



DISTRICT COURT OF MARYLAND FOR Wicomico County

Located at Multi-Serv Ctr, 201 Baptist St, Salisbury, Maryland 21801



Case No. 2H00078885

STATE OF MARYLAND VS. ENNIS, LARRY ALLEN LAMAR

COMPLAINANT:

Officer: WALLER

Agency/Subagency: DE 8270

Officer ID: 2112

509 OVERBROOK DR
SALISBURY, MD 21801

CC#: 2015-28148

SID:

LID:

DL#:

Race: 1 Sex: M

Ht: 6' 2"

Wt: 150

Hair: BLK Eyes: BRN

DOB: 08/04/1995

Phone(H): 443-859-1683

Phone(W):

STATEMENT OF CHARGES

UPON THE FACTS CONTAINED IN THE APPLICATION OF Officer: WALLER IT IS FORMALLY CHARGED THAT ENNIS, LARRY ALLEN LAMAR at the dates, times and locations specified below:

NUM	CHG/CIT	STATUTE	PENALTY	DESCRIPTION OF THE CHARGE
001	1 0990	CR 2 201	LIFE	MURDER - FIRST DEGREE On or About 08/02/2015 2625 N SALISBURY BLVD SALISBURY MD 21801 ...did feloniously, willfully and of deliberately premeditated malice aforethought kill and murder Rakim Russell. Against the Peace, Government, and Dignity of the State.
002	1C0990	CL	LIFE	CON-MURDER - FIRST DEGREE On or About 08/02/2015 2625 N SALISBURY BLVD SALISBURY MD 21801 ...did conspire with Kyshir Connally to feloniously, willfully and of deliberately premeditated malice aforethought kill and murder Rakim Russell. Against the Peace, Government, and Dignity of the State.
003	1C0990	CL	LIFE	CON-MURDER - FIRST DEGREE On or About 08/02/2015 2625 N SALISBURY BLVD SALISBURY MD 21801 ...did conspire with Jarrett Stokes to feloniously, willfully and of deliberately premeditated malice aforethought kill and murder Rakim Russell. Against the Peace, Government, and Dignity of the State.
004	1 0999	CR 2 204	30 Y	MURDER-SECOND DEGREE On or About 08/02/2015 2625 N SALISBURY BLVD SALISBURY MD 21801 ...did feloniously and with malice aforethought, kill and murder Rakim Russell. Against the Peace, Government, and Dignity of the State.
005	1C0999	CL	30 Y	CON-MURDER-SECOND DEGREE On or About 08/02/2015 2625 N SALISBURY BLVD SALISBURY MD 21801 ...did conspire with Kyshir Connally to feloniously and with malice aforethought, kill and murder Rakim Russell. Against the Peace, Government, and Dignity of the State.
006	1C0999	CL	30 Y	CON-MURDER-SECOND DEGREE On or About 08/02/2015 2625 N SALISBURY BLVD SALISBURY MD 21801 ...did conspire with Jarrett Stokes to feloniously and with malice aforethought, kill and murder Rakim Russell. Against the Peace, Government, and Dignity of the State.
007	1 1420	CR 3 202	25 Y	ASSAULT-FIRST DEGREE

Date : 08/05/2015 Time : 11:42 AM

Tracking No. 151001539802

Judicial Officer:

2125



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STATE OF MARYLAND VS. ENNIS, LARRY ALLEN LAMAR

008	1C1420	CL	25 Y	On or About 08/02/2015 2625 N SALISBURY BLVD SALISBURY MD 21801 ...did assault Rakim Russell in the first degree in violation of CR 3-202, contrary to the form of the act of the assembly in such case made and provided and against the peace, government and dignity of the state. Against the Peace, Government, and Dignity of the State.
				CON-ASSAULT-FIRST DEGREE On or About 08/02/2015 2625 N SALISBURY BLVD SALISBURY MD 21801 ...did conspire with Kyshir Connally to assault Rakim Russell in the first degree in violation of CR 3-202, contrary to the form of the act of the assembly in such case made and provided and against the peace, government and dignity of the state. Against the Peace, Government, and Dignity of the State.
009	1C1420	CL	25 Y	CON-ASSAULT-FIRST DEGREE On or About 08/02/2015 2625 N SALISBURY BLVD SALISBURY MD 21801 ...did conspire with Jarrett Stokes to assault Rakim Russell in the first degree in violation of CR 3-202, contrary to the form of the act of the assembly in such case made and provided and against the peace, government and dignity of the state. Against the Peace, Government, and Dignity of the State.
010	1 1415	CR 3 203	10 Y &/or \$2,500.00	ASSAULT-SEC DEGREE On or About 08/02/2015 2625 N SALISBURY BLVD SALISBURY MD 21801 ...did assault Rakim Russell in the second degree in violation of CR 3-203, contrary to the form of the act of the assembly in such case made and provided and against the peace, government, and dignity of the state. Against the Peace, Government, and Dignity of the State.
011	1C1415	CL	10 Y &/or \$2,500.00	CON-ASSAULT-SEC DEGREE On or About 08/02/2015 2625 N SALISBURY BLVD SALISBURY MD 21801 ...did conspire with Kyshir Connally to assault Rakim Russell in the second degree in violation of CR 3-203, contrary to the form of the act of the assembly in such case made and provided and against the peace, government, and dignity of the state. Against the Peace, Government, and Dignity of the State.
012	1C1415	CL	10 Y &/or \$2,500.00	CON-ASSAULT-SEC DEGREE On or About 08/02/2015 2625 N SALISBURY BLVD SALISBURY MD 21801 ...did conspire with Jarrett Stokes to assault Rakim Russell in the second degree in violation of CR 3-203, contrary to the form of the act of the assembly in such case made and provided and against the peace, government, and dignity of the state. Against the Peace, Government, and Dignity of the State.
013	1 1425	CR 3 204 ((a)(1))	5 Y &/or \$5,000.00	RECKLESS ENDANGERMENT On or About 08/02/2015 2625 N SALISBURY BLVD SALISBURY MD 21801 ...did recklessly engage in conduct, to wit: Shooting a gun that created a

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substantial risk of death or serious physical injury to crowd of 100+ people.
Against the Peace, Government, and Dignity of the State.

014 1 1425 CR 3 204 ((a)(1)) 5 Y &/or \$5,000.00

RECKLESS ENDANGERMENT
On or About 08/02/2015
2625 N SALISBURY BLVD
SALISBURY MD 21801

...did recklessly engage in conduct, to wit: shooting a gun that created a
substantial risk of death or serious physical injury to Robert Doe.
Against the Peace, Government, and Dignity of the State.

015 1 5202 CR 4 101 ((c)(1)) 3 Y &/or \$1,000.00

DANGEROUS WEAPON-CONCEAL
On or About 08/02/2015
2625 N SALISBURY BLVD
SALISBURY MD 21801

...did carry hand gun , a dangerous weapon, concealed about his person.
Against the Peace, Government, and Dignity of the State.

016 1 5200 CR 4 101 ((c)(2)) 3 Y &/or \$1,000.00

DANGEROUS WEAPON-INT/INJURE
On or About 08/02/2015
2625 N SALISBURY BLVD
SALISBURY MD 21801

...did openly carry hand gun , a dangerous weapon, with the intent of causing
injury to Rakim Russell in an unlawful manner.
Against the Peace, Government, and Dignity of the State.

017 1 0175 CR 4 203 3 Y &/or \$2,500.00

HANDGUN IN VEHICLE
On or About 08/02/2015
2625 N SALISBURY BLVD
SALISBURY MD 21801

... did knowingly transport a handgun in a vehicle upon the public roads generally
used by the public.
Against the Peace, Government, and Dignity of the State.

018 1 5212 CR 4 203 3 Y &/or \$2,500.00

HANDGUN ON PERSON
On or About 08/02/2015
2625 N SALISBURY BLVD
SALISBURY MD 21801

...did transport a handgun about their person.
Against the Peace, Government, and Dignity of the State.

019 1 5299 CR 4 204 (b) 20 Y

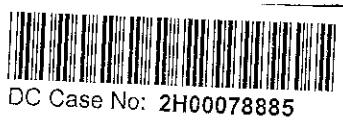
FIREARM USE/FEL-VIOL CRIME
On or About 08/02/2015
2625 N SALISBURY BLVD
SALISBURY MD 21801

... did use a firearm in the commission of a felony.
Against the Peace, Government, and Dignity of the State.



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

LOCATED AT (COURT ADDRESS)
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DC Case No: 2H00078885

RELATED CASES:

COMPLAINANT **DEFENDANT**

DFC A. Waller #2112
Printed Name
699 W. Salisbury Pakrway
Address
Salisbury, MD 21801
City, State, Zip
DE, 8270 2112
Agency, sub-agency, and I.D. # (Officer Only)

410-548-3113
Telephone

Larry Allen Lamar Ennis
Printed Name
509 Overbrook Dr
Address
Salisbury, MD 21801
City, State, Zip
CC# 201500028148
Telephone 443-859-1683

DEFENDANT'S DESCRIPTION: Driver's License# N/A Sex M Race B Ht 602 Wt 150
Hair BLK Eyes BRO Complexion N/A Other N/A D.O.B 8/4/1995 ID _____

APPLICATION FOR STATEMENT OF CHARGES Page 1 of 4

I, the undersigned, apply for statement of charges and a summons or warrant which may lead to the arrest of the above named Defendant because on or about August 2, 2015 at 2625 N. Salisbury Blvd Salisbury, MD 21801, the above named Defendant

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

*****SEE ATTACHED*****

(Continued on attached _____ pages) (DC-CR-001A)

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

8/5/15
Date

Dick A. Waller
Officer's Signature
Dick A. Waller
Printed Name

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

Date

Applicant's Signature

Printed Name

Subscribed and sworn to before me this 5 day of August 2015
Time: 11:25 AM PM Judge/Commissioner Waller 2125
Month Year I.D.

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

I have advised applicant of shielding right. Applicant declines shielding.

I declined to issue a charging document because of lack of probable cause.

8/5/15
Date

Waller
Commissioner
2125
Printed Name I.D.

Tr.#151001539802

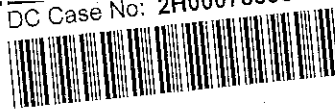


DISTRICT COURT OF MARYLAND FOR Wicomico County

LOCATED AT (COURT ADDRESS)

201 Baptist St
Salisbury, MD 21801

DC Case No: 2H00078885



(City/County)

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

Ennis, Larry A

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

On August 2, 2015, at approximately 0008 hours, members of the Salisbury City Police Department, along with allied agencies responded to America's Best Value Inn, 2625 North Salisbury Boulevard, Salisbury, Wicomico County, Maryland, in reference to shots fired and a large crowd making a disturbance.

Upon arrival, officers observed a single black male, later identified as Rakim Russell, lying on the ground with a gunshot wound to his head. Officers attempted life-saving efforts on Russell while warding off an unruly crowd of approximately 100+ individuals. Russell was transported to Peninsula Regional Medical Center (PRMC), located at 100 East Carroll Street, Salisbury, Wicomico County, Maryland, where he was later pronounced deceased. The Doctors at PRMC shared with investigators that the suspected cause of Russell's death was the gunshot wound that he sustained.

Members of the Salisbury Police Department Criminal Investigation Division (CID) responded to America's Best Value Inn. Detectives learned that an entertainment group known as "Thoughtful Minds," operated by Kenyon Turner and Zhane Binns, were hosting a large party for individuals under the age of twenty-one (21). Turner advised the party was advertised through all social media outlets including Twitter, Instagram, and Facebook. Turner advised that there were at least 188 guests in attendance at this party. Turner advised that there were several verbal and physical fights occurring at the party prior to the shooting. Turner stated that he decided to close the party down due to the occurrence of multiple fights; he subsequently forced everyone out of the party and into the parking lot of the hotel. Turner stated there were nearly 180 guests in the parking lot of America's Best Value Inn. Turner stated that several fights were taking place amongst several groups in the parking lot and he was attempting to break them up. Turner stated that he observed Rakim Russell in the parking lot with a group of party attendees. He stated that Russell's group was in the parking lot on the north side of business. Turner advised that while he was standing near Russell, he heard approximately four to six (4-6) gunshots from a firearm and he found cover. Turner advised that he next observed Russell lying on the ground.

Through the investigation it was learned that subjects later identified as Larry Ennis and Kyshir Connally attended the party at America's Best Value Inn. The investigation revealed that Ennis and Connally had outstanding issues with the majority of the subjects at the America's Best Value Inn. While at the party several subjects threatened to assault Connally and were making threatening hand gestures toward both Connally and Ennis.

On or about August 4th, 2015, Detectives interviewed a person who will be hereinafter referred to as "Confidential Source -A" or "A." The name of confidential source "A" is being withheld from this document because of the source's safety. "A" has cooperated with investigators which included participation in a recorded interview with Detectives on or about August 4th, 2015. "A's" name, address and other identifying information is known to law enforcement. "A" is acquainted with Ennis, Stokes, and Connally and has socialized with them. "A" was in close proximity to Ennis, Connally and Stokes when they discussed using a gun to retaliate for the hostile treatment they received at the party. "A" was in close proximity to the vehicle occupied by Connally, Ennis and Stokes when "A" observed Stokes fire a semi-automatic handgun at the direction of the decedent. "A" was an eyewitness to this shooting and his/her description of how and where Stokes fired from is consistent with other witness statements made to investigators, including the location of the gunfire, the general trajectory of the gunshots, and the fact that the shooter was riding in and shooting from a White Impala. Physical evidence collected at the scene—e.g. bullet hole in the hotel wall and location of the decedent's body—is consistent with "A's" statements made about how the shootings occurred.

8/5/15

Date

DR J L 2117

Applicant's Signature

DR A WALKER 2117

Printed Name

Tr.# 151001539802



DISTRICT COURT OF MARYLAND FOR Wicomico County

(City/County)

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DC Case No: 2H00078885

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

Ennis, Larry A

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 3 of 4

"A" additionally advised the following: "A" stated he/she transported Ky'shir Connally and Larry Ennis to party at America's Best Value Inn at approximately 2145 hours on August 1, 2015. "A" advised they wanted to get to the party prior to 2200 hours to avoid the increased cover charge. "A" advised he/she, Connally and Ennis stayed at the party where multiple people apparently were hostile to Connally, Ennis and others who arrived with the men. The individuals who were hostile to Connally in the party were verbally insulting Connally and his friends and were making threatening hand gestures. Connally was threatened to a point at which "A," Connally and Ennis left the party and went to Connally's residence for a short period of time.

"A" stated he/she, Connally and Ennis left Connally's residence and "A" was advised by Connally and Ennis to go to I-hop (a restaurant located at 2732 North Salisbury Boulevard, Salisbury, Wicomico County, Maryland.) "A" stated when they arrive at I-hop they met with a friend named Jarrett Stokes. "A" advised he/she is uncertain whether or not Stokes brought the firearm used in the murder or if Connally or Ennis were in possession of it previously. "A" observed Stokes seated in the front passenger seat of the suspect vehicle with a black semi-automatic handgun sitting in his lap. "A" stated the handgun was wrapped in a dark in color garment of some sort.

"A" stated that shortly after leaving the I-hop parking lot, he/she distinctly heard Stokes ask Connally and Ennis if "it" (the gun) was ready," to which Ennis responded with "I don't know." "A" advised he/she distinctly recalled hearing the slide being racked on the handgun, by Stokes, and could hear Stokes state "it is now." "A" advised Connally was seated in the rear driver side seat and Ennis was seated in the rear passenger side seat. "A" was told to drive towards the America's Best Value Inn. It was apparent to Detectives, while speaking to "A", that "A" believed the sole purpose for Stokes, Connally and Ennis to go back to the America's Best Value Inn was to engage in retaliation against the subjects at the party. "A" advised Ennis and Connally felt like cowards for leaving the party after being threatened by the subjects at the party.

"A" advised he/she was ordered to drive toward the America's Best Value Inn, by driving through the parking lot of Applebee's, located at 2703 North Salisbury Boulevard, Salisbury, Wicomico County, Maryland. "A" stated he/she was ordered to drive around the west side of the Mattress Warehouse, located at 2639 North Salisbury Boulevard, Salisbury, Wicomico County, Maryland, and park near the curb on the south side of the business, adjacent to the America's Best Value Inn. "A" advised he/she was frightened due to seeing Stokes with the above mentioned handgun. "A" advised the vehicle was parked facing east bound, with the passenger side of the vehicle facing the America's Best Value Inn. "A" stated that a teenage subject was standing outside of the White Impala speaking with Ennis. "A" further stated that Ennis and the teen were looking at a crowd gathered in the hotel parking lot and that they were discussing whether a red shirted subject was among those gathered in the lot. "A" explained that the red shirted subject Ennis and the teen were looking for was among those who were previously hostile to Connally, Ennis and their friends. "A" advised that Jarrett Stokes next fired approximately 4 rounds from the handgun at the large crowd while seated in the passenger seat of the White Impala.

"A" advised that he/she "peeled" out of parking lot once Stokes began shooting at the crowd. "A" then drove at a high rate of speed towards Delmar. "A" stated he/she drove to an unknown address in Delmar. "A" advised Connally, Ennis, and Stokes began receiving phone calls that "Roc" was identified as having been shot and killed. It should be known the "Roc" is a Known moniker for Russell. "A" stated Ennis began to panic after receiving phone calls and stated to the group "we're going down." "A" advised Stokes left them on foot. "A" stated that after Stokes left, Connally and Ennis began discussing where to hide the handgun.

8/5/15

Date

ORE A L 2112

Applicant's Signature

ORE A L 2112

Printed Name

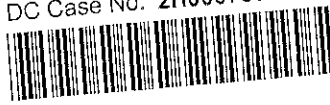


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(City/Country)

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

Ennis, Larry A

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

"A" stated numerous efforts were made by Connally on the following day to inquire if "A" had been contacted by the police. "A" stated Connally informed him/her to give a false alibi regarding Stokes, Ennis, and Connally's whereabouts during the shooting. "A" was instructed to give the same story Ennis and Connally gave to investigators when they came to the Salisbury Police Department (i.e. that they were all at a party on Line Road at the time of the shooting).

On or about August 4th, 2015, a Salisbury Police Department intercepted and recorded a call between "A" and Connally. During the course of the recorded conversation Connally advised "A" that he/she should clean out his/her car. Connally further stated that the gun and shell casings were not in "A's" car—stating on the recording: "chill, the gun isn't in your car."

"A" drives a White Impala that is in the custody of the Salisbury Police Department.

Based upon the investigation and the knowledge, training and experience of the undersigned, one of the shots fired into the crowd struck Russell causing severe injury followed by his death. An additional shot fired by Stokes entered a hotel room (Room 208) which was occupied by Robert Doe. The projectile from this shot hit several objects and came to rest at the foot of Doe's bed. Doe was in bed at the time the round entered his hotel room. Many individuals, mostly teens, were in the parking lot at the time Stokes fired his weapon. All of these individuals were at risk of serious physical injury or death at the time Stokes fired his weapon according to the knowledge, training and experience of the undersigned officer.

Temporary Felony warrants were issued for Connally, Stokes and Ennis. Connally and Stokes were arrested and subsequently transported to SPD for interviews.

During a post Miranda interview Connally provided statements confirming the information "A" provided.

Connally acknowledged being involved in a conversation with Stokes and Ennis regarding returning to the America's Best Value Inn in order to retaliate against the subjects in the party. Connally also acknowledged observing a firearm in the vehicle prior to the shooting. Connally advised he was present, in the vehicle with Ennis and Stokes, when Stokes fired the gun, subsequently striking and killing the victim, Russell.

All above events occurred in Salisbury, Wicomico County, Maryland

8/5/15

Date

DFC A WAIVER 212

Applicant's Signature

DFC A WAIVER 212

Printed Name

Tr.#151001539802