

STATE OF MARYLAND

\*

IN THE

V.

\*

CIRCUIT COURT FOR

WILLIAM C. MCCOLLUM

\*

BALTIMORE COUNTY

*Defendant*

\*

CASE NO.: C-03-CR-23-000803

\* \* \* \* \*

**CRIMINAL INFORMATION**

THE STATE PROSECUTOR for the State of Maryland, informs and charges, WILLIAM CHRISTOPHER MCCOLLUM with having committed the following offenses:

**I. INTRODUCTION AND BACKGROUND**

At all times relevant to this Information:

1. The State Board of Elections is a state agency created to ensure compliance with the requirements of Maryland and federal election laws by all persons involved in the election process.
2. Campaign Finance Law is regulated by Title 13 of the Election Law Article of the *Annotated Code of Maryland*.
3. A campaign finance entity, also known as a political committee, is a combination of two or more individuals that has a major purpose promoting the success or defeat of a candidate, political party, or question. Each political committee has two responsible officers, a Chairperson and a Treasurer.
4. William C. McCollum (hereinafter MCCOLLUM) began working for the Baltimore County Agricultural Center in 2010.
5. In or about August 2020, MCCOLLUM was named the acting director of economic development for Baltimore County Government.

6. In his personal capacity, MCCOLLUM served as Treasurer to the campaign finance entity "Friends of Cathy Bevins."

7. In his personal capacity, MCCOLLUM served as Treasurer to the campaign finance entity the "Baltimore County Victory Slate."

## **II. FRIENDS OF CATHY BEVINS**

8. The State incorporates paragraphs 1 - 7 of this Information as though fully set forth herein.

9. "Friends of Cathy Bevins" is a campaign finance entity established to promote the successful candidacy of Cathy Bevins to a seat on the Baltimore County Council.

10. Ms. Bevins represented Baltimore County Council District 6. She was first elected on November 2, 2010, and most recently re-elected on November 6, 2018, for a term that concluded in December 2022.

11. MCCOLLUM served as the Treasurer for the "Friends of Cathy Bevins" campaign finance entity beginning on June 24, 2014, continuing through August 16, 2022. As a campaign finance entity, "Friends of Cathy Bevins" is regulated by Title 13 of the Election Law Article.

12. As Treasurer, MCCOLLUM was responsible for receiving and depositing all contributions into the bank account for the campaign finance entity, "Friends of Cathy Bevins", dispersing funds from the "Friends of Cathy Bevins" bank account, and accounting for all receipts for expenditures made by the "Friends of Cathy Bevins".

13. To ensure transparency and accountability in campaign finance entities, campaign finance reports are required to be filed at least once a year and as many as six times a year in an election year.

14. Campaign finance reports are filed electronically with the State Board of Elections on approved software.

15. As Treasurer, MCCOLLUM had a duty to file timely campaign finance reports under penalties of perjury with the State Board of Elections, that accurately reported all contributions and expenditures made to or from the "Friends of Cathy Bevins."

16. The campaign finance reports that are submitted and the bank accounts that support the reports are the responsibility of the Treasurer and Chairperson of the campaign, not the candidate.

17. The "Friends of Cathy Bevins" maintained its own bank account at Bank of America until March 16, 2022.

18. As Treasurer, MCCOLLUM was required by the Election Law Article and accompanying regulations to ensure that any expenditures from the campaign finance entity's bank account were made in accordance with the purpose of the "Friends of Cathy Bevins". MCCOLLUM had no authority to utilize the money in the "Friends of Cathy Bevins" bank account for his personal use or benefit.

19. The Treasurer of the "Friends of Cathy Bevins" serves as a fiduciary of the campaign finance entity.

20. Throughout his time serving as Treasurer for the "Friends of Cathy Bevins" finance entity, MCCOLLUM used funds that were required to be used solely to benefit the campaign finance entity for personal use.

#### **COUNT ONE**

##### **"Friends of Cathy Bevins" Embezzlement**

21. From April 23, 2015 through and including January 31, 2020, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM, being a fiduciary of the political committee known as "Friends of Cathy Bevins" did fraudulently and willfully appropriate to a use not in the due and lawful execution of his trust, money held by him in his fiduciary capacity, to wit: MCCOLLUM, being the duly appointed Treasurer for the political committee "Friends of

Cathy Bevins,” and having a duty to ensure that contributions and expenditures were made in accordance with the purpose of the committee and in compliance with the Election Law article, deposited \$111,014.89 of funds belonging to the political committee Friends of Cathy Bevins into his personal bank account for his personal use and benefit, in violation of Criminal Law Article, §7-113 of the *Annotated Code of Maryland*, and against the peace, government, and dignity of the State.

**CR 7-113**

**CJIS Code 1-2799**

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

#### **AMERICAN EXPRESS PAYMENTS**

22. The State incorporates paragraphs 1 – 20 of this Information as though fully set forth herein.

23. MCCOLLUM maintained several American Express credit cards in his own name that were not associated with the “Friends of Cathy Bevins” campaign finance entity.

24. MCCOLLUM, however, having access to funds collected for the “Friends of Cathy Bevins”, from on or about July 21, 2016, through and including January 3, 2020, used the Bank of America account associated with the “Friends of Cathy Bevins” campaign finance entity to pay \$64,189.89 towards his personal American Express bills.

25. For example, on or about September 8, 2016, MCCOLLUM used \$3,300 of funds from the “Friends of Cathy Bevins” bank account to pay his American Express bill.

26. The candidate did not have knowledge of this expenditure. The candidate did not approve this expenditure.

27. For example, on or about February 8, 2017, MCCOLLUM used \$3,800 of funds from the “Friends of Cathy Bevins” bank account to pay his American Express bill.

28. The candidate did not have knowledge of this expenditure. The candidate did not approve this expenditure.

29. For example, on or about August 6, 2018, MCCOLLUM used \$3,221.10 of funds from the "Friends of Cathy Bevins" bank account to pay his American Express bill.

30. The candidate did not have knowledge of this expenditure. The candidate did not approve this expenditure.

31. For example, on or about May 28, 2019, MCCOLLUM used \$6,451.24 of funds from the "Friends of Cathy Bevins" bank account to pay his American Express bill.

32. The candidate did not have knowledge of this expenditure. The candidate did not approve this expenditure.

33. For example, on or about August 5, 2019, MCCOLLUM used \$6,109.39 of funds from the "Friends of Cathy Bevins" bank account to pay his American Express bill.

34. The candidate did not have knowledge of this expenditure. The candidate did not approve this expenditure.

35. On several occasions, the amount of money that MCCOLLUM paid from the "Friends of Cathy Bevins" account was the exact same amount due to meet his minimum payment obligation on one of his personal American Express cards.

#### **COUNT TWO**

**Theft Scheme \$25,000 to Under \$100,000**

**American Express Payments from Friends of Cathy Bevins bank account**

36. On or about July 21, 2016 through and including January 3, 2020, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, pursuant to one scheme and continuing course of conduct, steal \$64,189.89 from the "Friends of Cathy Bevins", in the form of payments to MCCOLLUM's personal American Express credit cards from the "Friends of Cathy Bevins"

bank account, having a value of at least \$25,000 but less than \$100,000, in violation of Criminal Law Article, § 7-104 of the Annotated Code of Maryland and against the peace, government, and dignity of the State.

**CR 7-104**

**CJIS Code 1-1139**

**Penalty: 10 years and/or \$15,000**

### **CONTRIBUTION CHECKS**

37. The State incorporates paragraphs 1 – 20 and paragraphs 22 – 35 of this Information as though fully set forth herein.

38. In his role as Treasurer, MCCOLLUM was responsible for collecting and depositing contribution checks into the “Friends of Cathy Bevins” bank account.

39. The law restricts candidate access to these checks, and the responsibility to ensure that the checks are deposited and recorded on the campaign report lies with the Treasurer.

40. As part of the effort to elect Cathy Bevins, the “Friends of Cathy Bevins” hosted fundraisers and collected checks from individuals and organizations that supported the campaign finance entity.

41. Instead of depositing some of these checks in the “Friends of Cathy Bevins” campaign account at Bank of America, from on or about July 17, 2015 through and including June 19, 2018, MCCOLLUM deposited \$28,400.00 worth of checks directly into his personal account for his personal use.

42. For example, on or about August 4, 2015, MCCOLLUM deposited \$6,000 worth of checks made payable to the “Friends of Cathy Bevins” into his personal bank account.

43. The candidate did not know about this deposit. The candidate did not approve this deposit.



44. For example, on or about September 2, 2015, MCCOLLUM deposited \$4,000 worth of checks made payable to the "Friends of Cathy Bevins" into his personal bank account.

45. The candidate did not know about this deposit. The candidate did not approve this deposit.

46. For example, between on or about November 2, 2017 through and including on or about December 12, 2017, MCCOLLUM deposited \$4,500 worth of checks, all of which were made payable to the "Friends of Cathy Bevins" into his personal bank account.

47. The candidate did not know about these deposits. The candidate did not approve these deposits.

48. For example, on or about June 19, 2018, MCCOLLUM deposited a check totaling \$2,900, which was made payable to the "Friends of Cathy Bevins" into his personal bank account.

49. The candidate did not know about this deposit. The candidate did not approve this deposit.

50. These checks, though intended by the donors as campaign contributions, were not reported on any campaign finance reports.

51. The candidate did not know about the attempted donations to the "Friends of Cathy Bevins" campaign finance entity. The candidate did not know about MCCOLLUM's deposits. The candidate did not approve any deposits of checks issued to the "Friends of Cathy Bevins" into MCCOLLUM's personal bank account.

### **COUNT THREE**

Theft scheme \$25,000 to Under \$100,000:  
Checks made out to FOCB cashed in personal bank account

52. On or about July 17, 2015 through and including June 19, 2018, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, pursuant to one scheme and continuing course of conduct, steal \$28,400.00 from the "Friends of Cathy Bevins", by depositing checks made payable to the "Friends of Cathy Bevins" into his personal bank account, having a value of, at least \$25,000 but less than \$100,000, in violation of Criminal Law Article, § 7-104 of the *Annotated Code of Maryland* and against the peace, government, and dignity of the State.

**CR 7-104**

**CJIS Code 1-1139**

**Penalty: 10 years and/or \$15,000**

### **VENDOR CHECKS**

53. The State incorporates paragraphs 1 – 20; paragraphs 22 – 35; and paragraphs 37 – 51 of this Information as though fully set forth herein.

54. As part of his duties as Treasurer, MCCOLLUM was responsible for making expenditures via check to vendors who performed services for the campaign.

55. From on or about April 23, 2015 through and including January 9, 2018, MCCOLLUM wrote checks to several purported campaign vendors, but instead of delivering the checks to the vendors he deposited \$13,425.00 worth of checks into his own personal bank account.

56. For example, on or about April 23, 2015, MCCOLLUM wrote a check to "PF LLC" from the "Friends of Cathy Bevins" for \$3,750. MCCOLLUM deposited this check into his own personal bank account.

57. The candidate did not know about or approve MCCOLLUM depositing this check into his own bank account.



58. For example, on or about October 11, 2016, MCCOLLUM wrote a check to "PF IT" from the "Friends of Cathy Bevins" for \$3,000. MCCOLLUM deposited this check into his own personal bank account.

59. The candidate did not know about or approve MCCOLLUM depositing this check into his own bank account.

#### **COUNT FOUR**

Theft Scheme: \$1,500 to Under \$25,000  
FOCB False vendor checks

60. On or about April 23, 2015 through and including January 9, 2018, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, pursuant to one scheme and continuing course of conduct, steal \$13,425.00 from the "Friends of Cathy Bevins", by writing checks to purported vendors of "Friends of Cathy Bevins" from the "Friends of Cathy Bevins" bank account in his capacity as Treasurer, but depositing those checks into his personal bank account, having a value of, at least \$1,500 but less than \$25,000, in violation of Criminal Law Article, § 7-104 of the *Annotated Code of Maryland* and against the peace, government, and dignity of the State.

**CR 7-104**

**CJIS Code 1-1160**

**Penalty: 5 years and/or \$10,000**

#### **ELECTRONIC TRANSFER**

61. The State incorporates paragraphs 1 – 20; paragraphs 22 – 35; paragraphs 37 - 51; paragraphs and 53 – 59 of this Information as though fully set forth herein.

62. As Treasurer, MCCOLLUM was able to make expenditures via electronic funds transfers from "Friends of Cathy Bevins" for the benefit of the campaign.

63. Electronic Funds Transfers must be reported under penalties of perjury on campaign finance reports.

64. On or about January 31, 2020, MCCOLLUM electronically transferred \$5,000 of funds from the "Friends of Cathy Bevins" campaign finance entity directly into his personal account.

65. MCCOLLUM did not record the transfer on any of the required campaign finance reports filed with the State Board of Elections.

66. The candidate had no knowledge of the electronically transferred funds. The candidate did not approve of the electronically transferred funds.

#### **COUNT FIVE**

**FOCB Theft \$1,500 to Under \$25,000**

67. On or about January 31, 2020, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did steal \$5,000.00 from the "Friends of Cathy Bevins", by initiating an electronic funds transfer of \$5,000.00 from the "Friends of Cathy Bevins" bank account to his personal bank account, having a value of at least \$1,500 but less than \$25,000, in the violation of Criminal Law Article, § 7-104 of the *Annotated Code of Maryland* and against the peace, government and dignity of the State.

**CR 7-104**

**CJIS Code 1-1136**

**Penalty: 5 years and/or \$10,000**

#### **PERSONAL TRAVEL EXPENSES**

68. The State incorporates paragraphs 1 – 20; paragraphs 22 – 35; paragraphs 37 - 51; paragraphs 53 – 59; and paragraphs 61 – 66; of this Information as though fully set forth herein.

69. As Treasurer, MCCOLLUM was authorized to use the "Friends of Cathy Bevins" account to pay for campaign expenses.

70. MCCOLLUM charged personal travel expenses from the campaign account for \$2,639.62 of charges during his out of state and international personal travel during his time as

treasurer for "Friends of Cathy Bevins" from September 2, 2014 through and including July 8, 2019.

71. For example, on or about November 24, 2014, MCCOLLUM made an ATM cash withdrawal for \$202.50 in Reidsville, North Carolina from the "Friends of Cathy Bevins" bank account.

72. For example, on or about December 23, 2014, MCCOLLUM made an ATM cash withdrawal for \$102.00 in Mebane, North Carolina from the "Friends of Cathy Bevins" bank account.

73. The Maryland Election Law Article and corresponding regulations prohibit campaign funds from being accessed through ATM cash withdrawals.

74. The candidate was unaware of and did not approve of any campaign expenses in North Carolina.

75. For example, on or about June 29, 2015, MCCOLLUM charged \$117.47 at Flemings Prime Steakhouse and Wine Bar in Beavercreek, Ohio.

76. The candidate was unaware of and did not approve of any campaign expenses in Ohio.

77. For example, on or about November 21, 2016, MCCOLLUM charged the "Friends of Cathy Bevins" campaign finance entity for tickets on the Icelandic budget airline, WOW airline, for \$372.96 and \$402.96.

78. MCCOLLUM entered Iceland through the Keflavik Airport on January 17, 2017 and returned to the United States on January 23, 2017.

79. This expense was not reported on the required campaign finance reports.

80. The candidate was unaware of and did not approve of any international travel with campaign funds.

81. For example, on or about March 12, 2019, MCCOLLUM charged the "Friends of Cathy Bevins" account \$540.00 for airfare while travelling in Puerto Rico with a romantic partner.
82. The campaign finance report reflected that the Puerto Rico airfare expense was for "Staff Travel".
83. The candidate was unaware of and did not approve of any campaign expenses with MCCOLLUM'S romantic partner in San Juan, Puerto Rico.
84. For example, on or about July 8, 2019, MCCOLLUM charged the "Friends of Cathy Bevins" account \$496.98 for airline tickets to West Palm Beach, Florida.
85. The campaign finance report reflected that funds used to purchase the flight were for "Utilities-Internet Access."
86. The candidate was unaware of and did not approve of any campaign expenses in West Palm Beach, Florida.

#### **COUNT SIX**

##### **FOCB Embezzlement- Personal Travel Expenses**

87. From September 2, 2014 through and including July 8, 2019, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM, being a fiduciary of the political committee known as "Friends of Cathy Bevins" did fraudulently and willfully appropriate to a use not in the due and lawful execution of his trust, money held by him in his fiduciary capacity, to wit: MCCOLLUM, being the duly appointed Treasurer for the political committee "Friends of Cathy Bevins," and having a duty to ensure that contributions and expenditures were made in accordance with the purpose of the committee and in compliance with the Election Law article, utilized \$2,639.62 of funds belonging to the political committee "Friends of Cathy Bevins" to engage in international and national travel, and expenses associated with that travel, which was for

his personal use and benefit, in violation of Criminal Law Article, § 7-113 of the *Annotated Code of Maryland*, and against the peace, government, and dignity of the State.

**CR 7-113**

**CJIS Code 1-2799**

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

## **II. CAMPAIGN FINANCE REPORTS (CFRs): FRIENDS OF CATHY BEVINS**

88. The State incorporates paragraphs 1 – 20; paragraphs 22 – 35; paragraphs 37 - 51; paragraphs 53 – 59; paragraphs 61 – 66; and paragraphs 68 – 86 of this Information as though fully set forth herein.

89. A Campaign Finance Report is a detailed accounting of contributions, transfers, expenditures, outstanding obligations, and loans, by a political committee as required under Section 13-304 of the Election Law Article.

90. All political committees must electronically file their campaign finance reports or affidavits with the State Board of Elections on State Board of Elections approved software.

91. The campaign finance reports are filed under the penalty of perjury and an e-signature is required at the time of submission.

92. The campaign finance reports are public and published on a website managed by the State Board.

93. The candidate can review the published reports, but those reports are separate from the actual bank account for the “Friends of Cathy Bevins”, which was managed by MCCOLLUM as he was the only signatory authority on the “Friends of Cathy Bevins” bank account.

94. The reports for “Friends of Cathy Bevins” were filed by MCCOLLUM and signed by MCCOLLUM under the penalty of perjury in Baltimore County, Maryland.

**COUNT SEVEN**

Perjury/ Affidavit Required by Law  
FOCB 2016 Annual report

95. On January 27, 2016, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, in an affidavit required by law to be taken, to wit: the 2016 Annual campaign finance report for "Friends of Cathy Bevins," required by Election Law Article §13-304, willfully and falsely make an affirmation under penalties of perjury that the report and accompanying schedules were complete and accurate, the matters so sworn being material, in violation of Criminal Law Article, § 9-101 of the *Annotated Code of Maryland*, and against the peace, government and dignity of the State.

**CR 9-101**  
**CJIS Code 1-0307**  
**Penalty: 10 years**

**COUNT EIGHT**

Perjury/ Affidavit Required by Law  
FOCB 2017 Annual Report

96. On January 15, 2020, at Baltimore, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, in an affidavit required by law to be taken, to wit: the amended 2017 Annual campaign finance report for "Friends of Cathy Bevins," required by Election Law Article §13-304, willfully and falsely make an affirmation under penalties of perjury that the report and accompanying schedules were complete and accurate, the matters so sworn being material, in violation of Criminal Law Article, § 9-101 of the *Annotated Code of Maryland*, and against the peace, government and dignity of the State.

**CR 9-101**  
**CJIS Code 1-0307**  
**Penalty: 10 years**



**COUNT NINE**  
Perjury/ Affidavit Required by Law  
FOCB 2018 Annual Report

97. On January 15, 2020, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, in an affidavit required by law to be taken, to wit: the amended 2018 Annual campaign finance report for "Friends of Cathy Bevins," required by Election Law Article §13-304, willfully and falsely make an affirmation under penalties of perjury that the report and accompanying schedules were complete and accurate, the matters so sworn being material, in violation of Criminal Law Article, § 9-101 of the *Annotated Code of Maryland*, and against the peace, government and dignity of the State.

**CR 9-101**  
**CJIS Code 1-0307**  
**Penalty: 10 years**

**COUNT TEN**  
Perjury/ Affidavit Required by Law  
FOCB 2018 Pre-Primary 1

98. On January 15, 2020, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, in an affidavit required by law to be taken, to wit: the amended 2018 Pre-Primary 1 campaign finance report for "Friends of Cathy Bevins," required by Election Law Article §13-304, willfully and falsely make an affirmation under penalties of perjury that the report and accompanying schedules were complete and accurate, the matters so sworn being material, in violation of Criminal Law Article, § 9-101 of the *Annotated Code of Maryland*, and against the peace, government and dignity of the State.

**CR 9-101**  
**CJIS Code 1-0307**  
**Penalty: 10 years**

**COUNT ELEVEN**  
Perjury/ Affidavit Required by Law  
FOCB 2018 Pre-General 1

99. On January 15, 2020, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, in an affidavit required by law to be taken, to wit: the amended 2018 Pre-General 1 campaign finance report for "Friends of Cathy Bevins," required by Election Law Article §13-304, willfully and falsely make an affirmation under penalties of perjury that the report and accompanying schedules were complete and accurate, the matters so sworn being material, in violation of Criminal Law Article, § 9-101 of the *Annotated Code of Maryland*, and against the peace, government and dignity of the State.

**CR 9-101**  
**CJIS Code 1-0307**  
**Penalty: 10 years**

**COUNT TWELVE**  
Perjury/ Affidavit Required by Law  
FOCB 2018 Pre-General 2

100. On January 15, 2020, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, in an affidavit required by law to be taken, to wit: the amended 2018 Pre-General 2 campaign finance report for "Friends of Cathy Bevins," required by Election Law Article §13-304, willfully and falsely make an affirmation under penalties of perjury that the report and accompanying schedules were complete and accurate, the matters so sworn being material, in violation of Criminal Law Article, § 9-101 of the *Annotated Code of Maryland*, and against the peace, government and dignity of the State.

**CR 9-101**  
**CJIS Code 1-0307**  
**Penalty: 10 years**

**COUNT THIRTEEN**  
Perjury/ Affidavit Required by Law  
FOCB Perjury 2019 Annual

101. On January 15, 2020, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, in an affidavit required by law to be taken, to wit: the 2019 Annual campaign finance report for "Friends of Cathy Bevins," required by Election Law Article §13-304, willfully and falsely make an affirmation under penalties of perjury that the report and accompanying schedules were complete and accurate, the matters so sworn being material, in violation of Criminal Law Article, § 9-101 of the *Annotated Code of Maryland*, and against the peace, government and dignity of the State.

**CR 9-101**  
**CJIS Code 1-0307**  
**Penalty: 10 years**

**COUNT FOURTEEN**  
Perjury/ Affidavit Required by Law  
FOCB Perjury 2020 Annual

102. On January 15, 2020, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, in an affidavit required by law to be taken, to wit: the 2020 Annual campaign finance report for "Friends of Cathy Bevins," required by Election Law Article §13-304, willfully and falsely make an affirmation under penalties of perjury that the report and accompanying schedules were complete and accurate, the matters so sworn being material, in violation of Criminal Law Article, § 9-101 of the *Annotated Code of Maryland*, and against the peace, government and dignity of the State.

**CR 9-101**  
**CJIS Code 1-0307**  
**Penalty: 10 years**

**COUNT FIFTEEN**  
**Perjury/ Affidavit Required by Law**  
**FOCB Perjury 2021 Annual**

103. On April 14, 2021, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, in an affidavit required by law to be taken, to wit: the 2021 Annual campaign finance report for "Friends of Cathy Bevins," required by Election Law Article §13-304, willfully and falsely make an affirmation under penalties of perjury that the report and accompanying schedules were complete and accurate, the matters so sworn being material, in violation of Criminal Law Article, § 9-101 of the *Annotated Code of Maryland*, and against the peace, government and dignity of the State.

**CR 9-101**  
**CJIS Code 1-0307**  
**Penalty: 10 years**

**III. THE BALTIMORE COUNTY VICTORY SLATE**

104. The State incorporates paragraphs 1 – 20; paragraphs 22 – 35; paragraphs 37 - 51; paragraphs 53 – 59; paragraphs 61 – 66; paragraphs 68 – 86; and paragraphs 88 – 94 of this Information as though fully set forth herein.

105. The "Baltimore County Victory Slate" was formed on August 24, 2006.

106. The "Baltimore County Victory Slate" is a campaign finance entity also known as a campaign finance committee, which is regulated by Title 13 of the Election Law Article. Slates are governed by Section 13-209 of Maryland Election Law, which allows for two or more candidates who have established separate campaign finance entities to form a slate.

107. When candidates form a slate, they can transfer unlimited funds between the campaign finance entities that are participants in the slate.

108. MCCCOLLUM served as Treasurer of the "Baltimore County Victory Slate" from July 20, 2015 to the present.

109. As Treasurer, MCCOLLUM was responsible for receiving and depositing all contributions into the bank account for the campaign finance entity, "Baltimore County Victory Slate", dispersing funds from the "Baltimore County Victory Slate" bank account, and accounting for all receipts for expenditures made by the "Baltimore County Victory Slate".

110. To ensure transparency and accountability in campaign finance entities, campaign finance reports are required to be filed at least once a year and as many as six times a year in an election year.

111. Campaign finance reports are filed electronically with the State Board of Elections on approved software.

112. As Treasurer, MCCOLLUM had a duty to file timely campaign finance reports under penalties of perjury with the State Board of Elections, that accurately reported all contributions and expenditures made to or from the "Baltimore County Victory Slate."

113. The campaign finance reports that are submitted and the bank accounts that support the reports are the responsibility of the Treasurer and Chairperson of the campaign, not the members of the slate.

114. MCCOLLUM lived and worked in Baltimore County and would submit the forms electronically and sign the reports for "Baltimore County Victory Slate" under the penalty of perjury in Baltimore County, Maryland.

115. The "Baltimore County Victory Slate" maintains its own bank account at Bank of America.

116. As Treasurer, MCCOLLUM was required by the Election Law Article and accompanying regulations to ensure that any expenditures from the campaign finance entity's bank account were

made in accordance with the purpose of the "Baltimore County Victory Slate". MCCOLLUM had no authority to utilize the money in the "Baltimore County Victory Slate" bank account for his personal use or benefit.

117. The Treasurer of the campaign serves as a fiduciary of the campaign finance entity.

118. Throughout his time serving as Treasurer for the "Baltimore County Victory Slate", MCCOLLUM used funds that were required to be used solely to benefit the campaign finance entity for personal use.

#### **COUNT SIXTEEN**

##### **Baltimore County Victory Slate Embezzlement**

119. From May 27, 2015 through and including December 14, 2018 at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM, being a fiduciary of the political committee known as "Baltimore County Victory Slate" did fraudulently and willfully appropriate to a use not in the due and lawful execution of his trust, money held by him in his fiduciary capacity, to wit: MCCOLLUM, being the duly appointed Treasurer for the political committee "Baltimore County Victory Slate," and having a duty to ensure that contributions and expenditures were made in accordance with the purpose of the committee and in compliance with the Election Law article, deposited \$31,269.63 of funds belonging to the political committee Baltimore County Victory Slate into his personal bank account for his personal use and benefit, in violation of Criminal Law Article, § 7-113 of the *Annotated Code of Maryland*, and against the peace, government, and dignity of the State.

**CR 7-113**

**CJIS Code 1-2799**

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



### **AMERICAN EXPRESS PAYMENTS**

120. The State incorporates paragraphs 1 – 20; paragraphs 22 – 35; paragraphs 37 – 51; paragraphs 53 – 59; paragraphs 61 – 66; paragraphs 68 – 86; paragraphs 88 – 94; and paragraphs 104 – 118; of this Information as though fully set forth herein.

121. MCCOLLUM maintained several American Express credit cards in his own name that were not associated with the “Baltimore County Victory Slate” campaign finance entity.

122. MCCOLLUM, however, from on or about November 8, 2018 through and including December 14, 2018, having access to the “Baltimore County Victory Slate” campaign finance entity funds, used the Bank of America account associated with “Baltimore County Victory Slate” campaign finance entity to pay \$6,846.48 towards his personal American Express bill.

123. For example, on or about November 8, 2018, MCCOLLUM used \$2,500 of funds from the “Baltimore County Victory Slate” to pay his American Express bill.

124. The members of the slate did not have knowledge of this expenditure. The members of the slate did not approve this expenditure.

125. For example, on or about December 14, 2018, MCCOLLUM used \$1,000 of funds from the “Baltimore County Victory Slate” to pay his American Express bill.

126. The members of the slate did not have knowledge of this expenditure. The members of the slate did not approve this expenditure.

127. On several occasions, the amount of money that MCCOLLUM paid from the “Baltimore County Victory Slate” account was the exact same amount due to meet his minimum payment obligation on one of his personal American Express cards.

128. MCCOLLUM did not report on any required campaign finance reports that he had transferred funds from the "Baltimore County Victory Slate" account to pay his personal credit card.

**COUNT SEVENTEEN**

Theft Scheme: \$1,500 to Under \$25,000

American Express Payments from BCVS bank account

129. On or about November 8, 2018 through and including December 14, 2018, at Baltimore County, Maryland, WILLIAM CHRISOPHER MCCOLLUM did, pursuant to one scheme and continuing course of conduct, steal \$6,846.48, from the "Baltimore County Victory Slate", in the form of payments to MCCOLLUM's personal American Express credit cards from the "Baltimore County Victory Slate" bank account, having a value of, at least \$1,500 but less than \$25,000, in violation of Criminal Law Article, § 7-104 of the *Annotated Code of Maryland* and against the peace, government, and dignity of the State.

**CR 7-104**

**CJIS Code 1-1160**

**Penalty: 5 years and/or \$10,000**

**CONTRIBUTION CHECKS**

130. The State incorporates paragraphs 1 – 20; paragraphs 22 – 35; paragraphs 37 - 51; paragraphs 53 – 59; paragraphs 61 – 66; paragraphs 68 – 86; paragraphs 88 – 94; paragraphs 104 – 118; and paragraphs 120 – 128 of this Information as though fully set forth herein.

131. In his role as Treasurer, MCCOLLUM was responsible for collecting and depositing contribution checks to the "Baltimore County Victory Slate."

132. The law restricts candidate access to these checks. The responsibility to ensure that the checks are deposited and recorded on the campaign report lies with the Treasurer.

133. As part of the effort to elect the members of the "Baltimore County Victory Slate", the "Baltimore County Victory Slate" would solicit and collect checks from individuals and organizations that supported the slate.

134. Instead of depositing some of these checks in the "Baltimore County Victory Slate" campaign account at Bank of America, MCCOLLUM deposited the checks directly into his personal account for his personal use.

135. On or about May 2, 2018, MCCOLLUM deposited checks totaling \$4,300, which we made payable to the "Baltimore County Victory Slate" into his personal Bank of America Account.

136. The members of the slate did not have knowledge of these deposits. The members of the slate did not approve these deposits.

137. MCCOLLUM never transferred the money into the "Baltimore County Victory Slate" campaign account once it was in his personal account.

**COUNT EIGHTEEN**

Theft Scheme: \$1,500 to Under \$25,000

Checks made out to BCVS cashed in personal bank account

138. On or about May 2, 2018 at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, pursuant to one scheme and continuing course of conduct, steal \$4,300.00 from the "Baltimore County Victory Slate", by depositing checks made payable to the "Baltimore County Victory Slate" into his personal bank account, having a value of, at least \$1,500 but less than \$25,000, in violation of Criminal Law Article, § 7-104 of the *Annotated Code of Maryland* and against the peace, government, and dignity of the State.

**CR 7-104**

**CJIS Code 1-1160**

**Penalty: 5 years and/or \$10,000**

### **VENDOR CHECKS**

139. The State incorporates paragraphs 1 – 20; paragraphs 22 – 35; paragraphs 37 – 51; paragraphs 53 – 59; paragraphs 61 – 66; paragraphs 68 – 86; paragraphs 88 – 94; paragraphs 104 – 118; paragraphs 120 – 128; and paragraphs 130 – 137 of this Information as though fully set forth herein.

140. As part of his duties as Treasurer, MCCOLLUM was responsible for writing checks to vendors who worked with one of the campaign finance entities associated with the “Baltimore County Victory Slate”.

141. From on or about May 27, 2015, through and including August 8, 2016, MCCOLLUM wrote checks to several purported campaign vendors on behalf of the “Baltimore County Victory Slate”, but instead of delivering the checks to the vendors he deposited \$20,123.15 worth of the checks in his own personal bank account.

142. For example, on or about June 2, 2015, MCCOLLUM deposited a check made payable to “PF LLC” for \$3,500 into his personal bank account.

143. The members of the slate did not know about this deposit. The members of the slate did not approve this deposit.

144. For example, on or about July 6, 2015, MCCOLLUM deposited a check made payable to “NGP” for \$5,250 into his personal bank account.

145. The members of the slate did not know about this deposit. The members of the slate did not approve this deposit.

146. MCCOLLUM depositing the checks into his personal bank account was not recorded on the required reports for the “Baltimore County Victory Slate.”

**COUNT NINETEEN**

**Theft Scheme: \$1,500 to Under \$25,000  
BCVS False vendor checks**

148. On or about May 27, 2015 through and including August 8, 2016, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, pursuant to one scheme and continuing course of conduct, steal \$20,123.15 from the "Baltimore County Victory Slate", by writing checks to purported vendors of the "Baltimore County Victory Slate" from the "Baltimore County Victory Slate" bank account in his capacity as Treasurer, but depositing those checks in his personal bank account, having a value of at least \$1,500 but less than \$25,000, in violation of Criminal Law Article, § 7-104 of the *Annotated Code of Maryland* and against the peace, government, and dignity of the State.

**CR 7-104**

**CJIS Code 1-1160**

**Penalty: 5 years and/or \$10,000**

**VI. CFRs: BALTIMORE COUNTY VICTORY SLATE**

149. The State incorporates paragraphs 1 – 20; paragraphs 22 – 35; paragraphs 37 - 51; paragraphs 53 – 59; paragraphs 61 – 66; paragraphs 68 – 86; paragraphs 88 – 94; paragraphs 104 – 118; paragraphs 120 – 128; paragraphs 130 – 137; and paragraphs 139 – 146 of this Information as though fully set forth herein..

150. The campaign finance reports for the "Baltimore County Victory Slate" were signed by MCCOLLUM under the penalty of perjury and submitted by MCCOLLUM while he was in Baltimore County, Maryland.

151. MCCOLLUM had sole signatory authority on the "Baltimore County Victory Slate" Bank of America account.

**COUNT TWENTY**  
Perjury/ Affidavit Required by Law  
BCVS 2016 Pre-General 1

152. On January 20, 2021 at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, in an affidavit required by law to be taken, to wit: the amended 2016 Pre General 1 campaign finance report for "Baltimore County Victory Slate," required by Election Law Article §13-304, willfully and falsely make an affirmation under penalties of perjury that the report and accompanying schedules were complete and accurate, the matters so sworn being material, in violation of Criminal Law Article, § 9-101 of the *Annotated Code of Maryland*, and against the peace, government and dignity of the State.

**CR 9-101**  
**CJIS Code 1-0307**  
**Penalty: 10 years**

**COUNT TWENTY-ONE**  
Perjury/ Affidavit Required by Law  
BCVS 2018 Pre-Primary 2


153. On January 20, 2021, at Baltimore County, Maryland, WILLIAM CHRISTOPHER MCCOLLUM did, in an affidavit required by law to be taken, to wit: the amended 2018 Pre-Primary 2 campaign finance report for "Baltimore County Victory Slate," required by Election Law Article §13-304, willfully and falsely make an affirmation under penalties of perjury that the report and accompanying schedules were complete and accurate, the matters so sworn being material, in violation of Criminal Law Article, § 9-101 of the *Annotated Code of Maryland*, and against the peace, government and dignity of the State.

**CR 9-101**  
**CJIS Code 1-0307**  
**Penalty: 10 years**



Respectfully submitted,

*/s/ Charlton T. Howard*  
Charlton T. Howard III  
State Prosecutor  
charlton.howard@maryland.gov  
AIS: 8812150306



Sarah R. David  
Deputy State Prosecutor  
sarah.david@maryland.gov  
AIS: 1312170202  
Office of the State Prosecutor  
Suite 410, Hampton Plaza  
300 E. Joppa Road  
Towson, Maryland 21286  
(410) 321-4067

**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.

**C-03-CR-23-000803**

STATE OF MARYLAND VS. WILLIAM CHRISTOPHER MCCOLLUM

PID#:

UID#:

D.O.B.: 08/25/1970

DESCRIPTION:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Address:

[REDACTED]

District Court Case No.: N/A

State Tracking No.: 227003002811

Police Report No.: OSP

Citations Charged:

Bail Status: ISSUE SUMMONS

William Christopher McCollum  
c/o David Irwin, Esquire  
Kramon & Graham, P.A.  
One South Street, Suite 2600  
Baltimore, MD 21202-3201

**CRIMINAL INFORMATION**

Co-Defendant(s): n/a

Entered: Clerk, Circuit Court for  
Baltimore County, MD  
February 16, 2023