

STATE OF MARYLAND

*** IN THE**

VS

*** CIRCUIT COURT**

ANDREW BRADSHAW

*** FOR DORCHESTER COUNTY**

115 Glenburn Avenue

*** CASE NO.:**

Cambridge, MD 21613

CRIMINAL INFORMATION

THE STATE PROSECUTOR for the State of Maryland, informs and charges, ANDREW BRADSHAW with having committed the following offenses in Dorchester County, Maryland.

I. INTRODUCTION AND BACKGROUND

At all times relevant to this Information:

1. The City of Cambridge is an incorporated municipality situated in Dorchester County, Maryland.
2. Andrew Bradshaw (“BRADSHAW”), born in 1989, is the elected Mayor of the City of Cambridge.
3. Reddit.com (“REDDIT”) is an online forum where people can create communities (known as “subreddits”) to communicate. Each subreddit has its own page, subject matter, users, and volunteer moderators (also known as “mods”). Users can share content by publishing stories, links, and/or media (called “posts”) to a subreddit, and other users can comment on those posts. Users can also “upvote” or “downvote” comments and/or posts. The number of upvotes and downvotes a post receives helps determine its position within the subreddit.
4. On or about May 14, 2021, law enforcement was contacted by a female complainant born in 1995 (“VICTIM-1”). VICTIM-1 advised law enforcement that she discovered nude photographs of herself posted to the public website REDDIT.

5. VICTIM-1 advised law enforcement that she was outside of the State of Maryland when she learned that her nude photographs were posted to REDDIT.
6. VICTIM-1 advised law enforcement that the photographs were posted without her knowledge or consent.
7. VICTIM-1 advised that she transmitted the posted photographs only to one other person, Andrew BRADSHAW, that the photographs were sent when she and BRADSHAW were in an intimate relationship, and that she did not provide BRADSHAW with consent to re-distribute the photographs.
8. VICTIM-1 advised law enforcement that she is no longer romantically involved with BRADSHAW.
9. Accounts associated with VICTIM-1's picture ("TARGET REDDIT ACCOUNTS") were utilized to post photographs of VICTIM-1's face and intimate parts to public REDDIT forums. Each of these accounts has a public username consisting of permutations of VICTIM-1's legal name and/or date of birth.
10. Some REDDIT forums where the photographs of VICTIM-1 include subreddits named "HumiliatingComments", "DegradeThisPig", "DegradedCaptions", "Slut", and "needysluts". Additional photographs of VICTIM-1 were posted in subreddits specifically related to "raceplay" with racial slurs in several of the posting titles.
11. The TARGET REDDIT ACCOUNTS were utilized to post photographs of VICTIM-1's face and intimate parts from internet protocol ("IP") address 69.251.0.252 ("IP ADDRESS"). This IP ADDRESS, at the dates and times of the activity cited herein, provided internet service to 115 Glenburn Avenue, Cambridge, MD 21613.

12. Maryland Department of Taxation and Assessment records show that 115 Glenburn Avenue, Cambridge, MD 21613 is owned by BRADSHAW.

II. RACEPLAY SUBREDDIT POSTS

COUNT 1 – DISTRIBUTE INTIMATE SEX IMAGE

On or about May 20, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Fucked a [redacted] for the 1st time last night- I'm still smiling this morning from the orgasms he gave me”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

*Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326*

COUNT 2- DISTRIBUTE INTIMATE SEX IMAGE

On or about May 20, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “The kind of white girl [redacted] love to nut on”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809

Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 3- DISTRIBUTE INTIMATE SEX IMAGE

On or about May 3, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Ready to try my first ever [redacted] dick”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 4- DISTRIBUTE INTIMATE SEX IMAGE

On or about May 3, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Ready to try [redacted] dick for the 1st time”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 5- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 19, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Ready to put a [redacted] dick between these titties for the first time ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 6- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 19, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “The kind of body black men love”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 7- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 19, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Ready to ride my first [redacted]

cock”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 8- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 19, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “24 yo white girl looking for first black dick”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 9- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 9, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “chubby white girl looking for a [redacted] daddy to message with”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable

expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

III. NEEDYSLUTS SUBREDDIT POSTS

COUNT 10- DISTRIBUTE INTIMATE SEX IMAGE

On or about May 5, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “It’s been a while, need a load of cum to wear on these fat, pail titties ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 11- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 25, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “[oc] Wishing I had a guy to get on top of this morning to bounce on his dick and then wear his cum on my titties”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in

violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 12- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 12, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Tell me how you'd use me ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 13- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 9, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “It's raining, time to masturbate all day and post pics of my titties on Reddit ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809

Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 14- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 6, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “The look as you cum inside me after 5 minutes when you said you could go 20 ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 15- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 3, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Laying here needing a cock to put between these titties ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

IV. SLUT SUBREDDIT POSTS

COUNT 16- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 25, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Wishing I had a guy to get on top of this morning to bounce on his dick and then wear his cum on my titties”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809

Maximum Penalty: 2 years/\$5,000

CJIS Code 1-1326

COUNT 17- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 13, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “The view as you're about to slide your cock between my titties”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809

Maximum Penalty: 2 years/\$5,000

CJIS Code 1-1326

COUNT 18- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 12, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Tell me how you'd use me ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 19- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 8, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Good morning, would you like breakfast and a titfuck??? ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 20- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 6, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “The look as you cum inside me after

5 minutes when you said you could go 20 ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 21- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 4, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “He is risen, but I’d like to make something rise In your pants ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

V. DEGRADED CAPTIONS SUBREDDIT POSTS

COUNT 22- DISTRIBUTE INTIMATE SEX IMAGE

On or about May 4, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “I’ve been posting my fat titties on reddit to get attention from guys I don’t know and will never meet”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard

as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 23- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 19, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Dad sent me to Catholic school, now I post pics of my titties on Reddit for guys to jerk off to me ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 24- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 11, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Thoughts on these big titties and soft, chubby body?”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 25- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 9, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Tell me all about how worthless my chubby body is”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

VI. GONEWILDCHUBBY SUBREDDIT POSTS

COUNT 26- DISTRIBUTE INTIMATE SEX IMAGE

On or about May 7, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “A good day to get some cum on my titties ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000

COUNT 27- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 24, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “My round belly is peeking into this pic with my round titties :)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

*Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326*

COUNT 28- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 13, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “The view as you're about to slide your cock between my titties”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

*Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326*

COUNT 29- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 3, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Your view while that cock erupts deep inside me ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

*Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326*

VII. DADWOULDBEPROUD SUBREDDIT POSTS

COUNT 30- DISTRIBUTE INTIMATE SEX IMAGE

On or about May 3, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Dad sent me to Catholic school, now I’m on here helping guys nut ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

*Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326*

COUNT 31- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 30, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “He paid for Catholic school, now I post my tits on reddit so guys jerk off to me”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 32- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 4, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “He is risen, but I'd like to make something rise on your pants ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

VIII. HUMILIATING COMMENTS SUBREDDIT POSTS

COUNT 33- DISTRIBUTE INTIMATE SEX IMAGE

On or about May 4, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “I've been posting my titties on reddit to get attention and improve my self-esteem- use me and do yoour worst”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809

Maximum Penalty: 2 years/\$5,000

CJIS Code 1-1326

COUNT 34- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 11, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Posting my fat tits online for guys to jerk themselves off makes me feel better about myself”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809

Maximum Penalty: 2 years/\$5,000

CJIS Code 1-1326

COUNT 35- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 9, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “My titties are big, but so is my tummy, and I have so many self-esteem issues because of it”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

IX. DEGRADE THIS PIG SUBREDDIT POSTS

COUNT 36- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 11, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Use my fat titties however you want ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 37- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 9, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “I have no self-esteem, and just want to be covered in cum to know my fat body has a purpose”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

X. FATGIRLSGONEWILD SUBREDDIT POSTS

COUNT 38- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 8, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Ready for bed, or ready for dick... ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 39- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 6, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “The look as you cum inside me after 5 minutes when you said you could go 20 ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

XI. MISOGYNISTICLIFE SUBREDDIT POSTS

COUNT 40- DISTRIBUTE INTIMATE SEX IMAGE

On or about May 4, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “I've been posting pics of my titties on reddit to get used by guys as their personal online slut”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 41- DISTRIBUTE INTIMATE SEX IMAGE

On or about May 4, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “I've been posting pics of my titties on reddit to get used by guys as their personal online slut”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

XII. CHUBBY SUBREDDIT POSTS

COUNT 42- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 15, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Ready to ride you”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

COUNT 43- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 11, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “The picture is blurry, but my titties look spectacular”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

*Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326*

XIII. CUMONMYPICS SUBREDDIT POST

COUNT 44- DISTRIBUTE INTIMATE SEX IMAGE

On or about May 3, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Give me that load you've been saving up ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

*Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326*

XIV. LEWDS SUBREDDIT POST

COUNT 45- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 30, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Don't let the innocent look fool you, I'm here to make you cum ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

XV. NUDEROAST SUBREDDIT POST

COUNT 46- DISTRIBUTE INTIMATE SEX IMAGE

On or about May 4, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “I post my titties on reddit to get attention and to get off”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

XVI. HUMONGOSAURUSTITS SUBREDDIT POST

COUNT 47- DISTRIBUTE INTIMATE SEX IMAGE

On or about May 12, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Every morning, I get off to the thought of dozens of guys jerking off and pumping out their load to pics of my fat titties <3”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809

Maximum Penalty: 2 years/\$5,000

CJIS Code 1-1326

XVII. COCKTRIBUTES SUBREDDIT POST

COUNT 48- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 4, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “I'm on my back waiting for you to spray me ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809

Maximum Penalty: 2 years/\$5,000

CJIS Code 1-1326

XVIII. ALLABOUTBOOBS SUBREDDIT POST

COUNT 49- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 3, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “My titties are a perfect place to deposit your seed ;)”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

XIX. BIGBELLIES SUBREDDIT POST

COUNT 50- DISTRIBUTE INTIMATE SEX IMAGE

On or about April 5, 2021, at Dorchester County, Maryland, ANDREW BRADSHAW, did knowingly distribute a visual representation (with caption “Would you rather cum in me, on my titties, on my tummy, or on my face???”) of Victim 1, that displays said person’s intimate parts exposed, with the intent to harm said person, with reckless disregard as to whether said person consented to the distribution and under circumstances in which the other person had a reasonable expectation that the image would remain private, in violation of §3-809 of the Criminal Law Article and against the peace, government and dignity of the State.

Distribute Intimate Sex Image, Criminal Law Article §3-809
Maximum Penalty: 2 years/\$5,000
CJIS Code 1-1326

CHARLTON T. HOWARD, III
MARYLAND STATE PROSECUTOR

By:



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TO THE PERSON CHARGED:

1. This paper charges you with committing a crime.
2. If you have been arrested and remain in custody, you have the right to have a judicial officer decide whether you should be released from jail until your trial.
3. If you have been served with a citation or summons directing you to appear before a judicial officer for a preliminary inquiry at a date and time designated or within five days of service if no time is designated, a judicial officer will advise you of your rights, the charges against you, and penalties. The preliminary inquiry will be cancelled if a lawyer has entered an appearance to represent you.
4. You have the right to have a lawyer.
5. A lawyer can be helpful to you by:
 - (A) explaining the charges in this paper;
 - (B) telling you the possible penalties;
 - (C) explaining any potential collateral consequences of a conviction, including immigration consequences;
 - (D) helping you at trial;
 - (E) helping you protect your constitutional rights; and
 - (F) helping you to get a fair penalty if convicted.
6. Even if you plan to plead guilty, a lawyer can be helpful.
7. If you are eligible, the Public Defender or a court-appointed attorney will represent you at any initial appearance before a judicial officer and at any proceeding under Rule 4-216.2 to review an order of a District Court commissioner regarding pretrial release. If you want a lawyer for any further proceeding, including trial, but do not have the money to hire one, the Public Defender may provide a lawyer for you. To apply for Public Defender representation, contact a District Court commissioner.
8. If you want a lawyer but you cannot get one and the Public Defender will not provide one for you, contact the court clerk as soon as possible.
9. **DO NOT WAIT UNTIL THE DATE OF YOUR TRIAL TO GET A LAWYER.** If you do not have a lawyer before the trial date, you may have to go to trial without one.

Defendant

Date/Time