State of Maryland,

City of Baltimore, to wit:

IN THE CIRCUIT COURT FOR BALTIMORE CITY

The State of Maryland

-V-

Unique Sheppard

Defendant:

INDICTMENT

The Grand Jury of the State of Maryland for the body of the City of Baltimore, State of Maryland, do on their oath present that the aforesaid Defendant, late of said City, heretofore on or about March 20, 2023 at the intersection of W. Pratt Street and South Mount Street, Baltimore, Maryland 21223, did commit the crimes of Wearing, Carrying, or Transporting a Handgun, Conspiracy to Tamper with Physical Evidence, and Misconduct in Office in violation of the Criminal Law of Maryland; against the peace, government and dignity of the State.

MANNER AND MEANS

Among the manner and means by which the defendant conducted and participated in the acts of Wearing, Carrying, or Transporting a Handgun, Conspiracy to Tamper with Physical Evidence, and Misconduct in Office are as follows:

- 1) On March 20, 2023, at all relevant times, Police Officer Unique Sheppard (hereinafter "Officer Sheppard") was on duty and was a government official for the Baltimore Police Department (hereinafter "BPD").
- 2) That Officer Sheppard's "police powers" were suspended due to an unrelated investigation. Subsequently, Officer Sheppard was restricted to desk duty on the date in question.
- 3) That at some point during her shift, Officer Sheppard left her post and the premises without notifying a supervising officer.
- 4) That at approximately 4:33 pm Officer Sheppard placed a call to 911 and advised that she had been in a vehicle accident at the intersection of W. Pratt and S. Mount Streets in Baltimore City, Maryland.

- 5) That when uniformed officers arrived at the scene, Officer Sheppard was quickly recognized as a BPD officer and she advised that she was currently on duty but she had been driving her personal vehicle at the time of the accident.
- 6) Officer Sheppard's sergeant arrived to the scene and Officer Sheppard admitted that she left her post without the knowledge of her supervisors.
- 7) At all relevant times, Ms. Breshawn Webb (hereinafter "Ms. Webb") was present on the sidewalk when uniformed officers arrived. Ms. Webb advised that she was a friend of Officer Sheppards' and that she was present for "support."
- 8) After speaking with Officer Sheppard, the sergeant conducted a search of the interior of Officer Sheppard's vehicle. During the search, the sergeant recovered a white plastic bag containing two metal grinders containing green plant residue and several pieces of individually wrapped edible cannabis candies with a THC label on them. The sergeant returned the items to the bag, placed the bag on the driver's seat of the vehicle, and continued to search the remainder of the vehicle.
- 9) While the sergeant continued the search of the vehicle, Officer Sheppard reopened the passenger side door of the vehicle, briefly went inside then reemerged and began to text on her cell phone. Moments later, Officer Sheppard "mouthed" something to Ms. Webb. Ms. Webb then walked over to the open passenger door, Officer Sheppard placed herself in front of Ms. Webb, providing cover, while Ms. Webb removed the white plastic bag and left the scene.
- 10) Shortly thereafter, the officers noticed the white plastic bag was no longer in the vehicle. One of the officers advised that the saw Ms. Webb walk away with the bag. At which time the lieutenant on scene ordered Officer Sheppard to call Ms. Webb and tell her to return.
- 11.) While the officers awaited Ms. Webb's return, the sergeant noticed that Officer Sheppard was conducting security checks about her person. Knowing that Officer Sheppard's "police powers" were suspended, the sergeant conducted a search of her person and recovered a loaded handgun from Officer Sheppard's person. Officer Sheppard advised that she did not possess a permit to carry the handgun. Officer Sheppard had no lawful authority to be in possession of the firearm.
- 12.) Ms. Webb returned to the scene with the white plastic bags; however, there items were missing.

All paragraphs herein are incorporated and affirmed as to the following additional counts:

CHARGE

The Grand Jurors, having received evidence supporting paragraphs 1-12 herein, affirming and incorporating said paragraphs, do allege and charge the Defendant, Unique Sheppard:

COUNT 1

The Grand Jurors of the State of Maryland for the body of the City of Baltimore, do present that the aforesaid Defendant, Unique Sheppard, a sworn police officer in the City of Baltimore, State of Maryland, on or about March 20, 2023, at the intersection of S. Mount and W. Pratt Streets in Baltimore City, Maryland did Wear, Carry, and Transport a Handgun, in violation of Criminal Law Article, Section 4-203 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

Wearing, Carrying, & Transporting a Handgun CR § 4-203 CJIS 1-1454

COUNT 2

The Grand Jurors of the State of Maryland for the body of the City of Baltimore do further present that the aforesaid Defendant, Unique Sheppard, a sworn police officer in the City of Baltimore, State of Maryland, on or about <u>March 20, 2023</u>, at <u>the intersection of S. Mount and W. Pratt Streets in Baltimore City, Maryland did <u>Conspire</u> to <u>Tamper with Physical Evidence</u> in violation of the Common Law; against the peace, government and dignity of the State..</u>

Conspiracy [Common Law] 1C-1332 (CR 9-307)

COUNT 3

The Grand Jurors of the State of Maryland for the body of the City of Baltimore, do further present that the aforesaid Defendant, Unique Sheppard, a sworn police officer in the City of Baltimore, State of Maryland, on or about March 20, 2023, at the intersection of S. Mount and W. Pratt Streets in Baltimore City, Maryland while in her official capacity did knowingly, intentionally, and unlawfully commit the crime Misconduct in Office against the peace, government, and dignity of the State..

Misconduct in Office [Common Law] 9X 0042

Respectfully submitted,

Ivan J. Bates

State's Attorney for Baltimore City

The State's Attorney for the City of Baltimore