ARR. DATE:

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.

Gledis Kuperman November 29, 2023 # 1 23 3 3 3 0 0 8

STATE OF MARYLAND

VS.

TIFFANY HARRISON 1816 Braddish Avenue Baltimore, MD 21216 D.O.B. 01/17/1986 BPI# SID# 5457692 Trkg.# 236105057661 District Ct# 4B02482281 CC# 7231009684

Indictment

(TRUE BILL)

.Foreman

Filed

CHARGESASSAULT-FIRST DEGREE

LINDA RAMIREZ 644880

Gun Violence Enforcement Division

OFFICERS

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

- Haywood McMorris K454
- Jorge Perez K287
- Jaylin Vega K903
- Omar Vega K026
- Anthony Shoemaker
- Robert Gaul K589
- Raymond Zwick K465
- Jolardo DeGuzman K796
- Cameron Catron H162
- Joel Brown K501
- Michael Martin K509
- Jose Guerrero J252
- Crime Scene Tech Katrina Schoenfeld
- Baltimore School Police Potter (#506)

WITNESSES

• Khyreau Jeter

9 PM 2: 58

State of Maryland,

City of Baltimore, to wit:

IN THE CIRCUIT COURT FOR BALTIMORE CITY

The State of Maryland

VS
Tiffany Harrison

Defendant(s):

INDICTMENT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about <u>October 27</u>, <u>2023</u>, at <u>2200 Block of Presstman Street</u>, unlawfully did assault in the first degree in violation of Criminal Law Article, Section 3-202 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

CR 3-202 1 1420

FACTS

١.	On October 27, 2023, at shortly before 8:00 a.m., WILLIAM DREDDEN, his son,
	, age 15, and mother, Tiffany HARRISON ("co-
	conspirators") worked in concert to commit a first degree assault on
	striking him repeatedly with a handgun and their fists as he waited for his classes to begin
	at Carver High School. As WILLIAM DREDDEN, and Tiffany
	HARRISON started to leave the area after attacking, fired his
	handgun at , striking with at least two gunshots and also striking
	, who was standing with when began firing.
	, who was struck by bullet(s) fired by was driven away from the scene
	by WILLIAM DREDDEN and Tiffany HARRISON. All events were captured on video.
2.	Shortly before 8:00 a.m. on October 27, 2023, private surveillance video from the 1800

block of Braddish Avenue showed WILLIAM DREDDEN, an adult male wearing a red

hoodie, khaki pants, and red tennis shoes gets into the driver's seat of a silver 2020 Ford Edge SUV parked in the 1800 block of Braddish Avenue; Tiffany HARRISON, an adult female, wearing light blue pants, a black and white plaid shirt, and a long black hair bonnet, and whose home is located in the block, enters the front passenger seat, after which the vehicle pulls away, making a right turn onto Westwood Avenue.

- 3. At approximately 7:45 a.m., a group of approximately ten young people, including and ______, were standing on the sidewalk outside of Carver High School, at the corner of Presstman and Bentalou Streets, waiting for the day's classes to begin.
- 4. At approximately 7:48 a.m., a young male, wearing black pants, a black hoodie with red letters on the front and a white graphic with a red lettering on the back and a black fitted balaclava covering his head and chin, later identified as walks into camera view on Presstman Street from the eastern side of Carver High School toward the corner at Bentalou Street; his mother, Tiffany HARRISON, wearing light blue pants, a black and white plaid shirt and a long black hair bonnet, follows a few paces behind and WILLIAM DREDDEN, wearing a red hoodie with white lettering on the left sleeve with the hood up, khaki pants, and red tennis shoes, initially walks several paces behind HARRISON, then jogs to catch up to and Tiffany HARRISON as they approached the group at the corner.
- 5. walks directly to who is standing with , and appears to speak to him and/or the group; Tiffany HARRISON continues to approach and stands next to her son. begins hitting and WILLIAM DREDDEN runs the last several feet toward the group and pushes the ground; Tiffany HARRISON continues to stand next to her son as he strikes with a handgun held in his right hand. A low wall obscures the lower and the DREDDEN-HARRISON family. portions of several times with the handgun and WILLIAM DREDDEN strikes multiple times with his right fist; Tiffany HARRISON stands by as and WILLIAM DREDDEN continue to beat leaning in, raising and lowering her right arm and hand, seeming to strike who is out of view on the ground behind the wall.

6.	Finally, Tiffany HARRISON starts to walk away, then takes a couple of steps back toward
	the altercation; then starts to walk away with his mother, while
	WILLIAM DREDDEN delivers some final blows to
	HARRISON, and WILLIAM DREDDEN all begin to walk back toward the direction from
	which they had arrived, with
7.	At the start of the altercation and and moved a few feet away and
	stood nearby, watching as and WILLIAM DREDDEN and Tiffany HARRISON
	pistol whip and beat
8.	encounters and after a few steps;
	, whose gun cannot be seen but whose right hand is in his right jacket
	pocket, looks at and then simultaneously pull out
	handguns and shoot multiple times at each other. During the gunfight,
	grabs his abdomen where it is later found he has been shot; falls
	backwards down some steps, continuing to fire at suffers
	gunshots to his chest and right leg; suffers a gunshot wound to his flank area.
9.	During the exchange of gunfire between and
	WILLIAM DREDDEN and Tiffany HARRISON take cover by the wall and a nearby
	parked vehicle. After the shooting ends, WILLIAM DREDDEN and Tiffany HARRISON
	follow as he flees in the direction from which they had initially
	arrived.
10	. Private surveillance video from the 1800 block of Braddish Avenue showed the same silver
	2020 Ford Edge SUV pull into the 1800 block of Braddish Avenue shortly after the
	shooting was reported to police. WILLIAM DREDDEN, wearing the same red hoodie,
	khaki pants, and red tennis shoes, emerges from the driver's seat and opens the driver's
	side rear door; records indicate that he has called 911, reporting that his son has been shot.
	Tiffany HARRISON emerges from the front passenger seat, wearing the same light blue
	pants and a black and white plaid shirt; she crosses the street and enters her residence; she

re-emerges a few minutes later, wearing different clothing. WILLIAM DREDDEN

removes his red hoodie, which was later found in the vacant lot next to Tiffany

HARRISON's residence.

11. Tiffany HARRISON accompanies in the ambulance to Shock Trauma where was treated for his injuries.

SECOND COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present the aforesaid DEFENDANT(S), late of said City, heretofore on or about OCTOBER 27, 2023, in and around the 2200 block of Presstman Street in Baltimore City, and in the State of Maryland, did CONSPIRE with William Dredden and , and others known and unknown, to assault in the first degree in violation of the Criminal Article, Section 3-202 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

CR 3-202 1 1420

THIRD COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about <u>October 27</u>, <u>2023</u>, at <u>2200 Block of Presstman Street</u>, did assault in the second degree, in violation of Criminal Law Article, Section 3-203 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[CR 3-201; CR 3-203; CR 3-206] 1 1415

FOURTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about <u>October 27</u>, 2023, at 2200 Block of Presstman Street, unlawfully did conspire with <u>William Dredden and</u> to assault in the second degree, in violation of the Common Law and Criminal Law Article, Section 3-203 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[Common Law; CR 1-202; CR 1-203; CR 3-201; CR 3-203] 1C1415

FIFTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about <u>October 27</u>, <u>2023</u>, at <u>2200 Block of Presstman Street</u>, did use a firearm, to wit: <u>Unknown Handgun</u> in the commission of a crime of violence, as defined in Public Safety Article, Section 5-101, and any felony, in violation of Criminal Law Article, Section 4-204 of the Maryland Code; against the peace, government and dignity of the State.

[CR 4-201; CR 4-204; CR 4-205; PS 5-101] 1 5299

SIXTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about October 27, 2023, at 2200 Block of Presstman Street, did conspire with William Dredden and to use a firearm, to wit: Unknown Handgun in the commission of a crime of violence as defined in Public Safety Article, Section 5-101, and any felony, in violation of Criminal Law Article, Section 4-204 of the Maryland Code; against the peace, government and dignity of the State.

blank statute code 1C5299

SEVENTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about <u>October 27</u>, <u>2023</u>, at <u>2200 Block of Presstman Street</u>, did recklessly engage in conduct that created a substantial risk of death and serious physical injury to <u>General Public</u>, 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 3-201; CR 3-204(a) (1); CR 3-204; CR 3-206] 1 1425

EIGHTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about <u>October 27</u>, <u>2023</u>, at <u>2200 Block of Presstman Street</u>, did wear, carry and transport a handgun, to wit: <u>Unknown Handgun</u> on and about their person, in violation of Criminal Law Article, Section 4-203 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[CR 4-201; CR 4-203; CR 4-203(a) (1) (i)] 1 1785

NINTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about <u>October 27</u>, 2023, at 2200 Block of Presstman Street, did conspire with <u>William Dredden and</u> to wear, carry and transport a handgun, to wit: <u>Unknown Handgun</u> on and about their person, in violation of Criminal Law Article, Section 4-203 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

1C1785

TENTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about <u>October 27</u>, <u>2023</u>, at <u>2200 Block of Presstman Street</u>, did wear, carry and knowingly transport a handgun, to wit: <u>Unknown Handgun</u> in a vehicle traveling on a road and parking lot generally used by the public, a highway, waterway, and airway of the State, in violation of Criminal Law Article, Section 4-203 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[CR 4-201; CR 4-203(a) (1) (ii); CR 4-203(c); CR 4-205] 1 1783

ELEVENTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about October 27, 2023, at 2200 Block of Presstman Street, did conspire with William Dredden and to wear, carry and knowingly transport a handgun, to wit: Unknown Handgun in a vehicle traveling on a road and parking lot generally used by the public, a highway, waterway, and airway of the State, in violation of Criminal Law Article, Section 4-203 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

1C1783

TWELFTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about <u>October 27</u>, <u>2023</u>, at <u>2200 Block of Presstman Street</u>, did wear, carry, and knowingly transport a handgun, to wit: <u>Unknown Handgun</u> concealed and open, on and about the person within 100 yards of, and in, a park, church, school, public building, and other place of public assembly in violation of Baltimore City Code, Article 19, Section 59-5; against the peace, government and dignity of the State.

BCC, Art. 19.59 5 BCC 59 5a

THIRTEENTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about <u>October 27</u>, <u>2023</u>, at <u>2200 Block of Presstman Street</u>, did wear, carry, or knowingly transport a handgun, to wit: <u>Unknown Handgun</u>, in a vehicle traveling on a road within 100 yards of a park, church, school, public building, and other place of public assembly in violation of Baltimore City Code, Article 19, Section 59-5b 2; against the peace, government and dignity of the State.

BCC, Art. 19.59 5 BCC 59 5b2

FOURTEENTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about <u>October 27</u>, <u>2023</u>, at <u>2200 Block of Presstman Street</u>, did wear, carry, and knowingly transport a handgun, to wit: <u>Unknown Handgun</u> in connection with the commission of a crime against a person and property within 100 yards of, and in, a park, church, school, public building, and other place of public assembly in violation of Baltimore City Code, Article 19, Section 59-5; against the peace, government and dignity of the State.

BCC, Art. 19.59 5 BCC 59 5c

FIFTEENTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about <u>October 27</u>, <u>2023</u>, at <u>2200 Block of Presstman Street</u>, did unlawfully violate the Annotated Code of Maryland Criminal Law Article 1-301 as an accessory after the fact for a felony violation of Criminal Law Article 2-205, Attempted Murder in the First Degree, by transporting away from the scene of a crime committed by in order to evade immediate apprehension and other acts, known and unknown; against the peace, government and dignity of the State.

[CR 1-301 1 1480; CR 2-205 2 0910]

The State's Attorney for the City of Baltimore