



DISTRICT COURT OF MARYLAND FOR Baltimore City

Located at 700 E. Patapsco Ave., Baltimore, Maryland 21225



Case No. D-01-CR-25-010289

STATE OF MARYLAND

VS.

GRIMES, BRANDON

COMPLAINANT:

BEAUREGARD, JILL
BPD/ AD 5901 / 1984
242 W. 29TH STREET
BALTIMORE, MD 21211

NORTH BRANCH CORRECTIONAL INST
14100 MCMULLEN HIGHWAY SW
CUMBERLAND, MD 21502

CC#: 07-6A03963

SID:

FBI#:

LID:

DL#:

Race: B Sex: M

Ht: 5' 11"

Wt: 171

Hair: Eyes:

DOB: 04/18/1985

Home phone:

Cellphone:

STATEMENT OF CHARGES

UPON THE FACTS CONTAINED IN THE APPLICATION OF BEAUREGARD, JILL IT IS FORMALLY CHARGED THAT GRIMES, BRANDON at the dates, times and locations specified below:

NUM	CHG/CIT	STATUTE	PENALTY	DESCRIPTION OF THE CHARGE
001	1 1366	CR 8 301 ((c)(2)(i)(ii)) 20	Y &/or \$25,000.00	FRAUD IDENT INFO THFT \$100K+ On or About 02/01/2018 - 02/28/2018 100 N. CALVERT STREET BALTIMORE, MD ... did knowingly and willfully assume the identity of another to wit: SANDRA BOHLEN with fraudulent intent to obtain a benefit/obtain other item of value, to wit: RELEASE AND EXONERATION, having a value of \$100,000 or greater. Against the Peace, Government, and Dignity of the State.
002	1 1366	CR 8 301 ((c)(2)(i)(ii)) 20	Y &/or \$25,000.00	FRAUD IDENT INFO THFT \$100K+ On or About 02/01/2018 - 02/28/2018 100 N. CALVERT STREET BALTIMORE, MD ... did knowingly and willfully assume the identity of another to wit: CHRISTOPHER FABER with fraudulent intent to obtain a benefit/obtain other item of value, to wit: RELEASE AND EXONERATION, having a value of \$100,000 or greater. Against the Peace, Government, and Dignity of the State.
003	1A1134	CL	20 Y &/or \$25,000.00	ATT-THEFT: \$100,000 PLUS On or About 02/01/2018 - 02/28/2018 100 N. CALVERT STREET BALTIMORE, MD ...did attempt to steal \$1,462,896.00 of STATE OF MARYLAND having a value of \$100,000 or more, in violation of CR 7-104 of the Annotated Code of Maryland. Against the Peace, Government, and Dignity of the State.
004	2 5006	CR 9 306	5 Y &/or \$10,000.00	OBSTRUCT JUSTICE On or About 02/01/2018 - 02/28/2018 100 N. CALVERT STREET BALTIMORE, MD ...did, by corrupt means try to obstruct/try to impede the administration of justice in BALTIMORE CITY CIRCUIT COURT, STATE OF MARYLAND. Against the Peace, Government, and Dignity of the State.
005	1 1333	CR 9 307 ((b))	3 Y &/or \$5,000.00	FABRICATE PHYS EVID CRIM PROC On or About 02/01/2018 - 02/28/2018 100 N. CALVERT STREET BALTIMORE, MD ... did fabricate physical evidence to wit: BALLISTICS REPORT in order to impair the verity of the physical evidence with the intent to deceive and that the fabricated physical evidence be introduced in a pending/future official proceeding. Against the Peace, Government, and Dignity of the State.
006	1 1334	CR 9 307 ((c))	3 Y &/or \$5,000.00	INTRO PHYS EVID CRIM PROC On or About 02/01/2018 - 02/28/2018 100 N. CALVERT STREET

Date : 10/15/2025 Time : 6:25 PM

Tracking No. 251003467175

Judicial Officer: _____

1360



DISTRICT COURT OF MARYLAND FOR Baltimore City

Located at 700 E. Patapsco Ave., Baltimore, Maryland 21225

Case No. D-01-CR-25-010289

STATE OF MARYLAND VS. GRIMES, BRANDON

BALTIMORE, MD

...did introduce physical evidence in an official proceeding knowing that the evidence has been altered/fabricated with the intent to deceive in order to impair the verity of the physical evidence.

Against the Peace, Government, and Dignity of the State.



DISTRICT COURT OF MARYLAND FOR

(City/County)

LOCATED AT (COURT ADDRESS)
700 E Patapsco Avenue

RELATED CASES:

Baltimore, MD 21225



DC Case : D-01-CR-25-010289

COMPLAINANT

DEFENDANT

Det. Jill Beauregard

Printed Name
242 W. 29th Street

Address

Baltimore, MD 21211

410-396-2100

City, State, Zip

Telephone

BPD, I-984

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

(Officer Only)

Brandon Grimes

Printed Name
14100 McMullen Highway SW

Address

Cumberland, MD 21502

City, State, Zip

Telephone

CC# 07-6A03963

DEFENDANT'S DESCRIPTION: Driver's License # _____ Sex M Race B Ht 5'11" Wt 171
Hair _____ Eyes _____ Complexion _____ Other _____ DOB 4/18/85 ID 2477526

APPLICATION FOR STATEMENT OF CHARGES

Page 1 of 6

(Include a statement of facts within your personal knowledge (what you saw or heard, what someone said to you, etc.) showing that there is probable cause to believe that a crime has been committed and that the defendant has committed it. Please see the "NOTICE TO APPLICANT FOR A CHARGING DOCUMENT" for further information.)

NOTICE: DO NOT INCLUDE ANY IDENTIFYING INFORMATION OF A MINOR VICTIM WITHIN THIS FORM.

I, the undersigned, apply for a statement of charges and a summons or warrant which may lead to the arrest of the above-named defendant because on or about On/around February 2018 at 100 N. Calvert Street, Baltimore, MD 21202
Date Place

, the above-named defendant

began to devise a scheme to fraudulently secure his release from prison and defraud the State of Maryland of approximately

\$1,462,896 (approximately \$91,431 per diem for 16 years), more than \$100,000, by way of creating and submitting fraudulent

ballistics documents to the Circuit Court of Baltimore City.

(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.

10/15/2025

Date

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

10/15/2025

Date

Officer's Signature

Printed Name

Applicant's Signature

Subscribed and sworn to before me 10-15-2025 at 6:27

Date

Time

Printed Name

☐ AM ☒ PM

Judge/Commissioner

I.D. Number

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

Date

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

Time

Applicant's Signature

☐ The applicant requests reasonable protection for safety of the alleged victim or the victim's family:

(Describe)

☐ I have advised applicant of the right to request shielding. ☐ The applicant declines shielding. ☐ Minor Victim(s)

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

Date

Commissioner

I.D. Number

**DISTRICT COURT OF MARYLAND FOR** Baltimore City

(City/County)

LOCATED AT (COURT ADDRESS)

700 E Patapsco Avenue
Baltimore, MD 21225

DC Case : D-01-CR-25-010289

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

GRIMES, BRANDON

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 2 of 5

On or around March 1, 2024, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682, filed a petition for writ of actual innocence with the Clerk's Office of the Baltimore City Circuit Court. In his petition, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 alleged that, in February 2018, an ASA "turned over to Grimes various pieces of newly discovered evidence she found and amongst those documents was a ballistic report she claimed she found in some box somewhere..." and alleged that the Baltimore Police Department "suppressed ballistics report and labeled confidential which Grimes was also a victim shot by same weapon that killed Mr. Chelsey". To support these false claims, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 referred to and attached as "Exhibit 1A" a purported Bullet Report purporting to show that both he and the victim, BPD police officer Troy Chesley, were victims of the shooting that occurred on January 9, 2007. The Conviction Integrity Unit of the Baltimore State's Attorney's Office was served with a copy of this petition filed by Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 containing the purported Bullet Report ("Report").

Chief Lauren Lipscomb was alerted to the suspicious purported Bullet Report and initiated an internal review. At the conclusion of the internal review, on or around July 29, 2025, Chief Lipscomb forwarded the review results to the BPD Homicide Unit to request an investigation. I, Detective Jill Beauregard, was assigned to the matter. The SAO and BPD investigation would reveal the following.

The Report contained several apparent inconsistencies. Firearms Examiner Sandra Bohlen's name and signature appeared on the Report but investigation revealed she did not prepare nor sign the Report. Firearms Examiner Christopher Faber's name and signature appeared on the Report but investigation revealed that he did not prepare nor sign the Report. The property numbers do not match. The styling of the Report is inconsistent with an authentic bullet report form.

Further investigation would reveal that, on August 29, 2008, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 was convicted of first-degree murder and related charges for his killing of off duty BPD police officer Troy Chesley, an incident which occurred on January 9, 2007. Of relevance, evidence was produced at trial that Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 approached Chesley, produced a 9MM Sig Sauer handgun and attempted to rob Chesley. At some point, Grimes DOB 4/18/1985 SID 2477526/DOC354682 shot at Chesley. Chesley produced his own departmentally issued .40 caliber Glock and returned fire striking Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 in the calf. Chesley collapsed having been shot multiple times. Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 ran from the scene leaving a blood trail and dropping his gun along the way. Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 was driven by friends to St. Agnes Hospital whereupon he received treatment. 9MM and .40 shell casings were recovered. Chesley's .40 Glock was recovered. Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 9MM Sig Sauer was recovered. On December 31, 2008, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 was sentenced to life without parole with a consecutive 20 year sentence on HGCov.

Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 has filed numerous post-trial motions since his conviction seeking release. All were denied by the Court.

10/15/2025

Date

Applicant's Signature

Printed Name

Tr.# 251003467175



DISTRICT COURT OF MARYLAND FOR Baltimore City

(City/County)

LOCATED AT (COURT ADDRESS)

700 E Patapsco Avenue
Baltimore, MD 21225

DC Case: D-01-CR-25-010289



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

GRIMES, BRANDON

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 3 of 6

On or around February 5, 2018, and February 6, 2018, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 placed phone calls from the prison in which he made numerous statements about having received the State's response to his 2017 petition without mentioning receiving the Report he would later claim as being critical.

On or around February 27, 2018, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 placed a call to an unknown male. During the call, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 discussed GTTF, PO Anthony Fata and getting released making statements to the effect of, "this is not even an officer [Fata] in that batch of officers [GTTF]" "[Fata] alleged he was in a shoot out when he wasn't" "when the whole time [State/BPD] found out he shot himself" "man, I got 11 years in like what the fuck, man, day for day, man I paid the debt and some for this shit" "have me in here for some dumb shit" "[State/BPD] didn't even have nothing against me" "especially when I maintained my innocence and nobody said I committed the crime" "expert got up there [at trial] and said me and yo [PO Chesley] could have been shot by the same gun". The unknown male asked a question to the effect of "they got ballistics?" Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 responded to the effect of "Partial inconclusive ballistics". The unknown male made a statement to the effect of, "I would have been like, yeah, we both got shot by, yeah". Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 made a statement to the effect of, "expert said [at trial] yeah it is possible that both people could have been shot by the same gun".

By 2023, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 began discussing his scheme with a Crystal Colen Cotton DOB 10/8/1983 who he convinced that he is the victim of a miscarriage of justice.

On or about May 24, 2023, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 placed a call to Cotton in which he made statements to the effect of making a plan to get "exonerated" by using a separate handgun case [Grimes] was charged in that resulted in a 'stet'.

In a second jail call to Cotton the same day, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 made statements to the effect that he could use a piece of evidence involving the gun to exonerate him.

On or around July 11, 2023, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 placed a call to Cotton in which he made statements to the effect that Maryland Court of Appeals issued a decision about ballistics requiring a reopening of cases if "you got that issue". Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 went on to the effect of how in his case he would "be a prime candidate" for this "precedent situation".

On or around July 12, 2023, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 placed a call to Cotton in which he made statements to the effect of, "my fight is to get the fuck out of here".

On or around July 14, 2023, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 placed a call to Cotton. Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 talked about filing motions to get out and made statements to the effect of, "you got to keep throwing shit in front of them, you have to find structural or new evidence to really even have a chance" "I need the leverage".

10/15/2025

Date

Applicant's Signature

Printed Name

Tr.#251003467175

**DISTRICT COURT OF MARYLAND FOR** Baltimore City

(City/County)

LOCATED AT (COURT ADDRESS)

700 E Patapsco Avenue
Baltimore, MD 21225

DC Case : D-01-CR-25-010289



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

GRIMES, BRANDON

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 4 of 6

On or around July 15, 2023, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 placed several calls to Cotton. During these calls, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 made statements to the effect of, "if everything goes to plan can get my case new traction" "if would have gone to trial on self defense, would have went in [his] favor" instead he went with "[he] didn't do it at all" "don't even care about the truth, what's the best story". Cotton made statements to Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 to the effect of "watch, when you get outta there you gonna have to fight for that money". In another call, Cotton called an unknown male individual on 3-way with Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682. Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 made statements to the effect of "shit looking up man" "I just need to work out the minor kinks" "I'm about to creep out this bitch pretty soon, I just need a vehicle." "I need everything to go smooth just get the fuck out of here, these motherfuckers gonna kick some shit out". Grimes stressed that he needs the man's help and the unknown man repeatedly assured Grimes making statements to the effect of "I got you, I got you" repeatedly.

Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 made ongoing statements comparing his case to other cases resulting in exonerations and obtaining money from the State of Maryland.

On or around January 20, 2024, the month prior to filing his petition and Report, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 called an UNKNOWN person and was talking about Cotton making statements to the effect of "I'm almost at the point of getting exonerated because of [Cotton]" "[Cotton] is in another state and found out shit, she is in Indiana, I met [Cotton] on Facebook, [Cotton] played detective".

Later the same day, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 made a call to Cotton stating to the effect of, "it ain't all about me, it's about [Cotton] too." "When I get this exoneration money I'll make sure you don't work again".

Later the same day, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 called Cotton again and talked about the Report. Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 made statements to the effect of, "I have got to make sure I have everything together, talking about the exhibit dealing with the ballistics shit, that's the one I gotta make sure I got everything with that shit I got from you, talking about something labeled confidential, I don't know if I overlooked it, I got the rough copy, he did a rough typed copy that he did for me to proofread, I see one mistake, he said that the labeled confidential, it should say 'they' labeled confidential".

On or around January 21, 2024, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 called Cotton and made statements to the effect of "motherfuckers push me to a point" "how he takes his freedom seriously that shit worthy of stabbing a motherfucker" "I wouldn't feel bad" "I want it [Petition] as perfect as possible...I paid for perfection" "a lawyer trying to use their name to get their earnings versus us we're trying to use perfection to get the earnings".

On or about January 26, 2024, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 called Cotton and made statements to the effect that his "homeboy" "can do everything you need" "if you need a birth certificate changed, he can do that".

10/15/2025

Date

Applicant's Signature

Printed Name

Tr.#251003467175

**DISTRICT COURT OF MARYLAND FOR** Baltimore City

(City/County)

LOCATED AT (COURT ADDRESS)

700 E Patapsco Avenue

Baltimore, MD 21225



DC Case : D-01-CR-25-010289

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

GRIMES, BRANDON

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 5 of 6

After filing the petition and Report, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 talked with Cotton on or about February 29, 2024. Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682, made statements to the effect of "I fucked the angles up" "you probably need to just recopy it and cut it your way". Cotton responded to the effect of "I could glue that down then xerox it" "once I Xerox it I could white the edges out of it" "then do it one more time and then you won't be able to tell". Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 responded with statements to the effect of "I made that myself" "I'm an innovator". Cotton then responded with statements to the effect of "I can't talk about it without talking about it". Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 then responded with statements to the effect of "I know" "remember how before like trying do that arts and crafts that you did".

On or around September 7, 2025, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 was on the phone with Cotton talking about the pending petition and Report. Cotton said to the effect of "I think you should do the drug program [8505/8507 reference] shit, you tried damn near every avenue in the book". Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 responded to the effect of "I still gotta get the money though".

The proceeding on the petition and Report is still pending and ongoing. In filing the petition and Report, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 willfully and knowingly assumed the identities of both Sandra Bohlen and Christopher Faber with the fraudulent intent of securing a benefit – his release and exoneration – in hopes of securing \$100,000 or more – in per diem per year - from the State of Maryland in violation of Crim. Law Sec. 8-301(c).

By submitting and filing the fraudulent Report, Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 knowingly and willfully has taken, and continues to take, a substantial step to fraudulently obtain through deception money from the State of Maryland valued at more than \$100,000 in violation of Crim. Law Sec. 7-104(g).

By fabricating physical evidence, Brandon Grimes intends to deceive and intends that the Report be introduced in a pending or future official proceeding thereby obstructing justice in violation of Crim. Law Sec. 9-307(b) and (c). Brandon Grimes DOB 4/18/1985 SID 2477526/DOC354682 submitted and filed his writ of actual innocence petition and Report with the Baltimore City Circuit Court located in Baltimore City, State of Maryland.

Charges being sought:

1) Identity Fraud

Victim: Sandra Bohlen

Crim. Law Sec. 8-301(c)(2)(1)

Penalty: 20Y/\$25k, see Crim. Pro. 8-301(g)(1)(iii)

2) Identity Fraud

Victim: Christopher Faber

Crim. Law Sec. 8-301(c)(2)(1)

Penalty: 20Y/\$25k, see Crim. Pro. 8-301(g)(1)(iii)

10/15/2025

Date

Applicant's Signature

Printed Name

Tr.#251003467175



DISTRICT COURT OF MARYLAND FOR Baltimore City

(City/County)

LOCATED AT (COURT ADDRESS)

700 E Patapsco Avenue
Baltimore, MD 21225



DC Case : D-01-CR-25-010289

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

GRIMES, BRANDON

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 6 of 6

Charges Being Sought Continued:

3) Attempted Felony Theft over \$100,000

Victim: State of Maryland

Crim. Law Sec. 7-104(g)(1)(iii)

Penalty: 20Y/\$25k fine

4) Evidence Tampering -- Section b

Victim: N/A

Crim. Law Sec. 9-307(b)

Penalty: 3Y/\$5k

5) Evidence Tampering -- Section c

Victim: N/A

Crim. Law Sec. 9-307(c)

Penalty: 3Y/\$5k

D-01-CR-25-010289



10/15/2025

Date

Julie P. [Signature]
Applicant's Signature

Printed Name

Tr.#251003467175