



OFFICE OF THE STATE'S ATTORNEY FOR BALTIMORE CITY

March 6, 2026

The Honorable J. Sandy Bartlett, Esq., Chair
Maryland House of Delegates, Judiciary Committee
House Office Building
6 Bladen Street, Annapolis, Maryland 21401

Re: Support of HB1361 – Criminal Law – Controlled Dangerous Substances and Criminal Organizations

Dear Chairwoman Bartlett and Honorable House Judiciary Committee Members,

Our names are Megan Greene and David Wiseman, Assistant State's Attorneys in the Office of the State's Attorney for Baltimore City. ASA Greene serves as the Strikeforce Coordinator in the Major Investigations Unit, and ASA Wiseman serves as the Deputy Chief of the Felony Firearms and Drug Trafficking Division. We are writing to express our full support for HB1361, "Criminal Law – Controlled Dangerous Substances and Criminal Organizations." This proposed legislation is designed to more effectively hold accountable those who engage in criminal enterprises, as well as in criminal conspiracies to traffic illegal controlled dangerous substances (CDS), frequently using multiple locations in multiple political subdivisions throughout Maryland to distribute and store drugs, firearms, and proceeds from drug trafficking operations. Specifically, HB1361 codifies conspiracy to illegally distribute CDS, provides that CDS conspiracies have the same penalties as the underlying crimes, allows for consolidated prosecution of a CDS conspiracy and associated crimes (including firearms crimes) in any venue with a nexus to the conspiracy, and provides for the consolidated prosecution of underlying criminal acts committed on behalf of a criminal organization along with the prosecution of the enterprise itself.

For context, Drug Trafficking Organizations (DTOs) generally exist in a structure where members have varying roles, from sources of supply of bulk CDS (typically measured in kilograms) to street-level distributors selling individual pieces of CDS to buyers, ultimately preying on individuals in our communities suffering from addiction. For example, where a street-level narcotics distribution conspiracy is operating in a particular block or neighborhood of Baltimore City, the drug trafficking operation functions during set times of day, typically early morning to evening, but sometimes 24-hours, and multiple members of the conspiracy are on the street at once, working together to distribute to buyers and protect the DTO's assets (including proceeds, drugs, territory, and people). CDS buyers can purchase CDS in amounts that are for personal use, or larger amounts to be resold at marked-up prices in a different area. Typically, individual pieces of CDS bought and sold at the street level take the form of gelatin capsules containing a powder mixture including fentanyl (or heroin), plastic containers/vials containing crack cocaine, or sometimes pressed pills (often fentanyl pressed to appear like prescription oxycodone, or methamphetamine pressed to appear like Adderall or so-called party drugs). While the logistics of distribution can differ slightly, street-level drug shops in Baltimore City typically sell individual pieces of CDS for \$3-\$10 and DTOs operating in surrounding counties, Western Maryland, or the Eastern Shore areas sell individual pieces for \$10-\$20 or more.



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Effective CDS investigations target the drug trafficking organizations themselves, identifying individuals within each DTO and their particular roles in the organization. While each organization's drug trafficking operations typically involve keeping a supply of CDS nearby for ongoing sales, members and associates of the conspiracy often maintain other stash houses, residences, and storage units in distant locations in order to better conceal and protect the narcotics and proceeds from law enforcement and other rival organizations; DTOs use these outlying locations to store CDS, proceeds, and weapons, and to manufacture, process, and package CDS for street-level sale, and similarly, key members and associates of the DTO frequently reside outside of the area of the street-level drug shop. Accordingly, successful investigation of DTOs and enforcement of CDS laws frequently leads to seizures of evidence of the conspiracy, such as CDS, firearms, and CDS proceeds, in separate venues from where the street-level operation functions.

In an effort to address the public safety issues presented by these conspiracies spanning multiple venues, in instances where criminal charges for conspiracy to distribute CDS are most appropriate, HB1361 first codifies conspiracy to distribute controlled dangerous substances and provides that the penalty for conspiring to violate CDS laws is the same as violating the laws themselves. Additionally, HB1361 allows for the efficient and effective consolidation of charges resulting from CDS investigations. Where criminal organization charges are also appropriate, as the criminal organization statute already provides for any venue with a nexus to the operation of the enterprise, HB1361 includes expanded language affirming appropriate venue for the underlying crimes committed on behalf of the criminal organization as well. The primary benefits here are those of judicial economy and legal efficiency, allowing the State to consolidate charging and trial of conspirators from a criminal investigation into a single set of indictments, while safeguarding each criminal Defendant against Double Jeopardy issues arising from their participation in a criminal enterprise operating in multiple places.¹ A single jury would hear from the State as to a single Defendant's (or multiple codefendants') involvement in the drug conspiracy or criminal organization without the possibility of multiple trials in multiple venues featuring duplicative evidence, witnesses, and argument by counsel.

Since at least 2023, the Office of the State's Attorney for Baltimore City has partnered with police agencies and other State's Attorney's Offices in numerous investigations of drug trafficking organizations that originated in Baltimore City and resulted in significant seizures of large quantities of illegal CDS, firearms, ammunition, and sums of money, across multiple venues including the following:

- 1) Conspiracy to Distribute CDS arising from a street-level drug shop operating in the 1700 block of N. Carey Street. Members of the conspiracy were working together to distribute fentanyl

¹ Similar venue provisions exist in at other areas of the criminal law, including: (1) with respect to Human Trafficking (Maryland Code, Criminal Law Article, Section 3-1102 provides, "a person who [engages in sex trafficking] may be charged, tried, and sentenced in any county in or through which the person transported or attempted to transport the other"); and (2) with respect to participating in a criminal organization (Maryland Code, Criminal Law Article, Section 9-804 provides, "Notwithstanding any other provisions of law, in circumstances in which violations [...] are alleged to have been committed in more than one county, the respective State's Attorney of each county, or the Attorney General, may join the causes of action in a single complaint with the consent of each State's Attorney having jurisdiction over an offense sought to be joined.")



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- and cocaine in this area, with some members maintaining residences in Baltimore County and Howard County that were being used as stash locations for CDS, proceeds, and firearms.
- 2) Conspiracy to Distribute CDS based on a CDS trafficking conspiracy in the 2800 block of Edmondson Avenue. A member of the conspiracy also had a residence in Baltimore County where he was storing CDS and a firearm on behalf of the conspiracy.
 - 3) Conspiracy to Distribute CDS arising from a street-level drug shop operating on Calhoun Street in Baltimore City. Seven members of the conspiracy were indicted, with one of the members keeping CDS for the conspiracy in his Baltimore County residence. Charged with CDS Conspiracy in the City and the CDS in his residence in Baltimore County.
 - 4) Conspiracy to Distribute CDS involving two individuals working together to sell large volumes of CDS. The maintained four stash locations – one residence in Baltimore City, and one house and two self-storage units in Baltimore County. They would frequently move CDS from the Baltimore City residence to one of the Baltimore County stash locations and vice versa. Large quantities of CDS were recovered from all four locations.
 - 5) Conspiracy to Distribute CDS associated with a drug shop operating in the 1500 block of Shields Place, involved several members and associates of the organization residing, storing CDS, and holding large amounts of money (drug-trafficking proceeds) in multiple locations in Baltimore County. Members and associates of the DTO would move CDS from the Baltimore County locations to several Baltimore City stash locations and ultimately the drug shop. Individuals were charged with CDS Conspiracy in Baltimore City and individual CDS seizures in Baltimore County.
 - 6) Conspiracy to Distribute CDS associated with a DTO operating in Baltimore City, including stash locations for illegal CDS, firearms, and money, in Baltimore City and Baltimore County with a Defendant actively moving between said locations. Investigators made observations and seized significant amounts of CDS and firearms/ammunition from locations associated with an individual and the DTO in Baltimore City and Baltimore County.
 - 7) Conspiracy to Distribute CDS associated with a drug shop operating in the Southwest District of Baltimore City, with associated addresses, including residences and stash locations throughout Baltimore City and Baltimore County. Similar to others, the investigation involved several members and associates of the organization utilizing multiple vehicles and residing, storing large quantities of CDS (both bulk CDS not yet packaged, and CDS packaged for street-level distribution), and storing proceeds throughout locations in Baltimore City and Baltimore County, far from the DTO's active drug shop. Individuals were charged with CDS conspiracy and related drug charges in Baltimore City and are subject to charging for CDS charges and gun seizures in Baltimore County as well.

In each of these instances, the citizens of the State of Maryland would have been best served, from a public safety perspective and in terms of judicial economy and legal efficiency, had the law clearly and expressly provided for prosecution under a consolidated indictment in a single venue of each of the co-conspirators involved in the CDS conspiracy. Similarly, where indictments for a criminal organization would be appropriate, charging the underlying enumerated crimes as well within the single indictment would be of greatest benefit to the public interest.



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In conclusion, we respectfully urge the Judiciary Committee and Maryland House of Delegates to support HB1361 and advocate for its passage.

Respectfully submitted,

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Megan Greene, Assistant State's Attorney

A handwritten signature in blue ink, appearing to read "David Wiseman", written over a horizontal line.

David Wiseman, Assistant State's Attorney