

***State of Maryland,***

*City of Baltimore, to wit:*

**IN THE CIRCUIT COURT FOR BALTIMORE CITY**

**The State of Maryland**

**-vs-**

**ADAM LANE CHAUDRY**

**Defendant**

Complainant: **S/A John Sieracki,  
Maryland Office of the State Prosecutor**

**INDICTMENT**

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT:

**INTRODUCTION AND BACKGROUND**

At all times relevant to this Indictment:

1. Adam Lane CHAUDRY ("CHAUDRY") served as an Assistant State's Attorney in the Baltimore City State's Attorney's Office in the Office's Homicide Division.
2. CHAUDRY began his service with the Baltimore City State's Attorney's Office as an Assistant State's Attorney on June 1, 2009 and was administered an oath on or about 10:00 AM by the Clerk of the Court on that date.
3. On or about September 2015, CHAUDRY joined the Homicide Division of the Baltimore City State's Attorney's Office.
4. The Homicide Division of the Baltimore City State's Attorney's Office routinely requests grand jury and trial subpoenas for information related to official investigations and prosecutions.  

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As a member of the Homicide Division of the Baltimore City State's Attorney's Office, CHAUDRY would routinely obtain or request grand jury and trial subpoenas.
5. On or about May 2005, CHAUDRY became engaged in a romantic relationship with VICTIM 1. VICTIM 1 and CHAUDRY terminated that relationship on or about January 2018.

6. VICTIM 1 was never the target of, nor involved in, an investigation or prosecution conducted by the Baltimore City State's Attorney's Office.

7. On or about August 2017, CHAUDRY became engaged in a romantic relationship with VICTIM 2. VICTIM 2 and CHAUDRY terminated that relationship on or about September 2020.

8. VICTIM 2 was never the target of, nor involved in, an investigation or prosecution conducted by the Baltimore City State's Attorney's Office.

9. VICTIM 1 had telephonic contact with VICTIM 3, VICTIM 4, and VICTIM 5. VICTIM 3, VICTIM 4, and VICTIM 5 were friends with VICTIM 1 and continued communication with VICTIM 1 after CHAUDRY and VICTIM 1 terminated their relationship.

10. VICTIM 3 was never the target of, nor involved in, an investigation or prosecution conducted by the Baltimore City State's Attorney's Office.

11. VICTIM 4 was never the target of, nor involved in, an investigation or prosecution conducted by the Baltimore City State's Attorney's Office.

12. VICTIM 5 was never the target of, nor involved in, an investigation or prosecution conducted by the Baltimore City State's Attorney's Office.

### **SUBPOENAS**

#### **COUNT 1 - MISCONDUCT IN OFFICE**

13. On or about July 30, 2019, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the

Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 2 - MISCONDUCT IN OFFICE**

14. On or about July 30, 2019, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 3 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 3 - MISCONDUCT IN OFFICE**

15. On or about August 20, 2019, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 4 - MISCONDUCT IN OFFICE**

16. On or about August 20, 2019, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 3 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 5- MISCONDUCT IN OFFICE**

17. On or about October 1, 2019, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 6 - MISCONDUCT IN OFFICE**

18. On or about October 1, 2019, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the

Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 3 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 7 - MISCONDUCT IN OFFICE**

19. On or about October 15, 2019, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 8 - MISCONDUCT IN OFFICE**

20. On or about October 15, 2019, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 3 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 9 - MISCONDUCT IN OFFICE**

21. On or about November 15, 2019, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 10 - MISCONDUCT IN OFFICE**

22. On or about November 15, 2019, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 3 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 11 - MISCONDUCT IN OFFICE**

23. On or about December 23, 2019, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the

Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 12 - MISCONDUCT IN OFFICE**

24. On or about December 23, 2019, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 3 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 13 - MISCONDUCT IN OFFICE**

25. On or about December 27, 2019, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*



**COUNT 14 - MISCONDUCT IN OFFICE**

26. On or about December 27, 2019, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 3 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 15 - MISCONDUCT IN OFFICE**

27. On or about January 21, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 16- MISCONDUCT IN OFFICE**

28. On or about January 21, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the

Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 3 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 17 - MISCONDUCT IN OFFICE**

29. On or about January 21, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 4 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 18 - MISCONDUCT IN OFFICE**

30. On or about January 21, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 5 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 19 - MISCONDUCT IN OFFICE**

31. On or about January 27, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 20 - MISCONDUCT IN OFFICE**

32. On or about January 27, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 3 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 21 - MISCONDUCT IN OFFICE**

33. On or about February 18, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the

Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 22 - MISCONDUCT IN OFFICE**

34. On or about February 18, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 3 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 23 - MISCONDUCT IN OFFICE**

35. On or about February 18, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 4 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 24 - MISCONDUCT IN OFFICE**

36. On or about April 21, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 25 - MISCONDUCT IN OFFICE**

37. On or about April 21, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 3 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 26 - MISCONDUCT IN OFFICE**

38. On or about April 21, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the

Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 5 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 27 - MISCONDUCT IN OFFICE**

39. On or about May 14, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 28 - MISCONDUCT IN OFFICE**

40. On or about May 29, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 29 - MISCONDUCT IN OFFICE**

41. On or about June 30, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 30 - MISCONDUCT IN OFFICE**

42. On or about July 24, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 31 - MISCONDUCT IN OFFICE**

43. On or about August 12, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the

Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645*

*Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 32 - MISCONDUCT IN OFFICE**

44. On or about September 2, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 33 - MISCONDUCT IN OFFICE**

45. On or about September 22, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*



**COUNT 34 - MISCONDUCT IN OFFICE**

46. On or about October 14, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 35 - MISCONDUCT IN OFFICE**

47. On or about December 8, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing jail calls made and received by VICTIM 2's relative, who was incarcerated in Anne Arundel County Detention Center, for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 36 - MISCONDUCT IN OFFICE**

48. On December 21, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and

intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing visitor and call logs for a relative of VICTIM 2 incarcerated in Anne Arundel County Detention Center for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

### **COUNT 37 - MISCONDUCT IN OFFICE**

49. On or about January 20, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 2 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

### **COUNT 38 - MISCONDUCT IN OFFICE**

50. On or about January 20, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the

Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 39 - MISCONDUCT IN OFFICE**

51. On or about January 25, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 3 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 40 - MISCONDUCT IN OFFICE**

52. On or about February 8, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 2 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 41 - MISCONDUCT IN OFFICE**

53. On or about February 8, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 42 - MISCONDUCT IN OFFICE**

54. On or about February 8, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 3 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 43 - MISCONDUCT IN OFFICE**

55. On or about February 22, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and

intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 2 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 44 - MISCONDUCT IN OFFICE**

56. On or about February 24, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, sending a letter to the Anne Arundel County Police Department on Office of the State's Attorney for Baltimore City Letterhead requesting a CAD Report and 911 recording for a call for service made by VICTIM 2, stating in the letter that the request "is pertinent to a legitimate law enforcement inquiry" when the information was for his personal use.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**COUNT 45 - MISCONDUCT IN OFFICE**

57. On or about March 19, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the

Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 2 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 46 - MISCONDUCT IN OFFICE**

58. On or about March 19, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 47 - MISCONDUCT IN OFFICE**

59. On or about April 12, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 2 for his personal use, against the peace, government and dignity of the State.

*Common Law*

*CJIS Code 2-0645 Misconduct in Office*

*Penalty: Anything not cruel and unusual*

**COUNT 48 - MISCONDUCT IN OFFICE**

60. On or about April 12, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY, in violation and perversion of his duties as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while taking advantage of his position as an Assistant State's Attorney for the Baltimore City State's Attorney's Office, subpoenaing telephone records of VICTIM 1 for his personal use, against the peace, government and dignity of the State.

*Common Law*  
*CJIS Code 2-0645 Misconduct in Office*  
*Penalty: Anything not cruel and unusual*

**MISREPRESENTATION TO PHONE COMPANIES**

61. The Grand Jury incorporates paragraphs 1- 12 of this Indictment as though fully set forth herein.

62. Verizon Wireless is an American wireless network operator.

63. Verizon Wireless's policies related to providing phone records are as follows:

64. Verizon Wireless charges a minimum of \$75 for each phone record(s) not obtained for a law enforcement purpose.

65. AT&T is an American wireless network operator.

66. AT&T's policies related to providing phone records are as follows:

67. AT&T charges a \$45 processing fee for each Subpoena Duces Tecum (SDT) received, and a \$25 search fee for each individual number on the SDT, for each record not obtained for a law enforcement purpose.

**COUNT 49- THEFT SCHEME \$1,500-\$25,000**

68. ADAM L. CHAUDRY, did, between the dates of on or about February 22, 2019, through and including April 12, 2021, pursuant to one scheme and continuing course of conduct, steal 31 phone records from Verizon Wireless, having the value of \$2,325, at least \$1,500 but less than \$25,000, in the violation of CR §7-104 of the Annotated Code of Maryland.

*CJIS Code 1-1136  
CR §7-104(b)  
Penalty: \$10,000 and/or 5 years*

**COUNT 50 - THEFT SCHEME \$1,500-\$25,000**

69. ADAM L. CHAUDRY, did, between the dates of on or about January 3, 2019, through and including April 12, 2021, pursuant to one scheme and continuing course of conduct, steal 33 phone records from AT&T, having the value of \$2,310, at least \$1,500 but less than \$25,000, in the violation of CR §7-104 of the Annotated Code of Maryland.

*CJIS Code 1-1136  
CR §7-104(b)  
Penalty: \$10,000 and/or 5 years*

**COUNT 51 - Obtaining Telephone Records Without Authorization**

70. On or about August 12, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, did knowingly obtain a telephone record without the authorization of the customer to whom the record pertains, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, without obtaining the authorization of VICTIM 1.

*CJIS Code 1\_0593  
CR §7-304 (c)(1)  
Penalty: 2 years and/or \$2,000*



**COUNT 52 - Obtaining Telephone Records Without Authorization**

71. On or about August 12, 2020, at Baltimore City, Maryland ADAM L. CHAUDRY, did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, the subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 1 and the records were not for official use.

*CJIS Code 1\_0593  
CR §7-304 (c)(1)  
Penalty: 2 years and/or \$2,000*

**COUNT 53 - Obtaining Telephone Records Without Authorization**

72. On or about September 2, 2020, at Baltimore City, Maryland, at Baltimore City, Maryland, ADAM L. CHAUDRY, did knowingly obtain a telephone record without the authorization of the customer to whom the record pertains, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, without obtaining the authorization of VICTIM 1.

*CJIS Code 1\_0593  
CR §7-304 (c)(1)  
Penalty: 2 years and/or \$2,000*

**COUNT 54 - Obtaining Telephone Records Without Authorization**

73. On or about September 2, 2020 at Baltimore City, Maryland ADAM L. CHAUDRY, did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, the

subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 1 and the records were not for official use

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 55 - Obtaining Telephone Records Without Authorization**

74. On or about September 22, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, did knowingly obtain a telephone record without the authorization of the customer to whom the record pertains, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, without obtaining the authorization of VICTIM 1.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 56 - Obtaining Telephone Records Without Authorization**

75. On or about September 22, 2020 at Baltimore City, Maryland ADAM L. CHAUDRY, did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, the subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 1 and the records were not for official use.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 57 - Obtaining Telephone Records without Authorization**

76. On or about October 14, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record without the authorization of the customer to whom the record

pertains, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, without obtaining the authorization of VICTIM 1.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 58 - Obtaining Telephone Records without Authorization**

77. On or about October 14, 2020, at Baltimore City, Maryland ADAM L. CHAUDRY, did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, the subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 1 and the records were not for official use.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 59 - Obtaining Telephone Records without Authorization**

78. On or about January 20, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record without the authorization of the customer to whom the record pertains, to wit: issued a subpoena to Verizon Wireless compelling them to produce records for VICTIM 2's phone number, without obtaining the authorization of VICTIM 2.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

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**COUNT 60 - Obtaining Telephone Records without Authorization**

79. On or about January 20, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to Verizon Wireless compelling them to produce records for VICTIM 2's phone number,

the subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 2 and the records were not for official use.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 61 - Obtaining Telephone Records Without Authorization**

80. On or about January 20, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, ADAM L. CHAUDRY did knowingly obtain a telephone record without the authorization of the customer to whom the record pertains, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, without obtaining the authorization of VICTIM 1.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 62 - Obtaining Telephone Records Without Authorization**

81. On or about January 20, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, the subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 1 and the records were not for official use.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 63 - Obtaining Telephone Records Without Authorization**

82. On or about January 25, 2020, Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record without the authorization of the customer to whom the record

pertains, to wit: issued a subpoena to Verizon Wireless compelling them to produce records for VICTIM 3's phone number, without obtaining the authorization of VICTIM 3.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 64 - Obtaining Telephone Records Without Authorization**

83. On or about January 25, 2020, Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to Verizon Wireless compelling them to produce records for VICTIM 3's phone number, the subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 3 and the records were not for official use.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 65 - Obtaining Telephone Records Without Authorization**

84. On or about February 8, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record without the authorization of the customer to whom the record pertains, to wit: issued a subpoena to Verizon Wireless compelling them to produce records for VICTIM 2's phone number, without obtaining the authorization of VICTIM 2.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 66 - Obtaining Telephone Records Without Authorization**

85. On or about February 8, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to Verizon Wireless compelling them to produce records for VICTIM 2's phone number,

the subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 2 and the records were not for official use.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 67 - Obtaining Telephone Records Without Authorization**

86. On or about February 8, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record without the authorization of the customer to whom the record pertains, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, without obtaining the authorization of VICTIM 1.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 68 - Obtaining Telephone Records Without Authorization**

87. On or about February 8, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, on a subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 1 and the records were not for official use.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 69 - Obtaining Telephone Records Without Authorization**

88. On or about February 8, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record without the authorization of the customer to whom the record

pertains, to wit: issued a subpoena to Verizon Wireless compelling them to produce records for VICTIM 3's phone number, without obtaining the authorization of VICTIM 3.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 70 - Obtaining Telephone Records Without Authorization**

89. On or about February 8, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to Verizon Wireless compelling them to produce records for VICTIM 3's phone number, the subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 3 and the records were not for official use.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 71 - Obtaining Telephone Records Without Authorization**

90. On or about February 22, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY, did knowingly obtain a telephone record without the authorization of the customer to whom the record pertains, to wit: issued a subpoena to Verizon Wireless compelling them to produce records for VICTIM 2's phone number, without obtaining the authorization of VICTIM 2.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 72 - Obtaining Telephone Records Without Authorization**

91. On or about February 22, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to Verizon Wireless compelling them to produce records for VICTIM 2's phone number,

the subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 2 and the records were not for official use.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 73 - Obtaining Telephone Records Without Authorization**

92. On or about March 19, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record without the authorization of the customer to whom the record pertains, to wit: issued a subpoena to Verizon Wireless compelling them to produce records for VICTIM 2's phone number, without obtaining the authorization of VICTIM 2.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 74 - Obtaining Telephone Records Without Authorization**

93. On or about March 19, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to Verizon Wireless compelling them to produce records for VICTIM 2's phone number, the subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 2 and the records were not for official use.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 75 - Obtaining Telephone Records Without Authorization**

94. On or about March 19, 2020, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record without the authorization of the customer to whom the record



pertains, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, without obtaining the authorization of VICTIM 1.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 76 - Obtaining Telephone Records Without Authorization**

95. On or about March 19, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, the subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 1 and the records were not for official use.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 77 - Obtaining Telephone Records Without Authorization**

96. On or about April 12, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY, did knowingly obtain a telephone record without the authorization of the customer to whom the record pertains, to wit: issued a subpoena to Verizon Wireless compelling them to produce records for VICTIM 2's phone number, without obtaining the authorization of VICTIM 2.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 78 - Obtaining Telephone Records Without Authorization**

97. On or about April 12, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to Verizon Wireless compelling them to produce records for VICTIM 2's phone number,

the subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 2 and the records were not for official use.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 79 - Obtaining Telephone Records Without Authorization**

98. On or about April 12, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record without the authorization of the customer to whom the record pertains, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, without obtaining the authorization of VICTIM 1.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**COUNT 80 - Obtaining Telephone Records Without Authorization**

99. On or about April 12, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY did knowingly obtain a telephone record by fraudulent, deceptive, or false means, to wit: issued a subpoena to AT&T compelling them to produce records for VICTIM 1's phone number, the subpoena stating it was for "IN RE SPECIAL INVESTIGATION", when in fact there was no official investigation involving VICTIM 1 and the records were not for official use.

*CJIS Code 1\_0593*  
*CR §7-304 (c)(1)*  
*Penalty: 2 years and/or \$2,000*

**ADDITIONAL USE OF PERSONAL INFORMATION- VICTIM 1**

100. The Grand Jury incorporates paragraphs 1-12 and 61-67 of this Indictment as though fully set forth herein.

101. On or about January 2018, VICTIM 1 terminated her romantic relationship with CHAUDRY. She conveyed to CHAUDRY that she did not want to have any communication with him. CHAUDRY then engaged in a course of conduct including, but not limited to, behavior listed in paragraphs 101-113 in addition to what has been incorporated above.

102. From January 3, 2019 until April 12, 2021 CHAUDRY issued subpoenas for VICTIM 1's phone records thirty-three (33) times.

103. From March 12, 2019, until April 12, 2021, CHAUDRY issued subpoenas for VICTIM 1's contacts, including VICTIM 3, VICTIM 4, and VICTIM 5, twenty-five (25) times.

104. On January 8, 2019, CHAUDRY sent VICTIM 1 flowers to her work address.

105. On February 14, 2019, CHAUDRY sent VICTIM 1 flowers to her work address.

106. On March 4, 2019, VICTIM 1 responded to an email from CHAUDRY in which CHAUDRY asked if the two could talk. VICTIM 1 clearly and unambiguously stated: "It has been over a year now and I need you to move on. I was hoping that by ignoring the texts, calls, and flowers, you would understand how I feel, but now I will make it very clear...; Please do not send me any more flowers or anything else...; It makes me uncomfortable...; I asked you not to send anything to my mom, and you decided to send a card and flowers. It is too much and it needs to stop...; Please do not try to look through my Instagram pictures...; There is no future for us...; Please do not stop by my house or try to "run" into me anywhere else...; You need to let me go...; I need you to stop trying to contact me and send me gifts."

107. On December 7, 2020, CHAUDRY sent VICTIM 1 flowers to her home address.

108. On January 8, 2021, CHAUDRY sent VICTIM 1 flowers to her home address.

109. On February 22, 2019, CHAUDRY sent VICTIM 1's mother flowers to VICTIM 1's mother's address.

110. On March 21, 2019, CHAUDRY via email sent a request to an investigator at the Baltimore City State's Attorney's Office to do an information work-up of VICTIM 1 and VICTIM 3, including Maryland Vehicle Administration (MVA) records and digital images.

111. On or about December 2018 through March 2019, VICTIM 1 engaged in communications and trips with VICTIM 3, VICTIM 4, and VICTIM 5 that required hotel stays. On March 26, 2019, CHAUDRY, using his Baltimore City State's Attorney email address, exchanged emails with an employee of a hotel that VICTIM 1 had called for reservations. CHAUDRY's emails referenced a previous conversation between CHAUDRY and the hotel employee in which CHAUDRY provided several names including VICTIM 1.

112. In an email addressed to CHAUDRY, the hotel employee stated, "Hello Mr. Chaudry. Upon review of the three names you supplied, I was only able to find stays for [VICTIM 1] from October 1, 2018 through March 22, 2019." The email stated VICTIM 1's specific dates of stay.

113. CHAUDRY responded to the email from his Baltimore City State's Attorney issued email address on the same day, "Per our conversation, I have taken the liberty of scanning & attaching with this correspondence the MVA digital image(s). the [sic] 2<sup>nd</sup> Vehicle [sic] in question I wish to verify is a [CHAUDRY provided a description of a vehicle operated by VICTIM 3]."

#### **COUNT 81 - STALKING**

114. From on or about January 3, 2019, until April 12, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY did stalk VICTIM 1.

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*CJIS CODE 1\_6525  
CR §3-802(c)  
Penalty: 5 years and/or \$5,000*

**COUNT 82 - HARASSMENT**

115. From on or about January 3, 2019, until April 12, 2021, did without a legal purpose, maliciously engage in a course of conduct that seriously annoyed VICTIM 1, with intent to seriously annoy VICTIM 1, after request to desist.

*CJIS 1\_0191*

*CR 3-803*

*Penalty: \$500.00 and/or 90 DAYS*

**ADDITIONAL USE OF PERSONAL INFORMATION - VICTIM 2**

116. The Grand Jury incorporates paragraphs 1- 12 and 61-67 and 100-113 of this Indictment as though fully set forth herein.

117. On or about September 2020, VICTIM 2 and CHAUDRY terminated their romantic relationship. CHAUDRY continued to engage in a course of conduct he commenced during their relationship including, but not limited to, behavior listed in paragraphs 117-123 in addition to what has been incorporated above.

118. From February 22, 2019, while CHAUDRY and VICTIM 2 were still dating, until April 12, 2021, CHAUDRY issued subpoenas for VICTIM 2's phone records six (6) times.

119. During the relationship CHAUDRY would tell VICTIM 2 information related to her family that she had asked him not to access and that she believed he discovered through official channels. VICTIM 2 told CHAUDRY to stop whatever he was doing.

120. On or about December 8, 2020, CHAUDRY subpoenaed jail calls made by a relative of VICTIM 2. These included personal conversations between VICTIM 2 and her relative.

121. On or about December 21, 2020, CHAUDRY subpoenaed all visitor and call logs for a relative of VICTIM 2.

122. VICTIM 2 called 911 on January 31, 2021 at 19:48. CHAUDRY subpoenaed phone records for VICTIM 2 for the period of January 1, 2021 through February 8, 2021 on February 8, 2021.

123. On or about February 24, 2021, CHAUDRY sent a letter on Baltimore City State's Attorney Letterhead requesting a CAD report and 911 recording for a call for service made by VICTIM 2, stating in the letter that the request "is pertinent to a legitimate law enforcement inquiry."

**COUNT 83 - STALKING**

124. From on or about February 22, 2019 until April 12, 2021, at Baltimore City, Maryland, ADAM L. CHAUDRY did stalk VICTIM 2.

*CJIS CODE 1\_6525  
CR §3-802(c)  
Penalty: 5 years and/or \$5,000*

**COUNT 84 - HARASSMENT**

125. From on or about February 22, 2019 until April 12, 2021, did without a legal purpose, maliciously engage in a course of conduct that seriously annoyed VICTIM 2, with intent to seriously annoy VICTIM 2, after request to desist.

*CJIS 1\_0191  
CR 3-803  
Penalty: \$500.00 and/or 90 DAYS*

**OFFICIAL CORRESPONDENCE TO OBTAIN \$10,000**

126. The Grand Jury incorporates paragraphs 1- 12 and 61-67 and 100-113 and 116-123 of this Indictment as though fully set forth herein.

127. On or about July 9, 2018, CHAUDRY began exchanging text messages with a personal acquaintance about money the acquaintance believed she had loaned to one of her ex-boyfriends.

128. On November 6, 2018, CHAUDRY texted the personal acquaintance, in part, "...I'll have my investigators run and check on him [VICTIM 6] to see where he is staying. I can likely sending [sic] Target letter to both him and [name of VICTIM 6's sports agent] indicating the state is investigating the matter in a criminal capacity."

129. On or about December 20, 2018, at 4:22 p.m., CHAUDRY sent an email from his official Baltimore City State's Attorney's Office email address to VICTIM 6's personal email address.

130. The email read, in part, "In Re Grand Jury Investigation \* State of Maryland". Good afternoon. This correspondence is to serve as notice to you that the Office of the State's Attorney has opened a criminal investigation into the failure of remittance of payment. Attached you will find more information as to the same."

131. Attached to the email was a formal letter written on Baltimore City State's Attorney's Office official letter head. The letter read, in part, "I am writing to notify you that the Office of the State's Attorney for Baltimore City has opened a criminal investigation into the failure of remittance of payment pursuant to an agreement entered into with a [Personal Acquaintance full name]. Should both parties reach an agreement for an alternative resolution for which the amount outstanding \$10,000.00 U.S. currency is recovered in full; the State will note the same as satisfactorily closed." The letter is addressed from "Marilyn J. Mosby, States Attorney for Baltimore City" and is signed by CHAUDRY.

132. At no time was there an official investigation by the Baltimore City State's Attorney's Office into any of the allegations related to VICTIM 6.

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**COUNT 85 – EXTORTION**

133. On or about December 20, 2018, ADAM LANE CHAUDRY did attempt to obtain, by threat of prosecution in the form of a target letter, \$10,000 having the value of at least \$10,000 but less than \$100,000 from VICTIM 6, in violation of CR 3- 701(b) of the Annotated Code of Maryland.

*CJIS Code 1\_1206  
CR 3-701(b)  
Penalty: \$25,000 and/or 25 years*

**COUNT 86 - EXTORTION BY STATE OR LOCAL GOVERNMENT OFFICER OR EMPLOYEE**

134. On or about December 20, 2018, ADAM L. CHAUDRY did, being an Assistant State's Attorney of the Baltimore City State's Attorney's Office attempt to obtain by extortion money having a value of \$10,000 at least \$10,000.00 but less than \$100,000 from VICTIM 6.

*CJIS code 1\_1216  
CR 3-702  
Penalty: \$15,000 and/or 15 years*

**COUNT 87 - EXTORTION BY WRITTEN THREAT**

135. On or about December 20, 2018, ADAM L. CHAUDRY did, with intent to unlawfully extort money, to wit: \$10,000, from VICTIM 6, knowingly send and part with the possession of, a writing threatening to accuse said person of a crime that if true, would bring the person into contempt.

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*CJIS code 1\_1706  
CR 3-706 (b)(1)  
Penalty: \$10,000 and/or 10 YRS*



**COUNT 88 - EXTORTION BY WRITTEN THREAT**


136. On or about December 20, 2018, ADAM L. CHAUDRY did, with intent to unlawfully extort money, to wit: \$10,000, from VICTIM 6, knowingly send and part with the possession of, a writing threatening to cause economic damage to said person.

*CJIS code 1\_1707  
CR 3-706 (b)(2)  
Penalty: \$10,000 and/or 10 YRS*

Respectfully submitted,

Charlton T. Howard III  
MARYLAND STATE PROSECUTOR

BY:

  
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