

STATE OF MARYLAND

*

IN THE

V.

*

CIRCUIT COURT FOR

JAMEL R. FRANKLIN

*

ANNE ARUNDEL COUNTY

Defendant

*

CASE NO.:

* * * * *

CRIMINAL INFORMATION

THE STATE PROSECUTOR for the State of Maryland, informs and charges, JAMEL R. FRANKLIN 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. The Treasurer is responsible for receiving and depositing all contributions into, and dispersing funds from, the campaign entity’s bank account. The Treasurer is also required to keep a detailed account book of all assets received, expenditures made, and obligations incurred on behalf of the campaign entity.

5. A campaign finance entity may not receive or disburse money or anything of value unless the political committee has a Treasurer.

6. A candidate may not act as the Treasurer of the candidate's own campaign finance entity.

7. A Chairperson may, in certain circumstances, approve a disbursement from a campaign finance entity, but not if the Chairperson is the candidate of the entity.

8. To ensure transparency and accountability in campaign finance entities, Campaign Finance Law requires a campaign finance entity to file electronic campaign finance reports with the State Board of Elections through the Board's software at least once a year and as many as six times a year in an election year and to be signed by the campaign finance entity's Treasurer or Chairperson under penalty of perjury.

9. Campaign Finance Law requires a campaign finance report to provide for the reporting period a beginning and ending bank balance, to list by donor's name and amount all contributions received, to enumerate all expenditures, including reimbursements, and to disclose all loans made to the campaign finance entity.

II. FRIENDS OF MEL FRANKLIN

10. The State incorporates paragraphs 1 – 9 of this Information as though fully set forth herein.

11. Jamel R. Franklin (hereafter "FRANKLIN") is an attorney licensed to practice law in the State of Maryland since 2001 and a resident of Prince George's County.

12. In 2009, FRANKLIN began a campaign to be elected to represent District 9 on the Prince George's County Council.

13. On January 9, 2009, Franklin caused “Friends of Mel Franklin,” a political committee to promote his candidacy, to be formed. As a political committee, “Friends of Mel Franklin” is regulated by Title 13 of the Election Law Article.

14. From January 9, 2009 through approximately December 7, 2009, Individual 1 was listed as the Treasurer of the Friends of Mel Franklin political committee with the State Board of Elections. On December 7, 2009, Individual 1 resigned as Treasurer, and Individual 2 was listed as the Treasurer of the Friends of Mel Franklin political committee with the State Board of Elections.

15. On January 12, 2009, Franklin and Individual 1 opened a bank account ending in 0017 in the name of “Friends of Mel Franklin” at Capital One Bank (formerly Chevy Chase Bank) with both FRANKLIN and Individual 1 as signatories.

16. In December 2009, when Individual 1 resigned as Treasurer and Individual 2 was named as Treasurer of the Friends of Mel Franklin account, Individual 2 was never added as a signatory to the Friends of Mel Franklin account, and FRANKLIN was the sole person with access to the account.

19. On October 7, 2020, Capital One Bank closed the Friends of Mel Franklin account ending in 0017 because the account had a negative balance.

20. On December 14, 2020, FRANKLIN opened a new bank account ending in 9446 in the name of “Friends of Mel Franklin” at Truist Bank (formerly BB&T Bank). FRANKLIN was and is the sole signatory on the account ending 9446; Individual 2, held out as the Treasurer for the Friends of Mel Franklin political committee, has never been an authorized signer on the account.

21. FRANKLIN established a PayPal account for himself personally and for Friends of Mel Franklin; FRANKLIN had sole control over both PayPal accounts.

22. Since at least 2010, FRANKLIN has acted as the Treasurer of the Friends of Mel Franklin political committee and has been responsible for all finances related to the committee.

23. Beginning on January 9, 2009 through at least April 2024, FRANKLIN was listed as the Chairperson of the Friends of Mel Franklin political committee.

24. The Chairperson of the Friends of Mel Franklin political committee serves as a fiduciary of the entity.

25. 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. As Chairperson, FRANKLIN had a duty to ensure that campaign finance reports that were filed with the State Board of Elections, under the penalties of perjury, accurately reported all contributions and expenditures made to or from the Friends of Mel Franklin bank accounts.

26. FRANKLIN had no authority to utilize the money in the Friends of Mel Franklin bank accounts for his personal use or benefit.

III. PAYMENTS TO THIRD PARTIES

27. The State incorporates paragraphs 1 – 26 of this Information as though fully set forth herein.

28. FRANKLIN had a personal bank account ending in 7215 in his own name at Capital One Bank. FRANKLIN also maintained credit and debit cards in his own name.

29. From approximately March 26, 2022, through and including December 18, 2023, FRANKLIN used funds in the Friends of Mel Franklin account at Truist Bank to pay \$8,718.57 to

third parties for purchases that were not related to his campaign for Prince George's County Council.

30. For example, on or about April 3, 2022, FRANKLIN transferred \$382.14 from the Friends of Mel Franklin political committee's PayPal account to a close personal friend, and made an additional transfer of \$214.17 from the Friends of Mel Franklin bank account to a close personal friend's PayPal account. These transfers were neither related to FRANKLIN's campaign for Prince George's County Council nor legitimate expenditures of the Friends of Mel Franklin political committee.

31. For example, on or about July 10, 2022, FRANKLIN used \$305.62 from the Friends of Mel Franklin bank account to stay in a hotel room at the Westin Hotel, National Harbor, Maryland. FRANKLIN checked into the hotel at 2:01 a.m., and checked out of the hotel at 6:21 a.m. This purchase was not related to FRANKLIN's campaign for Prince George's County Council nor a legitimate expenditure of the Friends of Mel Franklin political committee.

32. For example, on or about March 3, 2023, FRANKLIN used the debit card associated with the Friends of Mel Franklin bank account to pay \$500 to a medical facility for cosmetic medical procedures for a close personal friend. This purchase was neither related to FRANKLIN's campaign for Prince George's County Council nor a legitimate expenditure of the Friends of Mel Franklin political committee.

33. For example, on March 26, 2023, FRANKLIN used \$807.74 from the Friends of Mel Franklin bank account to purchase a one-night stay in an executive suite at the Gaylord National hotel through Booking.com. This purchase was neither related to FRANKLIN's campaign for Prince George's County Council nor a legitimate expenditure of the Friends of Mel Franklin political committee.

34. For example, on June 16, 2023, FRANKLIN used \$153.75 from the Friends of Mel Franklin bank account to pay an auto care shop for an oil change on his personal vehicle. This purchase was neither related to FRANKLIN's campaign for Prince George's County Council nor a legitimate expenditure of the Friends of Mel Franklin political committee.

35. For example, on August 7, 2023, FRANKLIN paid his personal credit card balance of \$2,406.59 with Merrick Bank by transferring \$2,406.59 to Merrick Bank from the Friends of Mel Franklin political committee's bank account. This payment was neither related to FRANKLIN's campaign for Prince George's County Council nor a legitimate expenditure of the Friends of Mel Franklin political committee.

36. For example, on August 24, 2023, FRANKLIN used funds from the Friends of Mel Franklin political committee's Truist bank account to make a deposit of \$218 on an international trip for himself and a close personal friend. This trip was neither related to FRANKLIN's campaign for Prince George's County Council nor a legitimate expenditure of the Friends of Mel Franklin political committee.

COUNT ONE

Embezzlement – Misappropriation by a Fiduciary Payments to Third Parties from the Friends of Mel Franklin Bank Account

37. From March 26, 2022 through and including December 18, 2023, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN, being a fiduciary of the political committee known as "Friends of Mel Franklin," did fraudulently and willfully appropriate to a use contrary to his trust, money held by him in his fiduciary capacity, to wit: FRANKLIN, being the duly appointed Chairperson for the political committee "Friends of Mel Franklin," 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, made payments of \$8,718.57 to third-parties for

his personal use and benefit, unrelated to the Friends of Mel Franklin political committee, 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

COUNT TWO

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

Payments to Third Parties from the Friends of Mel Franklin Bank Account

38. On or about March 26, 2022 through and including December 18, 2023, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, pursuant to one scheme and continuing course of conduct, steal \$8,718.57 from the Friends of Mel Franklin political committee's bank account in the form of payments to third-parties for his personal use and benefit, 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 1-1136

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

IV. PAYMENTS TO JAMEL FRANKLIN

39. The State incorporates paragraphs 1 – 36 of this Information as though fully set forth herein.

40. Throughout his time serving as Chairperson for the Friends of Mel Franklin political committee, FRANKLIN used funds for personal use that were required to be used solely for the furtherance of campaign activities.

41. FRANKLIN held fundraising and campaign events where he collected contributions from donors. Those donations were to be deposited into the Friends of Mel Franklin

political committee bank account. The law restricts candidates' access to funds held by their political committee, and the responsibility for depositing funds and making expenditures lies with the Treasurer.

42. From on or about April 2014, through and including October 2023, FRANKLIN transferred money via check or Zelle to his personal bank account ending in 7215 at Capital One Bank, from the Friends of Mel Franklin bank accounts, which funds had been received from donors and deposited into the Friends of Mel Franklin bank accounts at Capital One Bank and Truist Bank. FRANKLIN used the funds to pay for personal expenses, including cosmetic procedures, travel for himself and his close personal friend, his personal rent, re-payments of personal loans, and payments of personal credit card debt.

43. For example, on January 25, 2021, FRANKLIN deposited \$22,215 in checks from the Friends of Mel Franklin bank account ending in 9446 at Truist Bank into his personal bank account at Capital One Bank.

44. On January 26, 2021, FRANKLIN electronically transferred \$2,000 from the Friends of Mel Franklin bank account ending in 9446 at Truist Bank to his personal account and deposited a \$1,000 check drawn on the Friends of Mel Franklin campaign bank account ending in 9446 at Truist Bank into his personal account.

45. Between January 25 and January 28, 2021, FRANKLIN used over \$12,000 of the funds transferred into his personal account to pay a personal loan, transfer funds into his personal savings account, make a purchase from a liquor store, and make payments to an online subscription service, among other things. FRANKLIN would not have had sufficient funds in his personal bank account to make these purchases, but for the transfers from the Friends of Mel Franklin bank account.

46. For example, on March 1, 2023, FRANKLIN transferred \$3,000 from the Friends of Mel Franklin bank account ending in 9446 at Truist Bank to his personal bank account. Shortly thereafter, FRANKLIN transferred another \$2,000 from the campaign Truist account to his personal account.

47. On March 3, 2023, FRANKLIN used \$4,500 from his personal account to pay a medical facility for personal cosmetic procedures. FRANKLIN would not have had sufficient funds in his personal bank account to make this payment, but for the transfers from the Friends of Mel Franklin bank account.

48. For example, on March 28, 2023, FRANKLIN transferred \$3,000 from the Friends of Mel Franklin bank account ending in 9446 at Truist Bank to his personal bank account. The same day, FRANKLIN spent \$4,000 at a medical facility to pay for cosmetic procedures. On March 28 and March 29, 2023, FRANKLIN electronically transferred \$2,640 from the Friends of Mel Franklin account to his personal bank account.

49. On March 29, 2023, FRANKLIN made a \$3,000 payment from his personal bank account to a medical facility for cosmetic procedures. FRANKLIN would not have had sufficient funds in his personal bank account to make these payments, but for the transfers from the Friends of Mel Franklin bank account.

50. For example, on June 8, 2023, FRANKLIN transferred \$2,100 from the Friends of Mel Franklin bank account ending in 9446 at Truist Bank to his personal bank account.

51. The next day, June 9, 2023, FRANKLIN made a \$2,306.32 payment to pay for his personal rent. FRANKLIN would not have had sufficient funds in his personal bank account to make this payment, but for the transfers from the Friends of Mel Franklin bank account.

52. For example, on August 5, 2023, FRANKLIN made transfers of \$1,000 and \$500 from the Friends of Mel Franklin bank account ending in 9446 at Truist Bank to his personal bank account.

53. On August 7, 2023, FRANKLIN made a payment of \$2,291.21 to pay for his personal rent. FRANKLIN would not have had sufficient funds in his personal bank account to make this payment, but for the transfers from the Friends of Mel Franklin bank account.

54. For example, on September 5, 2023, FRANKLIN transferred \$2,300 from the Friends of Mel Franklin bank account ending in 9446 at Truist Bank to his personal bank account. On September 6, 2023, FRANKLIN electronically transferred \$940 and \$550 from the Friends of Mel Franklin bank account to his personal bank account.

55. On September 7, 2023, FRANKLIN made a payment of \$2,288.34 to pay for his personal rent. FRANKLIN would not have had sufficient funds in his personal bank account to make this payment, but for the transfers from the Friends of Mel Franklin bank account.

56. The transfers from the Friends of Mel Franklin political committee's bank account to FRANKLIN's personal bank account were not all recorded on the reports submitted by FRANKLIN to the State Board of Elections under the penalties of perjury.

COUNT THREE

Embezzlement – Misappropriation by a Fiduciary Payments to Jamel R. Franklin from the Friends of Mel Franklin Bank Account

57. From in or about April 2014 through and including October, 2023, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN, being a fiduciary of the political committee known as "Friends of Mel Franklin," did fraudulently and willfully appropriate to a use contrary to his trust, money held by him in his fiduciary capacity, to wit: FRANKLIN, being the duly appointed Chairperson for the political committee "Friends of Mel Franklin," 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, made payments of \$124,450.10 to himself or 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

COUNT FOUR

Theft Scheme of \$100,000 or More

Payments to Jamel R. Franklin from the Friends of Mel Franklin Bank Account

58. In or about 2014 through and including October 2023, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, pursuant to one scheme and continuing course of conduct, steal \$124,450.10 from the “Friends of Mel Franklin” bank account, in the form of payments to FRANKLIN’s personal bank account, having a value of \$100,000 or more, 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 1-1134

Penalty: 20 years and/or \$25,000

V. CAMPAIGN FINANCE REPORTS (CFRs)

59. The State incorporates paragraphs 1 – 36 and 39 – 56 of this Information as though fully set forth herein.

60. 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.

61. 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.

62. The campaign finance reports are filed under the penalties of perjury and an electronic signature is required at the time of submission.

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

64. The reports are separate from the actual bank account for the Friends of Mel Franklin political committee, which was managed by FRANKLIN.

65. The reports for Friends of Mel Franklin political committee were filed by FRANKLIN and signed by FRANKLIN under the penalties of perjury and submitted to the State board of Elections in Anne Arundel County, Maryland.

66. The listed Treasurer for the Friends of Mel Franklin political committee did not sign a campaign report after 2011.

67. FRANKLIN signed all reports filed by the Friends of Mel Franklin political committee with the State Board of Elections.

68. Beginning in at least August 2019 through and including August 2023, FRANKLIN filed false campaign finance reports with the State Board of Elections, under the penalties of perjury, by inaccurately reporting contributions and expenditures made to or from the Friends of Mel Franklin bank accounts, loans made to the campaign finance committee, and the cash balance of the Friends of Mel Franklin bank account.

COUNT FIVE

Perjury/ Affidavit Required by Law
FOMF 2018 Annual Report (Amended)

69. On August 24, 2019, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the 2018 Annual campaign finance report (amended) for “Friends of Mel Franklin,” 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 SIX

Perjury/ Affidavit Required by Law
FOMF 2018 Pre-Primary 1 (Amended)

70. On August 24, 2019, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the amended 2018 Pre-Primary 1 campaign finance report (amended) for “Friends of Mel Franklin,” 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 SEVEN

Perjury/ Affidavit Required by Law
FOMF 2018 Pre-Primary 2 (Amended)

71. On August 24, 2019, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the amended 2018 Pre-Primary 2 campaign finance report (amended) for “Friends of Mel Franklin,” 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
FOMF 2018 Pre-General 1 (Amended)

72. On August 24, 2019, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the amended 2018 Pre-General 1 campaign finance report (amended) for “Friends of Mel Franklin,” 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
FOMF 2018 Pre-General 2 (Amended)

73. On August 24, 2019, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the amended 2018 Pre-General 2 campaign finance report (amended) for “Friends of Mel Franklin,” 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
FOMF 2018 Post-Gubernatorial (Amended)

74. On August 24, 2019, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the amended 2018 Post-Gubernatorial campaign finance report (amended) for “Friends of Mel Franklin,” 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
FOMF 2019 Annual (Amended)

75. On August 24, 2019, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the 2019 Annual campaign finance report (amended) for “Friends of Mel Franklin,” 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
FOMF 2020 Annual

76. On January 15, 2020, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the 2020 Annual campaign finance report for “Friends of Mel Franklin,” 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
FOMF 2021 Annual (Amended)

77. On August 12, 2023, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the 2021 Annual campaign finance report (amended) for “Friends of Mel Franklin,” 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
FOMF 2022 Annual (Amended)

78. On August 12, 2023, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the 2022 Annual campaign finance report (amended) for “Friends of Mel Franklin,” 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
FOMF 2022 Pre-Primary 1 (Amended)

79. On August 12, 2023, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the 2022 Pre-Primary 1 campaign finance report (amended) for “Friends of Mel Franklin,” 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 SIXTEEN

Perjury/ Affidavit Required by Law
FOMF 2022 Pre-Primary 2 (Amended)

80. On August 12, 2023, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the 2022 Pre-Primary 2 campaign finance report (amended) for “Friends of Mel Franklin,” 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 SEVENTEEN

Perjury/ Affidavit Required by Law
FOMF 2022 Pre-General 1 (Amended)

81. On August 12, 2023, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the 2022 Pre-General 1 campaign finance report (amended) for “Friends of Mel Franklin,” 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 EIGHTEEN

Perjury/ Affidavit Required by Law
FOMF 2022 Pre-General 2 (Amended)

82. On August 12, 2023, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the 2022 Pre-General 2 campaign finance report (amended) for “Friends of Mel Franklin,” 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 NINETEEN

Perjury/ Affidavit Required by Law
FOMF 2022 Post-Gubernatorial (Amended)

83. On August 12, 2023, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the 2022 Post-Gubernatorial campaign finance report (amended) for “Friends of Mel Franklin,” 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

Perjury/ Affidavit Required by Law
FOMF 2023 Annual (Amended)

84. On August 12, 2023, at Anne Arundel County, Maryland, JAMEL R. FRANKLIN did, in an affidavit required by law to be taken, to wit: the 2023 Annual campaign finance report (amended) for “Friends of Mel Franklin,” 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

