

### SPECIAL INSTRUCTIONS FOR THE 2022-23 MYLAW MOCK TRIAL CASE

1. This is a criminal jury trial set in the Circuit Court for Chesapeake County.
2. Because this is a jury trial, competitors should direct their arguments to the “members of the jury.” No judge should ever instruct students to argue this case as a bench trial.
3. The State has four witnesses available to testify, and the following rules apply to the State only:
  - a. The State **must always** call Detective Jordan Carmichael.
  - b. The State **must call two of the following three witnesses**: Andy Benson, Mason Huang, Dr. Simon Green.
  - c. The State must provide notice before trial about which witnesses the State intends to call. The State must provide such notice twenty-four (24) hours before trial by electronic communication to the Defense team’s designated contact person.
  - d. Under no circumstances may the State call more than three witnesses.
  - e. Under no circumstances may the State call all three witnesses listed in Special Instruction 3b.
  - f. The State may present their three witnesses in any order.
4. The Defense has three witnesses available to testify and must call all three: Ryan Grimes, Carter Rodriguez, and Taylor Casey. The Defense is also free to present their three witnesses in any order.
5. All affidavits and reports including the interview of Ryan Grimes are not exhibits and are not permitted to be entered into evidence.
6. Before the trial begins, each team must provide the other team with their selected call order and the pronouns for each witness who will testify at trial.
7. For the purposes of Maryland Rule of Evidence 5-615, Ryan Grimes may serve as party representative for the Defense. In the event this case is tried in-person, Grimes is permitted, but not required, to be seated at counsel table. All other witnesses must be constructively excluded upon a proper Motion to Constructively Exclude made by either party, and judges shall not entertain any argument to allow any other witnesses besides Ryan Grimes to constructively remain in the courtroom.

*Comment: Under no circumstances should a presiding judge actually force a member of either team to leave the room. Based on this Instruction, witnesses who are constructively sequestered should pretend they were not in the trial before they testify, but they must be allowed to remain physically present in the trial room for the duration of trial.*
8. The State does not have a party representative for the purposes of Rule 5-615.
9. Witnesses must acknowledge authorship of any document that purports to be authored by them and the authenticity of any signature that purports to be theirs. A witness whose affidavit, deposition, or report states that the witness is familiar with a particular document must acknowledge, if asked, that the witness is familiar with that document and that the referenced document is the same version as the corresponding document in the current case.
10. This is a closed universe case packet. The only legal materials that competitors may mention or rely upon are the Maryland Rules of Evidence, Statutes, and Case Law provided in this packet. All participants must acknowledge this if asked by a judge.

11. All parties have waived objections specifically related to the United States Constitution and no party may raise any objections specifically related to the United States Constitution.
12. No witness may refuse to answer any questions and no attorney may instruct a witness not to respond to a question based on the witness's Fifth Amendment right to remain silent.
13. Witnesses should feel free to use distinctive accents, speech patterns, and mannerisms - but these elements must never become material inventions of fact. For example, a witness may not testify using a distinctive accent and then have an attorney argue in closing that a certain statement must not have been said by that witness because the person who heard the statement did not state that they heard the distinctive accent.
14. Exhibit 12 is a small black book that was recovered by the police when they raided the apartment of Andy Benson, Carter Rodriguez, and Shannon Murray. Teams may use the exhibit in one of two ways:
  - a. Teams that wish to create a physical exhibit may do so by purchasing this black notebook (here is the Amazon link). Exhibit 12A is a photograph of the book itself. Exhibits 12B, 12C, 12D and 12E are photographs of pages of the notebook, sized to print at the exact size of the pages of the notebook if printed on 8.5 x 11 paper. If they wish to make a physical exhibit, teams are required to print these pages and tape or glue them as the first four pages of Exhibit 12. Teams may then use the created notebook as Exhibit 12 and may refer to Exhibits 12B, 12C, 12D, and 12E as photographs of the pages of that notebook.
  - b. Teams that do not wish to create a physical exhibit may use Exhibits 12A through 12E as photographs of the black notebook and the pages of that notebook.
  - c. If both teams arrive at trial with a black notebook to use as a physical exhibit, the teams should compare the notebooks and attempt to agree on which notebook should be used. If both notebooks can be used and the teams cannot agree, the teams shall flip a coin. If the coin is heads, the State's notebook will be used. If the coin is tails, the Defense's notebook will be used.
  - d. If one team wishes to use a physical notebook, they are permitted to do so. The team not using a physical exhibit is permitted to use the photographs in Exhibits 12B, 12C, 12D and 12E even if their opponent is using a physical notebook.
  - e. If neither side wishes to use a physical notebook or if this case is tried virtually, Exhibit 12 does not exist, but Exhibits 12A through 12E do exist.
  - f. Teams are not permitted to make **any** modifications to the contents of Exhibit 12. Teams are not permitted to write or draw the contents of Exhibit 12 on the pages of their notebook. Teams must print and affix the notebook pages from Exhibits 12B, 12C, 12D, and 12E to their physical notebook, and all other pages of the notebook must be blank.
  - g. The bookmark tassel on the notebook must be on Page 3, for Exhibit 12D.
15. Teams that wish to admit and play Exhibit 3A during trial may do so using electronic devices such as a phone, an external speaker, or a laptop, provided the device is only used for that specific function and is not used to violate any communication rules. For example, teams using a phone to play the audio must not use the phone at any other point during trial, and must not use the phone to send or receive communication from anyone outside of the trial.

### **STIPULATIONS FOR THE 2022-23 MOCK TRIAL CASE**

1. For the convenience of all parties, all potential exhibits have been pre-labeled and pre-numbered. These numbers should be used for all purposes at trial regardless of which party offers an exhibit or what order exhibits are offered.
2. All parties and witnesses are of at least normal intelligence, and none has or ever has had a mental condition that would impact a person's perception, memory, or ability to respond to questions on cross examination.
3. All notice requirements have been satisfied for all evidence and exhibits in the case packet and no party may object at any time that they did not receive proper notice that the other side intended to use a particular document or piece of evidence.
4. Exhibit 12A is a photo of a small black notebook that was recovered in the manner described by Detective Carmichael in Carmichael's police report. All parties agree that the black notebook shown in the photograph in Exhibit 12A is the same notebook depicted in Exhibits 2C and 2D, and all parties agree that the chain of custody for that notebook has been properly preserved and documented.
5. Exhibits 4 – 9 are screenshots taken from the cellular phone of Andy Benson. The screenshots were taken at 11:32 PM on December 15, 2021, and the screenshots were provided to counsel for both parties. Andy Benson provided these screenshots voluntarily. All parties agree that the content of these text messages, including names and timestamps, are accurate.
6. All names, dates, and times on the text messages in Exhibits 4 – 9 were automatically generated and do not have a declarant for the purposes of Maryland Rule of Evidence 5-801.
7. This is a bifurcated trial. Evidence should be limited to guilt or innocence, and no party should offer evidence that relates solely to sentencing.
8. Exhibit 3 is a transcript of a jail call placed from Chesapeake County Detention Center to the cellular phone belonging to Andy Benson. The call was placed at 1:21 P.M. EST. All parties agree that Exhibit 3 is an accurate transcript of that call, and Exhibit 3A is a true and accurate copy of the audio of that call. All parties agree that Shannon Murray is the voice heard in Exhibit 3A.
9. No party may argue any chain of custody issues in this trial. All parties agree there are no issues as to the chain of custody of the items seized by police during the search of the Blue Ridge Apartments from recovery through submission into evidence, and/or for testing by the Chemist in the Drug Laboratory.
10. Both parties agree that the report from Chemist A. Nobel on December 21, 2021 is authentic, that the presence of Chemist A. Nobel is waived, and the report of Chemist A. Nobel is admissible at trial by either party. Both parties have waived all objections to the admissibility of the Chemist report and agree the contents are accurate.
11. Both parties agree the information contained in Detective Carmichael's report regarding forensic evidence including fingerprints is accurate, and no party may object to Hearsay or Best Evidence because Detective Carmichael is restating information from the Forensics Report.

12. Detective Jordan Carmichael has met the qualifications of 5-702 and is an expert in Police Narcotics Investigation and Identification of Narcotics.
13. As it relates to the December 5, 2021 search of the apartment occupied by Andy Benson, Carter Rodriguez, and Shannon Murray, both parties agree to the existence of a Search Warrant that was signed by a judge from the Circuit Court for Chesapeake County. This warrant authorized the search and seizure of illicit items in Apartment 1A of the Blue Ridge Apartments.
14. Detective Carmichael and Ryan Grimes have reviewed the “Transcript of December 28, 2021 interview of Ryan Grimes” and agree that its contents are an accurate transcription of what was said between these two during that interview. The parties also agree this transcript is an accurate transcription of the interview that took place on that occasion.
15. Both sides have waived any argument that the pills shown in one photo look different from the pills shown in another photo. Either side is free to make the presiding judge aware of this stipulation prior to trial if they choose to do so.

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**STATE OF MARYLAND VS. RYAN GRIMES**

**IN THE CIRCUIT COURT FOR CHESAPEAKE COUNTY**

The Jurors of the State of Maryland, for the body of Chesapeake County, do on their oath present that RYAN GRIMES, on or between October 14, 2021 through December 6, 2021, in Chesapeake County, did conspire with Andy Benson, Carter Rodriguez, and/or Shannon Murray to distribute a controlled dangerous substance of Schedule II, to wit: Amphetamines, in violation of the Common Law of the State of Maryland, against the peace, government, and dignity of the State.

***This Charge Is Classified As A Misdemeanor And Is a Jailable Offense With A Maximum Penalty of Incarceration Up to 5 Years And Fines Of Up To \$15,000.00.***

**SECOND COUNT**

The Jurors of the State of Maryland, for the body of Chesapeake County, do on their oath present that RYAN GRIMES, on or between October 14, 2021 through December 6, 2021, in Chesapeake County, did conspire with Andy Benson, Carter Rodriguez, and/or Shannon Murray to distribute a controlled dangerous substance of Schedule II, to wit: Cocaine, which is a narcotic drug, in violation of the Common Law of the State of Maryland, against the peace, government, and dignity of the State.

***This Charge Is Classified As A Misdemeanor And Is a Jailable Offense With A Maximum Penalty of Incarceration Up to 20 Years And Fines Of Up To \$15,000.00.***

THE GRAND JURY further avers and alleges that the offenses charged hereinabove were against the peace, government, and dignity of the State.

STATE OF MARYLAND

\*

IN THE

v.

\*

CIRCUIT COURT

RYAN GRIMES

\*

FOR CHESAPEAKE COUNTY

\* \* \* \* \*

**ORDER**

Upon consideration of the Defendant’s Motion for Disclosure of the Identification of the Confidential Informant’s Identity, the State’s Response to Motion for Disclosure of the Identification of the Confidential Informant’s Identity, and testimony and arguments made before this Court on October 19, 2022, it is this 19<sup>th</sup> day of October 2022, by the Circuit Court for Chesapeake City, hereby:

**FOUND** that for the reasons stated on the record, the Defendant has not met their burden; and it is therefore

**ORDERED** that Defendant’s Motion for Disclosure of the Identification of the Confidential Informant’s Identity is DENIED.

*Erik Atas*  
\_\_\_\_\_  
Judge Erik S. Atas

STATE OF MARYLAND

\*

IN THE

v.

\*

CIRCUIT COURT

RYAN GRIMES

\*

FOR CHESAPEAKE COUNTY

\* \* \* \* \*

**ORDER**

Upon consideration of the State’s Attorney’s Motion to Exclude the Testimony of Taylor Casey, the Defendant’s Response to Motion to Exclude the Testimony of Taylor Casey, as well as the Defendant’s Motion to Exclude the Testimony of Dr. Simon Green, the State’s Attorney’s Response to Motion to Exclude the Testimony of Dr. Simon Green, a review of the “Expert Report of Dr. Simon Green” and the “Expert Report of Taylor Casey,” and arguments made before this Court on October 19, 2022 for all of the above Motions as it relates to Rule 5-702 and *Rochkind v. Stevenson*, 471 MD 1 (2020), it is this 19<sup>th</sup> day of October 2022, by the Circuit Court for Chesapeake County, hereby:

**FOUND** that, pursuant to Rule 5-702(2), expert testimony in this case in the field of Psychology is appropriate; and it is further

**FOUND** that, pursuant to Rule 5-702(3), a sufficient factual basis exists in this case to support expert testimony from an expert in the field of Psychology; and it is further

**FOUND** that, pursuant to Rule 5-702(2), expert testimony in this case in the fields of Police Conduct and Police Narcotics Investigations is appropriate; and it is further

**FOUND** that, pursuant to Rule 5-702(3), a sufficient factual basis exists in this case to support expert testimony from an expert in the fields of Police Conduct and Police Narcotics Investigations; and it is therefore

**ORDERED** that the State's Attorney's Motion to Exclude the Testimony of Taylor Casey is DENIED; and it is further

**ORDERED** that, pursuant to Rule 5-702(1), the trial court shall determine, through testimony or stipulation of the parties, if Taylor Casey is qualified as an expert in the fields of Police Conduct and Police Narcotics Investigations based on their knowledge, skill, experience, training, or education; and it is further

**ORDERED** that the Defendant's Motion to Exclude the Testimony of Dr. Simon Green is DENIED; and it is further

**ORDERED** that, pursuant to Rule 5-702(1), the trial court shall determine, through testimony or stipulation of the parties, if Dr. Simon Green is qualified as an expert in the field of Psychology based on their knowledge, skill, experience, training, or education.

*Erik Atas*  
\_\_\_\_\_  
Judge Erik S. Atas



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BAR ASSOCIATION &**

**BALTIMORE COUNTY  
BAR FOUNDATION**



**ARE PROUD TO  
SUPPORT MYLAW &  
MOCK TRIAL**



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**410-337-9100**

1 **Affidavit of Andy Benson**

2 Witness for the Prosecution

3  
4 After having been duly sworn by oath, Andy Benson hereby states as follows: I am over 18 and  
5 competent to make this affidavit. I am testifying voluntarily under the terms of my plea agreement with  
6 the State of Maryland.

7  
8 My name is Andy Benson. I'm 21 years old and I was a student at Catoclin College until I was  
9 arrested in December of 2021. I was involved in a drug ring at Catoclin College and I've come clean  
10 about my involvement in that operation. Getting involved in that drug ring was the biggest mistake of my  
11 life, and I regret that decision every day. Since I came clean about my involvement and agreed to  
12 cooperate with the police, I was expelled from Catoclin College.

13  
14 I started at Catoclin in 2018 as a freshman and I had trouble meeting people, so I joined a few  
15 different clubs. I remember finding Humans vs. The Undead and meeting Carter Rodriguez and Shannon  
16 Murray. We were all living in the same building on campus, and we all sat near each other at the info  
17 session. After talking for a few minutes, we decided we would form a team. Our fourth member, Terry,  
18 was a sophomore who joined that year too, but she didn't have anything to do with any of the events in  
19 this case and we never told her anything about what we did.

20  
21 The three of us decided in spring of 2021 that we wanted to live together for our senior year. We  
22 applied for campus housing together and got approved for a three-bedroom suite in one of the campus  
23 apartments. It had three individual bedrooms, a common area with a small kitchen and a living room, and  
24 a shared bathroom. It was just the three of us living there until we all got arrested.

25  
26 After Terry graduated in the spring of 2021, we needed a new member to bring our team back to  
27 four people. We tried a few people, but no one really fit in with the group. After a few weeks, I remember  
28 we played a game against a random team and we all met Ryan Grimes. Ryan was really good at the game,  
29 but more importantly, we all liked Ryan. Ryan was a bit introverted at first, but Ryan really opened up to  
30 us after the game was over. Ryan came to late night dinner with us at the campus dining hall, and by the  
31 end of the night we had invited Ryan to join our team.

32  
33 Of course, I wasn't just teammates with Carter and Shannon. In March of 2021, Carter started  
34 taking Adderall to help Carter focus while studying. I'm pretty sure Carter had a prescription the first time  
35 Carter took it, but soon after Carter started taking Adderall, Carter suggested to Shannon and me that we  
36 should try to sell Adderall on campus. Carter told us that someone named Mason Huang saw Carter  
37 taking Adderall in the library and approached Carter to try and buy some. Carter told us Carter didn't do it  
38 because Carter didn't know how much Adderall should sell for, but Carter wanted to find out and see if it  
39 would be worth it to sell some Adderall for extra spending money.

40  
41 I was definitely hesitant at first. It didn't bother me to sell the Adderall. I just didn't want to deal  
42 with the consequences if we got caught. I knew it was illegal, but I figured if we kept the operation small  
43 and quiet, we'd be fine. Shannon seemed more concerned than I was, from what I could tell. I came  
44 around to the idea pretty quickly after Carter explained it to me, but Shannon told us she didn't want to do  
45 it because she could lose her scholarship. After a few more conversations to explain how the operation  
46 would work, Shannon agreed to help out.

47  
48 The operation was simple. Carter told Shannon and me what Carter had said to their doctor to get  
49 a prescription, and we both went to the same doctor and said the same things. I think my appointment  
50 took about twenty minutes, and I left with a month prescription for Adderall. A few days later, Shannon

51 had one too. We each got a prescription for 30 pills of 10 mg of Adderall, and all we had to do to get  
52 more was go back and get another prescription.  
53

54 We decided it would be easier to keep this quiet if we each had specific roles. Carter was always  
55 the one who held the pills. Carter had a small safe that we kept in the common area, so Carter kept the  
56 pills there except when Carter was doing deliveries. I didn't even know the combination to the safe. My  
57 job was recruitment. Carter introduced me to Mason Huang, the person who first approached Carter about  
58 buying pills, and I started to look for possible customers in the library. I would go around late at night and  
59 look for people who seemed stressed or tired, or who were pulling an all-nighter. Sure enough, a lot of  
60 them were willing to part with \$20 – cash only, of course – to get some help with their work.  
61

62 Shannon's job was to keep everything organized. She kept a small notebook where she would  
63 keep track of everything we were doing. That's the notebook that is labeled Exhibit 12. The plan was  
64 always for Shannon to tear out and burn the pages from that book if we ever suspected we might get  
65 caught. As you might be able to guess from the fact that the notebook was still in Shannon's room when  
66 we were busted, we didn't know we were about to get caught. And yes, I know, we did actually take notes  
67 on a criminal conspiracy.  
68

69 We all realized pretty quickly that we were going to need more pills. On April 4, 2021 we had a  
70 total of 84 pills between the three of us: the 24 left from Carter's first batch, plus 30 each from Shannon  
71 and me. We sold them for \$20 a pill and within a week, they were all gone. We made \$1,680.00 on the  
72 first batch, and we split it evenly across the three of us. (You can see that in Shannon's notebook.) Pretty  
73 soon, all we could talk about was finding a way to make more money. You can see that in some of the  
74 texts we sent, which are in Exhibit 4. We made an agreement never to text about the operation, but I guess  
75 we thought we were being slick with those messages.  
76

77 By early May we had each gotten our next prescription, and just in time - it was finals season. We  
78 raised the price to \$30 a pill and they were still gone within a week. That time we each made \$900, and  
79 we decided to wait until the fall to get another prescription. That gave us the summer to plan for how to  
80 expand our operation. Our main priority was to get more pills and to have a steadier supply so we could  
81 restock faster. But we didn't want to raise suspicions or draw any attention.  
82

83 I decided to go back and talk to Mason Huang again, since Mason was the first one to approach  
84 us about this. Mason told me that before Mason started buying from us, Mason would use some sketchy  
85 website on the dark web to order pills. Mason said Mason wasn't always sure the pills were legitimate,  
86 but most of the time they seemed to work the way Mason needed them to work. Mason wasn't able to tell  
87 me how to find those websites, but it wasn't that difficult to find myself.  
88

89 Once I went home for the summer, I took advantage of no longer having campus wifi and started  
90 to do some searching. I downloaded a VPN (that's a "Virtual Private Network") to keep my browsing  
91 history private, and I started researching online pharmacies where I could buy Adderall. Sure enough, I  
92 found one that would ship directly to my parents' house. I know it was risky to order the pills to my  
93 parents' house, but they never opened my packages so I figured they wouldn't start this time. I worked as  
94 a lifeguard for most of the summer and used a lot of my summer job money to stockpile pills, and I also  
95 used about \$500 of the profits I got from the second batch of sales in May to buy even more. I sent all this  
96 information to Carter, and I'm pretty sure Carter ordered from the same site.  
97

98 We went back to campus in late August, and I remember we all met up on September 1. That was  
99 the first time since July that I had seen Carter and Shannon, and we knew we needed to be ready when  
100 classes started. We had each gotten our legitimate new prescription of 30 pills, so we had those 90 pills.  
101 Carter bought 240 more pills and I bought 330, so that gave us a total of 660 pills. We decided to keep the

102 price at \$30 a pill because a few people had complained that we were increasing prices. We kept our roles  
103 in the operation the same and got to work selling the new pills.  
104

105 Business was booming right from the start of the Fall 2021 semester, and pretty soon we had a  
106 problem. You can see from the texts in Exhibit 5 that we just had too much product to sell. I was starting  
107 to miss classes and could barely keep up with the demand, and there was just not enough time for us to  
108 sell all those pills if I was the only one selling. Shannon still refused to sell anything, but I convinced  
109 Carter to start helping me out. Once both Carter and I were selling the Adderall, we were able to catch up  
110 and sell most of the pills by the end of September.  
111

112 A few weeks into the semester, we got a chance to blow off some steam our favorite way:  
113 Humans vs. The Undead was starting again. Like I mentioned earlier, that's how I met Ryan Grimes. We  
114 would usually play on Monday and Wednesday nights, so I know I met Ryan for the first time on  
115 Monday, September 20, 2021. That was the night we went to late night dinner with Ryan and Ryan  
116 agreed to join our team. We all liked Ryan right away. Ryan was quiet at first, but Ryan really opened up  
117 at dinner and had a great sense of humor. I could tell Ryan was the type of person who would make  
118 friends easily once they came out of their shell at college.  
119

120 In early October, we had restocked our supply of pills and were ready to start selling again. But  
121 Carter wanted to expand our operation. You see, the one major flaw in our plan was that we were selling  
122 mostly to people our age. As juniors, that wasn't too bad; most juniors were trying to get their grades up  
123 for graduate school or job applications, and we believed they would need what we were selling. But in  
124 2021, we were starting to deal with a lack of demand. Some of the people we sold to had senioritis and  
125 just weren't interested in buying. I remember I asked one regular customer and he told me "what you're  
126 selling isn't worth \$30 a pill when I've already got my job and I just need to pass, not get an A. Plus  
127 you're selling lousy product anyways." He wasn't the only one who complained about the quality of our  
128 supply, and a lot of our customers just didn't care as much about their grades.  
129

130 That's when Carter came to me and Shannon and said we needed to get Ryan in on the operation.  
131 We had a long conversation that lasted almost until sunrise. (You can see in Exhibit 6 where Shannon  
132 says she's tired because we were up late talking about Ryan. The zombie emoji is what we used to refer to  
133 Ryan, for what I hope are obvious reasons.) Shannon was vehemently opposed to telling Ryan what we  
134 were doing. She said we couldn't be sure if Ryan wouldn't just turn around and report us; she kept  
135 repeating "we barely know Ryan." Carter was completely on the opposite end and was convinced Ryan  
136 would never rat us out. I remember Carter saying "Ryan barely has any friends. Ryan wouldn't tell a soul  
137 even if Ryan won't help us out." That meant it was up to me to break the tie.  
138

139 I struggled with my decision for a day or two, but ultimately decided we should try to get Ryan to  
140 help us out. Even though Ryan didn't have a ton of friends, Ryan had access to a completely different  
141 customer base and wouldn't look suspicious if Ryan was talking to underclassmen and studying with  
142 freshmen and sophomores in the library. I figured that even if Ryan was mad at us, we could probably  
143 convince Ryan not to say anything about it because Ryan could look guilty by association. I told Carter  
144 and Shannon that I wanted Ryan to be let in, and we decided Carter would be the one to tell Ryan.  
145

146 I wasn't there when Carter talked to Ryan, but Carter told Shannon and me about the  
147 conversation after it was over. I remember Carter told us the conversation happened on October 13, which  
148 I'm pretty sure was a Wednesday. Carter caught us up about Carter's conversation with Ryan later that  
149 night in the library. According to Carter, Ryan said that Ryan wasn't interested. Ryan said they weren't  
150 going to report us or anything like that, but Ryan just wanted to lay low and survive freshman year. I  
151 figured that was the end of it until I talked to Ryan a few days later.

152 A few days after Carter told us about that conversation, I got a text from Ryan. You can see it in  
153 Exhibit 7, and you can see it was on Monday, October 18. Ryan asked me to talk and said it was better if  
154 we didn't have that conversation over text. As you can see there, I suggested to Ryan that we talk later  
155 that night in our apartment. Ryan came over and immediately asked if anyone else was there. I told Ryan  
156 that Carter and Shannon were gone, and Ryan seemed to relax a bit.  
157

158 I remember there was an awkward silence after I asked Ryan what they wanted to talk about, and  
159 then Ryan finally said "You know, the drugs thing." I asked Ryan if they had reconsidered helping us out,  
160 and Ryan said "Yeah, I have. Carter said you make a lot of money, and that you're really careful not to  
161 get caught. If I help you, I need to make sure no one will ever connect me to this." I reassured Ryan that  
162 we had a plan in place, and then I explained to Ryan what we wanted Ryan's role to be.  
163

164 I told Ryan that we really needed to find more people to sell to, because a lot of our regular  
165 buyers were graduating and didn't need our product as much. I explained to Ryan that we needed Ryan to  
166 start talking to younger students, like freshmen and sophomores in Ryan's class, and getting the word out  
167 that we were the people to buy study drugs from. Ryan asked me why we needed to do this, and I told  
168 Ryan it was because we had way more product than we could sell and we needed to move it faster. I  
169 didn't tell Ryan anything about where we got the drugs and I didn't ask Ryan to help us get drugs.  
170

171 Ryan sat quietly for a few minutes and then looked at me and nodded Ryan's head. I asked Ryan  
172 if that was a yes, because I felt it needed it to be out loud, and Ryan said "Yes. I'm in. I'll start talking to  
173 people tomorrow." Ryan got up and left quickly, and I texted the group what you can see in Exhibit 8.  
174 Zombie refers to Ryan, and the little hotel icon is short for "in" (think "inn"). As you can see, Carter and  
175 Shannon were surprised, but pleased to hear the news.  
176

177 The next evening, on Tuesday, October 19, I was walking through campus around 9 PM when I  
178 was stopped by someone walking the other way. The person looked at me closely for a moment and then  
179 said, "I hear you're the person to talk to about some help." I nodded, quoted them a price, and they bought  
180 five pills. I noticed as we were finishing up that they looked young, so I asked what year they were. The  
181 person told me they were a freshman. I asked them where they had gotten my name from, and they said  
182 "What are you, a cop?" and walked away quickly. No one else was around and I don't remember anything  
183 about what the person looked like, but I figured this had to be one of Ryan's first recruits.  
184

185 Over the next few weeks, business started to pick up. You can see it in the logbook. Our profits  
186 went way up in that last week of October. I told Ryan I was going to settle in on the third floor of the  
187 library on Tuesday and Thursday nights, and that Ryan should start telling people to find me there. You  
188 can see on the logbook that the week of October 25, we had our best week in over a month. I sat in the  
189 library on Tuesday, October 26 and Thursday, October 28, and I asked each person who approached me  
190 what class year they were. I didn't keep an official tally, but I would estimate around 80% of them said  
191 they were a freshman or a sophomore. A lot of people wouldn't answer, but that's what I remember from  
192 the people who did answer.  
193

194 It's true that I sold to Mason Huang a few times. Mason is one of those people who always seems  
195 to be around; I'm not convinced they even go to class. Mason bought from me three or four times over the  
196 last two weeks of October and the first two weeks of November. I didn't know Mason at all, but I knew  
197 Mason was the one who had approached Carter when this all started. I also knew Mason and Ryan had a  
198 class together, and Mason told me one time that Mason sits next to Ryan in class. Mason never told me  
199 that Ryan told Mason to come find me there, but I don't know how else Mason would have known.  
200

201 In late October and early November, Ryan was at the apartment a lot. Ryan would come by to  
202 check how much we were trying to sell that day, and Ryan would pick up their cut for the week. We

203 never discussed money or the operation over text, but you can see from Exhibit 9 that we would  
204 coordinate when we could all meet at the apartment. Ryan would usually come and go late at night so less  
205 people would see Ryan around, but obviously there were other people walking around sometimes. Either  
206 way, we tried to keep Ryan's name out of the operation as much as we could.  
207

208 November was a fantastic month for us in terms of profits. It just seemed like our customer base  
209 was growing every week. I asked Carter if they were doing anything differently and they said no, they  
210 were pretty much talking to the same people. Shannon told me the same thing, and even said she barely  
211 talked to anyone aside from the few people she had already recruited. I can't think of any other  
212 explanation besides Ryan for why our business would have grown.  
213

214 I will say that a few days before Ryan joined the operation, one of the underclassmen from  
215 another Humans vs. The Undead team approached me and bought some pills. That had never happened  
216 before, and it seemed like word spread pretty fast because several of our new customers were people who  
217 I had seen playing Humans vs. The Undead before. It's not always easy to tell who is involved because  
218 hundreds of people play it each week and a lot of people come in for just a week or two, so a lot of that  
219 business might have come from word spreading in the Humans vs. The Undead community. But I play  
220 every week and I saw a lot of people I didn't recognize, so I don't think that was the whole reason we got  
221 more business.  
222

223 The first few weeks of November were normal, and I don't remember a lot happening. We were  
224 selling pills at such a high rate that we had started discussing how to get more. But then Carter had a  
225 different idea. I remember a few days before Thanksgiving break, Carter talked to Shannon and me about  
226 possibly expanding into selling cocaine. Carter had apparently met someone who had a connection and  
227 could get us a small amount to start, and we could start to see if there was a market on campus for  
228 something a bit more intense.  
229

230 Shannon was immediately opposed, and I was definitely not thrilled with the idea. I told Carter  
231 they could get a very small amount and we could ask a few of our most regular buyers if they would be  
232 interested. Shannon got really upset and stormed out of the meeting, but I thought she was overreacting. It  
233 was just a small experiment to see if we could make some extra cash. That's why the police found the  
234 cocaine when we got busted; we hadn't even sold it and hadn't even decided if we wanted to sell it. We  
235 were just starting to consider whether selling it was a good idea.  
236

237 Two days after I told Carter they could get a small amount of cocaine, I was walking out of my  
238 apartment building when I was approached by someone I didn't know. The person looked young, and  
239 they had a sticker on a textbook that said "Catocin Class of 2025." The person asked me if I had any  
240 cocaine available to buy. I told them no, but said I might have some soon. I never got a chance to ask  
241 Carter if they talked to Ryan about selling cocaine, but I don't know how else that person would have  
242 found out.  
243

244 We came back from Thanksgiving break on Monday, November 29, and something wasn't right.  
245 Business slowed down almost immediately, and then I found out that Ryan had the flu. Ryan was gone  
246 from campus that entire week, and our profits dropped by over 50%. You can see that in Exhibit 12E  
247 where it lists our income for that week. I can't think of any other reason our profits would have dropped  
248 except for Ryan being gone that week and not recruiting more people to buy from us. It was just a few  
249 weeks before finals, so that should have been when demand was starting to peak.  
250

251 The three of us were home at the apartment around 3 PM on Monday, December 6, when I heard  
252 a knock at the door. We had been working on a small delivery, so we had five Adderall pills in a plastic  
253 bag on the table. I looked through the hole and saw about 15 people in gear marked with the word

254 “POLICE” on it, and my stomach dropped. But I’ve been taught well. I shouted, “Come back with a  
255 warrant” through the door and made sure the door was locked. But then one of the officers shouted  
256 “We’ve got one, so open the door.” I looked over at Carter and Shannon, and they both looked terrified. I  
257 thought Shannon was going to cry, and Carter was pale and had Carter’s head in Carter’s hands. But  
258 Carter picked Carter’s head up and we looked at each other, and I think we both accepted our fate. I  
259 turned the lock, opened the door, and my whole life changed.

260  
261 The police came in and searched the whole place. All three of us were arrested, and we got to  
262 walk through our entryway and to the police car while people crowded around and took photos and  
263 videos. It was the worst moment of my life. The cops broke a bunch of our stuff too; they really tore the  
264 place apart. I’ve looked at the pictures in Exhibit 2A, 2C, and 2D and I agree that’s what the apartment  
265 looked like when we were arrested, although it looks like they collected the pills before they took Exhibit  
266 2D but after they took Exhibit 2C. I also agree that everything in Exhibits 2A through 2D was recovered  
267 from our apartment.

268  
269 I was taken to jail and got to make one phone call, so I called my parents. They already knew and  
270 they were on the way to post bail. That phone call will stick with me for the rest of my life. I was charged  
271 with possession with intent to distribute amphetamines (which is another word for the Adderall) and  
272 cocaine. My attorney told me I could be facing up to twenty five years in prison if I went to trial, and he  
273 seemed to think the State had enough evidence against me to win. A court commissioner held me without  
274 bail, but a judge released me on home detention at the bail review the next day. I was ordered not to have  
275 any contact with Carter or Shannon. I only spent one night in jail, but then I was on house arrest at my  
276 childhood home. Occasionally, I thought it might have been better to just stay in jail.

277  
278 About a week later, I had a meeting with my attorney and a detective. I think their name was  
279 Detective Jordan Carmichael. My attorney had spoken with the State’s Attorney in charge of the case, and  
280 they had an offer for me. The offer was in writing and I read the offer. My lawyer also reviewed the offer  
281 with me. The offer stated that if I cooperated and testified against Carter and Shannon, the State would  
282 recommend that I get something called a “probation before judgment.” My lawyer told me that getting a  
283 PBJ would mean I wouldn’t go to prison, but I would be on probation for a period of time, and I would go  
284 to prison if I violated my probation. I also would not have my case resolved with a PBJ until after I  
285 testified against all co-defendants in this case. My lawyer also told me if I completed my probation  
286 without any violations, I would be eligible to have the whole case expunged in a few years, which is when  
287 the entire case is deleted from your criminal record and the court’s record. I didn’t want to flip on my  
288 friends, but this was a chance for a new life and a fresh start. I was up the entire night thinking about it,  
289 but on Wednesday, December 15, I agreed to cooperate.

290  
291 When I was with Detective Carmichael and someone else, who I think was a prosecutor, to sign  
292 the agreement, I asked them why Ryan wasn’t listed on the agreement. I figured it included Ryan because  
293 it says “...and all other co-conspirators who may have been involved.” I was confused why it had  
294 Shannon and Carter’s names, but not Ryan’s name. Detective Carmichael asked me “Who is Ryan?” I  
295 started to tell the detective about Ryan and how Ryan had been involved in the whole thing too. I asked  
296 Detective Carmichael if they really hadn’t known about Ryan, but the detective just made a face and left  
297 the room. I was confused, but I decided I would just sign the agreement and figure out the rest later.

298  
299 After I signed the agreement, I sat down for an interview with Detective Carmichael and told  
300 them everything I’ve written in this statement. I think that interview was on Tuesday, December 21.  
301 Merry Christmas to me, I guess? I explained all the details of the operation and included Ryan in that  
302 explanation. I did make it clear that Ryan didn’t handle any drugs and was really only involved in helping  
303 to broaden our customer base. I remember a little later, on January 3, 2022, I got a call from Detective

304 Carmichael to tell me they had arrested Ryan. I wanted to text Carter and Shannon, but I wasn't allowed  
305 to have contact with them.

306  
307 Everything was quiet for the next few weeks. Detective Carmichael checked in occasionally to  
308 make sure I was still abiding by the terms of my cooperation agreement. I remember the detective saying  
309 something like, "we need you to be a great witness, so stay clean and you'll get past all of this." I was  
310 determined to follow Detective Carmichael's advice, but unfortunately, my former friends weren't  
311 following the same path.

312  
313 On January 18, 2022 (I think it was a Tuesday) I was sitting in my room reading when I got a call  
314 on the house phone from an unknown number. It was the middle of the day and my parents were at work,  
315 so I went ahead and answered it. I don't think I would have answered it normally, but I wasn't having a  
316 lot of human contact and I figured at least I'd get to talk to someone.

317  
318 When I picked up the phone, I heard, "This call is from a person currently in prison in Maryland's  
319 Chesapeake County Detention Center. All calls are logged and recorded and may be listened to by a  
320 member of prison staff and other authorities. If you do not wish to accept this call, please hang up now." I  
321 thought it was a prank, but then I heard Shannon's voice on the other end. I knew it was her immediately;  
322 I recognized her voice even with the lousy quality of the call. I've listened to the audio in Exhibit 3A, and  
323 it's accurate. I also agree that Exhibit 3 is an accurate transcript of the call.

324  
325 I didn't say anything the entire time, but Shannon must have heard me breathing like you can hear  
326 me on the recording. Shannon started talking and I listened for about 30 seconds. It was obvious right  
327 away that Shannon was angry with me for cooperating, that's what she means by, "I hope you've gotten  
328 plenty of cheese." I took that to mean Shannon was calling me a rat. And when she says "I heard they got  
329 Zombie too," she's referring to Ryan. Like I said earlier, that was our nickname for Ryan. The rest of the  
330 message speaks for itself, and I'm not even going to try and guess what Shannon was talking about. After  
331 about 30 seconds, Shannon stopped talking, and a few seconds later she hung up. I never said a word to  
332 her.

333  
334 After I processed that the call had actually happened, I called Detective Carmichael and told the  
335 detective about it. Detective Carmichael thanked me and told me Detective Carmichael would pull the  
336 tapes, because every jail call is recorded. Sure enough, a few weeks later the detective stopped by my  
337 house and played Exhibit 3A for me, to confirm that's the call I mentioned. Exhibit 3 is an accurate  
338 transcript of that call.

339  
340 In April of 2022, I testified at Carter Rodriguez's trial. Everything I've said in this affidavit is  
341 consistent with what I said at that trial. I still have no idea why Carter went to trial, but Carter lost and I  
342 heard Carter is going to end up going to prison for a long time. Detective Carmichael was in the  
343 courtroom for all of my testimony in that case, and Detective Carmichael told me afterwards that the State  
344 is watching my testimony very closely to make sure I cooperate fully. Detective Carmichael told me,  
345 "once we've got the other three behind bars for good, we'll get that bracelet off your ankle." I have every  
346 intention of doing whatever I can to make sure the State believes me so I never have to go to prison.

347  
348 I am familiar with the following exhibits: Exhibits 2A – 2F, Exhibit 3 and 3A, Exhibits 4-9,  
349 Exhibit 12 and 12A-12E.

350  
351 I swear or affirm that everything in this affidavit is true. Before I wrote this affidavit, I was  
352 instructed that I should include everything I know that could possibly be relevant to my testimony in this  
353 case, and I carefully followed those instructions. I am fully aware that I must update this affidavit with



354 any new or additional information I remember from now until the moment I take the stand to testify at  
355 trial.

356

357 *Andy Benson*

358 Andy Benson

1 **Affidavit of Mason Huang**

2 Witness for the Prosecution

3  
4 After having been duly sworn by oath, Mason Huang hereby states as follows: I am over 18 and  
5 competent to make this affidavit. I am testifying voluntarily and have not been subpoenaed.

6  
7 My name is Mason Huang. I'm 21 years old and I'm now a senior at Catoctin College. All of the  
8 events you're asking about happened during my sophomore and junior years. I'm double majoring in  
9 computer science and engineering, and eventually I'm hoping to go to graduate school. I wasn't involved  
10 in what the students selling drugs were doing, but I'm here to tell the truth about what I know.

11  
12 I was in my sophomore year at Catoctin when I started to take Adderall. I didn't have a  
13 prescription for it, but I probably should have asked for one. I tried it for the first time from a friend who  
14 did have a prescription, and it really helped me stay focused and awake while finishing a paper. I didn't  
15 take it all the time, but I would try to find some when I had a major deadline coming up or I needed to  
16 pull an all-nighter. I was afraid my parents might find out if I tried to get a prescription, since I'm still on  
17 their health insurance. I didn't think they would approve of me taking Adderall, so I didn't tell them.

18  
19 In March of 2021, I had a huge project due for a computer science course and I really needed to  
20 focus for a night or two. No one I knew had Adderall and I had no idea how to get some on campus, so I  
21 went to the library and tried to focus without it. I found a quiet spot and was starting to work on my  
22 project when I saw someone from my class sit down near me. I remembered their name was Carter  
23 Rodriguez. I didn't know Carter very well, but we sat next to each other in class and had always been on  
24 friendly terms.

25  
26 I didn't think much of seeing Carter until I saw Carter reach into Carter's bag and pull out a pill  
27 bottle. I wasn't sure, but I thought I saw Carter pull a pill out that looked like an Adderall pill and take it.  
28 I figured it couldn't hurt to ask and Carter seemed cool, so I approached Carter and asked if they were  
29 taking Adderall, and if so, if they would sell two pills to me. Carter said they only had a few left and  
30 needed them for the next few days, so they didn't sell me any. I ended up doing okay on that project, but  
31 it was definitely a long night of studying until sunrise.

32  
33 I saw Carter a few times in class after that, but we didn't really talk. I also saw Carter around  
34 campus with two people who I now know were Andy Benson and Shannon Murray. A couple of weeks  
35 after I approached Carter in the library, Carter tapped me on the shoulder as we were leaving class. Carter  
36 asked if we could talk for a minute, so we went into an empty classroom. Carter told me that after I  
37 approached Carter, Carter and Carter's friends had been doing some thinking, and they wanted to start  
38 selling Adderall. Carter asked me if Carter could introduce me to Andy Benson, who Carter said would be  
39 handling a lot of the effort to find buyers.

40  
41 I figured this was my chance to solidify my access to Adderall whenever I needed it, so I said yes.  
42 I told Carter I would be happy to meet Andy and happy to help out, as long as I got a 50% discount  
43 whenever I needed to buy for myself. Carter agreed to that right away, and the next day Carter waved me  
44 down in the dining hall and introduced me to Andy Benson.

45  
46 Andy told me that Andy and Carter were selling Adderall pills for \$20 a pill and they needed to  
47 quietly start spreading the word. Andy gave me a cell phone number I could give to people if they wanted  
48 to arrange a place to meet Andy. That number was 667-210-2250, and Andy told me that people should  
49 text Andy to arrange a sale if they needed any pills. I started to tell some friends of mine, and pretty soon  
50 word spread around to a lot of the people I know.

51 As far as I could tell, the operation in spring of 2021 was small. I would see Andy on campus  
52 occasionally, and most of the time Andy didn't seem to be meeting with anyone. But whenever I'd see  
53 Carter in class, Carter would nod Carter's head toward me and occasionally slip me \$50 or \$100 in cash. I  
54 assumed that was to keep me happy, and it was more than enough. I certainly never would have told  
55 anyone about the operation, but I kept telling my friends that if they needed study drugs, Andy and Carter  
56 were the people to ask.

57  
58 I only met Shannon Murray once. Shannon was walking with Andy on campus one day when I  
59 saw Andy and walked up to them. Andy introduced me to Shannon, and then Andy smiled and said to  
60 Shannon, "Mason works in public relations, if you know what I mean." Shannon looked at me and  
61 immediately turned around and walked away. That was the only time I ever interacted with her, although  
62 I would see her around campus every so often.

63  
64 I didn't have much contact with Andy or Carter until the beginning of May. Andy approached me  
65 on campus one day and asked to talk. When we were alone, Andy told me that Andy was running out of  
66 supply and Andy needed to find a way to get more Adderall pills. Andy also said that Andy figured I  
67 might be the right person to talk to about this since I was the one who gave them the whole idea. Andy  
68 told me that Andy and Carter were doing a ton of business, and they needed to find a way to get a more  
69 reliable supply that didn't rely on prescriptions.

70  
71 I have to admit here that I lied to Andy about how to get more pills. I told Andy that I used to  
72 order pills off the dark web before I started buying from them. I had never ordered pills off the dark web  
73 before; I only knew how to access the dark web because of a project I had to do for one of my classes. But  
74 I knew how to access it and I had seen Adderall advertised for sale on some of the sites I visited for my  
75 project, so I figured Andy would believe me - and I was right. Andy thanked me for the information and  
76 the next time I saw Andy, Andy told me they had started ordering pills off a site on the dark web to  
77 increase their supply.

78  
79 When I came back for my junior year at Catocin, I figured I would pick right back up where I  
80 left off. I saw Carter on campus the first week of classes and went up to Carter to shake Carter's hand and  
81 make sure our arrangement was still the same. But Carter wouldn't even look me in the eye. I tried to talk  
82 to Carter, but Carter told me Carter was busy and just walked away. We didn't have class together  
83 anymore so I never got a chance to talk to Carter again about the operation. I tried to find Andy on  
84 campus and talk to Andy, but every time I saw Andy they were walking with someone. I wasn't going to  
85 approach them and try to talk to them about this in front of someone else.

86  
87 After Carter and Andy started to give me the silent treatment, I decided I was going to try to  
88 watch them closely to see if I could figure out what had changed. It turns out that was an easy task; my  
89 apartment building was right next to theirs, and my window looked out at the front entrance to their  
90 building. I was able to see them go in and out whenever they left, and I started to turn the lights out at  
91 night and see if I could spot any of them coming and going at odd hours. I have a single unit, so there was  
92 no one else with me while I was watching.

93  
94 A few weeks after the Fall 2021 semester started, I began to see a new person around. I would see  
95 Andy and Carter going in and out at all hours of the day and night, and sometimes I would see Shannon  
96 with them. I knew the three of them lived together in that building because Andy told me before summer  
97 that they had been approved for an on-campus apartment together. But I started seeing a fourth person  
98 with them a lot, and I didn't know who that person was.

99  
100 I ended up standing in line behind them for food a few days after I first saw them on campus, and  
101 the student told me their name was Ryan Grimes. Ryan told me Ryan was a freshman who had just started

102 at Catoctin, and Ryan said they didn't know very many people and were looking to make friends and find  
103 a community on campus. I don't remember the exact date I had this conversation, but I know it was in  
104 early September, probably around September 8 or 9, 2021.

105  
106 Right around the same time I saw Ryan start to show up with Carter and Andy, I noticed a few  
107 changes around campus. Ryan would come and go at really strange hours of the night, sometimes two or  
108 three times between midnight and 4 AM. Sometimes Ryan was alone, but a lot of the time Ryan would be  
109 walking with Carter or Andy. And I would almost always see Ryan carrying things. Sometimes I'd see  
110 Ryan carrying a stack of envelopes, or a few tote bags, or some small boxes. I have no idea what Ryan  
111 was carrying, but I felt like I was starting to notice a pattern emerging. A few times a week, Ryan would  
112 come in with Carter or Andy, stay for 30-45 minutes, and then leave. This almost always happened  
113 between midnight and 4 AM, and all of these observations were during the months of September and  
114 October. I don't know if Ryan came around at other times of the day though, as I wasn't home very much  
115 during the day.

116  
117 In mid-October, I started to see things change even more. It seemed like all of a sudden I was  
118 seeing Carter and Andy on campus everywhere. If I went to the gym (which to be fair, didn't happen very  
119 often) I would see Carter there. If I went to eat dinner, I'd spot Andy. But they were never by themselves.  
120 Andy and Carter were always talking to someone new, and a few times I know I saw them exchange some  
121 sort of package for cash. Andy and Carter were being discrete, but it wasn't that hard to figure out what  
122 they were doing: they were selling drugs.

123  
124 I also noticed that Andy and Carter seemed to have a completely new client base. As a junior, I  
125 was a TA for a freshmen section of Introduction to Computing Technology, and I recognized several of  
126 my students as people who were meeting with Andy or Carter. And then one day in late October, I think  
127 around October 22 or 23, I saw two of my freshmen students walking with Ryan Grimes. I wasn't able to  
128 hear what they were saying, but later that day I saw both students talking to Andy in the hallway. I'm  
129 pretty sure I saw one of the students hand Andy something in a plain white envelope. Andy shook the  
130 student's hand and all three of them walked away.

131  
132 A few days later, I was working as a TA in that Introduction to Computing class when I  
133 overheard those two students talking to each other. I don't remember their names exactly, but I think they  
134 were Shea and Laura. One of them said to the other, "I'm going to get more pills from Andy later today, I  
135 need to finish this paper tonight." The other responded, "Are you sure that's a good idea? How do you  
136 even know where that stuff comes from?" The first one said, "I got an A on my last paper after using what  
137 Andy gave me. And besides, it comes highly recommended." That was all I could eavesdrop from the  
138 conversation before someone else came up to ask for an extension on their next assignment.

139  
140 Throughout the end of October and the beginning of November, I kept seeing Andy and Carter  
141 meeting with students I knew to be freshmen and sophomores. Some of them were in the class where I  
142 was a Teaching Assistant, and others I had seen coming out of freshmen seminars. And some of them you  
143 could just tell. Younger students don't walk around campus with as much confidence, and they certainly  
144 don't buy drugs with much confidence either. I have no idea how much money Andy and Carter were  
145 making, but it must have been a lot. I'm not sure I ever saw them with textbooks or school supplies; they  
146 pretty much always seemed to be meeting with other students.

147  
148 And I kept seeing Ryan around too. When I first met Ryan in line for food, I didn't get the  
149 impression that Ryan was especially social. Even when I said hi, Ryan didn't really look me in the eye,  
150 and I didn't really see Ryan talking to anyone else during the first few weeks of class. But in late October,  
151 it felt like I couldn't go anywhere without seeing Ryan around. Ryan was talking to people, shaking their  
152 hands, and sometimes I would see a person with Ryan take their phone out and type something in it. I

153 have no idea what they were doing, but it looked to me like they were saving a number that Ryan was  
154 giving them. I did overhear the very end of one conversation, where Ryan had just shook someone's hand  
155 and was walking away. I walked by as Ryan said, "... and there's no better way to focus for those late-  
156 night papers."

157  
158 Throughout November, I would see Ryan come and go from Carter, Andy, and Shannon's  
159 apartment almost every night. I didn't see Ryan go there during the day, although to be fair, I was rarely  
160 in my dorm room during the day because I was in class. But if I came back during the day, sometimes I'd  
161 sit and look for Ryan for a few minutes and I never saw Ryan go into or leave the building with that  
162 apartment. But at night, sometimes Ryan would come by more than once. And every time, Ryan always  
163 had some sort of bag with them. It was usually a backpack, which I guess isn't exactly suspicious as a  
164 college student. But sometimes it was a different kind of bag. And the frequency of visits had definitely  
165 increased as well.

166  
167 Right before Thanksgiving break, I was in the library when I saw Carter turn a corner and walk in  
168 my direction. I don't think Carter knew I was there, because Carter almost walked past me before I got up  
169 and stood in Carter's way. I still hadn't spoken to Carter that semester since Carter and Andy started to  
170 ignore me, and I was determined to at least get a word out of them. Surprisingly, Carter seemed happy to  
171 see me; Carter's face lit up and Carter shook my hand while smiling and said, "Mason! It's been too long.  
172 How are you?" I responded that Carter seemed to be in a good mood, and Carter looked around, lowered  
173 Carter's voice, and said "Yeah, that's what boatloads of cash will do for you." Carter told me Carter  
174 appreciated my role in getting their whole operation started, and Carter handed me a small roll of money.

175  
176 I was surprised Carter was this happy to see me, so I decided to press my luck. I said to Carter  
177 "You guys really seem to be all over the place on campus. Is it still just the three of you involved?" Carter  
178 lowered Carter's voice even more so I had to strain to hear Carter, and Carter said "Nah, we got ourselves  
179 another helper. Someone to help us catch the younger crowd." I laughed and said "Yeah, I know. It's  
180 Ryan Grimes, right?" Carter's face looked shocked; Carter's eyebrows shot up, and Carter's eyes got  
181 wider. But then Carter laughed. "Grimes? No, no. Definitely not; Grimes is too focused on Humans vs.  
182 The Undead to help us out." Carter walked out of sight into the bookshelves, but Carter must not have  
183 gone far. A moment later, I heard a very quiet, muffled voice that I think was Carter saying, "Hey Siri,  
184 text the gang. Meet tonight to discuss Zombie. New album selling maybe too well." I had no clue what  
185 that meant.

186  
187 I went home for Thanksgiving and came back to campus ready to study for finals, but I had a  
188 major project due in early December and I decided to find some Adderall to help me focus. I was going to  
189 look for Andy or Carter, but the Monday after Thanksgiving I actually saw Ryan sitting alone on a bench  
190 outside of the Chemistry building. I decided to take a spur of the moment chance to test my theory, so I  
191 went and walked over in Ryan's direction.

192  
193 As I was walking over, someone came up to talk to Ryan. I stopped and pulled out my phone to  
194 try and act like I wasn't listening, but I was. I didn't know who the person was, but I heard them ask Ryan  
195 if Ryan had anything interesting to talk about? Ryan said "The stuff we always talk about is boring, but I  
196 heard we might have something new to talk about soon." The person asked "how soon?" I heard Ryan  
197 respond "A few days. But this isn't going to help you study." The two of them shook hands and then the  
198 person walked away.

199  
200 Once the person left, I went up and I said hi to Ryan and re-introduced myself, and then I got  
201 right to the point. I said "Ryan, I think you know where to get me Adderall. Can you help me out?" Ryan  
202 stopped, stared at me for about 15 seconds, and then said "What did you say your name was again?"  
203 Ryan's hands were clenched, and Ryan seemed to be looking anywhere except at me. I said my name was

204 Mason, and Ryan finally looked me in the eye and said “Mason, I strongly suggest you leave me alone.”  
205 Then Ryan got up and walked away. I never got a chance to ask what Ryan meant by “new stuff” when he  
206 was talking to that other person.

207  
208 The next Monday, December 6, I was home after class around 3 PM when I heard sirens and  
209 commotion outside of my window. I looked outside and saw several police cars and some unmarked cars,  
210 and what looked like 10 or 15 police officers standing outside of the building where Carter, Andy, and  
211 Shannon lived. A few minutes later, I saw someone I recognized as the University President walk up and  
212 talk to one of the officers. Soon after that, I saw officers walk Carter, Andy, and Shannon out. They were  
213 each in handcuffs, and they got taken to three different police cars. They each drove off, and I remember  
214 hearing on the news later that they were arrested for selling drugs.

215  
216 Of course I was a little nervous because I played a small part in that operation when it first  
217 started, but I figured I was in the clear after no one from the police contacted me that week. But early the  
218 next week, the week of December 13, I was sitting in my room when I heard a knock at the door. I opened  
219 it and was shocked to see Ryan Grimes standing there. I have no idea how Ryan even knew where I lived,  
220 but I asked Ryan if Ryan wanted to come inside. Ryan said no and that Ryan could only stay for a minute.  
221 Ryan looked like Ryan had been crying; their eyes were bloodshot and they had bags under their eyes.

222  
223 Ryan looked at me and said “Mason, you know my friends got arrested, right?” I nodded and said  
224 yes, I heard about that. Ryan then oddly raised Ryan’s voice, talking louder than normal, and said, “I was  
225 so shocked to learn everything they were doing. All I wanted to do was play Humans vs. The Undead, and  
226 I would have never been involved in any drug ring.” Then Ryan lowered his voice and looked at me, and  
227 said “You understand what I mean?” I nodded, and Ryan walked away quickly.

228  
229 I didn’t know what to make of that exchange, but I had a final to study for, so I put it out of my  
230 mind. I took my last final later that week and moved back home that weekend for winter break. A few  
231 weeks later, I heard from another friend that Ryan Grimes had been arrested.

232  
233 Look, I don’t know if Ryan Grimes was involved in selling Adderall. I never saw Ryan handle  
234 drugs or sell drugs, and I never even heard Ryan mention Adderall. But to me, it looked like Carter and  
235 Andy’s operation picked up steam as soon as Ryan showed up, and I never saw anyone else coming and  
236 going from Carter, Andy, and Shannon’s apartment building nearly as much as Ryan did.

237  
238 In mid-January I got a call from someone named Detective Jordan Carmichael. Detective  
239 Carmichael asked me if I knew anything about the drug ring that had been running on campus. I told  
240 Detective Carmichael everything I’ve written in this affidavit. Detective Carmichael seemed especially  
241 interested in the parts about Ryan, though. At the end of the call, Detective Carmichael told me “You’ve  
242 been very helpful. Thank you. I don’t really know what to believe about Grimes, and sometimes I’m  
243 worried that Andy is throwing Grimes under the bus for a better deal. But your story makes a lot of  
244 sense.” That was the end of the call, and it was the last time I ever spoke to Detective Carmichael.  
245 Detective Carmichael never contacted me again, and I wasn’t called to testify at Carter’s trial.

246  
247 I am not familiar with any of the exhibits in this case.

248  
249 I swear or affirm that everything in this affidavit is true. Before I wrote this affidavit I was  
250 instructed that I should include everything I know that could possibly be relevant to my testimony in this  
251 case, and I carefully followed those instructions. I am fully aware that I must update this affidavit with  
252 any new or additional information I remember from now until the moment I take the stand to testify at  
253 trial.

254 Mason Huang

255 Mason Huang

1 **Report of Detective Jordan Carmichael**

2 Witness for the Prosecution

3  
4 Case #: MLW202223  
5 Incident: Narcotics Trafficking  
6 Submitted by: Jordan Carmichael, Detective  
7

8 **Training and Experience**

9  
10 I am Detective Jordan Carmichael and I work for the Chesapeake County Police Department. I have been  
11 a Detective with the Chesapeake County Police Department from July of 2016 to present. I am currently  
12 assigned to the Special Investigations Division in the Narcotics Unit. Before joining the Unit, I was a  
13 Patrol Officer from August 2014 to July 2016.  
14

15 I have completed a considerable amount of training in my time with the Police. In addition to my on-the-  
16 job training from fellow officers, I have the following relevant training:

- 17 • January to July 2014, Chesapeake County Police Training Academy, including 40 hours of
- 18 training in the identification of controlled dangerous substances and drug investigations.
- 19 • July 2015, eight (8) hour course, Search Warrants
- 20 • August 2015, eight (8) hour course, Basic Narcotic and Undercover Investigations
- 21 • March 2016, sixteen (16) hour course, Criminal Street Gangs Strategic Operations
- 22 • February 2018, twenty-four (24) hour course, Interview and Interrogation
- 23 • October 2019, eight (8) hour course, Instructor, Drug ID / Complete Traffic Stops
- 24 • November 2019, eight (8) hour course, Pharmaceutical Investigations
- 25 • November 2020, sixteen (16) hour course, Complete Traffic Stops and Hidden Compartment
- 26 • June 2021, two (2) hour webinar, Fentanyl Dangers to Law Enforcement
- 27 • August 2021, Eight (8) hour course, CNOA, Fentanyl Safety, Investigation and Decontamination
- 28

29 Over the years, I've worked approximately 500 drug investigations and arrests, including as a Plain  
30 Clothes Officer targeting drug investigations. I've obtained or assisted in approximately 100 narcotic  
31 related search warrants, and have worked on dozens of investigations involving trafficking, importation,  
32 and distribution.  
33

34 **Investigation**

- 35  
36 1. On Thursday, October 14, 2021, my office received an anonymous tip regarding a possible  
37 narcotics ring at Catoctin College in Chesapeake County. The tipster indicated that they were a  
38 student at Catoctin who had been approached by a student named Andy Benson. Benson  
39 allegedly attempted to sell the tipster Adderall and indicated they could provide additional pills  
40 for the tipster's friends as well.  
41
- 42 2. Catoctin College does not have its own police force, but Chesapeake County does have officers  
43 detailed to that campus. The same day I received the tip, I contacted Officers Walker and  
44 Lawrence and passed along the tip. I asked them to identify Andy Benson and monitor their  
45 movements on campus for the next several days.  
46
- 47 3. Approximately five days after the initial tip, Officers Walker and Lawrence confirmed they had  
48 identified Andy Benson and set up initial visual surveillance. I stepped in at this stage and  
49 conducted several different surveillance sessions over the next 2.5 months.



- 50 4. On Monday, October 25, I conducted my first evening of surveillance. I took an unmarked  
51 vehicle and parked it in a service location with a clear view of the entrance to Blue Ridge  
52 Apartments, which is the student housing complex where Officers Walker and Lawrence  
53 indicated Andy Benson lived. I could clearly see Apartment 1A of that building, which was later  
54 confirmed to be Andy Benson's apartment, along with Carter Rodriguez and Shannon Murray. I  
55 was dressed in plain clothes. I had two photographs of Andy Benson from their public Facebook  
56 account, as well as a description of Benson based on surveillance from Officers Walker and  
57 Lawrence.  
58
- 59 5. I spotted a person I believed to be Benson leaving the apartment building at approximately 11:52  
60 PM, and I exited my vehicle to trail them. Given that it was late at night, there was very limited  
61 foot traffic and I kept a substantial distance to maintain my cover.  
62
- 63 6. I observed the student I believed to be Benson walk behind one of the academic buildings and  
64 meet another person. The person and Benson spoke for a few moments, and then engaged in  
65 behavior that I recognized as consistent with the exchange of illicit material such as drugs. The  
66 person handed Benson something, and Benson handed the person something in return. The two  
67 went opposite ways without saying another word. Based on my experience, I believe I witnessed  
68 a drug deal.  
69
- 70 7. For the remainder of the week of October 25, I conducted approximately eight hours of  
71 surveillance in the same location, monitoring Benson and any other individuals I saw interact  
72 with Benson. I noticed two individuals with Benson more often than anyone else; those were the  
73 two people I eventually identified as Carter Rodriguez and Shannon Murray. I rarely saw Benson  
74 without either Rodriguez, Murray, or both. From what I could tell, the three individuals appeared  
75 to spend a significant amount of time together.  
76
- 77 8. The following week, on November 3, 2021, I spotted Benson, Rodriguez, and Murray returning  
78 to their apartment building, but they had a fourth person with them. That person was someone I  
79 later identified as Ryan Grimes. I did not witness any suspicious activity for any of those four  
80 individuals when I first saw them together, but I did begin to see Grimes with the other three  
81 more often. On at least five different occasions over the week of November 8, 2021, I saw Grimes  
82 enter or leave Apartment 1A of the Blue Ridge Apartments with Benson or Rodriguez, typically  
83 between 11:00 PM and 3:00 AM.  
84
- 85 9. Ultimately, I knew I needed more evidence to determine if any of the four individuals were  
86 involved in narcotics trafficking. Contrary to certain popular films, I can't go undercover as a  
87 college student, so I needed to find an informant who could. I started looking for a potential  
88 fringe character, possibly someone who knew Benson, Rodriguez, or Murray - I was not focused  
89 on Grimes as a suspect at this time - when the perfect opportunity presented itself.  
90
- 91 10. I received a message through our anonymous tip line on November 10, 2021, from the same  
92 individual who had placed the original tip. The individual did not disguise their voice and I  
93 recognized their voice from the first call. They asked why I hadn't acted yet, and I told them I had  
94 been conducting surveillance but needed more evidence before I could make any arrests. I asked  
95 the person to meet with me and promised them full anonymity in exchange for their assistance.  
96
- 97 11. I met with this individual the next day, November 11. I cannot reveal where I met with them or  
98 what we discussed, except that I promised them full anonymity in exchange for their assistance in  
99 gathering evidence about Benson, Rodriguez, and Murray, and I know the court has ruled that this  
100 person is allowed to remain anonymous. The person was a current student at Catactin College at

101 the time these events took place. I cannot say whether they remain enrolled at Catoctin. The  
102 student was familiar with those three individuals I just mentioned, but I cannot elaborate on the  
103 relationship or lack thereof between any of the parties.  
104

105 12. Approximately two weeks after I met with the confidential informant, we met again in the same  
106 location. I had not conducted any additional surveillance since our first meeting. The confidential  
107 informant told me that Benson, Rodriguez, and Murray were selling Adderall pills to students on  
108 campus. To corroborate this evidence, the informant showed me a picture of an Adderall pill  
109 sitting on what they claimed was a table in the library. I don't have a copy of that photo. The  
110 informant told me that photo was taken immediately after the informant had purchased Adderall  
111 from Benson, after being told by Rodriguez to speak to Benson about buying Adderall.  
112

113 13. The informant did not have the Adderall pill in the photo. They claimed to have dropped the pill  
114 accidentally. I suspected they likely took the pill themselves, but the informant's conduct was not  
115 my concern. I decided to increase my surveillance to try and gather sufficient evidence to make  
116 an arrest.  
117

118 14. During the week of November 29, 2021, I prioritized this case and spent approximately four  
119 hours each evening at Catoctin. I dressed in plain clothes and exited my unmarked vehicle on  
120 occasion to follow Benson and Rodriguez. Throughout the week, I observed behavior that  
121 suggested to me that Benson and Rodriguez were engaged in narcotics trafficking. At least ten  
122 different times, I saw Benson get stopped by another person. The two would have a brief  
123 conversation, exchange in a "hand to hand" of currency for small items consistent in the size and  
124 shape of narcotics, and proceed without any additional conversation. I also witnessed Rodriguez  
125 have interactions like this two times during that week. I did not see Murray with Benson or  
126 Rodriguez for that entire week, although I did witness Murray coming and going from the Blue  
127 Ridge Apartments building a few times.  
128

129 15. I did not see Ryan Grimes with Benson, Rodriguez, or Murray at any point during the week of  
130 November 29, 2021. I later learned during my interview with Grimes that Grimes caught the flu  
131 over Thanksgiving Break and did not return to campus until the following Monday, December 6.  
132

133 16. On Sunday, December 5, 2021, I met with the lead detective in the Narcotics Division, Detective  
134 Daniel Baruch, along with two other detectives in our unit: Detectives McNulty and Moreland. I  
135 presented my case to them, mentioning the suspicious behavior from Benson, Rodriguez, and  
136 Murray, as well as the information from the confidential informant. I did mention that Ryan  
137 Grimes was a fourth person I had seen with those three names I just mentioned, but I made it  
138 clear that I had not seen Grimes engage in anything I would consider to be suspicious behavior  
139 and I did not consider Grimes a suspect. After discussing the case with my colleagues for  
140 approximately 30 minutes, I determined I had probable cause for the arrest of Benson, Rodriguez,  
141 and Murray.  
142

143 17. I drafted a search and seizure warrant for Benson, Rodriguez, and Murray, and the warrant was  
144 approved in the early morning of Monday, December 6, 2021. I assembled a team and we went to  
145 Catoctin's campus around 1:00 PM. The team waited offsite while I returned to my normal  
146 surveillance position. My previous observations suggested there was a strong possibility that all  
147 three individuals would be home that afternoon. I saw Benson and Murray enter the Blue Ridge  
148 Apartments building around 2:00 PM, and Rodriguez entered the same around 2:25 PM. I  
149 immediately radioed to my team, and we were in position by 2:45 PM. We knocked on the door  
150 to the suspects' apartment at 3:02 PM and made entry after one of the suspects (I'm not certain  
151 which one) opened the door and allowed us inside.

- 152 18. Upon entry, we gathered Benson, Rodriguez, and Murray together and had them sit in the  
153 dining/common area while we conducted our search of the residence.  
154
- 155 19. I then immediately took steps to secure the scene. After the initial interaction made it clear there  
156 was no threat of danger, I only allowed two officers to enter the apartment. In our initial search of  
157 the apartment, we saw a small plastic bag containing five pills sitting in plain view on the dining  
158 table. Based on this and the other evidence we had before the search, we arrested Murray,  
159 Rodriguez, and Benson, and escorted them outside to a waiting transport vehicle. I personally  
160 managed the continuing search efforts of the apartment.  
161
- 162 20. The photographs taken in Exhibits 2A, 2C and 2D were taken by me within five minutes of  
163 entering the apartment. We took the small black book on the table (visible in Exhibit 2A) as  
164 evidence and immediately sent it to the lab for testing. We did not dust the entire apartment for  
165 fingerprints because it was a place where the suspects lived; such tests are unlikely to turn up  
166 usable evidence. (For example, it is not useful to test the handle of a microwave for fingerprints  
167 in a place where multiple people live, as it is not likely to tell us anything we do not already  
168 know.)  
169
- 170 21. The photograph taken in Exhibit 2B was taken approximately two hours after entering the  
171 apartment. We carefully moved the safe back to our laboratory, making sure to keep the safe level  
172 and stable so the contents did not shift during the trip. Once we were able to open the safe, we  
173 used our photo box to take that photo before submitting the items in the photo for testing. Our  
174 laboratory technicians also confirmed to us that the credit card function of the safe was not  
175 operational, and it could only be opened using the combination.  
176
- 177 22. The photograph in Exhibit 2D was taken after we collected the safe and the bag of pills on the  
178 table, but before we removed the black book. That is why only some of the same items from  
179 Exhibit 2C and 2A are visible in Exhibit 2D.
- 180 23. I cannot say whether Grimes' fingerprints or other forensic traces could have been present in the  
181 apartment aside from the areas I specifically note in this report.  
182
- 183 24. We collected the following pieces of evidence to submit to the lab for testing:  
184
- 185 a. A small black notebook, pictured on the table in Exhibit 2C and shown in Exhibits 12 and  
186 12A-12E.
  - 187 b. A small plastic bag containing five white round pills, found on the table as shown in  
188 Exhibit 2C;
  - 189 c. Four rolls of cash and one stack of cash found in Carter Rodriguez's room, totaling  
190 \$2,200.00 in \$20 denominations;
  - 191 d. The exterior of the white Global Industrial brand safe found on the storage cart, visible in  
192 Exhibit 2A. (The safe was removed after taking the photo in Exhibit 2A to allow our safe  
193 cracking team to begin to work on it, which is why it is not visible in Exhibit 2D.)
  - 194 e. Six rolls of cash found inside the white Global Industrial brand safe, totaling \$4,680.00 in  
195 \$20 denominations, visible in Exhibit 2B;
  - 196 f. One small electric scale found inside the white Global Industrial brand safe, visible in  
197 Exhibit 2B;
  - 198 g. One bag of pills found inside the white Global Industrial brand safe, totaling 253 pills,  
199 visible in Exhibit 2B
  - 200 h. One small bag of a powdered substance found inside the white Global Industrial brand  
201 safe, visible in Exhibit 2B.

202 i. One bag of pills found on the dining room table, totaling 5 pills, visible on the table in  
203 Exhibits 2C and 2E.  
204

205 25. We did not test for DNA on any of the items collected or on any of the surfaces in the apartment.  
206 This was for two reasons. First, most of the areas were common spaces, and the presence of DNA  
207 would not be useful to our investigation. Second, DNA collection and processing is expensive  
208 and time-consuming, and we did not have the necessary departmental resources to do DNA  
209 testing in this case.  
210

### 211 **Post-Arrest Investigation of Grimes**

212  
213 26. After arresting Benson, Rodriguez, and Murray, we read each of them their Miranda rights and  
214 attempted to interview them. Initially, all three of them invoked their right to remain silent and  
215 did not speak to us.  
216

217 27. About four days after we arrested the three suspects, the State's Attorney's Office presented each  
218 of their attorneys with a cooperation proposal. I was able to review the offer and conveyed to  
219 each person that the first one to cooperate and testify against the other two would receive a  
220 sentencing recommendation of probation before judgment. That is commonly referred to as a  
221 "PBJ," and it means the person receiving the PBJ does not have a criminal conviction on their  
222 record. If they successfully complete their probation, they will not serve any time in prison and  
223 will become eligible to expunge the case from their criminal record at a later date.  
224

225 28. On December 14, 2021, Benson's attorney contacted me and informed me that Benson had  
226 decided to cooperate.  
227

228 29. On December 21, 2021, I interviewed Andy Benson at police headquarters. Benson told me  
229 everything in Benson's affidavit, with a few exceptions. I did not ask "Who is Ryan?" when  
230 Benson mentioned Ryan Grimes. I was aware of Ryan Grimes but did not consider them a  
231 suspect until after I spoke to Benson. I don't remember saying the quote that Benson mentions  
232 about being a great witness, but I did call Benson a few times to check with them and make sure  
233 they weren't wavering on their cooperation agreement. I can't imagine I used any sort of tone that  
234 would have indicated anything other than these were friendly check-in calls.  
235

236 30. While I had not originally targeted Grimes as a suspect in this case, Benson's cooperation  
237 changed everything. I believe it is extremely unlikely I would have focused my investigation on  
238 Grimes if it was not for Benson's cooperation. But that cooperation alone was not sufficient for  
239 me to seek an arrest warrant. I began to investigate Grimes on December 22, 2021, and spent the  
240 next several days completing that investigation. I did take off for Christmas Eve on December 24  
241 and Christmas Day on December 25, and did not take any investigative steps on those dates.  
242

243 31. On December 23, 2022, I received a full report from our forensic laboratory. I noted the  
244 following information as relevant to my investigation of Grimes:  
245

246 a. The small black notebook found on the table in the Benson/Rodriguez/Murray apartment  
247 had three latent prints pulled from the outside of the book. Two belonged to Shannon  
248 Murray, which was consistent with Benson's statements about the book being kept by  
249 Murray. One latent thumbprint belonged to Ryan Grimes and matched Grimes' right  
250 thumbprint.

251 b. The inside of that book contained potentially incriminating evidence against Ryan  
252 Grimes. As you can see in the photo in Exhibit 12E, the book mentions "Zombie." Based

253 on Benson’s statements, text messages, and common sense (the three seniors met Grimes  
254 at a zombie-themed game), I concluded “Zombie” likely referred to Ryan Grimes.  
255

256 c. The Global Industrial safe had four latent fingerprints. Two belonged to Andy Benson  
257 and were found on the top of the safe. One print was found on the top left of the safe near  
258 the front, and it matched the right pointer finger of Ryan Grimes. The other print was  
259 found on the left side of the safe near the top and front, and it matched the right  
260 thumbprint of Ryan Grimes.  
261

262 d. We recovered one fingerprint from Ryan Grimes on a roll of cash found in Carter  
263 Rodriguez’s room. This print matched Grimes’ right ring finger.  
264

265 e. The white powder found in the safe was confirmed by the lab to be cocaine. I will  
266 acknowledge that I found limited evidence in my investigation that anyone was selling  
267 cocaine, but I did find a bag of cocaine in a safe that Grimes could have accessed. It is  
268 possible that the involved individuals were considering selling cocaine or had just begun  
269 to sell cocaine, which would explain the limited evidence connecting Grimes to the  
270 cocaine we recovered.  
271

272 32. While there were several items recovered that did not have any forensic evidence connecting  
273 Ryan Grimes to the alleged actions, these items represented a significant enough connection  
274 between Grimes and the allegations that I determined Grimes was a potential suspect.  
275

276 33. Ordinarily, I would have conducted interviews with students on campus at Catoctin, but the  
277 school was closed for winter break and did not return until late January of 2022. I did not attempt  
278 to interview anyone else at Catoctin until late January, well after Grimes was arrested.  
279

280 34. On December 26, 2021, I met with the same team that helped me sort out the decision to seek an  
281 arrest warrant for Benson, Rodriguez, and Murray. I told them about some of the suspicious  
282 behavior I had seen from Grimes, the cooperator statements from Benson about Grimes’  
283 involvement, and the forensic evidence connecting Grimes to the apartment and items in the  
284 apartment. Detectives McNulty and Moreland agreed with me and recommended I seek an arrest  
285 warrant. My supervisor was initially hesitant, but ultimately said, “I will defer to the three of you  
286 if you feel strongly about the evidence in this case.”  
287

288 35. On December 28, 2021, I went to Ryan Grimes’ home and requested that Grimes sit for a  
289 voluntary interview. Grimes agreed, and we spoke at police headquarters. I have reviewed the  
290 transcript of that interview and agree that the transcript is accurate. I found Grimes’ answers to be  
291 forced and unconvincing, and the interview only added to my suspicions about Grimes.  
292

293 36. On January 2, 2022, I filed for an arrest warrant for Ryan Grimes, as I believed I had probable  
294 cause that Grimes was a co-conspirator in the drug ring operated by Murray, Rodriguez, and  
295 Benson. Myself and two officers went to Grimes’s parents’ home on January 3, 2022, and placed  
296 Grimes under arrest. Grimes invoked his right to remain silent and has not spoken to me since  
297 then.  
298

299 37. On January 18, 2022, Andy Benson called me to inform me that Benson received a phone call  
300 from Shannon Murray. I was able to quickly pull the audio of that call, and I agree that the audio  
301 in Exhibit 3A is that call, and the transcript in Exhibit 3 is an accurate transcript of that call.  
302

303 38. In early February of 2022, I went to Catoctin College to interview students about Ryan Grimes. I  
was dressed in plain clothes and did not identify myself as a police officer, although I have no

304 doubt the students likely recognized me immediately as law enforcement. I spoke to over 50  
305 students, and all but three refused to give me their name. Of the students I spoke to, at least 25  
306 knew at least one of Andy Benson, Carter Rodriguez, or Shannon Murray, and at least ten  
307 students had met Ryan Grimes.  
308

309 39. During these interviews in early February, no student I spoke to reported ever buying drugs from  
310 Ryan Grimes or being contacted by Ryan Grimes to purchase drugs. To be fair, no student  
311 acknowledged discussing or purchasing drugs from Benson, Rodriguez, or Murray as well. I was  
312 unable to locate any students at Catocin who could provide me with usable information about  
313 this case.  
314

315 40. The statement attributed to me by Andy Benson about Benson's testimony at Carter Rodriguez's  
316 trial is accurate. Benson has been an excellent cooperating witness, and so long as Benson  
317 continues testifying in a truthful and satisfactory manner, I intend to advocate that Benson  
318 cooperated to my satisfaction and should receive a PBJ at the conclusion of this case.  
319

320

321 *Det. Jordan Carmichael*

322 Det. Jordan Carmichael

1 **Expert Report of Dr. Simon Green**

2 Witness for the Prosecution

3  
4 This report was prepared by Dr. Simon Green. I am a social psychologist at Washington Hospital Center  
5 in Washington D.C., and I also teach classes at Georgetown University on behavioral health and social  
6 psychology. I maintain a private consulting business, Green Consulting Management (GCM). My primary  
7 client with GCM is the State of Maryland, where I am occasionally asked to offer expert testimony at trial  
8 regarding social behavior of students on college campuses.

9  
10 **Background and Experience**

11  
12 I earned my Bachelor's Degree in Psychology and Biology from Towson University in 2002. I then  
13 completed my Doctor of Philosophy in Psychology (Ph.D.) from the College of Behavioral and Social  
14 Sciences at the University of Maryland, College Park in 2006. I returned to my alma mater, Towson  
15 University, and worked as a social psychologist in their University Health Services Department from  
16 2006-2010. I then transitioned to work as a staff psychologist in the Department of Psychology at the  
17 University of Maryland School of Medicine. I worked there from 2010-2015 and specialized in caring for  
18 youth with mental health challenges and prior trauma, and I continued to conduct research into social  
19 pressures faced by students at the high school and college level.

20  
21 In 2015, I transitioned to my current position at Washington Hospital Center, where I am primarily  
22 focused on conducting research, although I do occasionally see patients. I founded GCM in 2016 and  
23 began working with the State of Maryland in 2017. I do more than just trial work with the State, as I am  
24 periodically called upon to provide informal consultation about juvenile or young adult defendants who  
25 may show signs of being influenced by social pressures.

26  
27 **Social Psychology**

28  
29 Social psychology has been defined in many ways over the years. I define social psychology as the  
30 scientific study of how interactions with others may shape and/or influence a person's thoughts, feelings,  
31 beliefs, and actions. Put another way, social psychology examines how people interact with one another.

32  
33 It would take many volumes to review the scholarly history of social psychology, but there are many  
34 broad trends that are well understood in the field. For example, the Asch conformity experiments of the  
35 1950s gave social psychologists a clearer understanding of how group dynamics can influence behavior.  
36 In the Asch experiments, eight individuals participated in a task - but only one of the eight people was an  
37 actual participant. The other seven individuals were actors. When the seven actors would collectively give  
38 an incorrect answer to an obvious question, the one study participant conformed to the group dynamic in a  
39 sizable number of cases. While these results are in line with our understanding of group dynamics, more  
40 recent experiments have shown there is more nuance to this issue. Put simply, we should not assume  
41 someone will go along with a group simply because of peer pressure, but we cannot ignore the influence  
42 that group dynamics can play in a person's actions.

43  
44 Social psychology is also closely related to neuropsychology and our ongoing study of the adolescent and  
45 teenage brain. It has long been an accepted conclusion in psychology that the teenage brain is still  
46 developing and may be vulnerable to outside pressures in a way that those in their 20s and older may not  
47 face. We are learning new information each day about some of the nuances in the teenage brain.  
48 My own research, for example, has shown that teenagers may experience a heightened sensitivity to  
49 reward. I conducted a social experiment with three different groups: children aged 8-12, teenagers aged

50 14-18, and young adults aged 22-27. Each three groups were given a simple computer game to play,  
51 where they could click on screen to inflate a balloon. Each time they clicked the balloon, they would earn  
52 \$5. But if the balloon popped, they would lose all of their earnings. In my experiment, the teenage  
53 subjects were more than twice as likely to pop the balloon as young adult subjects, and nearly 20% more  
54 likely to pop the balloon than child subjects. I modeled this experiment on others in my field that are  
55 widely accepted, and the method I used was identical to methods used by experts in my field to test  
56 behavior patterns in subjects.

57  
58 This matches with much of the existing literature on teenage brains. Teenagers, for example, may  
59 experience a heightened sensitivity to reward - a desire to make those around them happy, or a desire to  
60 go out of their way to receive the positive benefits of social connection. While I did not add a layer to my  
61 experiment where I asked friends of the subjects to watch, I believe such a layer would have caused the  
62 teenage subjects to pop the balloon even more often than the other two groups. The combination of  
63 incentives for reward and social connection is a powerful force on the teenage brain.

64  
65 It is true that some more recent studies have criticized the finding of the Ache conformity experiment. For  
66 example, multiple recent studies have shown a more nuanced understanding of how pressure from those  
67 around us can influence our behavior, and have called into question whether social pressures actually  
68 have the amount of influence that Ache claimed to have proven they do. But even with this more recent  
69 critique, there is no doubt based on the literature that people change their behavior based on the influence  
70 of others around them.

71  
72 I will not attempt to restate the entirety of scientific literature here on social psychology and the  
73 neurological pressures of the teenage brain, but it is widely understood from decades of scientific research  
74 and development that our brains are still developing well past our teenage years. But it is important to  
75 understand that this is not exclusively a negative influence. The aforementioned sensitivity to reward, for  
76 example, can be channeled into a positive outcome like an increased willingness to join a protest or a  
77 school walkout in favor of social justice, or using peer pressure for a positive end like reducing drunk  
78 driving or distracted driving.

79  
80 There are countless other examples of similar experiments that demonstrate the same basic concept: our  
81 actions are influenced by those around us, and the teenage brain may be more vulnerable to those  
82 potential influence

### 83 84 **State of Maryland v. Ryan Grimes**

85  
86 As noted previously, my consulting firm is occasionally hired by the State of Maryland to provide  
87 analysis while preparing for trial. In some of those cases, I have also presented my findings at trial. Since  
88 I began my work with the State approximately 5 years ago, I have testified in 27 cases for the State. I  
89 have never testified for the Defense and I do not offer my services to criminal defendants.

90  
91 I was contacted by the State on June 14, 2022 and asked to complete a review of the evidence in this case.  
92 I was specifically asked to look at the psychological factors present in the relationship between Ryan  
93 Grimes and three individuals: Andy Benson, Carter Rodriguez, and Shannon Murray (the “three seniors”),  
94 and to reach a conclusion about the possible influence those individuals could have on Ryan Grimes  
95 based on my understanding of Behavioral Psychology.

96 I reviewed several documents for this case, including a transcript of an interview of Ryan Grimes, witness  
97 statements from Andy Benson and Carter Rodriguez, as well as text messages between the four  
98 individuals in question. Those text messages are marked as Exhibits 4 – 9. At the time of this report,  
99 Shannon Murray is incarcerated and awaiting trial, and as a result her attorney did not permit me to



100 interview her. I requested an interview of defendant Ryan Grimes but was denied permission to interview  
101 Grimes by the attorney who I believe will be cross examining me at trial.

102 I used a standard comparison analysis method in this case. A comparison method is a common and widely  
103 accepted technique in Social Psychology where I gather information to create a picture of the social  
104 interactions between people and I compare that information to my understanding and expertise on social  
105 pressures and the human brain. I use this technique in all of my reviews in these types of cases, and I have  
106 testified in court many times using this method. I do occasionally use other names to describe this method  
107 when testifying in front of a jury, to help make the method easier to understand, but the underlying  
108 method itself does not change.

109  
110 I had sufficient facts and data to reach my conclusions in this case, and I reliably applied my comparison  
111 method to those facts. I believe had information from all relevant individuals in this case, which allowed  
112 me to build a complete picture of the social interactions between all parties. If I do not mention  
113 interviewing an individual, I did not speak to that person, and I do not believe any information from them  
114 would have changed my opinion in this case.

## 115 116 Conclusions

117  
118 I reached a single primary conclusion in this case, and that conclusion has three parts.

119  
120 I concluded to a reasonable degree of scientific certainty that three recognizable social pressures were  
121 present in the relationship between the four seniors and Ryan Grimes. Those social pressures are:

- 122  
123 1. **Age.** Grimes is three years younger than the three seniors, and is also three class years behind the  
124 seniors. This likely contributed to the presence of social pressure for Grimes to agree with the  
125 seniors in their social group.
- 126  
127 2. **Social isolation.** Grimes acknowledges limited social interaction in their first months at college,  
128 and admits the seniors were their primary social circle. A desire to avoid being isolated from the  
129 people around Grimes likely contributed to Grimes feeling social pressure to conform to the  
130 seniors' behavior to maintain that social circle and avoid social isolation.
- 131  
132 3. **The "team."** Grimes was the fourth member of a team that competed in recreational activities  
133 on campus. There is extensive scientific literature demonstrating how a desire to fit in with  
134 teammates can create social pressure and make it more likely for a person to engage in compliant  
135 behavior.

136  
137 To be clear, I cannot say if Ryan Grimes actually participated in a drug ring with the seniors. I am not a  
138 detective or a police officer. I am not attempting to analyze any evidence regarding the police  
139 investigation or the forensic evidence collected in this case, and I do not believe my opinion on that  
140 evidence would even be relevant. I can say to a reasonable degree of scientific certainty that these three  
141 social pressures were likely present in the relationship between the seniors and Ryan Grimes, and that  
142 makes it more likely that Grimes ultimately participated in the drug ring that the seniors were allegedly  
143 running. I will explain each of my sub-conclusions in more detail.

## 144 145 Age

146  
147 We've all heard the phrase, "respect your elders." The use of this phrase can vary from an expression to a  
148 representation of cultural and religious values, but the core of the phrase is rooted in social psychology.

149 Most societies perceive older people to have increased knowledge and wisdom when compared to  
150 younger people. As a result, older people often occupy positions of authority and power.  
151 In this case, Ryan Grimes first met Benson, Rodriguez, and Murray when Grimes was a freshman and the  
152 other three individuals were seniors. Based on the information I reviewed in this case, Grimes was 18 at  
153 the time of first meeting, whereas Benson, Rodriguez, and Murray were each 21 years old. But these  
154 numbers are connected to a larger story. Dynamics on a college campus are very hierarchical in nature.  
155 While most of the perceived differences are harmless (think a senior selling a freshman a key to the  
156 elevator) there is no doubt that seniors with several years of college experience are seen as “above”  
157 freshmen who have just arrived on campus.

158  
159 Evidence of this is evident from each of the statements I reviewed. Grimes was asked by Detective  
160 Carmichael about the dynamic between the seniors and Grimes, and Grimes admits in the interview that  
161 fitting in with a group of seniors was a positive development for their time on campus. And this falls in  
162 line with basic logic: of course a freshman on a college campus will want seniors to befriend them and  
163 include them in their social circle.

164  
165 I am concerned about how this pressure was applied by the seniors to Grimes. While the accounts of  
166 Benson and Rodriguez are not consistent, they each agree that someone from the group of seniors  
167 approached Grimes about joining the drug ring. Now, I have no reason to doubt the account that Grimes  
168 initially declined to be involved in selling drugs. Both individuals are at least consistent on that point. But  
169 according to Benson, Grimes was the one who reached back out and expressed interest in joining the drug  
170 ring. To me, this is trademark reward-seeking behavior. After having time to process the implications of  
171 the offer, Grimes chooses to become involved in the drug ring (according to Benson). If this account is  
172 accurate, I believe Grimes likely caved to the social pressure of seeking social rewards from older friends.

### 173 174 **Social isolation**

175  
176 Social psychology has evolved in many ways since its early days, but even Socrates recognized the power  
177 of social interactions when he wrote that “Man is by nature a social animal.” While that simplistic  
178 explanation has been studied and expanded on for centuries, the core premise remains accurate: as a  
179 general rule, humans seek out social interaction. This has degrees of truth to it, of course - the introvert  
180 may seek out only a small number of friends, while the extrovert may have many hundreds of  
181 acquaintances. But in each of these cases, it is still true that we look for connection in the world.  
182 Because of this central truth, social psychologists understand that social isolation and the desire to avoid it  
183 can be a powerful motivator. In many ways, society is still emerging from the largest social isolation  
184 experiment in history: lockdowns connected to the COVID-19 pandemic. While those closures were  
185 medically necessary to protect our safety, there is no doubt that the psychological cost was significant.  
186 Surveys taken in May and June of 2020 showed massive spikes in reports of loneliness and depression,  
187 especially among children and teenagers.

188  
189 Even as societies have mostly reopened, the long-term effects of social isolation have been shown in  
190 increases in people seeking mental health treatment and some behavioral challenges in children. This  
191 necessary but challenging global experiment confirmed much of what we already understood about social  
192 isolation: the human brain generally prefers at least some form of human contact, and most individuals  
193 will seek out human connection.

194  
195 In my opinion, there are clear signs of social isolation pressure in Grimes’ interview with Detective  
196 Carmichael. Grimes admits that making friends and connections on campus was difficult, and Grimes  
197 further acknowledges that meeting Benson, Rodriguez, and Murray changed their social outlook  
198 significantly. Grimes goes so far as to call that meeting the “turning point” of their social status on

199 campus, and admits that many of the other people they now know were people they met through the  
200 seniors or because of the seniors.  
201 That said, Grimes also notes they grew more comfortable making friends in classes and their residential  
202 hall as the semester went on, and this is in line with how I would expect their time on campus to evolve.  
203 Socially isolated students may initially latch on to the first friendships they can find, but then will slowly  
204 grow more comfortable initiating friendships with strangers and broadening their social circle. It is  
205 absolutely possible that the social isolation factors I am identifying were present early on in Grimes' time  
206 at Catocin but faded as Grimes grew more comfortable with the campus environment.

207  
208 I must admit, however, that one aspect of this case is puzzling to me. Both Benson and Rodriguez  
209 acknowledge that Grimes was recruited because their presence could bring in new customers and expand  
210 the customer base for the drug ring. (Benson and Rodriguez of course diverge on their own involvement,  
211 but at least agree on the reasoning for why Grimes was asked to help.) If Grimes was socially isolated, it  
212 seems unlikely to me that they would have been able to significantly expand the network for Benson,  
213 Rodriguez, and Murray to sell pills. I don't see a lot of evidence in my review of this case to suggest that  
214 Grimes was especially popular on campus, and given the spike in sales that is allegedly connected to  
215 Grimes, I have a hard time believing such an increase could be solely connected to Grimes telling others  
216 about the drug sales.

217

### 218 **The “team” mentality**

219

220 The final portion of my conclusion relates to what is called “team” pressure or the “team” mentality. If  
221 you've ever been a part of a winning team, you've likely felt this pressure. While the issues I have been  
222 discussing in this report were mostly limited to “group” pressures, “team” pressures are different.  
223 Teams are by their nature interdependent; they work together to accomplish a task, like putting a  
224 basketball in a hoop or moving a ball into a specific zone. As a result, successful teams typically find a  
225 team dynamic that allows them to work together successfully both on and off the field. Teams with  
226 significant off-field conflict are often less successful on the field, as those off-field conflicts and  
227 challenges can cause competitive obstacles to emerge. Think of a basketball player who does not want to  
228 pass to a player she dislikes, or a quarterback who avoids a wide receiver who he thinks is arrogant.

229

230 When a team is successful, it can have the opposite effect. Team members may go along with team  
231 decisions or actions even if they do not always agree with those actions or want to make those decisions,  
232 solely because they do not want to change or disturb the team culture. Think of a recreational league  
233 softball team that wins a big game and goes out to celebrate after the game. Some members with small  
234 children at home or with an early work deadline the next day may not want to stay out later, but may  
235 choose to do so because they want to contribute to the positive team dynamic and continue to experience  
236 the mental energy that comes from success.

237

238 In short, being on a team is different from simply being part of a group. Teammates have special,  
239 dependent relationships that can cause unique social pressures.

240

241 On the surface, it may be confusing why I am mentioning all of this regarding Ryan Grimes, but I believe  
242 a closer evaluation of this case shows evidence of a team dynamic. Grimes met Benson, Rodriguez, and  
243 Murray because of a game on campus called Humans vs. The Undead. If you've ever been to a college  
244 campus, you know that even recreational games like this one are very competitive, and participants take  
245 them seriously. The evidence I reviewed suggests the same. Benson actually acknowledges part of the  
246 reason they began to spend time with Grimes in the first place is because Grimes was a positive addition  
247 to their team, both in team dynamics and in team performance.

248 While there is limited evidence in the record about the specifics of the team dynamics while playing  
249 Humans vs. The Undead (perhaps because Detective Carmichael incorrectly believed it was not relevant),  
250 the evidence I do have suggests to me that Grimes was likely concerned that not conforming to the  
251 behavior of the seniors could have a negative impact on the team dynamic. You might have heard  
252 someone say that “winning solves everything”, and while this is a drastic oversimplification of a  
253 complicated concept, the core idea is accurate. If a team is doing well, members are very unlikely to do  
254 something that could upset the team dynamic. This is motivated both by a desire to keep winning and a  
255 fear that other members of the team could isolate or remove a team member who is perceived to have  
256 done something that hurts team success. While I have no idea if the Grimes team in this case was  
257 “winning” (to the extent that is even possible in Humans vs. The Undead), the evidence suggests the team  
258 was operating well. It is likely that Grimes would have felt pressure not to take actions that could  
259 jeopardize a positive team dynamic.

260  
261 One last note: Benson’s description of the defined roles in the drug ring matches a lot of what we know  
262 on team psychology. Defined roles are a trademark sign of a group that has become a “team” by working  
263 together toward a common objective.

## 264 Conclusion

265  
266  
267 I believe Ryan Grimes faced significant social pressure to join the drug ring operated by Benson,  
268 Rodriguez, and Murray. I further believe that Grimes’ teenage age, social isolation, and role on a team  
269 make it more likely that Grimes likely caved to these pressures and assisted with the drug ring in some  
270 way. I do not know if Grimes actually did participate in the drug ring; that is a question for the police.  
271 And I certainly cannot eliminate the possibility that Grimes did not give in to these pressures, as many  
272 people face such pressure and do not conform their behavior to that pressure. But in this case, I believe  
273 Grimes likely did conform to that pressure.

274  
275 *Dr. Simon Green*

276 Dr. Simon Green

1 **Transcript of December 28, 2021 interview of Ryan Grimes**

2 Defendant

3  
4 CARMICHAEL: OK, I am turning on the recording device. I will advise anyone in this room that this  
5 device only records audio. We do not have video recording set up in this room. I'm Detective Jordan  
6 Carmichael of the Chesapeake County Police Department. It is 11:37 PM on Tuesday, December 28,  
7 2021. I am conducting this interview with Ryan Grimes in Room #3 at CCPD headquarters. Please state  
8 your name for the record and spell your last name.

9  
10 GRIMES: Ryan Anderson Grimes. That's G-R-I-M-E-S.

11  
12 CARMICHAEL: Ryan Grimes, please listen carefully to the following items and follow along on the  
13 piece of paper in front of you. You have the right to remain silent. Anything you say or write may be used  
14 against you in a court of law. You have the right to talk to a lawyer before answering any questions and to  
15 have a lawyer present at any time before or during questioning.

16  
17 If you now want the assistance of a lawyer but cannot afford to hire one, you will not be asked any more  
18 questions at this time and you may request the court to appoint a lawyer for you without charge. If you  
19 agree to answer questions, you may stop at any time and request the assistance of a lawyer, and no further  
20 questions will be asked of you. Do you understand each of the questions I have asked?

21  
22 GRIMES: Yes, I do.

23  
24 CARMICHAEL: Knowing this, do you fully understand each of these rights?

25  
26 GRIMES: Yes.

27  
28 CARMICHAEL: Are you willing to answer questions without consulting a lawyer or having a lawyer  
29 present?

30  
31 GRIMES: Sure.

32  
33 CARMICHAEL: I need a yes or no answer, Ryan.

34  
35 GRIMES: Fine. Yes.

36  
37 CARMICHAEL: Is your decision to answer questions entirely free and voluntary and do you agree you  
38 have not been promised anything or been threatened or intimidated in any manner?

39  
40 GRIMES: I mean, you have me here for no reason. I'd really like to go home. But yes, I agree and I'm  
41 choosing to speak to you.

42  
43 CARMICHAEL: Please sign and put the date on the form in front of you where it says  
44 Acknowledgement, and then sign and date where it says "Waiver of Miranda Rights." OK, for the record,  
45 Ryan Grimes has signed and dated both portions of the "Advice of Miranda Rights" form. I am now  
46 signing and dating the form where it says "Witnessed," and I will provide Ryan Grimes with a copy of  
47 this form. Are you prepared to proceed with this interview?

48  
49 GRIMES: Let's get this over with. I've got nothing to hide.

50 CARMICHAEL: We'll see about that. How old are you?  
51  
52 GRIMES: I'm 18 years old.  
53  
54 CARMICHAEL: And your date of birth?  
55  
56 GRIMES: July 24, 2003.  
57  
58 CARMICHAEL: Where do you go to school?  
59  
60 GRIMES: I'm a freshman at Catoctin College, although we'll see how much longer I'm there.  
61  
62 CARMICHAEL: Let's take a step back. How did you end up at Catoctin?  
63  
64 GRIMES: I wanted to stay local. I grew up nearby and it just made sense for me and my family. I like  
65 going home on weekends to see my parents and my two younger siblings, and Catoctin had some  
66 activities I wanted to try.  
67  
68 CARMICHAEL: How was Catoctin when you got there?  
69  
70 GRIMES: It was okay. I ended up in a single room so I didn't have a roommate, and that made it difficult  
71 to make friends. People were nice and I connected with a few people on my floor, but I didn't really meet  
72 anyone I felt close to. That's why I decided to try some clubs.  
73  
74 CARMICHAEL: How did you adjust to college life?  
75  
76 GRIMES: It took a little while to get comfortable. I definitely had some moments during the first few  
77 weeks where I wondered if I had made a mistake. I just spent a lot of time alone, and that was hard. But it  
78 got better when I tried some clubs, like I mentioned.  
79  
80 CARMICHAEL: What clubs did you try?  
81  
82 GRIMES: I went to a bunch of information sessions. I think I looked at debate and Model U.N., but they  
83 just seemed like worse versions of Mock Trial. I thought about Student Government or chess club, but  
84 neither really interested me. But I really liked Humans vs. The Undead as soon as I went to an info  
85 session.  
86  
87 CARMICHAEL: What on earth is Humans vs. The Undead?  
88  
89 GRIMES: It's basically a game of tag. Everyone starts as a human except one person who is The Undead.  
90 They get a nerf blaster, and they tag humans by shooting them with Nerf darts. If The Undead manage to  
91 tag everyone, they win. If the humans survive long enough, they can win. It's a lot of fun.  
92  
93 CARMICHAEL: Did you join a team?  
94  
95 GRIMES: Not initially. I didn't know anyone, so I was basically a free agent. I played a game or two with  
96 people I didn't know, but then I was approached by Andy Benson who asked me to join their team.  
97  
98 CARMICHAEL: What did Benson say to you?

99 GRIMES: I remember I had a particularly good game as The Undead, and I think I managed to corner  
100 Shannon Murray, another member of that team. Benson came up to me the next day after class and asked  
101 if I was the person who played against Benson's team the night before. I confirmed I was, and Benson  
102 said they had a spot open and asked if I wanted to join.  
103  
104 CARMICHAEL: Did you agree to join the team?  
105  
106 GRIMES: Yeah, I did. Benson mentioned their team is really close and they do everything together. It  
107 was Andy Benson, Carter Rodriguez, and Shannon Murray. They were all seniors who had been playing  
108 together for three years, so I was definitely intimidated. But I also figured this was the perfect chance to  
109 make friends and find the right place for me on campus.  
110  
111 CARMICHAEL: Alright, so you join this group of seniors as a freshman. How soon after you met them  
112 did you start helping them sell drugs?  
113  
114 GRIMES: Excuse me? I don't appreciate that. I never helped any of them sell drugs and I absolutely  
115 never would. Don't accuse me of things you know I didn't do.  
116  
117 CARMICHAEL: Let's keep going with the story you were telling. You meet these three seniors, you join  
118 their team. How did your relationship with them develop?  
119  
120 GRIMES: It took a few weeks but I'd say we all got pretty close. We played Humans vs. The Undead at  
121 least once a week, sometimes twice a week, and our team was really good. I definitely fit in with them  
122 quickly and we won almost all of the games we played. After every game we'd go back to their apartment  
123 and hang out for a few hours. The three of them lived together in a shared apartment on campus. It was  
124 just the three of them and no one else living in their suite.  
125  
126 CARMICHAEL: How did you feel about having friends who were seniors?  
127  
128 GRIMES: I don't understand what you mean.  
129  
130 CARMICHAEL: Oh, come on. You had to be excited that you made friends with older students.  
131  
132 GRIMES: I mean sure, I guess so. They definitely knew their way around campus better than I did, and  
133 they did know a lot more people. So yeah, I'd say I was excited to have them as friends, but them being  
134 seniors was a nice bonus.  
135  
136 CARMICHAEL: What would you do at their apartment?  
137  
138 GRIMES: Usually just sit around and play video games. We'd order food, sometimes we'd do some  
139 studying, but mostly we'd just watch dumb videos on Tiktok or whatever.  
140  
141 CARMICHAEL: Come on, Ryan. That's all you did there?  
142  
143 GRIMES: I mean sure, we drank. They were all over 21 so they were allowed to have alcohol, and I  
144 would drink sometimes too.  
145  
146 CARMICHAEL: Now I'm not asking about your involvement right now, but just so we're clear. When  
147 was the first time you heard or saw anything related to drugs?

148 GRIMES: I'm glad you're not talking about my involvement because I wasn't involved. But that would  
149 have been after a Thursday match in September. I believe it was September 23. Carter mentioned they  
150 had a huge test the next day and needed to stay up all night and cram, and Shannon offered Carter some  
151 Adderall. I asked Shannon how Shannon had the Adderall, and the three of them just laughed. Carter took  
152 some and went off to study, and Andy pulled out a joint and lit it. They all passed it around but I didn't  
153 smoke. I have asthma so it didn't go too well when I tried smoking weed in high school.

154  
155 CARMICHAEL: You're telling me that a group of college seniors offered you a joint and you didn't take  
156 it?

157  
158 GRIMES: That's exactly what I'm telling you, because it's the truth. No one pressured me to do anything.  
159

160 CARMICHAEL: Sure they didn't. But fine, let's go back to the Adderall. You said everyone laughed  
161 when you asked about it. Was that the last time you heard about study drugs with that group?

162  
163 GRIMES: No, it wasn't. A few weeks later, Carter pulled me aside after dinner and started to tell me  
164 about selling study drugs.

165  
166 CARMICHAEL: What specifically did Carter tell you in that conversation?

167  
168 GRIMES: Carter told me that earlier that year during the Spring 2021 semester, the three of them had  
169 started to sell study drugs on campus. Carter said that Carter actually had a legit prescription for Adderall  
170 and realized how easy it was to get one. So the other three went and got prescriptions for Adderall but  
171 never actually used the drugs. They would sell the drugs on campus for a solid profit and pool the money  
172 as a group. According to Carter, tons of people on campus needed Adderall and it was really easy to sell  
173 at a major markup, especially around the time that people were taking exams.

174  
175 CARMICHAEL: What else did Carter say about this operation?

176  
177 GRIMES: Carter told me they had been hiding it from me since I joined the team, but that they used their  
178 apartment as a home base for the operation. Apparently, they were all sick of hiding it from me and they  
179 decided I wouldn't rat them out if they just told me about it.

180  
181 CARMICHAEL: Did Carter try to recruit you to join the operation?

182  
183 GRIMES: Yeah, Carter did. I think Carter was trying to gauge my reaction first. When I didn't freak out  
184 and said I wouldn't tell anyone about it, Carter asked me if I wanted in. Carter said I could get my own  
185 prescription really easily and I wouldn't even have to sell initially. Carter said I could just help them get  
186 more pills to sell and they'd still cut me in on the profits.

187  
188 CARMICHAEL: How did you react to that?

189  
190 GRIMES: I absolutely refused. Look, what they were doing was their business. I didn't like it, but I  
191 figured it wasn't my place to tell them to stop. But I had absolutely no interest in joining their operation. I  
192 just wanted to make friends and play Humans vs. The Undead. I told Carter they could do whatever they  
193 wanted in the apartment and I wouldn't say anything, but I would not be participating in any way.

194  
195 CARMICHAEL: But let's be real here, Ryan. You find out that your friends are running a drug ring, and  
196 fine, you don't snitch. I get it, you want to keep your friends. I don't even blame you for that. But you  
197 didn't even limit your time with them. In fact, based on what I've seen, you started going there even more  
198 often.



199 GRIMES: I don't think that's true, but I--  
200  
201 CARMICHAEL: Look at this document right here from your school. See all the times you swiped into  
202 their building? At all hours of the night? Don't try to tell me you weren't still going there. And you don't  
203 know this, but I was actually keeping an eye on your friends for a lot of these nights, and it sure looked  
204 like you were involved.  
205  
206 GRIMES: Don't put words in my mouth. I said I was still going to the apartment, but I wasn't helping  
207 them sell drugs. They were my friends, we spent a lot of time together. There's nothing illegal about  
208 spending time with your friends. Although I suppose you'd have to make some to know that, so maybe  
209 that's news to you.  
210  
211 CARMICHAEL: [laughs] Your words hurt me, Ryan. But okay, so let's keep going here. You find out  
212 from Carter that your friends are selling drugs. You decide to keep going to their apartment and spending  
213 time with them. Now I want to talk about something we learned during our investigation. We talked to  
214 Andy Benson, and Andy told us you changed your mind and wanted in.  
215  
216 GRIMES: Andy is a liar, you should make sure you get that on your recording. You can't trust a word  
217 Andy says.  
218  
219 CARMICHAEL: Hold on for a second. Take a look at this, your own words. I've got a text from October  
220 18, 2021 here. You texted Andy on October 18 and told Andy you needed to talk and it was better not to  
221 talk over text. That's the conversation where Andy said you changed your mind and agreed to help them  
222 out.  
223  
224 GRIMES: Is that a question?  
225  
226 CARMICHAEL: Yeah - why did you tell Andy you didn't want to put your conversation topic in writing?  
227  
228 GRIMES: Because it was personal. I had a crush on a person in my class, and I was pretty sure Andy  
229 knew that person. I wanted to ask if Andy would, well, would try to help me get a date.  
230  
231 CARMICHAEL: And you couldn't put *that* in writing?  
232  
233 GRIMES: Yeah. Andy screenshots that, sends it to a friend, and you never know where it ends up. It was  
234 easier to just talk in person.  
235  
236 CARMICHAEL: Do you recognize these texts?  
237  
238 GRIMES: [pauses] They look like texts between Andy, Shannon, and Carter, but I haven't seen them  
239 before.  
240  
241 CARMICHAEL: These are from right after you met with Andy. Andy texted the Zombie emoji and the  
242 little hotel emoji. According to Andy, this meant you were in and you confirmed to Andy that you wanted  
243 to be involved in the drug ring.  
244  
245 GRIMES: I'm not sure how many times I have to say this before you'll understand it, but Andy is lying.  
246 Not telling the truth. Full of it. Am I being clear enough?  
247  
248 CARMICHAEL: Crystal clear. Okay. But you agree that sometimes Shannon, Andy, and Carter would  
249 use Zombie as a nickname for you, don't you?

250 GRIMES: I mean, sure. They didn't say it a lot, but we met playing a zombie game, so sometimes they'd  
251 call me that.  
252

253 CARMICHAEL: Okay, so you say no, how does the rest of the semester go? Do any of the seniors bring  
254 up the drug ring again?  
255

256 GRIMES: Yeah, it came up a few more times. I think Shannon was nervous about the whole thing, so  
257 occasionally she would confide in me that she didn't like being involved. She told me it was her job to  
258 keep the books and track their supply, and she was always writing things down in a little black notebook.  
259

260 CARMICHAEL: Let's get back to that notebook in a minute. Who else brought up the drugs again?  
261

262 GRIMES: Carter did. Carter asked me a week or two later if I could at least introduce Carter to some of  
263 my friends who were younger. Carter told me Carter's plan was that I wouldn't even mention the drugs at  
264 all, I would just introduce one friend to another and Carter could handle the rest. That way I would have  
265 plausible deniability if anything went wrong.  
266

267 CARMICHAEL: Did that ever happen?  
268

269 GRIMES: No, it didn't. Again, I said no. I didn't want any of my friends to be involved in this stuff.  
270 There was no way I was going to put myself in the middle of the drug ring, even if it was just to introduce  
271 my friends to Carter. I wanted to stay out of it, and for the most part Carter, Andy and Shannon respected  
272 that.  
273

274 CARMICHAEL: Let's talk about the little black book that you mentioned Shannon kept. Do you  
275 recognize what you see in these photos? I'm showing you photos of four pages from that book.  
276

277 GRIMES: Yeah, that's the book Shannon kept. It looks like this photo was taken on the kitchen table at  
278 Ryan, Carter, and Shannon's apartment.  
279

280 CARMICHAEL: Did you ever get a chance to see what Shannon wrote in this notebook?  
281

282 GRIMES: No, I didn't. I saw her writing in it all the time, but she never let me see the contents.  
283

284 CARMICHAEL: I've read the notebook, and it documents how sales for the drug ring went up a lot in  
285 October and November of 2021. Any explanation for that?  
286

287 GRIMES: I guess, but it's just a guess. I noticed some of the other people in Humans vs. The Undead  
288 were starting to buy from Andy. I don't know how the word got out, but it spread around pretty fast and  
289 we're a fairly large community. I think that helped Andy and Carter sell a lot more, because people in  
290 Humans vs. The Undead were telling each other about how easy it was to get pills from Andy and Carter.  
291

292 CARMICHAEL: You sure you didn't tell anyone?  
293

294 GRIMES: You sure you want to keep asking the same stupid question? No, I didn't.  
295

296 CARMICHAEL: It's my job to ask questions, Ryan. Just help me out here and we'll finish this up. How  
297 many more times did one of your friends - Andy, Shannon, or Carter - bring up selling drugs again?

298 GRIMES: Bring up as in asking me to join in? Maybe two or three more times. It was always Andy or  
299 Carter though. Shannon really wasn't even that involved; I think she was never that comfortable with the  
300 whole thing.  
301  
302 CARMICHAEL: But it was still happening around you when you would hang out with them?  
303 GRIMES: Sure, occasionally. I think they knew I wasn't a big fan of them talking about it in front of me,  
304 but sometimes they did anyways. It was never for very long though.  
305  
306 CARMICHAEL: Let's keep moving through the timeline, because there's something else I want to ask  
307 you about. In November, sales are still up, but you're still not involved. The week after Thanksgiving you  
308 got the flu, right?  
309  
310 GRIMES: Yeah, I did. I was out all week.  
311  
312 CARMICHAEL: One of the things that Andy said to me - and yes, I know, Andy is a liar, I heard you  
313 loud and clear. But one of the things Andy said was that sales went way down that week because you  
314 weren't on campus to recruit new people. And this one here, the next page of the black book, for  
315 November, it sure seems to suggest that's what happened. Can you tell me what happened?  
316  
317 GRIMES: I have no idea why their sales went down that week. It was the week after Thanksgiving, so  
318 maybe that had something to do with it. I'm just guessing though. The only thing I can say for certain is it  
319 had nothing to do with me being gone, because I wasn't helping them out at all.  
320  
321 CARMICHAEL: When was the first time you heard about possibly selling cocaine?  
322  
323 GRIMES: That was the dumbest idea. Carter mentioned it to me right before Thanksgiving break.  
324 Apparently they all thought they weren't making enough money already and this could be a way to  
325 expand the operation.  
326  
327 CARMICHAEL: But you never helped them sell cocaine?  
328  
329 GRIMES: I never helped them sell anything. Adderall is one thing, but cocaine is serious stuff. No chance  
330 I'd get involved with that.  
331  
332 CARMICHAEL: But you knew about it?  
333  
334 GRIMES: I heard a thing or two from Carter, sure. That's all I knew.  
335  
336 CARMICHAEL: How did you react when they all got arrested?  
337  
338 GRIMES: Honestly, I wasn't surprised. I don't think anyone would accuse them of being master  
339 criminals. I assume someone snitched and then you got involved. Didn't Mason Huang talk to you? I feel  
340 like I heard a rumor about that at some point.  
341  
342 CARMICHAEL: I'm turning the recording off for a moment; it is 12:21 AM.  
343  
344 CARMICHAEL: I am turning the recording back on; it is 12:26 AM. I am still here with Ryan Grimes.  
345 As you were saying, Ryan, you weren't that surprised when your close friends were arrested for selling  
346 drugs.

347 GRIMES: That's not how I said it, but it's true that I wasn't very surprised. Obviously, I was sad because  
348 I knew my friends would probably be getting in a lot of trouble, but I had to focus on finishing my own  
349 semester and getting through finals.  
350  
351 CARMICHAEL: Have you had any contact with any of the three of them since they were arrested?  
352  
353 GRIMES: Not a word.  
354  
355 CARMICHAEL: Okay, we're almost done here. But I do need to ask you about a few pieces of evidence  
356 before we go. Those pages from the little black book that Shannon kept, had you ever seen them before?  
357  
358 GRIMES: Nope. I knew Shannon kept that book, but she always took care to make sure no one else  
359 touched it.  
360  
361 CARMICHAEL: That's interesting, because we found your thumbprint on the book.  
362 GRIMES: Sure, I mean I know I must have moved it once. Sometimes Shannon would leave it on the  
363 table and I would move it so we could eat.  
364  
365 CARMICHAEL: You just said Shannon never let anyone else touch it. Which one is true?  
366  
367 GRIMES: Stop trying to trap me when my answers are consistent. I didn't open the book, it wasn't my  
368 business - literally and figuratively. But if it was on the table and I needed to eat, I was going to move it.  
369 CARMICHAEL: There was a safe in the kitchen at the apartment, right?  
370  
371 GRIMES: Yeah. They kept it on a little metal storage unit next to the fridge in the main common area.  
372  
373 CARMICHAEL: Do you know what that safe was used for?  
374  
375 GRIMES: Sure. To store drugs, store cash, and really store anything that they needed to keep away from  
376 prying eyes. I never understood why they kept it in the common area, but I think Andy said something  
377 once about hiding the operation in plain sight.  
378  
379 CARMICHAEL: Did you know the combination to that safe?  
380  
381 GRIMES: Nope. Never used it. Never touched it.  
382  
383 CARMICHAEL: That's interesting, because we found two of your fingerprints on the safe.  
384  
385 [12 seconds of silence on tape]  
386  
387 GRIMES: We're done here.  
388  
389 CARMICHAEL: This is Detective Jordan Carmichael of the Chesapeake County Police Department.  
390 Subject Ryan Grimes has ended this voluntary interview and left the room. It is now 12:56 AM on  
391 Wednesday, December 29, 2021. I am turning off the recording.

1 **Affidavit of Carter Rodriguez**

2 Witness for the Defense

3 After having been duly sworn by oath, Carter Rodriguez hereby states as follows: I am over 18  
4 and competent to make this affidavit. I am testifying voluntarily and have not been subpoenaed.

5  
6 My name is Carter Rodriguez. I'm 21 years old and I was a student at Catoctin College until I  
7 was arrested in December of 2021. In August of 2022, I went to trial and was convicted of possession  
8 with intent to distribute controlled dangerous substances, specifically Adderall. I've been sentenced to  
9 two years in prison, and my prison term will begin in May of 2023.

10  
11 It's true that I didn't testify in my trial, which was a decision I reached with my attorneys. Below  
12 is a transcript of what I said in my sentencing hearing, prior to receiving my sentence of two years in  
13 prison.

---

14  
15  
16 JUDGE: Carter Rodriguez, we have now come to the portion of the sentencing hearing  
17 where you have a right to allocution. This means you have the right to be heard, should  
18 you choose. You do not have to speak if you do not want to, and I will not hold it against  
19 you if you choose to speak at that time. But if there is anything you wanted to say, now is  
20 your opportunity to be heard. Is there anything you would like to say to the court?

21  
22 RODRIGUEZ: Yes, there is. Thank you, Your Honor.

23  
24 I enrolled at Catoctin College in 2018 as a freshman. It wasn't my first choice for colleges,  
25 but once I settled in, I was able to find a group of close friends. I wanted to try and find a  
26 place to fit in on campus, and I saw a flier for Humans vs. The Undead and thought it  
27 sounded fun. I went to an info session and was talking to the people sitting near me before  
28 it started, and that's when I learned they both lived in my building. That was how I met  
29 Andy Benson and Shannon Murray. We became fast friends, and our junior year we all  
30 decided to live together.

31  
32 In March of 2021, I started to take Adderall to help with my study habits. It was a  
33 completely legitimate prescription; I went to a local doctor and they diagnosed me with  
34 ADHD. They recommended I take Adderall to see if it helped me focus, and it made a huge  
35 difference right away. My grades started to improve and I was able to finish my  
36 assignments on time. When I started taking Adderall, I had no intention of using it  
37 improperly and certainly never planned to sell it.

38  
39 I was at the library a few weeks after I started taking Adderall, and I was settling in for a  
40 late night to finish a major paper for my English Literature class. I was approached by  
41 someone I didn't know. The person introduced themselves to me as Mason and asked me  
42 if I had just taken Adderall. Mason somehow knew my name, which was weird because I  
43 didn't remember ever seeing or talking to Mason before that interaction. I was definitely  
44 hesitant because I wasn't sure how they knew my name or what I was doing, but Mason  
45 told me Mason had seen me take a pill and Mason recognized what it was. Mason asked if  
46 I would sell them some Adderall.

47 I said no immediately. I had no interest in selling drugs and I didn't want to get in trouble  
48 right as graduation was starting to feel real. I told Mason I wasn't interested and asked  
49 Mason to leave me alone. I was hoping that would be the last time I had to deal with Mason.

50 A few days later, I was hanging out with Andy and Shannon, and I took a pill of Adderall,  
51 as prescribed, because I was getting ready to leave and meet up with a study group. Taking  
52 the pill reminded me of the interaction I had with Mason in the library, and I told Andy and  
53 Shannon about that interaction. Andy was immediately interested. Andy told me I should  
54 go back and find Mason and try to get more information about what Mason would have  
55 paid for Adderall, but I pushed back and told Andy I had no plans to get involved in selling  
56 drugs. Shannon nodded her head but didn't say anything in that conversation, and Andy  
57 dropped the subject.

58  
59 Unfortunately, that wasn't the last time Andy brought up the idea to me. A week or two  
60 later, Andy pulled me aside after one of our Humans vs. The Undead games and brought  
61 up the idea again. Andy told me Andy would handle all the logistics, and all I needed to do  
62 was to keep going back to get new prescriptions, and tell Andy what doctor I used to  
63 get the prescription and what I said to that doctor. Again, I told Andy no and said to Andy  
64 that I was planning to use the Adderall for studying and nothing more. I didn't want to get  
65 involved in whatever crazy ideas Andy had to run a drug ring or something like that.

66  
67 But Andy kept asking, and asking, and asking. Andy really didn't seem capable of dropping  
68 the subject, so eventually I gave in. I told Andy I didn't want anything to do with selling  
69 the pills, but I told Andy the name of the doctor and told him what I told the doctor. Of  
70 course, what I told the doctor was the truth, but I figured if Andy said the same things the  
71 doctor would give Andy a prescription too. Somehow Andy talked Shannon into going and  
72 getting a prescription for Adderall, and in early April I remember we had a steady supply  
73 of pills to sell.

74  
75 Look, the operation was Andy's idea and I just helped out here and there to get Andy off  
76 my back. I had a safe in my room because my parents bought me one before I moved to  
77 college, so I moved the safe to our common room and we kept it on the cart next to the  
78 fridge. I gave Andy and Shannon the combination to the safe and told them they could use  
79 it for whatever they wanted to do. I had gotten an initial prescription of 30 pills of Adderall  
80 and had used four of them, so I kept two and gave the other 24 pills to Andy. I believe they  
81 were 10 mg pills of Adderall. Once I gave that initial batch to Andy, I tried to stay out of  
82 the way and ignore whatever Andy was planning with the pills.

83  
84 Yes, I've seen that book that Shannon was keeping. I know that if you look at it from a  
85 certain perspective, it can seem like I was a lot more involved than I'm saying I was. The  
86 only thing I have to say about that is that you need to consider the source. Andy may have  
87 been the one running the operation, but Shannon was Andy's right hand person. Shannon  
88 kept all of our records and made sure Andy had what Andy needed to keep everything  
89 organized. Shannon clearly wanted me to be implicated in the entire operation, but I didn't  
90 want to do anything more than giving them a few of the pills from my prescription bottle.

91  
92 JUDGE: Carter, are you really trying to suggest to the Court that you had a minimal role  
93 in this operation?

94  
95 RODRIGUEZ: Your Honor, I'm not minimizing my role in the operation; I'm trying to tell  
96 you everything that happened.

97 But yes, it's true. Over the summer of 2021, I ordered Adderall off the dark web for Andy  
98 and Shannon, and I started to help them sell pills. Andy was still doing around 80% of the  
99 work selling, but occasionally I would bring some with me and try to find a few new  
100 customers. Most of the time though, customers would find me. I assumed that Andy and

101 Shannon were sending people my way, but I never asked them about that. Either way, I do  
102 admit that in the fall of 2021 I was helping to sell Adderall pills. We ordered so many of  
103 them on the dark web that I don't think even the three of us could have sold them all.

104  
105 I know that Mason Huang is claiming we were friends and we had some sort of  
106 arrangement. That is absolutely not true. Andy knew Mason and I would see them walking  
107 together on campus sometimes. I never gave Mason any cash or had any conversations  
108 with Mason other than exchanging greetings in class. It's true that we sat next to each other  
109 in English Literature, but that was it. If Mason was involved in any of this, I definitely  
110 wasn't aware of it.

111  
112 I would also like to talk about Ryan Grimes. It's really upsetting to me that Ryan's name  
113 keeps coming up in this case. Ryan was a freshman who joined our team when we were all  
114 seniors. We needed a new fourth teammate after Tracy graduated, and we all really liked  
115 Ryan the moment we met. Ryan had a great sense of humor and was amazing at Humans  
116 vs. The Undead. It seemed like Ryan just knew all of the little shortcuts around campus  
117 and was brilliant at figuring out ways for our team to gain an edge. Ryan was one of the  
118 smartest people I knew at Catocin and I was thrilled to have Ryan on the team.

119  
120 I heard what Andy said about Ryan's role in this operation during my trial. I've actually  
121 been given Andy's affidavit to review, and I agree the affidavit contains the same  
122 information that Andy testified to during my trial. Andy was always the annoying one in  
123 the group, but I never thought Andy was this dishonest. I guess I was wrong. There's a lot  
124 about Andy's story of what happened in this case that isn't true.

125  
126 I guess I'll start with the parts that are true. Ryan became a part of our friend group, and  
127 we spent a lot of time with Ryan. Ryan fit really well into our trio and would come over to  
128 our apartment a lot. And some of those trips were late at night, because we're college  
129 students. We'd stay up late playing video games, watching movies, or just talking. For the  
130 first few weeks we knew Ryan, we just spent time together as a normal group of friends.  
131 But that did change eventually.

132  
133 In early October of 2021, like Andy said, Andy started to talk about a problem Andy had  
134 with the whole Adderall selling operation. Andy ordered a lot of pills from the dark web  
135 and I had ordered more, and we had way more supply than we could possibly sell at a fast  
136 rate. Maybe we could have sold it if I had sold more and if we had all skipped class, but I  
137 wasn't willing to do either of those things. Andy pressured me to spend more time selling,  
138 but I refused. I needed to keep my grades up and focus on graduating, even if Andy had  
139 managed to get me way more involved in this whole operation than I wanted to be.

140  
141 That was around the time when Andy had an idea. I know Andy says this was my idea, but  
142 that is absolutely not true. Andy came to me and said we needed to try and get Ryan in on  
143 the entire operation. I agree with Andy that Exhibit 6 is a text from Shannon talking about  
144 being tired because we were up late talking about "Zombie." That was a nickname we  
145 sometimes used for Ryan. But it certainly wasn't my idea. I spent the entire meeting trying  
146 to convince Andy not to tell Ryan about selling Adderall. I thought it was a terrible idea.  
147 Ryan was just a freshman and seemed impressionable at times, and I was worried that if  
148 Ryan felt like that's what we wanted Ryan to do, Ryan would go along with it just to fit in  
149 with our group. Shannon wasn't a huge fan of the idea either, but Andy was the one who  
150 kept pushing and trying to convince us Ryan should get involved.

151 This is where Andy's story really falls apart. Andy was the one who went against my  
152 wishes and talked to Ryan about the drug ring. I remember the night of October 13 when  
153 Andy met with Shannon and me in the shelves of the campus library. I think it was in the  
154 academic journals section where no one ever goes, so we figured we'd have plenty of  
155 privacy. Andy told us that Andy had looped Ryan in about selling Adderall and that Ryan  
156 wasn't interested. I was angry with Andy but also relieved to hear that Ryan said no to  
157 getting involved. I didn't want Ryan anywhere near the operation.

158  
159 After that conversation, I don't remember ever discussing Ryan's potential involvement  
160 with Andy or Shannon again. I remember the text message in Exhibit 8, and I know that  
161 wasn't about Ryan being involved in selling drugs. I don't remember exactly what Andy  
162 meant, but I think it was either that we were going to stay in and have a zombie movie  
163 marathon or that the small hotel near campus was shutting down. I'm pretty sure it was one  
164 of those two things.

165  
166 A few weeks after the text message in Exhibit 8, I was walking through the student union  
167 on campus when I was stopped by a person I didn't know. The person looked like a younger  
168 student; their voice cracked when they talked to me and they kept looking around like we  
169 were in a scene out of Breaking Bad. They asked if I was Carter, and when I said I was,  
170 they just handed me some cash and asked if I would sell them Adderall. It was obvious this  
171 person had never bought drugs before. We moved to a quieter corner and I sold them two  
172 pills, and then I kept walking. I saw them leave the student union and walk into the English  
173 lecture hall. I know the freshman English lecture was about to start in that lecture hall  
174 because I helped TA for that lecture occasionally.

175  
176 I did have a few more interactions like that where students I didn't know would come up  
177 to me and try to buy Adderall. They all seemed young and didn't really know how to  
178 communicate what they wanted without seeming nervous or scared, and I remember one  
179 of them wearing a "Catoctin Class of 2025" shirt that they give out at freshman orientation.  
180 All of these interactions were after the text message I just mentioned in Exhibit 8, but it  
181 wasn't like I saw some new rush of customers. I would say I had around six of these  
182 interactions with younger, newer buyers; maybe 10 at most. I started carrying a few more  
183 pills than usual to prepare for more people to stop me, but the pace never really picked up.

184  
185 As a side note, the idea that I was the one who had the idea to sell cocaine is one of the  
186 craziest things I've ever heard. Believe it or not, that was Shannon's idea. I have no idea  
187 why Andy is claiming it was my idea, but Shannon was the one who suggested we branch  
188 out into heavier drugs. Shannon did eventually bring a small amount of cocaine to the  
189 apartment before we got busted, but we never sold any of it. I don't know if we would  
190 have, but I remember having a conversation where Shannon said they had a plan to sell the  
191 cocaine on campus. Shannon mentioned they were planning to ask Ryan to help out, but I  
192 don't know if Shannon ever did. Andy was on board with the idea by that point, but I  
193 absolutely refused. Selling Adderall was bad enough, and there was no reason for us to sell  
194 something that could get us noticed - either by the authorities or by a rival drug dealer.

195  
196 I may as well wrap this up by talking about the raid. I remember I was home around 2:30  
197 PM on Monday, December 6, when the police came to the apartment. They had a warrant  
198 and threatened to smash the door, so we let them in. They promptly arrested me, Andy, and  
199 Shannon, and they searched the apartment. I've seen the photos in Exhibits 2A, 2C and 2D,  
200 and I agree that's what the apartment looked like after we were arrested. I also agree that  
201 everything in Exhibit 2B and 2E was recovered from our apartment.



202 I want to say a few last things about Ryan Grimes and my own involvement. Ryan Grimes  
203 was not involved in this drug ring. At no point during the entire fall 2021 semester did I  
204 witness Ryan sell Adderall, tell anyone about Andy and I selling Adderall, or participate  
205 in any way in the drug selling operation. Ryan was over at the apartment a lot, and we  
206 would avoid discussing the Adderall sales in front of Ryan because Ryan wasn't involved.  
207 I never talked to Ryan directly about my role in the operation, and I got the impression that  
208 Ryan was relieved we would avoid the subject in Ryan's presence.

209  
210 I am sorry for my role in the operation. Adderall is a legitimate medication that serves an  
211 important purpose; I know that because it benefited me. I wish I had kept that in mind when  
212 I agreed to give away some of my prescribed pills and to order Adderall from the dark web.  
213 I regret my limited role in the entire operation, and I know I made a lot of mistakes. I'm  
214 grateful for the opportunity to come clean about what I did, and I won't ever make a mistake  
215 like this again.

216  
217 JUDGE: Thank you, Carter.

218 -----  
219

220 As you can see in my allocution statement from court, I am taking responsibility for what I did. I  
221 went to trial and lost, and now all I want to do is tell the truth, do my time in prison, and put this entire  
222 experience behind me. Everything I said about Andy, Shannon, and Ryan in my statement before my  
223 sentencing is true.

224  
225 I do want to respond to a few questions that the police asked me, but that my attorney advised me  
226 not to answer before my trial. The police told me that Shannon accused me of getting a cut of Ryan's  
227 sales in exchange for covering for Ryan if the drug ring was ever busted. That's ridiculous. Ryan and I  
228 were very close friends, but why would I cover for Ryan and risk making things even worse for me? If  
229 Ryan was involved in the operation, I would admit that. I agree that Exhibit 2F shows rolls and stacks of  
230 cash that were found in my room after the raid, totaling \$2,200, and the police told me Ryan's fingerprints  
231 were found on some of that money in my room. I don't have any explanation for that except money  
232 changes hands a lot, and Ryan had absolutely nothing to do with that cash.

233  
234 In anticipation of beginning my sentence, I have a savings account that I am using to save for  
235 spending money while in prison. On October 26, 2022, Ryan Grimes transferred \$1,675.00 into that  
236 savings account. Ryan is a great friend, and Ryan knows how concerned I am that I might run out of  
237 money while in prison. Do you really think that if Ryan was paying me to cover for them, we would do  
238 that using a bank transfer that anyone can find? I know the drug ring might look stupid to the outside, but  
239 I'm not that dumb. Ryan is supporting me at a difficult time, and I would do the same for Ryan if the  
240 circumstances were reversed.

241  
242 And yes, I despise Andy Benson. Andy used to be my best friend, and then Andy got this crazy  
243 idea for the Adderall drug ring in Andy's head. If Andy had just dropped the subject, none of this would  
244 have happened. I would have graduated on time, I'd have a job by now, and I'd still be friends with Andy  
245 and Shannon. Instead, one of them is a rat and the other one is sitting in jail, and my life is ruined. Andy  
246 lied about almost everything they said about me, and they also lied about Ryan. I don't know why Andy  
247 would lie about Ryan, but maybe the State should think about whether Andy is really living up to the  
248 terms of that deal. I have no idea what the terms of Andy's deal are other than hearing Andy in court, but  
249 I bet "lying about Ryan Grimes" wouldn't make prosecutors very happy.

250  
251 I am familiar with the following exhibits: Exhibits 2A – 2F, Exhibits 4, 5, 6, 8, and 9, and  
252 Exhibits 12 and 12A – 12E.

253  
254  
255  
256  
257  
258  
259

I swear or affirm that everything in this affidavit is true. Before I wrote this affidavit I was instructed that I should include everything I know that could possibly be relevant to my testimony in this case, and I carefully followed those instructions. I am fully aware that I must update this affidavit with any new or additional information I remember from now until the moment I take the stand to testify at trial.

260  
261

*Carter Rodriguez*  
Carter Rodriguez

1 **Expert Report of Taylor Casey**

2 Witness for the Defense

3  
4 My name is Taylor Casey. I am a retired detective with the Chesapeake County Police Department. I  
5 graduated from high school in 2002 and from Anne Arundel Community College in 2004 with an A.A.S.  
6 in Law Enforcement. I enrolled in the CCPD Police Academy in 2004 and began working as a police  
7 officer with the CCPD in 2005. In 2010, I was promoted to Detective. From 2011 to 2019, I took about  
8 150 hours of additional training, in eight- and sixteen-hour increments, in various fields including drug  
9 enforcement and drug detection. In 2012 I began working in the Special Investigations Division in the  
10 Narcotics Unit as a Narcotics Detective. In 2015 I was promoted to the head of the Narcotics unit, and I  
11 actually approved Jordan Carmichael's transfer Jordan Carmichael to Narcotics in 2016, where I was  
12 Carmichael's direct superior. While working at CCPD, I also taught at the CCPD Police Academy on  
13 subjects including entry level training in identification of controlled dangerous substances, and the  
14 dangers of fentanyl ingestion.

15  
16 In July of 2020 I left the police force to start a private consulting business, Casey Industries. Casey  
17 Industries specializes in reviewing police investigations to look for potential errors or improper conduct.  
18 In essence, we're here to audit the police. I am currently the only full-time employee at my firm. I employ  
19 a part-time administrative assistant and I have as-needed contracts with two private investigators, but I  
20 handle the vast majority of our work on my own.

21  
22 As a consulting firm that looks at police investigations, we naturally work only for the defense. I could  
23 market my services to plaintiffs in civil actions, but ultimately, I decided it was more lucrative to focus  
24 my work on defense clients. I charge \$650/hour for my standard rate, and I charge a flat fee of \$10,000  
25 for each day of testimony I provide. I have published several articles in academic journals and  
26 publications that market to defense attorneys and defense firms across the country, and I am frequently  
27 invited to speak at conferences hosted by defense bars to discuss my methods for examining police  
28 conduct and finding flaws in police investigations.

29  
30 I have spent 14 hours of work in this case reviewing the available evidence and preparing my report for  
31 trial. If I testify at trial, I will charge my standard flat fee for one day of trial testimony.

32  
33  
34 **Introduction to this case**

35  
36 In March of 2022, I was contacted by attorneys for the defendant, Ryan Grimes, and asked to review the  
37 police investigation that led to the arrest of Ryan Grimes for conspiracy to distribute amphetamines and  
38 cocaine.

39  
40 I reviewed the following documents: the report of Detective Jordan Carmichael, the expert report of Dr.  
41 Simon Green, the affidavits of Andy Benson and Carter Rodriguez, and Exhibits 1-13.

42  
43 I used my standard investigative methods to come to my conclusions in this case. Different experts use  
44 different names to refer to this method (I myself have several different names for it) but the core tenants  
45 are the same: I review the applicable evidence and the reports prepared by law enforcement in a particular  
46 case, and I compare those findings to my training and experience in the field of criminal investigation.  
47 Based on that comparison, I conduct an audit of the police procedures and conclusions, and I reach an  
48 opinion about the conclusions reached by the police. My goal is not to disagree with the police every time  
49 I reach a conclusion, but I would say I find some sort of fault in police investigations in approximately  
50 70% of cases I review.

51 **Conclusions**

52

53 I reached three conclusions in this case, both to a reasonable degree of professional certainty.

54

- 55 1. At the time of Grimes' arrest, the police did not have probable cause to arrest Ryan Grimes.
- 56 2. There is insufficient evidence to conclude that Ryan Grimes was involved in narcotics trafficking  
57 (though for legal and evidentiary reasons, I reach no conclusion regarding Grimes' culpability for  
58 conspiracy to distribute narcotics).
- 59 3. Dr. Simon Green's conclusions regarding the potential for peer or group pressure are not present  
60 in the evidence for this case.

61

62 I will explain each of my conclusions in the order I have listed them above.

63

- 64 1. At the time of Ryan Grimes' arrest, Detective Carmichael and the Chesapeake County Police  
65 Department did not have probable cause to arrest Grimes.

66

67 Based on my review of the evidence, I do not believe the Chesapeake County Police Department had  
68 probable cause to arrest Ryan Grimes on January 3, 2022. To understand that conclusion, it is important  
69 to take a step back and understand probable cause and what evidence police had on the day Grimes was  
70 arrested.

71

72 The term "probable cause" originates in the Fourth Amendment to the United States Constitution, which  
73 states that "no Warrants shall issue, but upon probable cause." While probable cause is an imprecise term  
74 that has been defined many different ways, typically an analysis of probable cause should involve the  
75 totality of the circumstances and should attempt to determine whether there is a reasonable basis for  
76 believing a crime has been committed and that the particular person committed that crime.

77

78 In this case, the police had very limited information about Ryan Grimes at the time they arrested Grimes.

79

80 - Detective Carmichael notes that Grimes had been observed coming and going from the apartment  
81 building at odd hours. Ryan Grimes is a college student. The idea that college students arriving  
82 and leaving at odd hours is suspicious is an absurd statement. There are numerous explanations  
83 for this behavior that do not involve even the faintest hint of criminal behavior.

84

85 - The police point to some forensic evidence, including fingerprints found in the apartment  
86 belonging to Andy Benson, Carter Rodriguez, and Shannon Murray. As far as I can tell, no one  
87 disputes that Grimes was a frequent guest at that apartment. There is no reason to jump to  
88 conclusions and believe that forensic evidence showing Grimes spent time at the apartment and  
89 occasionally touched items at the apartment also means Grimes must have been involved in  
90 selling narcotics.

91

92 - Finally, Carmichael points to the interview with Andy Benson as evidence to support a finding of  
93 probable cause. Andy Benson's words are essentially useless. The police offered Benson an  
94 outrageously favorable cooperation agreement and provided enormous incentive for Benson to  
95 lie. If the State believes Benson cooperated adequately, Benson could ultimately escape without a  
96 scratch on Benson's criminal record. Based on my issues with the other evidence in this case, it  
97 appears to me that while Detective Carmichael does not want to admit this, Detective Carmichael  
98 is relying heavily on Benson's word. That is a significant mistake.

99 I do not mean to suggest the police had no evidence against Grimes. Grimes' presence and close  
100 connections with three individuals who were running a narcotics trafficking ring is suspicious on its own.  
101 Furthermore, the presence of Grimes' fingerprints on the safe is alarming, and it seems unlikely to me that  
102 Grimes' fingerprints would end up on that safe purely by happenstance. (That is especially true as Grimes  
103 denies ever opening the safe or even knowing the combination.) And if the "Zombie" entries in the small  
104 black book are indeed referring to Grimes, that is strong evidence of possible criminal conduct. But this  
105 limited evidence against Grimes does not amount to probable cause, and this police investigation was  
106 flawed from the beginning.

107  
108 As I will explain further in my next conclusion, the totality of the evidence collected in this investigation  
109 does not support the State's belief that Ryan Grimes was involved in narcotics trafficking.

110  
111 2. There is insufficient evidence to conclude that Ryan Grimes was involved in narcotics trafficking.

112  
113 Before I explain this conclusion, I want to make one point very clear. I am not permitted, nor will I  
114 attempt, to make a conclusion about whether Ryan Grimes is guilty of conspiracy to distribute narcotics.  
115 That is a legal question that I am not qualified to make. My opinions about this case are solely based on  
116 my experience as a former Narcotics Detective as to whether I believe certain parts of the CCPD's case  
117 hold up under scrutiny.

118  
119 With that said, I will discuss the second conclusion I reached about this case. I do not believe there is  
120 sufficient evidence to conclude that Ryan Grimes was involved in narcotics trafficking.

121  
122 My first major concern with Detective Carmichael's investigation is how Detective Carmichael handled  
123 interviewing students on campus. I mean this respectfully, but I can't really imagine a worse way to  
124 handle the critical task of interviewing students than how the detective did so in this case. According to  
125 their report, Detective Carmichael went to the Catoctin College campus in early February and attempted  
126 to interview students themselves. Unsurprisingly, they were unable to find any students willing to assist in  
127 the detective's haphazard attempt to cover for a botched investigation.

128  
129 Detective Carmichael should not have been the one to approach students, and they certainly should not  
130 have done so openly where other students could see. As Detective Carmichael admitted in their own  
131 report, the students certainly recognized the detective as law enforcement immediately. Students also  
132 likely did not want to be seen speaking to law enforcement soon after several members of their own  
133 student body had been arrested for drug trafficking. And *certainly* those students who might have  
134 purchased narcotics from any of the individuals in this case would not openly speak to a police detective.

135  
136 Simply put, investigations of this nature on college campuses need to be handled quietly and delicately.  
137 Detective Carmichael should have used other officers who could have blended in more easily on campus  
138 (either younger-looking officers or officers who could pass as professors) and quietly approached students  
139 in a more discreet setting. Detective Carmichael could have then interviewed those students in a private  
140 setting (perhaps a study room in the campus library?) where students would have felt able to speak more  
141 freely. And finally, students should have been reassured that they were not themselves at risk of being  
142 arrested or reported for criminal conduct. Think about this logically: if you bought Adderall from Ryan  
143 Grimes, and you're approached on campus by a police officer who asks you questions about your actions,  
144 are you going to say anything? You probably won't even want to give them your name - and that's  
145 exactly what happened here.

146  
147 I believe this case is a good example of something that you could only spot if you've done an  
148 investigation like this before. If you look at the sequence of events, you can see from Detective  
149 Carmichael's own report that Ryan Grimes was not even on Detective Carmichael's radar until after

150 Carmichael's interview with Andy Benson. That is very concerning to me. Look, I've been in that  
151 situation. You think you've got all the details of a case and then a cooperating witness gives you  
152 something new to consider. You're skeptical of the information but decide to investigate based on the  
153 word of your cooperator, and you view all of the evidence through a biased lens.

154  
155 I'm not offering an opinion on whether you should believe Andy Benson; that's for a future jury to  
156 decide. But in my professional opinion, Benson's testimony changed this case in a critical and unfortunate  
157 way. Detective Carmichael went looking for evidence to convict Ryan Grimes instead of looking for  
158 evidence of the truth, and that's why Ryan Grimes has been charged even though no one except for one  
159 person (Andy Benson) even claims Grimes had a connection to this case.

160  
161 3. Dr. Simon Green's conclusions about Ryan Grimes are not supported by evidence.

162  
163 To be clear, I am not a psychologist like Dr. Green, and I am not offering an opinion about any of the  
164 science Dr. Green discusses in their report. But I did receive six weeks of departmental training in  
165 behavioral health in 2016, and at the end of that training I received a department-issued certificate in  
166 Behavioral Health Management. The training covered topics like human behavior, conflict avoidance and  
167 de-escalation, and some basic psychological instruction on how humans can be influenced by factors  
168 around them. And I worked for several years as an officer and a detective, where I worked on a daily  
169 basis with hundreds of people. I have interviewed thousands of people and observed how interview  
170 subjects react to a wide variety of questions. That experience and training have given me the  
171 qualifications necessary to offer a limited opinion on Dr. Green's conclusion about Ryan Grimes.

172  
173 Dr. Green writes in their report that "three recognizable social pressures were present in the relationship  
174 between the four seniors and Ryan Grimes." Dr. Green lists those factors as age, social isolation, and the  
175 "team" mentality. First, I'll start with where I agree with Dr. Green. Ryan Grimes is younger than the  
176 other three individuals in this case, and at the start of college Grimes likely experienced some form of  
177 social isolation. Finally, I agree that Grimes was on a team with the three seniors, and Grimes was the  
178 youngest and newest member of that team.

179  
180 But based on my review of Grimes' behavior in their interview with Detective Carmichael, I don't believe  
181 those factors played a role in this case. Grimes appears to be a confident and well-adjusted individual in  
182 the interview transcript. Grimes pushes back on some of the questions and does not deny their close  
183 relationship with Benson, Murray, and Rodriguez. Grimes also refutes the idea that Grimes was socially  
184 isolated by discussing how they had other friends on campus - and this notion of social isolation is based  
185 on an inherent contradiction. If Grimes was recruited by the others to expand their network of potential  
186 sales, why would this well-established and successful drug ring choose a social outcast to help their  
187 network grow? It doesn't make sense to me.

188  
189 Based on my review of the evidence in this case, I'm not saying those factors identified by Dr. Green  
190 couldn't be present in this case. But it looks like Dr. Green decided that because the basic facts I  
191 mentioned above are present, that must mean Ryan Grimes was impacted by those facts. That is a leap in  
192 logic that I do not believe is supported by the descriptions of Grimes' demeanor, behavior, and actions.  
193 Any freshman with the ability to integrate themselves into a well-established group of older students is  
194 not likely to just go along with anything those students want to do. Although I will admit this can be  
195 turned on its head; perhaps the very reason Grimes was able to become a part of the group was because  
196 Grimes did not challenge the status quo.

197  
198 Finally, I will acknowledge the limitations of this conclusion. I would feel much more confident about  
199 this conclusion if I could have interviewed Ryan Grimes. I contacted the attorney who is conducting the  
200 direct examination of Ryan Grimes at trial and asked if I could interview Grimes for this report, and that

201 attorney rejected my request. I believe I have sufficient facts and data to understand Grimes' personality  
202 based on the documents I reviewed in this case, but there is no doubt that my review was limited because  
203 I was unable to speak with Ryan Grimes myself.  
204

205 *Taylor Casey*

206 Taylor Casey