

Before the
Attorney Grievance Commission of Maryland
Office of Bar Counsel
200 Harry S. Truman Parkway, Suite 300
Annapolis, Maryland 21401

In the Matter of)
)
Baltimore State's Attorney Marilyn Mosby)
and Others*)
)
Regarding the Investigation and Prosecution)
of Six (6) Baltimore Police Officers For the)
Death of Freddie Gray)

** Complainant respectfully reserves the right to file additional related complaints, and requests for investigation, concerning other attorneys involved in these same matters, and to file supplemental and/or additional complaints against Baltimore State's Attorney Marilyn Mosby.*

COMPLAINT AND REQUEST FOR PROMPT INVESTIGATION AND DISBARMENT

Complainant John F. Banzhaf III, an attorney and professor of law at the George Washington University, complains about and respectfully requests a prompt investigation of the conduct of Baltimore State's Attorney Marilyn Mosby regarding the investigation and prosecution of six (6) Baltimore police officers for the death of Freddie Gray.

Complainant respectfully suggests that Respondent appears:

- A. to have violated **RPC 3.8(a)** of the Maryland Lawyer's Rules of Professional Conduct [RPC] for attorneys which requires that a prosecutor refrain from prosecuting a charge unless it is supported by probable cause, and national standards which establish that a prosecution should proceed only if there is sufficient admissible evidence to support a conviction;
- B. to have violated **RPC 3.6(b)** and **RPC 3.8(e)** which limit the content of public statements which prosecutors may permissibly make in connection with criminal proceedings;
- C. to have violated **RPC 3.8(d)** by having improperly, illegally, and unconstitutionally withheld and otherwise failed to turn over to defense counsel exculpatory evidence;
- D. to, in further violation of **RPC 3.8(a)**, be continuing prosecutions against four of the officers although - especially in the light of detailed findings of fact in two rulings by Judge Barry Williams - there is no longer any basis to reasonably believe that the remaining charges are supported by probable cause, and/or that there is sufficient admissible evidence to support a conviction;
- E. to have engaged in conduct which, in its totality, and in light of the above, is inconsistent with the conduct required of attorneys, and especially of public prosecutors, under various ethical standards, including **RPC 8.4(c)** ["engage in conduct involving dishonesty, fraud, deceit or misrepresentation"] and **RPC 8.4(d)** ["engage in conduct that is prejudicial to the administration of justice"].

Complainant most respectfully suggests there are disturbing similarities to the situation involving Mike Nifong and his wrongfully continuing prosecution of the infamous Duke lacrosse rape cases.

PRELIMINARY NOTE: Because the complainant believes that the attached documents largely speak for themselves and provide clear evidence of attorney misconduct, the following is only a very brief outline provided for the benefit of the Attorney Grievance Commission of Maryland.

A. It Is Respectfully Suggested That Baltimore State's Attorney Marilyn Mosby Violated Rule 3.8(a) of the Maryland Lawyer's Rules of Professional Conduct [RPC] for Attorneys Which Requires That a Prosecutor Refrain from Prosecuting a Charge Unless it is Supported by Probable Cause, and National Standards Which Establish That a Prosecution Should Proceed Only if There is Sufficient Admissible Evidence to Support a Conviction

Maryland Lawyer's Rules of Professional Conduct provides, at **Section 3.8(a)** that "The prosecutor in a criminal case shall: (a) refrain from prosecuting a charge that the prosecutor knows is not supported by probable cause;"

[https://www.law.cornell.edu/ethics/md/code/MD_CODE.HTM#Rule_3.6]

In addition, the NVPAC admonishes:

"The prosecutor is held to a higher standard than other attorneys in our legal system due to the great responsibility that comes with the position. . . . The prosecutor's authority to **exercise discretion in charging decisions** is a key component of our criminal justice system. **RPC 3.8(a)** requires that the prosecutor refrain from prosecuting a charge **not supported by probable cause**, while national standards establish that a prosecution should only proceed on the basis of **sufficient admissible evidence to support a conviction.**" The Ethical Prosecutor [footnotes omitted, emphasis added] [http://nvpac.nv.gov/Resources/Topics/Ethical_Prosecutor/]

From the moment the charges against the six police officers were announced, many prominent attorneys, law professors, and others with no connections to the parties were quoted in a variety of newspaper articles to the effect that the charges were clearly unwarranted by the evidence; e.g., that they were not supported by probable cause, and without sufficient evidence to support a conviction.

It is respectfully suggested and requested that the Commission use its resources to capture those many comments, which are readily available through Internet searches, consider them as part of this complaint as though physically attached, and give them whatever weight and consideration they reasonably deserve, especially considering how consistent they are, and how strongly the opinions are expressed by so many different attorneys from such varied backgrounds.

While such statements cannot by themselves provide the basis for disciplinary action, they should at the very least have alerted the Commission, and put Respondent on notice, that there was very serious reason to doubt that the charges which were announced met the ethical standards noted above.

Judge Barry Williams's lengthy verdict, finding that Officer Edward Nero was not guilty of any of the charges he faced ["assault, misconduct in office by corruptly performing an unlawful act, reckless endangerment and misconduct in office by corruptly failing to do an act that is required by the duties of his office"], and the detailed findings of fact it included, demonstrate very clearly that they were not only not sufficient to establish proof beyond a reasonable doubt, but also were not even supported by probable cause. [**SEE APPENDIX I - THE NERO VERDICT AND FINDINGS**]

Even a cursory reading shows that the judge never states that the evidence was even close to that required to convict; that it was a “close call” or a difficult decision; that a slight change or new interpretation of fact or of a piece of evidence might have led to a different conclusion, etc.

Moreover, the use in the opinion of words and phrases such as “no information presented at this trial,” “[t]he court is not satisfied that the state has shown,” “[t]he state did not present any evidence,” etc., and the repeated use of the phrase “no evidence,” only emphasizes that most if not all the charges lacked probable cause. Furthermore, for the same reasons, the prosecutors did not meet the national standard that there must be sufficient admissible evidence to support a conviction.

These same points were made even more strongly when, despite this initial judicial rebuke, Officer Goodson was brought to trial. Once again, and often using the same strong language, the Judge examined the evidence offered by the prosecutors and found it sorely wanting, and clearly insufficient to sustain even one of the many charges which were brought: i.e., “the State has charged the defendant with murder, which includes second-degree depraved-heart murder; and involuntary manslaughter, grossly negligent act; assault; manslaughter by motor vehicle, grossly negligent driving; criminally negligent manslaughter; misconduct in office, by corruptly failing to do an act that is required by the duties of his office; and reckless endangerment.” **[SEE APPENDIX II - THE GOODSON VERDICT AND FINDINGS]**

These many findings are especially significant for several reasons. First, this case was tried after the prosecution had the benefit of the earlier findings of Judge Williams, pointing out the many ways in which their evidence did not support a conviction and, indeed, apparently failed even to establish probable cause. Thus they could adjust their strategy and tactics, present new and different evidence (if available) which had not been used in the Nero trial, raise additional legal arguments to strengthen their case, etc. The fact that they were unable to do so, despite having been put on notice by Judge William’s initial Nero decision that there may not be probable cause for at least some if not all of the charges, clearly demonstrates that they are completely unable to substantiate any of the charges.

The case against Officer Goodson is also especially important because it seemed to many quoted observers - and also upon an independent examination - to be the strongest case the prosecutors have against any of the officers. For example, it involves the most serious of all the charges (“depraved indifference”), and apparently the most charges: (1) second-degree depraved-heart murder; (2) involuntary manslaughter; (3) grossly negligent act; (4) assault; (5) manslaughter by motor vehicle; (6) grossly negligent driving; (7) criminally negligent manslaughter; (8) misconduct in office, by corruptly failing to do an act that is required by the duties of his office; and (9) reckless endangerment.

Thus their failure to present sufficient evidence to sustain even one of these many charges - and, in the opinion of Judge Williams, to even come close to doing so - shows that the prosecutors should have known that they lacked probable cause for many if not all of the charges, and that the evidence was insufficient to support a conviction on many if not all charges. And, if this is in fact their strongest case, it would follow that they likewise lack probable cause and sufficient evidence to sustain a conviction regarding the other still-to-be-tried (or retried) cases against other officers.

A third reason why the findings regarding Officer Goodson are especially important is that Goodson, as the driver of the van, was the central figure in this matter; the single person around which all of

the other defendants interacted. Thus, in a very real sense, any criminal liability of the other defendants would appear to be derivative from, and/or interconnected with, that of Goodson. In other words, if with regard to Goodson there is no probable cause for most if not all of the charges against him, and if there is insufficient evidence to sustain these charges against him, it would appear even more strongly that the same would apply with greater strength to the other remaining officers.

A final reason why the Goodson decision is so important is that it clearly established - in what would appear to now constitute the "law of the case" with regard to all officers - that several legal theories upon which the prosecutors were heavily relying for their cases against other officers were not valid. For example, the court firmly rejected the suggestion that the mere failure to use seat belts - even if it might constitute a violation of a new rule - would rise to the level of a crime and/or support convictions of crimes such as "misconduct in office."

Similarly, the court found no factual basis for the newly created legal argument that there had been a so-called "rough ride," nor for the older argument that a failure to call for or provide medical attention at many of the stops is sufficient to support any crime which occurred in the Freddie Gray situation. In other words, the court found that there was no probable cause to believe that a rough ride had occurred, or that the evidence regarding the ride was sufficient to sustain any charge. All of this is important not only with regard to ethical violations which have occurred so far, but also because it makes it more difficult if not impossible for Respondent to claim that she now has a reasonable belief that there still exists probable cause regarding the remaining charge against the other officers and/or that there is sufficient evidence to support any verdicts against them.

B. It Is Respectfully Suggested That Baltimore State's Attorney Marilyn Mosby Violated the Maryland Lawyer's RPC 3.6(b) and RPC 3.8(e) Which Limit Public Statements Which Prosecutors May Permissibly Make in Connection with Criminal Proceedings

RPC 3.6 - Trial Publicity - provides that "(a) A lawyer who is participating or has participated in the investigation or litigation of a matter shall not make an extrajudicial statement that the lawyer knows or reasonably should know will be disseminated by means of public communication and will have a substantial likelihood of materially prejudicing an adjudicative proceeding in the matter.

(b) Notwithstanding paragraph (a), a lawyer may state: [long list including offenses, public record information, scheduling, warnings, information about accused, etc.]

As shown in the transcript of her remarks [**APPENDIX III - MOSBY STATEMENT**], Respondent, in addition to a lengthy statement of what she called "The statement of probable cause," also said: "To the people of Baltimore and the **demonstrators across America: I heard your call for 'No justice, no peace.'** Your peace is sincerely needed as I work to deliver justice on behalf of this young man."

"To those that are angry, hurt or have their own experiences of injustice at the hands of police officers I urge you to channel that energy peacefully as we prosecute this case **I have heard your calls for 'No justice, no peace,'** however your peace is sincerely needed as I work to deliver justice on behalf of Freddie Gray. . . ."

“Last but certainly not least, to the youth of the city. **I will seek justice on your behalf.** This is a moment. **This is your moment.** Let’s insure we have peaceful and productive rallies that will develop structural and systemic changes for generations to come. You’re at the forefront of this cause and **as young people, our time is now.**” [emphasis added]

First, the statements above, made by Respondent, clearly go far beyond that permitted by Maryland Lawyer’s **RPC 3.6(b)** and **RPC 3.8(e)**. Thus they create a prima facie case of violation warranting appropriate discipline. At the very least, Respondent must be asked to clearly and precisely explain why, in her opinion, her statements do not constitute a violation, especially since they do not appear to fall within any established exception.

For example **RPC 3.8(c)**, which provides that “Notwithstanding paragraph (a), a lawyer may make a statement that a reasonable lawyer would believe is required to protect a client from the substantial undue prejudicial effect of recent publicity not initiated by the lawyer or the lawyer’s client. A statement made pursuant to this paragraph shall be limited to such information as is necessary to mitigate the recent adverse publicity” does not seem to be applicable here.

Second, to many her statement appears to establish that a major reason for issuing the charges was not necessarily because there was probable cause to do so, and/or that there was sufficient evidence to support convictions, but rather the prevent further mob violence.¹ While seeking to deter mob violence is a laudable goal, it should not be the major role of a prosecutor, and a prosecutor should never issue an indictment merely to satiate a mob’s desire for revenge.

Yet in saying “I heard your call for ‘No justice, no peace,’” and “as we prosecute this case I have heard your calls for ‘No justice, no peace,’” she - by repeating the very words and demands the mob made - is clearly signaling to them her hope that the indictments will bring the peace she desires, not only in Baltimore, but also perhaps elsewhere [“To . . . the demonstrators across America”].

Similarly, seeking for whatever reason to ingratiate herself to young people by bringing and announcing indictments - “Last but certainly not least, to the youth of the city. I will seek justice on your behalf. This is a moment. This is your moment. . . . You’re at the forefront of this cause and as young people, OUR time is now.” - constitutes a misuse of her role, and a perversion of her office, since she is supposed to serve all of the citizens, not simply the young riot-prone ones.

Finally, regardless of her intent, her statement was unnecessarily inflammatory by, in effect, saying that “justice” in the case requires conviction of the police officers, and aligning herself with the threat that with “no justice,” there will be “no peace.” By seemingly endorsing the concept that it is permissible for young people to create a situation of “no peace” [rioting] if they do not receive

¹ In the connection, Complainant again suggests and respectfully requests that the Commission collect, analyze, and consider as an integral part of this complaint, the statements by so many responsible individuals quoted in the newspapers in response to Mosby’s statement. These statement indicate a contemporary understanding of her purpose as she explained it. They also show that many share Complainant’s view that these statements violated ethical codes and are grossly inappropriate for a prosecutor to make in this context.

whatever they regard as justice, and then equating “justice” with convictions in specific situations, the prosecutor seems to sanction violence and even encourage mob action.

But this is exactly what is prohibited by the portion of **RPC 3.8** which mandates “refrain[ing] from making extrajudicial comments that have a substantial likelihood of heightening public condemnation of the accused.” If members of the public are led to believe that there can be “justice” only if there are convictions, and that a paucity of convictions will lead to a situation of “no peace,” it puts enormous pressure on jurors - and upon an individual judge in a bench trial - to make a finding of guilt even if not warranted by the evidence. It is likely to also lead at least some other government officials, spokesmen for influential organizations, and others to call out even more shrilly for convictions in the hope of avoiding more street violence for a city which has already seen too much.

C. It Is Respectfully Suggested That Baltimore State's Attorney Marilyn Mosby Has Violated RPC 3.8(d) by Having Improperly, Illegally, and Unconstitutionally Withheld and Otherwise Failed to Turn Over to Defense Counsel Exculpatory Evidence

RPC 3.8(d) provides that “The prosecutor in a criminal case shall: . . . (d) make timely disclosure to the defense of all evidence or information known to the prosecutor that tends to negate the guilt of the accused or mitigates the offense.”

Yet here it appears that the prosecutors, under the direction of Respondent, did not do that, as found by the trial judge. Below are excerpts from only one of many similar news reports:

ABC News - Judge Finds Prosecutors Withheld Evidence in Freddie Gray Officer Case [6/9/16]
[<http://abcnews.go.com/US/judge-finds-prosecutors-withheld-evidence-freddie-gray-officer/story?id=39725459>]

“**The judge** overseeing the trial of a police officer charged with murder in the death of Freddie Gray **has determined that** prosecutors withheld information that would have been beneficial to the defense. . . . **Williams found** today that prosecutors **committed a Brady violation** — after Brady v. Maryland, a 1963 Supreme Court decision requiring prosecutors to disclose evidence that would aid the defense — because Allen's May 2015 statement was deemed exculpatory evidence. . . . Williams has given Schatzow until Monday to turn over any other evidence the state might be withholding from the defense not only as it relates to this case but also in the next four trials.”

Since Complainant does not have ready access to the trial transcripts, he respectfully requests that the Commission - as part of its duty to investigate possible violations brought to its attention - obtain a copy of the relevant portion of the transcript and include it as part of this complaint. Furthermore, and for the same reason, Complainant respectfully suggests and requests that the Commission review the judge's determination in light of both the earlier [Nero] trial and the subsequent [Goodson] trial to determine if the violation applies to only one or to both trials, since the latter would make it an even more serious violation.

It must be noted that this withholding of relevant exculpatory evidence is not only a violation of ethical standards, but also a violation of the Constitution, since Judge Williams apparently found that “prosecutors committed a Brady violation.” Thus it is arguably much more serious.

Complainant respectfully suggests that Respondent is both legally and ethically responsible for this clear violation since this was a very high profile case in which she was very directly involved. Under such circumstances it is very highly probable that she was aware enough of the proceedings occurring in the courtroom to be aware of this violation. Thus, regardless of the extent of any role she may have played in deliberately deciding not to make this required disclosure, she is guilty of condoning and covering it up by her silence and inactions.

D. It Is Respectfully Suggested That Baltimore State's Attorney Marilyn Mosby is in Violation for Continuing Prosecutions Against Four of the Officers Although - Especially in the Light of Detailed Findings of Fact in Two Rulings by the Honorable Judge Barry Williams, and His Determinations of Law - There Is No Longer Any Basis to Reasonably Believe That the Remaining Charges Are Supported by Probable Cause and/or That There Is Sufficient Admissible Evidence to Support a Conviction

Even if it can somehow be argued that Respondent could have reasonably believed, as required by **RPC 3.8(a)**, and by national standards, that the prosecutions of Officers Nero and Goodson were warranted by probable cause, and supported by sufficient admissible evidence to support a conviction, it borders on the inconceivable that she or anyone else could possibly continue to maintain such a reasonable belief regarding the remaining four officers at this subsequent point in time.

Judge Williams carefully reviewed all of the evidence regarding these two, and concluded that none of it warranted a conviction of even one of the charges. Since this applies to Officer Goodson where it appears that the prosecutors had their strongest possible case, and who played such a central role in the entire incident that most of the findings would apply equally to the other officers who played a much more peripheral role, Respondent cannot reasonable believe that there remains sufficient evidence to warrant a conviction - especially in a trial before this same judge.

For example, this judge made it very clear that, because of conflicting expert medical testimony, it is impossible to determine just when the fatal injury occurred.² This would make it very difficult to determine even whether or not a crime such as homicide occurred, much less which individual officers' actions or inactions were, beyond a reasonable doubt, the cause in fact of the death.

He also found that there was no "rough ride" as the prosecutors had belatedly alleged, and that failing to belt in the prisoner was not under these circumstances a crime. These and other issues where the court has already made adverse findings appear to be common to many of the remaining defendants.

² "Based on all of this medical information, the Court is presented with a number of equally plausible scenarios." [at 14, **APPENDIX II**]

"The Court notes the dispute between the medical experts concerning degree of injury and whether symptoms would manifest themselves immediately or not. That is one of the key issues here. If the doctors are not clear as to what would be happening at this point in time, how would the average person or officer without medical training know?" [at 18, **APPENDIX II**]

Therefore, even if there once initially was probable cause, and likewise sufficient evidence to warrant a guilty verdict beyond a reasonable doubt, it has long since vanished. If Respondent under these unique circumstances continues the prosecutions, the flouting of the ethical rules, the manifest unfairness to the remaining officers, and the harm to the general public will become even clearer.

E. It is Respectfully Suggested That Baltimore State's Attorney Marilyn Mosby's Conduct is, Judged in its Totality, and in Light of All of the Above, Inconsistent with the Conduct Required of an Attorney, and Especially of Public Prosecutor, under Various Ethical Standards Including RPC 8.4(c) ["Engage in Conduct Involving Dishonesty, Fraud, Deceit or Misrepresentation"] and RPC 8.4(d) ["Engage in Conduct That Is Prejudicial to the Administration of Justice"]

Respondent respectfully suggests that, in addition to weighing her conduct against the specific individual rules noted above, the Commission weigh her conduct regarding these officers as a whole, under the many and various different ethical standards to which prosecutors are held.

While there may be a tendency to think that, as an elected official, the proper and appropriate remedies for a runaway prosecutor lie with the political system and not with the Commission, this would be to take a very narrow and much too restrictive view of the Commission's role and duties.

The importance of attorney discipline was seen recently in the situation involving former Durham County, NC, district attorney Mike Nifong and his role in the infamous Duke lacrosse rape cases. There, like here, a prosecutor both brought and continued criminal charges even after it became clearer and clearer than there was insufficient evidence to support any convictions. There, like here, there were also statements beyond those permitted by the rules, and also other ethical violations, including withholding evidence.

In the Nifong situation, the North Carolina State Bar Disciplinary Committee unanimously voted to disbar him, after receiving a complaint accusing him of making public statements that were "prejudicial to the administration of justice" [RPC 8.4(d)] and of engaging in "conduct involving dishonesty, fraud, deceit, or misrepresentation." [Rule 8.4(c)]

Finally, to avoid any possible misunderstanding, Complainant here advises the Commission that he does not know, represent, nor has ever had any communication with, any of the police officers involved, their attorneys or law firms, not with any governmental agency in Maryland and/or private organization which is believed to be involved or otherwise have any interest in these matters.

Respectfully submitted,

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PLEASE ALSO SEE SUBSEQUENT ADDENDUM

ADDENDUM RELATED TO NEWLY DISCOVERED RELEVANT INFORMATION

After this complaint had been finalized and prepared for filing, Complainant has become aware of new information which appears to provide further support for some of the allegations previously set forth, as well as provide more information regarding additional ethical violations which appear to require investigation by the Committee.

This complaint respectfully suggested that Respondent had violated, and is continuing to violate, **RPC 3.8(a)** of the Maryland Lawyer's Rules of Professional Conduct for attorneys which requires that a prosecutor refrain from prosecuting a charge unless it is supported by probable cause, and national standards which establish that a prosecution should proceed only if there is sufficient admissible evidence to support a conviction.

Complainant also respectfully suggested that, as had occurred in the situation involving former Durham County, NC, district attorney Mike Nifong and his role in the infamous Duke lacrosse rape cases, Respondent was in violation for making public statements that were "prejudicial to the administration of justice" [**RPC 8.4(d)**] and of engaging in "conduct involving dishonesty, fraud, deceit, or misrepresentation." [**Rule 8.4(c)**].

In a motion just filed in State of Maryland v. Alicia White, Circuit Court for the Baltimore City, Case No. 1151411036, and apparently in similar motions filed by other defendants, it is reportedly alleged that the institution of the prosecution was obtained by conduct involving dishonesty, fraud, deceit, or misrepresentation, and by a misleading public statement prejudicial to the administration of justice.

More specifically, an article by Baltimore TV station WBAL states: "The Baltimore City State's Attorney's Office had claimed [Baltimore City Sheriff's Major Sam] Cogen **led an independent investigation** for their office, but Cogen in his affidavit [for the institution of the prosecution] said he **only signed off** on the investigation completed by the state's attorney's office." [emphasis added]

In moving papers, counsel for White claimed that "these defects . . . rise to the level which would violate the Officers' right to due process secured by the United States Constitution as well as the Maryland Declaration of Rights."

In short, what is being called the "District Court Defect" apparently occurred when Cogen applied for the charges, representing - as the law requires - that he have personal knowledge to support the application, whereas in fact he had no such knowledge; an allegation which, if true, would amount to conduct involving dishonesty, fraud, deceit, or misrepresentation as to which Mosby was a party.

It also involved a public statement by Mosby herself to the effect that Cogen had conducted an independent investigation when in fact he allegedly had not - therefore the making of a public statements that was prejudicial to the administration of justice.

The motion also alleged another separate example of conduct involving dishonesty, fraud, deceit, or misrepresentation, although this time involving secret grand jury testimony, and therefore not a public statement.

More specifically, it is alleged that the lead detective in the case was given a script to present to the grand jury rather than present her own independent testimony, but that “the script has material misrepresentations of fact contained within it.”

If true, this would also appear to clearly constitute conduct involving dishonesty, fraud, deceit, or misrepresentation. Moreover, since it resulted in the arrest and incarceration of police officers, it may well, as counsel has suggested, rise to the level which would violate the officers’ right to due process secured by the United States Constitution as well as the Maryland Declaration of Rights.

Because Complainant has no further knowledge nor insight regarding these topics, he simply respectfully submits the following documents for the information and convenient of the Committee, not only in further support of allegations previously made, but also confident that the Committee in carrying out its legal mandate will perform such further investigation as is needed, since these certainly raise at least a prima facie case of violation of **RPC 8.4(d)** for making public statements that were prejudicial to the administration of justice and of **RPC 8.4(c)** for engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation.

The documents attached include a copy of the moving papers, a lengthy article from the Baltimore Sun, and a shorter article from the Baltimore TV station WBAL. Please consider them as a further part of this complaint, and as part of a request for investigation and for the imposition of appropriate sanctions.

Respectfully submitted,

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ATTACHMENTS

APPENDIX I - Judge’s Verdict Decision in Trial of Officer Nero

APPENDIX II - Judge’s Verdict Decision in Trial of Officer Goodson

APPENDIX III - Transcript of Prosecutor Mosby’s Remarks re Charges Against Officers

APPENDIX IV - Copy of Just-Filed Motion to Dismiss by Officer White

APPENDIX V - Text of Article by Baltimore TV station - Three Officers Cite "Defect" In Prosecution As Grounds For Dismissal

APPENDIX IV - Text of Article in Baltimore Sun - Police Detective Says Misleading Narrative Presented to Grand Jury in Freddie Gray Case, Records Show