

Statement of Facts

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

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 through the present.

Team 30 Slate held a bank account at Severn Savings Bank in Anne Arundel County, Maryland in the name “Team 30 Slate Committee.” 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.

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. 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 or for any reason other than an approved electoral purpose.

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. 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.

For example, on November 2, 2018, GILBREATH transferred \$1,000 of “Team 30 Slate” funds to Regina Shaw via Venmo. On November 28, 2018, GILBREATH transferred \$60 of “Team 30 Slate” funds to Regina Shaw via Venmo. Regina Shaw would testify that she and GILBREATH were roommates. The payments to Ms. Shaw with money from the “Team 30 Slate” bank account were for GILBREATH’s personal rent and groceries and not in any way related to the purposes of “Team 30 Slate.”

The money that GILBREATH used for her personal expenses was the property of “Team 30 Slate,” a political committee formed and located in Anne Arundel County, Maryland. If called to testify witness would identify defendant ALEXANDRA GILBREATH as the individual who engaged in the theft.