

State of Maryland,

City of Baltimore, to wit:

IN THE CIRCUIT COURT FOR BALTIMORE CITY

<p>The State of Maryland</p> <p>-vs-</p> <p>CHRISTOPHER NGUYEN</p> <p>Defendant:</p>
--

Date of offense: **August 12, 2020**

Location: **4200 Block of Kolb Avenue,
Baltimore, Maryland 21206**

CRIMINAL INFORMATION

The State's Attorney for Baltimore City duly authorized by law, on her official oath informs the said Court that the above named DEFENDANT, late of said City, heretofore on or about August 12, 2020, in the 4200 Block Kolb Avenue in the City of Baltimore. State of Maryland, did recklessly engage in conduct, to wit: failure to act as reasonable law enforcement officer, failure to properly supervise, secure or otherwise detain a known suspect, Kenneth Somers, that created a substantial risk of death or serious physical injury to the victim, Wayne Brown, a physically incapacitated individual, in that having already identified the suspect in the assault of the victim, Officer Nguyen failed to secure or properly detain the suspect to protect the victim from further injury as he investigated the assault. Specifically, Officer Nguyen failed to take any action as the suspect ignored Officer Nguyen's questions, exited his truck, and walked unobstructed toward the victim lying motionless and bleeding on the sidewalk. Officer Nguyen followed behind the suspect taking notes and failed to place himself between the suspect and the victim, failed to protect the victim, failed to prevent the suspect from approaching the

unresponsive victim, failed to prevent the suspect from bending down and saying to the victim words to the effect of, "Hey, can you see that? Can you see? So you can remember me," and failed to prevent further harm to the victim by remaining approximately three to five feet away from the victim when the suspect reared back then kicked the unresponsive victim in the head causing his head to thrust backward, in violation of Criminal Law Article, Section 3-204 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

CR Reckless Endangerment, 3-204, CJIS 1-1425

SECOND COUNT

The State's Attorney for Baltimore City duly authorized by law, on her official oath informs the said Court that the above named DEFENDANT, late of said City, heretofore on or about August 12, 2020, in the 4200 Block of Kolb Avenue, City of Baltimore, State of Maryland, did as a duly sworn police officer for the Baltimore City Police Department unlawfully, knowingly, and corruptly fail to act as required in the performance of and under color of authority of his official duties, in violation of the common law, against the peace, government and dignity of the State.

CL Misconduct in Office, CJIS 9X-0042



Marilyn J. Mosby
The State's Attorney for the City of Baltimore

621224002

WITNESSES/VICTIM(S)/OFFICERS

Baltimore Police Department
242 W. 29th Street
Baltimore, MD 21211

Det. Vanessa Simpson
OFC Franklin Phipps
Sgt. Charles Jones
Dionne Thorpe
Francis Lipa

Victim:
Wayne Brown

STATE OF MARYLAND

vs.

Christopher Nguyen
242 West 29th Street
Baltimore, MD 21211
D.O.B. 01/05/1995

BPI# SID#
Trkg.# 03-7024-00937-4
District Ct#: NONE
CC#: 4-200803410

Criminal Information

CHARGES

Reckless Endangerment (CR 3-204)
Misconduct in Office (CL)

ERNEST M. REITZ, #687900
Assistant State's Attorney
Public Trust and Police Integrity Unit

NOTICE TO THE DEFENDANT

1. This paper charges you with committing a crime.
2. If you have been arrested, you have the right to have a judicial officer decide whether you should be released from jail until trial.
3. You have the right to have a lawyer.
4. A lawyer can be helpful to you by:
 - (A) explaining the charges in this paper;
 - (B) telling you the possible penalties;
 - (C) helping you at trial;
 - (D) helping you protect your constitutional rights; and
 - (E) helping you get a fair penalty if convicted.
5. Even if you plan to plead guilty, a lawyer can be helpful.
6. If you want a lawyer but do not have the money to hire one, the Public Defender may provide a lawyer for you. The court clerk will tell you how to contact the Public Defender.
7. If you want a lawyer but you cannot get one and the Public Defender will not provide one for you, contact the court clerk as soon as possible.
8. **DO NOT WAIT UNTIL THE DATE OF YOUR TRIAL TO GET A LAWYER.** If you do not have a lawyer before the trial date, you may have to go to trial without one.

ARR. DATE:

RECEIVED FOR RECORD
CIRCUIT COURT FOR

2021 AUG 12 A 1:07

CRIMINAL DIVISION