

Manslaughter, vehicular

State of Maryland,

City of Baltimore, to wit:

IN THE CIRCUIT COURT FOR BALTIMORE CITY

The State of Maryland

-vs-

Heather Cook

Defendant(s):

Date of Offense: December 27, 2014

Location : 5700 Block of Roland Avenue

Complainant: Thomas Palermo

INDICTMENT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about the date(s) of offense set forth above, at the location(s) set forth above, in the City of Baltimore, State of Maryland, did kill the aforesaid Complainant in a grossly negligent manner, in violation of Criminal Law Article, Section 2-209 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[CR 2-209] 1 0909

SECOND COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about the date(s) of offense set forth above, at the location(s) set forth above, in the City of Baltimore, State of Maryland, did cause the death of the aforesaid Complainant by driving, operating and controlling a vehicle and vessel in a criminally negligent manner, in violation of Criminal Law Article, Section 2-210 of the Annotated Code of Maryland; against the peace, government, and dignity of the State.; against the peace, government and dignity of the State.

[CR 2-210] 1 1611

THIRD COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about the date(s) of offense set forth above, at the location(s) set forth above, in the City of Baltimore, State of Maryland, did commit homicide by motor vehicle or vessel while under the influence of alcohol and under the influence of alcohol per se by killing the aforesaid Complainant, in violation of Criminal Law Article, Section 2-503 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[CR 2-501; 2-503; CR 2-507(a)(1)-(2)] 1 0900

FOURTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about the date(s) of offense set forth above, at the location(s) set forth above, in the City of Baltimore, State of Maryland, did commit homicide by motor vehicle or vessel while impaired by alcohol by killing the aforesaid Complainant, in violation of Criminal Law Article, Section 2-504 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[CR 2-504; CR 2-507(a)(3)] 1 0693

FIFTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about the date(s) of offense set forth above, at the location(s) set forth above, in the City of Baltimore, State of Maryland, being the driver of a vehicle involved in an accident that resulted in the death of another person, did fail to stop the vehicle immediately as close as possible to the scene of the accident without obstructing traffic more than necessary and remain at the scene of the accident, and knew and reasonably should have known that the accident might result in the death of another person, in violation of Transportation Article, Sections 20-102 and 27-113 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[TR 20-102(b); TR 27-113(c)] no CJIS code

SIXTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about the date(s) of offense set forth above, at the location(s) set forth above, in the City of Baltimore, State of Maryland, being the driver of a vehicle involved in an accident that resulted in serious bodily injury to another person, did fail to stop the vehicle immediately as close as possible to the scene of the accident without obstructing traffic more than necessary and remain at the scene of the accident, and knew and reasonably should have known that the accident might result in serious bodily injury to another person, in violation of Transportation Article, Sections 20-102 and 27-113 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[TR 20-102(a); TR 27-113(a); TR 27-113(b)] no CJIS code

SEVENTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about the date(s) of offense set forth above, at the location(s) set forth above, in the City of Baltimore, State of Maryland, did drive and attempt to drive any vehicle while under the influence of alcohol in violation of Transportation Article, Section 21-902 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[TR 21-902(a); TR 27-101(k)] no CJIS code

EIGHTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about the date(s) of offense set forth above, at the location(s) set forth above, in the City of Baltimore, State of Maryland, did drive and attempt to drive any vehicle while under the influence of alcohol per se, in violation of Transportation Article, Section 21-902 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[TR 21-902(a); TR 27-101(k)] no CJIS code

NINTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about the date(s) of offense set forth above, at the location(s) set forth above, in the City of Baltimore, State of Maryland, did drive and attempt to drive any vehicle while impaired by alcohol, in violation of Transportation Article, Section 21-902 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[TR 21-902(b); TR 27-101(c)(23)] no CJIS code

TENTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about the date(s) of offense set forth above, at the location(s) set forth above, in the City of Baltimore, State of Maryland, did violate TR 21-1124.1, to wit texting while driving, and caused an accident which directly led to the death, or serious bodily injury of another of the Transportation Article of the Motor Vehicle Laws of the State of Maryland; contrary to the form of the Act of Assembly, in such case made and provided, and against the peace, government and dignity of the State.; against the peace, government and dignity of the State.

[TR 21 1124.3] [TR 21 1124.3]

ELEVENTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about the date(s) of offense set forth above, at the location(s) set forth above, in the City of Baltimore, State of Maryland, did (write, send, read) a (text, electronic) messages while operating a motor vehicle, in said City, in Violation of Title 21, Section 1124.1 (b) of the Transportation Article of the Motor Vehicle Laws of the State of Maryland; contrary to the form of the Act of Assembly, in such case made and provided, and against the peace, government and dignity of the State.; against the peace, government and dignity of the State.

[TR 21 1124.1 (b)] [TR 21 1124.1 (b)]

TWELFTH COUNT

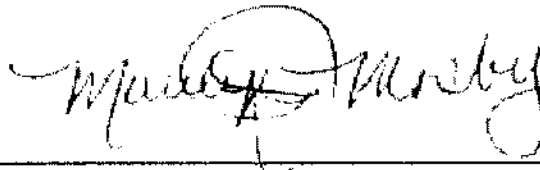
The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about the date(s) of offense set forth above, at the location(s) set forth above, in the City of Baltimore, State of Maryland, did drive a motor vehicle in wanton and willful disregard for the safety of persons and property and in a manner that indicated a wanton and willful disregard for the safety of persons and property, in violation of Transportation Article, Sections 21-901.1 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[TR 21-901.1(a); TR 27-101(g)(3)] no CJIS code

THIRTEENTH COUNT

The Jurors of the State of Maryland for the body of the City of Baltimore, do on their oath present that the aforesaid DEFENDANT(S), late of said City, heretofore on or about the date(s) of offense set forth above, at the location(s) set forth above, in the City of Baltimore, State of Maryland, did drive a motor vehicle in a careless and imprudent manner that endangered property and the life and person of any individual, in violation of Transportation Article, Sections 21-901.1 of the Annotated Code of Maryland; against the peace, government and dignity of the State.

[TR 21-901.1(b); TR 27-101(b)] no CJIS code

A handwritten signature in cursive script, appearing to read "Mark A. Mosby". The signature is written in black ink and is positioned above a horizontal line.

The State's Attorney for the City of Baltimore

STATE OF MARYLAND

vs.

Heather Cook
8 Knoll Ridge Court Apt. 1722
Baltimore, MD 21210
D.O.B. 09/21/1956
BPI# SID# 3591920
Trkg.# 141001989435
District Ct# 2B02285572
CC# 145L10463

Bail

Indictment

(TRUE BILL)

Foreman

Filed

WITNESSES:

Detective Edgardo Mercado H991
BCPD- AIU 242 West 29th Street 21211-2908

Manslaughter, vehicular

Drawn
O.K.
O.K.
ASA Kurt Bjorklund #66025

1. This paper charges you with committing a crime.
2. If you have been arrested, You have the right to have a judicial officer decide whether you should be released from jail until trial.
3. You have the right to have a lawyer.
4. 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 get a fair penalty if convicted.
5. Even if you plan to plead guilty, a lawyer can be helpful.
6. If you want a lawyer 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.
7. 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.
8. **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.