

STATE OF \* IN THE  
MARYLAND \* CIRCUIT COURT  
V. \* FOR  
TIFFANY ALSTON, \* ANNE ARUNDEL  
aka TIFFANY A. GRAY \* COUNTY

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**INDICTMENT**

The Grand Jurors of the State of Maryland for the body of Anne Arundel County do on their oath present that

**COUNT 1**

**TIFFANY ALSTON, aka Tiffany A. Gray**

on or about the 23<sup>rd</sup> of December, 2010, at Anne Arundel County aforesaid, did steal money having a value of at least **ONE THOUSAND DOLLARS (\$1,000.00)**, but less than **TEN THOUSAND DOLLARS (\$10,000.00)**, property of the campaign finance entity ““Friends of Tiffany Alston,” to wit: being then and there the duly appointed Chairperson of the campaign finance entity “Friends of Tiffany Alston”, and having signature authority over the bank account of that entity, did willfully and knowingly exert unauthorized control over the funds of “Friends of Tiffany Alston,” by writing a check payable to herself and cashing same check for her personal use and benefit, in violation of Section § 7-104 of the *Criminal Law Article*, Annotated Code of Maryland and against the peace, government and dignity of the State

(Theft over \$1,000.00, *Criminal Law Article*, § 7-104)

**COUNT II**

And the jurors aforesaid upon their oath aforesaid do further present that the said

**TIFFANY ALSTON, aka Tiffany A. Gray**

between on or about the 16<sup>th</sup> day of September, 2010 and through and including the 23<sup>rd</sup> day of September, 2010, at Anne Arundel County aforesaid, did steal money having a value less than **ONE THOUSAND DOLLARS (\$1,000.00)**, property of the campaign finance entity "Friends of Tiffany Alston," to wit: being then and there the duly appointed Chairperson of the campaign finance entity "Friends of Tiffany Alston," and having signature authority over the bank account of that entity in the name of "Friends of Tiffany Alston," did willfully and knowingly exert unauthorized control over the funds of "Friends of Tiffany Alston" by drawing and issuing two checks drawn on the account of "Friends of Tiffany Alston" totaling \$660.00 to pay the law firm salary of an employee of her law firm to her personal use and benefit, in violation of § 7-104 of the *Criminal Law Article*, Annotated Code of Maryland and against the peace, government and dignity of the State.

(Theft less than \$1000.00, *Criminal Law Article, § 7-104*)

### COUNT III

And the jurors aforesaid upon their oath aforesaid do further present that the said

**TIFFANY ALSTON, aka Tiffany A. Gray**

between on or about the 16<sup>th</sup> day of September, 2010 and through and including on or about the 23rd day of December, 2010, at Anne Arundel County aforesaid, being then and there the duly appointed Chairperson of the campaign finance entity "Friends of Tiffany Alston," did knowingly and willfully make disbursements from the designated campaign fund account of "Friends of Tiffany Alston" for expenses not in accordance with the purposes of the entity, to wit: drew and issued two checks drawn on the account of "Friends of Tiffany Alston" totaling \$660.00 to pay the law firm salary of an employee of her law firm; drew and issued two checks drawn on the account of "Friends of Tiffany Alston" to pay for wedding expenses totaling \$3560.00; and drew and cashed a check drawn on the account of "Friends of Tiffany Alston" payable to herself in the amount of \$1250.00; in violation of § 13-218(b)(1)(ii) of the *Election Law Article* of the Annotated Code of Maryland and against the peace, government and dignity of the State. (Unlawful Disbursement, *Election Law Article § 13-218(b)(1)(ii)*)

**COUNT IV**

And the jurors aforesaid upon their oath aforesaid do further present that the said

**TIFFANY ALSTON, aka Tiffany A. Gray**

from on or about the 16th day of September, 2010 and through and including the 23rd day of December, 2010, at Anne Arundel County aforesaid, being then and there the duly appointed Chairperson of the campaign finance entity "Friends of Tiffany Alston," a responsible officer of said committee charged with the fiduciary duty to ensure that expenditures of the committee were made only for campaign purposes, in violation of said fiduciary duty, did fraudulently and willfully appropriate money in an amount exceeding \$1,000.00, held by her in a fiduciary capacity for the benefit of "Friends of Tiffany Alston", to her personal use and benefit, contrary to the trust reposed in her, in violation of § 7-113 of the *Criminal Law Article*, Annotated Code of Maryland and against the peace, government and dignity of the State.

(Fraudulent Misappropriation by a Fiduciary, *Criminal Law Article*, § 7-113)

**COUNT V**

And the jurors aforesaid upon their oath aforesaid do further present that the said

**TIFFANY ALSTON, aka Tiffany A. Gray**

from on and including the 6<sup>th</sup> day of April, 2010 and through and including the 23<sup>rd</sup> day of December, 2010, at Anne Arundel County aforesaid, being then and there both the duly appointed Chairman of the campaign finance entity "Friends of Tiffany Alston" and the candidate authorizing that campaign finance entity, did knowingly and willfully make disbursements for the campaign finance entity known as "Friends of Tiffany Alston" in violation of § 13-218(d)(3) of the *Election Law Article* of the Annotated Code of Maryland, and against the peace, government and dignity of the State.

(Improper Disbursement by Chairperson, *Election Law Article § 13-218(d)(3)*)

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