

**IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND**

**STATE OF MARYLAND**

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**V.**

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**CASE NOS: 109210015  
109210016**

**SHEILA ANN DIXON**

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**STATE'S SENTENCING MEMORANDUM**

The recent pronouncements by Ms. Dixon to the press only reinforce the need for this Court to impose the agreed upon sentence. It seems Ms. Dixon's unrepentant position is that the people of Baltimore should be willing to tolerate *some* corruption from their political leaders. Such defiant arrogance by a political leader is simply unacceptable.

While it has been difficult for everyone, including the prosecution team, to swallow the fact that this defendant will receive a substantial, life-long pension from the people of Baltimore, the alternative to accepting the plea agreement was equally, or more, unattractive. Continued litigation would have cost the taxpayers substantial sums. Ms. Dixon would have been only a suspended mayor while lengthy appeals dragged through the court system, possibly for years. If, in the future, some appellate court reversed the jury finding, Ms. Dixon might have had to be re-instated as mayor, receiving not only her pension, but her position and back pay as well. And, if she later prevailed, the people of Baltimore may have had to pay for her stable of seven (7) lawyers – a bill that might well exceed a million dollars. This plea agreement and sentence forecloses those possibilities.

In recent articles, Ms. Dixon purportedly has confessed that “[s]he should have reported the gifts she received from Lipscomb, but said they didn’t amount to much.” (Ex. 1) If, as the press has reported, Ms. Dixon made this and other statements, it suggests that she has lost touch with reality, is in a state of total denial and/or is trying to re-write history. It matters not which, or all, may be correct.

Ms. Dixon had already succeeded in making Baltimore fodder for the late-night comedians. But, even after the jury finding, Ms. Dixon has insisted upon not only bringing further disgrace to herself, but to the City by outrageously exclaiming the gifts she received “didn’t amount to much.” Could the citizens of Baltimore have continued to accept a mayor who somehow has talked herself in to believing gift certificates for fur coats, lavish trips and expensive dinners “don’t amount to much”? That taking a few gift cards meant for the needy is no big deal? Such an arrogant attitude can only be described as shameful.

The incredible claim by Ms. Dixon’s lawyers that she was not required to report gifts from Mr. Lipscomb was little short of laughable. Although Ms. Dixon has finally admitted the obvious -- that she knew Ronald Lipscomb was doing business with Baltimore – she has continued to tarnish the Office of Mayor of Baltimore. While the people of Baltimore are owed a full, complete and truthful explanation from their former mayor, it is probably too much to expect. Even in the face of Mr. Lipscomb’s sworn grand jury testimony that he gave Ms. Dixon cash to help her pay for her extravagant shopping spree, Ms. Dixon denies anything of the sort happened. But, if Lipscomb did not give her the cash, what is the source of the almost \$9,800 in cash that was magically deposited into her account in 2004? (Ex. 2) And, at the same time, what was the source

for the additional \$4,000 in cash that Ms. Dixon gave to her driver, Howard Dixon, to launder through his account? Was it just a coincidence that the cash was deposited at the exact moment she needed to pay for her extravagant purchases, including those Jimmy Choo shoes? Was the \$13,800 the only cash she received or was there more? Most importantly, why was the then president of the City Council dealing in cash in the first place? And, the gift cards – what is Ms. Dixon’s explanation of how they were received? Did she receive gift cards from others? Why were two unused Safeway gift cards which had been purchased for the Bea Gaddy Day celebration found in the defendant’s purse along with the used Giant gift card purchased by Doracon for the needy families? (Ex. 3) This defendant needs to answer these, and many other, questions. The people of Baltimore are owed the truth -- finally.

Sadly, Ms. Dixon is seemingly unwilling, or unable, to deal with the truth. If the people of Baltimore aren’t going to get the truth from their disgraced Mayor, at least they are entitled to finality, stability, and the chance to move forward. Accordingly, it is absolutely essential that this Court sentence the defendant in accordance with the plea agreement. In doing so, this defendant will finally become yesterday’s news.

Respectfully submitted,

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Deputy State Prosecutor

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this \_\_\_\_\_ day of February, 2010 a copy of the foregoing:

**STATE'S SENTENCING MEMORADUM** was mailed, postage prepaid, and e-mailed to:

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Robert A. Rohrbaugh