

IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

STATE OF MARYLAND

*

v.

*

Case No. 109009009

SHEILA ANN DIXON

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STATE'S RESPONSE TO THE BILL OF PARTICULARS

Comes now the State of Maryland by and through the Office of the State Prosecutor and in response to the Bill of Particulars filed by the Defendant states as follows:

1. The identity of each "real estate and land development project" in which Ronald Lipscomb was involved in Baltimore City during the period 2003 to 2008. The identification may use the common name of the land development project as signified by how such project was referred to in City Council documents, Board of Estimates documents and/or the press:

- i. The Strathdale/Frankford project;
- ii. The Inner Harbor East project;
- iii. 2101 E. Biddle Street/ East Side Community Recreation Project;
- iv. The Railway Express project/1501 St. Paul Place;
- v. The Hollander Ridge Project;
- vi. The Orchard Ridge/Freedom Claremont Project;
- vii. The Uplands Project;
- viii. The Waterview Project;
- ix. The Baltimore Biotech Project;
- x. The Arizona Crossings Project;
- xi. The Baltimore Convention Center;
- xii. Nicks at the Baltimore Yacht Basin.

See also Ronald Lipscomb's Corporate Entities attached hereto as "Exhibit A" incorporated herein by reference.

2. The identity of each "corporation, limited liability company, limited partnership and joint venture" in which Ronald Lipscomb did business with the City, was regulated by the City or had a financial interest:

See Exhibit A. The red lines reflect entities in which Mr. Lipscomb is the 100% owner. For example, Mr. Lipscomb is the 100% owner of Doracon Development, LLC. Doracon Development, LLC is the 100% owner of RHL Development, LLC. RHL Development, LLC is the 100% owner of RHL Strathdale, LLC. RHL Strathdale, LLC owns a percentage of Frankford Neighborhood, LLC. (In this case, the percentage of Frankford Neighborhood has been, and is, 50%. The remaining 50% of Frankford Neighborhood, LLC is owned by another LLC which is controlled ultimately by the Streuver Brothers group.) Frankford Neighborhood, LLC is, and was, the entity responsible for the real estate development project commonly referred to as either Strathdale or Frankford. Originally, the Strathdale project was designated to be a joint venture between Doracon and Streuver Brothers. Pursuant to the Court's Order dated March 27, 2009, the State reserves the right to supplement this Response.

3. The identity of each "real estate and land development project" in which Patrick Turner was involved in Baltimore City during the period 2003 to 2008. The identification may use the common name of the land development project as signified by how such project was referred to in City Council documents, Board of Estimates documents and/or the press:

- i. Silo Point;
- ii. Westport Waterfront;
- iii. 1211 Light Street;
- iv. McHenry Theater;
- v. Henrietta Square;
- vi. Wall Street Garage;

vii. Aquarium Joint Venture.

4. The identity of each “corporation, limited liability company, limited partnership and joint venture” in which Patrick Turner did business with the City, was regulated by the City or had a financial interest:

- i. Turner Development, Inc.;
- ii. Henrietta Development Corporation;
- iii. Silo Point, LLC;
- iv. Silo Point II, LLC;
- v. Silo Point Holding, LLC;
- vi. Westport Development, LLC;
- vii. Inner Harbor West Development, LLC;
- viii. Inner Harbor West Corporation;
- ix. Inner Harbor West, LLC;
- x. Inner Harbor West, II, LLC;
- xi. Wall Street Garage Condominium, Inc.
- xii. McHenry Theater, LLC.

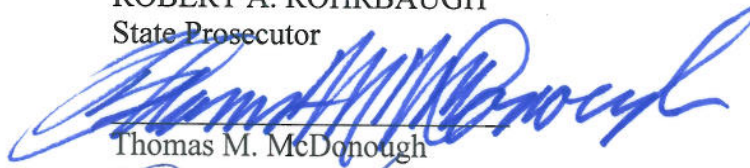
Pursuant to the Court’s Order dated March 27, 2009, the State reserves the right to supplement this Response.

5. With respect to Count Six of the Indictment which charges theft by deception in violation of Criminal Law Article 7-104, the dates or dates between December 18, 2006 and December 6, 2007 when the theft allegedly occurred:

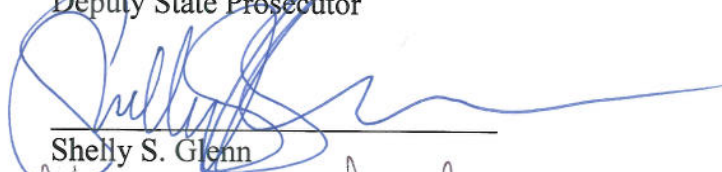
With respect to paragraph 120 of Count Six, the theft occurred on various dates which are set forth in paragraphs 73, 74, 75, 76, 77, 78, 79, 80 and 81. The identities of the Baltimore City employees and the relative of Ms. Dixon referred to in those paragraphs are known to the Defendant. However, if the Defendant wants the State to specify those persons in a Supplement to this Response, the State has no objection to doing so.

Respectfully submitted,

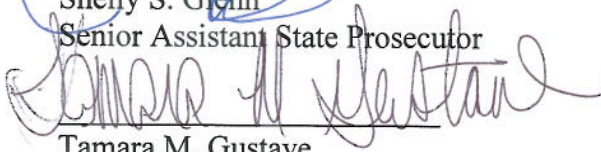
ROBERT A. ROHRBAUGH
State Prosecutor



Thomas M. McDonough
Deputy State Prosecutor



Shelly S. Glenn
Senior Assistant State Prosecutor



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8TH day of April, 2009 a copy of the foregoing

STATE'S RESPONSE TO THE BILL OF PARTICULARS was mailed, postage prepaid, to:

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

and

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RONALD LIPSCOMB

