STATE OF MARYLAND IN THE **CIRCUIT COURT FOR**

V.

DONTAE D. ODOM

CECIL COUNTY

Defendant CASE NO.: C-07-CR-25-000457

CRIMINAL INFORMATION

The State Prosecutor for the State of Maryland informs and charges the Defendant, DONTAE D. ODOM, with having committed the following offenses:

I. INTRODUCTION AND BACKGROUND

At all times relevant to this Information:

- DONTAE D. ODOM ("ODOM") was born in 1989. ODOM has served as a sworn 1. law enforcement officer employed with the Cecil County Sheriff's Office (the "CCSO") since approximately July 2016.
- 2. From July 2016 to December 2018, ODOM was a Deputy in the Cecil County Detention Center. Beginning in January 2019, ODOM was a sworn Patrol Officer with the CCSO.
- 3. ODOM attended and graduated from the Harford County Sheriff's Office Training Academy in 2019.
- 4. As a Deputy with the CCSO, ODOM was assigned a unique login to access the Maryland Electronic Telecommunications Resource System ("METERS") which serves as a gateway to access confidential law enforcement databases, including the National Crime Information Center ("NCIC"), Criminal Justice Information Services ("CJIS"), and Maryland Criminal Justice Dashboard ("Dashboard").

- 5. NCIC is maintained by the CJIS Division of the Federal Bureau of Investigation ("FBI") and serves as a central database for tracking crime-related information to facilitate the sharing of data among criminal justice agencies.
- 6. In Maryland, NCIC users access NCIC through METERS. Users of NCIC access the NCIC computer located at FBI headquarters through regional or State computer systems or with direct tie-ins to the NCIC computer.
- 7. Dashboard is a system maintained by the Maryland Department of Public Safety and Correctional Services ("DPSCS") that allows authorized criminal justice personnel to access and view confidential information from various law enforcement data sources.
- 8. The same login information a user must enter to access METERS is also used to access NCIC and Dashboard.
- 9. The use of NCIC requires a mandatory certification for all individuals who enter, retrieve, or manage information within the NCIC database.
- 10. After being initially certified, users of NCIC are required to recertify every two years. Certification and recertification require that users take a class and pass a test. ODOM was certified in the use of NCIC while attending the Harford County Sheriff's Office Training Academy in 2019, and ODOM was subsequently recertified with the CCSO in 2021 and 2023.
- 11. Attendees of the CCSO NCIC recertification class are advised verbally, in writing, and by a PowerPoint Presentation, that access to law enforcement databases is limited to records required for the performance of law enforcement officers' jobs, and that users cannot look up information for personal use or search information associated with family or friends. Likewise, there is a related question on the recertification tests that users must pass.

- 12. Similarly, the handout provided to the attendees of the CCSO NCIC recertification class states that, "Obtaining and misusing information from NCIC whether intentional or accidental can carry Administrative and Criminal Penalties."
- 13. The login page of Dashboard requires a user to enter their unique user ID and password, and states: "UNATHORIZED ACCESS TO THIS COMPUTER IS IN VIOLATION OF SECTIONS 7-302 AND 8-606 OF THE CRIMINAL LAW ARTICLE, ANNOTATED CODE OF MARYLAND. THIS SYSTEM IS BEING MONITORED. ANYONE USING THIS SYSTEM EXPRESSLY CONSENTS TO SUCH MONITORING."
- 14. After users enter their login information into Dashboard, they must "accept" the following information before accessing the confidential database:

"By using this site, you acknowledge that: The Maryland Criminal Justice Dashboard is available to users; employed by full access and/or query only criminal justice agencies, with current National Crime Information Center (NCIC) Terminal Operator Certifications. Information obtained via the Dashboard must be treated in accordance with NCIC rules and regulations. The unauthorized use of the NCIC logon to access the Dashboard, or a breach of any security procedures related to the use of the NCIC logon may result in prosecution under federal and state law."

- 15. Additionally, Section 2.31 of CCSO's Code of Conduct, incorporated into CCSO's Policies and Procedures, and which applies to all CCSO employees, states: "Sheriff's Office personnel/employees are prohibited from using or assisting in the use of the ... NCIC or CJIS system for personal reasons or for any other purpose prohibited by State and Federal statute."
- 16. Chapter 26 of CCSO's Policies and Procedures is titled "Mobile Data Terminals," known as "MDTs." MDTs include CCSO issued laptops to all deputies, including ODOM.

- 17. Chapter 26 of CCSO's Policies and Procedures states that, "All MDT's, data and software, maintained or used by the Cecil County Sheriff's Office is for official use only. Deputy Sheriffs will not use or cause to be used any MDT for personal gain or benefit of any kind" and that "Deputy Sheriffs may not access information concerning individuals who are not subject to legitimate police inquires."
- 18. Chapter 26 of CCSO's Policies and Procedures further states that responses from inquiries to CJIS/NCIC/METERS are protected information and that "Deputy Sheriffs are not permitted to use these systems for their own use or purposes. Information received through these computer systems may only be used for official criminal justice purposes. Deputy Sheriffs will not initiate any inquiry outside those purposes necessary to complete a law enforcement or agency objective."
- 19. Chapter 26 of CCSO's Policies and Procedures advises CCSO employees that, "Violations of prohibitions may result in disciplinary action or criminal prosecution."

II. <u>VICTIM 1</u>

- 20. Paragraphs 1 through 19 of this Information are incorporated as though fully set forth herein.
- 21. At all times relevant hereto, ODOM was married to and resided or partially resided with VICTIM 1.

COUNT ONE (Misconduct in Office)

22. On or about March 13, 2024, at Cecil County, Maryland, DONTAE D. ODOM, in violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 1 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT TWO

(Misconduct in Office)

23. On or about May 30, 2024, at Cecil County, Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 1 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT THREE

(Unauthorized Access to Computers)

24. On or about May 30, 2024, at Cecil County, Maryland, DONTAE D. ODOM, did

intentionally, willfully, and without authorization, exceed authorized access to a computer database

and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302, and against

the peace, government, and dignity of the state.

Crim. Law $\S7-302(c)(1)(i)$

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

COUNT FOUR

(Misconduct in Office)

25. On or about June 2, 2024, at Cecil County, Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 1 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

26.

Penalty: Anything not cruel and unusual

COUNT FIVE

(Unauthorized Access to Computers)

On or about June 2, 2024, at Cecil County, Maryland, DONTAE D. ODOM, did

intentionally, willfully, and without authorization, exceed authorized access to a computer database

and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302, and against

the peace, government, and dignity of the state.

Crim. Law $\S7-302(c)(1)(i)$

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

COUNT SIX

(Misconduct in Office)

27. On or about June 5, 2024, at Cecil County, Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 1 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT SEVEN

(Unauthorized Access to Computers)

28. On or about June 5, 2024, at Cecil County, Maryland, DONTAE D. ODOM, did

intentionally, willfully, and without authorization, exceed authorized access to a computer database

and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302, and against

the peace, government, and dignity of the state.

Crim. Law §7-302(c)(1)(i)

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

COUNT EIGHT

(Misconduct in Office)

29. On or about June 7, 2024, at Cecil County, Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 1 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT NINE

(Unauthorized Access to Computers)

30. On or about June 7, 2024, at Cecil County, Maryland, DONTAE D. ODOM, did

intentionally, willfully, and without authorization, exceed authorized access to a computer database

and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302, and against

the peace, government, and dignity of the state.

Crim. Law $\S7-302(c)(1)(i)$

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

COUNT TEN

(Misconduct in Office)

31. On or about June 10, 2024, at Cecil County, Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 1 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

32.

Penalty: Anything not cruel and unusual

COUNT ELEVEN

(Unauthorized Access to Computers)

On or about June 10, 2024, at Cecil County, Maryland, DONTAE D. ODOM, did

intentionally, willfully, and without authorization, exceed authorized access to a computer database

and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302, and against

the peace, government, and dignity of the state.

Crim. Law §7-302(c)(1)(i)

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

COUNT TWELVE

(Misconduct in Office)

33. On or about June 11, 2024, at Cecil County, Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 1 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT THIRTEEN

(Unauthorized Access to Computers)

34. On or about June 11, 2024, at Cecil County, Maryland, DONTAE D. ODOM, did

intentionally, willfully, and without authorization, exceed authorized access to a computer database

and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302, and against

the peace, government, and dignity of the state.

Crim. Law $\S7-302(c)(1)(i)$

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

COUNT FOURTEEN

(Misconduct in Office)

35. On or about June 12, 2024, at Cecil County, Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 1 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT FIFTEEN

(Unauthorized Access to Computers)

36. On or about June 12, 2024, at Cecil County, Maryland, DONTAE D. ODOM, did

intentionally, willfully, and without authorization, exceed authorized access to a computer database

and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302, and against

the peace, government, and dignity of the state.

Crim. Law §7-302(c)(1)(i)

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

COUNT SIXTEEN

(Misconduct in Office)

37. On or about June 13, 2024, at Cecil County, Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 1 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT SEVENTEEN

(Unauthorized Access to Computers)

38. On or about June 13, 2024, at Cecil County, Maryland, DONTAE D. ODOM, did

intentionally, willfully, and without authorization, exceed authorized access to a computer database

and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302, and against

the peace, government, and dignity of the state.

Crim. Law §7-302(c)(1)(i)

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

COUNT EIGHTEEN

(Misconduct in Office)

39. On or about December 30, 2024, at Cecil County, Maryland, DONTAE D. ODOM,

in violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 1 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT NINETEEN

(Unauthorized Access to Computers)

40. On or about December 30, 2024, at Cecil County, Maryland, DONTAE D. ODOM,

did intentionally, willfully, and without authorization, exceed authorized access to a computer

database and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302,

and against the peace, government, and dignity of the state.

Crim. Law $\S7-302(c)(1)(i)$

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

COUNT TWENTY

(Misconduct in Office)

41. On or about January 4, 2025, at Cecil County, Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and a accessing confidential law enforcement database, Dashboard, for

information concerning VICTIM 1 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT TWENTY-ONE

(Unauthorized Access to Computers)

42. On or about January 4, 2025, at Cecil County, Maryland, DONTAE D. ODOM, did

intentionally, willfully, and without authorization, exceed authorized access to a computer database

and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302, and against

the peace, government, and dignity of the state.

Crim. Law §7-302(c)(1)(i)

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

III. VICTIMS 2 AND 3

43. Paragraphs 1 through 21 of this Information are incorporated as though fully set

forth herein.

44. Beginning in approximately 2021, ODOM was in romantic relationship with

VICTIM 2.

45. Beginning in 2022, ODOM resided or partially resided with VICTIM 2.

46. VICTIM 3 is VICTIM 2's family member.

COUNT TWENTY-TWO

(Misconduct in Office)

47. On or about February 6, 2024, at Cecil County Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 3 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT TWENTY-THREE

(Misconduct in Office)

48. On or about February 18, 2024, at Cecil County Maryland, DONTAE D. ODOM,

in violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 2 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law **CJIS Code 2-0645**

Penalty: Anything not cruel and unusual

COUNT TWENTY-FOUR

(Misconduct in Office)

49. On or about February 27, 2024, at Cecil County Maryland, DONTAE D. ODOM,

in violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 3 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT TWENTY-FIVE

(Misconduct in Office)

50. On or about March 3, 2024, at Cecil County Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 2 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT TWENTY-SIX

(Misconduct in Office)

51. On or about March 3, 2024, at Cecil County Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 3 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law **CJIS Code 2-0645**

Penalty: Anything not cruel and unusual

COUNT TWENTY-SEVEN

(Misconduct in Office)

52. On or about March 5, 2024, at Cecil County Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 2 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT TWENTY-EIGHT

(Misconduct in Office)

53. On or about March 11, 2024, at Cecil County Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 2 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT TWENTY-NINE

(Misconduct in Office)

54. On or about March 14, 2024, at Cecil County Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 2 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT THIRTY

(Misconduct in Office)

55. On or about March 14, 2024, at Cecil County Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, NCIC, for

information concerning VICTIM 2 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT THIRTY-ONE

(Misconduct in Office)

56. On or about March 15, 2024, at Cecil County Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 2 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT THIRTY-TWO

(Misconduct in Office)

57. On or about March 21, 2024, at Cecil County Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 2 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT THIRTY-THREE

(Misconduct in Office)

58. On or about June 10, 2024, at Cecil County Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 2 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT THIRTY-FOUR

(Unauthorized Access to Computers)

59. On or about June 10, 2024, at Cecil County, Maryland, DONTAE D. ODOM, did intentionally, willfully, and without authorization, exceed authorized access to a computer database and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302, and against the peace, government, and dignity of the state.

Crim. Law §7-302(c)(1)(i)

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

IV. VICTIMS 4, 5, and 6

- 60. Paragraphs 1 through 21 and 43 through 46 of this Information are incorporated as though fully set forth herein.
- 61. VICTIM 4 worked in the same building where the Cecil County Sheriff's Office is located.
- 62. From approximately August 2024 until at least December 2024, ODOM was in romantic relationship with VICTIM 4.
 - 63. At all times relevant hereto, VICTIM 4 was married to VICTIM 5.
- 64. On September 13, 2024, ODOM texted VICTIM 4 that he "looked [her] up." VICTIM 4 asked how ODOM looked her up, and stated "Just making sure you didn't look up my address in ncic." In response, ODOM texted VICTIM 5, "Umm no that[s] stalking and everything is tracked. I'm not getting fired for that."
- 65. Two days later, on September 15, 2024, ODOM used his unique login information to search VICTIM 4's name on Dashboard. There was no lawful reason for ODOM to search VICTIM 4's name.

- 66. Also on September 15, 2024, ODOM used his unique login information to search VICTIM 5's last name and the first letter of VICTIM 5's first name on Dashboard. ODOM conducted a third search on September 15, 2024, of VICTIM 5's last name and the first two letters of VICTIM 5's first name on Dashboard. There was no lawful reason for ODOM to search VICTIM 5's name.
- 67. On November 16, 2024, ODOM was off duty and traveled to Ocean City, Maryland with VICTIM 4. While there and in the presence of VICTIM 4, ODOM used his unique login information to search a license plate on Dashboard, associated with VICTIM 6, an employee at the hotel where VICTIM 4 and ODOM were staying. There was no lawful reason for ODOM to search VICTIM 6's license plate.
- 68. On December 12, 2024, ODOM was notified that there was a criminal investigation into his conduct.
- 69. Also on December 12, 2024, CCSO served ODOM with a "No-Contact Order", prohibiting him from having any contact with VICTIM 4 and others while the investigation was ongoing.
- 70. From approximately March 8, 2025 through at least June 17, 2025, ODOM had contact with VICTIM 4 through text message, email, and social media messaging.
- 71. On approximately March 9, 2025, ODOM met VICTIM 4 in person at a secluded location. ODOM asked VICTIM 4 if VICTIM 4 was recording their meeting, and VICTIM 4 stated that she was not. VICTIM 4 asked ODOM if he was recording their meeting, to which ODOM told VICTIM 4 that he was not.
- 72. ODOM recorded the audio of the March 9, 2025 meeting with VICTIM 4, without her knowledge or consent.

COUNT THIRTY-FIVE

(Misconduct in Office)

73. On or about September 15, 2024, at Cecil County Maryland, DONTAE D. ODOM,

in violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 4 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT THIRTY-SIX

(Unauthorized Access to Computers)

74. On or about September 15, 2024, at Cecil County, Maryland, DONTAE D. ODOM,

did intentionally, willfully, and without authorization, exceed authorized access to a computer

database and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302,

and against the peace, government, and dignity of the state.

Crim. Law $\S7-302(c)(1)(i)$

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

COUNT THIRTY-SEVEN

(Misconduct in Office)

75. On or about September 15, 2024, at Cecil County Maryland, DONTAE D. ODOM,

in violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 5 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT THIRTY-EIGHT

(Unauthorized Access to Computers)

76. On or about September 15, 2024, at Cecil County, Maryland, DONTAE D. ODOM,

did intentionally, willfully, and without authorization, exceed authorized access to a computer

database and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302,

and against the peace, government, and dignity of the state.

Crim. Law §7-302(c)(1)(i)

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

COUNT THIRTY-NINE (Misconduct in Office)

77. On or about November 16, 2024, at Cecil County Maryland, DONTAE D. ODOM,

in violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 6 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT FORTY

(Unauthorized Access to Computers)

78. On or about November 16, 2024, at Cecil County, Maryland, DONTAE D. ODOM,

did intentionally, willfully, and without authorization, exceed authorized access to a computer

database and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302,

and against the peace, government, and dignity of the state.

Crim. Law $\S7-302(c)(1)(i)$

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

COUNT FORTY-ONE

(Misconduct in Office)

79. On or about December 4, 2024, at Cecil County Maryland, DONTAE D. ODOM,

in violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 4 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law **CJIS Code 2-0645**

Penalty: Anything not cruel and unusual

COUNT FORTY-TWO

(Unauthorized Access to Computers)

80. On or about December 4, 2024, at Cecil County, Maryland, DONTAE D. ODOM,

did intentionally, willfully, and without authorization, exceed authorized access to a computer

database and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302,

and against the peace, government, and dignity of the state.

Crim. Law §7-302(c)(1)(i)

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

COUNT FORTY-THREE

(Unlawful Interception of Communications)

81. On or about March 9, 2025, at Cecil County, Maryland, DONTAE D. ODOM did

willfully intercept an oral communication using his cell phone as a surreptitious recording device,

without the knowledge or consent of the intercepted parties, and recorded a conversation with

VICTIM 4, in violation of §10-402(a)(1) of the Courts and Judicial Proceedings Article and against

the peace, government and dignity of the State.

Cts. & Jud. Proc. §10-402(a)(1)

CJIS Code 1-5595

Penalty: Not exceeding 5 years and/or \$10,000

V. VICTIM 7

Paragraphs 1 through 21, 43 through 46, and 60 through 62 of this Information are 82.

incorporated as though fully set forth herein.

VICTIM 7 worked in the same building where the Cecil County Sheriff's Office is 83.

located.

84. VICTIM 7 and ODOM exchanged phone numbers sometime between 2017 and

2019.

85. On July 6, 2024, ODOM used his used his unique login information to search

VICTIM 7's phone number on Dashboard. There was no lawful reason for ODOM to search

VICTIM 7's name.

COUNT FORTY-FOUR

(Misconduct in Office)

86. On or about July 6, 2024, at Cecil County Maryland, DONTAE D. ODOM, in

violation and perversion of his duties as a sworn law enforcement officer, did corruptly commit

misconduct in office by knowingly, willfully, and intentionally acting in his official capacity as a

law enforcement officer and accessing a confidential law enforcement database, Dashboard, for

information concerning VICTIM 7 who was not subject to a legitimate law enforcement inquiry,

in violation of the Common Law of Maryland and against the peace, government, and dignity of

the State.

Common Law

CJIS Code 2-0645

Penalty: Anything not cruel and unusual

COUNT FORTY-FIVE

(Unauthorized Access to Computers)

87. On or about July 6, 2024, at Cecil County, Maryland, DONTAE D. ODOM, did

intentionally, willfully, and without authorization, exceed authorized access to a computer database

and computer system, to wit, Dashboard, in violation of Md. Code, Crim. Law §7-302, and against

the peace, government, and dignity of the state.

Crim. Law §7-302(c)(1)(i)

CJIS Code 1-2804

Penalty: Not exceeding 3 years and/or \$1,000 fine

Charlton T. Howard, III Maryland State Prosecutor

By:

<u>/s/</u>

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