

VIRGINIA:

BEFORE THE VIRGINIA STATE BAR DISCIPLINARY BOARD

IN THE MATTER OF
SEAN HANOVER

VSB Docket #19-000-113945

RULE TO SHOW CAUSE
AND
ORDER OF SUMMARY SUSPENSION AND HEARING

It appearing to the Board that Sean Hanover was licensed to practice law within the Commonwealth of Virginia on April 4, 2012, and,

It further appearing that Sean Hanover was convicted of Child Pornography Distribution on October 3, 2018, in the Circuit Court for Baltimore County in the State of Maryland, Case No. 03-K-17-004477, and

It further appearing that Sean Hanover has been convicted of a crime, as defined by the Rules of Court, Part 6, Section IV, Paragraph 13-1,

It is ORDERED, pursuant to the Rules of Court, Part 6, Section IV, Paragraph 13-22 that the license of Sean Hanover to practice law within the Commonwealth of Virginia be, and the same is, hereby SUSPENDED, effective October 26, 2018.

It is further ORDERED that Sean Hanover appear before the Virginia State Bar Disciplinary Board at the State Corporation Commission – Courtroom B, Second Floor, Tyler Building, 1300 East Main Street, Richmond, VA 23219 at 9:00 a.m., on Friday, November 16, 2018, to show cause why his license to practice law within the Commonwealth of Virginia should not be suspended or revoked

It is further ORDERED that Sean Hanover shall forthwith give notice, by certified mail, of the suspension of his license to practice law in Virginia to all clients for whom he is currently handling matters and to all opposing attorneys and the presiding judges in pending litigation. The

Attorney shall also make appropriate arrangements for the disposition of matters then in his care in conformity with the wishes of his clients. The Attorney shall give such notice within fourteen (14) days of the effective date of the suspension order, and make such arrangements as are required herein within forty-five (45) days of the effective date of the suspension order. The Attorney shall also furnish proof to the bar within sixty (60) days of the effective date of the suspension order that such notices have been timely given and such arrangements for the disposition of matters made. Issues concerning the adequacy of the notice and arrangements required herein shall be determined by the Disciplinary Board, which may impose a sanction of revocation or suspension for failure to comply with the requirements of this subparagraph.

It is further ORDERED that a copy of the Certification of records, Court Clerk Work Sheets, Probation /Supervision Order, Charge Summary, Statement of Charges, Statement of Probable Cause and Case History be attached to this Rule to Show Cause and Order of Summary Suspension and Hearing and made a part hereof.

It is further ORDERED that an attested copy of this Rule to Show Cause and Order of Summary Suspension and Hearing, with attachments, shall be mailed to Sean Hanover by certified mail at his address of record with the Virginia State Bar, HHC, Inc., 2751 Prosperity Ave., Suite 150, Fairfax, VA 22031, and to Sean Hanover, by regular mail to 6120 Glen Falls Road, Reisterstown, MD 21136, and to Kathleen M. Uston, Assistant Bar Counsel, Virginia State Bar, 1111 East Main Street, Suite 700, Richmond, Virginia 23219-0026.

ENTERED THIS 26th DAY OF OCTOBER, 2018

VIRGINIA STATE BAR DISCIPLINARY BOARD

A COPY TESTE:



VIVIAN R. BYRD

DEPUTY CLERK OF THE DISCIPLINARY SYSTEM



Sandra L. Havrilak, 1st Vice Chair

**STATE OF MARYLAND, BALTIMORE
COUNTY, TO WIT:**

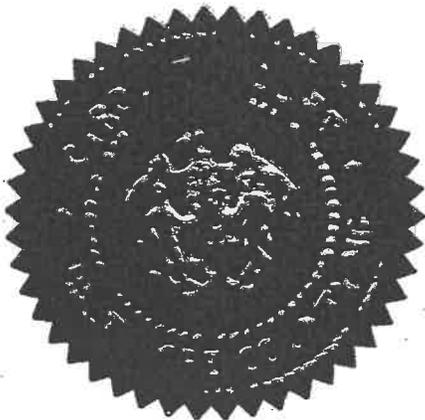
I HEREBY CERTIFY THAT THE AFOREGOING IS A TRUE
PHOTOCOPY OF THE ORIGINAL

Court Clerk's Work Sheet, Probation/Supervision Order, Charge Summary,
Statement of Charges, Statement of Probable Cause and the Case History.

TAKEN FROM THE RECORDS OF THE CIRCUIT COURT FOR

BALTIMORE COUNTY AS RECORDED IN CASE 03-K-17-004477

IN TESTIMONY WHEREOF, I HERETO SET MY HAND
AND AFFIX THE SEAL OF THE CIRCUIT COURT FOR
BALTIMORE COUNTY THIS 25TH DAY OF October 2017



Julie L. Enson



CLERK OF THE CIRCUIT COURT
FOR BALTIMORE COUNTY

DATE: 3rd day of October, 2018

JUDGE Hon. Robert E. Canillo, Jr.

PLAINTIFF: Franka Pilarski

DEF. ATTY: Andrew Alberstein

REPORTER

CS

CLERK

BC

TRIAL: T/T: COURT JURY

NAME Sean Regan Hancock

TYPE: MURDER

CIRCUIT COURT #03-4-17-00577

PLEA: GUILTY

CH 1

DISTRICT COURT #3000452486

NOT GUILTY

TRACKING #17-0001-07258-B

REASON: Plea Hearing

CHARGES: 1.0000 : Child Pornography Promote/Distribute/W/Intent/Possess, 1.0000 : Child Pornography Promote/Distribute/W/Intent/Possess, 1.1256 : Possess Child Pornography

ISSUES:

Defendant's Motion for JUDGMENT OF ACQUITTAL

END OF STATE'S CASE

B. END OF ENTIRE CASE

GRANTED

OVERRULED

GRANTED

OVERRULED

PLEA: GUILTY

NOT GUILTY

CH 1

NO PROB
BAL

DEF. waived rights to a speedy trial 04-2018

TERMS: 10 YRS 5 YRS 30 YRS SUPER PCL

10 YRS 5 YRS
3/16/18 TS
COMET with Addendum
waived waived
within 30 days to clerk

REMARKS:

T/D 10/24/18 Vacated

Supervised contact w/ Relatives under 16yrs

No Contact w/ Children under 16 yrs non relatives

Register Tier II Sex Offender

Court Note: CREDIT TIME PROBATION - DEFENDANT MUST REPORT TO SUPERVISOR AT 1000 AM, 3700 AVENUE, 3700 FLOOR, TUESDAY, MO 61204 IMMEDIATELY

Binding (Range)

700

22000

TLS

CIRCUIT COURT FOR BALTIMORE COUNTY

CHARGE FINDINGS

Case No: K-17-00347
Case Status: Open/Active
Filing Date: 07/15/2017
Assigned Judge: To Be Assigned
District Ct R: BC00452486
Tracking #: 17-0001-07296-2

State of Maryland vs Sean Regan Hanover

Charge Description Finding Tracking

17-0001-07296-2 Child Pornography Produce/Distribute/W/I 17-0001-07296-2

Charge Description

17-0001-07296-2 Child Pornography Produce/Distribute/W/I 17-0001-07296-2

Charge Description

17-0001-07296-2 Child Pornography 17-0001-07296-2

Charge Description

State of Maryland

Case No: K-17-00347
Filing Date: 07/15/2017



CIRCUIT COURT DISTRICT COURT OF MARYLAND FOR Baltimore
City/County

Located at 1101 Besley Ave, 21204 Court Address Case No. K-17-064477

STATE OF MARYLAND vs. Sean Hanover Defendant

SID No. Tracking Number 17-0001-07238-2

(IF AVAILABLE, PLACE LABEL HERE OR AT TOP OF PAGE.)

Convicted Count(s): CT 1 Child Pornography Distribution

Sentence: 10 YRS

Part of Sentence Executed: _____ Suspended: All but time served

Balance of sentence suspended upon admission to treatment pursuant to HG § 8-507

Credit for Time Served: 399 days

PROBATION/SUPERVISION ORDER

Probation Before Judgment (Criminal Procedure Article § 6-220)

IT IS ORDERED THAT the above named Defendant:

- Be Unsupervised
- Be Supervised by: Drinking Driving Monitor Program only Parole and Probation Sexual

Offender Management Team Alternative Community Service: _____

Other: _____

Length of Probation: 5 YRS mo/yr(s) Lifetime Sexual Offender Supervision by Management Team

Probation begins on upon release
 upon admission to residential substance abuse program.

Your first appointment with the supervising agency is w/ln 24 hrs and the place to report to is P+P / Comet Supervision Your failure to report could result in your arrest.

A. Standard Conditions: All Standard Conditions All Standard Conditions except Nos. _____

1. Report as directed and follow your supervising agent's lawful instructions.
2. Work and/or attend school regularly as directed and provide verification to your supervising agent.
3. Get permission from your supervising agent before: changing your home address, changing your job, and/or leaving the State of Maryland.
4. Obey all laws.
5. Notify your supervising agent at once if charged with a criminal offense, including jailable traffic offenses.
6. Get permission from the court before owning, possessing, using, or having under your control any dangerous weapon or firearm of any description.
7. Permit your supervising agent to visit your home.
8. Do not illegally possess, use, or sell any narcotic drug, controlled substance, counterfeit substance, or related paraphernalia.
9. Appear in court when notified to do so.

28000

Probation Department
200 Washington Ave., Ground Floor
TOWSON, MD 21204

Case No. K-17-004477

w/in
30 days

10. Pay all fines, costs, restitution, and fees as ordered by the court or as directed by your supervising agent through a payment schedule.
- Fine(s) of \$ _____ paid through Parole and Probation Clerk's Office Sheriff's Office
 - Court costs of \$ _____ paid through Parole and Probation Clerk's Office
 - Supervision fee of \$50/month paid through Parole and Probation Supervision fee waived
 - Restitution of \$ _____ to _____ paid through Parole and Probation State's Attorney's Office by _____ (Date)
 - Public Defender fees of \$ _____ to the Office of the Public Defender for counsel fees.
 - Pay the following fees through Parole and Probation or _____
 - Victims of Crime Fund \$ _____
 - CICF costs \$ _____
 - Other costs (Specify) \$ _____
 - The Division of Parole and Probation is hereby granted the discretion to refer the collection of funds it is authorized to collect to the State's Central Collection Unit without the need of further court approval.

B. Special Conditions:

- 11. Provide DNA sample as required by law by _____ (Date)
- 12. Submit to and pay for random urinalysis as directed by supervising agent.
- 13. Submit to, successfully complete, and pay required costs for alcohol drug alcohol and drug evaluation testing treatment education, as directed by your supervising agent.
- 14. Attend _____ self-help group meetings per week for _____ weeks. Attendance may be modified by your supervising agent after _____ weeks.
- 15. Attend and successfully complete alcohol drug alcohol and drug treatment education program
- 16. Totally abstain from alcohol, illegal substances, and abusive use of any prescription drug.
- 17. Apply for alcohol restriction on driver's license within 10 days of trial date for _____ year(s)/month(s).
- 18. Refrain from driving and/or attempting to drive after consuming alcohol.
- 19. Attend Victim Impact Panel meetings when notified.
- 20. Attend and successfully complete MVA Driver Improvement Program.
- 21. Have Ignition Interlock installed for _____ months and pay costs. Employment vehicle exempted.
- 22. Submit to evaluation and attend and successfully complete mental health treatment as directed by your supervising agent.
- 23. Attend and successfully complete Special Health Education Program - Project SASOE
- 24. Attend and successfully complete parenting class.

Case No. V-17-004477

25. Complete _____ hours of community service by _____ (Date), under the direction of _____ and pay required fees.

26. Enroll in, pay any required costs for, and successfully complete treatment at _____

27. Attend and successfully complete domestic violence counseling at _____ by _____ (Date) and pay required costs.

28. Have no contact with _____

29. Do not enter or be found near _____

30. Home confinement/detention to _____ for _____ months
 Special conditions (e.g. doctor's appointments, attending classes, etc.) _____

31. Register as sexual offender with the supervising authority under the provisions of Criminal Procedure Article, Title 11, Subtitle 7:

- (1) A Tier I Sex Offender;
- (2) A Tier II Sex Offender; for 25 yrs
- (3) A Tier III Sex Offender;
- (4) A sexually violent predator;
- (5) A Tier I Sex Offender who, before moving into this State, was required to register in another State;
- (6) A Tier II Sex Offender, Tier III Sex Offender, or sexually violent predator who, before moving into this State, was required to register in another State;
- (7) A Tier I, Tier II, Tier III Sex Offender, or a Sex Offender who is required to register in another State, Jurisdiction, a federal, military, or tribal court, or a foreign government, who is not a resident of this State, and who enters this State:
 - (i) To reside or habitually live;
 - (ii) To carry on employment or vocation that is full-time or part-time for a period exceeding 14 days or for an aggregate period exceeding 30 days during a calendar year, whether financially compensated, volunteered, or for the purpose of government or educational benefit; or
 - (iii) To attend a public or private educational institution, including a secondary school, trade or professional institution, or institution of higher education, as a full-time or part-time student.
 - (iv) As a transient with the intent to be in the State for a period exceeding 14 days or an aggregate period exceeding 30 days during the calendar year.

32. Electronic monitoring Electronic monitoring with stay-away alert technology

33. Other no contact w/ children under 16 yrs of age;
supervised contact w/ family members

who are children

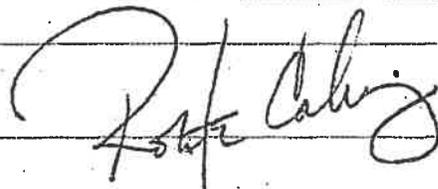
• continued treatment

• no PBS

• Follow all things listed in Addendum

Case No. K-17-4477

- C. 34. Comply with special conditions of lifetime supervision - see form #CC-DC-CR-136.
- D. Recommendations to the supervising agency:
 - 35. Transfer supervision to _____ County/City, State of Maryland
 _____ State under the Interstate Compact
 - 36. Defendant shall keep appointment for HG § 8-505 evaluation and shall immediately enter the recommended program upon admission.
 Defendant shall enter treatment program immediately upon admission.
 Defendant shall successfully complete treatment program and comply with terms of aftercare plan.
 - 37. Other _____

Judge:  Date: 10/3/18

CONSENT

I have read, or have had read to me, the above conditions of probation. I understand these conditions and agree to follow them. I understand that if I do not follow these conditions, I could be returned to court charged with a violation of probation.

If I fail to abide by the above conditions, the court could enter judgment against me and proceed with disposition as if I had not been placed under probation. I have been notified and understand that by consenting to and receiving a stay of judgment under Criminal Procedure Article, § 6-220, I waive my right to appeal from a judgment of guilty by the court in this case.

I understand that my failure to comply with Condition 10 may result in my case being referred to the State's Central Collection Unit, resulting in an additional collection fee as permitted by law.

I understand that Parole and Probation may impose Graduated Sanctions upon me for any technical violation of the above conditions of probation, as authorized pursuant to Correctional Services Article, §§ 6-111 and 6-121.

  10/3/18
Defendant's Signature Date of Birth Date
6120 Glen Falls Rd, Reisterstown MD 21136
Defendant's Address


Witness Signature



DISTRICT COURT OF MARYLAND FOR Baltimore County

Located at 120 E. Chesapeake Avenue, Towson Maryland 21286



Case No. 3C00452686

STATE OF MARYLAND VS. HANOVER, SEAN REGAN

COMPLAINANT:

Officer: REES

Agency/Subagency: AE CID

Officer ID: 4648

6120 GLEN FALLS ROAD
REISTERSTOWN, MD 21136

K17-4477

CC#: 172400312

SID: 0004563437

LID: 452698

DL# [REDACTED] VA

Race: 2 Sex: M

Ht: 5' 11"

Wt: 180

Hair: BRN Eyes: BRN

DOB: [REDACTED]

Phone(H):

Phone(W):

CHARGE SUMMARY

UPON THE FACTS CONTAINED IN THE APPLICATION OF Officer: REES IT IS FORMALLY CHARGED THAT HANOVER, SEAN REGAN at the dates, times and locations specified below:

CHG/CIT	STATUTE	PENALTY	DESCRIPTION OF THE CHARGE
1 0300.	CR 11 207 ((a)(4))	10 Y &/or \$25,000.00	CHILD PORN PROMOTE/DISTRB
1 0300	CR 11 207 ((a)(4))	10 Y &/or \$25,000.00	CHILD PORN PROMOTE/DISTRB
1 1756	CR 11 208	5 Y &/or \$2,500.00	POSSESS CHILD PORNOGRAPHY

CRIMINAL DEPT. OCT 16 2017

Date : 08/29/2017 Time : 6:05 PM

Tracking No. 170001072382

Judicial Officer: _____

8092



DISTRICT COURT OF MARYLAND FOR

Salisbury

(City/County)

LOCATED AT (COURT ADDRESS)

170 E. Chesapeake Ave
21286

DC Case : 3C00452686



RELATED CASES:

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

Hanover, Sean R.



170001072382



170001072382

COMPLAINANT

DEFENDANT

NAME (LAST, FIRST M.I.)

Kees

TITLE

Det

NAME (LAST, FIRST M.I.)

Hanover, Sean Regan

TITLE

AGENCY

ME

SUB-AGENCY

CIB

I.D. NO. (POLICE)

4648

MAFIS NAME (LAST, FIRST, M.I.)

TITLE

WORK TELEPHONE

HOME TELEPHONE

I.D. NO.

RACE

SEX

HT.

WT.

DOB (MM/DD/YY)

452698

W

M

5-11

150

[REDACTED]

ADDRESS

APT. NO.

CO/OCA

HAIR

EYES

OTHER DESCRIPTION

CITY

STATE

ZIP CODE

DRIVER'S LICENSE #

STATE

WORK TELEPHONE

HOME TELEPHONE

ADDRESS

APT. NO.

6170

Glen Falls Rd

CITY

STATE

ZIP CODE

Reisterstown

MD

21136

DOMESTIC VIOLENCE

HATE CRIME

VULNERABLE ADULT ABUSE

CHILD ABUSE

Page 1 of 2

STATEMENT OF CHARGES

IT IS FORMALLY CHARGED THAT THE DEFENDANT

1 | CJIS CODE | AR | ON OR ABOUT (DATE) | AT (PLACE) |
1 | 10300 | 1715322 | 7/31/17 | 6170 Glen Falls Rd 21136

did knowingly distribute child pornography videos depicting minors engaged as subjects in sexual conduct

IN VIOLATION OF:

MD. ANN. CODE ART. 21-207 A4

SEC. _____

COMMON LAW OF MD. _____

PUB. LOCAL LAW ART. _____ SEC. _____

PROBABLE CAUSE

Y N

COMAR OR AGENCY CODE NO. MD0030100

ORDINANCE NO. _____

AGAINST THE PEACE, GOVERNMENT AND DIGNITY OF THE STATE

COMMISSIONER INITIALS

ID NO.

JB 8092

2 | CJIS CODE | AR | ON OR ABOUT (DATE) | AT (PLACE) |
2 | 10300 | 1715322 | 7/31/17-8/29/17 | 6170 Glen Falls Rd 21136

did knowingly possess w/ intent to distribute child pornography files depicting minors engaged as subjects in sexual conduct

IN VIOLATION OF:

MD. ANN. CODE ART. 21-207 A4

SEC. _____

COMMON LAW OF MD. _____

PUB. LOCAL LAW ART. _____ SEC. _____

PROBABLE CAUSE

Y N

COMAR OR AGENCY CODE NO. MD0030100

ORDINANCE NO. _____

AGAINST THE PEACE, GOVERNMENT AND DIGNITY OF THE STATE

COMMISSIONER INITIALS

ID NO.

JB 8092

CONTINUED ON ATTACHED SHEET (FORM DC-CR-002A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF.

DATE: 8/29/17

ISSUING PEACE OFFICER

Death

AGENCY

ME

SUB-AGENCY

CIB

I.D. NO.

4648



170001072382

TR# 170001072382

COURT COPY



DISTRICT COURT OF MARYLAND FOR

Baltimore

LOCATED AT (COURT ADDRESS)
120 E. Chesapeake Ave
21286

DISTRICT COURT
CASE NUMBER

(City/County)
172400312

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

MAFIS NAME

D.O.B.

STATEMENT OF CHARGES (CONTINUED)

Page 2 of 2

IT IS FORMALLY CHARGED THAT THE DEFENDANT

3 | CJS CODE AR ON OR ABOUT (DATE) AT (PLACE)
1756 1715322 8/29/17 Glen Falls Rd 21136
did knowingly possess child pornography files
depicting individuals under 16 years of age engaged in
sexual conduct.

IN VIOLATION OF:
 MD. ANN. CODE ART. CR 11-208 SEC. ; COMMON LAW OF MD.; PUB. LOCAL LAW ART. SEC. PROBABLE CAUSE Y N
 COMAR OR AGENCY CODE NO. MD 0301w ; ORDINANCE NO. AGAINST THE PEACE, GOVERNMENT AND DIGNITY OF THE STATE COMMISSIONER INITIALS JB ID NO 1094

CJS CODE AR ON OR ABOUT (DATE) AT (PLACE)

IN VIOLATION OF:
 MD. ANN. CODE ART. SEC. ; COMMON LAW OF MD.; PUB. LOCAL LAW ART. SEC. PROBABLE CAUSE Y N
 COMAR OR AGENCY CODE NO. ; ORDINANCE NO. AGAINST THE PEACE, GOVERNMENT AND DIGNITY OF THE STATE COMMISSIONER INITIALS ID NO

CJS CODE AR ON OR ABOUT (DATE) AT (PLACE)

IN VIOLATION OF:
 MD. ANN. CODE ART. SEC. ; COMMON LAW OF MD.; PUB. LOCAL LAW ART. SEC. PROBABLE CAUSE Y N
 COMAR OR AGENCY CODE NO. ; ORDINANCE NO. AGAINST THE PEACE, GOVERNMENT AND DIGNITY OF THE STATE COMMISSIONER INITIALS ID NO

CONTINUED ON ATTACHED SHEET (FORM DC-CR-002A)
I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.
DATE 8/29/17 ISSUING PEACE OFFICER [Signature]
AGENCY AE SUBAGENCY CYB I.D. NO. 4648

TRACKING NUMBER



DISTRICT COURT OF MARYLAND FOR BALTIMORE (City / County)

LOCATED AT (COURT ADDRESS)
120 E. CHESAPEAKE AVE., TOWSON, MD 21286

DISTRICT COURT
CASE NUMBER

RELATED CASES:

COMPLAINANT DEFENDANT

Form with fields for Name (Last, First, M.I.), Title, Agency, Sub-Agency, I.D. No. (Police), Work Telephone, Home Telephone, Address, APT. No., City, State, Zipcode, MAFIS Name (Last, First, M.I.), Title, I.D. No., Race, Sex, HT, WT, D.O.B. (MM/DD/YY), Hair, Eyes, Other Description, Driver's License #, State, Work Telephone, Home Telephone, Address, APT. No., City, State, Zip Code.

- DOMESTIC VIOLENCE
VULNERABLE ADULT ABUSE
HATE CRIME
CHILD ABUSE

STATEMENT OF PROBABLE CAUSE

ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

THE DEFENDANT HAS BEEN ARRESTED UPON THE FOLLOWING INFORMATION OR OBSERVATION: (MAKE A PLAIN, CONCISE AND DEFINITIVE STATEMENT OF ESSENTIAL FACTS CONSTITUTING THE OFFENSE CHARGED.)

-- SEE ATTACHED FORM PC DC/CR4A --

CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

PROBABLE CAUSE CHARGES #
LACK OF PROBABLE CAUSE CHARGES #

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.
DATE: 8/29/17
ARRESTING OFFICER: [Signature]
AGENCY: AE
SUB-AGENCY: CIB
I.D. NO.: 4648

I HAVE REVIEWED THE STATEMENT OF CHARGES AND HAVE DETERMINED THAT THERE IS PROBABLE CAUSE TO DETAIN THE DEFENDANT.
THERE IS NOT PROBABLE CAUSE TO DETAIN THE DEFENDANT AND I HAVE ACCORDINGLY RELEASED HIM IN HIS OWN RECOGNIZANCE.
DATE: AUG 29 2017
JUDICIAL OFFICER: [Signature]
COMMISSIONER I.D. NO.: 8092



DISTRICT COURT OF MARYLAND FOR BALTIMORE (City / County)

LOCATED AT (COURT ADDRESS)
120 E. CHESAPEAKE AVE., TOWSON, MD 21286
DISTRICT COURT CASE NUMBER

172400312

DEFENDANT'S NAME (LAST, FIRST, M.I.) HANOVER, SEAN REGAN
MAFIS NAME

STATEMENT OF PROBABLE CAUSE (CONTINUED)

ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

Peer to Peer (P2P) file sharing allows people using P2P software to download and share files with other P2P users using the same or compatible P2P software. P2P software is readily available on the Internet and often free to download. Internet connected devices such as computers, tablets and smartphones running P2P software form a P2P network that allow users on the network to share digital files.

BitTorrent is one of many P2P networks. For a user to become part of the BitTorrent network, the user must first obtain BitTorrent software and install it on a device. When the BitTorrent software is running and the device is connected to the Internet, the user will be able to download files from other users on the network and share files from their device with other BitTorrent users.

Users of the BitTorrent network wishing to share new content will use a BitTorrent program to create a "torrent" file for the file or group of files they wish to share. A torrent file is a small file that contains information about the file(s) and provides a method for a user to download the file(s) referenced in the torrent from other BitTorrent users. Torrent files are typically found as the result of keyword searches on Internet sites that host or link to them. Torrent files may be referenced by their "infohash", which uniquely identifies the torrent based on the file(s) associated with the torrent file.

CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.
DATE 8/29/17 ARRESTING OFFICER [Signature]
AGENCY AE SUB-AGENCY CIB I.D. NO. 4648

TRACKING NUMBER



DISTRICT COURT OF MARYLAND FOR BALTIMORE (City / County)

LOCATED AT (COURT ADDRESS)
120 E. CHESAPEAKE AVE., TOWSON, MD 21286
DISTRICT COURT CASE NUMBER

172400312

DEFENDANT'S NAME (LAST, FIRST, M.I.) HANOVER, SEAN REGAN
MAFIS NAME

STATEMENT OF PROBABLE CAUSE (CONTINUED)
ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

To download file(s) from other users on the BitTorrent network, a user typically obtains a torrent file. The BitTorrent software processes the information in the torrent file and locates devices on the BitTorrent network sharing all or parts or the actual file(s) being sought. The download of the content referenced in the torrent is achieved after the requesting computer and the sharing computer(s) directly connect to each other through the Internet using the BitTorrent software.

On Monday, July 31, 2017, Det. Rees was conducting an online investigation on the BitTorrent network for offenders sharing child pornography. Det. Rees directed my investigative focus to a device at IP address 100.16.139.135, because it was associated with a torrent with the infohash: 29ee272e62062d40732e79b084440593cfc25700. This torrent file references 121 files, at least one of which was identified as being a file of investigative interest to child pornography investigations. Using a computer running investigative BitTorrent software, Det. Rees directly connected to the device at IP address 100.16.139.135, hereinafter referred to as "Suspect Device". The Suspect Device reported it was using BitTorrent client software -BT71000 BitTorrent 7.10

CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.
DATE 8/29/17 ARRESTING OFFICER [Signature]
AGENCY AE SUB-AGENCY CIB I.D. NO. 4648

TRACKING NUMBER



DISTRICT COURT OF MARYLAND FOR BALTIMORE (City / County)

LOCATED AT (COURT ADDRESS)
120 E. CHESAPEAKE AVE., TOWSON, MD 21286
DISTRICT COURT CASE NUMBER

172400312

DEFENDANT'S NAME (LAST, FIRST, M.I.) HANOVER, SEAN REGAN
MAFIS NAME

STATEMENT OF PROBABLE CAUSE (CONTINUED)
ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

On Monday, July 31, 2017, between 0549 hrs and 0849 hrs, Det. Rees successfully completed the download of 100 of the files that the device at IP address 100.16.139.135 was making available. The following are just 3 of those files:

000012.avi

This file is a video that depicts a nude prepubescent female child on a bed. The child appears to be no older than 8 years of age. The child is performing fellatio on the erect penis of an adult male who is lying on the bed. The child is then seen lying on her stomach on the bed using her hands to reach back and spread her buttocks apart. The adult male is seen pressing his erect penis up to the anus and vagina of the young child. The adult male rubs his penis up and down over the child's anus while pressing the tip of his penis into her anus. The child continues to use her hands to spread her buttocks.

CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.
DATE 8/29/17 ARRESTING OFFICER [Signature]
AGENCY AE SUB-AGENCY CIB I.D. NO. 4648

TRACKING NUMBER



DISTRICT COURT OF MARYLAND FOR BALTIMORE (City / County)

LOCATED AT (COURT ADDRESS)
120 E. CHESAPEAKE AVE., TOWSON, MD 21286
DISTRICT COURT CASE NUMBER

172400312

DEFENDANT'S NAME (LAST, FIRST, M.I.)
HANOVER, SEAN REGAN
MAFIS NAME

STATEMENT OF PROBABLE CAUSE (CONTINUED)
ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

000102.mpg
This file is a video that depicts a nude prepubescent female in a bathtub. The child appears to be no older than 5 years of age. The child is seen standing in the bathtub rubbing and touching her vagina and buttocks after an adult male's voice asks the child to show how she cleans herself. The child squats slightly and uses her hands to open her vagina and show it to the camera. An adult male's hand is seen reaching into the camera view and he uses his fingers to fondle and rub the child's vagina. The child is then seen masturbating the adult males erect penis before performing fellatio on him for the remainder of the video. The child is still seen standing in the bathtub while the adult male stands outside of the tub.

000074.mpg
This file is a video that depicts a very young nude prepubescent female child. The child appears to be an infant or toddler. The video begins zoomed in on the child's vagina while an adult male has anal intercourse with the child. The adult male is touching the child's vagina with his hand and says, "Good girl, good baby." The child is heard whimpering and crying. The adult male says, "Quit crying" as he speeds up the rate of anal intercourse. The child cries and screams more and more. The adult male continues sodomizing the child as she cries and screams until he removes his penis from her anus and ejaculates on her leg and vaginal area.

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172400312

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STATEMENT OF PROBABLE CAUSE (CONTINUED)
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Det. Rees recognizes through his training, knowledge, and experience that the files described above are child pornography.

The device at IP Address 100.16.139.135 was the sole candidate for each download, and as such, each files was downloaded directly from this IP Address.

A check of publicly available records located online by an organization known as the American Registry of Internet Numbers, determined that the aforementioned I.P. address was assigned to Verizon. A Grand Jury Subpoena was issued for the IP address 100.16.139.135 for the dates and times the child pornography was downloaded, requesting information, including the subscriber name and address from Verizon. The response received from Verizon is as follows:

Subscriber Name:	Sean Hanover
Service address:	6120 Glen Falls Road Reisterstown, MD 21136
Telephone #:	703-402-2723
Email:	seanhanover@hanoverlawpc.com

CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

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ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

Det. Rees noted the email address on the subscriber records, seanhanover@hanoverlawpc.com. Det. Rees visited the website, http://www.hanoverlawpc.com/, and learned that Sean Hanover is the Principal Attorney of Hanover Law and specializes in criminal defense and immigration law based in Fairfax, VA. Det. Rees also learned from the website that Mr. Hanover also owns and operates an IT consulting company called HHC.

Based on the aforementioned investigation Det. Rees prepared a search and seizure warrant for 6120 Glen Falls Road Reisterstown, MD 21136. The warrant was signed by the Honorable Judge Nagle on 08/18/2017 at 1018 hours.

The valid search and seizure warrant was served on 08/29/2017 at 0450 hours. Entry was gained without force pursuant to Det. Rees knocking and announcing and Sean Hanover answering the door.

The following residents were present during the service of the warrant:

Sean Hanover m/w [redacted]

Charlet Herr-Chowdhury f/w

Danielle Blackwell f/w [redacted]

Jermaine Blackwell-Smith m/b [redacted]

CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

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Form with fields for DATE (8/29/17), ARRESTING OFFICER (signature), AGENCY (AE), SUB-AGENCY (CIB), and I.D. NO. (4648)

TRACKING NUMBER



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STATEMENT OF PROBABLE CAUSE (CONTINUED)
ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS
The following officers were present for the service of the warrant:
Sgt. Smith #4159 (Supervisor)
Det. Rees #4648 (Affiant/Interview)
Det. Kaczynski #3425 (Search/ Interview)
Det. Raut #4438 (Forensics)
Det. Maranto #4913 (Inventory)
Det. Adamski #4657 (Photos/Search)
Det. Maisano #5120 (Sketch/Search)
Lt. Wiedeck #3480 (Security)
Det. Jeunette# 4523 (Search)
Det. Prenger #3328 (Security)
Lt. Peterson #3986
Ofc. Summers #5793

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Once the home was cleared, Ms. Herr-Chowdhury and Ms. Blackwell, along with Ms. Blackwell's son Jermaine, were asked to sit on the couch in the living room.
Mr. Hanover was asked to sit in the third floor bedroom with Lt. Wiedeck.
Det. Rees read the warrant aloud to the residents seated in the living room first. Det. Rees then advised them of their rights per Miranda, which all stated that they understood. Det. Rees asked if they wished to claim any large sums of money or valuables. Ms. Herr-Chowdhury advised that she had gemstones, jewelry, and silver bars in a safe in the 2 nd floor office. She advised that those items could remain there. Det. Rees learned that Danielle Blackwell is the housekeeper employed by Mr. Hanover and Ms. Herr-Chowdhury. Ms. Blackwell and her son reside in the 3 rd floor bedroom. Det. Rees learned that Ms. Herr-Chowdhury is Mr. Hanover's paralegal and works for/with him. She advised that they just bought and moved into their home this summer. She advised that they commute to Fairfax, VA/Washington DC approximately 3 days a week. She advised that they are "partners" (boyfriend/girlfriend) and have been together for approximately 8 years.

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Det. Rees asked the resident's about computers and devices in the home. Ms. Herr-Chowdhury advised that she has a work laptop on the dining room table, an Iphone next to her bed in the bedroom that she shares with Mr. Hanover, and an old tablet in the room off of the kitchen. Ms. Blackwell advised that she has a phone (which she had carried down with her), and RCA tablet in her 3rd floor bedroom and her son, Jermaine, has 2 Kindles and a digital camera.

Ms. Herr-Chowdhury pointed out to Det. Rees that in the 2nd floor office, Mr. Hanover has a desktop computer and a laptop computer. Ms. Herr-Chowdhury advised that she seldom uses the desktop computer.

Det. Rees asked if any of them use any type of file sharing software on their computers or devices. Ms. Herr-Chowdhury denied that she uses file sharing software. Ms. Blackwell advised that she used Limewire many years ago, but currently does not use any file sharing software.

Det. Rees then read the search warrant aloud to Mr. Hanover in the 3rd floor bedroom. Det. Rees then advised Mr. Hanover of his Rights per Miranda, which he stated that he understood. Mr. Hanover stated out loud, "I've just been mirandized." Det. Rees asked Mr. Hanover if he wished to claim any large sums of money or valuables, which he stated that he did not.

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ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

Det. Rees asked Mr. Hanover about the internet in the home. Mr. Hanover advised that their internet service provider is Verizon and that the home has a password protected wireless network. Det. Rees asked Mr. Hanover which computers/devices in the home are his. He advised that the desktop computer and laptop computer in the 2nd floor office are both his. He advised that the laptop computer is his work computer and contains cases that he is working on. He also advised that he has a phone by his side of the bed on the master bedroom. Det. Rees asked Mr. Hanover if he uses any type of file sharing software on his computers/devices. He advised that he uses Bit Torrent on his desktop computer and that he is the only one who does so.

Detectives Rees and Raut conducted a forensic triage on the computers and devices in the home. Det. Raut utilized the forensic triage tool OS Triage to conduct an initial triage of Mr. Hanover's Lenovo desktop computer. The computer was found powered on and running. On the screen the Detectives observed a downloads folder open with what appeared to be torrents/videos of the Anger Management television series. There was also a pop up on the screen that indicated that BitTorrent 7.10, the same software used to share child pornography with Det. Rees, was running. Detectives also noticed an icon on the desktop home screen for the TOR browser. Detectives Rees and Raut know through their training, knowledge, and experience that the TOR browser is commonly used by people who want to

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PC DC/CR 4A (Rev. 3/94)



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DEPENDANT'S NAME (LAST, FIRST, M.I.) HANOVER, SEAN REGAN
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STATEMENT OF PROBABLE CAUSE (CONTINUED)
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access the darkweb under the veil of anonymity. The Detectives know that TOR and the darkweb are widely used for criminal activity, most notably, child pornography activity.

The Detectives also noticed a desktop icon for BitTorrent. The Detectives also noted that the computer was logged into the user profile "hnc" which is the name of the IT consulting company owned by Mr. Hanover.

OS Triage located numerous known child pornography torrents, as well as numerous torrents with titles indicative of child pornography. The following list is a sampling of the torrents OS Triage located:

- !pthc warrior48-6yo girl lick 8yo sister pussy and 14yo br.torrent
!!!!!!!!!!!!(pthc) webcam - 3yo family of4 (mom blows 7yo boy 3yo girl mast)-02.mp4.torrent
!!(pthc pedo) mom & kids - 10yo boy & 12yo girl.avi.torrent
!!(pthc pedo) mom & kids - 10yo boy & 12yo girl.torrent
!!!fuck 10yo preteens pussy play pthc 12yo 10yo.torrent
!!pthc pedoland frifam lollipop - issue4.torrent
(kinderkutje) (pthc) 9yo niece - wideopen.rar.rar.torrent

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DISTRICT COURT OF MARYLAND FOR BALTIMORE (City / County)

LOCATED AT (COURT ADDRESS) 120 E. CHESAPEAKE AVE., TOWSON, MD 21286 DISTRICT COURT CASE NUMBER 172400312

DEFENDANT'S NAME (LAST, FIRST, M.I.) HANOVER, SEAN REGAN MAFIS NAME

STATEMENT OF PROBABLE CAUSE (CONTINUED) ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

(new webcam 2010 pthc ptsc ptnn) smotri prostitutes young girls playing in bed (6yo 7yo 8yo 9yo)(26mins).rar.torrent
(pthc lolifuck) kimmy , veronika family all 2 - veronika (9yo) & her sister annia (12yo) with dad & brother (14yo).avi.1.torrent
(pthc) 4yo 8yo 11yo girls compilation (search words - pthc babyj hussyfan kleuterkutje cbaby .mpg.rar.torrent
(pthc) 6yo and 8yo lesbians suck each other and then dad fucks them both.avi.torrent
(pthc.falko).pedofamily.01.-.mum.aunt.&.kiddy.suck.cock.(2011).rar.torrent
10 yo xxx young preteen pictures pthc.torrent
4yo pthc r@ygold real!!.mpg.torrent
9yo jenny full.torrent
kait 5yo clit, 'gina, asshole, scat, cum.wmv.torrent
ltv46 pthc 2012 -- best of 2010-2011 compilation vol. 1
(caligvla,11yo,12yo,10yo,kids,pedo,r@ygol.wmv.2.torrent
pedo - 8yo girl suck 8yo boy dick pthc 1yo 2yo 3yo 4yo 5yo 6yo 7yo 8yo 9yo 10yo 11yo 12yo hussyfan
qqaazz lsm lsbar ls- avi .rar.1.torrent
pedo.kiddy.fuck.search.for.kidzilla.rar.torrent
preteen girls nude pthc lolita underage real!.torrent

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pedomom + 8yo daughter lick vib.avi.torrent
pthc - family fun pedo 2 8yo boy's little (mom sex kiddie's.torrent
pthc pedoland frifam 9yo peggy swallow cum.mpg.torrent

OS Triage also located videos saved in the Downloads folder, including the following video:

stickam webcam - tina.avi

This video depicts what appears to be a teenage girl on what appears to be a webcam. The girl is seen touching and rubbing her exposed breasts. As the movie progresses a young clothed boy is seen walking into the room. The young boy is seen pulling his pants down and exposing his buttocks to the camera. The camera then zooms in on the prepubescent male child's penis, which is pulled out of his pants. The child is seen touching his penis. While zoomed in very close on the child's penis, a hand is seen reaching in and touching/fondling his penis, possibly the hand of the teenage girl.

Det. Rees recognized this video to be child pornography.

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It should be noted that a forensic triage is not a full examination of the computer/digital media device and as such, does not exactly indicate how many files of child pornography are currently saved or have been saved on the computer/digital media device.

Detectives Rees and Kaczynski then interviewed Ms. Herr-Chowdhury in private in the master bedroom. The interview was audibly recorded. Det. Rees advised Ms. Herr-Chowdhury of her Rights per Miranda for a second time. Again, she stated that she understood her rights. Ms. Herr-Chowdhury denied, again, that she uses file sharing software. She advised that the desktop computer in the 2nd floor office used to be her computer in their law office. She advised that approximately 1 to 1 1/2 years ago Mr. Hanover wiped that computer, reinstalled the operating system, and brought the computer home to use. Ms. Herr-Chowdhury advised that she does sometimes use that computer, but just to check email for work. Ms. Herr-Chowdhury denied that she has ever seen child pornography on the computers in the home. Ms. Herr-Chowdhury explained that her adult children had visited the home this summer, however they did not use the desktop computer.

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Detectives Rees and Kaczynski then interviewed Ms. Blackwell in private in the master bedroom. The interview was audibly recorded. Det. Rees advised Ms. Blackwell of her Rights per Miranda for a second time. Again, she stated that she understood her rights. Ms. Blackwell denied that she has ever used Mr. Hanover's desktop computer. She denied that she has ever seen child pornography.

Detectives Rees and Kaczynski then interviewed Mr. Hanover in private in the master bedroom. The interview was audibly recorded. Det. Rees advised Mr. Hanover of his Rights per Miranda for a second time. Again, he stated that he understood her rights. Mr. Hanover admitted to using BitTorrent for approximately 6 months to a year. He advised that no one else uses BitTorrent on his desktop computer. Mr. Hanover was asked what his understanding of BitTorrent is as it relates to where files come from, etc. He described it as a peer to peer network sharing system and acknowledged that he knows files are coming to/from other peers on the network. Mr. Hanover admitted that he uses BitTorrent to download movies, Anger Management (television series), and porn. He acknowledged that he has downloaded bestiality porn, skat and piss porn, and Stikam porn. Det. Rees asked Mr. Hanover if he ever sees any of his files on BitTorrent "seeding." He advised that he has. Det. Rees asked Mr. Hanover what "seeding" means. He advised that he knows that it means that he is a source (for sharing files).

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Det. Rees asked Mr. Hanover about PTHC. Mr. Hanover advised that he is familiar with that from some of his clients that he has represented. He stated that it means "Preteen hardcore." Det. Rees knows through his training, knowledge, and experience that PTHC is one of the most prolific child pornography search terms.

Det. Rees talked with Mr. Hanover about the OS Triage results of his desktop computer. Mr. Hanover advised that he has defended clients in child pornography cases. He advised that the last one that involved torrents was about 6 months ago. Det. Rees asked Mr. Hanover if he was familiar with the tool OS Triage or if he was familiar with what hashes are or known hashes of child pornography are. He advised that he was not familiar with these things, which appeared to be odd to Det. Rees for someone who has defended child pornography cases. Det. Rees showed Mr. Hanover the numerous results of known child pornography torrent hashes that were found on his desktop computer. Mr. Hanover denied involvement with child pornography. Mr. Hanover was asked if maybe Ms. Herr-Chowdhury was responsible for the child pornography activity on his desktop computer. He replied, "Hell no. I will take the hit. No way it was her." He was then asked if maybe it was her children or his children, to which he replied, "No." He advised that there is no one else that he is aware of that would use his desktop computer or his BitTorrent.

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STATEMENT OF PROBABLE CAUSE (CONTINUED)

ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

When Det. Rees confronted Mr. Hanover with the fact that he shared child pornography videos with Det. Rees, Mr. Hanover laughed and told Det. Rees he shouldn't collect child pornography because you'll get a knock at 5 a.m.

Det. Rees asked Mr. Hanover if he has ever seen child pornography through the legal discovery process through the government or a prosecutor's office or in evidence presented by the government or a prosecutor's office. He advised that he had not. However, he advised that he has viewed child pornography in his work as an attorney.

Det. Rees learned from Mr. Hanover that his IT company has a contract with the Pentagon and he holds a secret clearance.

Det. Rees clarified, again, with Mr. Hanover that there is no one else who uses his computer. He stated, "Not to my knowledge."

This was a summary of the recorded interviews. Refer to the recordings for full details.

CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

DATE 8/29/17	ARRESTING OFFICER <i>[Signature]</i>
AGENCY AE	SUB-AGENCY CIB
	I.D. NO. 4648

TRACKING NUMBER

PC DC/CR 4A (Rev. 3/94)



DISTRICT COURT OF MARYLAND FOR BALTIMORE (City / County)

LOCATED AT (COURT ADDRESS)
120 E. CHESAPEAKE AVE., TOWSON, MD 21286
DISTRICT COURT CASE NUMBER

172400312

DEFENDANT'S NAME (LAST, FIRST, M.I.) HANOVER, SEAN REGAN
MAFIS NAME

STATEMENT OF PROBABLE CAUSE (CONTINUED)
ARREST ON TRAFFIC / NATURAL RESOURCES / MASS TRANSIT CITATIONS / CRIMINAL CHARGES / MUNICIPAL ORDINANCES / PUBLIC LOCAL LAWS

There was no evidence of child pornography activity/history on any of the other computers/devices used and/or owned by the other people in the home.

Sean Hanover was placed under arrest and transported to Precinct 3 for processing.

Det. Rees knows through, his training, knowledge, and experience that this investigation would not have been possible had it not been for Sean Hanover possessing child pornography files, making them available to be shared, and sharing them on the BitTorrent network. Det. Rees knows that file sharing software is inherently designed to share files and that users of file sharing software have to agree to certain conditions and terms during the installation of the software in order to utilize it.

All events occurred in Baltimore County, Maryland.

CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.
DATE 8/29/17 ARRESTING OFFICER [Signature]
AGENCY AE SUB-AGENCY CIB I.D. NO. 4648

TRACKING NUMBER

CIRCUIT COURT FOR BALTIMORE COUNTY
 Julie L. Ensor
 Clerk of the Circuit Court
 County Courts Building
 401 Bosley Avenue
 P.O. Box 6754
 Towson, MD 21285-6754
 (410)-887-2601, TTY for Deaf: (800)-735-2258
 Maryland Toll Free Number (800) 938-5802

10/25/18

Case Number: 03-K-17-004477 IN CP
 Date Filed: 09/18/2017
 180 Day End: 04/14/18 Text: DONE
 Status: Closed/Inactive
 Judge Assigned: To Be Assigned,
 Arrest Tracking Numbers: 17-0001-07238-2
 Location :
 CTS Start : 10/16/17 Target : 04/14/18

State of Maryland vs Sean Regan Hanover

C A S E H I S T O R Y

OTHER REFERENCE NUMBERS

Description	Number
Arrest Tracking Number	17-0001-07238-2
Central Criminal Number	172400312
District Court Number	3C00452686
Case Folder ID	K17004477V01

INVOLVED PARTIES

Type Num	Name(Last,First,Mid,Title)	Addr Str/End	Pty. Disp. Addr Update	Entered
PLT	001 State Of Maryland			09/18/17
		Party ID: 0000012		
	Mail: 401 Bosley Avenue Towson, MD 21204-4420	08/06/02	08/06/02 SC	08/06/02 SC
	Attorney: 0810022 Pilarski, Francis Baltimore County State's Attorney 401 Bosley Avenue Towson, MD 21204 (410)887-6610		Appear: 10/02/2017	10/02/17

Type Num	Name(Last,First,Mid,Title)	Addr Str/End	Pty. Disp. Addr Update	Entered
DEF 001	Hanover, Sean Regan			09/18/17
		Party ID: 2392540		
	Mail: 6120 Glen Falls Road Reisterstown, MD 21136	09/18/17		09/18/17 JAM
	Attorney: 0001237 Alperstein, Andrew Ira Alperstein & Diener, P.A. 201 North Charles Street Ste 2000 Baltimore, MD 21201 (410)685-0990	Appear: 11/02/2017		11/03/17

CALENDAR EVENTS

Date	Time	Fac	Event Description	Text SA	Jdg	Day	Of Notice	User ID
Result	ResultDt	By Result	Judge	Rec				
10/16/17	09:15A	CR18	Arraignment/Initial Appearance Held/Concluded		RZC	01 /01	09/26/17	NAH JRM
			10/16/17 E R.Cahill, Jr.	Y				
			Stenographer(s): Court Smart					
11/06/17	09:15A	KDD	Arraignment/Initial Appearance		TBA	01 /01	10/16/17	NAH KMF
			Cancelled/Vacated				11/03/17 E	
03/05/18	09:30A	CR18	Postponement Hearing Held/Concluded		RZC	01 /01		NA KET
			03/05/18 E R.Cahill, Jr.	Y				
			Stenographer(s): Court Smart					
03/21/18	09:15A	KDC	Criminal Court Trial		TBA	01 /01	12/01/17	NAH NAH
			Cancelled/Vacated				12/07/17 U	
03/27/18	09:15A	KDC	Criminal Court Trial		TBA	01 /01	12/07/17	NAH KET
			Postponed				03/05/18 M R.Cahill, Jr.	
07/16/18	09:15A	CR05	Criminal Court Trial		HPS	01 /01	03/05/18	SKC MG
			Postponed				07/16/18 D R.Cahill, Jr.	
09/12/18	01:30P	KPL	Plea Hearing		TBA	01 /01		NAH NAH
			Cancelled/Vacated				08/22/18 E	
10/03/18	01:30P	CR18	Plea Hearing Held/Concluded		RZC	01 /01		NAH BC
			10/03/18 E R.Cahill, Jr.	Y				
			Stenographer(s): Court Smart					
10/24/18	09:15A	KDC	Criminal Court Trial		TBA	01 /01	07/16/18	LCS BC
			Cancelled/Vacated				10/03/18 E R.Cahill, Jr.	

COUNTS AND SENTENCING

Count	Ver	Reas	Amd	Off/Amd Date	ATN	CJIS	Statute	Class	Disp	Disp Date	Stg	Plea	Plea Date	Vrd	Vrd Date	Judge
01	0	Q		07/31/17	17-0001-07238-2	1	0300 CR.11.207.(a)(4)	F	G	10/03/18	SF	G	10/03/18	G	10/03/18	RZC *
Child Pornography Promote/Distribute/W/Intent/Possess																

Jail

Life	Start Date	Years	Months	Days	Hours
Death	08/30/17	Sentence	10		
		Suspended	10		
		UnSuspended			

Text: Time served.
The defendant is eligible for parole.

Probation

Supervised	UnSupervised	Supervising Agency							
Years	Months	Days	Hours	Years	Months	Days	Hours	Supervising Agency	
005	000	000	000	000	000	000	000	000	Division of Parole and Probation

Text: COMET Supervision with Addendum to Probation Order. Fines waived. Costs within 30 days to Clerk. Supervision fee waived. Supervised contact with relatives under 16 years old. No Contact with children under 16 years old non relatives. Register Tier II Sex Offender.

Count	Ver	Reas	Amd	Off/Amd Date	ATN	CJIS	Statute	Class	Disp	Disp Date	Stg	Plea	Plea Date	Vrd	Vrd Date	Judge
02	0	0		07/31/17	17-0001-07238-2	1	0300 CR.11.207.(a)(4)	F	NP	10/03/18	SF					RZC *
Child Pornography Promote/Distribute/W/Intent/Possess																
03	0	0		07/31/17	17-0001-07238-2	1	1756 CR.11.208	M	NP	10/03/18	SF					RZC *
Possess Child Pornography.																

SENTENCING NET TOTALS

Jail	Probation	Fine and CWS
Serve Years: 0000	Years: 0005	Total Fine Amount: 0.00
Serve Months: 000	Months: 000	Fine Due Date:
Serve Days: 000	Days: 000	CWS Hours: 0000
Serve Hours: 000	Hours: 000	CWS In Lieu Amount: 0.00
Credit Days: 0399		CWS Complete By:

JUDGE HISTORY

JUDGE ASSIGNED	Type	Assign Date	Removal	RSN
TBA To Be Assigned.	J	09/18/17		

DOCUMENT TRACKING

Num/Seq	Description	Filed	Entered	Party	Jdg Ruling	Closed	User ID
00001000	Criminal Indictment	09/18/17	09/18/17	000	TBA	10/03/18	JAM TS
00002000	State's Notice of Candidate for Sexual Offence Notification Act.	10/02/17	10/02/17	000	TBA	10/03/18	KMF TS
00003000	Attorney Appearance Francis Pilarski	10/02/17	10/02/17	PLT001	TBA	10/02/17	KMI
00004000	Bail Bond Set	10/16/17	10/16/17	DEF001	TBA	10/16/17	CBM
00005000	Bail Bond Posted	10/16/17	10/16/17	DEF001	TBA	10/16/17	CBM
00006000	Defendant Appeared Without Counsel Advised Rights MD Rules 4-215 & 4-242 Public Defender Referral/Application REFUSED by Defendant in open court.	10/16/17	10/16/17	000	RZC	10/16/17	JRM
00007000	Defendant Served in Open Court - not chargeable	10/16/17	10/16/17	000	TBA	10/16/17	JRM
00008000	Motion to Extend Time - Discovery	10/16/17	10/17/17	PLT001	TBA	10/17/17	JRM JRM
00008001	Order to Appear and Extend Time for Discovery	10/16/17	10/17/17	000	RZC	10/03/18	JRM TS
00009000	Defense Attorney Appearance Filed Andrew I Alperstein	11/02/17	11/03/17	DEF001	TBA	11/03/17	KMF
00010000	Motion for Speedy Trial* Filed by Attorney: Andrew Ira Alperstein Esq	11/02/17	11/03/17	DEF001	TBA	11/02/17	KMF
00011000	Request Discovery/Motion Produce Docs* Filed by Attorney: Andrew Ira Alperstein Esq	11/02/17	11/03/17	DEF001	TBA	10/03/18	KMF TS

Num/Seq	Description	Filed	Entered	Party	Jdg Ruling	Closed	User ID
00012000	Motion Pursuant to MD rule 4-252* Filed by Attorney: Andrew Ira Alperstein Esq	11/02/17	11/03/17	DEF001	TBA	11/02/17	KMF
00013000	Motion to Suppress Evidence* Filed by Attorney: Andrew Ira Alperstein Esq	11/02/17	11/03/17	DEF001	TBA	10/03/18	KMF TS
00014000	Request for Hearing in Advance of Trial* Filed by Attorney: Andrew Ira Alperstein Esq	11/02/17	11/03/17	DEF001	TBA	10/03/18	KMF TS
00015000	Defendant's Discovery Disclosure Pursuant to Maryland Rule 4-263* Filed by Attorney: Andrew Ira Alperstein Esq	11/02/17	11/03/17	DEF001	TBA	10/03/18	KMF TS
00016000	Hearing scheduled for 3/21/17 vacated - entered in error	12/07/17	12/07/17	000	TBA	12/07/17	NAH
00017000	State's Discovery Pursuant to Rule 4-263	12/14/17	12/18/17	PLT001	TBA	12/14/17	JB
00018000	Supplemental Discovery	01/05/18	01/11/18	PLT001	TBA	10/03/18	JM TS
00019000	Open Court Proceedings March 5, 2018. Hon. Robert E. Cahill Jr. Joint request for postponement-granted. Forensics not complete. Also Defendant has evaluations. Case to be reset for July 16, 2018.	03/05/18	03/05/18	000	RZC	10/03/18	KET TS
00020000	Waiver of Hick's Rule	03/05/18	03/05/18	000	RZC	10/03/18	KET TS
00021000	Defendant Served in Open Court - not chargeable	03/05/18	03/05/18	000	RZC	03/05/18	KET
00022000	Supplemental Discovery	03/16/18	03/17/18	PLT001	TBA	10/03/18	JM TS
00023000	Defendant's Motion to Modify Pre-Trial Release Conditions* Filed by Attorney: Andrew Ira Alperstein Esq	04/06/18	04/12/18	000	TBA	04/19/18	JLP ES
00023001	Criminal Order (Motion to Modify Pre-Trial Release Conditions)	04/19/18	04/19/18	000	RZC Denied	04/19/18	ES
00024000	Open Court Proceedings July 16, 2018. Hon. Robert E. Cahill, Jr. State's request for postponement of trial-granted. Full forensics not completed-State turned over interview disc, which assistant state's attorney believed had previously been sent. New trial date: 10/24/18. Pre-trial release order amended to allow four (4) hours personal time per week. Case to be reset for trial October 24, 2018.	07/16/18	07/16/18	000	RZC	10/03/18	MG TS
00025000	Defendant Served in Open Court - not chargeable Criminal Court Trial: October 24, 2018	07/16/18	07/16/18	000	TBA	07/16/18	MG

Num/Seq	Description	Filed	Entered	Party	Jdg Ruling	Closed	User ID
00026000	Plea Hearing scheduled for 9/12/18 vacated and reset to 10/3/18 per request of counsel.	08/22/18	08/22/18	000	TBA	08/22/18	NAH
00027000	Open Court Proceedings October 3, 2018. Hon. Robert E. Cahill, Jr. Hearing had in re: Plea. Jury Trial waived. Case submitted on an agreed statement of facts. Trial date 10/24/18 vacated. (Pilarski/Alperstein)	10/03/18	10/05/18	000	RZC	10/03/18	BC TS
00028000	Order for Probation	10/03/18	10/05/18	000	RZC	10/03/18	BC
00029000	Addendum to Probation Order	10/03/18	10/05/18	000	RZC	10/03/18	BC
00030000	Notice of Post-Trial Rights	10/03/18	10/05/18	000	RZC	10/03/18	BC TS
00031000	Bail Bond Released	10/09/18	10/09/18	DEF001	TBA	10/09/18	TS
00032000	Case Reviewed for Audit Purposes	10/09/18	10/09/18	000	TBA		TS
00033000	Maryland Sentencing Guidelines Worksheet	10/03/18	10/18/18	000	RZC		JMS

SERVICE

Form Name	Issued	Hearing	Served	Returned Agency
CR-Summons for Arraignment DEF001 Hanover, Sean Served in court JRM	09/26/17	10/16/17	10/16/17	Baltimore County Sheriff
CR-Summons for Motions/Trials DEF001 Hanover, Sean	10/16/17	11/06/17		
CR-Summons for Motions/Trials DEF001 Hanover, Sean	12/01/17	03/21/18		
CR-Summons for Motions/Trials DEF001 Hanover, Sean	12/07/17	03/27/18		
CR-Summons for Motions/Trials DEF001 Hanover, Sean defendant served with summons in open court	03/05/18	07/16/18	03/05/18	Baltimore County Sheriff
CR-Summons for Motions/Trials DEF001 Hanover, Sean deft served w/ sumps in open ct.	07/16/18	10/24/18	07/16/18	Baltimore County Sheriff

TICKLE

Code Tickle Name	Status Expires	#Days	AutoExpire	GoAhead	From Type	Num Seq
HKTR Hicks Rule Tickle	CANCEL 04/14/18	180	no	no		0 000
SLTR Set List For Trial	CANCEL 03/05/18	0	yes	no	CRTR S	0 000
SLTR Set List For Trial	CANCEL 07/16/18	0	yes	no	CRTR S	0 000

BAILBOND

Party	Type	Amount	Date	Cash Minimum	Date	Status
PostingType		Amount	Date	Remitter	TotalPosted	
DEF001	PR	\$0.00		\$0.00	10/09/18	RELEASED
DEF001	PR	\$0.00		\$0.00	08/31/17	SET
DEF001	PR	\$0.00		\$0.00	08/31/17	POSTED
BOND POSTINGS						
PR		\$0.00	08/31/17	DEF001	\$0.00	

ACCOUNTING SUMMARY

NON-INVOICED OBLIGATIONS AND PAYMENTS

Date	Rcpt/Initials	Acct Desc	Oblig	Payment	Total MOP	Balance
09/18/17		1550 CR-App. Fee	10.00	.00	10.00	10.00
09/18/17		1143 CR-Clerk Fee	80.00	.00	80.00	90.00
09/18/17		1150 CR-VOC	22.50	.00	22.50	112.50
09/18/17		1145 CR-CIC	20.00	.00	20.00	132.50
09/18/17		1154 CR-VWPR	2.50	.00	2.50	135.00
10/02/17		1500 Appearance F	10.00	.00	10.00	145.00
10/03/18	201800031609/ES	1145 CR-CIC	.00	20.00	-20.00 CC	125.00
10/03/18	201800031609/ES	1143 CR-Clerk Fee	.00	80.00	-80.00 CC	45.00
10/03/18	201800031609/ES	1150 CR-VOC	.00	22.50	-22.50 CC	22.50
10/03/18	201800031609/ES	1154 CR-VWPR	.00	2.50	-2.50 CC	20.00
10/03/18	201800031609/ES	1500 Appearance F	.00	10.00	-10.00 CC	10.00
10/03/18	201800031609/ES	1550 CR-App. Fee	.00	10.00	-10.00 CC	.00