

Bryan Anthony Adams # 429-796 - 2844896  
13800 McMiller Hwy,  
Cumberland, MD 21502

Case # 124074

To-Whom it may concern;

I got arrested on Oct. 15, 2013 for Armed Carjacking, Armed Robbery and Use of a Handgun in a violent crime. I was found guilty on May 15<sup>th</sup>, 2014 and was sentenced on July 22, 2014 and I received 30yrs on a sentence of 30yrs. According to my lawyer and transcripts, I was strongly convicted of Count #3 (Armed Robbery) on Accomplice liability. I was never picked out of a line-up nor do I have a Co-Defendant. At trial the only victim said; He didn't know me, never seen me and he was sure I wasn't his guy. He also stated that the only suspect that could've been me was light-skinned and I don't match that description. My lawyer asked for an acquittal and was denied. The Fingerprint Expert said; he found no DNA of mine but found two (2) partial prints that he placed in the computer system that he couldn't get a match for but, got a list of 10 possible people (HITS) of who it could be. Violating my due

due process by showing a reckless disregard for the truth. He bypassed the other nine (9) possible suspects giving an incomplete analysis because he was confident as stated in transcripts shown. The elements of the case don't add up. From the very beginning the descriptions don't match, experts not following protocol and officers not interested in finding the truth of the matter showing a reckless disregard for the truth.

I highly appreciate your time and look forward to your help  
Thank you

Byron De  
13800 Mcmullen Hwy  
Cumberland, MI 48122

**MONTGOMERY COUNTY DEPARTMENT OF POLICE**

**LATENT EXAMINATION REPORT**

TO: ROBBERY SECTION  
FROM: F.S.S., R.A.F.I.S. - LATENT SECTION  
CR#: 13-037018  
LOCATION: 19116 STALEYBRIDGE RD. DATE: 8-7-2013 Class: 0348  
SUBJECT EXAMINED: ADAMS, BRYAN ANTHONY ID#: 1022447  
RACE: B SEX: M DOB: 11-22-1986  
FINGER: INKED PRINTS TAKEN BY: ISER DATE: 9-21-2005  
PALM: INKED PRINTS TAKEN BY: \_\_\_\_\_ DATE: \_\_\_\_\_  
LATENTS SUBMITTED BY: KRAEMER #15637/KARSCHNER #19227 DATE: 8-8-2013  
LATENTS SUBMITTED BY: \_\_\_\_\_ DATE: \_\_\_\_\_

**BASIS FOR EXAMINATION:**

- ( ) A MANUAL EXAMINATION WAS REQUESTED BY:
- (XXX) AN IDENTIFICATION RESULTED FROM AN AUTOMATED SEARCH OF OUR FILES.
- ( ) AN IDENTIFICATION RESULTED FROM AN AUTOMATED SEARCH OF THE STATE POLICE FILES.(cjis)
- ( ) AN IDENTIFICATION RESULTED BY SEARCHING THE LATENTS OBTAINED FROM THE OFFENSE FOR WHICH THE SUSPECT WAS ARRESTED.
- ( ) AN IDENTIFICATION RESULTED FROM A MANUAL SEARCH OF OUR FILES.

RESULTS: Four latent prints, lifted from "Steering Wheel", have been identified as the known prints of Bryan Anthony Adams, MO CO ID# 1022447. Thirteen latent lifts were received in this case. One latent print of value remains unidentified in this case.

EXAMINED BY: David W. Hinebaugh *David W. Hinebaugh* DATE: September 9, 2013  
VERIFIED BY: Mary Ann Horton *MAH* DATE: September 9, 2013

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MONTGOMERY COUNTY DEPARTMENT OF POLICE

LATENT EXAMINATION REPORT

TO: ROBBERY SECTION

FROM: F.S.S., R.A.F.I.S. - LATENT SECTION

CR#: 13-037018

LOCATION: 19116-STALEYBRIDGE RD. DATE: 8-7-2013 Class: 0348

SUBJECT EXAMINED: MYERS JR., FLOYD ROGER ID#: 2247499 (MD)

RACE: B SEX: M DOB: 8-17-1983

FINGER: INKED PRINTS TAKEN BY: BRANSON #P99685 DATE: 2-6-2010

PALM: INKED PRINTS TAKEN BY: \_\_\_\_\_ DATE: \_\_\_\_\_

LATENTS SUBMITTED BY: KRAEMER #15637/KARSCHNER #19227 DATE: 8-8-2013

LATENTS SUBMITTED BY: \_\_\_\_\_ DATE: \_\_\_\_\_

BASIS FOR EXAMINATION:

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- ( ) AN IDENTIFICATION RESULTED BY SEARCHING THE LATENTS OBTAINED FROM THE OFFENSE FOR WHICH THE SUSPECT WAS ARRESTED.
- ( ) AN IDENTIFICATION RESULTED FROM A MANUAL SEARCH OF OUR FILES.

RESULTS: One latent print, lifted from "Center console cup holder lid", has been identified as the known print of Floyd Roger Myers Jr., MD SID# 2247499. Thirteen latent lifts were received in this case. One latent print of value remains unidentified in this case.

EXAMINED BY: David W. Hinebaugh *David W. Hinebaugh* DATE: September 9, 2013

VERIFIED BY: Mary Ann Horton *M.A.H.* DATE: September 9, 2013

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MONTGOMERY COUNTY DEPARTMENT OF POLICE

LATENT EXAMINATION REPORT

TO: ROBBERY SECTION

FROM: F.S.S., R.A.F.I.S. - LATENT SECTION

CR#: 13-037018

LOCATION: 19116 STALEYBRIDGE RD. DATE: 8-7-2013 Class: 0348

SUBJECT EXAMINED: HAMLETT, JOHN DAVID ID#: 2096558 (PG)

RACE: W SEX: M DOB: 9-29-1982

FINGER: INKED PRINTS TAKEN BY: TRUEBLOOD DATE: 5-20-2012

PALM: INKED PRINTS TAKEN BY: \_\_\_\_\_ DATE: \_\_\_\_\_

LATENTS SUBMITTED BY: KRAEMER #15637/KARSCHNER #19227 DATE: 8-8-2013

LATENTS SUBMITTED BY: \_\_\_\_\_ DATE: \_\_\_\_\_

BASIS FOR EXAMINATION:

- ( ) A MANUAL EXAMINATION WAS REQUESTED BY:
- (XXX) AN IDENTIFICATION RESULTED FROM AN AUTOMATED SEARCH OF OUR FILES.
- ( ) AN IDENTIFICATION RESULTED FROM AN AUTOMATED SEARCH OF THE STATE POLICE FILES. (cjis)
- ( ) AN IDENTIFICATION RESULTED BY SEARCHING THE LATENTS OBTAINED FROM THE OFFENSE FOR WHICH THE SUSPECT WAS ARRESTED.
- ( ) AN IDENTIFICATION RESULTED FROM A MANUAL SEARCH OF OUR FILES.

RESULTS: One latent print, lifted from "exterior front pass. door frame @ top", has been identified as the known print of John David Hamlett, PG CO ID# 2096558. Thirteen latent lifts were received in this case. One latent print of value remains unidentified in this case.

EXAMINED BY: David W. Hinebaugh *David W. Hinebaugh* DATE: September 9, 2013

VERIFIED BY: Mary Ann Horton *MAH* DATE: September 9, 2013

*62*

Exhibit (A)



DISTRICT COURT OF MARYLAND FOR Montgomery County - Rockville

(City/County)

LOCATED AT (COURT ADDRESS)  
191 East Jefferson Street  
Rockville, Maryland 20850-2325



DEFENDANT'S NAME (LAST, FIRST, M.I.)  
Adams, Bryan, Anthony

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 2 of 4

On 8/07/2013, Officer Stuehmeier ID#2361 and Detective Garcia ID#2334 of the Maryland-National Capital Park Police responded for an Armed Carjacking (Case # 13-001-060) at Fox Chapel Neighborhood Park (19121 Staleybridge Rd., Germantown, Montgomery County, Maryland, 20876), maintained and patrolled by the Maryland-National Capital Park Police (MNCPP).

The victims, Floyd Roger Myers Jr (V1) and John David Hamlett (V2), reported that on 8/7/2013 they were in a 2010 Mercedes-Benz S550 apartment shopping in the Germantown area. While driving through the neighborhood surrounding Fox Chapel Park, V1 decided to stop and urinate in the park. V1 and V2 state that while at the park a burgundy or maroon Honda Accord with tinted windows pulled into the park. Two suspects exited the Honda with handguns. Suspect #1 (S1) is described as a black male, 5'04" to 5'10", 220 lbs., short hair, with an African accent and appearance, armed with a silver and black long barrel handgun, possibly a revolver. Suspect #2 (S2) is described as a black male, 5'08" to 6'00", 180 lbs., 27 to 32 years old, full beard, armed with a silver and black handgun. S1 made V1 lay on the ground. V2 was ordered to exit the Mercedes-Benz and robbed at gunpoint of \$600.00 by S2. S2 got in the Mercedes-Benz and S1 got back in his Honda. S1 and S2 fled the scene in both vehicles. Montgomery County Police Sgt. Conroy ID #2051 located the vehicle at 20901 Queen Nicole Way, Germantown, Maryland using the Find My Phone app on V1's phone (V1's phone was left in the car at the time of the carjacking). I responded to Queen Nicole Way to take custody of the vehicle. The vehicle was towed to Montgomery County Vehicle Processing Facility (MCVPPF). I followed the vehicle from Queen Nicole way to the MCVPPF without losing sight. Montgomery County Police Forensic Services Section (FSS) took custody of the Mercedes-Benz upon arrival to MCVPPF.

On 8/08/2013 the Mercedes-Benz was processed by technicians Karschner # 19227 and Kraemer #15637 of MCP FSS.

On 8/9/2013 I spoke with V2 to obtain additional information concerning the incident. V2 stated "I don't know if this helps" but S1 told S2 to take the car, S2 told S1 "I can't take it, I just got out/ I just got home". S2 then got in the Mercedes-Benz and drove off.

On 9/11/2013 I received the Latent Examination Report for the above vehicle. The report states that four latent prints were lifted from the "steering wheel" and identified as the known prints of Bryan Anthony ADAMS D.O.B 11/22/1986 Montgomery County ID # 1022447.

Bryan Anthony Adams is described as a black male, 6'00", 200lbs., age 26.

Additional investigation revealed that ADAMS was released from incarceration on or about 7/15/2013. On 9/16/2013 I dropped in on ADAMS monthly appointment with Agent M. Anderson of Community Supervision with the Department of Public Safety and Correctional Services. ADAMS fits the description of S2 and had a "Full Beard".

Events occurred in Montgomery County Maryland

9/20/2013  
Date

 #2334  
Applicant's Signature



34

Exhibit (B)

- saw a male run up on Floyd. Floyd is  
urinating at this time

This male is: B/M (dark complexion), 27-32 y.o.

S#1: 5'4"-5'6", stocky (muscular)

short black hair

Blk shirt, blue jeans

revolver w/ long barrel; silver & black

John turns to look out passenger window  
and sees a male:

S#2 B/M brown (light) skinned

5'11"-6'00", ~~27-32~~ 27-32 y.o., <sup>full</sup> beard

purple/black Jordans, white t-shirt,

tan colored camo shorts

- semi-auto handgun silver/black

- suspect #2 told John to get out, lie down,

& give (S) every thing in pockets

obtained \$600.00 cash

- left phone in vehicle

- Floyd has gun to his ~~back~~ <sup>face</sup> & is backing up  
out of the park. Floyd then took off  
running

- S<sup>1</sup> told S<sup>2</sup> to get in the car

- S<sup>1</sup> hopped back into his car, S<sup>2</sup> drives off in  
blue Mercedes

121

3:25 pm

8/7

John Jamlett

X

Exhibit (C)



revolver run up to Floyd. He told Floyd "Take everything out of your pockets." I then turned

around and saw the taller light skinned

male at the passenger door. He was armed

with a silver and black handgun. He made

me exit the vehicle and lie on the ground.

He had me take everything out of my

pockets, which was about \$600.00. I saw

Floyd began backing up as the first

suspect held the gun to him. Once he

was at the edge of the park, he began

to run off. The dark male suspect told

suspect #2 to get in the car. Suspect #1

got inside his vehicle, the Honda.

124

8/7/325pm

8/7/325pm

8/7/325pm

8/7/325pm



1           A     -- the fingerprint, the known fingerprint card and it  
2 bears the name Bryan Anthony Adams on it.

3           Q     All right.

4           A     The other lifts taken from the steering wheel was no  
5 value, meaning, there is some detail in the, in the lift card  
6 but there's not sufficient quality to make a match.

7           Q     Right. As to those four prints, were those all  
8 entered into the WACIIS system?

9           A     Two of them were.

10          Q     Right. And on the two that were, did you receive the  
11 same identification number of Bryan Anthony Adams to attempt to  
12 make the comparison?

13          A     What I did was I entered in the print that I labeled  
14 No. 0, because that is the number given by our WACIIS system.  
15 I entered that one in and I entered in several others. When I  
16 got the results back for latent zero, that was the, the report  
17 that I referred to earlier that gave me the top 10 matches.

18          Q     Okay.

19          A     I also perform a comparison with the rest of the  
20 prints, however, I can't tell you whether the other print that  
21 I entered which is No. 1, I can't tell you if that was a match  
22 in the system because I did not save the report. But once I  
23 start making a manual comparison, I compare all the lists, all  
24 the prints in the case. So using the report that the WACIIS  
25 computer gave me, I, I pulled the ID, the card with the

David Kraback

1 fingerprint identification is a 100 percent positive method for  
2 identifying an individual.

3 Q When conducted correctly.

4 A When conducted correctly.

5 Q And is it your testimony today that it's always  
6 conducted correctly?

7 A No, there have been errors made by individuals  
8 comparing fingerprints.

9 Q And that's why you have two people, somebody to check  
10 your work?

11 A Yes.

12 Q ... Now you stated that the analysis you made started by  
13 submitting the latent prints to a database of known prints in  
14 Montgomery County and Prince George's County, is that correct?

15 A Yes.

16 Q And that database returned a set of 10 persons with  
17 prints that you could possibly check? -

18 A Yes.

19 Q And that database came up with numerical score?

20 A It did.

21 Q And do you know how the computer comes up with the  
22 numerical score?

23 A I do not know.

24 Q Okay. In this case, you looked at the first possible  
25 match that the computer came up with and you didn't check all

1 10, did you?

2 A No, I'm confident I did not check all 10.

3 Q Okay. Let me ask you a question about fingerprints  
4 in general. It's, will you agree that there are known, known  
5 studies that reliably prove when a fingerprint was placed on a  
6 surface?

7 A I would agree with that.

8 Q Okay. So you don't know by looking at a fingerprint  
9 if it was made one day earlier, two days earlier, or five days  
10 earlier?

11 A No, I do not know that.

12 Q Okay. And would you agree that certain variables  
13 such as humidity, temperature, and the amount that a person  
14 tends to perspire could affect how long a fingerprint stays on  
15 a surface?

16 A Yes.

17 Q Okay. Now you testified that you did not obtain any  
18 so called level three details during your analysis of these  
19 prints, correct?

20 A That's correct.

21 Q And, level three are the most detailed of the three  
22 levels of analysis, correct?

23 A Yes.

24 Q I'm going to show you --

25 MR. WRIGHT: May we approach, Your Honor?

Exhibit (G)

MARYLAND-NATIONAL CAPITAL PARK POLICE  
 MONTGOMERY COUNTY DIVISION  
 12751 LAYHILL RD SILVER SPG MD 20906 301.949.8011  
**SUPPLEMENT**

WRITER	REPORTING OFFICER (PRINT/SIGN)	ID#	DATE REPORTED	TIME REPORTED	IR#
	ORIGINAL REPORTING PERSON	ORIGINAL CRIME/INCIDENT REPORTED		RELATED IR #	

Det. Garcia	2334	9/26/2013	1159 hours	13-001-060
Officer Stuehmeier	Armed Carjacking			

This supplement report is in reference to an Armed Carjacking that took place on 8/7/2013 at Fox Chapel Neighborhood.

Investigation revealed the following :

On 8/08/2013 the Mercedes-Benz was processed by technicians Karschner # 19227 and Kraemer #15637 of MCP FSS.

On 8/9/2013 I spoke with V2 to obtain additional information concerning the incident. V2 stated "I don't know if this helps" but S1 told S2 to take the car; S2 told S1 "I can't take it, I just got out/ I just got home". S2 then got in the Mercedes-Benz and drove off.

On 9/11/2013 I received the Latent Examination Report for the Mercedes-Benz. The report states that four latent prints were lifted from the "steering wheel" and identified as the known prints of Bryan Anthony ADAMS D.O.B 11/22/1986 Montgomery County ID # 1022447.

Bryan Anthony Adams is described as a black male, 6'00", 200lbs., age 26.

Additional investigation revealed that ADAMS was released from incarceration on or about 7/15/2013. On 9/16/2013 I dropped in on ADAMS monthly appointment with Agent M. Anderson of Community Supervision with the Department of Public Safety and Correctional Services. ADAMS fits the description of S2 and had a "Full Beard".

Charges were applied for and a warrant (D130879125) was issued for the defendant:

Adams, Bryan Anthony  
 Black B/Male , D.O.B: 11/22/1986 of 8 Whetstone Drive Gaithersburg, MD 20877

This case is closed by arrest.

**FILE COPY**

ADMIN	SUPERVISOR	ID#	FOLLOWUP INVESTIGATION REQUESTED	ADMINISTRATIVE USE
	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> REP. OFC.			

pm 9/11 tape  
1 Q You're aware that there was a grinder in your car?

2 A Yes, sir.

3 Q Was that your grinder?

4 A Yes it was.

5 Q Okay. And was there some marijuana in the car?

6 A I don't believe so. But there probably was residue  
7 of marijuana in the grinder. Yes, sir. I smoked marijuana. Or  
8 I did at that time, anyway. I had, my back was really, really,  
9 bad, so yes, sir. I did.

10 Q Jumping back to the 9-1-1 call, I note you described  
11 a person as light-skinned in the 9-1-1 call. Do you recall  
12 that?

13 A That's what I said. Yes, sir.

14 Q And again, you say that they came out of nowhere.  
15 You didn't see them following you, you didn't have an  
16 appointment, you were not expecting to see anybody?

17 A No, sir.

18 Q You were temporarily stopped to take care of some  
19 business --

20 A Yes, sir.

21 Q -- and then, were you going to continue looking for  
22 houses?

23 A Yes, sir. After that, yeah, I was. Uh-huh.

24 MR. WRIGHT: Nothing further, Your Honor.

25 THE COURT: Any redirect?

1           Please keep the notepads in the courtroom. Whenever  
2 there's a break, just put them right on your chair. Ms. Norton  
3 is the only person who will touch them throughout the trial and  
4 afterwards, and after the trial she will shred your notes  
5 without looking at them. So whatever you want to write down is  
6 your private business. Let's just not try to be a court  
7 stenographer and take down every syllable, but listen to the  
8 testimony, take it all in, and just jot down notes as you  
9 believe necessary to jog your memory.

10           We'll just give you a minute or two now, in case  
11 somebody wants to get started with what they've heard so far.

12           So if you can just hang in there a bit, Mr. Wright.

13           Okay.

14           MR. WRIGHT: Good afternoon, Mr. Myers.

15           THE WITNESS: Hey, how are you doing, sir.

16                                   CROSS-EXAMINATION

17           BY MR. WRIGHT:

18           Q   Mr. Myers, can you see the defendant?

19           A   Yes, sir.

20           Q   And is he the person who robbed you that afternoon?

21           A   I've never seen that guy before, sir. So I wouldn't  
22 be able to say that was him. No, sir. The face that I  
23 remember, that's not the gentlemen there.

24           Q   Thank you. Now, you were looking for a place to rent  
25 that day?

Exhibit (H)

DISTRICT COURT OF MARYLAND FOR Montgomery County - Rockville (City/County)



LOCATED AT (COURT ADDRESS)  
191 East Jefferson Street  
Rockville, Maryland 20850-2325



RELATED CASES:

COMPLAINANT DEFENDANT

Det. Garcia  
Printed Name  
12751 Layhill Road  
Number and Street Address  
Silver Spring, Maryland 20906 3019621622  
City, State, and Zip Code Telephone  
HA, P, #2334  
Agency, sub-agency, and I.D.# (Officer Only)

Bryan Anthony Adams  
Printed Name  
8 Whetstone Drive  
Number and Street Address  
Gaithersburg, Maryland, 20877 2027046431  
City, State, and Zip Code Telephone  
CC#

DEFENDANT'S DESCRIPTION: Driver's License# A352098067893 Sex M Race 1 Ht 6'00" Wt 200  
Hair Black Eyes Unk Complexion Dark Other Tattoo/Forearm D.O.B 11/22/198 ID

APPLICATION FOR STATEMENT OF CHARGES Page 1 of 4

I, the undersigned, apply for statement of charges and a summons or warrant which may lead to the arrest of the above named Defendant because on or about 8/7/2013 at Fox Chapel Neighborhood Park 19121 Staleybridge Rd., Germantown, Montgomery County, Maryland, 20876 the above named Defendant

See Continued

FILE COPY

(Concise statement of facts showing that there is probable cause to believe that a crime has been committed and that the Defendant has committed it)

(Continued on attached 3 pages) (DC/CR 1A)

I solemnly affirm under the penalties of perjury that the contents of this Application are true to the best of my knowledge, information and belief.

9/20/2013

Date

Officer's Signature

I have read or had read to me and I understand the Notice on the back of this form.

9/20/2013

Date

Applicant's Signature

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_ Month \_\_\_\_\_ Year

Time: \_\_\_\_\_ M Judge/Commissioner \_\_\_\_\_ I.D.

I understand that a charging document will be issued and that I must appear for trial  on \_\_\_\_\_ Date at \_\_\_\_\_,  when notified by the Clerk, at the Court location shown at the top of this form.

Time

Applicant's Signature

- I have advised applicant of shielding right.  Applicant declines shielding.
- I declined to issue a charging document because of lack of probable cause.

Date

Commissioner

I.D.



33

Exhibit (H)

Effective Date: 2002-10-18  
Type: 4  
Time Period: 5808  
Suspension Code: 5808

PERSONAL INFORMATION



Soundex: A 352-098-067-893  
Name: BRYAN ANTHONY ADAMS  
Height: 6-00  
Weight: 200  
Race: 1  
Sex: M  
DOB: 11-22-86  
Privacy: YES  
Special: NONE

Residence Street Address: 19622 SCENERY DR  
Residence City: GERMANTOWN  
Residence State: MD  
Residence Zip Code: 20876

Driver License Status: REVOKED  
CDL License Status: REVOKED

ID	License Class	GLS Type	License Type	License Duplicate	License Doc	License Issue Date	License Expiration Date	Endorsement	Restriction Code	Special Restrictions
N						09-22-11	09-22-16			

Total Points: 00

48



1 MR. WRIGHT: I'm going to object to the ongoing  
2 nature of the answer.

\* 3 THE COURT: Well the question is what he said, so  
4 your objection as the ongoing nature is overruled.

5 MS. FENTON: Thank you.

6 BY MS. FENTON:

7 Q Please continue, Detective.

\* 8 A So he said he, you know, in the statement, he  
9 continued to tell me that he went to the park to use -- you  
10 know, once he realized he was there in this park, he was going  
11 to use the restroom. He says then that he got out of his  
12 vehicle to use the restroom when all of a sudden, this burgundy  
13 vehicle --

\* 14 MR. WRIGHT: I'm also going to object to the  
15 duplicitous nature of the question and answer. We've already  
16 gone over all this directly with the witness himself. And now  
17 we're just hearing out-of-court statements. The truth of the  
18 matters asserted were already asked and answered by Mr. Myers.

19 THE COURT: Your objecting then, on --

'20 MR. WRIGHT: Pardon?

21 THE COURT: -- the duplicative nature and hearsay?

22 MR. WRIGHT: Yes. The repetitive --

23 THE COURT: Okay, I hear you.

24 MR. WRIGHT: -- asked and answered by --

25 THE COURT: What is your objection on the hearsay?

pm

1 MS. FENTON: Your Honor, this would be a prior  
2 THE COURT: Your response on the --

3 MS. FENTON: -- a prior consistent statement, a  
4 signed statement, made by Mr. Hamlett to Detective Garcia.  
5

6 THE COURT: Come to the bench, if you would.  
(Bench conference follows:)

7 THE COURT: You're offering prior consistent  
8 statement for the truth of the matter.

9 MS. FENTON: The truth of the matter because he was  
10 questioned about making this up.

11 THE COURT: So you contend he was impeached --  
12 MS. FENTON: Yes.

13 THE COURT: -- on whether or not --  
14 MS. FENTON: Yes.

15 THE COURT: -- he is consistent. Okay.  
16 MS. FENTON: 612, 613. Okay.

17 THE COURT: Okay. I mean, certainly the nature of  
18 the cross-examination of the alleged victim was that this --  
19 and the opening statement -- but I'm really focusing on the  
20 cross-examination, was in essence, this was, the victim himself  
21 was up to some shenanigans and was impeached, at least  
22 implicitly, or attempted to be impeached. And this is a prior  
23 consistent statement being offered for the truth of the matter  
24 to show a consistent statement.

25 MS. FENTON: You want it?

1 THE COURT: Yeah. Let me just see the 512 and see if  
2 there's something of it, listed on the rule.

3 MR. WRIGHT: Which was the rule?

4 MS. FENTON: 612.

5 MR. WRIGHT: She's going beyond whatever rule of  
6 inconsistency had brought out. And basically forming a whole  
7 statement.

8 MS. FENTON: Which is, I think, under the case law  
9 and Rule 613 that we're allowed to do.

10 THE COURT: Which one? 6 --

11 MS. FENTON: 13. You've got an old book I think.  
12 No, you're good.

13 THE COURT: Okay. I think it fits within the  
14 exception of prior statements, prior consistent statements.

15 MS. FENTON: Thank you.

16 (Bench conference concluded.)

17 THE COURT: The objection's overruled.

18 DIRECT EXAMINATION (Continued)

19 BY MS. FENTON:

\* 20 Q You may continue, Detective. What did he tell you  
21 that happened after he pulled into the park to use the  
22 restroom?

\* 23 A Sorry. He said he pulled into the park and got out  
24 of the vehicle to use the restroom when, as he described it, he  
25 said in his statement was as, a burgundy vehicle I believe, he

pm

\* 1 described it as a Honda Accord, came into the park at a  
2 rate of speed. Two black males got out. He -- two black  
3 got out. He says, I think he was trying to urinate but wasn't  
4 able to. One black, one of the black males came up to him and,  
5 you know, said "Give me everything" and the victim Floyd Myers  
6 stated that he emptied out his pocket, and he had change that I  
7 guess eventually landed on the floor. And he took off running,  
8 leaving his friend, John David Hamlett, behind.

9 Q Okay. Did he indicate whether or not there were any  
10 weapons involved?

11 A Yes.

12 Q What did he say about the weapons?

13 A He said that, he said that they both had silver --  
14 can I refer to my notes real quick?

15 Q Will it refresh your recollection?

16 A Yes.

17 Q Yes.

18 A Okay.

19 Q Does that refresh your recollection, to look at your  
20 notes?

21 A Yes.

22 Q What do they say about the guns?

23 A It said that it was a silver and black revolver with  
24 a long barrel.

25 Q Okay. Now, was Mr. Myers able to provide a

1 description of the two suspects?

2 A Yes.

3 Q And what did he describe, suspect number one or  
4 suspect number two that approached him?

5 A He described suspect number one.

6 Q As the man who approached him?

7 A Correct.

8 Q All right. I'm going to refer your notes, if you  
9 didn't see, over to State's Exhibit No. 1 -- I know it's kind  
10 of far away. But previously they admitted it, State's Exhibit  
11 No. 1. Did he provide this sketch to you?

12 A I had a couple of sketches --

13 Q Here.

14 A -- I'm trying to see which one. Yes, this is the one  
15 from Floyd Myers.

16 Q Okay. And Mr. Myers signed it in your presence?

17 A Correct.

18 Q Okay. So actually the ladies and gentlemen of the  
19 jury have seen this already, so this will be a little bit  
20 easier. Which vehicle was Mr. Myers in?

21 A Number one, which is right here, and it was facing  
22 the -- it was facing like it was going to drive out of the  
23 park.

\* 24 Q Okay. So is this the trajectory that he said he  
25 drove in?

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CLOSING ARGUMENT BY DANIEL J. WRIGHT, ESQ.

ON BEHALF OF THE DEFENDANT

What we have in this case is failure of evidence. The one person who was there says that Bryan Adams wasn't present. Floyd Meyers looked over and clearly articulated that he had never seen Bryan Adams before. He said he was not one of the persons who stole his car that day. He was the only one who was there. And as you remember, there was no hesitation in his voice. He was confident of his (unintelligible). He was only a few feet away from the people that he claims robbed his car. The event took place in broad daylight, he had a clear view. It wasn't at night. He had no problem being able to see. He wasn't, he was wearing glasses that day. There were no obstructions to his vision, nothing in his way. That's why the prosecutors never asked him to identify Bryan Adams as one of the robbers (unintelligible).

\* Detective Garcia admitted he never showed of Bryan Adams to Mr. Meyer to ask him to identify, and by the way, the statement was a light skinned, not medium skinned \*. So in this regard, the State is asking you to believe things that their own witness doesn't believe. Their own witness doesn't believe that Bryan Adams was one of the people now. He made it clear. I didn't pull that off of him, he wasn't reluctant to give his opinion.

Where is John Hamlet? Why isn't he here to testify?

Accomplice liability

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THE COURT: Okay. Your objection is noted.

MS. FENTON: But the State, I thought I had requested and I apologize if I didn't and you had already started when this was handed to us, so I know we didn't take a break, 6:02 which is a complex liability and that (unintelligible) --

THE COURT: It's what?

MS. FENTON: A complex liability.

THE COURT: Yes, it's not in here.

MS. FENTON: We worried that it wasn't and I just looked at it. I apologize but (unintelligible) very quickly in terms of looking at the instructions, the two co-defendants, the two men that got out of the car they would be --

THE COURT: Both accomplices.

MS. FENTON: I think it's 6:02, and I apologize, I don't have my instruction notice in front of me. I assume I left it out if you clerk didn't put it in there. But the two individuals would be jointly responsible for both. I'm only going to be about 20 minutes, so I know, I'm not going to do a power point.

THE COURT: You're --

MS. FENTON: It will take longer for my guys to come over and set it up, so.

THE COURT: Okay. We are coming back at about 1:30.

MS. FENTON: Okay.

THE COURT: I'll keep, I think the accomplice

1 Did the police really try to locate him? Finding people is  
2 what the police do. There's been no testimony from John Hamlet  
3 that either he was there that day, he was robbed or  
4 (unintelligible). Detective Garcia from his part seemed to  
5 have a lot of trouble remembering events that day. It was bad  
6 enough he wasn't prepared, he couldn't, he was constantly  
7 referring to his notes. He stumbled and fumbled, nothing he  
8 said really had any credibility. He admitted that he didn't  
9 ask Floyd Meyers to ID the defendant. He didn't send the box  
10 of marijuana to be tested in the crime lab\*. What kind of  
11 investigation is this?\*. And they are missing evidence, where  
12 are these guns?\*. They didn't find any gun on Bryan Adams or on  
13 anyone else.\*

14           The prosecution says money was stolen. No money was  
15 recovered from my client or anyone else. The fingerprint  
16 evidence I would submit is not conclusive. Look at some of the  
17 prints, this is a blown up version of the fingerprint. This is  
18 their best shot? This is their best evidence? Fingerprint,  
19 smudgy, partial, (unintelligible) this can't equate to proof  
20 beyond a reasonable doubt of what happened that day when we  
21 have eyewitnesses saying otherwise. \*

22           Mr. Hinebaugh admitted that he stopped looking after  
23 the first of the 10 attempts. He admitted that he only  
24 (unintelligible) two, evidence which you can see for yourself  
25 (unintelligible) and there's no way to tell how long the



Accomplish Habitual

1 instruction is appropriate and the State not having had an  
2 opportunity for us all to really chat about jury instructions  
3 because we went sort of headlong into them. It certainly would  
4 have come up in the course of our review of the instructions,  
5 so I think the supplement will be appropriate. I'll let the  
6 jury know, I'll give them a couple of more instructions that  
7 are not to be given any greater weight than any of the other  
8 instructions because they are given separately, but these are  
9 the instructions.

10 MS. FENTON: Okay.

11 MR. WRIGHT: Okay.

12 MS. FENTON: Can I think of, I know the first  
13 paragraph, it's the most applicable because when it's aiding  
14 and abetting after the fact and all that.

15 THE COURT: Can you email that too when you get down  
16 there actually? I gave them your presence at, we gave them in  
17 your presence, yes.

18 MS. FENTON: You did the presence, yes.

19 THE COURT: So somehow or another, okay. So it's  
20 just the first paragraph that I would give in pattern 6:00.

21 MS. FENTON: Yes.

22 THE COURT: I'm not going to fill in the blank on the  
23 crime, I'm just going to say guilty of a crime.

24 MS. FENTON: That's my only request. Thank you. I  
25 apologize for that omission.

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I.

The government finger prints expert was in error for not following finger protocol by standards of professional ethics and codes in which he received (13) prints that were lifted from the vehicle. He only analyzed (6) prints out of the (13) that was retrieved from the crime scene, instead he stopped the process and he chose to use his personal feelings or opinion in which was very unprofessional on his part in which he violated my due process rights.

II.

Detective Garcia erred for given an out of court identification in which the declarant already gave in his identification testimony and report.

III.

The lower court erred by allowing the state to introduce OUT OF COURT STATEMENTS for identification of Mr. Adams alleged victims.

VI.

The evidence in this case was circumstantial with little to none corroborated evidence , Detectives, and finger print experts not following protocol or procedure and a victim that gives a description that's other than the defendant and comes to court and defendant of ever being there.

V.

Trial Counsel erred in not objecting to instruction of accomplice liability. There was no evidence to suggest an instruction of such. Defendant didn't have a co-defendant or witness to place on scene or with the crime at anytime. In fact victim acknowledge defendant wasn't even there and his description doesn't even match.

VI.

The Defendant Counselor was ineffective assistance of counselor for not interviewing or calling exculpatory witness (Alibi) to support Mr. Adams where about; position in this joy ride.

## I. Fingerprint Title

The government fingerprint expert was in error for not following fingerprint protocol by standards of professional ethics & codes in which he received (13) prints that were lifted from the vehicle. He only analyzed (6) prints out of the (13) that was retrieved from the crime scene. Instead he stopped the process and he chose to use his personal feelings or opinion in which was very unprofessional on his part in which he violated my due process rights.

### Fingerprints

The trial counsel was ineffective for failing to call defense fingerprints expert to challenge the "process" the lower court erred by allowing state expert not processing the evidence "fingerprints" entirely for all identification.

On the day after the offense Aug. 8, 2013, Technician Karschner #19227 and Kraemer #15637 processed Mercedes-Benz, in which they found (13) thirteen prints from the vehicle. Nonetheless, only (6) six prints were process through the database for identification. In which was very unprofessional on the detective and technician failing to follow protocol & standards of fingerprint process. See. App. (123)

Detective Garcia received the latent examination report stating that (4) four latent prints were lifted from "steering wheel" identified as Bryan Anthony Adams. See App. (4)

At trial fingerprint expert David Hinebaugh See TT May 13, 2014 pg. 50 line 16 to pg. 51 line 2 See App. (5,6,7) when defendants lawyer asks Mr. Hinebaugh about not checking all 10 of the "Hits" that the database gave him. He stated he's confident he didn't check all 10.

It would be unprofessional for fingerprint expert to guess without doing my due diligence and looking at the information before he can answer that properly. It would be unprofessional of the expert to guess as to information that He cannot ascertain, verily or dispute without taking time to look at or complete the full process in it's entirety.

Analyzing each print from a crime scene and process them through accordingly, so that the identification can be established if a match or matches fit that print amongst others in the database... Instead of using their or his personal opinion or feelings concerned.

My lawyer was ineffective for not challenging fingerprint experts analysis also for not calling my exculpatory witness after I asked him. Saying it wasn't part of his strategy. See App. ( ) Affidavit.

## Fingerprints

Accordingly, the trial counsel was ineffective for failing to call defense fingerprint expert, to challenge the "process". The lower court erred by allowing state expert not processing the evidence "fingerprints entirety for all identification. The error was not harmless, and this court must reverse the judgment below.

For all these reasons, the state failed to present sufficient evidence that Mr. Adams was guilty of car jacking and armed robbery, and this court must reverse the convictions.

## II. Identification Title

Det. Garcia erred for given an out of court identification in which the declarant already gave in his testimony and report.

The lead detective went to see my parole officer Ms. Anderson and she showed him a picture of my Maryland I.D. and he used that to make an out of court identification, stating that I was suspect #2. In which the court was in error for letting his out of court statements and identification in, because the victim (declarant) already gave an in court I.D. on suspect #2. See transcripts see app. (4, 8, 9, 10, & 11, 12, 13, 14) also discovery of description both victims gave of suspects with no mask. Both individuals (victims) made the same description of suspects. The discription the lead detective gave to courts contradicts both victims and clearly is in violation of code 5-801, 5-802 & 5-803.

Identification on pg. 34 of discovery exhibit 4 warrant affidavit statement of charges suspect #2 is described as black male, 5'8 to 6'0", 180 lbs, 27 to 32 y.o. full beard. on pg. 121 of discovery exhibit (10, 11) the victim who actually got robbed by suspect #2 describes him as brown (light) skinned 5'11 to 6'0 ft 27 20 32 y.o., full beard. exhibit See App. (11) (C) pg. 124 of discovery in victims statement (John Hamlett) he is quoted as saying "I then turned around and saw the taller light-skinned male at the passenger door. See App. Exhibit (d) on victims 911 tape his initial statement he describes suspects #2 as light skinned. (see 911 tape) at trial exhibit (E) TT see (15) pg. 127 line 18 -23 (See App. 13) when defendants lawyer asks victim is that the man that robbed you? Victim (Floyd Myers) stated, "I've never seen that guy before Sir. So I wouldn't be able to say it was him. No. Sir, the face that I remember that's not the gentlemen there" Continued on pg. 131 line 10 - 13 defendants (See App. 16) lawyer asks (Floyd Myers)

Q. Jumping back to the 911 tape, I note you described a person as light skinned in the 911 call. Do you re call that ?

A. That's what I said, yes sir. On pg. 3 of discovery exhibit (f) (See App. 4) lead det. Garcia states Adams fits description of Suspect #2 and had a "full beard". On pg. 33 of discovery exhibit (12) on application for statement of charges they took my description from my driver's license #A352098067893, sex- male, race 1, height- 6'0 ft. weight - 200 lbs. hair - black, eyes - unk, complexion - dark D.O.B. 11-22-1986. This description clearly differs from both victims. Detective clearly disregarded the facts in the description.

Accordingly the Det. Garcia erred by given an out of court identification in which the declarant already gave in his identification testimony and report which wasn't a harmless error, and this court must reverse the judgment below.

Identification.

For all these reasons, the state failed to present sufficient evidence that Mr. Adams was guilty of car jacking and Armed Robbery and this court must reverse the conviction.

III. ARGUMENT

1.

The lower court erred by allowing the state to introduce out of court state statements for identification of Mr. Adams alleged victims

During direct examination of Detective Garcia, defense counsel objected. When the detectives start to give several out of court statements about identifications:

[PROSECUTOR] Okay, so did you take a statement from Mr. Myers that day?

[Detective Garcia] I did.

[PROSECUTOR] All right. And what was it that he told you?

[Detective Garcia] He told me that he was in the area looking for apartment. He was apartment shopping. He was with his friend John David Hamlett, and they were in that area looking for, you know, apartments. Somewhere new to live. He wanted to be closer to his child's school. He currently lived in Laurel, and he was looking to move out in that area. He said that he went to Park, to Fox Chapel Park, and to use the rest room. He says he didn't you know, he didn't know it was a park there. He said he was, as he's looking around for apartments or places to live, he ended up at this park and said, you know, well he told me he said...

[Defense Counselor] I'm going to object to the ongoing nature of the answer.

[The Court] well the question is what he said, so your objection as the on going nature is overruled.

[PROSECUTOR] Thank you

[PROSECUTOR] Please continue, Detective

[Detective Garcia] So he said he, you know, in the statement he continued to tell me that he went to the park to use --- you know, once he realized he was there in this Park, he was going to use the rest room. He says then that he got out of his vehicle to use the rest room when all of a sudden, this burgundy vehicle

[Defense Counselor] I'm also going to object to the duplicitous nature of the question and answer. We've already gone over all this directly with the witness himself. And now we're just hearing out of court statements. The truth of the matters asserted were already asked and answered by Mr. Myers. TT Trial Transcripts page 146 14-25, page 147 1-25 )see App.) Also, (See App.) Page 150, TT 1-25

[PROSECUTOR] Okay. Now, was Mr. Myers able to provide a description of the two suspects?

[Detective Garcia] Yes.

[PROSECUTOR] Okay. Was Mr. Myers able to a description of the individual who came up to him?

[Detective Garcia] Yes.

[PROSECUTOR] and by looking at your notes, does it help you, or does it refresh your recollection about the description Mr. Myers gave of suspect number two?

[Detective Garcia] Yes. Floyd Myers for suspect number two said that he was approximately 180 pounds and about 5'8" about to approximately 5'10", so around the same height. TT Trial Transcripts 1-7 page 154 Detective Garcia continue to testify about Mr. Myers's account of the car jacking robbery (TT Trial Transcripts page 146 14-25). The lower court committed reversible error by allowing Detective Garcia to give this lengthy hearsay testimony regarding Mr. Myers said about Mr. Adams's alleged involvement in the Car Jacking Robbery. Hearsay is any "Statement, other than one made by the declarant while testifying at the trial...Offered in evidence to prove the truth of the matter asserted. Ali v. State, 314 Md. 295, 304, 550 A.2d 925 (1988) See also Md. Rules 5-801, 5-802. Also See App. 19, 20, 21, 22

3.

Generally, statements made out of court that are offered for their truth are inadmissible as hearsay about circumstances bringing the statements within a recognized exception to the hearsay rule. "Su v. weaver, 313 Md. 370 376, 545 A.2d 692, 694 (1988)" If one or more hearsay statements are contained within another hearsay statement, each must fall within an exception to the hearsay rule in order not to be excluded by that rule. "Md. Rule 5-805." Whether evidence is hearsay is an issue of law reviewed de novo." Gordon v. State, 431 Md. 527, 536, 66 A.3d 647, 652 (2013) Thus, the statements were inadmissible, and the lower court erred by allowing the State to elicit this portion of Detective Garcia's testimony. The Lower Court's error was not harmless beyond a reasonable doubt. Once it has been determined that error was committed, reversal is required unless the error did not influence the verdict; the error is harmless only if it did not play any role in the jury's verdict. The reviewing court must exclude that possibility beyond a reasonable doubt. Bellamy v. State, 403 Md. 308, 332, 941 A.2d 1107, 112 (2008) (emphasis added) (internal quotation marks omitted). "The harmless error standard is highly favorable to the defendant and the burden is on the state to show that the error was harmless beyond a reasonable doubt and did not influence the outcome of the case. The

state cannot meet its burden in this case. Detective Garcia's testimony allowed the State to improperly bolster the testimony of Mr. Myers. The victim clearly stated that the Suspect #2 was a light skinned man (see his statement in the Police Report etc.) Also, see TT Trial Transcripts See App (11,16) When Mr. Myer's made it very clear he never seen this man before and Mr. Adams is not the man that robbed him or took his belonging. Quote;

[Defense Counselor] TT Trial Transcripts, page 127, 18-23 Mr. Myers, can you see the defendant?

[Mr. Myers] Yes. Sir

[Defense Counselor] and is he the person who robbed you that afternoon?

[Mr. Myers] I've never seen that guy before, Sir. So I wouldn't be able to say that was him. No, Sir. The face that I remember, that's not the gentleman there.

[Defense Counsel] TT Trial Transcripts page 131, 10-13 Jumping back to the 9-1-1 call, I note you described a person as light-skinned in the 9-1-1 call. Do you recall that?

[Mr. Myers] that's what I said. Yes Sir. See app. (15,16) (Detective John Hamlett 8-7-13, 3:25 pm report. See App Suspect #2 B/M brown (light) skinned, 5'11" - 6'11)", 27-32 yr., full beard purple/black Jordans, white t-shirt, tan colored camo shorts - semi-auto handgun silver/black, See App. (11)

Indeed Detective Garcia testified that Mr. Myer told him many details that were notably absent from his in court testimony. accordingly, the error in admitting his out of court statements was not harmless, and this court must reverse the judgment below.



On August 8th See App. (4) latent examiners Kraemer #15637 & Karschner #19227 lifted 13 prints from vehicle of value, only one couldn't be identified. According to the investigation they identified 6 but; never show any evidence or information on the other 6.

See TT App. (6,7) May 13, 2014 pg. 50 line 16 to pg. 51 line 2. Fingerprint expert David Hinebaugh Clearly states he got a list of 10 possible hits from the fingerprint system and only check the 1st one because he was confident violating protocol.

See App. (22) Det. Garcia clearly admits to never putting defendant in a line up to be identified, never testing the box of marijuana. Also he clearly changed pertinent facts of the victims description. Victims clearly stated other individual was light skinned not brown skinned or medium complexion.

Accordingly the error is admitting his out of court statements which harmless, and this court must reverse the judgment below.

For all these reasons, the state failed to present sufficient evidence that Mr. Adams was guilty of car jacking & armed robbery, and this court must reverse the convictions.

#### IV. Title of Inconclusive

The evidence in this case was circumstantial with little to no corroborated evidence. Detectives and fingerprint experts not following protocol or procedure and a victim that gives a description that's other than the defendant and comes to court and denies defendant of ever being there.

#### Inconclusive Investigation

The evidence in this case was (App 23 & 24) See (TT) pg. 118 17-19 beyond a reasonable doubt Det. Garcia never put defendant in a line up for the victim (Floyd Myers) to identify him. He bluntly disregarded the light skinned description the victim gave of Suspect #2 when defendant is medium skinned. Pg. 119 TT 9-23 See App. (23) there was marijuana found that was never sent to be tested in the crime lab, no guns found and no money. Fingerprint expert also didn't follow protocol and training of the oath he gave and disregarded key evidence to get a conviction never bothering to look at the other hits after the 1st attempt. See App. (1,2,3) Latent Examiners Kraemer #15637 & Karschner #19227 lifted 13 thirteen prints from the car on Aug. 8th, 2013 out of all 13 prints, 4 identified as defendant, 1 as Floyd Myers and 1 as John Hamlett and one print unidentified in this case so what happened to the other 6?

Accordingly, the error is insufficient evidence which lead to a inconclusive investigation which wasn't harmless, and this court must reverse the judgment below.

For all these reasons, the state failed to present sufficient evidence that Mr. Adams was guilty of car jacking and armed robbery, and this court must reverse the convictions

#### V. Accomplice Liability

Trial Counsel erred in not objecting to instruction of accomplice liability. There was no evidence to suggest an instruction of such. Defendant didn't have a co-defendant or witness to place on scene or with the crime at anytime! In fact victim acknowledges defendant wasn't even there and his description doesn't even match See App. (24, 25, 26)

Accomplices evidence not deemed sufficient unless corroborated by another witness not an accomplice.

Accordingly, trial counsel erred in not objecting to instruction of accomplice liability this issue is not harmless and this court must reverse the judgment below.

For all these reasons, the state failed to present sufficient evidence that Mr. Adams was guilty of car jacking and armed robbery and this court must reverse the conviction

For all these reasons, the state failed to present sufficient evidence that Mr. Adams was guilty of car jacking and armed robbery, and this court must reverse the convictions.

### Conclusion

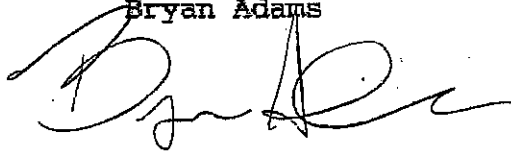
There are many factors in this case that have not been proven beyond a reasonable doubt. The only victim knows petitioner wasn't there and has attested to this fact on the stand, even confirming that the other suspect was light-skinned and not the complexion of petitioner (See App. 15 & 16) A fingerprint expert that has done less than stellar job of following protocol and denying petitioner his due process rights stating; the received list of 10 possible matches (hits) and he never checked them all only one, because he was confident. See App (6 and 7 also, receiving 13 latent prints of value but; only processing 6 leaving 7 unanswered see app (1, 2, 3) a detective testifying to statements he had no knowledge of and also testifying saying petitioner said he was never in a Mercedes vehicle which wasn't ever mention on DVD interrogation (See DVD) At no time did detective clarify the vehicle's color or make. Also see App. (19-23) A victim that gives a clear description of suspect and a detective that shows a reckless disregard for the truth see app (4 and 15) lastly, a inconclusive investigation, marijuana found in car that was never tested suspect never placed in a line up description given of suspect that clearly wouldn't match petitioner, leaving fingerprints unanswered never doing a thorough job because the expert feels confident. Detective giving out of court statements to events that he doesn't have any personal knowledge too and confirming things about petitioner that weren't true. See App (19-27) a judge that believes victim was up to some shenanigans see App. 19 line 21. No DNA found of suspect. Trial Court gave an instruction of accomplice liability which petitioner's lawyer never objected to petitioner doesn't have a co-defendant or anyone that can place him at crime scene or can say he knowingly or willingly did anything (se app. 24 and 25)

The victim clearly stated "I've never seen that guy before Sir. So I wouldn't be able to say it was him. No, Sir, the face that I remember that's not the gentleman there. This was the only victim who came to trial with the same statement from the beginning never changing his statement.

For the foregoing reasons, Mr. Adams respectfully requests that this court reverse the judgment of the court.

Respectfully Submitted,

Bryan Adams



CERTIFICATE OF SERVICE

I hereby certify that on this date of July \_\_\_\_\_, 2016, a copy of the forgoing motion of "POST CONVICTION HEARING" was served via hand delivery on:

Office of the Assistant States Attorney  
50 Maryland Avenue  
Rockville, Maryland 20850

APPENDIX

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