

STATE OF MARYLAND
V.
ALEXANDRA GILBREATH

Defendant

* IN THE
* CIRCUIT COURT FOR
* ANNE ARUNDEL COUNTY

* CASE NO.: CO2CR-22-580

* * * * *

CRIMINAL INFORMATION

THE STATE PROSECUTOR for the State of Maryland informs and charges the Defendant, ALEXANDRA GILBREATH, with having committed the following offenses:

INTRODUCTION AND BACKGROUND

At all times relevant to this Information:

1. Alexandra Gilbreath (hereinafter GILBREATH) was appointed as Treasurer for the political committee "Team 30 Slate" on or about May 16, 2014, and continued to serve in that capacity at all times pertinent to this Information.
2. Team 30 Slate held a bank account at Severn Savings Bank in Annapolis, Maryland in the name "Team 30 Slate Committee."
3. On June 5, 2014, GILBREATH became an authorized signor on the "Team 30 Slate" bank account at Severn Savings Bank in her capacity as Treasurer.
4. In her capacity as Treasurer, GILBREATH was responsible for receiving and depositing all contributions into the slate bank account, dispersing funds from the slate bank account, and accounting for all receipts for expenditures made by the slate.
5. As Treasurer, GILBREATH was required by the Election Law Article and accompanying regulations to ensure that any expenditures from the slate bank account were made in accordance

with the purpose of the slate. GILBREATH had no authority to utilize the money in the “Team 30 Slate” bank account for her personal use or benefit.

6. Venmo is a mobile money transfer service which permits users to link their Venmo accounts to a bank account that funds money transfers to other Venmo users. Venmo is a service of PayPal, Inc., located in New York.

7. From October 10, 2018 through and including January 2, 2019, GILBREATH used the “Team 30 Slate” bank account held at Severn Savings Bank to fund her personal Venmo account, which she in turn used to pay for personal expenses. The total amount transferred from the slate to GILBREATH’s personal Venmo account totaled \$4,321.21.

8. As Treasurer, GILBREATH had a duty to file timely campaign finance reports under penalties of perjury with the State Board of Elections in Annapolis, Maryland, that accurately reported all contributions and expenditures made to or from the “Team 30 Slate.”

9. If the State Board of Elections identified any deficiencies within campaign finance reports filed by “Team 30 Slate,” GILBREATH, as a responsible officer, was required to file an amended campaign finance report correcting the deficiencies within 30 days.

10. On October 2, 2018, GILBREATH wrote a check to herself from the “Team 30 Slate” bank account for \$1,000, which she endorsed and deposited in her personal checking account held at Capital One.

11. On October 19, 2018 GILBREATH made a \$300 cash withdrawal from the “Team 30 Slate” bank account.

12. On October 30, 2018, GILBREATH electronically filed the 2018 Pre General 2 campaign finance report with the State Board of Elections under penalties of perjury. The report was required to document all transactions beginning on June 11, 2018 and ending on October 21, 2018. The

report failed to list the October 2, 2018 \$1,000 check written to GILBREATH and the October 19, 2018, \$300 cash withdrawal.

13. On November 6, 2018, GILBREATH made a \$300 cash withdrawal from the "Team 30 Slate" bank account.

14. On November 9, 2018, GILBREATH made a \$300 cash withdrawal from the "Team 30 Slate" bank account.

15. On November 13, 2018, GILBREATH made a \$250 cash withdrawal from the "Team 30 Slate" bank account.

16. On November 26, 2018, GILBREATH electronically filed the 2018 Post General campaign finance report with the State Board of Elections under penalties of perjury. The report was required to document all transactions beginning on October 22, 2018 and ending on November 13, 2018. The report failed to list the following transactions: November 5, 2018, \$1,000 transfer to Venmo; November 6, 2018, \$300 cash withdrawal; November 9, 2018, \$300 cash withdrawal; November 13, 2018, \$250 cash withdrawal; and November 13, 2018, \$100 transfer to Venmo.

17. The State Board of Elections notified "Team 30 Slate" on or about May 29, 2019 that the (1) 2018 Gubernatorial Post-General, (2) 2018 Gubernatorial Pre-General 2 Report, and (3) 2018 Gubernatorial Pre-Primary 2 reports contained deficiencies that needed to be remedied by July 8, 2019. However, GILBREATH has failed to amend these reports to correct the deficiencies and has failed to pay the late fees associated with the missing reports, which total \$1,500.

18. The 2021 Annual campaign finance report was due on January 20, 2021. GILBREATH failed to file the 2021 Annual campaign finance report and failed to pay the corresponding late fees for the report, totaling \$1,000.

COUNT ONE:
THEFT SCHEME: \$1,000 TO LESS THAN \$25,000

From October 10, 2018 through and including January 2, 2019, at Anne Arundel County, Maryland, ALEXANDRA GILBREATH did, pursuant to one scheme and continuing course of conduct, steal money of "Team 30 Slate," having a value of \$4,321.21, at least \$1,500 but less than \$25,000, to wit: GILBREATH, being the duly appointed Treasurer for the political committee "Team 30 Slate" and having signatory authority over the bank account of said entity, transferred money from the "Team 30 Slate" bank account to GILBREATH's Venmo account for her personal use and benefit, in violation of CR 7-104 of the Annotated Code of Maryland and against the peace, government and dignity of the State.

CR 7-104
Penalty: 5 years and/or \$10,000
CJIS: 1-1160

COUNT TWO:
FRAUDULENT MISAPPROPRIATION BY A FIDUCIARY

From October 10, 2018 through and including January 2, 2019, at Anne Arundel County, Maryland, ALEXANDRA GILBREATH, being a fiduciary of the political committee known as "Team 30 Slate," did fraudulently and willfully appropriate to a use not in the due and lawful execution of her trust, money received by her in her fiduciary capacity, to wit: GILBREATH, being the duly appointed Treasurer for the political committee "Team 30 Slate" and having a duty to ensure that expenditures from the slate bank account were made in accordance with the purpose of the slate pursuant to the Election Law article, transferred in total \$4,321.21 from the "Team 30 Slate" bank account to GILBREATH's personal Venmo account for her personal use and benefit,

in violation of CR 7-113 of the Annotated Code of Maryland, and against the peace, government and dignity of the State.

CR 7-113

Penalty: Not less than 1 year and not exceeding 5 years

CJIS Code: 1-2799

**COUNT THREE:
PERJURY/AFFIDAVIT REQUIRED BY LAW
2018 Pre General 2 Report**

On October 30, 2018, at Anne Arundel County, Maryland, ALEXANDRA GILBREATH did, in an affidavit required by law to be taken, to wit: the 2018 Pre General 2 campaign finance report for "Team 30 Slate," required by Election Law Article §13-304, willfully and falsely make an affirmation under penalties of perjury that the report was complete and accurate, when in fact the report failed to include an October 2, 2018 \$1,000 check that GILBREATH wrote to herself from the "Team 30 Slate" bank account, and an October 19, 2018 \$300 cash withdrawal that GILBREATH made from the "Team 30 Slate" bank account, the matters so sworn being material, in violation of Criminal Law Article, Section 9-101 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

CR 9-101

Penalty: 10 years

CJIS Code: 1-0307

**COUNT FOUR:
PERJURY/AFFIDAVIT REQUIRED BY LAW
2018 Post General Report**

On November 26, 2018, at Anne Arundel County, Maryland, ALEXANDRA GILBREATH did, in an affidavit required by law to be taken, to wit: the 2018 Post General

campaign finance report for “Team 30 Slate,” required by Election Law Article §13-304, willfully and falsely make an affirmation under penalties of perjury that the report was complete and accurate, when in fact the report failed to include a November 5, 2018 \$1,000 transfer to GILBREATH’s personal Venmo account; November 6, 2018, \$300 cash withdrawal; November 9, 2018, \$300 cash withdrawal; November 13, 2018, \$250 cash withdrawal; and November 13, 2018, \$100 transfer to GILBREATH’s personal Venmo account, the matters so sworn being material, in violation of Criminal Law Article, Section 9-101 of the Annotated Code of Maryland, and against the peace, government and dignity of the State.

CR 9-101

Penalty: 10 years

CJIS Code: 1-0307

**COUNT FIVE:
FAILURE TO FILE CAMPAIGN FINANCE REPORT**

On January 20, 2021, at Anne Arundel County, Maryland, ALEXANDRA GILBREATH did, being the Treasurer, a responsible officer for “Team 30 Slate,” fail to file a campaign finance report required by Election Law Article 13-304, to wit: the 2021 Annual Report, due on January 20, 2021, in violation of Election Law Article Section 13-327 of the Annotated Code of Maryland, and against the peace, government, and dignity of the State.

EL 13-327 (a)

Penalty: 1 year and/or \$25,000

CJIS Code: 1- 0183

**COUNT SIX:
FAILURE TO FILE AN AMENDED CAMPAIGN FINANCE REPORT
2018 Gubernatorial Post-General**

On July 8, 2019, at Anne Arundel County, Maryland, ALEXANDRA GILBREATH did, being the Treasurer, a responsible officer for “Team 30 Slate, fail to file an amended 2018 Gubernatorial Post-General campaign finance report within 30 days after receiving the May 29,

2019 written notice of the deficiency by the State Board, in violation of Election Law Article Section 13-327 of the Annotated Code of Maryland, and against the peace, government, and dignity of the State.

EL 13-327 (b)

Penalty: 1 year and/or \$25,000

CJIS Code: 1- 0183

**COUNT SEVEN:
FAILURE TO AMEND CAMPAIGN FINANCE REPORT
2018 Gubernatorial Pre-General 2 Report**

On July 8, 2019, at Anne Arundel County, Maryland, ALEXANDRA GILBREATH did, being the Treasurer, a responsible officer for “Team 30 Slate, fail to file an amended 2018 Gubernatorial Pre-General 2 campaign finance report within 30 days after receiving the May 29, 2019 written notice of the deficiency by the State Board, in violation of Election Law Article Section 13-327 of the Annotated Code of Maryland, and against the peace, government, and dignity of the State.

EL 13-327 (b)

Penalty: 1 year and/or \$25,000

CJIS Code: 1 0183

**COUNT EIGHT:
FAILURE TO AMEND CAMPAIGN FINANCE REPORT
2018 Gubernatorial Pre-Primary 2 Report**

On July 8, 2019, at Anne Arundel County, Maryland, ALEXANDRA GILBREATH did, being the Treasurer, a responsible officer for “Team 30 Slate, fail to file an amended 2018 Gubernatorial Pre-Primary 2 campaign finance report within 30 days after receiving the May 29, 2019 written notice of the deficiency by the State Board, in violation of Election Law Article

Section 13-327 of the Annotated Code of Maryland, and against the peace, government, and dignity of the State.

EL 13-327 (b)

Penalty: 1 year and/or \$25,000

CJIS Code: 1 0183

Respectfully Submitted,

Charlton T. Howard, III
Maryland State Prosecutor

By: 

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REQUEST FOR SUMMONS

PLEASE ISSUE a criminal summons in this case for the Defendant, ALEXANDRA GILBREATH, at the following address: 1001 Cedar Ridge Court, Annapolis, MD 21403.


Lindsay E. Bird
Senior Assistant State Prosecutor