



DISTRICT COURT OF MARYLAND FOR Baltimore City

Located at 1400 E. North Avenue, Baltimore, Maryland 21213



Case No. 5B02463627

STATE OF MARYLAND

VS.

ANDERSON, KEITH

COMPLAINANT:

Officer: DETECTIVE DENNIS BAILEY

Agency/Subagency: AD 5905

Officer ID: H677

4811 HARFORD RD
BALTIMORE, MD 21214

CC#: 3220607116

SID:

LID:

DL#: A536-465-488-047

Race: 1 Sex: M

Ht: 6' 0"

Wt: 190

Hair:

Eyes: BRN

DOB: 01/17/1979

Home phone:

Cellphone:

STATEMENT OF CHARGES

UPON THE FACTS CONTAINED IN THE APPLICATION OF Officer: DETECTIVE DENNIS BAILEY IT IS FORMALLY CHARGED THAT ANDERSON, KEITH at the dates, times and locations specified below:

NUM	CHG/CIT	STATUTE	PENALTY	DESCRIPTION OF THE CHARGE
001	1 0990	CR 2 201	0 L	MURDER - FIRST DEGREE On or About 06/22/2022 - 06/22/2022 at 7:35PM 1900 BELAIR RD BALTIMORE, MD 21213 did feloniously, willfully and with deliberately premeditated malice aforethought, kill and murder Mr. Markeece Jordan . Against the Peace, Government, and Dignity of the State.
002	1 1107	CR 2 204	40 Y	MURDER-SECOND DEGREE On or About 06/22/2022 - 06/22/2022 at 7:35PM 1900 BELAIR RD BALTIMORE, MD 21213 ... did feloniously and with malice aforethought, kill and murder Mr. Markeece Jordan . Against the Peace, Government, and Dignity of the State.
003	1 1420	CR 3 202	25 Y	ASSAULT-FIRST DEGREE On or About 06/22/2022 - 06/22/2022 at 7:35PM 1900 BELAIR RD BALTIMORE, MD 21213 did assault Mr. Markeece Jordan in the first degree in violation of CR 3-202, contrary to the form of the act of the assembly in such case made and provided and against the peace, government and dignity of the state. Against the Peace, Government, and Dignity of the State.
004	1 5299	CR 4 204 (b)	20 Y	FIREARM USE/FEL-VIOL CRIME On or About 06/22/2022 - 06/22/2022 at 7:35PM 1900 BELAIR RD BALTIMORE, MD 21213 ... did use a firearm in the commission of a felony/crime of violence. Against the Peace, Government, and Dignity of the State.
005	1 1415	CR 3 203	10 Y &/or \$2,500.00	ASSAULT-SEC DEGREE On or About 06/22/2022 - 06/22/2022 at 7:35PM 1900 BELAIR RD BALTIMORE, MD 21213 did assault Mr. Markeece Jordan in the second degree in violation of CR 3-203, contrary to the form of the act of the assembly in such case made and provided and against the peace, government, and dignity of the state. Against the Peace, Government, and Dignity of the State.
006	1 1425	CR 3 204 ((a)(1))	5 Y &/or \$5,000.00	RECKLESS ENDANGERMENT On or About 06/22/2022 - 06/22/2022 at 7:35PM 1900 BELAIR RD BALTIMORE, MD 21213 did recklessly engage in conduct, to wit: "Did shoot a gun intentionally aimed at Mr. Markeece Jordan " that created a substantial risk of death or serious physical injury to Mr. Markeece Jordan .

Date : 10/18/2022 Time : 7:34 PM

Tracking No. 221001645454

Judicial Officer:

1413

**DISTRICT COURT OF MARYLAND FOR Baltimore City**

Located at 1400 E. North Avenue, Baltimore, Maryland 21213

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STATE OF MARYLAND VS. ANDERSON, KEITH

007	1 1455	CR 4 203 ((a)(1)(v))	3 Y &/or \$2,500.00	Against the Peace, Government, and Dignity of the State. LOADED HANDGUN ON PERSON On or About 06/22/2022 - 06/22/2022 at 7:35PM 1900 BELAIR RD BALTIMORE, MD 21213 ... did wear/carry/transport a loaded handgun on or about their person. Against the Peace, Government, and Dignity of the State.
008	1 5212	CR 4 203	3 Y &/or \$2,500.00	HANDGUN ON PERSON On or About 06/22/2022 - 06/22/2022 at 7:35PM 1900 BELAIR RD BALTIMORE, MD 21213 ...did wear/carry/transport a handgun on or about their person. Against the Peace, Government, and Dignity of the State.
009		19 59 2 (a)	1 Y &/or \$1,000.00	DISCHARGING FIREARMS On or About 06/22/2022 - 06/22/2022 at 7:35PM 1900 BELAIR RD BALTIMORE, MD 21213 Did discharge a gun within the City limits Of Baltimore, MD. Against the Peace, Government, and Dignity of the State.

DISTRICT COURT OF MARYLAND FOR Baltimore City

(City/County)

LOCATED AT (COURT ADDRESS)

RELATED CASES:

1400 E North AveDC Case : **5B02463627**

COMPLAINANT

DEFENDANT

Detective Dennis Bailey

Printed Name

242 W. 29th Street

Address

Baltimore, MD 21211

City, State, Zip

AD 5905 H677

Agency, sub-agency, and I.D. #

410-396-2100

Telephone

(Officer Only)

Keith Anderson

Printed Name

4811 Harford Rd

Address

Baltimore, MD 21214

City, State, Zip

CC# 3-220607116

Telephone

DEFENDANT'S DESCRIPTION: Driver's License # A536-465-488-047Sex MRace BHt. 600Wt. 190

Hair _____

Eyes BrwnComplexion med

Other _____

DOB 1/17/79ID SID1678096

APPLICATION FOR STATEMENT OF CHARGES

Page 1 of 3

I, the undersigned, apply for statement of charges and a summons or warrant which may lead to the arrest of the above named defendant because on or about June 22nd 2022 at 1900 Belair Road Baltimore, Maryland 21213, the above named defendant

did shoot a gun intentionally aimed at Markeece Jordan (M/B/1-18-93) and kill him.

(Concise statement of facts showing that there is probable cause to believe that a crime has been committed and that the defendant has committed it):

(Continued on attached _____ pages) (DC-CR-001A)

I solemnly affirm under the penalties of perjury that the contents of this document are true to the best of my knowledge, information, and belief.

10-18-22
Date

Officer's Signature

Dennis Bailey
Printed Name

I have read or had read to me and I understand the notice on the back of this form.

Date

Applicant's Signature

Printed Name

Subscribed and sworn to before me this 18 day of OctTime: 7:07 ☐ AM ☒ PM

Judge/Commissioner

Month

2022
Year14113
ID Number

I understand that a charging document will be issued and that I must appear for trial ☐ on _____

at _____, ☒ when notified by the clerk, at the court location shown at the top of this form.

Applicant's Signature

☐ Applicant requests reasonable protection for safety of the alleged victim or the victim's family

(Describe)

☒ I have advised applicant of shielding right.

☐ Applicant declines shielding.

☐ I declined to issue a charging document because of lack of probable cause.

Date

Commissioner

ID Number

Printed Name

NOTICE TO APPLICANT FOR A CHARGING DOCUMENT

You are making an application for a charging document which may lead to the arrest and detention of the individual you are charging. If, as result of your application, a charging document is issued by the commissioner, it will not be possible for the commissioner to withdraw the document. The charge may only be disposed of by trial or by action of the State's Attorney.

You will be required to appear at the trial as a witness. Failure to appear on the date set by the court could result in your arrest for failure to obey a court order.

The application which you are filing is being filed under oath. Criminal Law Article § 9-503, of the Annotated Code of Maryland provides that any person who makes a false statement or report of a crime or causes such a false report or statement to be made to any official or agency of this State, knowing the same, or any material part thereof, to be false, and with intent that such official or agency investigate, consider or take action in connection with such statement or report, shall be subject to a fine of not more than \$500, or be imprisoned not more than six (6) months, or be both fined and imprisoned, in the discretion of the court.

It is essential that you furnish as much information as possible about the offense. To be sure that your information is adequate, your application should clearly state the following:

1. WHO?
Identify the accused, (the person you are complaining about), and identify yourself.
2. WHEN?
The time, day, month and year of the offense.
3. WHERE?
The exact address and street, the city, county and state where the offense happened. Also state whether the offense happened in a private home or in some public place.
4. WHAT?
State exactly what was done to you. For example: if property was taken, describe it and its value; or, if property was damaged or destroyed, indicate the original cost of the item or its replacement value. If you do not know the exact value, estimate it as accurately as possible.
5. WHY?
The facts you give must show the accused intended to commit a criminal act.
6. HOW?
How the accused committed the offense. For example, if you were physically assaulted, were you struck with a fist, a flat hand, kicked, or pushed, or were you struck with an object, such as a club or pipe, etc.? If property was taken, how did the accused get it? If it was destroyed or damaged, how did the accused cause the damage?
7. At the top of the application, you will notice a space marked "DESCRIPTION". The information in this space refers to the **accused**. It is important to furnish as much of this as possible so that the accused may be easily identified.

You are entitled to request that the address and telephone number of a victim, complainant or a witness be considered for shielding at the filing of this application.

If you need further assistance in completing your application, please feel free to ask the commissioner.

NOTICE: Remote access to the name, address, telephone number, date of birth, e-mail address, and place of employment of a victim or non-party witness is blocked. (Md. Rule 16-918)

**DISTRICT COURT OF MARYLAND FOR** Baltimore City

LOCATED AT (COURT ADDRESS)

100 N. Calvert Street
Baltimore, MD 21202

DC Case : 5B02463627



(City/County)

DEFENDANT'S NAME (LAST, FIRST, M.I.)

Anderson, Keith

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 3 of 3

On 6/22/22, at 1935 hours, I received a phone call from Dispatcher 87. This detective was advised of an unresponsive male shot at the location of a BP Gas Station on North Ave and Bel Air Road. Sgt Gause and Homicide Detectives Bailey, Saunders, and Veney responded to the scene arriving at 1955 hours. The victim was transported to Johns Hopkins Hospital prior to our arrival by Medic 20. The victim was pronounced deceased at 1948 hours by Dr. Owen. The victim was positively identified as Markeece Jordan (M/B/1-18-93). An autopsy was conducted the next day. The victim was found to be shot three times. His death was ruled a homicide.

In the course of the investigation witnesses and associates were identified and interviewed. Video surveillance cameras were located and the video evidence secured. The murder is captured on video. The video provides a precise timestamp of the murder as well as suspect clothing, mode of transportation, and direction of travel to and from the murder. *A handgun was used.*

Witnesses and associates interviewed by this detective informed me of a violent dispute between victim Markeece Jordan and a person named Keith Anderson (M/B/1-17-79). Their dispute was over the victim's alleged intimate relationship with a female known by both men. A text/chat message inside the victim's phone warned him to walk away and stay away from Keith.

This Detective obtained search warrants for Keith Anderson's cell phone, historic cell phone data, and his Instagram account. Photographs were obtained from the search warrants that demonstrate Mr. Anderson's familiarity with the location of the murder as well as photographs of Mr. Anderson wearing the same style mask and ball cap as the shooter in the video. Furthermore, the shooter arrives on foot and flees on foot demonstrating familiarity with the location.

Suspect/Keith Anderson (M/B/1-17-79) location at the time of the murder was plotted by using his historic cell phone data. Mr. Anderson was present at the time and location of the murder. Mr. Anderson historic cell phone data also follows the path of the suspect seen in video arriving and fleeing the scene. This detective knows the cell phone data used to track Keith Anderson in fact belongs to Keith Anderson because he is the listed subscriber to the number and the same phone was seized from his person.

The victim and suspect were not friends and did not have shared contacts of one another in their respective cell phones. One week before Markeece Jordan's murder, Keith Anderson downloaded a photograph of the victim to his phone that was taken from the victim's Instagram page. Only five hours after the victim's murder, Keith Anderson sent a message to the female which the victim had an alleged affair. He stated, "I guess you Really mad About your friend huh." Keith Anderson follows the same message by stating that "HE DON'T GIVE A FUCK" and that he "LIVED LONGER THAN HIM."

This detective is requesting an arrest warrant for first degree murder for Keith Anderson (M/B/1-17-79).

Date

10-18-22

Applicant's Signature

Printed Name

Dennis Bailey

Tr.#221001645454