

IN THE CIRCUIT COURT FOR BALTIMORE CITY

STATE OF MARYLAND

v.

TROY DESANTE BROWN

766 N. Grantley Street

Baltimore, Maryland 21229

DOB: [REDACTED] SID: [REDACTED] FBI/UCN: [REDACTED]
Tracking Number 19-7024-01018-6

(TRUE BILL)

GRAND JURY FOREPERSON

FILED: May 13, 2019

CHARGES:

Operate, Maintain, or Own an Assisted Living Program Without a License (Maryland Health-General Article § 19-1809(a)(1))

Operate, Maintain, or Own an Assisted Living Program Without a License (Maryland Health-General Article § 19-1809(a)(1))

Conspiracy to Operate, Maintain, or Own an Assisted Living Program Without a License (Common Law and Maryland Health-General Article § 19-1809(a)(1))

Theft Scheme \$1,500 to \$25,000 (Maryland Criminal Law Article § 7-104)

Attempted Exploitation of a Vulnerable Adult (Common Law and Maryland Criminal Law Article § 8-801(b)(1))

Extortion (Maryland Criminal Law Article § 3-701(b)(1) and § 3-701(b)(2))

Exploitation of a Vulnerable Adult (Maryland Criminal Law Article § 8-801(b)(1))

Theft \$1,000 to \$10,000 (Maryland Criminal Law Article § 7-104)

Conspiracy- Theft \$1,000 to \$10,000 (Common Law and Maryland Criminal Law Article § 7-104)

Embezzlement (Maryland Criminal Law Article § 7-113(a)(1))

Exploitation of a Vulnerable Adult (Maryland Criminal Law Article § 8-801(b)(1))

Theft \$1,000 to \$10,000 (Maryland Criminal Law Article § 7-104)

Embezzlement (Maryland Criminal Law Article § 7-113(a)(1))

Exploitation of a Vulnerable Adult (Maryland Criminal Law Article § 8-801(b)(1))

Theft \$1,000 to \$10,000 (Maryland Criminal Law Article § 7-104)

Embezzlement (Maryland Criminal Law Article § 7-113(a)(1))

Embezzlement (Maryland Criminal Law Article § 7-113(a)(1))

Embezzlement (Maryland Criminal Law Article § 7-113(a)(1))

Embezzlement (Maryland Criminal Law Article § 7-113(a)(1))

Common Law Forgery (Common Law)

Common Law Uttering (Common Law)

Counterfeiting a Public Seal (Maryland Criminal Law Article § 8-607(b)(3))

Identity Fraud (Maryland Criminal Law Article § 8-301(c)(1))

Public Assistance Fraud (Maryland Criminal Law Article § 8-503(b))

Fraudulent Statement in Public Assistance Application (Maryland Criminal Law Article § 8-504(b) and § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Public Assistance Fraud (Maryland Criminal Law Article § 8-503(b))

Fraudulent Statement in Public Assistance Application (Maryland Criminal Law Article § 8-504(b) and § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Public Assistance Fraud (Maryland Criminal Law Article § 8-503(b))

Fraudulent Statement in Public Assistance Application (Maryland Criminal Law Article § 8-504(b) and § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Public Assistance Fraud (Maryland Criminal Law Article § 8-503(b))

Fraudulent Statement in Public Assistance Application (Maryland Criminal Law Article § 8-504(b) and § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Public Assistance Fraud (Maryland Criminal Law Article § 8-503(b))

Fraudulent Statement in Public Assistance Application (Maryland Criminal Law Article § 8-504(b) and § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Willful Failure to File Tax Return (Maryland Tax-General Article § 13-1001(d))

Failure to Take Required Action (Maryland Tax-General Article § 10-804(a)(1) and § 13-1022)

Willful Failure to File Tax Return (Maryland Tax-General Article § 13-1001(d))

Failure to Take Required Action (Maryland Tax-General Article § 10-804(a)(1) and § 13-1022)

Defrauding State Health Plan–Medicaid Fraud (Maryland Criminal Law § 8-509(4) and 8-516(c))

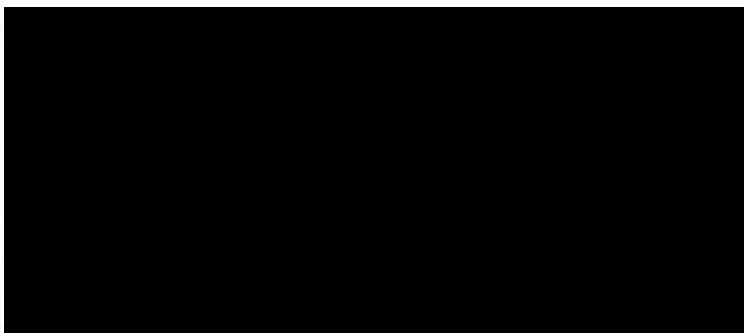
Obtaining Benefit by Fraud (Maryland Criminal Law § 8-514(4) and 8-516(c))

Theft \$25,000 to \$100,000 (Maryland Criminal Law Article § 7-104)

Fail to Pay Minimum Wage (Maryland Labor and Employment Article, § 3-428(b)(1)(i))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))



STATE OF MARYLAND

*

IN THE

v.

*

CIRCUIT COURT

TROY DESANTE BROWN

*

FOR BALTIMORE CITY

Defendant

*

CASE NO: 119133017

INDICTMENT

The Grand Jurors for the State of Maryland for Baltimore City charge:

COUNT ONE

**(OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM WITHOUT A
LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from as early as 2014 through the present, in Baltimore City, Maryland, unlawfully did knowingly and willfully operate, maintain, and own an assisted living program without a license at 766 North Grantley Street, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)

CJIS Code: 1_0577

Felony: 5 years and/or \$10,000 for a first offense

COUNT TWO
**(OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM WITHOUT A
LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from as early as 2014 through the present, in Baltimore City, Maryland, unlawfully did knowingly and willfully operate, maintain, and own an assisted living program without a license at 113 Allendale Street, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)
CJIS Code: 1_0577
Felony: 5 years and/or \$10,000 for a first offense

COUNT THREE
**(CONSPIRACY TO OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM
WITHOUT A LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from as early as 2013 through the present, in Baltimore City, Maryland, unlawfully did conspire with Dawn Daniels to knowingly and willfully operate, maintain, and own assisted living programs without a license, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

Common Law and Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)
CJIS Code: 1C0577
Misdemeanor: 5 years and/or \$10,000 for a first offense

COUNT FOUR
(THEFT SCHEME \$1,500 TO \$25,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from as early as 2013, through the present, in Baltimore City, Maryland, unlawfully did, pursuant to one scheme and continuing course of conduct, steal U.S. currency, property of residents of his unlicensed assisted living home, including, but not limited to, [REDACTED] the value of the property being \$1,500 or more but less than \$25,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_1160
Felony: 5 Years and/or \$10,000

COUNT FIVE
(ATTEMPTED EXPLOITATION OF A VULNERABLE ADULT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about January 8, 2016, to on or about January 9, 2016, unlawfully did attempt to knowingly and willfully obtain by deception, intimidation, and undue influence the property of [REDACTED] an individual that Troy Desante Brown knew and reasonably should have known is a vulnerable adult, with intent to deprive the vulnerable adult of the vulnerable adult's property, the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 8-801(b) of the Criminal Law Article of the Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

Common Law and Annotated Code of Maryland, Criminal Law Article, § 8-801(b)
CJIS Code: 1A1281
Misdemeanor: 10 years and/or \$10,000 fine

COUNT SIX
(EXTORTION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about January 8, 2016, to on or about January 9, 2016, in Baltimore City, Maryland, unlawfully did obtain, attempt to obtain, and conspire to obtain money, property, labor, services, and anything of value from [REDACTED], with consent which was induced by wrongful use of actual and threatened force and violence and economic injury, the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 3-701(b)(1) and 3-701(b)(2) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 3-701(b)(1) and § 3-701(b)(2)
CJIS Code: 1_1204
Felony: 10 years and/or \$10,000 fine

COUNT SEVEN
(EXPLOITATION OF A VULNERABLE ADULT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about January 8, 2016, to on or about February 27, 2017, in Baltimore City, Maryland, unlawfully did knowingly and willfully obtain by deception, intimidation, and undue influence the property of [REDACTED], an individual that Troy Desante Brown knew and reasonably should have known is a vulnerable adult, with intent to deprive the vulnerable adult of the vulnerable adult's property, the value of the property being \$1,500 or more but less than \$25,000, in violation of Section 8-801(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-801(b)
CJIS Code: 1_1388
Felony: 5 years and/or \$10,000 fine

COUNT EIGHT
(THEFT \$1,000 TO \$10,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about January 8, 2016, to on or about February 27, 2017, in Baltimore City, Maryland, unlawfully did steal U.S. currency, property of [REDACTED], the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_0622
Felony: 10 Years and/or \$10,000

COUNT NINE
(CONSPIRACY—THEFT \$1,000 TO \$10,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about January 8, 2016, to on or about February 27, 2017, in Baltimore City, Maryland, unlawfully did conspire with Dawn Daniels to steal U.S. currency, property of [REDACTED] the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

Common Law and Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1C0622
Felony: 10 Years and/or \$10,000

COUNT TEN
(EMBEZZLEMENT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about January 8, 2016, to on or about February 27, 2017, in Baltimore City, Maryland, unlawfully did, being a fiduciary of [REDACTED], fraudulently and willfully appropriate U.S. currency that Troy Desante Brown held in a fiduciary capacity, contrary to the requirements of Troy Desante Brown's fiduciary trust responsibility, in violation of Section 7-113(a)(1) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-113(a)(1)

CJIS Code: 1_2799

Misdemeanor: Not less than 1 year and not exceeding 5 years

COUNT ELEVEN
(EXPLOITATION OF A VULNERABLE ADULT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about February 1, 2016, to on or about March 3, 2016, in Baltimore City, Maryland, unlawfully did knowingly and willfully obtain by deception, intimidation, and undue influence the property of [REDACTED], an individual that Troy Desante Brown knew and reasonably should have known is a vulnerable adult, with intent to deprive the vulnerable adult of the vulnerable adult's property, the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 8-801(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-801(b)

CJIS Code: 1_1281

Felony: 10 years and/or \$10,000 fine

COUNT TWELVE
(THEFT \$1,000 TO \$10,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about February 1, 2016, to on or about March 3, 2016, in Baltimore City, Maryland, unlawfully did steal U.S. currency, property of [REDACTED], the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_0622
Felony: 10 Years and/or \$10,000

COUNT THIRTEEN
(EMBEZZLEMENT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about February 1, 2016, to on or about March 3, 2016, in Baltimore City, Maryland, unlawfully did, being a fiduciary of [REDACTED], fraudulently and willfully appropriate U.S. currency that Troy Desante Brown held in a fiduciary capacity, contrary to the requirements of Troy Desante Brown's fiduciary trust responsibility, in violation of Section 7-113(a)(1) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-113(a)(1)
CJIS Code: 1_2799
Misdemeanor: Not less than 1 year and not exceeding 5 years

COUNT FOURTEEN
(EXPLOITATION OF A VULNERABLE ADULT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about February 2, 2016, to on or about June 28, 2016, in Baltimore City, Maryland, unlawfully did knowingly and willfully obtain by deception, intimidation, and undue influence the property of [REDACTED], an individual that Troy Desante Brown knew and reasonably should have known is a vulnerable adult, with intent to deprive the vulnerable adult of the vulnerable adult's property, the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 8-801(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-801(b)

CJIS Code: 1_1281

Felony: 10 years and/or \$10,000 fine

COUNT FIFTEEN
(THEFT \$1,000 TO \$10,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about February 2, 2016, to on or about June 28, 2016, in Baltimore City, Maryland, unlawfully did steal U.S. currency, property of [REDACTED], the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104

CJIS Code: 1_0622

Felony: 10 Years and/or \$10,000

COUNT SIXTEEN
(EMBEZZLEMENT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about February 2, 2016, to on or about June 28, 2016, in Baltimore City, Maryland, unlawfully did, being a fiduciary of [REDACTED], fraudulently and willfully appropriate U.S. currency that Troy Desante Brown held in a fiduciary capacity, contrary to the requirements of Troy Desante Brown's fiduciary trust responsibility, in violation of Section 7-113(a)(1) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-113(a)(1)
CJIS Code: 1_2799
Misdemeanor: Not less than 1 year and not exceeding 5 years

COUNT SEVENTEEN
(EMBEZZLEMENT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about February 2, 2016, to the present, in Baltimore City, Maryland, unlawfully did, being a fiduciary of [REDACTED], fraudulently and willfully appropriate U.S. currency that Troy Desante Brown held in a fiduciary capacity, contrary to the requirements of Troy Desante Brown's fiduciary trust responsibility, in violation of Section 7-113(a)(1) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-113(a)(1)
CJIS Code: 1_2799
Misdemeanor: Not less than 1 year and not exceeding 5 years

COUNT EIGHTEEN
(EMBEZZLEMENT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about January 14, 2016, to the present, in Baltimore City, Maryland, unlawfully did, being a fiduciary of [REDACTED], fraudulently and willfully appropriate U.S. currency that Troy Desante Brown held in a fiduciary capacity, contrary to the requirements of Troy Desante Brown's fiduciary trust responsibility, in violation of Section 7-113(a)(1) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-113(a)(1)
CJIS Code: 1_2799
Misdemeanor: Not less than 1 year and not exceeding 5 years

COUNT NINETEEN
(EMBEZZLEMENT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from on or about February 7, 2017, to on or about February 8, 2017, in Baltimore City, Maryland, unlawfully did, being a fiduciary of [REDACTED], fraudulently and willfully appropriate U.S. currency that Troy Desante Brown held in a fiduciary capacity, contrary to the requirements of Troy Desante Brown's fiduciary trust responsibility, in violation of Section 7-113(a)(1) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-113(a)(1)
CJIS Code: 1_2799
Misdemeanor: Not less than 1 year and not exceeding 5 years

COUNT TWENTY
(COMMON LAW FORGERY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, between on or about September 1, 2015, and on or about December 21, 2015, in Baltimore City, Maryland, unlawfully did, with intent and purpose to defraud, make a false writing having apparent legal significance, to wit: an assisted living facility license, in violation of the Common Law; against the peace, government, and dignity of the State.

Common Law
CJIS Code: unknown
Felony: Any punishment which is not cruel or unusual

COUNT TWENTY-ONE
(COMMON LAW UTTERING)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, between on or about September 1, 2015, and on or about December 21, 2015, in Baltimore City, Maryland, unlawfully did, with intent to defraud another, utter and publish as true and genuine a counterfeit instrument and document, to wit: an altered assisted living facility license, with knowledge that the instrument was false, altered, forged, and counterfeited, in violation of the Common Law; against the peace, government, and dignity of the State.

Common Law
CJIS Code: unknown
Felony: Any punishment which is not cruel or unusual

COUNT TWENTY-TWO
(COUNTERFEITING A PUBLIC SEAL)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, between on or about September 1, 2015, and on or about December 21, 2015, in Baltimore City, Maryland, unlawfully did falsely, and with evil intent, affix a public seal to a writing, to wit: did affix the seal of Maryland to a forged assisted living facility license, in violation of Section 8-607(b)(3) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-607(b)(3)
CJIS Code: unknown
Misdemeanor: Not less than 2 years and not exceeding 10 years

COUNT TWENTY-THREE
(IDENTITY FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about July 31, 2018, in Baltimore City, Maryland, unlawfully did knowingly and willfully assume the identity of another, to wit: Eric Johnson, to avoid identification, apprehension, and prosecution for a crime, in violation of Section 8-301(c)(1) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-301(c)(1)
CJIS Code:
Misdemeanor: 1 year or \$500 fine

COUNT TWENTY-FOUR
(PUBLIC ASSISTANCE FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about June 26, 2018, in Baltimore City, Maryland, unlawfully did, by fraud, obtain and attempted to obtain money, property, food stamps, and other assistance that is provided under a social and nutritional program based on need, to which he was not entitled, to wit: food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, and did so by willfully making a false statement and representation regarding his income to the Department of Human Resources, in violation of Section 8-503(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-503(b)
CJIS Code: 7_2607
Misdemeanor: 3 years and/or \$1,000 fine

COUNT TWENTY-FIVE
(FRAUDULENT STATEMENT IN PUBLIC ASSISTANCE APPLICATION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about June 26, 2018, in Baltimore City, Maryland, unlawfully did, in a signed application required by Section 8-504(a) of the Criminal Law Article, make a false and fraudulent statement with the intent to obtain money, property, food stamps, and other assistance under a program based on need, to wit: did make a false and fraudulent statement regarding his income in an application for food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, in violation of Section 8-504(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-504(b) and § 9-101(a)(4)
CJIS Code: 2_2607
Misdemeanor: 10 years

COUNT TWENTY-SIX
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about June 26, 2018, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps, willfully and falsely make an oath and affirmation, to wit: stated he did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)
CJIS Code: 1_0309
Misdemeanor: 10 years

COUNT TWENTY-SEVEN
(PUBLIC ASSISTANCE FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about May 16, 2017, in Baltimore City, Maryland, unlawfully did, by fraud, obtain and attempted to obtain money, property, food stamps, and other assistance that is provided under a social and nutritional program based on need, to which he was not entitled, to wit: food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, and did so by willfully making a false statement and representation regarding his income to the Department of Human Resources, in violation of Section 8-503(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-503(b)

CJIS Code: 7_2607

Misdemeanor: 3 years and/or \$1,000 fine

COUNT TWENTY-EIGHT
(FRAUDULENT STATEMENT IN PUBLIC ASSISTANCE APPLICATION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about May 16, 2017, in Baltimore City, Maryland, unlawfully did, in a signed application required by Section 8-504(a) of the Criminal Law Article, make a false and fraudulent statement with the intent to obtain money, property, food stamps, and other assistance under a program based on need, to wit: did make a false and fraudulent statement regarding his income in an application for food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, in violation of Section 8-504(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-504(b) and § 9-101(a)(4)

CJIS Code: 2_2607

Misdemeanor: 10 years

COUNT TWENTY-NINE
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about May 16, 2017, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps, willfully and falsely make an oath and affirmation, to wit: stated he did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)
CJIS Code: 1_0309
Misdemeanor: 10 years

COUNT THIRTY
(PUBLIC ASSISTANCE FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about May 16, 2017, in Baltimore City, Maryland, unlawfully did, by fraud, obtain and attempted to obtain money, property, food stamps, and other assistance that is provided under a social and nutritional program based on need, to which he was not entitled, to wit: food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, and did so by willfully making a false statement and representation regarding his income to the Department of Human Resources, in violation of Section 8-503(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-503(b)
CJIS Code: 7_2607
Misdemeanor: 3 years and/or \$1,000 fine

COUNT THIRTY-ONE
(FRAUDULENT STATEMENT IN PUBLIC ASSISTANCE APPLICATION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about May 16, 2017, in Baltimore City, Maryland, unlawfully did, in a signed application required by Section 8-504(a) of the Criminal Law Article, make a false and fraudulent statement with the intent to obtain money, property, food stamps, and other assistance under a program based on need, to wit: did make a false and fraudulent statement regarding his income in an application for food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, in violation of Section 8-504(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-504(b) and § 9-101(a)(4)
CJIS Code: 2_2607
Misdemeanor: 10 years

COUNT THIRTY-TWO
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about May 16, 2017, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps, willfully and falsely make an oath and affirmation, to wit: stated he did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)
CJIS Code: 1_0309
Misdemeanor: 10 years

COUNT THIRTY-THREE
(PUBLIC ASSISTANCE FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about January 30, 2017, in Baltimore City, Maryland, unlawfully did, by fraud, obtain and attempted to obtain money, property, food stamps, and other assistance that is provided under a social and nutritional program based on need, to which he was not entitled, to wit: food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, and cash assistance, a social program financed in whole and in part by the State of Maryland administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, and did so by willfully making a false statement and representation regarding his income to the Department of Human Resources, in violation of Section 8-503(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-503(b)

CJIS Code: 7_2607

Misdemeanor: 3 years and/or \$1,000 fine

COUNT THIRTY-FOUR
(FRAUDULENT STATEMENT IN PUBLIC ASSISTANCE APPLICATION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about January 30, 2017, in Baltimore City, Maryland, unlawfully did, in a signed application required by Section 8-504(a) of the Criminal Law Article, make a false and fraudulent statement with the intent to obtain money, property, food stamps, and other assistance under a program based on need, to wit: did make a false and fraudulent statement regarding his income in an application for food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, in violation of Section 8-504(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-504(b) and § 9-101(a)(4)

CJIS Code: 2_2607

Misdemeanor: 10 years

COUNT THIRTY-FIVE
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about January 30, 2017, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps, willfully and falsely make an oath and affirmation, to wit: stated he did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)
CJIS Code: 1_0309
Misdemeanor: 10 years

COUNT THIRTY-SIX
(PUBLIC ASSISTANCE FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about January 10, 2017, in Baltimore City, Maryland, unlawfully did, by fraud, obtain and attempted to obtain money, property, food stamps, and other assistance that is provided under a social and nutritional program based on need, to which he was not entitled, to wit: food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, and did so by willfully making a false statement and representation regarding his income to the Department of Human Resources, in violation of Section 8-503(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-503(b)
CJIS Code: 7_2607
Misdemeanor: 3 years and/or \$1,000 fine

COUNT THIRTY-SEVEN
(FRAUDULENT STATEMENT IN PUBLIC ASSISTANCE APPLICATION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about January 10, 2017, in Baltimore City, Maryland, unlawfully did, in a signed application required by Section 8-504(a) of the Criminal Law Article, make a false and fraudulent statement with the intent to obtain money, property, food stamps, and other assistance under a program based on need, to wit: did make a false and fraudulent statement regarding his income in an application for food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, in violation of Section 8-504(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-504(b) and § 9-101(a)(4)
CJIS Code: 2_2607
Misdemeanor: 10 years

COUNT THIRTY-EIGHT
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about January 10, 2017, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps, willfully and falsely make an oath and affirmation, to wit: stated he did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)
CJIS Code: 1_0309
Misdemeanor: 10 years

COUNT THIRTY-NINE
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about December 7, 2015, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps and energy assistance, willfully and falsely make an oath and affirmation, to wit: stated he did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)
CJIS Code: 1_0309
Misdemeanor: 10 years

COUNT FORTY
(WILLFUL FAILURE TO FILE TAX RETURN)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from as early as January 1, 2018, through the present, in Baltimore City, Maryland, being a person who was required to file an income tax return, unlawfully did willfully fail to file an income tax return for taxable year 2017 as required under Title 10 of the Tax-General Article, in violation of Section 13-1001(d) of the Tax-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Tax-General Article, § 13-1001(d)
CJIS Code: unknown
Felony: 5 years and/or \$10,000 fine

COUNT FORTY-ONE
(FAILURE TO TAKE REQUIRED ACTION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from as early as January 1, 2018, through the present, in Baltimore City, Maryland, unlawfully did willfully fail to take an action that the Comptroller requires, to wit: file a 2017 income tax return, in violation of Sections 10-804(a)(1) and 13-1022 of the Tax-General Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Tax-General Article, § 10-804(a)(1) and § 13-1022
CJIS Code: unknown
Misdemeanor: 5 years and/or \$10,000 fine

COUNT FORTY-TWO
(WILLFUL FAILURE TO FILE TAX RETURN)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from as early as January 1, 2017, through the present, in Baltimore City, Maryland, being a person who was required to file an income tax return, unlawfully did willfully fail to file an income tax return for taxable year 2016 as required under Title 10 of the Tax-General Article, in violation of Section 13-1001(d) of the Tax-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Tax-General Article, § 13-1001(d)
CJIS Code: unknown
Felony: 5 years and/or \$10,000 fine

COUNT FORTY-THREE
(FAILURE TO TAKE REQUIRED ACTION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from as early as January 1, 2017, through the present, in Baltimore City, Maryland, unlawfully did willfully fail to take an action that the Comptroller requires, to wit: file a 2016 income tax return, in violation of Sections 10-804(a)(1) and 13-1022 of the Tax-General Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Tax-General Article, § 10-804(a)(1) and § 13-1022
CJIS Code: unknown
Misdemeanor: 5 years and/or \$10,000 fine

COUNT FORTY-FOUR
(DEFRAUDING STATE HEALTH PLAN—MEDICAID FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from as early as 2014, through the present, in Baltimore City, Maryland, unlawfully did, with the intent to defraud, make a false representation to a State health plan, the value of the medical services received being greater than \$1,500, in violation of Sections 8-509(4) and 8-516(c) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law, § 8-509(4) and 8-516(c)
CJIS Code: 2_2355
Felony: 5 years and/or \$100,000 fine

COUNT FORTY-FIVE
(OBTAINING BENEFIT BY FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from as early as 2014, through the present, in Baltimore City, Maryland, unlawfully did knowingly and willfully obtain and attempt to obtain medical care, the payment of all and a part of which is and may be made from federal and State funds under a State health plan, to wit: Medicaid, by fraud, deceit, false representation, and concealment, the value of the medical services received being greater than \$1,500, in violation of Sections 8-514(1) and 8-516(c) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law, § 8-514(4) and 8-516(c)
CJIS Code: 2_4115
Felony: 5 years and/or \$100,000 fine

COUNT FORTY-SIX
(THEFT \$25,000 TO \$100,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from as early as 2014, through the present, in Baltimore City, Maryland, unlawfully did steal U.S. currency, property of the Maryland Department of Human Resources and the U.S. Government, the value of the property being \$25,000 or more but less than \$100,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_1135
Felony: 10 Years and/or \$15,000

COUNT FORTY-SEVEN
(FAIL TO PAY MINIMUM WAGE)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, from as early as 2015, through the present, in Baltimore City, Maryland, unlawfully did pay [REDACTED] less than the wage required by the Wages and Hours subtitle of Title 3 of the Labor and Employment Article, in violation of Section 3-428(b)(1)(i) of the Labor and Employment Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Labor and Employment Article, § 3-428(b)(1)(i)
CJIS Code: unknown
Misdemeanor: \$1,000 fine

COUNT FORTY-EIGHT
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about June 13, 2018, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for business license, willfully and falsely make an oath and affirmation, to wit: stated he is not an employer, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)
CJIS Code: 1_0309
Misdemeanor: 10 years

COUNT FORTY-NINE
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about April 10, 2018, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for business license, willfully and falsely make an oath and affirmation, to wit: stated he is not an employer, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)

CJIS Code: 1_0309

Misdemeanor: 10 years

COUNT FIFTY
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Troy Desante Brown, on or about May 23, 2016, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for business license, willfully and falsely make an oath and affirmation, to wit: stated he is not an employer, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)

CJIS Code: 1_0309

Misdemeanor: 10 years

Brian E. Frosh/km

BRIAN E. FROSH
Attorney General of Maryland

Jared I. Albert

JARED I. ALBERT
Assistant Attorney General
CPF# 1312170013
Office of the Attorney General
200 St. Paul Place, 18th Floor
Baltimore, Maryland 21202
(410) 576-6581

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY

STATE OF MARYLAND

v.

TROY DESANTE BROWN

766 N. Grantley Street

Baltimore, Maryland 21229

DOB: [REDACTED] SID: [REDACTED], FBI/UCN: [REDACTED]
Tracking Number 19-7003-01227-5

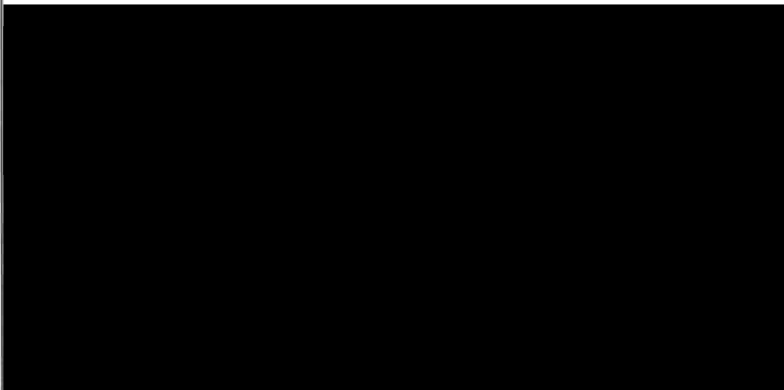
(TRUE BILL)

GRAND JURY FOREPERSON

FILED: May 15, 2019

CHARGES:

Theft \$25,000 to \$100,000 (Maryland Criminal Law Article § 7-104)



C-03-CR-19-001412

STATE OF MARYLAND

* IN THE

v.

* CIRCUIT COURT

TROY DESANTE BROWN

* FOR BALTIMORE COUNTY

Defendant

* CASE NO:

INDICTMENT

The Grand Jurors for the State of Maryland for Baltimore County charge:

COUNT ONE
(THEFT \$25,000-\$100,000)

The Grand Jurors for the State of Maryland for the body of Baltimore County, do upon their oaths and affirmations, present that Troy Desante Brown, from as early as 2013, through the present, in Baltimore County, Maryland, unlawfully did steal U.S. currency, property of the federal government and the U.S. Social Security Administration, the value of the property being \$25,000 or more but less than \$100,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104

CJIS Code: 1_1135

Felony: 10 years and/or \$15,000 fine


BRIAN E. FROSH

Attorney General of Maryland


JARED I. ALBERT

Assistant Attorney General

CPF# 1312170013

Office of the Attorney General

200 St. Paul Place, 18th Floor

Baltimore, Maryland 21202

(410) 576-6581

SCANNED

119133021

IN THE CIRCUIT COURT FOR BALTIMORE CITY

STATE OF MARYLAND

v.

**SHARON PRUNELLA ISAAC
A/K/A SHARON PRUNELLA ISSAC
A/K/A SHARON PRUNELLA McCRAY**

6212 Norvo Road

Baltimore, Maryland 21207

**DOB: [REDACTED] SID: [REDACTED], FBI/UCN: [REDACTED]
Tracking Number 19-7024-01021-2**

(TRUE BILL)

GRAND JURY FOREPERSON

FILED: May 13, 2019

CHARGES:

Operate, Maintain, or Own an Assisted Living Program Without a License (Maryland Health-General Article § 19-1809(a)(1))

Operate, Maintain, or Own an Assisted Living Program Without a License (Maryland Health-General Article § 19-1809(a)(1))

Operate, Maintain, or Own an Assisted Living Program Without a License (Maryland Health-General Article § 19-1809(a)(1))

Operate, Maintain, or Own an Assisted Living Program Without a License (Maryland Health-General Article § 19-1809(a)(1))

Operate, Maintain, or Own an Assisted Living Program Without a License (Maryland Health-General Article § 19-1809(a)(1))

Operate, Maintain, or Own an Assisted Living Program Without a License (Maryland Health-General Article § 19-1809(a)(1))

Conspiracy to Operate, Maintain, or Own an Assisted Living Program Without a License (Common Law and Maryland Health-General Article § 19-1809(a)(1))

Theft Scheme \$1,500 to \$25,000 (Maryland Criminal Law Article § 7-104)

Attempted Exploitation of a Vulnerable Adult (Common Law Maryland Criminal Law Article § 8-801(b))

Extortion (Maryland Criminal Law Article § 3-701(b)(1) and § 3-701(b)(2))

First Degree Assault (Maryland Criminal Law Article § 3-202(a)(1))

First Degree Abuse or Neglect of a Vulnerable Adult (Maryland Criminal Law Article § 3-604(b)(ii))

Exploitation of a Vulnerable Adult (Maryland Criminal Law Article § 8-801(b))

First Degree Abuse or Neglect of a Vulnerable Adult (Maryland Criminal Law Article § 3-604(b)(ii))

Theft \$1,000 to \$10,000 (Maryland Criminal Law Article § 7-104)

Embezzlement (Maryland Criminal Law Article § 7-113(a)(1))

Exploitation of a Vulnerable Adult (Maryland Criminal Law Article § 8-801(b))

Theft \$1,000 to \$10,000 (Maryland Criminal Law Article § 7-104)

Identity Fraud \$1,000 to \$10,000 (Maryland Criminal Law Article § 8-301(c)(2)(i))

Forgery (Maryland Criminal Law Article § 8-601(a))

Issuing (Maryland Criminal Law Article § 8-602(a))

Exploitation of a Vulnerable Adult (Maryland Criminal Law Article § 8-801(b))

Theft \$1,000 to \$10,000 (Maryland Criminal Law Article § 7-104)

Forgery (Maryland Criminal Law Article § 8-601(a))

Issuing (Maryland Criminal Law Article § 8-602(a))

Public Assistance Fraud (Maryland Criminal Law Article § 8-503(b))

Fraudulent Statement in Public Assistance Application (Maryland Criminal Law Article § 8-504(b) and § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Public Assistance Fraud (Maryland Criminal Law Article § 8-503(b))

Fraudulent Statement in Public Assistance Application (Maryland Criminal Law Article § 8-504(b) and § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Public Assistance Fraud (Maryland Criminal Law Article § 8-503(b))

Fraudulent Statement in Public Assistance Application (Maryland Criminal Law Article § 8-504(b) and § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Public Assistance Fraud (Maryland Criminal Law Article § 8-503(b))

Fraudulent Statement in Public Assistance Application (Maryland Criminal Law Article § 8-504(b) and § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Public Assistance Fraud (Maryland Criminal Law Article § 8-503(b))

Fraudulent Statement in Public Assistance Application (Maryland Criminal Law Article § 8-504(b) and § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Public Assistance Fraud (Maryland Criminal Law Article § 8-503(b))

Fraudulent Statement in Public Assistance Application (Maryland Criminal Law Article § 8-504(b) and § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

Perjury (Maryland Criminal Law Article § 9-101(a)(4))

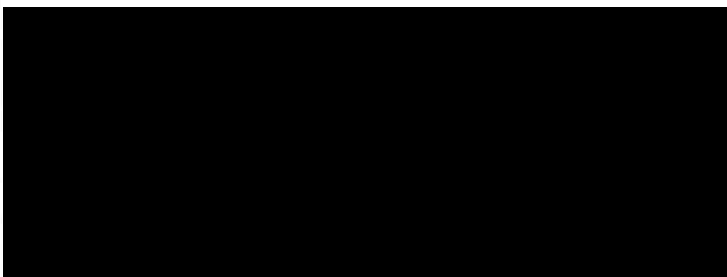
Willful Failure to File Tax Return (Maryland Tax-General Article § 13-1001(d))

Failure to Take Required Action (Maryland Tax-General Article § 10-804(a)(1) and § 13-1022)

Defrauding State Health Plan—Medicaid Fraud (Maryland Criminal Law § 8-509(4) and 8-516(c))

Obtaining Benefit by Fraud (Maryland Criminal Law § 8-514(4) and 8-516(c))

Theft \$25,000 to \$100,000 (Maryland Criminal Law Article § 7-104)



STATE OF MARYLAND

*** IN THE**

v.

*** CIRCUIT COURT**

SHARON PRUNELLA ISAAC
A/K/A SHARON PRUNELLA ISSAC
A/K/A SHARON PRUNELLA McCRAY *
Defendant

*** FOR BALTIMORE CITY**
CASE NO:

INDICTMENT

The Grand Jurors for the State of Maryland for Baltimore City charge:

COUNT ONE

**(OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM WITHOUT A
LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from as early as 2014 through the fall of 2017, in Baltimore City, Maryland, unlawfully did knowingly and willfully operate, maintain, and own an assisted living program without a license at 1010 Walnut Avenue, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)

CJIS Code: 1_0557

Felony: 5 years and/or \$10,000 for a first offense

COUNT TWO

**(OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM WITHOUT A
LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from 2017 through the beginning of 2019, in Baltimore City, Maryland, unlawfully did knowingly and willfully operate, maintain, and own an assisted living program without a license at 3905 W. Forest Park Avenue, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)

CJIS Code: 1_0557

Felony: 5 years and/or \$10,000 for a first offense

COUNT THREE

**(OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM WITHOUT A
LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from as early as 2014 through the present, in Baltimore City, Maryland, unlawfully did knowingly and willfully operate, maintain, and own an assisted living program without a license at 2817 Ulman Avenue, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)

CJIS Code: 1_0557

Felony: 5 years and/or \$10,000 for a first offense

COUNT FOUR
**(OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM WITHOUT A
LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from as early as 2014 through 2017, in Baltimore City, Maryland, unlawfully did knowingly and willfully operate, maintain, and own an assisted living program without a license at 2815 Ulman Avenue, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)

CJIS Code: 1_0557

Felony: 5 years and/or \$10,000 for a first offense

COUNT FIVE
**(OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM WITHOUT A
LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from as early as 2014 through 2017, in Baltimore City, Maryland, unlawfully did knowingly and willfully operate, maintain, and own an assisted living program without a license at 4009 Barrington Road, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)

CJIS Code: 1_0557

Felony: 5 years and/or \$10,000 for a first offense

COUNT SIX
**(OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM WITHOUT A
LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from as early as 2014 through 2017, in Baltimore City, Maryland, unlawfully did knowingly and willfully operate, maintain, and own an assisted living program without a license at 3727 Overview Road, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)

CJIS Code: 1_0557

Felony: 5 years and/or \$10,000 for a first offense

COUNT SEVEN
**(CONSPIRACY TO OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM
WITHOUT A LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from as early as 2013 through the present, in Baltimore City, Maryland, unlawfully did conspire with Barbara Parker and Cordell Joyner to knowingly and willfully operate, maintain, and own assisted living programs without a license, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

Common Law and Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)

CJIS Code: 1C0557

Misdemeanor: 5 years and/or \$10,000 for a first offense

COUNT EIGHT
(THEFT SCHEME \$1,500 TO \$25,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from as early as 2013, through the present, in Baltimore City, Maryland, unlawfully did, pursuant to one scheme and continuing course of conduct, steal U.S. currency, property of another, including, but not limited, to [REDACTED] the value of the property being \$1,500 or more but less than \$25,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_1160
Felony: 5 Years and/or \$10,000

COUNT NINE
(ATTEMPTED EXPLOITATION OF A VULNERABLE ADULT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from on or about November 11, 2015, to on or about December 5, 2015, in Baltimore City, Maryland, unlawfully did attempt to knowingly and willfully obtain by deception, intimidation, and undue influence the property of [REDACTED], an individual that Sharon Prunella Isaac knew and reasonably should have known is a vulnerable adult, with intent to deprive the vulnerable adult of the vulnerable adult's property, the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 8-801(b) of the Criminal Law Article of the Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

Common Law and Annotated Code of Maryland, Criminal Law Article, § 8-801(b)
CJIS Code: 1A1281
Misdemeanor: 10 years and/or \$10,000 fine

COUNT TEN
(EXTORTION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from on or about November 11, 2015, to on or about December 5, 2015, in Baltimore City, Maryland, unlawfully did obtain, attempt to obtain, and conspire to obtain money, property, labor, services, and anything of value from [REDACTED] with consent which was induced by wrongful use of actual and threatened force and violence and economic injury, the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 3-701(b)(1) and 3-701(b)(2) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 3-701(b)(1) and § 3-701(b)(2)
CJIS Code: 1_1204
Felony: 10 years and/or \$10,000 fine

COUNT ELEVEN
(FIRST DEGREE ASSAULT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about December 5, 2015, in Baltimore City, Maryland, unlawfully did assault [REDACTED] in the first degree, in violation of Section 3-202(a)(1) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 3-202(a)(1)
CJIS Code: 1_1420
Felony: 25 years

COUNT TWELVE
(FIRST DEGREE ABUSE OR NEGLECT OF A VULNERABLE ADULT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about December 5, 2015, in Baltimore City, Maryland, unlawfully did, being a caregiver and other person who has permanent and temporary care and responsibility for the supervision of [REDACTED], a vulnerable adult, caused abuse and neglect to [REDACTED] that caused serious physical injury to [REDACTED], in violation of Section 3-604(b)(ii) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 3-604(b)(ii)
CJIS Code: 2_1138
Felony: 10 years and/or \$10,000 fine

COUNT THIRTEEN
(EXPLOITATION OF A VULNERABLE ADULT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from on or about October 1, 2015, to on or about November 30, 2015, in Baltimore City, Maryland, unlawfully did knowingly and willfully obtain by deception, intimidation, and undue influence the property of [REDACTED], an individual that Sharon Prunella Isaac knew and reasonably should have known is a vulnerable adult, with intent to deprive the vulnerable adult of the vulnerable adult's property, the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 8-801(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-801(b)
CJIS Code: 1_1281
Felony: 10 years and/or \$10,000 fine

COUNT FOURTEEN
(FIRST DEGREE ABUSE OR NEGLECT OF A VULNERABLE ADULT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from on or about October 1, 2015, to on or about October 19, 2015, in Baltimore City, Maryland, unlawfully did, being a caregiver and other person who has permanent and temporary care and responsibility for the supervision of [REDACTED], a vulnerable adult, caused abuse and neglect to [REDACTED] that caused serious physical injury to [REDACTED] in violation of Section 3-604(b)(ii) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 3-604(b)(ii)
CJIS Code: 2_1138
Felony: 10 years and/or \$10,000 fine

COUNT FIFTEEN
(THEFT \$1,000 TO \$10,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from on or about October 1, 2015, to on or about November 30, 2015, in Baltimore City, Maryland, unlawfully did steal U.S. currency, property of [REDACTED], the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_0622
Felony: 10 Years and/or \$10,000

COUNT SIXTEEN
(EMBEZZLEMENT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from on or about October 1, 2015, to on or about November 30, 2015, in Baltimore City, Maryland, unlawfully did, being a fiduciary of [REDACTED], fraudulently and willfully appropriate U.S. currency that Sharon Prunella Isaac held in a fiduciary capacity, contrary to the requirements of Sharon Prunella Isaac's fiduciary trust responsibility, in violation of Section 7-113(a)(1) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-113(a)(1)

CJIS Code: 1_2799

Misdemeanor: Not less than 1 year and not exceeding 5 years

COUNT SEVENTEEN
(EXPLOITATION OF A VULNERABLE ADULT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, in late April 2015, in Baltimore City, Maryland, unlawfully did knowingly and willfully obtain by deception, intimidation, and undue influence the property of [REDACTED], an individual that Sharon Prunella Isaac knew and reasonably should have known is a vulnerable adult, with intent to deprive the vulnerable adult of the vulnerable adult's property, the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 8-801(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-801(b)

CJIS Code: 1_1281

Felony: 10 years and/or \$10,000 fine

COUNT EIGHTEEN
(THEFT \$1,000 TO \$10,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about April 25, 2015, in Baltimore City, Maryland, unlawfully did steal U.S. currency, property of [REDACTED] the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_0622
Felony: 10 Years and/or \$10,000

COUNT NINETEEN
(IDENTITY FRAUD \$1,000 TO \$10,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about April 25, 2015, in Baltimore City, Maryland, unlawfully did knowingly and willfully assume the identity of another, to wit: [REDACTED], with fraudulent intent to obtain a benefit, credit, good, service, and other item of value, to wit: U.S. currency, the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 8-301(c)(2)(i) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-301(c)(2)(i)
CJIS Code: 1_1265
Felony: 10 Years and/or \$10,000

COUNT TWENTY
(FORGERY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about April 25, 2015, in Baltimore City, Maryland, unlawfully did, with intent to defraud another, counterfeit, cause to be counterfeited, and willingly aid and assist in counterfeiting, a private document, to wit: the endorsement of a check written to [REDACTED], in violation of Section 8-601(a) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-601(a)

CJIS Code: 1_2502

Felony: 10 Years and/or \$10,000

COUNT TWENTY-ONE
(ISSUING A COUNTERFEIT INSTRUMENT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about April 25, 2015, in Baltimore City, Maryland, unlawfully did, with intent to defraud another, issue and publish as true a counterfeit instrument and document listed in Section 8-601, to wit: the endorsement of a check written to [REDACTED], in violation of Section 8-602(a) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-602(a)

CJIS Code: 1_2502

Felony: 10 Years and/or \$10,000

COUNT TWENTY-TWO
(EXPLOITATION OF A VULNERABLE ADULT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from on or about January 1, 2016, through on or about February 28, 2016, in Baltimore City, Maryland, unlawfully did knowingly and willfully obtain by deception, intimidation, and undue influence the property of [REDACTED], an individual that Sharon Prunella Isaac knew and reasonably should have known is a vulnerable adult, with intent to deprive the vulnerable adult of the vulnerable adult's property, the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 8-801(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-801(b)

CJIS Code: 1_1281

Felony: 10 years and/or \$10,000 fine

COUNT TWENTY-THREE
(THEFT \$1,000 TO \$10,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from on or about January 1, 2016, through on or about February 28, 2016, in Baltimore City, Maryland, unlawfully did steal U.S. currency, property of [REDACTED], the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104

CJIS Code: 1_0622

Felony: 10 Years and/or \$10,000

COUNT TWENTY-FOUR
(FORGERY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about September 25, 2015, in Baltimore City, Maryland, unlawfully did, with intent to defraud another, counterfeit, cause to be counterfeited, and willingly aid and assist in counterfeiting, a private document, to wit: the endorsement of a check written to [REDACTED] in violation of Section 8-601(a) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-601(a)
CJIS Code: 1_2502
Felony: 10 Years and/or \$10,000

COUNT TWENTY-FIVE
(ISSUING A COUNTERFEIT INSTRUMENT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about September 25, 2015, in Baltimore City, Maryland, unlawfully did, with intent to defraud another, issue and publish as true a counterfeit instrument and document listed in Section 8-601, to wit: the endorsement of a check written to [REDACTED], in violation of Section 8-602(a) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-602(a)
CJIS Code: 1_2502
Felony: 10 Years and/or \$10,000

COUNT TWENTY-SIX
(PUBLIC ASSISTANCE FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about May 29, 2018, in Baltimore City, Maryland, unlawfully did, by fraud, obtain and attempted to obtain money, property, food stamps, and other assistance that is provided under a social and nutritional program based on need, to which she was not entitled, to wit: food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, and did so by willfully making a false statement and representation regarding her income to the Department of Human Resources, in violation of Section 8-503(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-503(b)

CJIS Code: 7_2607

Misdemeanor: 3 years and/or \$1,000 fine

COUNT TWENTY-SEVEN
(FRAUDULENT STATEMENT IN PUBLIC ASSISTANCE APPLICATION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about May 29, 2018, in Baltimore City, Maryland, unlawfully did, in a signed application required by Section 8-504(a) of the Criminal Law Article, make a false and fraudulent statement with the intent to obtain money, property, food stamps, and other assistance under a program based on need, to wit: did make a false and fraudulent statement regarding her income in an application for food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, in violation of Section 8-504(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-504(b) and § 9-101(a)(4)

CJIS Code: 2_2607

Misdemeanor: 10 years

COUNT TWENTY-EIGHT
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about May 29, 2018, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps, willfully and falsely make an oath and affirmation, to wit: stated she did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)
CJIS Code: 1_0309
Misdemeanor: 10 years

COUNT TWENTY-NINE
(PUBLIC ASSISTANCE FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about November 21, 2017, in Baltimore City, Maryland, unlawfully did, by fraud, obtain and attempted to obtain money, property, food stamps, and other assistance that is provided under a social and nutritional program based on need, to which she was not entitled, to wit: food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, and did so by willfully making a false statement and representation regarding her income to the Department of Human Resources, in violation of Section 8-503(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-503(b)
CJIS Code: 7_2607
Misdemeanor: 3 years and/or \$1,000 fine

COUNT THIRTY
(FRAUDULENT STATEMENT IN PUBLIC ASSISTANCE APPLICATION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about November 21, 2017, in Baltimore City, Maryland, unlawfully did, in a signed application required by Section 8-504(a) of the Criminal Law Article, make a false and fraudulent statement with the intent to obtain money, property, food stamps, and other assistance under a program based on need, to wit: did make a false and fraudulent statement regarding her income in an application for food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, in violation of Section 8-504(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-504(b) and § 9-101(a)(4)
CJIS Code: 2_2607
Misdemeanor: 10 years

COUNT THIRTY-ONE
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about November 21, 2017, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps, willfully and falsely make an oath and affirmation, to wit: stated she did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)
CJIS Code: 1_0309
Misdemeanor: 10 years

COUNT THIRTY-TWO
(PUBLIC ASSISTANCE FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about May 16, 2017, in Baltimore City, Maryland, unlawfully did, by fraud, obtain and attempted to obtain money, property, food stamps, and other assistance that is provided under a social and nutritional program based on need, to which she was not entitled, to wit: food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, and did so by willfully making a false statement and representation regarding her income to the Department of Human Resources, in violation of Section 8-503(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-503(b)

CJIS Code: 7_2607

Misdemeanor: 3 years and/or \$1,000 fine

COUNT THIRTY-THREE
(FRAUDULENT STATEMENT IN PUBLIC ASSISTANCE APPLICATION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about May 16, 2017, in Baltimore City, Maryland, unlawfully did, in a signed application required by Section 8-504(a) of the Criminal Law Article, make a false and fraudulent statement with the intent to obtain money, property, food stamps, and other assistance under a program based on need, to wit: did make a false and fraudulent statement regarding her income in an application for food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, in violation of Section 8-504(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-504(b) and § 9-101(a)(4)

CJIS Code: 2_2607

Misdemeanor: 10 years

COUNT THIRTY-FOUR
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about May 16, 2017, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps, willfully and falsely make an oath and affirmation, to wit: stated she did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)
CJIS Code: 1_0309
Misdemeanor: 10 years

COUNT THIRTY-FIVE
(PUBLIC ASSISTANCE FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about November 20, 2016, in Baltimore City, Maryland, unlawfully did, by fraud, obtain and attempted to obtain money, property, food stamps, and other assistance that is provided under a social and nutritional program based on need, to which she was not entitled, to wit: food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, and cash assistance, a social program financed in whole and in part by the State of Maryland administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, and did so by willfully making a false statement and representation regarding her income to the Department of Human Resources, in violation of Section 8-503(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-503(b)
CJIS Code: 7_2607
Misdemeanor: 3 years and/or \$1,000 fine

COUNT THIRTY-SIX
(FRAUDULENT STATEMENT IN PUBLIC ASSISTANCE APPLICATION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about November 20, 2016, in Baltimore City, Maryland, unlawfully did, in a signed application required by Section 8-504(a) of the Criminal Law Article, make a false and fraudulent statement with the intent to obtain money, property, food stamps, and other assistance under a program based on need, to wit: did make a false and fraudulent statement regarding her income in an application for food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, in violation of Section 8-504(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-504(b) and § 9-101(a)(4)
CJIS Code: 2_2607
Misdemeanor: 10 years

COUNT THIRTY-SEVEN
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about November 20, 2016, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps, willfully and falsely make an oath and affirmation, to wit: stated she did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)
CJIS Code: 1_0309
Misdemeanor: 10 years

COUNT THIRTY-EIGHT
(PUBLIC ASSISTANCE FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about September 23, 2016, in Baltimore City, Maryland, unlawfully did, by fraud, obtain and attempted to obtain money, property, food stamps, and other assistance that is provided under a social and nutritional program based on need, to which she was not entitled, to wit: food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, and did so by willfully making a false statement and representation regarding her income to the Department of Human Resources, in violation of Section 8-503(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-503(b)
CJIS Code: 7_2607
Misdemeanor: 3 years and/or \$1,000 fine

COUNT THIRTY-NINE
(FRAUDULENT STATEMENT IN PUBLIC ASSISTANCE APPLICATION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about September 23, 2016, in Baltimore City, Maryland, unlawfully did, in a signed application required by Section 8-504(a) of the Criminal Law Article, make a false and fraudulent statement with the intent to obtain money, property, food stamps, and other assistance under a program based on need, to wit: did make a false and fraudulent statement regarding her income in an application for food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, in violation of Section 8-504(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-504(b) and § 9-101(a)(4)
CJIS Code: 2_2607
Misdemeanor: 10 years

COUNT FORTY
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about September 23, 2016, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps, willfully and falsely make an oath and affirmation, to wit: stated she did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)
CJIS Code: 1_0309
Misdemeanor: 10 years

COUNT FORTY-ONE
(PUBLIC ASSISTANCE FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about August 10, 2016, in Baltimore City, Maryland, unlawfully did, by fraud, obtain and attempted to obtain money, property, food stamps, and other assistance that is provided under a social and nutritional program based on need, to which she was not entitled, to wit: food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, and did so by willfully making a false statement and representation regarding her income to the Department of Human Resources, in violation of Section 8-503(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-503(b)
CJIS Code: 7_2607
Misdemeanor: 3 years and/or \$1,000 fine

COUNT FORTY-TWO
(FRAUDULENT STATEMENT IN PUBLIC ASSISTANCE APPLICATION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about August 10, 2016, in Baltimore City, Maryland, unlawfully did, in a signed application required by Section 8-504(a) of the Criminal Law Article, make a false and fraudulent statement with the intent to obtain money, property, food stamps, and other assistance under a program based on need, to wit: did make a false and fraudulent statement regarding her income in an application for food stamps from the Food Supplement Program, a nutritional program financed in whole and in part by the State of Maryland and administered by the State of Maryland, the Department of Human Services, and the Department of Human Resources, in violation of Section 8-504(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-504(b) and § 9-101(a)(4)
CJIS Code: 2_2607
Misdemeanor: 10 years

COUNT FORTY-THREE
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about August 10, 2016, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps, willfully and falsely make an oath and affirmation, to wit: stated she did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)
CJIS Code: 1_0309
Misdemeanor: 10 years

COUNT FORTY-FOUR
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about April 8, 2016, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps, willfully and falsely make an oath and affirmation, to wit: stated she did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)

CJIS Code: 1_0309

Misdemeanor: 10 years

COUNT FORTY-FIVE
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about May 6, 2015, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps, willfully and falsely make an oath and affirmation, to wit: stated she did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)

CJIS Code: 1_0309

Misdemeanor: 10 years

COUNT FORTY-SIX
(PERJURY)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about September 29, 2014, in Baltimore City, Maryland, unlawfully did, in an affidavit required by a state and local government, to wit: an application for food stamps, willfully and falsely make an oath and affirmation, to wit: stated she did not have any income, in violation of Section 9-101(a)(4) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 9-101(a)(4)
CJIS Code: 1_0309
Misdemeanor: 10 years

COUNT FORTY-SEVEN
(WILLFUL FAILURE TO FILE TAX RETURN)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from as early as January 1, 2017, through the present, in Baltimore City, Maryland, being a person who was required to file an income tax return, unlawfully did willfully fail to file an income tax return for taxable year 2016 as required under Title 10 of the Tax-General Article, in violation of Section 13-1001(d) of the Tax-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Tax-General Article, § 13-1001(d)
CJIS Code: unknown
Felony: 5 years and/or \$10,000 fine

COUNT FORTY-EIGHT
(FAILURE TO TAKE REQUIRED ACTION)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from as early as January 1, 2017, through the present, in Baltimore City, Maryland, unlawfully did willfully fail to take an action that the Comptroller requires, to wit: file a 2016 income tax return, in violation of Sections 10-804(a)(1) and 13-1022 of the Tax-General Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Tax-General Article, § 10-804(a)(1) and § 13-1022
CJIS Code: unknown
Misdemeanor: 5 years and/or \$10,000 fine

COUNT FORTY-NINE
(DEFRAUDING STATE HEALTH PLAN—MEDICAID FRAUD)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from as early as 2014, through the present, in Baltimore City, Maryland, unlawfully did, with the intent to defraud, make a false representation to a State health plan, the value of the medical services received being greater than \$1,500, in violation of Sections 8-509(4) and 8-516(c) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law, § 8-509(4) and 8-516(c)
CJIS Code: 2_2355
Felony: 5 years and/or \$100,000 fine

COUNT FIFTY
(OBTAINING BENEFIT BY FRAUD)

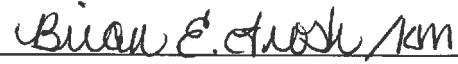
The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from as early as 2014, through the present, in Baltimore City, Maryland, unlawfully did knowingly and willfully obtain and attempt to obtain medical care, the payment of all and a part of which is and may be made from federal and State funds under a State health plan, to wit: Medicaid, by fraud, deceit, false representation, and concealment, the value of the medical services received being greater than \$1,500, in violation of Sections 8-514(1) and 8-516(c) of the Criminal Law Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law, § 8-514(4) and 8-516(c)
CJIS Code: 2_4115
Felony: 5 years and/or \$100,000 fine

COUNT FIFTY-ONE
(THEFT \$25,000 TO \$100,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from as early as 2014, through the present, in Baltimore City, Maryland, unlawfully did steal U.S. currency, property of the Maryland Department of Human Resources and the U.S. Government, the value of the property being \$25,000 or more but less than \$100,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_1135
Felony: 10 Years and/or \$15,000



BRIAN E. FROSH
Attorney General of Maryland



JARED I. ALBERT
Assistant Attorney General
CPF# 1312170013
Office of the Attorney General
200 St. Paul Place, 18th Floor
Baltimore, Maryland 21202
(410) 576-6581

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY

STATE OF MARYLAND

v.

**SHARON PRUNELLA ISAAC
A/K/A SHARON PRUNELLA ISSAC
A/K/A SHARON PRUNELLA McCRAY**

6212 Norvo Road

Baltimore, Maryland 21207

DOB: [REDACTED] SID: [REDACTED] FBI/UCN: [REDACTED]

Tracking Number 19-7003-01228-6

District Court Case D-08-CR-19-002005

[REDACTED] (TRUE BILL)

~~GRAND~~ JURY FOREPERSON

FILED: May 15, 2019

CHARGES:

Operate, Maintain, or Own an Assisted Living Program Without a License (Maryland Health-General Article § 19-1809(a)(1))

Theft \$1,500 to \$25,000 (Maryland Criminal Law Article § 7-104)

Identity Fraud \$1,500 to \$25,000 (Maryland Criminal Law Article § 8-301(c)(2)(i))

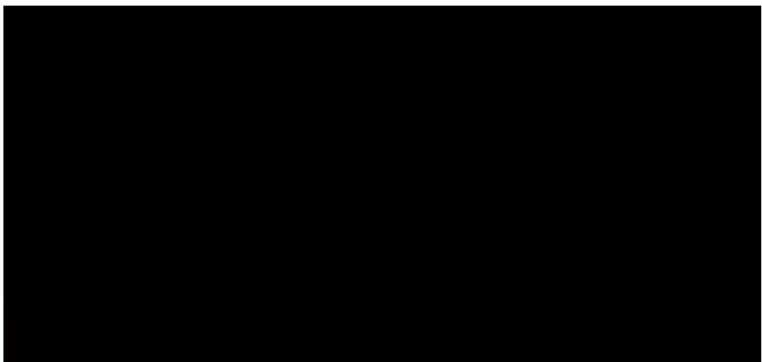
Theft Scheme \$1,500 to \$25,000 (Maryland Criminal Law Article § 7-104)

Conspiracy—Theft \$1,500 to \$25,000 (Common Law)

Identity Fraud Less Than \$1,000 (Maryland Criminal Law Article § 8-301(c)(2)(i))

Theft Less Than \$100 (Maryland Criminal Law Article § 7-104)

SCANNED



STATE OF MARYLAND

*** IN THE**

v.

*** CIRCUIT COURT**

**SHARON PRUNELLA ISAAC
A/K/A SHARON PRUNELLA ISSAC
A/K/A SHARON PRUNELLA McCRAY
Defendant**

*** FOR BALTIMORE COUNTY**

*** CASE NO:**

INDICTMENT

The Grand Jurors for the State of Maryland for Baltimore County charge:

COUNT ONE

**(OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM WITHOUT A
LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore County, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from as early as January 2019, through the present, in Baltimore County, Maryland, unlawfully did knowingly and willfully operate, maintain, and own an assisted living program without a license at 6212 Norvo Road, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)

CJIS Code: 1_0557

Felony: 5 years and/or \$10,000 for a first offense

COUNT TWO
(THEFT \$1,500-\$25,000)

The Grand Jurors for the State of Maryland for the body of Baltimore County, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from as early as 2013, through the present, in Baltimore County, Maryland, unlawfully did steal U.S. currency, property of the federal government and the U.S. Social Security Administration, the value of the property being \$1,500 or more but less than \$25,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_1136
Felony: 5 years and/or \$10,000 fine

COUNT THREE
(IDENTITY FRAUD \$1,500-\$25,000)

The Grand Jurors for the State of Maryland for the body of Baltimore County, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from on or about May 19, 2016, through on or about July 23, 2018, in Baltimore County, Maryland, unlawfully did knowingly and willfully assume the identity of another, to wit: [REDACTED] [REDACTED] with fraudulent intent to obtain a benefit, credit, good, service, and other item of value, to wit: food, the value of the property being \$1,500 or more but less than \$25,000, in violation of Section 8-301(c)(2)(i) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-301(c)(2)(i)
CJIS Code: 1_1368
Felony: 5 years and/or \$10,000 fine

COUNT FOUR
(THEFT SCHEME \$1,500-\$25,000)

The Grand Jurors for the State of Maryland for the body of Baltimore County, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from on or about May 19, 2016, through on or about July 23, 2018, in Baltimore County, Maryland, unlawfully did, pursuant to one scheme and continuing course of conduct, steal U.S. currency, property of [REDACTED] and the Maryland Department of Human Services, the value of the property being \$1,500 or more but less than \$25,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_1160
Felony: 5 years and/or \$10,000 fine

COUNT FIVE
(CONSPIRACY-THEFT \$1,500-\$25,000)

The Grand Jurors for the State of Maryland for the body of Baltimore County, do upon their oaths and affirmations, present that Sharon Prunella Isaac, from on or about May 19, 2016, through on or about July 23, 2018, in Baltimore County, Maryland, unlawfully did conspire with Barbara Parker to steal U.S. currency, property of [REDACTED] and the Maryland Department of Human Services, the value of the property being \$1,500 or more but less than \$25,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1C1136
Misdemeanor: 5 years and/or \$10,000 fine

COUNT SIX
(IDENTITY FRAUD LESS THAN \$1,000)

The Grand Jurors for the State of Maryland for the body of Baltimore County, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about June 29, 2017, in Baltimore County, Maryland, unlawfully did knowingly and willfully assume the identity of another, to wit: [REDACTED] with fraudulent intent to obtain a benefit, credit, good, service, and other item of value, to wit: food, the value of the property being less than \$1,000, in violation of Section 8-301(c)(2)(i) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-301(c)(2)(i)
CJIS Code: 1_1261
Misdemeanor: 18 months and/or \$500 fine

COUNT SEVEN
(THEFT LESS THAN \$100)

The Grand Jurors for the State of Maryland for the body of Baltimore County, do upon their oaths and affirmations, present that Sharon Prunella Isaac, on or about June 29, 2017, in Baltimore County, Maryland, unlawfully did steal U.S. currency, property of [REDACTED] and the Maryland Department of Human Services, the value of the property being less than \$100, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_0521
Misdemeanor: 90 days and/or \$500 fine



BRIAN E. FROSH
Attorney General of Maryland



JARED I. ALBERT
Assistant Attorney General
CPF# 1312170013
Office of the Attorney General
200 St. Paul Place, 18th Floor
Baltimore, Maryland 21202
(410) 576-6581

119133020

IN THE CIRCUIT COURT FOR BALTIMORE CITY

STATE OF MARYLAND

v.

BARBARA JEAN PARKER

2817 Ulman Avenue

Baltimore, Maryland 21215

DOB: [REDACTED] SID: [REDACTED], FBI/UCN: [REDACTED]
Tracking Number 19-7024-01022-3

(TRUE BILL)

GRAND JURY FOREPERSON

FILED: May 13, 2019

CHARGES:

Operate, Maintain, or Own an Assisted Living Program Without a License (Maryland Health-General Article § 19-1809(a)(1))

Operate, Maintain, or Own an Assisted Living Program Without a License (Maryland Health-General Article § 19-1809(a)(1))

Operate, Maintain, or Own an Assisted Living Program Without a License (Maryland Health-General Article § 19-1809(a)(1))

Operate, Maintain, or Own an Assisted Living Program Without a License (Maryland Health-General Article § 19-1809(a)(1))

Operate, Maintain, or Own an Assisted Living Program Without a License (Maryland Health-General Article § 19-1809(a)(1))

Conspiracy to Operate, Maintain, or Own an Assisted Living Program Without a License (Common Law and Maryland Health-General Article § 19-1809(a)(1))

Theft Scheme \$1,500 to \$25,000 (Maryland Criminal Law Article § 7-104)

Exploitation of a Vulnerable Adult (Maryland Criminal Law Article § 8-801(b))

Theft \$1,000 to \$10,000 (Maryland Criminal Law Article § 7-104)

Embezzlement (Maryland Criminal Law Article § 7-113(a)(1))

Exploitation of a Vulnerable Adult (Maryland Criminal Law Article § 8-801(b))

Theft \$1,500 to \$25,000 (Maryland Criminal Law Article § 7-104)

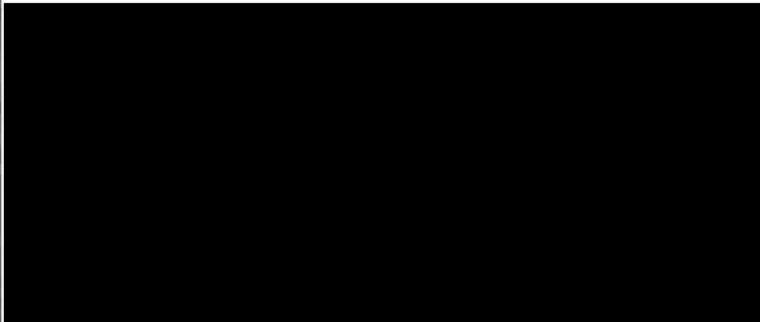
Embezzlement (Maryland Criminal Law Article § 7-113(a)(1))

Embezzlement (Maryland Criminal Law Article § 7-113(a)(1))

Embezzlement (Maryland Criminal Law Article § 7-113(a)(1))

Willful Filing of False Tax Return (Maryland Tax-General Article §13-1002(b))

Theft \$1,000 to \$10,000 (Maryland Criminal Law Article § 7-104)



STATE OF MARYLAND

*

IN THE

v.

*

CIRCUIT COURT

BARBARA JEAN PARKER

*

FOR BALTIMORE CITY

Defendant

*

CASE NO: **119133020**

INDICTMENT

The Grand Jurors for the State of Maryland for Baltimore City charge:

COUNT ONE

**(OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM WITHOUT A
LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Barbara Jean Parker, from as early as 2014 through the present, in Baltimore City, Maryland, unlawfully did knowingly and willfully operate, maintain, and own an assisted living program without a license at 2817 Ulman Avenue, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)

CJIS Code: 1_0557

Felony: 5 years and/or \$10,000 for a first offense

COUNT TWO
**(OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM WITHOUT A
LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Barbara Jean Parker, from as early as 2014 through 2017, in Baltimore City, Maryland, unlawfully did knowingly and willfully operate, maintain, and own an assisted living program without a license at 2815 Ulman Avenue, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)
CJIS Code: 1_0557
Felony: 5 years and/or \$10,000 for a first offense

COUNT THREE
**(OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM WITHOUT A
LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Barbara Jean Parker, from as early as 2014 through the fall of 2017, in Baltimore City, Maryland, unlawfully did knowingly and willfully operate, maintain, and own an assisted living program without a license at 1010 Walnut Avenue, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)
CJIS Code: 1_0557
Felony: 5 years and/or \$10,000 for a first offense

COUNT FOUR
**(OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM WITHOUT A
LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Barbara Jean Parker, from as early as 2014 through 2017, in Baltimore City, Maryland, unlawfully did knowingly and willfully operate, maintain, and own an assisted living program without a license at 3727 Overview Road, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)
CJIS Code: 1_0557
Felony: 5 years and/or \$10,000 for a first offense

COUNT FIVE
**(OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM WITHOUT A
LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Barbara Jean Parker, from as early as 2014 through 2017, in Baltimore City, Maryland, unlawfully did knowingly and willfully operate, maintain, and own an assisted living program without a license at 4636 Shamrock Avenue, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)
CJIS Code: 1_0557
Felony: 5 years and/or \$10,000 for a first offense

COUNT SIX
**(CONSPIRACY TO OPERATE, MAINTAIN, OR OWN AN ASSISTED LIVING PROGRAM
WITHOUT A LICENSE)**

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Barbara Jean Parker, from as early as 2013 through the present, in Baltimore City, Maryland, unlawfully did conspire with Sharon Isaac and Iesha Parker to knowingly and willfully operate, maintain, and own assisted living programs without a license, in violation of Section 19-1809(a)(1) of the Health-General Article of the Annotated Code of Maryland, in violation of the Common Law; against the peace, government, and dignity of the State.

Common Law and Annotated Code of Maryland, Health-General Article, § 19-1809(a)(1)
CJIS Code: 1C0557
Misdemeanor: 5 years and/or \$10,000 for a first offense

COUNT SEVEN
(THEFT SCHEME \$1,500 TO \$25,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Barbara Jean Parker, between as early as 2013 and the present, in Baltimore City and Baltimore County, Maryland, unlawfully did, pursuant to one scheme and continuing course of conduct, steal U.S. currency, property of another, including but not limited to [REDACTED] the value of the property being \$1,500 or more but less than \$25,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_1160
Felony: 5 Years and/or \$10,000

COUNT EIGHT
(EXPLOITATION OF A VULNERABLE ADULT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Barbara Jean Parker, from on or about January 2018 through on or about July 11, 2018, in Baltimore City, Maryland, unlawfully did knowingly and willfully obtain by deception, intimidation, and undue influence the property of [REDACTED] an individual that Barbara Jean Parker knew and reasonably should have known is a vulnerable adult, with intent to deprive the vulnerable adult of the vulnerable adult's property, the value of the property being \$1,500 or more but less than \$25,000, in violation of Section 8-801(b) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-801(b)
CJIS Code: 1_1388
Felony: 5 years and/or \$10,000 fine

COUNT NINE
(THEFT \$1,500 TO \$25,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Barbara Jean Parker, from on or about January 2018 through on or about July 11, 2018, through the present, in Baltimore City, Maryland, unlawfully did steal U.S. currency, property of [REDACTED], the value of the property being \$1,500 or more but less than \$25,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_1136
Felony: 5 Years and/or \$10,000

COUNT TEN
(EMBEZZLEMENT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Barbara Jean Parker, from on or about January 2018 through on or about July 11, 2018, in Baltimore City, Maryland, unlawfully did, being a fiduciary of [REDACTED], fraudulently and willfully appropriate U.S. currency that Barbara Jean Parker held in a fiduciary capacity, contrary to the requirements of Barbara Jean Parker's fiduciary trust responsibility, in violation of Section 7-113(a)(1) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-113(a)(1)

CJIS Code: 1_2799

Misdemeanor: Not less than 1 year and not exceeding 5 years

COUNT ELEVEN
(EMBEZZLEMENT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Barbara Jean Parker, from on or about January 2012 through on or about January 2016, in Baltimore City, Maryland, unlawfully did, being a fiduciary of [REDACTED], fraudulently and willfully appropriate U.S. currency that Barbara Jean Parker held in a fiduciary capacity, contrary to the requirements of Barbara Jean Parker's fiduciary trust responsibility, in violation of Section 7-113(a)(1) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-113(a)(1)

CJIS Code: 1_2799

Misdemeanor: Not less than 1 year and not exceeding 5 years

COUNT TWELVE
(EMBEZZLEMENT)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Barbara Jean Parker, from on or about April 2012 through on or about October 2014, in Baltimore City, Maryland, unlawfully did, being a fiduciary of [REDACTED], fraudulently and willfully appropriate U.S. currency that Barbara Jean Parker held in a fiduciary capacity, contrary to the requirements of Barbara Jean Parker's fiduciary trust responsibility, in violation of Section 7-113(a)(1) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-113(a)(1)

CJIS Code: 1_2799

Misdemeanor: Not less than 1 year and not exceeding 5 years

COUNT THIRTEEN
(WILLFUL FILING OF FALSE TAX RETURN)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Barbara Jean Parker, on April 18, 2017, in Baltimore City, Maryland, unlawfully did willfully file a false income tax return for taxable year 2016 with the intent to evade the payment of tax due under the Tax-General Article, in violation of Section 13-1002(b) of the Tax-General Article, of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Tax-General Article, § 13-1002(b), and Criminal Law Article, § 9-101(a)(2)

CJIS Code: unknown

Misdemeanor: 10 years

COUNT FOURTEEN
(THEFT \$1,000 TO \$10,000)

The Grand Jurors for the State of Maryland for the body of Baltimore City, do upon their oaths and affirmations, present that Barbara Jean Parker, from on or about February 25, 2015, to on or about April 18, 2017, in Baltimore City, Maryland, unlawfully did steal U.S. currency, property of the State of Maryland, the value of the property being \$1,000 or more but less than \$10,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104

CJIS Code: 1_0622

Felony: 10 Years and/or \$10,000



BRIAN E. FROSH
Attorney General of Maryland



JARED I. ALBERT
Assistant Attorney General
CPF# 1312170013
Office of the Attorney General
200 St. Paul Place, 18th Floor
Baltimore, Maryland 21202
(410) 576-6581

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY

STATE OF MARYLAND

v.

BARBARA JEAN PARKER

2817 Ulman Avenue

Baltimore, Maryland 21215

DOB: [REDACTED] SID: [REDACTED], FBI/UCN: [REDACTED]

Tracking Number 19-7003-01229-0

[REDACTED] (TRUE BILL)

19-7003-01229-0

GRAND JURY FOREPERSON

FILED: May 15, 2019

CHARGES:

Identity Fraud \$1,500 to \$25,000 (Maryland Criminal Law Article § 8-301(c)(2)(i))

Theft Scheme \$1,500 to \$25,000 (Maryland Criminal Law Article § 7-104)

Conspiracy—Theft \$1,500 to \$25,000 (Common Law)

Identity Fraud \$100 to \$1,500 (Maryland Criminal Law Article § 8-301(c)(2)(i))

Theft Scheme \$100 to \$1,500 (Maryland Criminal Law Article § 7-104)

FILED MAY 15 2019

STATE OF MARYLAND

*** IN THE**

v.

*** CIRCUIT COURT**

BARBARA JEAN PARKER

*** FOR BALTIMORE COUNTY**

Defendant

*** CASE NO:**

INDICTMENT

The Grand Jurors for the State of Maryland for Baltimore County charge:

COUNT ONE
(IDENTITY FRAUD \$1,500-\$25,000)

The Grand Jurors for the State of Maryland for the body of Baltimore County, do upon their oaths and affirmations, present that Barbara Jean Parker, from on or about May 19, 2016, through on or about July 23, 2018, in Baltimore County, Maryland, unlawfully did knowingly and willfully assume the identity of another, to wit: [REDACTED], with fraudulent intent to obtain a benefit, credit, good, service, and other item of value, to wit: food, the value of the property being \$1,500 or more but less than \$25,000, in violation of Section 8-301(c)(2)(i) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-301(c)(2)(i)
CJIS Code: 1_1368
Felony: 5 years and/or \$10,000 fine

COUNT TWO
(THEFT SCHEME \$1,500-\$25,000)

The Grand Jurors for the State of Maryland for the body of Baltimore County, do upon their oaths and affirmations, present that Barbara Jean Parker, from on or about May 19, 2016, through on or about July 23, 2018, in Baltimore County, Maryland, unlawfully did, pursuant to one scheme and continuing course of conduct, steal U.S. currency, property of [REDACTED] and the Maryland Department of Human Services, the value of the property being \$1,500 or more but less than \$25,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_1160
Felony: 5 years and/or \$10,000 fine

COUNT THREE
(CONSPIRACY-THEFT \$1,500-\$25,000)

The Grand Jurors for the State of Maryland for the body of Baltimore County, do upon their oaths and affirmations, present that Barbara Jean Parker, from on or about May 19, 2016, through on or about July 23, 2018, in Baltimore County, Maryland, unlawfully did conspire with Sharon Isaac to steal U.S. currency, property of [REDACTED] and the Maryland Department of Human Services, the value of the property being \$1,500 or more but less than \$25,000, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1C1136
Misdemeanor: 5 years and/or \$10,000 fine

COUNT FOUR
(IDENTITY FRAUD \$100-\$1,500)

The Grand Jurors for the State of Maryland for the body of Baltimore County, do upon their oaths and affirmations, present that Barbara Jean Parker, from on or about April 19, 2017, through on or about November 4, 2018, in Baltimore County, Maryland, unlawfully did knowingly and willfully assume the identity of another, to wit: [REDACTED] with fraudulent intent to obtain a benefit, credit, good, service, and other item of value, to wit: Sam's Club membership services, the value of the property being \$100 or more but less than \$1,500, in violation of Section 8-301(c)(2)(i) of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 8-301(c)(2)(i)
CJIS Code: 1_1368
Misdemeanor: 1 year and/or \$500 fine

COUNT FIVE
(THEFT SCHEME \$100-\$1,500)

The Grand Jurors for the State of Maryland for the body of Baltimore County, do upon their oaths and affirmations, present that Barbara Jean Parker, from on or about April 19, 2017, through on or about November 4, 2018, in Baltimore County, Maryland, unlawfully did, pursuant to one scheme and continuing course of conduct, steal Sam's Club membership services, property of [REDACTED], Sam's Club, and Sam's West, Inc., the value of the services being \$100 or more but less than \$1,500, in violation of Section 7-104 of the Criminal Law Article of the Annotated Code of Maryland; against the peace, government, and dignity of the State.

Annotated Code of Maryland, Criminal Law Article, § 7-104
CJIS Code: 1_1161
Misdemeanor: 6 months and/or \$500 fine



BRIAN E. FROSH

Attorney General of Maryland



JARED I. ALBERT

Assistant Attorney General

CPF# 1312170013

Office of the Attorney General

200 St. Paul Place, 18th Floor

Baltimore, Maryland 21202

(410) 576-6581