

Statement of Facts

6. The State and the Defendant understand, agree, and stipulate to the following Statement of Facts, which the State would prove beyond a reasonable doubt had this case proceeded to trial:

On or about September 14, 2019, Edward Estes was the Mayor of The City of Glenarden, Prince Georges County, Maryland, which made him a public official. In his capacity as Mayor, Mr. Estes had a meeting with two other individuals, Karen Shoultz and Kenneth Jones, regarding a personnel issue concerning a City of Glenarden employee. Mr. Estes had his MacBook laptop computer open and was recording the meeting. Karen Shoultz and Kenneth Jones did not consent to being recorded by Mr. Estes at the meeting and at no point did Mr. Estes advise them that the meeting was being recorded. Recording conversations without the consent of all parties is unlawful in Maryland. Subsequently, at a public meeting, Mr. Estes announced to members of the City Council and others that he had recorded the conversation with Karen Shoultz and Kenneth Jones.

If called to testify Karen Shoultz and Kenneth Jones would identify Mr. Estes as the individual who recorded them without their consent, and would identify Mr. Estes' voice and their voices on the recording. All events occurred in Prince Georges County, Maryland.