

COPY

DISTRICT COURT OF MARYLAND FOR Wicomico County

JURY COMPLET

LOCATED AT (COURT ADDRESS)

201 Baptist St.

Salisbury, MD 21801-4971

DISTRICT COURT  
CASE NUMBER

RELATED CASES:

DEFENDANT'S NAME (LAST, FIRST, MI)

COMPLAINANT				DEFENDANT			
NAME (LAST, FIRST, MI)			TITLE	NAME (LAST, FIRST, MI)			TITLE
DET Kirkpatrick W280				Abreu, Steven Victor			
AGENCY	SUB-AGENCY	ID NO (POLICE)		MAFIS NAME (LAST, FIRST, MI)			TITLE
ZV	2201	W280					
WORK TELEPHONE		HOME TELEPHONE		ID NO	RACE	SEX	HT
410-548-4891					W	WT	DOB (MM/DD/YY)
ADDRESS		APT NO		CC/OCA		HAIR	EYES
401 Naylor Mill Rd						OTHER DESCRIPTION	
CITY		STATE		ZIP CODE		DRIVER'S LICENSE #	
Salisbury		MD		21801		MD 10273138110	
CITY		STATE		ZIP CODE		WORK TELEPHONE	
Salisbury		MD		21801		HOME TELEPHONE	
CITY		STATE		ZIP CODE		ADDRESS	
Salisbury		MD		21801		400 Nomreh Rd.	
CITY		STATE		ZIP CODE		CITY	
Salisbury		MD		21801		Salisbury	

- ☐ DOMESTIC VIOLENCE    ☐ HATE CRIME  
☐ VULNERABLE ADULT ABUSE    ☐ CHILD ABUSE

Page 1 of

3

## STATEMENT OF CHARGES

IT IS FORMALLY CHARGED THAT THE DEFENDANT

1

CJS CODE  
2 1103

AR

ON OR ABOUT (DATE)  
10/26/2022

AT (PLACE)

128 W. Dagsboro Rd., Salisbury MD 21801

....did unlawfully commit a rape in the second degree upon J A, in violation of CR 3-304 of the Annotated Code of Maryland, and against the peace, government, and dignity of the State..

IN VIOLATION OF

☒ MD ANN CODE ART CR SEC 3-304☐ COMMON LAW OF MD☐ PUB LOCAL LAW ART

SEC

PROBABLE CAUSE

☐ Y☐ N☐ COMAR OR AGENCY CODE NO☐ ORDINANCE NOAGAINST THE PEACE,  
GOVERNMENT AND  
DIGNITY OF THE STATE

COMMISSIONER INITIALS

ID NO

2

CJS CODE  
4 3600

AR

ON OR ABOUT (DATE)  
10/26/2022

AT (PLACE)

128 W. Dagsboro Rd., Salisbury MD 21801

....did engage in sexual contact with J A without her consent, and against the peace, government, and dignity of the State.

IN VIOLATION OF

☒ MD ANN CODE ART CR SEC 3-308(b)(1)☐ COMMON LAW OF MD☐ PUB LOCAL LAW ART

SEC

PROBABLE CAUSE

☐ Y☐ N☐ COMAR OR AGENCY CODE NO☐ ORDINANCE NOAGAINST THE PEACE,  
GOVERNMENT AND  
DIGNITY OF THE STATE

COMMISSIONER INITIALS

ID NO

☐ CONTINUED ON ATTACHED SHEET (FORM DC-CR-002A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF

DATE

10/30/2022

ISSUING PEACE OFFICER

DET Kirkpatrick W280

AGENCY

ZV

SUB-AGENCY

2201

ID NO

W280

TR#



## DISTRICT COURT OF MARYLAND FOR

Wicomico County

LOCATED AT (COURT ADDRESS)

201 Baptist St.

Salisbury, MD 21801-4971

DISTRICT COURT  
CASE NUMBER

JURY COURTS

DEFENDANT'S NAME (LAST, FIRST, MI)

Abreu, Steven Victor

MAYIS NAME

DOB

03/14/1992

## STATEMENT OF CHARGES (CONTINUED)

Page 2 of 3

HE IS FORMALLY CHARGED THAT THE DEFENDANT

3 CHS CODE 1-1415 AR ON OR ABOUT (DATE) 10/28/2022 AT (PLACE) Rt. 13 N/B and Foskey Ln., Delmar MD 21875

...did assault J A in the second degree in violation of CR 3-203, contrary to the form of the act of the assembly in such case made and provided and against the peace, government, and dignity of the state.

IN VIOLATION OF

3-203

☒ MD ANN CODE, ART. CT SEC☐ COMMON LAW OF MD☐ PUB LOCAL LAW, ART. SECPROBABLE CAUSE ☐ Y ☐ N☐ COMAR OR AGENCY CODE NO☐ ORDINANCE NOAGAINST THE PEACE,  
GOVERNMENT AND  
DIGNITY OF THE STATE

COMMISSIONER INITIALS ID NO

4 CHS CODE 1-0042 AR ON OR ABOUT (DATE) 10/26/2022 AT (PLACE) 128 W. Dagsboro Rd., Salisbury MD 21801

...did unlawfully and intentionally detain J A, in violation of the common law of this State and against the peace, government, and dignity of the State.

IN VIOLATION OF

☐ MD ANN CODE, ART. SEC☒ COMMON LAW OF MD☐ PUB LOCAL LAW, ART. SECPROBABLE CAUSE ☐ Y ☐ N☐ COMAR OR AGENCY CODE NO☐ ORDINANCE NOAGAINST THE PEACE,  
GOVERNMENT AND  
DIGNITY OF THE STATE

COMMISSIONER INITIALS ID NO

5 CHS CODE 1-1462 AR ON OR ABOUT (DATE) 10/26/2022 AT (PLACE) 128 W. Dagsboro Rd., Salisbury MD 21801

... did as a law enforcement officer, engage in sexual contact with J A, a person in the custody of the defendant and against the peace, government, and dignity of the State.

IN VIOLATION OF

3-314(e)

☒ MD ANN CODE, ART. CT SEC☐ COMMON LAW OF MD☐ PUB LOCAL LAW, ART. SECPROBABLE CAUSE ☐ Y ☐ N☐ COMAR OR AGENCY CODE NO☐ ORDINANCE NOAGAINST THE PEACE,  
GOVERNMENT AND  
DIGNITY OF THE STATE

COMMISSIONER INITIALS ID NO

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SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF

DATE ISSUING PEACE OFFICER

10/30/2022

DET Kirkpatrick W280

AGENCY

SUB-AGENCY

ID NO

ZV

2201

W280

TRACKING NUMBER



## DISTRICT COURT OF MARYLAND FOR

Wicomico County

LOCATED AT (COURT ADDRESS)

201 Baptist St.

Salisbury, MD 21801-4971

DISTRICT COURT  
CASE NUMBER

City County

DEFENDANT'S NAME (LAST FIRST MI)

Abreu, Steven Victor

MATTER NAME

DOB

03/14/1992

## STATEMENT OF CHARGES (CONTINUED)

Page 3 of 3

IT IS FORMALLY CHARGED THAT THE DEFENDANT

3	CJS CODE 2-0645	AR	ON OR ABOUT (DATE) 10/26/2022	AT (PLACE) 128 W. Dagsboro Rd., Salisbury MD 21801
...did, corruptly and in violation and perversion of his duties to uphold, enforce, and obey the laws of Wicomico County and the State of Maryland as a duly sworn Sheriff's Deputy of Wicomico County, commit misconduct in office by knowingly, willfully and intentionally assaulting J A under color of law and without a lawful purpose, in violation of the common law of this State and against the peace, government, and dignity of the State.				
IN VIOLATION OF				
<input type="checkbox"/> MD ANN CODE ART		SEC	<input checked="" type="checkbox"/> COMMON LAW OF MD	<input type="checkbox"/> PUB LOCAL LAW ART SEC
				PROBABLE CAUSE <input type="checkbox"/> Y <input type="checkbox"/> N
<input type="checkbox"/> COMAR OR AGENCY CODE NO			<input type="checkbox"/> ORDINANCE NO	AGAINST THE PEACE, GOVERNMENT AND DIGNITY OF THE STATE
				COMMISSIONER INITIALS _____ ID NO _____

4	CJS CODE 2-0645	AR	ON OR ABOUT (DATE) 10/28/2022	AT (PLACE) Rt. 13 N/B and Foskey Ln., Delmar MD 21875
...did, corruptly and in violation and perversion of his duties to uphold, enforce, and obey the laws of Wicomico County and the State of Maryland as a duly sworn Sheriff's Deputy of Wicomico County, commit misconduct in office by knowingly, willfully and intentionally detaining J A under color of law and without a lawful purpose, in violation of the common law of this State and against the peace, government, and dignity of the State.				
IN VIOLATION OF				
<input type="checkbox"/> MD ANN CODE ART		SEC	<input checked="" type="checkbox"/> COMMON LAW OF MD	<input type="checkbox"/> PUB LOCAL LAW ART SEC
				PROBABLE CAUSE <input type="checkbox"/> Y <input type="checkbox"/> N
<input type="checkbox"/> COMAR OR AGENCY CODE NO			<input type="checkbox"/> ORDINANCE NO	AGAINST THE PEACE, GOVERNMENT AND DIGNITY OF THE STATE
				COMMISSIONER INITIALS _____ ID NO _____

5	CJS CODE 2-0645	AR	ON OR ABOUT (DATE) 10/29/2022	AT (PLACE) 2750 N. Salisbury Blvd., Salisbury MD 21801
...did, corruptly and in violation and perversion of his duties to uphold, enforce, and obey the laws of Wicomico County and the State of Maryland as a duly sworn Sheriff's Deputy of Wicomico County, commit misconduct in office by knowingly, willfully and intentionally surveilling J A under color of law and without a lawful purpose, in violation of the common law of this State and against the peace, government, and dignity of the State.				
IN VIOLATION OF				
<input type="checkbox"/> MD ANN CODE ART		SEC	<input checked="" type="checkbox"/> COMMON LAW OF MD	<input type="checkbox"/> PUB LOCAL LAW ART SEC
				PROBABLE CAUSE <input type="checkbox"/> Y <input type="checkbox"/> N
<input type="checkbox"/> COMAR OR AGENCY CODE NO			<input type="checkbox"/> ORDINANCE NO	AGAINST THE PEACE, GOVERNMENT AND DIGNITY OF THE STATE
				COMMISSIONER INITIALS _____ ID NO _____

☐ CONTINUED ON ATTACHED SHEET (FORM DC-CR-002A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF

DATE ISSUING PLACER OFFICER

10/30/2022

DET Kirkpatrick W280

AGENCY

SUB-AGENCY

ID NO

ZV

2201

W280

TRACKING NUMBER

## NOTICE OF ADVICE OF RIGHT TO COUNSEL FOR ALL JUDICIAL PROCEEDINGS

### TO THE PERSON CHARGED:

1. This paper charges you with committing a crime.
2. If you have been arrested and remain in custody, you have the right to have a judicial officer decide whether you should be released from jail until your trial.
3. If you have been served with a citation or summons directing you to appear before a judicial officer for a preliminary inquiry at a date and time designated or within five days of service if no time is designated, a judicial officer will advise you of your rights, the charges against you, and penalties. The preliminary inquiry will be cancelled if a lawyer has entered an appearance to represent you.
4. You have the right to have a lawyer.
5. A lawyer can be helpful to you by:
  - (A) explaining the charges in this paper;
  - (B) telling you the possible penalties;
  - (C) helping you at trial;
  - (D) helping you protect your constitutional rights; and
  - (E) helping you to get a fair penalty if convicted.
6. Even if you plan to plead guilty, a lawyer can be helpful.
7. If you are eligible, the Public Defender or a court-appointed attorney will represent you at any initial appearance before a judicial officer and at any proceeding under Rule 4-216.1 to review an order of a District Court commissioner regarding pretrial release. If you want a lawyer for any further proceeding, including trial, but do not have the money to hire one, the Public Defender may provide a lawyer for you. The court clerk will tell you how to contact the Public Defender.
8. If you want a lawyer but you cannot get one and the Public Defender will not provide one for you, contact the court clerk as soon as possible.
9. **DO NOT WAIT UNTIL THE DATE OF YOUR TRIAL TO GET A LAWYER.** If you do not have a lawyer before the trial date, you may have to go to trial without one.

### RECEIPT

I have read or have had read to me the contents of the above notice and acknowledge receipt of a copy thereof.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Defendant

\_\_\_\_\_  
Date

\_\_\_\_\_  
Commissioner

\_\_\_\_\_  
ID No

### RETURN OF SERVICE

☒ I certify that at 0816 o'clock A M on October 31, 2022 at 401  
Naylor Mill Rd. Salisbury, MD 21801 . I executed this Statement of Charges by  
arresting the Defendant and delivered a copy of the Statement of Charges to the Defendant.

\_\_\_\_\_  
Detention Facility

\_\_\_\_\_  
Signature of Peace Officer

Detective  
Title

**DISTRICT COURT OF MARYLAND FOR** Wicomico County (City / County)

LOCATED AT (COURT ADDRESS)

201 Baptist Street  
Salisbury, MD 21801DISTRICT COURT  
CASE NUMBER

RELATED CASES:

**COMPLAINANT****DEFENDANT**

NAME (LAST, FIRST, MI) Det. Kirkpatrick			TITLE						
AGENCY ZV	SUB-AGENCY 2201	ID NO. (POLICE) W280	NAME (LAST, FIRST, MI) Abreu, Steven Victor			TITLE			
WORK TELEPHONE (410) 548-4891		HOME TELEPHONE N/A	ID NO	RACE H	SEX M	HI 511	WT 215	DOB (MM/DD/YY) 03/14/1992	
ADDRESS 401 Naylor Mill Road		APT. NO	CC/OCA 22-003302	HAIR BLK	EYES	OTHER DESCRIPTION			
CITY Salisbury	STATE MD	ZIP CODE 21801	DRIVER'S LICENSE # MD# 10273138110					STATE MD	
DOMESTIC VIOLENCE VULNERABLE ADULT ABUSE			HATE CRIME CHILD ABUSE			WORK TELEPHONE			HOME TELEPHONE
						ADDRESS 400 Nomreh Rd.			APT. NO
						CITY Salisbury			STATE MD
						ZIP CODE 21801			

Page 1 of 6**STATEMENT OF PROBABLE CAUSE**

ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

(THE DEFENDANT HAS BEEN ARRESTED FOR THE FOLLOWING INFORMATION OR OBSERVATION (MAKE APPROPRIATE CORRECTIONS AND DETAIL STATEMENT OF ESSENTIAL FACTS CONSTITUTING THE OFFENSE CHARGED))

On October 30, 2022, at approximately 1156 hours, I, Detective C. Kirkpatrick, was notified that the Road Patrol Supervisor was requesting a Detective to interview a female victim of a sexual assault. I was notified that the female began speaking to Sgt. H. Phillips, who thought she was there to file a complaint on a Deputy. Once the female victim, J.A. (3/1/95), began describing a sexual assault, Sgt. Phillips decided to stop talking to her and request the Criminal Investigation Division to assist.

Upon arrival I conducted a recorded interview with J.A., who was visibly upset and shaking as she spoke. J.A. described being in the parking lot of the Kohl's Department Store, meeting a friend, when a marked, Sheriff's Office, vehicle pulled up behind her vehicle and a Deputy exited, in full uniform, and initiated contact with her and her friend. She said that this occurred on October 26, 2022, at approximately 0100 hours to 0130 hours. She stated that the Deputy told them they were not allowed to be there when the business was not open.

☒ CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

PROBABLE CAUSE CHARGES # \_\_\_\_\_

LACK OF PROBABLE CAUSE CHARGES # \_\_\_\_\_

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF		
DATE Oct/30/2022	ARRESTING OFFICER C. Kirkpatrick	
AGENCY ZV	SUB-AGENCY 2201	ID NO W280

I HAVE REVIEWED THE STATEMENT OF CHARGES AND HAVE DETERMINED THAT THERE IS PROBABLE CAUSE TO DETAIN THE DEFENDANT		
THERE IS NOT PROBABLE CAUSE TO DETAIN THE DEFENDANT AND I HAVE ACCORDINGLY RELEASED HIM ON HIS OWN RECOGNIZANCE		
DATE	JUDICIAL OFFICER	COMMISSIONER ID NO

TRACKING NUMBER

PC DC/CR 4 (Rev. 4/2002)

PAGE 1 OF 4



DISTRICT COURT OF MARYLAND FOR Wicomico County (City / County)

LOCATED AT (COURT ADDRESS)

201 Baptist Street  
Salisbury, MD 21801

DISTRICT COURT  
CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST, MI)

Abreu, Steven Victor

MAFIS NAME

Page 2 of 6

**STATEMENT OF PROBABLE CAUSE (CONTINUED)**

ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

J.A. stated that the Deputy had a brief conversation with her friend and released him. She stated that the Deputy then came over to her vehicle and began speaking with her. She stated that the Deputy identified himself, by name, as Steven Abreu. She stated that he asked for her identification and asked her what her phone number was. She provided the information he requested and he wrote her information in a notebook that she saw him take out of his uniform vest pocket. She stated that he instructed her to get out of her vehicle, stating he wanted to check for illegal substances. She complied and described that he did not search her vehicle but proceeded to "frisk" her. She stated that he used his hands to grab her breasts and then grabbed her buttocks. She stated that he then told her to get back into her vehicle, which she did. She said that he then leaned into the open driver's side window, keeping his flashlight on and in his right hand. She said he then moved his left hand under her pants and penetrated her vagina with his fingers. She stated that he then began touching her breasts, under her clothing, with his left hand.

J.A. stated that she did not consent to any of the sexual acts. She stated that she did not feel free to leave and was fearful of what would happen if she did try to run away or fight him. J.A. said that her friend called her to check on her and she told Abreu it was her babysitter, and that she had kids at home waiting for her and she was late, hoping he would end the assault and let her leave. She stated that he wrote his phone number on a piece of paper and gave it to her before he let her go.

J.A. stated that Abreu called her phone and sent her several text messages from the number that he had

☒ CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF

DATE

Oct/30/2022

ARRESTING OFFICER

C. Kirkpatrick

AGENCY

ZV

SUB-AGENCY

2201

ID NO

W280

TRACKING NUMBER

PC DC/CR 4A (Rev. 4/02)

PAGE 2 OF 4

**DISTRICT COURT OF MARYLAND FOR** Wicomico County (City / County)

LOCATED AT (COURT ADDRESS)

201 Baptist Street  
Salisbury, MD 21801DISTRICT COURT  
CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST, MI)

Abreu, Steven Victor

MAFIS NAME

Page 3 of 6**STATEMENT OF PROBABLE CAUSE (CONTINUED)**

ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

written on the paper for her. She stated that she did not answer his phone call and did not respond to his text messages. She stated that she deleted the text message before opening it, but did see what it said. She said the message said something of a sexual nature. She said that she then blocked his number.

J.A. stated that the following Friday, October 28, 2022, at approximately 2252 hours, she was traveling home from her place of employment and noticed a marked, Sheriff's Office vehicle, behind her on the road. She stated that she was speaking to her fiancé, utilizing the hands-free system in her vehicle, and told him that she knew it was the same Deputy and that he was following her. She said that he turned on his emergency lights and she pulled over at Route 13 NB and Foskey Lane, Delmar, MD 21875. She stated that he initially approached on the passenger side of the vehicle and checked the car with his flashlight as he approached. She stated that he then acted like he didn't know it was her prior to stopping her. She said he told her that he had stopped her for having a tag light out. She said that he went back toward his car and was gone for several seconds. She stated that she thought he was checking her lights. She said that he then came back to the driver side of the car and spoke to her there.

She said that she told him she only had a few minutes to get to the store to get diapers for her child, before the store closed. She said he asked her why she didn't go to a different store, closer to her job, before heading in the direction of her home, indicating he had been watching her prior to her leaving from work and knew where she had gone.

☒ CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF

DATE

Oct/30/2022

ARRESTING OFFICER

C. Kirkpatrick

AGENCY

ZV

SUB-AGENCY

2201

I.D. NO.

W280

TRACKING NUMBER

PC DC/CR 4A (Rev. 4/02)

PAGE 3 OF 4

**DISTRICT COURT OF MARYLAND FOR** Wicomico County (City / County)

LOCATED AT (COURT ADDRESS)

201 Baptist Street  
Salisbury, MD 21801DISTRICT COURT  
CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST, MI.)

Abreu, Steven Victor

MAFIS NAME

Page 4 of 6**STATEMENT OF PROBABLE CAUSE (CONTINUED)**

ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

She stated that he reached in to the vehicle and grabbed her face, in the area of her jawline, with his hand. She stated that he forcefully moved her face and looked at her neck. She said he commented on marks, that he had seen on her neck during the first assault, no longer being visible. She said that he then let her go and told her that he would see her again and that she was not to tell anyone about their interactions.

J.A. said that the next day, Saturday, October 29, 2022, she was so fearful of Abreu returning to her place of employment that her fiancé drove her to work and dropped her off. She said that her fiancé then arrived to pick her up at approximately 2213 hours. Upon his arrival to the parking lot at 2750 N. Salisbury Blvd., Salisbury, MD 21801, he observed a marked, Sheriff's Office, patrol vehicle in the parking lot with the headlights on. He videoed his vehicle, showing all of it's lights operational, and included the patrol vehicle in the video. He then observed the vehicle leave and go to an adjacent gas station and park next to a gas pump. J.A. left work, and went home and had no further interaction with Abreu that day.

At approximately 1637 hours on Sunday, October 30, 2022 I, Detective C. Kirkpatrick, conducted a recorded interview with Steven Abreu at the Wicomico County Sheriff's Office. Abreu was advised of his Constitutional Rights and agreed to speak with me. In the first part of the interview Abreu made numerous statements that I knew to be untrue.

☒ CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF

DATE

Oct/30/2022

ARRESTING OFFICER

C. Kirkpatrick

AGENCY

ZV

SUB-AGENCY

2201

I.D. NO.

W280

TRACKING NUMBER

PC DC/CR 4A (Rev. 4/02)

PAGE 4 OF 4



DISTRICT COURT OF MARYLAND FOR Wicomico County (City / County)

LOCATED AT (COURT ADDRESS)

201 Baptist Street  
Salisbury, MD 21801DISTRICT COURT  
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DEFENDANT'S NAME (LAST, FIRST, MI)

Abreu, Steven Victor

MAFIS NAME

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## STATEMENT OF PROBABLE CAUSE (CONTINUED)

ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

These falsities include the following: stating that he recognized J.A.'s friend from a distance, because he was also a friend of his, and that was his reason for approaching them; that J.A. and her friend were released from the encounter at the same time and left together; that no portion of his interaction on the traffic stop was conducted with his camera systems turned off; and he denied having any contact with her in any way since the traffic stop.

The friend had been interviewed and stated that he did not know Abreu from any part of his life and that the detention in the Kohl's parking lot was the first time he could remember ever seeing him. He also stated that he was released from the stop and left prior to J.A. being released.

During the recorded interview with J.A. a single-party consent call was conducted and recorded. In that call Abreu spoke to J.A. about the incident and apologized 3 separate times. Abreu also admitted that he had turned off the camera systems in his car and his body-worn camera after the initial approach and prior to engaging in the conversation at the driver side door of J.A.'s vehicle.

☒ CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

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Oct/30/2022

ARRESTING OFFICER

C. Kirkpatrick

AGENCY

ZV

SUB-AGENCY

2201

ID NO

W280

TRACKING NUMBER

PC DC/CR 4A (Rev. 4/02)

PAGE 2 OF 4

DISTRICT COURT OF MARYLAND FOR Wicomico County (City / County)

LOCATION / AT (COURT ADDRESS)

201 Baptist Street  
Salisbury, MD 21801DISTRICT COURT  
CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST, MI)

Abreu, Steven Victor

MAFIS NAME

Page 6 of 6

## STATEMENT OF PROBABLE CAUSE (CONTINUED)

ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

At the end of the interview, Abreu admitted to vaginally penetrating J.A. with his fingers, touching her breasts under her clothing, and grabbing her breasts and buttocks while she was standing outside her vehicle. He stated that this all happened in the Kohl's parking lot, during the first encounter he had with her. Abreu maintained that the sexual contact was consensual.

ALL ABOVE EVENTS OCCURRED IN WICOMICO COUNTY, MARYLAND.

☐ CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF

DATE

Oct/30/2022

ARRESTING OFFICER

C. Kirkpatrick

AGENCY

ZV

SUB-AGENCY

2201

ID NO

W280

TRACKING NUMBER

PC DC/CR 4A (Rev. 4/02)

PAGE 3 OF 4

## NOTICE OF ADVICE OF RIGHT TO COUNSEL FOR ALL JUDICIAL PROCEEDINGS

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3. If you have been served with a citation or summons directing you to appear before a judicial officer for a preliminary inquiry at a date and time designated or within five days of service if no time is designated, a judicial officer will advise you of your rights, the charges against you, and penalties. The preliminary inquiry will be cancelled if a lawyer has entered an appearance to represent you.
4. You have the right to have a lawyer.
5. A lawyer can be helpful to you by:
  - (A) explaining the charges in this paper;
  - (B) telling you the possible penalties;
  - (C) helping you at trial;
  - (D) helping you protect your constitutional rights; and
  - (E) helping you to get a fair penalty if convicted.
6. Even if you plan to plead guilty, a lawyer can be helpful.
7. If you are eligible, the Public Defender or a court-appointed attorney will represent you at any initial appearance before a judicial officer and at any proceeding under Rule 4-216.1 to review an order of a District Court commissioner regarding pretrial release. If you want a lawyer for any further proceeding, including trial, but do not have the money to hire one, the Public Defender may provide a lawyer for you. The court clerk will tell you how to contact the Public Defender.
8. If you want a lawyer but you cannot get one and the Public Defender will not provide one for you, contact the court clerk as soon as possible.
9. **DO NOT WAIT UNTIL THE DATE OF YOUR TRIAL TO GET A LAWYER.** If you do not have a lawyer before the trial date, you may have to go to trial without one.

### RECEIPT

I have read or have had read to me the contents of the above notice and acknowledge receipt of a copy thereof.

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Date

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Signature of Defendant

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Date

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Commissioner

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ID No.