

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.) CRIMINAL CASE NO. CCB-19-094
KEITH ALLEN GLADSTONE,)
Defendant.)
_____)

Friday, May 31, 2019
Courtroom 7D
Baltimore, Maryland

BEFORE: THE HONORABLE CATHERINE C. BLAKE, JUDGE

REARRAIGNMENT

For the Plaintiff:

Leo Wise, Esquire
Assistant United States Attorney

For the Defendant:

David B. Irwin, Esquire

Also Present:

TFO Todd Moody, FBI

Reported by:

Douglas J. Zweizig, RDR, CRR, FCRR
Federal Official Court Reporter
101 W. Lombard Street, 4th Floor
Baltimore, Maryland 21201

P R O C E E D I N G S

(2:17 p.m.)

THE COURT: Good afternoon, everyone. You can be seated, please.

Do you want to call the case, Mr. Wise.

MR. WISE: Thank you, Your Honor.

The case is United States of America versus Keith Gladstone, Criminal No. CCB-19-094.

Leo Wise for the United States. And with me at counsel table is Task Force Officer Todd Moody of the FBI.

THE COURT: All right. Thank you.

MR. IRWIN: Stand up, Mr. Gladstone.

Good afternoon, Your Honor. David B. Irwin here on behalf of Mr. Gladstone, who's present in court.

THE COURT: All right. Thank you.

And if Mr. Gladstone is ready to proceed, Ms. Moyé.

THE CLERK: Please raise your right hand.

KEITH ALLEN GLADSTONE, SWORN

THE CLERK: Please state your full name for the record.

THE DEFENDANT: Keith Allen Gladstone.

THE CLERK: What is your age?

THE DEFENDANT: I am 51 years old. I'm sorry, 52 years old.

THE CLERK: 52.

1 What is your year of birth? Just the year, please.

2 **THE DEFENDANT:** '67.

3 **THE CLERK:** Mr. Gladstone, on March 5th of this year,
4 you were arraigned and pled not guilty to Counts 1, 2, and 3 of
5 the indictment.

6 Do you wish to change your plea of not guilty?

7 **THE DEFENDANT:** Yes.

8 **THE CLERK:** Which count or counts --

9 **MR. IRWIN:** Your Honor, we'd be -- I'm sorry, we'd
10 be --

11 **THE CLERK:** Which count or counts will you be pleading
12 guilty to, Mr. Gladstone?

13 **MR. IRWIN:** Count 1.

14 **THE DEFENDANT:** Count 1.

15 **THE CLERK:** The plea is guilty as to Count 1 and not
16 guilty as to Counts 2 and 3; is that correct, Mr. Gladstone?

17 **THE DEFENDANT:** Yes.

18 **THE CLERK:** Thank you.

19 **THE COURT:** So, Mr. Gladstone, what I need to do is to
20 ask you a series of questions just to make sure that you know
21 what you're doing.

22 **THE DEFENDANT:** Yes, Your Honor.

23 **THE COURT:** All right. If you don't understand any of
24 my questions or just if for any reason you'd like a chance to
25 talk to your attorney, just let me know; all right?

1 **THE DEFENDANT:** Yes, Your Honor.

2 **THE COURT:** All right, sir. Do you understand you are
3 under oath, so if you knowingly give a false answer to any of
4 my questions, you could be prosecuted for false declaration or
5 perjury?

6 **THE DEFENDANT:** Yes.

7 **THE COURT:** Okay. How far did you go in school, sir?

8 **THE DEFENDANT:** High school, Your Honor.

9 **THE COURT:** All right. I take it you were able to
10 read and understand the charges against you and the plea letter
11 in this case?

12 **THE DEFENDANT:** Yes, Your Honor.

13 **THE COURT:** Great.

14 In the past 24 hours, have you taken any drugs or
15 alcohol or medication of any kind?

16 **THE DEFENDANT:** Yes, Your Honor. Just prescribed
17 medication.

18 **THE COURT:** Prescribed medication. Okay.

19 **THE DEFENDANT:** Yeah.

20 **THE COURT:** Okay. And you've taken it in accordance
21 with the prescription?

22 **THE DEFENDANT:** Yes, Your Honor.

23 **THE COURT:** All right. Are you having any difficulty
24 understanding what's going on here today?

25 **THE DEFENDANT:** No, I -- I fully understand what's

1 going on.

2 **THE COURT:** Okay. All right. So the charge that
3 you're pleading guilty to, Count 1 of the indictment, is a
4 conspiracy to deprive person of civil rights.

5 Do you understand there are several things the
6 Government would have to prove beyond a reasonable doubt if the
7 case went to trial?

8 First of all, the Government would have to prove that
9 during or pretty close to the times that are alleged in the
10 indictment, that you did enter into a conspiracy -- which is
11 just an agreement -- to injure, oppress, threaten, or
12 intimidate the person identified as D.S.

13 They would have to prove that you intended to
14 interfere with his exercise or enjoyment of a right that is
15 secured or protected by the Constitution and laws of the
16 United States; specifically, that is the right not to be
17 deprived of liberty without due process of the law, and that
18 includes the right not to be deprived of liberty on the basis
19 of false evidence intentionally presented against him by
20 someone acting under color of state law.

21 And so the Government would have to prove that you did
22 all that knowingly, voluntarily, and willfully and that at the
23 time, the individual identified as D.S. was present in a state,
24 district, or territory of the United States.

25 Do you understand that's what the Government would

1 have to prove on Count 1?

2 **THE DEFENDANT:** Yes, Your Honor.

3 **THE COURT:** All right. In terms of the possible
4 penalties, do you understand that the maximum penalty for
5 Count 1 is ten years in prison; there could be a period of
6 supervised release of as much as three years; there's a fine,
7 could be as much as \$250,000; and there's a required \$100
8 special assessment?

9 Do you understand those?

10 **THE DEFENDANT:** Yes, Your Honor.

11 **THE COURT:** All right, sir. I mentioned supervised
12 release. That's a term of years that can be imposed to follow
13 whatever prison term you might get.

14 While you're on supervised release, you have to follow
15 the rules and regulations of supervised release, not commit any
16 new offense.

17 If you violate any condition of supervised release, if
18 the Government proved that to me, you could get put back in
19 prison for the full term of the supervised release without
20 getting any credit for the time you were out.

21 Even if that somehow meant you spent more time in jail
22 than would otherwise be the maximum, that's how supervised
23 release works. If you violate it, you could go back to jail
24 for the full term.

25 Do you understand that?

1 **THE DEFENDANT:** Yes, Your Honor.

2 **THE COURT:** All right, sir.

3 Do you understand you're subject to what are called
4 the sentencing guidelines that have been issued by the
5 United States Sentencing Commission? They are advisory, but I
6 have to calculate them and take them into account, deciding on
7 a reasonable sentence in your case.

8 The advisory guideline range depends on a variety of
9 things: The type of the offense and your role in the offense.

10 Do you understand I just have to calculate them and
11 take them into account?

12 **THE DEFENDANT:** I understand, Your Honor.

13 **THE COURT:** All right. Do you understand that under
14 the law -- and this may be changed somewhat by your plea
15 agreement -- but under the law, if you think I make a mistake
16 deciding on the sentence, you have the right to appeal?

17 The same is true for the Government, ordinarily under
18 the law if the Government thinks I make a mistake deciding on
19 the sentence, then the Government has the right to appeal.

20 Do you understand that?

21 **THE DEFENDANT:** Yes, Your Honor.

22 **THE COURT:** Okay. Now, when you plead guilty, you're
23 giving up some very important rights. I'm sure you're aware of
24 that and have discussed that with counsel.

25 But I need to go through some of them with you just to

1 make sure you're giving them up voluntarily.

2 So you do understand that you have a right to continue
3 to plead not guilty to this charge?

4 **THE DEFENDANT:** Yes, Your Honor.

5 **THE COURT:** Do you understand you have a right to a
6 trial by a jury?

7 **THE DEFENDANT:** Yes, Your Honor.

8 **THE COURT:** Do you understand if you were willing to
9 give up your right to a trial by a jury, and if the Government
10 also was willing to give up its right to a trial by a jury, you
11 could be tried just by a United States District Judge, you
12 could have a judge trial without a jury, if you wanted one?

13 Do you understand that?

14 **THE DEFENDANT:** Yes, Your Honor.

15 **THE COURT:** All right, sir. Do you understand that if
16 you did want to go to trial, you would continue to have the
17 right to be represented by counsel? Just as you are now, he
18 would stick with you.

19 And at any point if you cannot afford a lawyer, then
20 one is appointed to represent you at the Government's expense.

21 Do you understand that?

22 **THE DEFENDANT:** Yes, Your Honor.

23 **THE COURT:** All right, sir. Do you understand if you
24 went to trial, you would be presumed innocent, the burden would
25 be on the Government to prove your guilt beyond a reasonable

1 doubt?

2 **THE DEFENDANT:** Yes, Your Honor.

3 **THE COURT:** And do you understand if you went to
4 trial, you or your attorney would have the right to
5 cross-examine; in other words, he could ask questions of any
6 witness who testified against you?

7 And if you went to trial, you would have the right to
8 make people come in and testify on your behalf. If someone had
9 some helpful evidence to give for you, you could have a summons
10 or a subpoena issued to make them come in and testify.

11 Do you understand that?

12 **THE DEFENDANT:** Yes, Your Honor.

13 **THE COURT:** All right, sir. Do you understand that if
14 you did go to trial, you personally would have the right to
15 take the witness stand and testify if you wanted to; but if you
16 did not want to testify, for whatever reason, no one could
17 force you or make you testify?

18 Do you understand that?

19 **THE DEFENDANT:** I understand, Your Honor.

20 **THE COURT:** All right, sir. Do you also understand if
21 you decided not to testify, for whatever reason, no one,
22 including the jury, could hold that against you in any way,
23 they could not decide anything bad about your case or
24 specifically that you were guilty just because you decided not
25 to testify?

1 Do you understand that?

2 **THE DEFENDANT:** Yes, Your Honor.

3 **THE COURT:** All right, sir. Do you understand if you
4 did choose to be tried by a jury, in order for you to be
5 convicted, the jury's verdict would have to be unanimous?
6 There would be 12 jurors. They would all have to agree that
7 you had been proved guilty beyond a reasonable doubt.

8 Do you understand that?

9 **THE DEFENDANT:** Yes, Your Honor.

10 **THE COURT:** Do you understand that when you plead
11 guilty, you're giving up each and every one of those rights,
12 there will be no further trial of any kind, and you will be
13 sentenced based on your guilty plea?

14 Do you understand that?

15 **THE DEFENDANT:** Yes, Your Honor.

16 **THE COURT:** And, finally, do you understand that when
17 you plead guilty, you're giving up your right to try to
18 suppress any statements you might have made, keep something out
19 of evidence that might have been taken from you, pretrial
20 motions; in other words, any defense that you might have to
21 this charge, you give it up when you plead guilty?

22 Do you understand that?

23 **THE DEFENDANT:** Yes, Your Honor, I do.

24 **THE COURT:** All right, sir.

25 Now, I do have a plea agreement letter here in front

1 of me dated May 10th of 2019, addressed to Mr. Irwin. It
2 appears to have your signature at the end on Page 7.

3 Do you have a copy of that that you can look at?

4 **THE DEFENDANT:** I do, Your Honor.

5 **THE COURT:** All right. On Page 7, directly above your
6 signature, it says, "I have read this agreement, including the
7 sealed supplement, and carefully reviewed every part of it with
8 my attorney. I understand it and I voluntarily agree to it.
9 Specifically, I have reviewed the factual and advisory
10 guideline stipulation with my attorney, and I do not wish to
11 change any part of it. I am completely satisfied with the
12 representation of my attorney."

13 Is that all correct, Mr. Gladstone?

14 **THE DEFENDANT:** That is correct, Your Honor.

15 **THE COURT:** Great.

16 And regarding the representation that Mr. Irwin's been
17 providing to you, is there anything you think he should have
18 done that he hasn't done or anything else you need to ask him
19 about right now?

20 **THE DEFENDANT:** No, Your Honor. He's done exactly
21 what I needed.

22 **THE COURT:** Okay. Great.

23 Well, we'll go back to the beginning of the letter. I
24 want to summarize it with you.

25 First let me ask whether anyone has used any force or

1 made any threats against you or against anyone else to get you
2 to enter into this plea?

3 **THE DEFENDANT:** No, Your Honor.

4 **THE COURT:** Okay. The letter says you're pleading
5 guilty to Count 1, conspiracy to deprive D.S. of his
6 civil rights.

7 Paragraph 2 explains what the elements of the offense
8 are. We talked about that.

9 Paragraph 3, the penalties.

10 Paragraph 4 discusses the rights you're giving up by
11 pleading guilty, which may include certain valuable
12 civil rights.

13 And if you were not a U.S. citizen, you might be
14 subject to deportation or other loss of immigration status.

15 Paragraph 5 tells you that I have to determine an
16 advisory guideline range and take it into account in connection
17 with sentencing.

18 And Paragraph 6 refers to a statement of facts. So
19 let me just go to that.

20 There is an Attachment A, which is 8, 9, and 10,
21 appears to have your signature on Page 10.

22 Did you read and sign the statement of facts as well?

23 **THE DEFENDANT:** I did, Your Honor.

24 **THE COURT:** All right. And you've agreed that the
25 Government could prove beyond a reasonable doubt everything

1 that is in this. And I'm just going to do a brief summary.

2 It recites that there's a Baltimore Police Department,
3 that sworn members must abide by the Law Enforcement Officers'
4 Code of Ethics; that you were a police officer at relevant
5 times.

6 Then specifically in March of 2014, when you got a
7 call from a sergeant who had run over a D.S. and asked to -- he
8 spoke with you, and the inquiry appeared to be about getting a
9 gun. You asked a different officer if he had a BB gun; he did
10 not.

11 You then went to another officer's home and got a
12 BB gun, went to the site of the arrest, and dropped it close to
13 the vehicle there and let the sergeant know that it was there.
14 It was ultimately recovered.

15 And D.S. was charged with various things, including
16 for that gun that, in fact, you had brought to the scene of the
17 arrest.

18 And there was a false statement of charges written.

19 D.S. was detained for a period of time, until at least
20 April 2nd of 2014.

21 The charges against him ultimately were disposed of by
22 a nolle pros.

23 There were then arrests of various members of the
24 Gun Trace Task Force, including Sergeant 1.

25 You subsequently, in January, had a meeting with

1 Officer 1 relating to the arrest and whether there was anything
2 to worry about and suggested that Officer 1 tell something to
3 law enforcement that was not correct.

4 So that's a summary. I didn't read it word for word.

5 But you did read it word for word, Mr. Gladstone?

6 **THE DEFENDANT:** I did, Your Honor.

7 **THE COURT:** All right. And do you agree that you did
8 what it says in there you did and it's an accurate statement of
9 the facts?

10 **THE DEFENDANT:** I do, Your Honor.

11 **THE COURT:** So you agree that you are guilty of this
12 offense?

13 **THE DEFENDANT:** I do agree I am guilty.

14 **THE COURT:** All right, sir.

15 Going back to the letter in Paragraph 6, you have an
16 agreement with the Government about the guidelines. You
17 believe that the base offense level will be a 12; an increase
18 of six because it was committed under the color of law -- you
19 were a police officer; and an aggravating role as well applies,
20 an obstruction of justice. So it's a total of 22.

21 There is also an agreement, however, for a three-level
22 downward adjustment for your acceptance of responsibility, as
23 long as there's no violation of the plea agreement between now
24 and sentencing.

25 Paragraph 9 says that at the time of sentencing, both

1 you and the Government can argue for whatever you think is a
2 reasonable sentence under the law and give me any information
3 that would be helpful for me to make that decision. And the
4 U.S. Attorney will then move to dismiss the open counts against
5 you.

6 Now, Paragraph 10 does deal with your appeal rights.

7 And, first of all, you're giving up your right to
8 appeal your conviction; in other words, your guilty plea today
9 will be your conviction of this charge, and you're giving up
10 your right to appeal it.

11 And both you and the Government are giving up the
12 right that I previously mentioned to appeal the sentence unless
13 somehow it was over the statutory maximum. Of course, you
14 could then appeal. But other than that, you're both giving up
15 your right to appeal.

16 And then it says that you're giving up your rights
17 under the Freedom of Information Act. That just means you
18 won't be asking for more documents about the case.

19 Paragraph 13 tells you that if you violate the plea
20 agreement in some way between now and sentencing, if you
21 committed some new offense or failed to accept responsibility,
22 if the Government proved that to me, then they would be free of
23 their obligations to you under this agreement and you would not
24 necessarily be allowed to withdraw your plea.

25 And Paragraph 11 just tells you the Court is not a

1 party to the agreement. I didn't sign the letter.

2 I do have an independent responsibility, with the help
3 of the presentence report, to decide what I think the facts are
4 that are relevant to sentencing, what the guideline range is,
5 and ultimately what a reasonable sentence is. And I don't -- I
6 am looking at Paragraph 11 and I'm looking at the last sentence
7 in Paragraph 11.

8 **MR. WISE:** I think that's an artifact, Your Honor,
9 from the last --

10 **THE COURT:** I assume that should be stricken out --

11 **MR. WISE:** Yes.

12 **THE COURT:** -- a reference to 151 months.

13 **MR. WISE:** Yes.

14 **THE COURT:** I'm going to take out the last two
15 sentences in -- well, the last one sentence in Paragraph 11.

16 Is that agreeable, Mr. Irwin?

17 **MR. IRWIN:** Agreed.

18 **THE COURT:** Okay. Now, what Paragraph 11 actually
19 says is that I don't have to accept the U.S. Attorney's
20 recommendation. I don't have to accept your counsel's
21 recommendation. I can impose any lawful sentence, up to the
22 maximum.

23 And if I don't accept counsel's recommendation, that
24 does not mean you can withdraw your guilty plea. So nobody can
25 make you an absolutely binding promise of what the sentence is

1 going to be.

2 And then it says that, in Paragraph 12, this is the
3 complete plea agreement, together with the sealed supplement.

4 Now, we have a policy in this district of having a
5 sealed supplement in every case discussing cooperation, whether
6 or not a defendant is cooperating. So what I'm about to say
7 will remain under seal if a transcript of the proceeding is
8 ordered.

9 Conference at the bench.

10 (It is the policy of this court that every guilty plea and
11 sentencing proceeding include a bench conference concerning
12 whether the defendant is or is not cooperating.)

13 **THE COURT:** All right. So that was a summary of the
14 plea agreement.

15 Anything that needs to be added, modified, commented
16 on, Mr. Wise?

17 **MR. WISE:** I don't believe so, Your Honor. Thank you.

18 **THE COURT:** Okay. Mr. Irwin?

19 **MR. IRWIN:** No, Your Honor.

20 **THE COURT:** Mr. Gladstone, most important, I didn't
21 read this word for word. But as far as you're concerned, was
22 that an accurate summary of what you think your agreement with
23 the Government is?

24 **THE DEFENDANT:** Yes, Your Honor.

25 **THE COURT:** All right. Let me ask it another way: Is

1 there anything else that's been promised to you, any reward,
2 any benefit, anything you expect to get in exchange for your
3 guilty plea besides what's in the letter?

4 **THE DEFENDANT:** No, Your Honor.

5 **THE COURT:** Okay. Any questions at all, sir, for me
6 or for your counsel about your guilty plea or the terms of your
7 plea agreement?

8 **THE DEFENDANT:** No, Your Honor, I have no questions.

9 **THE COURT:** All right, sir.

10 Well, based on everything you've said and what counsel
11 have said and reviewing the record, I'm going to find that
12 you're competent to enter this guilty plea.

13 I believe you understand the charge against you and
14 the penalties you're subject to.

15 I'll find that you understand the rights that you're
16 giving up by pleading guilty, that you're doing this
17 voluntarily, and there is a factual basis for your entry of the
18 plea. So I'm accepting your plea of guilty to Count 1.

19 I have a regular sentencing order in front of me.

20 And just to confirm, I believe Mr. Gladstone is on
21 release conditions --

22 **MR. WISE:** That's correct, Your Honor.

23 **THE COURT:** -- which are all satisfactory. So he
24 would be continued on the same release conditions pending
25 sentencing.

1 **MR. IRWIN:** Thank you, Your Honor.

2 **THE COURT:** Given the regular scheduling order taking
3 us into August and some general calendar issues, is there any
4 difficulty with having the sentencing in early September?

5 **MR. WISE:** No, Your Honor, not from the United States.

6 **MR. IRWIN:** Your Honor, one thing. I know you do a
7 lot of things on Friday.

8 On my bucket list is a game at LSU at Texas at the
9 Darrell Royal Stadium on Friday, August 6th, that I've wanted
10 to do ever since my mother was a Texas -- went to the
11 University of Texas. So I won't be here on Friday, August --
12 September 6th.

13 **THE COURT:** September 6th, I was going to say. Okay.
14 That's fine. I'm actually looking in the second week.

15 Would Friday, September 13th at 9:15 be available? Or
16 you don't want Friday the 13th?

17 **MR. IRWIN:** Aside from my natural superstitious
18 card/poker-playing superstitions, September 13th is fine.

19 **MR. WISE:** That's fine with me, Your Honor.

20 **THE COURT:** Okay.

21 **MR. WISE:** Your Honor, what time on the 13th?

22 **THE COURT:** I said 9:15.

23 **MR. WISE:** Thank you.

24 **THE COURT:** I was just going to say it again. I've
25 just signed the sentencing order. Sentencing is September 13th

1 at 9:15 in the morning. The other dates are in the memo.

2 And if there is any complication with that date,
3 you'll let me know.

4 Anything else at this point?

5 **MR. WISE:** Not from the United States, Your Honor.

6 Thank you.

7 **MR. IRWIN:** No, Your Honor.

8 Mr. Gladstone was processed on his initial appearance,
9 so I don't believe there's anything else we need to do
10 downstairs today.

11 **THE COURT:** Sure. Yes, I understand. I assumed he
12 probably was.

13 And he's continuing, as we said, on the same release
14 conditions. So that's fine for today. Thank you.

15 **MR. IRWIN:** Thank you very much, Your Honor. Have a
16 nice weekend.

17 (Court adjourned at 2:41 p.m.)

18 I, Douglas J. Zweizig, RDR, CRR, FCRR, do hereby certify
19 that the foregoing is a correct transcript from the
20 stenographic record of proceedings in the above-entitled
21 matter.

22 _____
/s/

23 Douglas J. Zweizig, RDR, CRR, FCRR
24 Registered Diplomate Reporter
25 Certified Realtime Reporter
Federal Official Court Reporter

DATE: August 10, 2020

<p>MR. IRWIN: [10] 2/12 3/9 3/13 16/17 17/19 19/1 19/6 19/17 20/7 20/15 MR. WISE: [11] 2/6 16/8 16/11 16/13 17/17 18/22 19/5 19/19 19/21 19/23 20/5 THE CLERK: [9] 2/17 2/19 2/22 2/25 3/3 3/8 3/11 3/15 3/18 THE COURT: [54] THE DEFENDANT: [42]</p>	<p>A</p> <p>abide [1] 13/3 able [1] 4/9 about [9] 9/23 11/19 12/8 13/8 14/2 14/16 15/18 17/6 18/6 above [2] 11/5 20/20 above-entitled [1] 20/20 absolutely [1] 16/25 accept [4] 15/21 16/19 16/20 16/23 acceptance [1] 14/22 accepting [1] 18/18 accordance [1] 4/20 account [3] 7/6 7/11 12/16 accurate [2] 14/8 17/22 Act [1] 15/17 acting [1] 5/20 actually [2] 16/18 19/14 added [1] 17/15 addressed [1] 11/1 adjourned [1] 20/17 adjustment [1] 14/22 advisory [4] 7/5 7/8 11/9 12/16 afford [1] 8/19 afternoon [2] 2/3 2/13 again [1] 19/24 against [9] 4/10 5/19 9/6 9/22 12/1 12/1 13/21 15/4 18/13 age [1] 2/22 aggravating [1] 14/19 agree [5] 10/6 11/8 14/7 14/11 14/13 agreeable [1] 16/16 agreed [2] 12/24 16/17 agreement [14] 5/11 7/15 10/25 11/6 14/16 14/21 14/23 15/20 15/23 16/1 17/3 17/14 17/22 18/7 alcohol [1] 4/15 all [32] alleged [1] 5/9 ALLEN [3] 1/5 2/18 2/21 allowed [1] 15/24 also [4] 1/20 8/10 9/20 14/21 am [4] 2/23 11/11 14/13 16/6 AMERICA [2] 1/3 2/7 another [2] 13/11 17/25 answer [1] 4/3 any [25] anyone [2] 11/25 12/1 anything [9] 9/23 11/17 11/18 14/1 17/15 18/1 18/2 20/4 20/9 appeal [8] 7/16 7/19 15/6 15/8 15/10 15/12 15/14 15/15 appearance [1] 20/8 appeared [1] 13/8 appears [2] 11/2 12/21 applies [1] 14/19 appointed [1] 8/20 April [1] 13/20 April 2nd [1] 13/20 are [14] 4/2 4/23 5/5 5/9 7/3 7/5 8/17 12/8 14/11 15/11 16/3 16/4 18/23 20/1</p>	<p>argue [1] 15/1 arraigned [1] 3/4 arrest [3] 13/12 13/17 14/1 arrests [1] 13/23 artifact [1] 16/8 as [16] 3/15 3/16 5/12 5/23 6/6 6/6 6/7 6/7 8/17 12/22 14/19 14/22 14/23 17/21 17/21 20/13 Aside [1] 19/17 ask [5] 3/20 9/5 11/18 11/25 17/25 asked [2] 13/7 13/9 asking [1] 15/18 assessment [1] 6/8 Assistant [1] 1/17 assume [1] 16/10 assumed [1] 20/11 Attachment [1] 12/20 Attachment A [1] 12/20 attorney [7] 1/17 3/25 9/4 11/8 11/10 11/12 15/4 Attorney's [1] 16/19 August [4] 19/3 19/9 19/11 20/25 August 6th [1] 19/9 available [1] 19/15 aware [1] 7/23</p> <p>B</p> <p>B. [2] 1/19 2/13 back [4] 6/18 6/23 11/23 14/15 bad [1] 9/23 Baltimore [3] 1/10 1/25 13/2 base [1] 14/17 based [2] 10/13 18/10 basis [2] 5/18 18/17 BB [2] 13/9 13/12 BB gun [2] 13/9 13/12 be [36] because [2] 9/24 14/18 been [5] 7/4 10/7 10/19 11/16 18/1 BEFORE [1] 1/12 beginning [1] 11/23 behalf [2] 2/14 9/8 believe [5] 14/17 17/17 18/13 18/20 20/9 bench [2] 17/9 17/11 benefit [1] 18/2 besides [1] 18/3 between [2] 14/23 15/20 beyond [4] 5/6 8/25 10/7 12/25 binding [1] 16/25 birth [1] 3/1 BLAKE [1] 1/12 both [3] 14/25 15/11 15/14 brief [1] 13/1 brought [1] 13/16 bucket [1] 19/8 burden [1] 8/24</p> <p>C</p> <p>calculate [2] 7/6 7/10 calendar [1] 19/3 call [2] 2/5 13/7</p>
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