

IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

RECEIVED

STATE OF MARYLAND

*

v.

*

SHEILA ANN DIXON

*

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2009 OCT 23 P 12: 58
Case No. 109210015
CRIMINAL DEPT.

NOTICE OF INTENT TO INTRODUCE SUMMARY EVIDENCE

NOW COMES THE STATE of Maryland, by and through counsel, and, pursuant to §5-1006 of the Maryland Rules of Evidence, notifies the defendant in the above-captioned case that the State intends to introduce the following “summary” evidence at trial and in support thereof says:

- 1) Voluminous records regarding the purchase, use, redemption and possession of numerous gift cards and merchandise from various retail establishments have been obtained by the state via subpoena.
- 2) These records cannot easily or conveniently be examined in court.
- 3) The State has prepared the following summary evidence which it intends to use at trial:
 - a. Analyst’s notebook of the purchases / redemptions of gift cards from Best Buy, Inc.;
 - b. Analyst’s notebook of the purchases / redemptions of gift cards from Circuit City, Inc.;
 - c. Analyst’s notebook of the purchases / redemptions of gift cards from Target, Inc.;

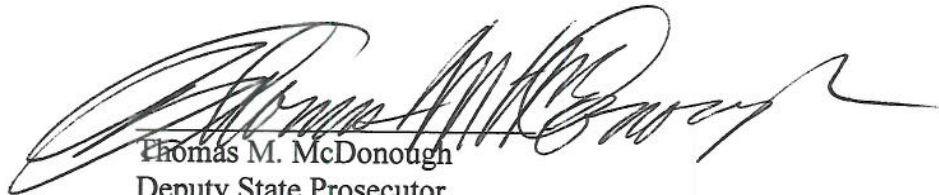
- d. Analyst's notebook of the purchases / redemptions of gift cards from Giant Foods, Inc.;
- e. Analyst's notebook of the purchases / redemptions of gift cards from The Gap, Inc. dba Old Navy;
- f. Analyst's notebook of the purchases / redemptions of gift cards from Toys R Us, Inc.;
- g. Analyst's notebook of telephone records from AT&T, AT&T Wireless, Verizon, Verizon Wireless, and Sprint;
- h. Analyst's notebook of records / receipts from Doracon Contractng, Inc.;
- i. Analyst's notebook of documents / records from the City of Baltimore;
- j. Analyst's notebook of some / all of the above combined.

All underlying evidence which supports these summaries are business records of Best Buy, Inc., Circuit City, Inc., Target, Inc., Giant Foods, Inc., The Gap, Inc., dba Old Navy, Inc., Toys R Us, Inc., AT&T, Doracon Contracting, Inc., and/or The City of Baltimore and has been provided to the defendant in disclosure/discovery. These summaries are provided with the express understanding that the State may elect not to introduce any or all of the summaries at the time of trial. These summaries will be provided by October 30, 2009.

Respectfully submitted,



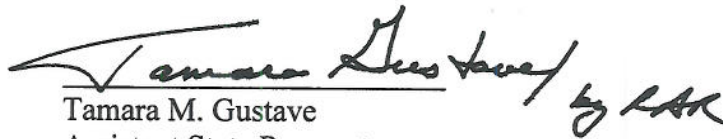
ROBERT A. ROHRBAUGH
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of October, 2009 a copy of the foregoing Notice of Intent to Introduce Summary Evidence was mailed, postage prepaid, to:

Dale P. Kelberman, Esq.
Miles and Stockbridge
10 Light Street
Baltimore, Maryland 21202

and

Arnold M. Weiner, Esq.
Barry L. Gogel, Esq.
Norman L. Smith, Esq.
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A handwritten signature in black ink, appearing to read "Arnold M. Weiner", is written in a cursive style.