IN THE CIRCUIT COURT OF BALTIMORE COUNTY

STATE OF MARYLAND	*	
V.	*	**CASE NO.: _____**
MELISSA ANN SMITH	*	**Tracking Number: 237003007791**
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CRIMINAL INFORMATION

THE OFFICE OF THE STATE PROSECUTOR for the State of Maryland, informs and charges MELISSA ANN SMITH 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 Maryland and federal election laws by all people 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 and Chairperson of a campaign finance entity serve as fiduciaries of the campaign finance entity.

5. Melissa Ann Smith[1] (hereinafter SMITH) served as Treasurer to the campaign finance entity "Friends of Luke Clippinger."

II. FRIENDS OF LUKE CLIPPINGER

6. The State incorporates paragraphs 1-5 of this Information as though fully set forth herein.
7. Friends of Luke Clippinger is a political committee established to promote the successful candidacy of Luke Clippinger to the Maryland House of Delegates.
8. Delegate Clippinger represents District 46 in Baltimore City. He was first elected on November 2, 2010, and most recently re-elected on November 3, 2026.
9. SMITH served as Treasurer for Friends of Luke Clippinger beginning on December 19, 2013, continuing through January 7, 2026. As a campaign finance entity, Friends of Luke Clippinger is regulated by Title 13 of the Election Law Article.
10. As Treasurer for Friends of Luke Clippinger, SMITH was responsible for receiving and depositing all contributions into the committee's bank account, dispersing funds from the committee's bank account, and accounting for all receipts and expenditures made by the political committee, Friends of Luke Clippinger.
11. To ensure transparency and accountability in campaign finance, campaign finance entities are required to file reports at least once a year and as many as six times a year during an election year.
12. Campaign finance reports are filed electronically with the State Board of Elections on approved software.

[1] The Defendant's legal name at the time of the alleged offense was Melissa Ann Evans. The Defendant has since changed her name to Melissa Ann Smith following a legal name change. All public and historical records associated with Melissa Ann Evans refer to the same individual named in this Information as Melissa Ann Smith.

13. As Treasurer, SMITH had a duty to accurately report all contributions received and all expenditures made by Friends of Like Clippinger in timely filed campaign finance reports submitted under penalty of perjury to the State Board of Elections.
14. The Treasurer, not the candidate, is responsible for submitting campaign finance reports and managing the supporting bank account.
15. Friends of Luke Clippinger maintains a bank account at BayVanguard Bank.
16. As Treasurer, SMITH was required by the Election Law Article and accompanying regulations to ensure that all expenditures from the committee's bank account were made in accordance with the purpose of the political committee, Friends of Luke Clippinger.
17. SMITH had no authority to utilize the money in the Friends of Luke Clippinger bank account for her personal use or benefit.

III. CHECKS ISSUED TO AND DEPOSITED INTO PERSONAL BANK ACCOUNT

18. The State incorporates paragraphs 1-17 of this Information as though fully set forth herein.
19. SMITH maintained several bank accounts in her own name that were not associated with the campaign finance entity, Friends of Luke Clippinger.
20. SMITH, having access to the bank account, checkbook, and funds collected for Friends of Luke Clippinger, from December 19, 2013, until January 7, 2026, issued checks made payable to SMITH from the BayVanguard Bank account associated with Friends of Luke Clippinger.
21. For example, on or about February 28, 2018, SMITH issued check #134 in the amount of $10,000, made payable to SMITH from the Friends of Luke Clippinger bank account.
22. The candidate did not have knowledge of this expenditure. The candidate did not approve this expenditure.

23. For example, on March 13, 2019, SMITH issued check #174 in the amount of $5,000 made payable to SMITH from the Friends of Luke Clippinger bank account.
24. The candidate did not have knowledge of this expenditure. The candidate did not approve this expenditure.
25. For example, on July 30, 2022, SMITH issued check #1025 in the amount of $5,000 made payable to SMITH from the Friends of Luke Clippinger bank account.
26. The candidate did not have knowledge of this expenditure. The candidate did not approve this expenditure.
27. For example, on February 15, 2023, SMITH issued check #1061 in the amount of $2,000 made payable to SMITH from the Friends of Luke Clippinger bank account.
28. The candidate did not have knowledge of this expenditure. The candidate did not approve this expenditure.
29. For example, on July 15, 2024, SMITH issued check #1084 in the amount of $10,000 made payable to SMITH from the Friends of Luke Clippinger bank account.
30. The candidate did not have knowledge of this expenditure. The candidate did not approve this expenditure.
31. For example, on December 7, 2026, SMITH issued check #1155 in the amount of $2,000 made payable SMITH from the Friends of Luke Clippinger bank account.
32. The candidate did not have knowledge of this expenditure. The candidate did not approve this expenditure.
33. SMITH used her mobile banking applications to electronically deposit 47 checks into her personal bank accounts with Ally Bank, PNC Bank, and SoFi Bank.
34. SMITH completed the electronic deposits in her home located in Baltimore County, Maryland.

IV. CAMPAIGN FINANCE REPORTS (CFRS): FRIENDS OF LUKE CLIPPINGER

35. The State incorporates paragraphs 1-34 of this Information as though fully set forth herein.

36. 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.

37. 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

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

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

40. The candidate can review the published reports, but those reports are separate from the actual bank account for Friends of Luke Clippinger, which was managed by SMITH as she was the only signatory authority on the Friends of Luke Clippinger bank account from December 2013 through December 2025.

41. For example, the 2024 Annual Campaign Finance Report covers all transactions from January 12, 2023, through January 10, 2024. The report does not include the nine checks issued from the Friends of Luke Clippinger bank account to SMITH's personal bank account.

42. For example, the 2025 Annual Campaign Finance Report covers all transactions from January 11, 2024, through January 8, 2025. The report does not include the six checks issued from the Friends of Luke Clippinger bank account to SMITH's personal bank account.

43. SMITH filed the reports and signed the reports under the penalty of perjury in her home in Baltimore County, Maryland.

COUNT ONE
Theft Scheme $25,000 to Under $100,000

44. On or about February 25, 2018, through December 29, 2025, MELISSA ANN SMITH did, pursuant to one scheme and continuing course of conduct, steal $87,155.33 from "Friends of Luke Clippinger" by issuing and depositing checks to her 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

COUNT TWO
Embezzlement

45. On or about February 25, 2018, through December 29, 2025, MELISSA ANN SMITH, being a fiduciary of the political committee known as "Friends of Luke Clippinger," did fraudulently and willfully appropriate to a use not in the due and lawful execution of her trust, money held by her in her fiduciary capacity, to wit: SMITH, being the duly appointed Treasurer for the political committee "Friends of Luke Clippinger" 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 $87,155.33 of funds belonging to the political committee "Friends of Luke Clippinger" into her personal bank account for her personal use and benefit, 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 7-113
CJIS Code 1-2799
Penalty: Not less than 1 year and not exceeding 5 years

COUNT THREE
Perjury/ Affidavit Required by Law
Friends of Luke Clippinger 2024 Annual report

46. On January 17, 2024, in Baltimore County, Maryland, MELISSA ANN SMITH did, in an affidavit required by law to be taken, to wit: the 2024 Annual campaign finance report for "Friends of Luke Clippinger," required by Election Law Article §13-304, willfully and falsely make an affirmation under penalty 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 FOUR
Perjury/ Affidavit Required by Law
Friends of Luke Clippinger 2025 Annual report

47. On January 15, 2025, in Baltimore County, Maryland, MELISSA ANN SMITH did, in an affidavit required by law to be taken, to wit: the 2025 Annual campaign finance report for "Friends of Luke Clippinger," required by Election Law Article §13-304, willfully and falsely make an affirmation under penalty 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

Dated: November 5, 2026

Respectfully submitted,

/S/ Charlton T. Howard III
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