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

Dontae D. Odom ("ODOM") served as a Deputy for the Cecil County Sheriff's Office ("CCSO") from January 2019 through at least July 2025.

As a Deputy with the CCSO, ODOM was assigned a unique login to access 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").

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. Dashboard is a system maintained by the Maryland Department of Public Safety and Correctional Services that allows authorized criminal justice personnel to access and view confidential information from various law enforcement data sources.

The use of NCIC requires a mandatory certification for all individuals who enter, retrieve, or manage information within the NCIC database. 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 received his initial certification to use NCIC while attending the Harford County Sheriff's Office Training Academy in 2019, and was subsequently recertified with the CCSO in 2021 and 2023.

Attendees of the CCSO recertification class are advised verbally, and in writing on a handout and PowerPoint, 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.

Similarly, the handout provided to the attendees of the CCSO recertification class states that, "Obtaining and misusing information from NCIC whether intentional or accidental can carry Administrative and Criminal Penalties."

The same login information used to access NCIC is also used to access Dashboard. The login page of Dashboard requires a user to enter their unique login, states that all NCIC rules and regulations apply to Dashboard, and that: "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."

The CCSO had written Policies and Procedures (the "Policies") which served as published directives to all CCSO employees. Section 2.31 of CCSO's Code of Conduct, incorporated into

CCSO's Policies, 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." Additionally, Chapter 26 of the Policies is titled "Mobile Data Terminals," known as "MDTs." MDTs include CCSO issued laptops to all deputies, including ODOM. Chapter 26 of CCSO's Policies also 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." The Policies state that a violation of Chapter 26 "may result in … criminal prosecution."

I. VICTIM 1

Since in or around 2011, ODOM was married to VICTIM 1 and resided or partially resided with VICTIM 1. From March 13, 2024 through January 4, 2025, ODOM searched VICTIM 1's name on Dashboard on at least 11 separate dates, including on March 13, 2024. At no time during that period was there a legitimate law enforcement reason to search VICTIM 1's information.

II. VICTIMS 2 AND 3

In August 2021, ODOM responded to a call for service made by VICTIM 2 and her family member, VICTIM 3. Beginning in approximately October of 2021, ODOM started a romantic relationship with VICTIM 2. In June 2022, ODOM responded to another call for service made by VICTIM 2. Shortly thereafter, during the second half of 2022, ODOM and VICTIM 2 resided or partially resided with one another.

From April 1, 2022 through at least March 21, 2024, ODOM searched VICTIM 2's name on Dashboard on at least 16 different dates, including on February 18, 2024. On May 18, 2022 and March 14, 2024, ODOM searched VICTIM 2's name on NCIC. At no time during that period was there a legitimate law enforcement reason to search VICTIM 2's information.

From May 18, 2022 through at least June 10, 2024, ODOM searched VICTIM 3's (VICTIM 2's family member) name on Dashboard on at least five dates, including February 27, 2024. At no time during that period was there a legitimate law enforcement reason to search VICTIM 3's information.

II. VICTIMS 4, 5, AND 6

From approximately August 2024 through at least December 2024, ODOM was in a romantic relationship with VICTIM 4. During that time, VICTIM 4 was married to, but separated from, VICTIM 5. 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." On the same day, ODOM responded, and stated, "Umm no that[s] stalking and everything is tracked. I'm not getting fired for that."

Two days later, on September 15, 2024, ODOM searched VICTIM 4 and VICTIM 5's names on Dashboard. On December 4, 2024, ODOM again searched VICTIM 4's name on Dashboard. At no time during that period was there a legitimate law enforcement reason to search VICTIM 4 or VICTIM 5's information.

In November 2024, ODOM and VICTIM 4 traveled to Ocean City, Maryland for a vacation. While in Ocean City and off-duty, ODOM used his access to law enforcement databases to search the license plate of a hotel employee, VICTIM 6. On November 16, 2024, ODOM searched VICTIM 6's license plate on Dashboard. On that date, there was no legitimate law enforcement reason to search VICTIM 6's license plate.

On December 12, 2024, VICTIM 4 contacted the CCSO to report ODOM's conduct. In response, ODOM was served with a No-Contact Order that prohibited ODOM from contacting VICTIM 4 or VICTIM 4's children pursuant to an ongoing investigation (the "No-Contact Order"). ODOM signed the No-Contact Order on the same date. The No-Contact Order stated that ODOM's failure to follow the Order could result in misconduct charges filed against him. It further stated that the Order remained in effect until ODOM was told otherwise, and prohibited ODOM from discussing the investigation with anyone other than specific individuals.

Nonetheless, from at least March 8, 2025, through and including June 17, 2025, 2023, while the No Contact Order was still in effect and ODOM was aware that a criminal investigation was ongoing, ODOM had repeated contact with VICTIM 4 through text message and on different social media applications. On March 9, 2025, ODOM acknowledged in a text to VICTIM 4 that he was "ordered to not speak to [VICTIM 4] ever."

ODOM also had contact with VICTIM 4 in person. On March 9, 2025, ODOM and VICTIM 4 met in person at a secluded location in Cecil County, Maryland. At the beginning of that meeting, ODOM asked VICTIM 4 if VICTIM 4 was recording the meeting, to which VICTIM 4 responded that VICTIM 4 was not. VICTIM 4 then asked ODOM if he was recording the meeting, and ODOM responded that he was not. ODOM, however, did record the audio of the meeting with VICTIM 4 on his cell phone, without her knowledge or consent.

Despite the No-Contact Order prohibiting ODOM from speaking with VICTIM 4, or others about the investigation, ODOM repeatedly spoke with VICTIMS 1, 2, and 4 about the investigation. For example, during the meeting between VICTIM 4 and ODOM on March 9, 2025, ODOM repeatedly asked VICTIM 4 why VICTIM 4 told investigators certain information. Additionally, on March 10, 2025, ODOM texted VICTIM 4 and asked, "Why don't you ask for the no contact order to be dropped" and later instructed VICTIM 4 to "[d]elete everything." ODOM also had conversations about the investigation with VICTIMS 1, 2, and 4 immediately prior to and after the VICTIMS' interviews with investigators.

II. VICTIM 7

Beginning in 2019, ODOM worked in the same building as VICTIM 7. ODOM and VICTIM 7 two exchanged phone numbers between 2017 and 2019. On July 6, 2024, ODOM searched VICTIM 7's phone number in Dashboard. There was no legitimate law enforcement reason for ODOM to search VICTIM 7's information.

All events originated in Cecil County, Maryland.