise entitled to receive.

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

60. On December 10, 2018, CHIDUME and CARTER engaged in the following text exchange:

Carter: *And I asked you last week if I make sure you get all those hours can u pay my bill you said yes now u acting like u got a problem with it..but ok I see what u doing*

Chidume: *Not acting anyway. Just confirming what you said by stating that it's business as usual.*

61. On or about December 13, 2018, CHIDUME paid CARTER \$300.00 via check.



62. On December 13, 2018, CHIDUME and CARTER engaged in the following text exchange:

Carter: *Hey, if you deposited that 300 in my account I needed 390.00 and that's what I told you and that's y I made sure you had all that extra time*

Carter: *I also told you that I wanted to do it a couple of more times to get caught up on something until Sarah comes back probably in Feb or March*

Chidume: *Send me a text where you specifically said \$390. If you had calllllled back this morning maybe we could have talked. You said you needed it tomorrow for a bill. So I waited and waited and waited and waited for you to call me with the figure...you. You..you didn't.*

Chidume: *So fearing that I might be drafted tomorrow and you not being able to pay the bill on Friday. I out of frustration decided to go put in that amount after waiting for your return call that never came through*

63. On December 18, 2018, CARTER altered CHIDUME's timecard, adding hours CHIDUME did not work to the pay period beginning on December 5, 2018 and ending on December 18, 2018.

64. For the pay period beginning on December 5, 2018 and ending on December 18, 2018, CHIDUME received an overpayment in the amount of \$1,859.26 for hours he did not work and was not otherwise entitled to receive.

**Pay period beginning on December 19, 2018 and ending on December 31, 2018**

65. On December 24, 2018, CHIDUME and CARTER engaged in the following text exchange:

Carter: *Please don't forget about the 400 that's what I wanted to say but I have something to tell you*

Chidume: *Yeah yeah*

Chidume: *Can't do it this time*

Carter: *Ok cool when I get back to work ima take all back that I gave you extra to make the over 80hrs of ot...thanks again*

Carter: *Remember I did that to help us both and u agreed so now I'm done! U shorted me last pay with the 90 now this time none ok*

Carter: *I got you over an extra 1000 and I can't get 400 wowwww what a stab in the back*

66. On December 27, 2018, CHIDUME and CARTER engaged in the following text exchange:


Chidume: *Please I am trying to pay a \$10,000 bill. So can I at least get a 90?*

Carter: *Soooo I'm trying to pay off a bill as well that's y I said to you in the beginning that we need to do this for 3-4 pay periods*


67. On or about December 27, 2018, CHIDUME paid CARTER \$400.00 via check.

68. On January 2, 2019, CHIDUME and CARTER engaged in the following text exchange:

Carter: *Hey do u have any extra to help me out with...not being smart but yes or no meaning you don't have to tell me a story or keep chastising me for my mistakes as you do, but next pay it won't be like this I just want to take care of my phone as well that's is scheduled to be off tomorrow and u no what I really don't care at all but ima try so if not no worries at all...*

Chidume:  *I TRULY, truly, deeply very very sorry sunshine but I D🙄n't my dear. I feel bad.*

Carter: *Ok but you do have the 4 or 5*

Chidume: 

Carter: *Which one*

Chidume: *4*

Carter: *Ok*

69. On January 2, 2019, CARTER altered CHIDUME's timecard, adding hours CHIDUME did not work to the pay period beginning on December 19, 2018 and ending on December 31, 2018.

70. On or about January 10, 2019, CHIDUME paid CARTER via check in the amount of \$400.00.

71. For the pay period beginning on December 19, 2018 and ending on December 31, 2018, CHIDUME received an overpayment in the amount of \$1,605.34 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**

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

73. For the pay period beginning on January 2, 2019 and ending on January 15, 2019, CHIDUME received an overpayment in the amount of \$2,245.37 for hours he did not work and for which he otherwise was not entitled to receive.

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

74. On January 23, 2019, CHIDUME and CARTER engaged in the following text exchange:

Carter: *Hey...I don't want to wake up up just letting u no I'm scheduling this payment to come out of my account tomorrow at 10*

Chidume: *Why would you schedule it to come out that early? What's wrong with the usual timeframe?*

Carter: *U normally deposit into my account early on Thursday that's y I did that*

75. On or about January 24, 2019, CHIDUME paid CARTER \$400 via check.

76. On January 30, 2019, CHIDUME and CARTER engaged in the following text exchange:

Carter: *Heyyy...soooo if I do it this time can u give me the 5 so I can be done with my bill, u only have 40hrs ot so ima add some more*

77. On January 30, 2019, CARTER altered CHIDUME's timecard, adding hours CHIDUME did not work to the pay period beginning on January 16, 2019 and ending on January 29, 2019.

78. For the pay period beginning on January 16, 2019 and ending on January 29, 2019, CHIDUME received an overpayment in the amount of \$1,893.61 for hours he did not work and was not otherwise entitled to receive.

**Pay Period beginning January 30, 2019 and ending on February 12, 2019**

79. On February 5, 2019, CHIDUME and CARTER engaged in the following text exchange:

Carter: *I see you really made out on your pay this period...ain't been that much in a while, I only checked cause a couple of people asked me to check there's so I did yours as well...lol( not you )but folks be funny when asking for things but yet can't help when we ask them for help...*

Chidume: *Actually, I didn't sweetie..lol. Could you fix the sick days for me pleaseeeee?*

Carter: *Wait...yes u did I looked back and u ain't made 5 grand since oct of last year...it's sad that u won't be grateful for receiving money you ain't even work for, I should be asking for more than 500...*

Carter: *It's not like I can buy me a pair of shoes I gotta pay bills*

Chidume: *W@w! Oh ok. Sorry I asked at all*

80. On or about February 8, 2019, CHIDUME paid CARTER \$500.00 via check.

81. On February 13, 2019, CARTER altered CHIDUME's timecard, adding hours CHIDUME did not work to the pay period beginning on January 30, 2019 and ending on February 12, 2019.

82. For the pay period beginning on January 30, 2019 and ending on February 12, 2019, CHIDUME received an overpayment in the amount of \$1,167.60 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**

83. On February 22, 2019, CHIDUME and CARTER engaged in the following text exchange:

Carter: *Hello...what time are you gonna make the deposit, you no I have that bill coming directly out of my account*

Carter: *Lol they calling my phone now...I hate disturbing your sleep, and your check did go into your new account*

Carter: *The mgr name is Mr Royal 410-358-8221, just tell him you are paying the bill for me, he will be there until 7*

Carter: *I will bulk up OT as much as I can this pay*

Chidume: *Do what u can no stresses*

84. On February 24, 2019, CHIDUME and CARTER engaged in the following text exchange:

Carter: *Are you gonna put that money in my account or do I have to come get it*

Chidume: *That's okay, you don't need to. I will make the deposit*

Carter: *Good*

85. On or about February 25, 2019, CHIDUME paid CARTER \$240.00 via personal money order.

86. On February 27, 2019, CHIDUME and CARTER engaged in the following text exchange:

Carter: *Greetings Mr O...do you want me to fix this ugly time crap of yours? Yes or no please thank you*

Chidume: *Greetings MS SL. Of course I would want you to fix that ugly time crap..please remember the extra time from the previous one.*

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

88. For the pay period beginning on February 13, 2019 and ending on February 26, 2019, CHIDUME received an overpayment in the amount of \$1,929.04 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**

89. On or about March 5, 2019, CHIDUME paid CARTER \$400.00 via check.

90. On March 10, 2019, CHIDUME and CARTER engaged in the following text exchange:

Chidume: *So far I haven't given \$4800 on my end since October ending. I thought you said you required \$3000+ to pay off the bad car loan that was in your name?*

Chidume: *A little over 3000?*

Carter: *Ok sooo none of my business matters, so what are u really saying, but I will say there is no way I'm giving you 60+ hours and get nothing in return, it's not like you voluntarily give me bill money every pay like we are partners, so geeze what are you tripping about now, I actually add it every pay myself and I only ask for what I give you not what you actually work for...so now u bitching about free money ARE U SERIOUS REALLY SWEETHEART*

91. On March 11, 2019, CHIDUME and CARTER engaged in the following text exchange:

Carter: *Excuse you...what the hell are you talking about! Look back at these texts, you started this shit with a random text about money that's none of your business as to what I spend it on, again...u acting like I gotta kiss your ass or that I'm begging you for money, let's not forget that this all started after we fucked you asked me to hook you up then it went from there...so u make the decision not me*

Carter: *Y ate you acting like U are doing me a favor and this started off as you asking for my assistance!*

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

93. For the pay period beginning on February 27, 2019 and ending on March 12, 2019, CHIDUME received an overpayment in the amount of \$1,471.54 for hours he did not work was not otherwise entitled to receive.

**Pay period beginning on July 31, 2019 an ending on August 13, 2019**

94. On March 22, 2019, CARTER texted CHIDUME:

Carter: *Gm...can u please make the deposit today, I truly hate asking you to do it, I feel like I'm begging you for something we already agreed on...and also we need to talk because Sarah is back and I need to no what you wanna do, I need to no exactly what u wanted regarding your sick and specifically the OT from this period on...*

95. On or about March 22, 2019, CHIDUME paid CARTER \$400.00 via check.

96. On March 27, 2019, CHIDUME and CARTER engaged in the following text exchange:

Carter: *I didn't touch your stuff, I no you are tiered of sharing with me...it's cool just keep in mind I never asked you to share something that you worked for..*

Chidume: *Lol... I don't get you sometimes. You scratched me and I scratched you. I never complained.*

Carter: *Never said u complained...stop running with stuff*

97. On August 3, 2019, CHIDUME and CARTER engaged in the following text exchange:

Chidume: *Goooooooood morning gggggg*

Chidume: *Please, Any OT at all this pay?*

Carter: *What's your w# again*

Carter: *How can I put ot on a check that's already in process*

Chidume: *I know, I meant from late reliefs and so on.1078417*

Carter: *You will be getting 3941.00 this pay*

Chidume: *Grrrrrh!*

Carter: *U need to also get that restriction lifted*

Chidume: *Thanks a whoooooole lot the help.*

Chidume: *Should see what it will after taxes. I will. You best believe that*

Carter: *I don't no about that u can see your stub on Monday...this is what you have to go thru when u get on the job injures so*

Chidume: 🤔🤔🤔🤔 *I know, I feel like slapping myself.*

Carter: *So u giving me some nail money lol*

98. On or about August 8, 2019, CHIDUME paid CARTER \$120.00 via check.

99. On August 14, 2019, CHIDUME and CARTER engaged in the following text exchange:

Carter: *Gm...I am getting myself together I will call you when I get in my car  
I didn't forget your time it's not too late lol*

Chidume: *Lol...no comments at this time.*

100. On August 15, 2019, CARTER texted CHIDUME:

Carter: *I told you they are watching us so I was willing to do some but u gotta do  
some too*

101. On August 15, 2019, CARTER altered CHIDUME's timecard, adding hours CHIDUME did not work to the pay period beginning on July 31, 2019 and ending on August 13, 2019.

102. For the pay period beginning on July 31, 2019 and ending on August 13, 2019, CHIDUME received an overpayment in the amount of \$2,041.70 for hours he did not work and was not otherwise entitled to receive.

**Pay period beginning on September 11, 2019 and ending on September 24, 2019**

103. On or about August 26, 2019, CHIDUME paid CARTER \$250.00 via check.

104. On August 29, 2019, CHIDUME and CARTER engaged in the following pertinent communication via text message:

Chidume: *Wow! I'm amazed. Then again nothing surprises me anymore which  
explains why I am. Almost 4 later and still no acknowledgement or word  
after the deposit? . I called, even sent you gift on your birthday. Mine came  
and went yesterday and you didn't even sneeze my way. It's all good.*



Carter: *Wowww...I totally apologize that definitely was not done on purpose. And then u reminding me of the deposit, we did discuss that and I thanked you. I will return that favor to you as soon as I get paid.....HAPPY BIRTHDAY!*

105. On September 2, 2019, CHIDUME and CARTER engaged in the following text exchange:

Chidume: *Thought you said you would return the favor.*

Carter: *Thought you said you would return the favor. ...I also gave you some hours so please don't start this stuff with me...look at what you had vs what I added, so nevertheless*

Chidume: *And I returned the favor*

Carter: *Ok I gave you and you gave me so you don't owe me and I don't owe you so what's the dam problem now...*

Chidume: *Thought we had a deal in the works...what happened?*

106. On September 11, 2019, CHIDUME texted CARTER:

Chidume: *Good morning sunshine.*

Chidume: *Am still here*

107. On September 12, 2019, CARTER altered CHIDUME's timecard, adding hours to the pay period beginning on August 28, 2019 and ending on September 10, 2019. Although altered September 12, 2019, CARTER did not enter the additional hours before the payroll period ended, causing the additional hours to be credited on to the pay period ending on September 24, 2019.

108. For the pay period beginning on September 11, 2019 and ending on September 24, 2019, CHIDUME received an overpayment in the amount of \$2,465.95 for hours he did not work and was not otherwise entitled to receive.

109. On or around October 3, 2019, CHIDUME paid CARTER \$300.00 via check.

110. On October 6, 2019, CHIDUME texted CARTER:

Chidume: *Well I can assist next ✓, if you hook me up.*

## **COUNT TWO**

### **CONSPIRACY TO COMMIT THEFT--SOLOMON**

SHANTIL CHETTA CARTER, did, between the dates of on or about April 2, 2018, through and including on or about August 9, 2019, conspire with GERALD LEON SOLOMON, JR., 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 TO COMMIT THEFT WITH SOLOMON**

**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 16<sup>th</sup>*

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: *16<sup>th</sup>*

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: *Hey, 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 and 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 March 13, 2019 and ending on March 26, 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 3, 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 March 13, 2019 and ending on March 26, 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, SOLMON 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**

#### **BRIBERY**

On or about June 10, 2018, SHANTIL CHETTA CARTER, did as a public employee, receive a bribe to influence the performance of her official duties as a Fiscal Technician I employed by the State of Maryland, to wit: did receive a \$100 payment from OKEZIE GERARD CHIDUME via check number 933 for CARTER to falsely inflate CHIDUME's timecard so that he would receive payroll payments for hours he did not work, in violation of CR 9-201 and against the peace, government, and dignity of the State.

*CR 9-201(b)*

*Maximum Penalty: \$25,000 and/or 12 years*

*CJIS 1-1683*

### **COUNT FOUR**

#### **BRIBERY**

On or about November 28, 2018, SHANTIL CHETTA CARTER, did, as a public employee, receive a bribe for the purpose of influencing the performance of her official duties as a Fiscal Technician I employed by the State of Maryland, to wit: did receive a \$350 payment from OKEZIE GERARD CHIDUME via check number 1113 for CARTER to falsely inflate CHIDUME's timecard so that he would receive payroll payments for hours he did not work in violation of CR 9-201 and against the peace, government, and dignity of the State.

*CR 9-201(b)*

*Maximum Penalty: \$25,000 and/or 12 years*

*CJIS 1-1683*

**COUNT FIVE**

**BRIBERY**

On or about December 13, 2018, SHANTIL CHETTA CARTER, did, as a public employee, receive a bribe for the purpose of influencing the performance of her official duties as a Fiscal Technician I employed by the State of Maryland, to wit: did receive a \$300 payment from OKEZIE GERARD CHIDUME via check number 1119 for CARTER to falsely inflate CHIDUME's timecard so that he would receive payroll payments for hours he did not work, in violation of CR 9-201 and against the peace, government, and dignity of the State.

*CR 9-201(b)*

*Maximum Penalty: \$25,000 and/or 12 years*

*CJIS 1-1683*

**COUNT SIX**

**BRIBERY**

On or about December 27, 2018, SHANTIL CHETTA CARTER, did, as a public employee, receive a bribe for the purpose of influencing the performance of her official duties as a Fiscal Technician I employed by the State of Maryland, to wit: did receive a \$400 payment from OKEZIE GERARD CHIDUME via check number 1085 for CARTER to falsely inflate CHIDUME's timecard so that he would receive payroll payments for hours he did not work, in violation of CR 9-201 and against the peace, government, and dignity of the State.

*CR 9-201(b)*

*Maximum Penalty: \$25,000 and/or 12 years*

*CJIS 1-1683*

## **COUNT SEVEN**

### **BRIBERY**

On or about January 10, 2019, SHANTIL CHETTA CARTER, did, as a public employee, receive a bribe for the purpose of influencing the performance of her official duties as a Fiscal Technician I employed by the State of Maryland, to wit: did receive a \$400 payment from OKEZIE GERARD CHIDUME via check number 1121 for CARTER to falsely inflate CHIDUME's timecard so that he would receive payroll payments for hours he did not work, in violation of CR 9-201 and against the peace, government, and dignity of the State.

*CR 9-201(b)*

*Maximum Penalty: \$25,000 and/or 12 years*

*CJIS 1-1683*

## **COUNT EIGHT**

### **BRIBERY**

On or about January 24, 2019, SHANTIL CHETTA CARTER, did, as a public employee, receive a bribe for the purpose of influencing the performance of her official duties as a Fiscal Technician I employed by the State of Maryland, to wit: did receive a \$400 payment from OKEZIE GERARD CHIDUME CARTER \$400 via check number 1122 for CARTER to falsely inflate CHIDUME's timecard so that he would receive payroll payments for hours he did not work, in violation of CR 9-201 and against the peace, government, and dignity of the State.

*CR 9-201(b)*

*Maximum Penalty: \$25,000 and/or 12 years*

*CJIS 1-1683*

## **COUNT NINE**

### **BRIBERY**

On or about February 8, 2019, SHANTIL CHETTA CARTER, did, as a public employee, receive a bribe for the purpose of influencing the performance of her official duties as a Fiscal Technician I employed by the State of Maryland, to wit: did receive a \$500 payment from OKEZIE GERARD CHIDUME via check number 1125 for CARTER to falsely inflate CHIDUME's timecard so that he would receive payroll payments for hours he did not work, in violation of CR 9-201 and against the peace, government, and dignity of the State.

*CR 9-201(b)*

*Maximum Penalty: \$25,000 and/or 12 years*

*CJIS 1-1683*

## **COUNT TEN**

### **BRIBERY**

On or about February 25, 2019, SHANTIL CHETTA CARTER, did, as a public employee, receive a bribe for the purpose of influencing the performance of her official duties as a Fiscal Technician I employed by the State of Maryland, to wit: did receive a \$240 payment from OKEZIE GERARD CHIDUME via personal money order number 501995193-3 for CARTER to falsely inflate CHIDUME's timecard so that he would receive payroll payments for hours he did not work, in violation of CR 9-201 and against the peace, government, and dignity of the State.

*CR 9-201(b)*

*Maximum Penalty: \$25,000 and/or 12 years*

*CJIS 1-1683*

## **COUNT ELEVEN**

### **BRIBERY**

On or about March 5, 2019, SHANTIL CHETTA CARTER, did, as a public employee, receive a bribe for the purpose of influencing the performance of her official duties as a Fiscal Technician I employed by the State of Maryland, to wit: did receive a \$400 payment from OKEZIE GERARD CHIDUME via check number 1075 for CARTER to falsely inflate CHIDUME's timecard so that he would receive payroll payments for hours he did not work, in violation of CR 9-201 and against the peace, government, and dignity of the State.

*CR 9-201(b)*  
*Maximum Penalty: \$25,000 and/or 12 years*  
*CJIS 1-1683*

## **COUNT TWELVE**

### **BRIBERY**

On or about March 22, 2019, SHANTIL CHETTA CARTER, did, as a public employee, receive a bribe for the purpose of influencing the performance of her official duties as a Fiscal Technician I employed by the State of Maryland, to wit: did receive a \$400 payment from OKEZIE GERARD CHIDUME via check number 1078 for CARTER to falsely inflate CHIDUME's timecard so that he would receive payroll payments for hours he did not work in violation of CR 9-201, and against the peace, government, and dignity of the State.

*CR 9-201(b)*  
*Maximum Penalty: \$25,000 and/or 12 years*  
*CJIS 1-1683*

### **COUNT THIRTEEN**

#### **BRIBERY**

On or about August 8, 2019, SHANTIL CHETTA CARTER, did, as a public employee, receive a bribe for the purpose of influencing the performance of her official duties as a Fiscal Technician I employed by the State of Maryland, to wit: did receive a \$120 payment from OKEZIE GERARD CHIDUME via check number 1017 for CARTER to falsely inflate CHIDUME's timecard so that he would receive payroll payments for hours he did not work, in violation of CR 9-201 and against the peace, government, and dignity of the State.

*CR 9-201(b)*

*Maximum Penalty: \$25,000 and/or 12 years*

*CJIS 1-1683*

### **COUNT FOURTEEN**

#### **BRIBERY**

On or about August 26, 2019, SHANTIL CHETTA CARTER, did, as a public employee, receive a bribe for the purpose of influencing the performance of her official duties as a Fiscal Technician I employed by the State of Maryland, to wit: did receive a \$250 payment from OKEZIE GERARD CHIDUME via check number 1022 for CARTER to falsely inflate CHIDUME's timecard so that he would receive payroll payments for hours he did not work, in violation of CR 9-201 and against the peace, government, and dignity of the State.

*CR 9-201(b)*

*Maximum Penalty: \$25,000 and/or 12 years*

*CJIS 1-1683*



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

Lindsay E. Bird

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