[redacted]

CR-13

No. 89cr6997 **CRIMINAL** Docket No.

89CR06997

CIRCUIT COURT FOR BALTIMORE COUNTY

No. 89CR6997

STATE OF MARYLAND ATTY.

Vs

No.

PAUL HOWARD INSKEEP, SR.
JAIL

Nancy Cohen
PD

CHARGE	12/6/89 FIRST DEGREE RAPE, ETC. IF
ARRAIGNED	JUDGE
TRIAL	JUDGE
PLEA	VERDICT
SENTENCE	
REPORTER	STATES ATTY.

DATE	CLERK'S MEMORANDUM	NO.
12/13/89	Hon. JYT # Info. avail to Court ind. P/D's Off. will ent. app. Drem BCDC	

STATE OF MARYLAND, BALTIMORE COUNTY, TO WIT:

The State of Maryland vs PAUL HOWARD INSKEEP, SR.

charged with the crime of Rape 1st degree, etc.

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY

CRIMINAL INFORMATION

The above entitled case having been referred to Sandra A. O'Connor, State's Attorney for Baltimore County, and the said State's Attorney for Baltimore County having fully investigated said case after it had been referred to her as aforesaid, now comes into said Court and for and on behalf of the State of Maryland gives the Court here to understand and be informed that PAUL HOWARD INSKEEP, SR. late of Baltimore County aforesaid, on the 1st day of August, in the year of our Lord nineteen hundred and eighty-five at Baltimore County aforesaid, did unlawfully commit a rape upon Robin Hovermale Mouring in violation of Art. 27, Sec. 462, of the Annotated Code of Maryland; contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State. (Rape - 1st degree - Art. 27, Sec. 462)

SECOND COUNT

And the State's Attorney aforesaid, with power and authority as aforesaid, gives the Court here to understand further that the said PAUL HOWARD INSKEEP, SR. on the said day, in the said year, in the County aforesaid, did unlawfully commit a rape upon Robin Hovermale Mouring in violation of Art. 27, Sec. 463, of the Annotated Code of Maryland; contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.
(Rape - 2nd degree - Art. 27, Sec. 463)

THIRD COUNT

And the State's Attorney aforesaid, with power and authority as aforesaid, gives the Court here to understand further that the said PAUL HOWARD INSKEEP, SR. on the said day, in the said year, in the County aforesaid, did unlawfully commit a sexual offense upon Robin Hovermale Mouring in violation of Art. 27, Sec. 464B, of the Annotated Code of Maryland; contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.
(Sexual Offense - 3rd degree - Art. 27, Sec. 464B)

FOURTH COUNT

And the State's Attorney aforesaid, with power and authority as aforesaid, gives the Court here to understand further that the said PAUL HOWARD INSKEEP, SR. on the said day, in the said year, in the County aforesaid, did unlawfully commit a sexual offense upon Robin Hovermale Mouring, in violation of Art. 27, Sec. 464C, of the Annotated Code of Maryland; contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.
(Sexual offense - 4th Degree - Art. 27, Sec. 464C)

FIFTH COUNT

And the State's Attorney aforesaid, with power and authority as aforesaid, gives the Court here to understand further that the said PAUL HOWARD INSKEEP, SR. on the said day, in the said year, in the County aforesaid, feloniously committed burglary, in the night time, of the dwelling of Robin Hovermale Mouring, situated 425 Crifield Rd., 21220; contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.
(Burglary - common law and Art. 27, Secs. 29, 30, 31)

SIXTH COUNT

And the State's Attorney aforesaid, with power and authority as aforesaid, gives the Court here to understand further that the said PAUL HOWARD INSKEEP, SR. on the said day, in the said year, in the County aforesaid, unlawfully did make an assault upon Robin Hovermale Mouring; against the peace, government and dignity of the State.
(Assault - common law)

SEVENTH COUNT

And the State's Attorney aforesaid, with power and authority as aforesaid, gives the Court here to understand further that the said PAUL HOWARD INSKEEP, SR. on the said day, in the said year, in the County aforesaid, unlawfully did batter Robin Hovermale Mouring; against the peace, government and dignity of the State.
(Battery - common law)

TO THE PERSON CHARGED:

1. This paper charges you with committing a crime.
2. If you have been arrested, you have the right to have a judicial officer decide whether you should be released from jail until your trial.
3. You have the right to have a lawyer.
4. A lawyer can be helpful to you by:
   (A) explaining the charges in this paper;
   (B) telling you the possible penalties;
   (C) helping you at trial;
   (D) helping you protect your constitutional rights; and
   (E) helping you to get a fair penalty if convicted.
5. Even if you plan to plead guilty, a lawyer can be helpful.
6. If you want a lawyer but do not have the money to hire one, the Public Defender may provide a lawyer for you. The court clerk will tell you how to contact the Public Defender.
7. If you want a lawyer but you cannot get one and the Public Defender will not provide one for you, contact the Court Clerk as soon as possible.
8. DO NOT WAIT UNTIL THE DATE OF YOUR TRIAL TO GET A LAWYER. If you do not have a lawyer before the trial date, you may have to go to trial without one.

Sandra O'Connor

THE STATE'S ATTORNEY FOR BALTIMORE COUNTY

6DL

89CR6997

STATE OF MARYLAND

VS

PAUL HOWARD INSKEEP, SR. (Baltimore County Detention Center)

BCI#87663 DOB 4-8-43

ADDRESS: 1911 Robinwood Rd., 21222

STATEMENT OF CHARGES: 665693C0

OFFENSE REPORT NO. E561783

CHARGE: First Degree rape, etc.

CRIMINAL INFORMATION

WITNESSES:

Robin Denise Hovermale Mouring

Anthony Mouring

5660 Leiden Rd., 21206

Det. D. Einolf #1600

Off. D. Iser #2304

Headquarters, 400 Kenilworth Drive, 21204

Off. R. Kavanaugh #1239

PC#11

Det. Karen Gentry #2514

Sex Crimes

Dr. Wilkensen

Franklin Square Hospital

9000 Franklin Square Drive, 21237

FILED DEC 6 [illegible]

STATE OF MARYLAND * IN THE CIRCUIT COURT

V. * FOR BALTIMORE COUNTY

Paul Howard Inskeep *

* *

STATE'S AUTOMATIC DISCOVERY
AND REQUEST FOR DISCOVERY

Now comes Sandra A. O'Connor, State's Attorney for Baltimore County, and Michael A. Pulver , Assistant State's Attorney, and in compliance with Rule 4-263(a) of the Maryland Rules of Procedure, say the following:

1. Any information known to the State at this time which tends to negate the guilt of the Defendant as to the offense charged or which tends to reduce his punishment therefore is attached hereto. If no such attachment is included, no such information is known to the State at this time.

2. Any relevant material or information regarding whether the State used a search and seizure, wire tape or eavesdrop in gathering evidence in this case is attached hereto.

3. /X/ The Defendant made no statements or confessions, oral or written, which are known to the State at the present time.

/___/ The Defendant made a written statement or confession, the copy of which is attached hereto.

/___/ The Defendant made an oral statement or confession, the substance of which is as follows:

4. /___/ The Defendant has not, at this time, been identified by a pre-trial identification procedure.

/X/ The Defendant was identified (at lineup/by photograph/ other _____) by the following witnesses:

(Name) (Date)

Robin Hovermale 6/18/86

5. Upon notice to the State, the Defendant may inspect the contents of the State's file in this case, excluding those items otherwise privileged by law.

The State requests that the following discovery be provided by the Defendant in accordance with Rule 4-263(d):

1. That the State be allowed to inspect and copy all written reports made in connection with this case by each expert which the Defendant intends to call as a witness at trial and that the Defendant furnish the State with the substance of any oral report and conclusion made in connection with this case by an expert the Defendant intends to use at trial.

2. That the Defendant furnish the State with the name and address of any alibi witness the Defendant intends to call as a witness. The crime occurred on the 16th day of August 1985 at 0110 hours at 425 Crisfield Rd. 21220 Baltimore County Maryland.

3. Upon request of the State, the defendant shall:

(a) Appear in a line-up for identification;
(b) Speak for identification;
(c) Be fingerprinted;
(d) Pose for photographs not involving reenactment of a scene;
(e) Try on articles of clothing;
(f) Permit the taking of specimens of material under his fingernails;
(g) Permit the taking from his body of samples of blood, hair and other material involving no unreasonable intrusion upon his person;
(h) Provide specimens of his handwriting;
(i) Submit to reasonable physical or mental examination;

as provided for in Rule 4-263(d).

Sandra A. O'Connor

SANDRA A. O'CONNOR
State's Attorney for Baltimore County

Assistant State's Attorney

I HEREBY CERTIFY that a copy of this aforegoing State's Automatic Discovery and Request for Discovery was attached to the above indictment when delivered to the Defendant.

Assistant State's Attorney

89-997-7000

Arraiga 12/13

WRIT OF HABEAS CORPUS

CIRCUIT COURT FOR BALTIMORE COUNTY

State of Maryland vs. Paul Howard Inskeep SR Case No. 89CR6997

I. D. NO.

State of Maryland, Baltimore County to wit: D.O.B. April 8, 1943

TO: Warden; Baltimore County Det. Center
Kenilworth + Bosley Ave.
Baltimore, MD 21204

ou are hereby COMMANDED TO HAVE before the Judges of the Circuit Court for Baltimore County, County Courts Building, 401 Bosley Avenue, Towson, Maryland, on December 13, 1989 at 09:15 A.M. the body of Paul Howard Inskeep SR for ARRAIGNMENT, unless your counsel enters an appearance in writing on or before the time specified in this writ.

Witness the Honorable Chief Judge of the Third Judicial Circuit of Maryland.

Issued: December 8, 1989

SUZANNE MENSH
Clerk, Circuit Court for Baltimore County

Per _____ Deputy

RETURN OF SERVICE

DATE DEFENDANT SERVED WITH WRIT & CHARGING DOCUMENT: _____

DATE SERVICE NOT MADE: _____

REASON: _____

_____
SIGNATURE & TITLE

L-101

CIRCUIT COURT FOR BALTIMORE COUNTY

Towson, Maryland 21204

District Court Case No. _____

Case No. 89CR6997, 6998, 6999, 7000

12/13, 19 89

REPORT OF PRISONER BROUGHT TO COURT FOR TRIAL

FROM: SUZANNE MENSH, Clerk

TO: THE SHERIFF OF BALTIMORE COUNTY, MARYLAND

Name Of Prisoner Paul Howard Dorsey

Date Of Trial 12/13, 19 89 Judge Turnbull II

Charge _____ Guilty _____ NOT GUILTY _____

DISPOSITION:

A. Sentenced To Department Of Correction _____
Length Of Sentence

B. Sentenced To Baltimore County Detention Center _____
Length Of Sentence

C. Remanded To Baltimore County Detention Center _____
Probation ~~Report Of Psychiatric Evaluation~~

D. Placed On Probation _____
Length Of Probation

E. Sentenced To Baltimore County Detention Center Work Release Recommended _____

_____

F. Stet _____

G. Nol Pros _____

H. Arraignment _____

I. Trial Continued _____

J. Trial Postponed _____

K. Bail Hearing _____

L. Defendant Released From This Case Only.
Release In Transit.

SUZANNE MENSH, CLERK

Per _____
Deputy Clerk

WRIT OF HABEAS CORPUS

CIRCUIT COURT FOR BALTIMORE C TY #4

1 of 5

State of Maryland vs. Paul Howard Inskeep SR Case No. 89CR6997

I. D. NO.

State of Maryland, Baltimore County to wit: D.O.B. April 8, 1943

TO: Warden; Baltimore County Det. Center / Warden; DOC
Kenilworth + Bosley Ave.
Baltimore, MD 21204

You are hereby COMMANDED TO HAVE before the Judges of the Circuit Court for Baltimore County, County Courts Building, 401 Bosley Avenue, Towson, Maryland, on December 13, 1989 at 09:15 A.M. the body of Paul Howard Inskeep SR for ARRAIGNMENT, unless your counsel enters an appearance in writing on or before the time specified in this writ.

Witness the Honorable Chief Judge of the Third Judicial Circuit of Maryland.

Issued: December 8, 1989

Suzanne Mensh

SUZANNE MENSH
Clerk, Circuit Court for Baltimore County

Paul Howard Inskeep

Per _____ Deputy

RETURN OF SERVICE

DATE DEFENDANT SERVED WITH WRIT & CHARGING DOCUMENT: 12-11-89

DATE SERVICE NOT MADE: _____

REASON: _____

FILED DEC 14 '89

SIGNATURE J. Edward Malone

SHERIFF OF BALTO. CO., MD.

STAIE OF MARYLAND	*	IN THE CIRCUIT COURT
VS.	*	OF MARYLAND FOR
PAUL INSKEEP	*	BALTIMORE COUNTY
	*	89CR6997-7000

* * * * * * * * * * * * * * * *

NOTICE OF APPEARANCE

Please note the appearance of Nancy Cohen, Assistant Public Defender, as counsel in the above-captioned case.

Nancy Cohen

Nancy Cohen
Assistant Public Defender
500 Virginia Ave.
Towson, Maryland 21204
321-3727

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Notice and and the appended Motions Pursuant to Rule 4-252 and Request for Discovery was delivered to the Office of the States Attorney for Baltimore County, Courts Building, Towson, Maryland 21204 on December 13, 1989 .

Nancy Cohen

Nancy Cohen
Assistant Public Defender

FILED DEC 14 '89

STATE OF MARYLAND	*	IN THE CIRCUIT COURT
VS.	*	OF MARYLAND FOR
PAUL INSKEEP	*	BALTIMORE COUNTY
	*	89CR6997-70

* * * * * * * * * * * * * * * *

MOTIONS PURSUANT TO MARYLAND RULE 4-252

Defendant by his/her attorney pursuant to Maryland Rule 4-252, respectfully represents unto this Honorable Court:

1. That any identification of the defendant was or will be tainted as a result of impermissibly suggestive identification procedures by police authorities and/or was or will be the result of an illegal arrest or search.
2. That evidence was obtained as the result of an illegal search and seizure, arrest, and/or interception of communications.
3. That any statement/confessions taken from the defendant were involuntary and/or elicited during custodial interrogation without observance of procedural requirments of law.
4. That the defendant will be prejudiced by the joinder of his trial with that of any co-defendants and the joinder of charges arising from separate incidents.
5. That the indictment/information is defective.
6. That this prosecution is barred because of statute of limitations, immunity, and/or double jeopardy.

WHEREFORE, the defendant prays the following relief:
a) Dismissal of the indictment/information;
b) Suppression of any in-court identification and/or illegally seized evidence and/or any statements/confessions;
c) Severance of indictments/informations and/or severance of his/her trial from that of any codefendants;
d) And any further relief available by law.

Nancy Cohen

Nancy Cohen
Assistant Public Defender
500 Virginia Ave.
Towson, Maryland 21204
321-3727

Citation of authorities: Chapman v. California, 386 U.S. 18 (1967) Coleman v. State, 8 Md. App. 65 (1969), Mapp v. Ohio, 367 U.S. 18 (1961), Hillard v. State, 286 Md. 145 (1979), Erman v. State, 49 Md. App. 605 (1981), McKnight v. State, 280 Md. 604 (1977), Ayre v. State, 291 Md.155 (1981), Benton v. Maryland, 295 U.S. 784 (1979), McMorris v. State, 277 Md. 62 (1976).

STATE OF MARYLAND	*	IN THE CIRCUIT COURT
VS.	*	OF MARYLAND FOR
PAUL INSKEEP	*	BALTIMORE COUNTY
	*	89CR6997-70

* * * * * * * * * * * * * * * *

REQUEST BY DEFENDANT FOR DISCOVERY AND
MOTION TO PRODUCE DOCUMENTS

The following requests are made by the defendant in accordance with Maryland Rule 4-263 and the provisions of that rule governing disclosure without request, obligations of the States Attorney and continuing duty to disclose are incorporated by reference.

The States Attorney is requested to:

1. Disclose the name and address of each person known whom the State intends to call as a witness at the hearing or trial to prove its case in chief or to rebut alibi testimony.

2. Disclose all statements made by the defendant to a State agent that the State intends to use at a hearing or trial, and provide to counsel for the defendant a copy of any written or recorded statement, and the substance of any oral statement along with a copy of all reports of any oral statement.

3. Furnish to counsel for the defendant a copy of any written or recorded statement, and the substance of any oral statement along with a copy of all reports of any oral statement made by a codefendant to a State agent which the State intends to use at a joint hearing or trial.

4. Produce and permit counsel for the defendant to inspect and copy all written reports and statements (and the substance of any oral report and conclusion) made in connection with the action by each expert consulted by the State, including the results of any physical or mental examination, scientific test, experiment or comparison.

5. Produce and permit counsel for the defendant to inspect, copy and photograph any documents, recordings, photographs, or other tangible things the State intends to use at the hearing or trial.

6. Produce and permit counsel for the defendant to inspect, copy and photograph any item obtained from or belonging to the defendant, whether or not the State intends to use the item in court.

Nancy Cohen

Nancy Cohen
Assistant Public Defender
500 Virginia Ave.
Towson, Maryland 21204
321-3727

NOTICE OF HEARING

CUIT COURT FOR BALTIMORE COUN

State of Maryland vs. Paul Howard Inskeep SR Case No. 89CR6997-7000

State of Maryland, Baltimore County to wit:

TO: Nancy Cohen , Esquire
500 Virginia Avenue
Public Defender'S Office
Towson, MD 21204

You are hereby NOTIFIED TO APPEAR before the Judges of the Circuit Court for Baltimore County, County Courts Building, 401 Bosley Avenue, Towson, Maryland, on March 1, 1990 at 09:15 A.M. for the Trial of the above entitled case.

Any postponement of this date must be in accordance with MD. Rule 4-271.

Witness the Honorable Chief Judge of the Third Judicial Circuit of Maryland.

Issued: December 29, 1989

Suzanne Mensh

SUZANNE MENSH
Clerk, Circuit Court for Baltimore County

Per Joan Mather Deputy
Criminal Assignment Commissioner
887-2694

CC: Michael Pulver, Esquire

COURT CLERK'S WORK SHEET

TRIAL DATE 2/2/90 Judge E.A.D. Jr

M. Pulver — STATE'S ATTORNEY

B. N. Cohen — DEFENDANT'S ATTORNEY

N. Del Pizzo — COURT REPORTER

E.A.a. — CLERK

CASE # 89CR6997 NAME Paul Inskeep

CHARGE Rape

TRIAL _____ COURT JURY PLEA _____ GUILTY NOT GUILTY NOLO CONTENDERE

MOTIONS: 1. END of STATE'S CASE defs. Motion for Judgment of ACQUITTAL

GRANTED OVERRULED

2. END of ENTIRE CASE defs. Motion For Judgment of ACQUITTAL

GRANTED OVERRULED

VERDICT: GUILTY ON COUNTS NOT GUILTY ON COUNTS

SENTENCE	TERM OF	SUSPENDED	PROB.	FINE & COSTS
Department of Correction				
Balto. Co. Detention Center				

REMARKS Trial date 3/1/90 ppd. at the request of the Δ for good cause shown (Δ to ~~be~~ attend ~~E/E at Sexual~~ a Sexual Disorders Clinic on 3/6/90 + to be E/E at Clifton T. Perkins Hospital + an analysis to be done at Testing Lab - Cell Mark Diagnostics). Δ remanded BCDC per detainer. Δ waives Right to a speedy trial + to Md. Rule 4-271 in open court

NOTE: IF PRE-SENTENCE REPORT IS ORDERED OR DEFENDANT IS ON PROBATION — DEFENDANT MUST REPORT TO PROBATION DEPARTMENT FIFTH FLOOR, ROOM 508, COUNTY COURTS BUILDING IMMEDIATELY WITH COUNSEL.

L-101

CIRCUIT COURT FOR BALTIMORE COUNTY 89CR5882

Towson, Maryland 21204 89CR7000, 89CR3085-89CR2294-95+96

District Court Case No. 89CR6997, 98, 99

Case No. 89CR2569-2570

2/2, 19 90

REPORT OF PRISONER BROUGHT TO COURT FOR TRIAL

FROM: SUZANNE MENSH, Clerk

TO: THE SHERIFF OF BALTIMORE COUNTY, MARYLAND

Name Of Prisoner Paul Drabeep

Date Of Trial 2/2, 1990 Judge Edward A. DeWaters, Jr.

Charge Rape Guilty ____ NOT GUILTY ____

DISPOSITION:

A. Sentenced To Department Of Correction ____
Length Of Sentence

B. Sentenced To Baltimore County Detention Center ____
Length Of Sentence

(C.) Remanded To Baltimore County Detention Center ✓ per delaney
~~Probation Report Of Psychiatric Evaluation~~

D. Placed On Probation ____
Length Of Probation

E. Sentenced To Baltimore County Detention Center Work Release Recommended ____

F. Stet ____

G. Nol Pros ____

H. Arraignment ____

I. Trial Continued ____

(J.) Trial Postponed date 3/1/90 ✓

K. Bail Hearing ____

L. Defendant Released From This Case Only.
Release In Transit.

SUZANNE MENSH, CLERK

Per Elizabeth Adams
Deputy Clerk

NOTICE OF HEARING

CIRCUIT COURT FOR BALTIMORE COUNTY

State of Maryland vs. Paul Howard Inskeep SR Case No. 89CR6997 —
7000

State of Maryland, Baltimore County to wit:

TO: Nancy Cohen , Esquire
500 Virginia Avenue
Public Defender'S Office
Towson, MD 21204

You are hereby NOTIFIED TO APPEAR before the Judges of the Circuit Court for Baltimore County, County Courts Building, 401 Bosley Avenue, Towson, Maryland, on June 4, 1990 at 09:15 A.M. for the Trial of the above entitled case.

Any postponement of this date must be in accordance with MD. Rule 4-271.

Witness the Honorable Chief Judge of the Third Judicial Circuit of Maryland.

Issued: February 6, 1990

Suzanne Mensh

SUZANNE MENSH
Clerk, Circuit Court for Baltimore County

Per Joan Mather Deputy
Criminal Assignment Commissioner
887-2694

CC: Michael Pulver, Esquire

STATE OF MARYLAND * IN THE CIRCUIT COURT

VS. * FOR BALTIMORE COUNTY

Paul Howard Inskeep * 89 CR 6997

* * * * * * * * * * * * * * * *** * * * * * * * * * * * * * * *

STATE'S ANSWER TO DEFENDANT'S
MOTION FOR DISCOVERY AND INSPECTION

Now comes Sandra A. O'Connor, State's Attorney For Baltimore County, and Michael Pulver, Assistant State's Attorney for Baltimore County, and in Answer to Defendant's Motion for Discovery and Inspection, says the following:

1. Upon reasonable notice to this office, the Defendant or his Counsel may inspect and copy any books, papers, documents, recordings or photographs which the State intends to use at trial; inspect and photograph any tangible objects which the State intends to use at trial; and to inspect, copy and photograph any item obtained from or belonging to the Defendant.

2. Upon reasonable notice to this office, the Defendant or his Counsel may inspect and copy all written reports or statements made in connection with this case by each expert consulted by the State. If any oral report has been made by such an expert, a report will be attached hereto indicating the substance of the report and any conclusions reached. A copy of any written reports, if available, will be attached hereto.

3. ✓ The Defendant made no statements or confessions, oral or written, which are known to the State at the present time.

_____ The Defendant made a written statement or confession, the copy of which is attached hereto.

_____ The Defendant made an oral statement or confession, the substance of which is as follows:

4. _____ The Co-defendant(s) made no statements or confessions, oral or written, which are known to the State at the present time.

_____ The Co-defendant(s) made a written statement or confession, the copy of which is attached hereto.

_____ The Co-defendant(s) made an oral statement or confession, the substance of which is as follows:

5. At the present time, there is no information known to the State which is exculpatory, in any manner, to the Defendant.

6. The State reserves the right to amend and/or supplement this answer, upon reasonable notice to the Defendant or his Counsel before the trial, by supplying information not presently known to the State's Attorney's Office.

7. As to all other requests by the Defendant (except for the answer to 8 below), the State declines to answer because those requests do not come within the purview of Maryland Rule 4-263.

8. The names and addresses of the witnesses now known that the State intends to call to prove its case in chief or to rebut alibi testimony are as follows:

See Attached Witness List.

FILED MAR 21 1990

9. Upon notice to the State, the Defendant may inspect the contents of the State's file in this case, excluding those items otherwise privileged by law.

Sandra A. O'Connor

SANDRA A. O'CONNOR
STATE'S ATTORNEY FOR BALTIMORE COUNTY

ASSISTANT STATE'S ATTORNEY FOR BALTIMORE COUNTY

I HEREBY CERTIFY that a copy of the aforegoing State's Answer to Defendant's Motion For Discovery and Inspection was sent this 16th day of March, 1970, to Nancy Cohen 500 Virginia Ave Towson MD 21204

ASSISTANT STATE'S ATTORNEY FOR BALTIMORE COUNTY
COUNTY COURTS BUILDING
TOWSON, MARYLAND 21204

STATE OF MARYLAND	*	IN THE CIRCUIT COURT
VS	*	FOR BALTIMORE COUNTY
PAUL H. INSKEEP	*	CASE NO. 89 CR 5882, 89 CR 6997, 89 CR 6998

* * * * * * * * *

ANSWER TO STATE'S MOTION FOR APPROPRIATE RELIEF

Defendant, Paul H. Inskeep, by his attorney, Nancy M. Cohen, Assistant Public Defender answers the State's Motion for Appropriate Relief as follows:

1. Defendant is charged with Rape and related offenses in each of the above captioned cases as well as eight other cases awaiting trial in this Court.

2. Defendant was advised that DNA identification tests had been performed in case no. 89 CR 5882.

3. On September 25, 1989, Defendant, through counsel, retained Cellmark Diagnostics to retest the evidence in case no. 89 CR 5882.

4. Defense counsel advised the State that Cellmark had been hired and requested the release of any remaining evidence so that it could be delivered to Cellmark for testing. Assistant State's Attorney, Michael Pulver, informed counsel that the FBI lab would not accept the State's evidence in other cases involving Defendant and that the State was considering employing Cellmark for those cases. Counsel reiterated that Cellmark was a defense expert and that any testing performed for the State in a case involving the Defendant would present a conflict of interest.

5. Dr. Daniel Garner, a representative of Cellmark Diagnostics, assured counsel that once hired by the defense,

Cellmark would refrain from performing any tests on evidence from the State in cases involving Defendant. Cellmark further advised that their own procedures would alert them to the submission of such evidence so that it would be rejected prior to any testing.

6. After months of repeated requests for the evidence in case no. 89 CR 5882, and the filing of a Motion To Compel Discovery, defense counsel was informed that the evidence was stored at the Baltimore County Police Headquarters. While arranging for transportation of the evidence, it was revealed that Cellmark had inadvertently accepted evidence from the State in cases involving Defendant.

7. The State sent evidence to Cellmark knowing that it had already been retained by the defense. Thus, any resulting loss is due to the State's own conduct.

8. Having been retained by Defendant, Cellmark Diagnostics is an agent of the defense and as such, is bound by the attorney/client and work product privileges both of which would be violated if the Court granted the State's motion.

9. The State has advised Defendant that it will seek to try together all eleven rape cases now pending against him. Should the Court grant the State's motion, Cellmark would be in the position of State's expert and Defense expert in one trial. Such a situation would deny Defendant a fair opportunity to competently confront and cross examine the State's evidence and, ultimately, deny him a fair trial.

10. Should the Court grant the State's Motion, Defendant will be left without an expert to competently confront and cross

examine the State's evidence.

11. This Court lacks jurisdiction to enforce the State's contract for services with Cellmark Diagnostics. Cellmark clearly has its own procedures for dealing with conflict situations and has declined to deviate from their procedures in this case. The State is free to pursue civil action to enforce its contract with Cellmark, but cannot use a criminal court for that purpose.

12. This Court lacks authority to Order Cellmark to perform testing.

13. Such other reasons as shall be presented at the hearing on this Motion.

WHEREFORE, Defendant prays this Honorable Court:

A. Hold a hearing on this Motion;

B. Grant the State's request to the extent that Cellmark be prohibited from destroying or contaminating the evidence.

C. Deny the State's Motion for an Order directing Cellmark to test the evidence.

D. Deny the State's Motion for an Order directing Cellmark to disclose information regarding procedures and test results.

E. Such further relief as may be appropriate.

Respectfully submitted,

Nancy M. Cohen

Nancy M. Cohen
Assistant Public Defender
500 Virginia Avenue
Towson, Maryland 21204
321-3779

CERTIFICATE OF SERVICE

I HEREBY CERTIFY this 3rd day of April, 1990 that a copy of the foregoing Motion was delivered to Mickey Norman, Esq. and Robin Coffin, Esq., Assistant State's Attorneys for Baltimore County, County Courts Building, Towson, Maryland 21204.

Nancy M. Cohen

Nancy M. Cohen
Assistant Public Defender

STATE OF MARYLAND	*	IN THE
VS	*	CIRCUIT COURT
PAUL H. INSKEEP	*	FOR
CASE NO. 89 CR 2294-96, 89 CR 2569-70, [redacted], 89 CR 5882, 89 CR 7000, 89 CR 6997-99	*	BALTIMORE COUNTY

89CR6997

* * * * * * * * *

89CR3085

PLEAS

Now comes the Defendant, Paul H. Inskeep, by his attorney, Nancy M. Cohen, Assistant Public Defender, and as pleas to the within charges says:

1. Not guilty.

2. Not criminally responsible by reason that at the time of the commission of the offenses alleged, the Defendant suffered mental disorder and/or mental retardation and lacked substantial capacity to either appreciate the criminality of his conduct or to conform his conduct to the requirements of the law.

3. Not competent to stand trial in that the Defendant is unable to understand the nature of the proceedings against him or to assist in his defense.

4. The filing of the instant plea is vital to the proper representation of the Defendant.

Nancy M. Cohen

Nancy M. Cohen
Asst. Public Defender
500 Virginia Avenue
Towson, Maryland 21204
321-3779

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Plea has been delivered to the Office of the State's Attorney for Baltimore County, County Courts Building, Towson, Maryland 21204, this 5th day of April, 1990.

Nancy M. Cohen

Nancy M. Cohen
Asst. Public Defender
500 Virginia Avenue
Towson, Maryland 21204
321-3779

STATE OF MARYLAND	*	IN THE CIRCUIT COURT
VS.	*	FOR BALTIMORE COUNTY
PAUL H. INSKEEP	*	CASE NOS.: 89 CR 5882 89 CR 6997 89 CR 6998

* * * * *

STATE'S SUPPLEMENTAL ANSWER TO DEFENDANT'S MOTION FOR APPROPRIATE RELIEF

Now comes Sandra A. O'Connor, State's Attorney for Baltimore County, and Robin S. Coffin and Mickey J. Norman, Assistant State's Attorney for Baltimore County, and in Supplemental Answer to Defendant's Motion for Appropriate Relief, says:

1. On 3/19/90 Robin S. Coffin and Mickey J. Norman were assigned the prosecution of the cases against the Defendant.

2. Prior thereto, the cases against the Defendant were assigned to Michael Pulver and Glen Lazzaro, both of whom have since left the office of the State's Attorney for Baltimore County.

3. On 3/22/90, the undersigned met with Det. Karen Ford-Gentry regarding these cases. At that time, we were advised of Cellmark's conflict of interest and our inability to obtain any information from Cellmark regarding testing on the submitted evidence.

4. At the time of the undersigns meeting with Det. Gentry, it was the State's belief that when the evidence from the above-captioned cases was submitted to Cellmark, the State was unaware of Cellmark's contract with the Defendant.

5. Upon the filing of the Defendant's Answer to the Motion for Appropriate Relief, the undersigned contacted Michael Pulver, Esquire.

3

6. It has since been learned that while Michael Pulver was aware of the contract by the Defendant with Cellmark, he believed that the cases were seperate and thus not a conflict of interest.

7. The Defendant had contracted with Cellmark to re-test evidence in Case Number 89 CR 5882, the State contracted with Cellmark to perform DNA Testing on Case Numbers 89 CR 6998 and 89 CR 6997.

8. That until the State is aware of exactly what was done with the evidence, the State will be unable to make an informed decision as to whether or not the evidence should be submitted to another laboratory for testing.

9. That the evidence submitted to Cellmark, for testing, is very important and necessary to the State in the prosecution of the above-captioned Defendant.

WHEREFORE, the State respectfully requests that this Court:

A. Issue an Order to Cellmark Diagnostic directing them to maintain the evidence in such an enviornment that would prohibit the evidence from deteriorating or in any way become contaminated so that future testing on said evidence may be completed,

B. Pass an Order directing Cellmark Diagnostic to disclose to the State all procedures, and the results of any and all procedures of testing performed on said evidence, and

C. For such other and further relief as the nature of this cause requires.

Sandra A. O'Connor by RS

SANDRA A. O'CONNOR
State's Attorney for Baltimore County

Mickey J. Norman

MICKEY J. NORMAN
Assistant State's Attorney for
Baltimore County

ROBIN S. COFFIN
Assistant State's Attorney for
Baltimore County

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that a copy of the aforegoing Motion for Appropriate Relief was hand delivered on this 10th day of April, 1990, to: Nancy Cohen, 500 Virginia Avenue, Towson, Maryland 21204 and Russell White, Suite 1110, Hampton Plaza, 300 E. Joppa Road, Towson, Maryland 21204.

ROBIN S. COFFIN
Assistant State's Attorney for
Baltimore County

COURT CLERK'S WORK SHEET

TRIAL DATE 04/10/90 Judge Smith

R. Coffin / N. Cohen / R. White.

STATE'S ATTORNEY / DEFENDANT'S ATTORNEY

Tony Greived / Bruce Hall

COURT REPORTER / CLERK

CASE # 89CR6997 / 66569300 NAME Paul Inskeep

CHARGE Rape etc.

Motions hearing

TRIAL ____ PLEA ____

COURT JURY / GUILTY / NOT GUILTY / NOLO CONTENDERE

MOTIONS: 1. END of STATE'S CASE defs. Motion for Judgment of ACQUITTAL

GRANTED / OVERRULED

2. END of ENTIRE CASE defs. Motion For Judgment of ACQUITTAL

GRANTED / OVERRULED

VERDICT: GUILTY ON COUNTS NOT GUILTY ON COUNTS

SENTENCE	TERM OF	SUSPENDED	PROB.	FINE & COSTS
Department of Correction				
Balto. Co. Detention Center				

REMARKS Deft w/draws Motion to Compel dated 12/14/89 in Open Court. States Motion for Approp. Relief is Granted: Order to be filed

Deft remanded BCDC

NOTE: IF PRE-SENTENCE REPORT IS ORDERED OR DEFENDANT IS ON PROBATION — DEFENDANT MUST REPORT TO PROBATION DEPARTMENT FIFTH FLOOR, ROOM 508, COUNTY COURTS BUILDING **IMMEDIATELY WITH COUNSEL.**

STATE OF MARYLAND	*	IN THE CIRCUIT COURT
VS.	*	FOR BALTIMORE COUNTY
PAUL H. INSKEEP	*	CASE NOS. 89-CR-6997 89-CR-6998

* * * * *

ORDER OF COURT

A hearing concerning the above-captioned cases having been conducted on April 10, 1990 and this Court having heard arguments by both the State and Defendant:

It is this 12th day of April, 1990, ORDERED that Cellmark Diagnostics shall provide in writing to both the State, represented by Mickey J. Norman and Robin Coffin of the Baltimore County State's Attorney's Office and the Defendant, represented by Nancy Cohen of the Public Defender's Office, a detailed description of any and all procedures used, protocols employed or testing performed on evidence submitted by the Baltimore County Police Department under their Case Number E-237148 (Cellmark Case Number F891483) and E-561783 (Cellmark Case Number F891482).

It is further ORDERED that in providing the above-stated information, Cellmark Diagnostics SHALL NOT express an opinion, to either party, as to whether said evidence samples can be in any way identified as belonging to, coming from or consistent with the Defendant, Paul H. Inskeep.

JUDGE
CIRCUIT COURT FOR BALTIMORE COUNTY

Approved as to form and content.

ROBIN COFFIN
ASSISTANT STATE'S ATTORNEY

NANCY COHEN
ATTORNEY FOR DEFENDANT

MICKEY J. NORMAN
ASSISTANT STATE'S ATTORNEY

FILED APR 12 1990

Office of State's Attorney
Baltimore County
401 Bosley Avenue
Towson, Maryland 21204
(301) 887-6600

Sandra A. O'Connor
State's Attorney

April 12, 1990

Nancy Cohen
Assistant Public Defender
500 Virginia Avenue
Towson, Maryland 21204

Re: State of Maryland
vs.
Paul H. Inskeep
Case Nos. 89-CR-6997
89-CR-6998

Dear Ms. Cohen:

Enclosed please find a Court Order which was prepared, as a result of Judge Smith's ruling on April 10, 1990. I forwarded a copy to Judge Smith. If the Order meets your approval, as to form and content, please notify Judge Smith so that the Order may be signed and thereafter, forwarded to Cellmark, to avoid any more delays.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Mickey J. Norman
Assistant State's Attorney
for Baltimore County

MJN:dmf

Enclosure

cc: ✓Honorable James Smith

STATE OF MARYLAND	*	IN THE CIRCUIT COURT	
VS.	*	FOR BALTIMORE COUNTY	
		89CR2294	89CR6997
		89CR2295	89CR6998
PAUL INSKEEP	*	CASE NOS.: 89CR2570	89CR6999
		89CR3085	89CR2569
		89CR5882	89CR2296
		89CR7000	

* * * * *

STATE'S MOTION FOR JOINT TRIAL OF OFFENSES

Now comes Sandra A. O'Connor, State's Attorney for Baltimore County, and Mickey J. Norman and Robin S. Coffin, Assistant State's Attorneys for Baltimore County, and in Support of the State's Motion for Joint Trial of Offenses, says:

1. Md. Rule 4-253 provides for the joint trial of offenses, when a Defendant has been charged in two or more charging documents, upon the request of either party.

2. The Defendant, Paul Inskeep, Sr. has been indicted in eleven (11) cases, charging Rape, Burglary and related offenses.

3. The joinder of cases requires the balancing of potential prejudice to the Defendant against the savings of time and expense that separate trial would entail. Jennings v. State, 8 Md. App. 312, 259 A.2d 543 (1969), Peterson v. State, 15 Md. App. 478 (1972).

4. In determining joinder, the Court has recognized the so-called "signature" or "handwork" exception and deemed joinder appropriate, where the crimes are so unusual and distinctive as to be like a signature. Moore v. State, 73 Md. App. 36 (1987); Ellerba v. State, 41 Md. App. 712 (1979).

FILED APR 18 1990

5. As a general rule, a Defendant charged with similar but unrelated offenses is entitled to a severance where he establishes that the evidence as to each individual offense would not be mutually admissible at separate trials. Ellerba v. State, 41 Md. App. 712, 729; McKnight v. State, 280 Md. 604, 612 (1977).

6. In determining the admissibility of the evidence in each of these cases, the Court must look to the rules of evidence, as it relates to "other crimes evidence."

7. If the evidence of each of these offenses is admissible at each separate trial, as "other crimes evidence," it is proper that the cases be tried in one trial.

8. Evidence of other crimes may be admitted when it tends to establish. . . the identity of the person charged with the commission of a crime on trial. Ross v. State, 276 Md. 664, 669-70 (1976); State v. Jones, 395 A.2d 1182, 1186 (1979).

9. Evidence of other offenses may be received under the identity exception if it shows any of the following:

a) the Defendant's presence at the scene or in the locality of the crime on trial; ...

c) the Defendant's identity from a handwriting examplar, "mug shot", or fingerprint record from a prior arrest, or his identity through a ballistics test;

d) the Defendant's identity from a remark made by him, ...;

f) that the Defendant was found in possession of articles taken from the victim of the crime on trial; and

h) that a peculiar modus operandi used by the Defendant on another occasion was used by the perpetrator of the crime on trial. State v. Faulkner, 314 Md. 630, 552 A.2d 8961, 900 (1989).

10. In order to establish modus operandi, the other crimes must be "so nearly identical in method as to earmark them as the handwork of the accused. McKnight v. State, 280 Md. at 613.

11. However, earmarks that are not distinctive when considered separately, may yield a distinctive combination if considerated together and tend to suggest the perpetrator of the crimes is the same. Moore v. State, 73 Md. App. 36,41-42 (1987).

12. The earmarks of the Defendant in these offenses yields a distinctive combination, that when considerated together, suggest that the Defendant is the perpetrator of all of the offenses. (See attached 34 page synopsis of the offenses).

13. The evidence of the "other crimes" is independently and substantially relevant to the contested issue of identity. This evidence is reasonably necessary and serves an appropriate probative purpose. State v. Faulkner, 552 A.2d 896, 901.

14. The probative value of the "other crimes evidence" is not substantially outweighed by any unfair prejudice. Harris v. State, 567 A.2d 476, 501 Md. App. (1989).

WHEREFORE, the State prays that this Honorable Court:

a. hold a hearing on this motion; and

b. grant the State's Motion for the joinder of Case Numbers 89CR2294, 89CR2295, 89CR2570, 89CR5882, 89CR7000, 89CR6997, 89CR6999, 89CR2569, and 89CR2296, 89CR3085, and 89CR6998.

Sandra A. O'Connor n/za
SANDRA A. O'CONNOR
State's Attorney for Baltimore County

MICKEY J. NORMAN
Assistant State's Attorney for
Baltimore County

ROBIN S. COFFIN
Assistant State's Attorney for
Baltimore County

I HEREBY CERTIFY that a copy of the aforegoing State's Motion for Joint Trial of Offenses was mailed on this 16th day of April, 1990 to: Nancy Cohen, 500 Virginia Avenue, Towson, Maryland 21204 and Russell White, Suite 1110, Hampton Plaza, 300 E. Joppa Road, Towson, Maryland 21204.

ROBIN S. COFFIN
Assistant State's Attorney for
Baltimore County

MJN:RSC/mas

On Wednesday, January 18, 1989, between the hours of 0105 and 0120 hours, Ms. Sylvia Lynn Santana, DOB: 11/2/71, was asleep in her parent's bedroom, located in the rear portion, first floor, of her residence at 2418 Plainfield Road, 21222, Baltimore County. Ms. Santana's poodle began barking at the (interior) bedroom doors, which are hinged, louvered doors, and not solid wood. Ms. Santana awakened, peered through the slats in the door, asking "Who's there?" The doors were forced open, knocking Ms. Santana backward, by an unknown white male, wearing a dark ski mask covering his head and face, a navy colored bomber style, waist length winter jacket, navy colored slacks, and dark gloves. She described the man as being over six foot tall, appearing to have somewhat of a pot belly, at least 35 years old. She said the man walked slowly and his voice was medium toned, calm but hurried.

The man shoved Ms. Santana backward, causing her to fall on the bed, and he lied on top of her. She told him to take anything he wanted, but not to hurt her. The man calmly told her to do as he said and she wouldn't get hurt. She asked if he was going to hurt her and he responded, "no". The man raised her shirt, touched and kissed her breast, and removed her shorts and underpants. He held her down by laying one arm across her shoulders. The hand used to touch her breast was no longer gloved. As he kissed her breast, he raised his ski mask to the bridge of his nose, revealing a thick, dark mustache. He told her she had nice breasts.

The man unzipped his pants and removed his penis, telling her to touch his penis. He had great difficulty in obtaining and maintaining an erection and kept telling her to touch his penis, to "help" him and to "move" with him as he forced vaginal intercourse. The man asked her if she "did this", referring to sexual intercourse. Ms. Santana responded, "no", and the man said he had seen her and her boyfriend the Friday night before. Ms. Santana's boyfriend stayed at her residence on January 13th, the Friday night before, but they did not engage in sexual intercourse.

The intercourse was completed very briefly and the man stood up and zippered his pants. He asked her if she was going to tell

anybody, and she said she would not. He asked her if she could fix the bedroom door. She said yes, she could find someone to fix it. The man said, "Don't tell anybody and I won't have to tie you up. Just lay there." She assured him she would'nt tell anyone.

Ms. Santana observed the man walk in the direction of the kitchen, then heard an unusual sliding sound. She said he walked very slowly. After a few moments of silence, she got up and checked the doors of the residence to be sure they were locked, then telephoned 911.

Police examination of the residence revealed the rear sliding glass doors of the residence were secured with only a block of wood layed on the inside track. The wood was raised a few inches higher where the glass doors meet. The exterior aluminum door frame, at the point where the wood layed, has scratches on it, appearing to be fresh. Glove impressions were observed on the glass near the handle of the door.

Ms. Santana received a sexual assault examination from the resident gynecologist at Greater Baltimore Medical Center, shortly after the offense. The doctor retrieved hairs from inside of Ms. Santana's vagina, believed to be foreign.

Ms. Santanas parents left on 1/13/89 for a week long vacation in Florida. On 1/13, 1/14, and 1/15, Ms. Santana had friends spend the night with her. On 1/16 and 1/17, she was alone at the residence during the night. During the offense, nothing was disturbed nor taken from the residence. The phone in the residence is located in a very obscure section of the kitchen. Prior to the offense, Ms. Santana's telephone rang at approximately 2330 hours. She had been sleeping and did not answer the phone upon awakening. The phone stopped ringing and began ringing again, shortly thereafter. Ms. Santana answered and the caller was silent, then hung up.

On 1/18/89, Det. Ford spoke with Dr. Breitenecker, Forensic Pathologist at G.B.M.C. Dr. Breitenecker stated the laboratory analysis of the vaginal aspirate obtained from Ms. Santana showed markedly elevated acid phosphotase levels and quantities

of spermatazoa. Both results were indicative of very recent intercourse. Dr. Breitenecker stated the aspirate sample is being preserved for future laboratory analysis. Det. Ford took custody of the hair sample and submitted it as evidence. See related police report, H-015454, attachment A.

Prior to the above offense, several burglary/rapes, burglary/sex offenses, and burglaries, have occurred dating back to 1980. All offenses have had a similar modus operendi, similar suspect descriptions and similar locations. A suspect has been developed in these cases, namely Paul Howard Inskeep, Sr. A synopsis of these cases is as follows:

On Sunday, September 25, 1988 at approximately 0545 hours, Michelle Lynn Lay, DOB: 7/17/67, was asleep in her bedroom at her parents residence at 3813 Bayville Road, 21220, Baltimore County. Ms. Lay was awakened when she heard her bedroom door open. She was alone at the residence, and thinking her mother might have returned, she called, "mom". She heard a male voice say, "Don't worry, I won't hurt you. I'm a friend of the family", as he approached her.

She described him as an unknown white male, at least six foot tall, approximately 200 lbs., with a pot belly and a heavy, dumpy build. He wore a navy blue ski mask covering his head and face, a blue sweat shirt, faded blue jeans, rust colored suede work-type gloves. He had forward, rounded shoulders and she thought he was in his thirties.

Ms. Lay began yelling, "no", and moved to the far side of her bed. The man grabbed her, pulled her back to the other side of the bed, stating, "I won't hurt you. If you don't go along with me, I'll tie you up." He tore off her underpants and raised her nightgown above her breasts, then lied on top of her. He removed the glove from his right hand and fondled her right breast as he held her wrists down with his left hand. She said the hand was large and average textured. He attempted to kiss her and she noticed he was unshaven and had a full mustache. He kept telling her he won't hurt her and he would tie her up. He unfastened his brown leather belt, unzipped and lowered his pants. Then put his finger in her vagina. He penetrated her vagina with his penis, but had difficulty maintaining an erection. Ms. Lay told him she would rather die than cooperate, that she was only 21 (years old), and attends college.

The man got up and told her not to tell anyone. The man left toward the dining room, located in the rear of the house, and the sliding glass doors opened and closed. Ms. Lay's parents were away in West Virginia when the offense occurred.

While the man was in the residence, he removed the kitchen telephone from it's receiver, disabling the telephone in her bedroom. Ms. Lay believed a tube of Blistex lip balm was missing from her bedroom dresser. Nothing was missing nor disturbed in

the remainder of the house.

Ms. Lay received a sexual assault examination at Union Memorial Hospital. Det. Saunders took custody of the items collected during the exam. These items along with the victims clothing and bed clothes were submitted to the FBI Forensic Laboratory for the identification and analysis of foreign hairs, fibers, and body fluids suitable for comparative examination.

Police examination of the sliding glass doors revealed they are easily opened, even when locked, by lifting and pulling back on the door.

Ms. Lay's house is located within one half of a mile of Mary Jane Foard of 306 Lambson Court, 21220. Paul Howard Inskeep, Sr. lived with Ms. Foard until 1981, when he was criminally charged with sexually assaulting Ms. Foard's eldest daughter, Renee Hamil (details of this are included in the latter part of this application). Mr. Inskeep fathered Ms. Foard's youngest daughter, and visits her regularly. Ms. Foard has seen Mr. Inskeep driving through the neighborhood regularly, even on days he is not visiting his daughter.

See related police report G-272263, attachment B.

On Sunday, December 7, 1986 at approximately 0245 hours, Kathleen Hope Grannas, DOB: 6/21/53, was asleep in her ground floor bedroom at 3708 Holly Grove Road, 21220, Baltimore County. She heard a scratching sound at her bedroom door and alerted her boyfriend, Daniel Patton, who was sleeping beside her. The noise stopped and Mr. Patton got up to check if the noise had been made by his 9-year old son, in the next bedroom. Mr. Patton unlocked and opened the bedroom door and observed an unknown white male crouched beside the door knob. They described the man as being a white male, approximately 6 foot, 2 inches, 180 pounds with a stocky to heavy build, wearing a brown ski mask covering his head and face, brown gloves, a dark jacket and dark pants. They said the man spoke in a calm, normal tone, but felt he was attempting to disguise his voice.

The man stood up, holding an object in his left hand, and calmly told Mr. Patton to get back in bed. The man asked if there was any money in the house. Mr. Patton told him there was money in his pants pocket, but not much. The man asked, "Is that all?" and Mr. Patton said it was the only money. The man asked, "You swear?", Mr. Patton said he swears there is no other money in the house. At one point, Ms. Grannas told the man she had money in her purse on the dining room table.

The man said he had a gun and didn't want to hurt anybody. He then asked if anyone else was in the house. Mr. Patton told him his son was sleeping in the next room. The man stood silent, looking at Mr. Patton and Mrs. Grannas for a few seconds. He then stated, "I'm going to leave, give me a few minutes." Mr. Patton said, "Okay", and the man asked, "You swear?" Mr. Patton said "yes". The man closed the bedroom door. After a few moments, they heard a door open and close. After a few minutes of silence, Mr. Patton got up, checked his son, then checked the house. He discovered the kitchen door unlocked and the rear laundry room doors night latch was off. All door's were locked by Ms. Grannas prior to retiring.

Police examination of the house revealed the lock on the kitchen window was defective, allowing it to be opened from the

outside. A partial footprint appearing to be fresh was observed on the ground outside of the window. The exterior telephone lines had been severed.

The man stayed in the bedroom doorway as he spoke to Mr. Patton and Ms. Grannas. He did not attempt to retrieve the money from Mr. Patton's pants located inside the bedroom at any time. Ms. Grannas checked for the money in her purse and found the money untouched. Nothing else in the house appeared to be disturbed, nor taken.

Sometime later, Ms. Grannas discovered her driver's license missing from her purse. Sometime after the offense, Ms. Grannas had been contacted by a county roads employee who had recovered her license on Interstate 70, near the Catonsville area. By this time, she had obtained a new driver's license and told him to throw it away.

Prior to the offense, Mr. Grannas had been receiving phone calls that when she answered the phone, the caller remained silent. Her telephone number was unlisted and she knew of no one that would be making the calls.

On the night of the offense, Ms. Grannas' children, aged 11 and 5 years, were spending the night with their father. Mr. Patton usually works at night and drives his car to Ms. Granna's house. On this night Mr. Patton was off work. He and Ms. Grannas had gone out to dinner, picked up Mr. Patton's son, then rode in Ms. Grannas' car to her house. Ms. Grannas's house is located within one block of Mary Jane Foard's house.

See related police report, F-062221, attachment C.

On Wednesday, January 1, 1986 at approximately 0345 hours, Kimberly Jo Bryde, DOB: 1/14/70, was asleep on the living room sofa at 3925 Misty View Road, 21220, Baltimore County. Ms. Bryde was awakened by an unknown male sitting on the sofa with his arm around her waist. He told her, "Take your shirt off", then stated, "If you yell, I'll leave." Ms. Bryde said the man repeated his speech.

Ms. Bryde described the man as a white male, six foot tall, heavy build, wearing a brown ski mask over his head and face, a dark colored heavy winter coat, pee type or watchman type, baggy dark blue work type pants and brown gloves. He held in his hand a shiney object she believed to be a razor type knife.

Ms. Bryde screamed, "Butch", in an effort to summons Howard Vernon Vicars, who was sleeping in an upstairs bedroom. The man shoved his fingers in her mouth in an effort to muffle her scream. As Mr. Vicans awakened and began walking downstairs, the man fled from the residence exiting through the rear door. Mr. Vicars chased the man as he ran northbound between two houses, but lost sight of him after that. As Mr. Vicars was walking back to the residence, he observed a red four wheel drive vehicle driving on Bayville Road, toward Carroll Island Road. This was the only vehicle being driven in the area.

Police examination of the residence revealed the screen was removed from the dining room window. The glass was broken in the window and the window was raised approximately eight inches.

Familiar with Mr. Inskeep being a suspect, the police officers responded to the residence contacted Woodlawn Precinct requesting the officers check 1415 Langford Road, 21207. This residence is where Paul Howard Inskeep, Sr. was residing at the time, along with his parents. Off. Collins responded to the residence and found Mr. Inskeep's vehicle was not there, a 1983 Chevy Mini Blazer, red in color with black stripes, bearing Maryland registration Y03453. He broadcast this information over the police radio. At approximately 0605 hours, Off. Collins observed Mr. Inskeep driving the vehicle on Langford Road near Newfield Road. Off. Collins stopped the vehicle and approached the driver, Paul

Howard Inskeep Sr. Off Collins observed fresh mud on the floor mat of the vehicle, a pair of gloves on the console of the vehicle, and two blankets that appeared to be concealing items in the vehicle. Mr. Inskeep quickly exited the vehicle and locked the door behind him. He was wearing ill-fitting dark blue work pants, a dark blue sweat shirt, and brown work boots. He was not wearing a coat, although the weather was cold. Mr. Inskeep appeared to be very nervous and repeated his speech.

When he was asked to be taken to the victim for a one-on-one identification, Mr. Inskeep went to his vehicle and put on a brown jacket. He again locked his vehicle.

When Ms. Bryde observed Mr. Inskeep, she felt his pants, height and build were the same as the man who had broken in. Because of the ski mask having been worn, she could not make a positive identification of the man.

Ms. Brydes residence is located within ½ mile from Mary Jane Foard's house.

See related police report, E-683337, attachment D.

Tuesday, September 24, 1985, at approximately 0342 hours, Lynn Marie Sevil, DOB: 8/31/54, was asleep in her upstairs bedroom at her residence at 1144 Newfield Road. Ms. Sevil was awakened by an unknown white male approaching her bed. She described the man as being six foot, approximately 200 pounds, in his thirties, wearing a blue knit ski mask covering his head and face, a burgandy cotton baseball type jacket with gold colored stripes on the wrists and waistband, holding a pen light.

Ms. Sevil screamed and the man held an object to the left side of her face, telling her to shut up or he would cut her. He then told her to remove her clothing. She told him she was nude and he asked to see her. Ms. Sevil said, "no", then asked him not to do anything because she was having female trouble. She also stated if he would just leave, she wouldn't say anything. The man asked, "You won't say anything?" She stated, "Just leave now." The man left the room, pulling the door closed behind him until it was only slightly ajar.

Ms. Sevil's roommates, Kathleen McIntire and Stephen Keller, were asleep in another bedroom during the incident.

The Police were notified and the responding K-9 officer entered the residence through the undamaged, unlocked, rear door. Ms. McIntire was interviewed and related she had locked both doors, including the dead bolt locks, to the residence, prior to retiring for the night.

Subsequent interviews with Ms. McIntire revealed a "skeleton key" was missing from near the back door and her slip was missing from the den area of the residence. She described the slip as being a beige half slip with lace ruffles on the bottom, having a four inch tear on the side seam. Nothing else was disturbed, nor taken from the residence.

Det. Valentine, Baltimore County Police Sex Crimes Unit, conducted subsequent interviews with neighbors of Ms. Sevil.

Mary Johnson, residing at 1146 Newfield Road, related she had observed a red truck being driven by a white male with a mustache, glasses (sometimes), driving slowly along the alley at the rear of her residence. She observed the vehicle on four or

five occassions prior to the incident with Ms. Sevil. She believed the driver to be looking at her house as he drove by. The most recent time she had seen the vehicle was on 9/21/85, between the hours of 1900 to 1930.

Betty Smith, residing at 1156 Newfield Road, related she had observed a red truck, bearing Maryland registration Y03453, driving slowly in the rear alley of her house on 9/20/85. She first observed the vehicle at approximately 0630 hours, driving slowly. At approximately 0650 hours, she observed the vehicle parked in front of 1150 Newfield Road with the driver in the vehicle. At 0750 hours, she left for work and observed the vehicle still parked in front of 1150 Newfield Road. As she drove by the truck, the driver lowered his head. This prevented Mrs. Smith from seeing his face and only a green and white baseball cap he was wearing could be observed.

Mrs. Smith contacted the police. Off. Patton, Precinct 2, responded to the call and observed a 1983 red Chevy Blazer, bearing Maryland registration Y03453, parked in front of 1150 Newfield Road. He approached the vehicle and driver. The driver was Paul Howard Inskeep, Sr. At the time of the stop, Mr. Inskeep was wearing blue jeans, a light colored shirt and a reddish, baseball type jacket.

Mr. Inskeep appeared to be extremely nervous when questioned by Off. Patton. Mr. Inskeep stated he was waiting for his father to meet him at the location. Off. Patton asked him why he was to meet his father at this location since he and his father both resided less than ½ block away (1415 Langford Road). Mr. Inskeep could not provide an answer to the question.

Ms. McIntire was reinterviewed by Off. Fox, Precinct 2, on 10/22/85. She related approximately one week after the offense, she observed a white male with dark hair and a mustache, eye-glasses, approximately 35 years old, in a red Chevy Blazer, Maryland registration Y34535. The man and truck were stopped at the intersection of Kirkwood Road and Newfield Road, facing her residence. The man appeared to be looking at her residence. He then slowly drove away, watching Ms. McIntire as he passed.

See related police report, E-596593, attachment E.

On Friday, August 16, 1985 at approximately 0110 hours, Robin Denise Hovermale, DOB: 1/31/66, was asleep in her first floor bedroom at her residence of 425 Crisfield Road, 21220, Baltimore County. Ms. Hovermale was awakened by a loud bang. She closed her eyes again, then heard a second loud sound. Her bedroom door, which had been locked, flew open and an unknown white male was standing in the doorway. She described the man as being tall, having a heavy build, wearing a dark nylon jacket, wind breaker type, dark pants, a ski mask covering his head and face, dark with tan around the eyes and mouth, dark gloves and shining a pen light at her. She believed he had a mustache.

Ms. Hovermale screamed, "Tony", and nudged her boyfriend, Anthony Mouring, who was asleep beside her. The man told them, "Don't move, I have a gun." He hesitated, then asked Tony what his name was. Mr. Mourning responded, "Tony". The man told him to roll on his stomach, and when Mr. Mouring complied, the man tied Tony's hands behind his back with strips of terry cloth. The man put a hard object into Mr. Mourings' back and asked, "Do you know what this is?" Tony responded he did, believing the object to be a handgun.

The man then tore off Ms. Rovermale's terry cloth romper, and removed her underpants. She was crying loudly and he calmly told her to be quiet. She held her pillow against her face to muffle her cries. The man put his (ungloved) finger in her vagina then rubbed her body and breasts. He unzipped his pants and lied on top of her and attempted to have vaginal intercourse with her. His penis was not fully erect and he had difficulty penetrating her vagina. The man stood up, fumbled around her bureau, then applied hand lotion on her vulva and in her vagina. He then grabbed Ms. Hovermale around her waist and drug her onto the floor, then across the floor a few feet.

The man rubbed more hand lotion on the inside of her thighs. He repeatedly attempted to penetrate her vagina with his penis, however, he still was having difficulty maintaining an erection, he was not successful. He pushed her knees up, pushed away the pillow she was still clutching, and again attempted vaginal inter-

:ourse. The man was successful, and as he forced intercourse, :almly said, "Stop crying and I'll leave, stop crying and I'll .eave." He then said, "Move a little, move a little." She inderstood this to mean he wanted her to assist with the inter- :ourse. He again told her to stop crying. The man got up, tied ier feet, then her hands together with strips of terry cloth. The man touched something on Robins bureau and she observed him holding her mirror. She described the mirror as being hand sized, with a brown rectangular frame and the handle broken off. One side had a normal mirror, the other side had a magnifying mirror.

The man lifted the bedside telephone off its receiver, listened, then replaced it. He left the bedroom, returned and shone the pen light into Mr. Mouring's eyes. He left and returned to the doorway four of five additional times, then left the residence. After several moments, Robyn untied herself then untied Tony. They ran to her parents bedroom to call the police, however the phone line was dead. They then went to a neighbor's house and telephoned 911.

Police examination of the residence showed the molding had been pried off with an unknown tool, probably a screw driver, and one pane of glass had been removed from the rear kitchen window. The window was near the door, and he apparently reached in and unlocked the door. The exterior light bulb, near the door, had been unscrewed. The exterior telephone lines, also located at the rear of the house were severed. In the dining room, the phone had been removed from the jack and thrown into a nearby laundry basket.

Ms. Hovermale could not find her mirror and believed the man had kept it. Mr. Mouring believed he had fifteen dollars in various bills laying on the dining room table that was subsequently missing. Nothing else appeared to be disturbed nor taken from the residence. Both Ms. Hovermale and Mr. Mouring believed the man was surprized when he observed Mr. Mouring in the bedroom. Both Ms. Hovermale and Mr. Mouring stated the man spoke in a calm but hurried tone.

On 8/18/85, Ms. Hovermale went to Pc. 11 and spoke with Off.

On Saturday, March 30, 1985 at approximately 0500 hours, Monica Marie Trimp, DOB: 4/5/66, was asleep in her basement level bedroom at her residence at 432 Water Watch Court, 21220, Baltimore County. Ms. Trimp had just fallen asleep when she was awakened by a noise in her room. She observed an unknown white male standing in the doorway of her bedroom, holding a flashlight. She described the man as being approximately 6 foot, 1 inch tall, heavy set, but neither muscular nor obese, round or sloped shouldered, leaning his head forward as he talked, wearing a dark blue or green windbreaker jacket with a light colored or white pocket lining, dark denim or cottom work type pants, dark hard type shoes, a dark colored ski mask covering his head and face, leather winter work type gloves.

The man unfastened his coat, sat on the bed, and pulled her bed covers slightly down. Ms. Trimp said, "Please don't hurt me.", and he responded, "I have a knife, don't make me use it." The man raised her sweater, then directed her to remove her sweater. She complied and he removed his glove and touched her breasts. He told her to remove her pants and she complied. He then had vaginal intercourse with her. Ms. Trimp engaged the man in conversation during this time. He told her he had seen her before, but was afraid to approach her on the street. He also said he had been previously married and was 28 years old. He also asked her if she was a virgin.

At one point, the man raised the ski mask to his nose. Ms. Trimp observed his lips were not full and he had a mustache, light in color. Through the eye holes, she observed he had a somewhat lazy right eye.

After the intercourse, the man got up. He leaned over and kissed her on her cheek, stated he'd like to see her again. He walked to her doorway, hesitated a moment, then left through the rear sliding glass doors by opening then closing the door behind him. After a few minutes, Ms. Trimp ran to the doors and secured the doors by lowering the charlie bar. She then telephoned the police.

The man had apparently gained entry to the house through the

sliding glass doors that had not been locked.

Familiar with Paul Howard Inskeep, Sr., the responding officers requested officers from Woodlawn Precinct check 1415 Langford Road for Mr. Inskeep's Chevy Blazer truck. At approximately 0659 hours, Off. Shaffer responded and observed the truck, bearing Maryland registration Y03453, parked in front of the residence. The truck had rain drops on the hood and roof, but the sides of the truck were dry. The windshield had rain drops on it, but the area cleared by the windshield wipers was somewhat dry. All other parked vehicles in the area had rain drops on them, including the sides and windshield.

Paul Meredith Inskeep came out of the residence and approached Off. Shaffer, asking, "I saw you check my vehicle that my son drives. Is something wrong." When Off. Shaffer explained his presence, Mr. Inskeep said, Paul Howard Inskeep, Sr. had only driven the truck from the rear alley to the front of the residence at 0600 hours, because it was trash collection day.

Off. Shaffer noted the distance from the alley to the front of the house was insufficient to cause the wind to dry the sides of the truck while it was still raining.

On 1/15/86 at approximately 1455 hours, Ms. Trimp contacted Off. Heavner, Precinct 2. She stated she had been in front of Cockeysville Elementary School, 10535 York Road, when she observed a white male operating a red four wheel drive truck driving by her. The man honked the horn and waived at her. She believed the man was the same man that had raped her.

On 1/16/86 at approximately 1415 hours, Off. Holthaus conducted a follow up interview with Ms. Trimp. During this time, Off. Holthaus showed her a photograph of Paul Howard Inskeep, Sr. in an effort to determine if he was the man in the red truck. Ms. Trimp said, "That's him, that's the man who raped me." She also said the photo was very similar to the man in the truck.

Ms. Trimp stated she is absolutely positive that photograph is of the same man that raped her. She said through the eye holes she saw his eyes and when he raised the ski mask, she saw the shape of his cheeks and jaws, his mouth and mustache. She also said she got a good view of the man's front and back, as well as

his profile during the offense. She said the slouched stance depicted in the photo is also the same as the man that raped her.

Ms. Trimp's residence is located two blocks from the residence of Paul Howard Inskeep, Sr's. ex-wife and two children (a son and daughter), at 2133 Graythrone Road, 21220.

Det. Price interviewed Mrs. Inskeep who advised Mr. Inskeep had visited her and their children during the weekend of the offense, as well as the previous weekend. The reason for the frequency of his visits to her residence was due to her having her arm and leg in a cast.

See related police report, E-437901, attachment G.

On Friday, August 24, 1984 between 0100 and 0355 hours, Jeanette Adele Stanko, DOB: 8/29/62, was asleep in her basement level bedroom at her residence of 1461 Clairidge Road, 21207, Baltimore County. She was awakened by a hand on her shoulder. Ms. Stanko started to scream and her mouth was covered with a gloved hand. An unknown white male calmly stated, "Please don't scream. I've got a knife. Please don't make me use it."

She described the man as a white male, approximately 6 foot, 3 inches, heavy build, wearing a dark ski mask covering his head and face, a black pullover shirt, black pants, wearing dark wool gloves with vinyl palms. The man's stature had a hunched over appearance, and he walked slowly.

The man unhooked her bra, removed the glove from his right hand and fondled and kissed her breasts. He repeated, "Don't make me hurt you." He removed her underpants and pulled her to the edge of the bed. He took her hand and told her to lay on the floor. The man lowered his pants, lied on top of her and attempted to have vaginal intercourse with her. The man had difficulty in obtaining and maintaing an erection and told Ms. Stanko to "help" him. After a few seconds, the man got up, fastened his pants, and left through the rear basement door, which had been previously dead bolt locked.

Police examination of the residence revealed entry was gained by climbing up an 8-foot rear deck, cutting a piece of screen from the kitchen door and unlocking the screen door. The interior door had been left open for ventilation. It was apparent the man unlocked the deadbolt lock of the basement door and opened the door prior to waking Ms. Stanko. She stated the door is tight fitting and squeaks loudly. In addition, the dead bolt makes a loud click when unlocked. She heard neither before the man exited through the door. Nothing else was disturbed, nor taken from the residence.

Ms. Stanko's residence is located approximately 2 blocks from Paul Howard Inskeep, Sr's. residence at 1415 Langford Road.

Prior to the offense, Ms. Stanko had been out of town for two weeks, only returning home the night before. See related police

report, E-257370, attachment H.

On 9/4/84, Wilkens precinct officers conducted a community meeting regarding the two burglary/rapes (this offense and the offense included on the following pages), that had occurred in the Edmondson Heights area (around Langford Road area). The community was provided with a full description of the suspect in these offenses.

On 9/5/84, Elizabeth Jedlicka, residing at 1414 Kirkwood Road, stated she felt her neighbor, residing at 1415 Langford Road, matched the suspect description, exactly. In addition, she stated on 9/3/84 her and her daughter were getting out of their vehicle in the common alley behind Langford and Kirkwood Roads. They observed Mr. Inskeep walk by them. Mr. Inskeep stopped, turned around, and stared at them as they walked to the door of their residence. Once they reached the door, he commenced walking again.

On 9/6/84, a police surveillance was conducted in Langford Road area. From that night and several following nights, Off. Coburn noted that beginning at approximately 0300 hours, activities could be observed in the Inskeep residence. The lights and television being turned on and off, and Mr. Inskeep and his parents moving throughout the house.

A 1984 red S-10 Chevy Mini Blazer, bearing Maryland registration Y03453 was observed parked in front of the residence, and many times in the rear alley. The vehicle was registered to Paul Meredith Inskeep, but operated by Paul Howard Inskeep, Sr.

On 9/11/84, an anonymous caller contacted Woodlawn Precinct, stating they observed a red Chevy Blazer with a partial tag number ---453, was being slowly driven in the alley behind the 1400 block of Clairidge Road. The operator matched the description of the suspect given during the community meeting. The truck rode through the alley several times.

Off. Coburn noted that there are ample parking spaces on Langford Road, and the surrounding streets. Parking in the alley and driving through surrounding alleys would not be necessitated for finding a parking place.

On 9/12/84 at approximately 0015 hours, Det. Weiber was parked in the alley behind the 1100 block of Harwall Road, as part of the surveillance. Det. Weiber observed Paul Howard Inskeep, Sr. walking east bound in the alley, crossing Kirkwood Road. Det. Weiber was in an unmarked AMC police vehicle. Mr. Inskeep walked approximately ten yards past the vehicle, turned around and walked to the rear of the vehicle. He stooped down, read the tag number, then walked to the driver side window and looked at Det. Weiber, then walked west bound toward Kirkwood Road.

Det. Weiber stopped Mr. Inskeep and identified himself. Mr. Inskeep asked if he was doing something wrong, then said he couldn't sleep and was going for a walk. He was asked for identification and he produced a hankercheif, stating that was all he had with him. He provided his correct information and stated twice more that he was just going for a walk.

Det. Weiber requested through the radio, for Cpl. Smith to respond to his location. Mr. Inskeep became very nervous and said he was jogging, not walking. He added he occassionally walks or jogs through neighborhood alleys when he couldn't sleep.

Mr. Inskeep was wearing a black pull over type shirt, black slacks, black leather tie-type shoes. He was asked why he wasn't wearing jogging type clothes, and Mr. Inskeep said he was just walking, taking a short cut through the alley back to his house. Det. Weiber noted that Mr. Inskeep had been heading in the opposite direction of his house, and a shorter route would have been on Kirkwood Road, not the rear alley.

Mr. Inskeep was asked why he had looked at the tag number of the vehicle and he said, "Because I thought it was a police car."

After he was stopped, Mr. Inskeep walked out of the alley, then south bound on Kirkwood Road toward Newfield Road, away from his residence.

On Wednesday, August 1, 1984, Sally Maria Monteferrante, DOB: 6/24/50, had been reading in an upstairs den of her residence at 1413 Kirkwood Road, 21207, Baltimore County. At approximately 0400 hours, she went into her bedroom, shut off the lights and went to sleep. Shortly thereafter, Ms. Monteferrante was awakened by someone shining a flashlight in the hallway outside of her room.

She described the man as being a white male, approximately 6 foot, 2 inches, 200 pounds, large build, fair complexion, with a mustache, wearing a black bandana covering the lower half of his face, a black baggy, full length rain coat, and dark shoes.

Ms. Monteferrante asked, "Who's there?" The man walked into the bedroom and told her he had a knife. He said he wasn't going to hurt her, but would use the knife if he had to.

The man lied in the bed and directed her to remove her terry cloth romper. She complied, and the man lied on top of her and attempted to have vaginal intercourse with her. He had a good deal of difficulty obtaining and maintaining an erection. He told her to "help" him penetrate her vagina with his penis, and she complied. He repeatedly asked her if she was a virgin. He had vaginal intercourse with her for a few moments and afterwards told her she was "good". He asked her if she was going to call the police, then left through the rear kitchen door.

While the man was in her bed, Ms. Monteferrante felt the knife he was holding in his hand. She believed it to be a hunting type knife.

Police examination of the residence showed the man gained entry by putting a small bench taken from a neighbor's trash area, under the rear kitchen window. The window was unlocked and while standing on the bench, the man opened the window and took the door keys hanging under the window sill. The kitchen door was unlocked with the keys and entry was gained. Ms. Monteferrante felt the man was somehow previously aware that keys hung under the window. The keys were left at the residence.

The man removed her kitchen telephone from it's receiver. Nothing else in the residence was disturbed, nor taken.

Ms. Monteferrante's residence is located within two blocks of Mr. Inskeep's residence of 1415 Langford Road.

When Mr. Inskeep was stopped by Det. Weiber, he was less than ½ of a block from Ms. Monteferrante's house.

See related police report, E-237148, attachment I.

On Monday, November 16, 1981 at approximately 2400 hours, Renee Hammel, DOB: 8/11/68, was asleep in her bedroom at 306 Lambson Court, 21220, Baltimore County. She was awakened by her mother's boyfriend, Paul Howard Inskeep, Sr. He told her his back was sore and he wanted her to "crack" it. He then demonstrated how he wanted her to do it. He strattled her, then sat on her lower back and rubbed her back with his hands. He then sat on her buttocks and continued rubbing her back. He lied on the bed and told her to sit on his buttocks and rub his back. He then told her she was doing it wrong, and rolled on his back. He told her his ribs hurt and asked her to rub them. She complied, sitting next to him. Twice he told her to sit on top of him, strattled, but she instead, asked him how this would help his back. He lifted her by her waist and sat her on his penis. Ms. Hammel said he "began grunting", as he held her on top of him. She asked him to leave her bedroom. He told her "don't tell" and left her room.

At approximately 0200 hours, Ms. Hammel was awakened by Mr. Inskeep sitting on her bed. He told her his back still hurt and she again asked him to leave her room. He again told her not to tell anyone.

Ms. Hammel told her mother, Mary Jane Foard, about the incident. Ms. Foard subsequently proceeded with criminal charges, and severed her relationship with Mr. Inskeep.

See related police report, D-414440, attachment J.

On Tuesday, March 2, 1982 at approximately 0520 hours, Mary Jane Foard was asleep in her daughter's bedroom when she was awakened by loud noises. She walked to the top of the stairs, heard noises at her front door and observed the door knob moving back and forth. She ran to her bedroom to telephone police, but the line was dead. Ms. Foard then opened a window and began screaming for help. At this point, she heard the door being "smashed in", forced open, and heard footsteps coming up the stairs. She hid behind the bedroom door, holding a can of mace. Paul Howard Inskeep, Sr., entered the room and she sprayed him with mace. He overpowered her and drug her down the stair case and into the living room. Renee Hammel was awakened by the noises and ran to her mother's aid. Mr. Inskeep grabbed Ms. Hammel by her hair, but she broke free and ran into her grandmother's bedroom. Mr. Inskeep told her to go into her bedroom and Ms. Foard told her to comply with the request. As she neared him, he grabbed her by her hair and forced both her and Ms. Foard into Ms. Hammel's bedroom and closed the door behind them. He shoved Ms. Foard to the floor on the other side of the bed, then attempted to lift Ms. Hammel's shirt over her head, ripping the shirt during the struggle and causing her to fall to the ground.

Ms. Hammel, still cluthing her blouse, got free from Mr. Inskeep and attempted to flee. He grabbed her vulva and arm and threw her back to the floor. Still holding her arm, he began rubbing her vulva with his hand. He again attempted to lift her shirt over her head. Mr. Inskeep tore off her underpants. Ms. Hammel was still struggling to get away and he punched her on her back, twice. He then grabbed her by her waist, pulled her to him and rubbed her vulva against the area of his penis. He grabbed her breast and attempted to lift her blouse over her head. Ms. Hammel struggled free from him at this time, as he attempted to maintain hold of her and punched her. During this incident, he kept telling Ms. Hammel he wasn't going to hurt her. She told him he was hurting her, but he continued.

During this time, Ms. Foard could not see what Mr. Inskeep was doing because the room was dark. She heard her daughter

yelling and crying for Mr. Inskeep to stop, asking him what he was doing, and saying he was hurting her. She also heard their struggling. Ms. Foard felt a handgun in his coat pocket and removed the handgun. She attempted to fire the gun at him, but didn't know how to operate the weapon (a .45 caliber automatic). She twice struck Mr. Inskeep in the head with the gun and forced herself between him and her daughter. He struggled with Ms. Foard and attempted to get the weapon from her. He then put her in a head lock and applied pressure until she was nearly unconscious. She screamed, she would do anything he wanted, if he would let her daughter go. He released his hold, told her he loved her and wanted to be a family. He said he hadn't done what she had said he'd done to Renee (he was referring to the pending charges related to the preceeding offense). He kept hugging her and saying he loved her. He was calm at this point.

A neighbor, Ronald Cloud, entered the residence at this point, as he was summonsed by Ms. Foard's grandmother, Lillian Albrecht. Moments later, police arrived and arrested Mr. Inskeep.

Police examination of the residence showed the front door had been forced in, broken completely off it's hinges.

The automatic handgun with a loaded clip was recovered from under Ms. Hammel's bed. Mr. Inskeep's down filled vest was recovered with another loaded clip, a box of rounds, and a screwdriver in its pockets. Ms. Hammel's torn sweatshirt and underpants were also recovered. A flashlight was recovered in the living room, and clothesline was found in Ms. Hammel's bedroom.

In the remainder of his clothing, Mr. Inskeep had a knife. The knife was recovered from another coat pocket.

A crude telephone was found attached to Ms. Foard's exterior receiver box. Fingerprint comparisons showed Mr. Inskeep's fingerprints were recovered from the telephone.

See related police report, D-490619, attachment K.

Mr. Inskeep pled guilty to these preceeding two offenses, and was found guilty. He was placed on probation as a result.

On September 19, 1980 at approximately 0300 hours. JoAnn Asbury, DOB: 4/22/57, was asleep in her bedroom at her residence of 3808 Chestnut Road, 21220, Baltimore County. She was awakened by an unknown white male, holding his hand over her mouth and a steak knife to her throat.

She described him as being 6 foot, 1-2 inches tall, 200 to 210 pounds, a wrinkled face, with greenish/brown eyes, dirty blonde hair, a mustache, wearing a blue, hooded sweat suit with the draw string pulled tightly around his face and white tennis shoes. She added he walked like a duck and had rounded shoulders.

The man said he was going to have sex with her. Ms. Asbury said, "Okay, just don't hurt me." The man layed the knife on the night stand, disrobed and got in bed with her. He kissed her breasts and fondled her vulva and vagina.

Ms. Asbury engaged the man in conversation. During this time, he told her his name was "Paul", he found her name on insurance papers in her vehicle, knew her phone number and knew her Doberman Pincher had died the week before. He also related he had been watching her for about a month and had seen her in her yard, but didn't know how to approach her.

Ms. Asbury convinced him not to have intercourse with her. She told him she wouldn't call the police if he left. He stated he would leave and, "wouldn't do this again", if she didn't call the police. She walked him to the door and asked if he would mind taking out her trash. He complied with this request. As they walked, Ms. Asbury noted that her kitchen door and the attached storm door were held open with their latches. The doors had previously been locked.

Also, while they walked, the man admitted to her he had gotten the knife from her kitchen and had cut her kitchen telephone cord with the knife. He handed the knife to her and offered to pay to have the phone line fixed.

Police examination of the residence revealed entry had been gained by removing the screen from a rear kitchen window and opening the unlocked window. The cord on the kitchen telephone was severed, and her telephone answering machine was turned off.

While Off. Ash was at the residence investigating the offense, Ms. Asbury received a call from the man at approximately 0455 hours. He told her the time the police arrived at her house, and asked her why she had contacted the police. She engaged him in conversation until 0520 hours. During this time, he told her he worked at Sparrows Point.

Off. Ash attempted to have the call traced by the phone company. The only information obtained was that the call was from the Towson area of Baltimore County. Ms. Asbury had a non-published number and felt he obtained the number from her telephone while in her residence. Ms. Asbury had only been living at this residence for one month.

An ident-Kit composite drawing was compiled by Det. Biltz, Crime Lab, of the suspect in this offense. Ms. Asbury obtained a copy of the composite and showed it to her landlord and a neighbor. These people told her the composite looked like Norman Pfeltz, her next door neighbor at 3810 Chestnut Road.

She provided Det. Price with this information, who in turn obtained a photograph of Mr. Pfeltz. The photograph was placed fourth in a photo array of six photographs. Ms. Asbury observed the photographs and said, "I can't be sure. Number 3 or 4."

A more recent photograph of Mr. Pfeltz was placed in a photo array of six photographs and she subsequently identified Mr. Pfeltz.

Det. Price obtained an arrest warrant for Mr. Pfeltz which was subsequently served. Upon seeing Mr. Pfeltz in person, Det. Price observed Mr. Pfeltz did not closely match the description of the suspect given by Ms. Asbury. Det. Price extensively interviewed Mr. Pfeltz regarding the offense. Det. Price interviewed Mr. Pfeltz's wife, Lisa, who told her her husband had been home with her the entire morning of September 19th and the night of September 18th.

As a result of these interviews, as well as Mr. Pfeltz's hair color, height and weight being different, Det. Price was convinced Mr. Pfeltz was not the person responsible for this offense.

Det. Price conducted interviews with neighbors of Ms. Asbury and learned a man named "Paul" closely matched the description given and often spent the night with his girlfriend, Mary Jane Foard, at 3812 Chestnut Road.

On 9/25/85, Det. Price went to the residence and interviewed Ms. Foard. She told him her boyfriend, Paul Howard Inskeep, Sr. does stay at her house several times a week, but resides with his parents at 1415 Langford Road. She related he was 37 years old, 6 foot, 2 inches, 210 pounds, with light brown wavy hair, brown eyes, and a mustache. She related his build (rounded shoulders), and walk (duck footed) were the same, and he was employed at Bethlehem Steel, Sparrows Point. In addition, she said Mr. Inskeep had not been at her residence on 9/19.

Det. Price subsequently went to 1415 Langford Road and interviewed Mr. Inskeep. Det. Price observed Mr. Inskeep did closely match the description. Mr. Inskeep was shown the composite and given the description. He admitted to Det. Price that all information did in fact, match himself. He was asked to stand in a line-up, to stand among four others and be viewed by Ms. Asbury, at Baltimore County Police Headquarters on 9/26/80, and he agreed.

On 9/26/80, Mr. Inskeep called and said he had contacted his lawyer and that under no circumstances would he appear in a line-up.

After conferring with Baltimore County State's Attorney's office, Det. Price obtained an arrest warrant for Mr. Inskeep, charging him with this offense. The warrant was served, and Mr. Inskeep was placed in a line-up with four other men. Without hesitation, Ms. Asbury identified Mr. Inskeep as the man responsible for this offense.

See related police report, D-069560, attachment L.

Regarding the most recent offense on January 18, 1989 with Sylvia Santana, Ms. Santana's residence is approximately one mile from 1911 Robinwood Road, believed to be the current residence of Paul Howard Inskeep, Sr.

Baltimore Gas and Electric records were checked and revealed Virginia JoAnn Boyd, Paul Howard Inskeep, Sr's. wife, requested service to be connected at 1911 Robinwood Road and disconnected at 8217 Dundalk Road in June, 1988.

Records were checked by Security Officers at Bethlehem Steel, Sparrows Point, revealing Mr. Inskeep's work schedule is from Tuesday through Saturday, 3:00 p.m. to 11:00 p.m. shift. Mr. Inskeep did, in fact, work on 1/17/89, at these hours.

On 1/18/89, Det. Ford observed the three described vehicles parked in the driveway of 1911 Robinwood Road.

On 1/18/89 at 1448 hours, Paul Howard Inskeep, Sr. was observed driving on Robinwood Road in the Audi, Maryland registration VGT-343 by Off's. Hart and Widenhouse, Essex Precinct. He was followed and was observed driving to Bethlehem Steel. He parked his vehicle, got out and walked into the building. Mr. Inskeep had a full mustache and was wearing a black bomber style, waist length jacket.

All victims are single white females. All victim's live alone, were alone at the time, or believed to be alone at the time, or slept on a different level in the homes than other occupants. All victims are similar in appearance, attractive with shoulder length hair, slender to medium build, average heights.

All residents were entered from the rear, usually kitchen area, with little or no force. If force was required, the impressions were of a screwdriver type pry tool. Once inside, the perpetrator would open or unlock an alternate rear door prior to confronting the victims.

All victims described the perpetrators voice tone as being calm, but somewhathurried at times. At no time did the perpetrator raise his voice, have an angry tone, or use profanity. Many felt the perpetrator was somewhat gentle during the rape. The victims were asked to assist in the rape, and were sometimes complimented

by the perpetrator. At no time did the perpetrator attempt or request other sex acts. Many victims noted difficulty in the perpetrator obtaining and maintaining an erection.

All victims described the perpetrator as the same height, build, and general age. Most noted a full mustache. Many noted "slouched" or "rounded" shoulders, not an erect stance. Many noted a distinctive walk, namely "slow" or "Labored", and that he "walked like a duck". A ski mask, gloves and dark clothing were described, as often was a flashlight. A knife was threatened or displayed, as was a gun when confronting more than one person. Telephones were usually incapacitated in one way or another. Most received hang up calls prior to the offense, and on occasion, after the offense.

None of the residences were ransacked and the only items noted taken were small, personal items of the victim, with little value.

All offenses have occurred within a close proximity of Mr. Inskeep's residences, or previous residences. When Ms. Santana's case occurred, Mr. Inskeep was (and still is) living with his wife, approximately one mile away.

During Ms. Lay's case, Mr. Inskeep was also living at Robinwood Road, however, Ms. Lay's house is within ½ a mile from Mary Jane Foard's house at 306 Lambson Court. Ms. Foard is a former girlfriend of Mr. Inskeep, and the mother of his youngest daughter. Mr. Inskeep has visitation rights with this daughter.

Ms. Granna's house is located within 1 block of Ms. Foard's house. Ms. Bryde's case is located within ¼ mile of Ms. Foard's house.

Ms. Sevil's case occurred while Mr. Inskeep was living with his parents at 1415 Langford Road, ½ block away.

Ms. Hovermale's house is 3 blocks from Ms. Foard's house.

Ms. Trimp's case occurred two blocks from Mr. Inskeep's ex-wife's house at 2133 Graythorn Road, during a time Mr. Inskeep frequented the residence due to his ex-wife's broken leg and arm. At no other time have similar offenses occurred in this area.

Ms. Stanko's case occurred while Mr. Inskeep lived with his parents, 2 blocks away, as did Ms.Monteferrante's case.

Ms. Asbury's case occurred while Mr. Inskeep frequently stayed with Ms. Foard at 3812 Chestnut Road. It should be noted that no other offenses have occurred in the Chestnut Road area since Ms. Foard moved to Lambson Court.

It should also be noted that other offenses have not occurred in the Edmondson Heights area since Mr. Inskeep moved out of his parent's house.

No other similar offenses have occurred anywhere else in Baltimore County.

Based on these facts, it is apparent the perpetrator in these offenses are one and the same. Paul Howard Inskeep, Sr. was identified as the perpetrator by JoAnn Asbury, Renee Hammel and Monica Trimp in their respective cases. Mr. Inskeep and/or his vehicle was identified in the immediate area just before and/or after the offenses against Robin Hovermale and Lynn Sevil. After the offense with Kimberly Bryde, a red truck was observed in the area. When Mr. Inskeep was observed by Ms. Bryde, she felt his height, build, and clothing were the same as the perpetrator, and he had been stopped by the police while driving his red truck.

In conversations your affiant has had with Ms. Foard, she related the following regarding Mr. Inskeep while he lived with her:

Mr. Inskeep is an avid hunter and has a trunk in which he keeps his hunting supplies. One time after a hunting trip, Ms. Foard looked in his trunk. In a "secret" compartment she found a pair of her underpants, she believed had been ejaculated on. She asked him about the underpants and he became enraged. She found other pieces of her lingere missing after this, but never confronted him about them.

Based on this, your affiants believe Paul Howard Inskeep, Sr. is the perpetrator in all the named offenses.

Mr. Inskeep no longer has the red Chevy Blazer. He has been seen, and is believed to be the exclusive driver of the Audi, bearing Maryland registration VGT-343 and has been observed driving the vehicle. The vehicle is registered to Mr.Inskeep's parents (his father is now deceased).

The Chevrolet Monte Carlo, bearing Maryland registration VNH-215,

has an orange over all appearance, common to vehicles that frequent the grounds of Bethlehem Steel.

The Chrysler LeBaron, bearing Maryland registration PDT-432 is registered to Mr. Inskeep's wife, JoAnn Boyd, and may be used by Mr. Inskeep.

These vehicles, as well as his residence, are believed to contain the listed property to be seized. The basis for this is the expert opinion of Sergeant Sam Bowerman that the type of serial rapist Mr. Inskeep is believed to be is very likely to harbor and maintain mementos taken from their victims.

Sgt. Bowerman's opinion, in detail, is attached and is as follows:

Based upon the research of convicted serial rapists and sex offenders throughout the United States by the Federal Bureau of Investigation (FBI) of which the Baltimore County's Police Department's Criminal Investigative Analyst, Sam Bowerman, was a member of the research team, and the experience of Sam Bowerman in that he has analyzed numerous rape and sex offense cases while assigned to the FBI's Behavioral Sciences Unit for fifteen (15) months, it has been learned that the behavior of the individual as exhibited in this series of crimes, of which probable cause exists to implicate Paul Inskeep as a prime suspect, would be predisposed to the following activites in the planning and carrying out of his criminal activities as they relate to sexual assault;

1. An individual of this type carefully plans out his crimes in advance in that he pre-selects his victims quite frequently through surveillance activities thus establishing the potential victim's routine and lifestyle. In addition, he will prepare for what he considers a "hunt" by dressing in specific clothing and/or bringing certain items with him to assist in preventing his detection and apprehension (gloves, ski mask, various weapons, camera). Also, because this type of offender often engages in a great deal of fantasy prior to and after committing the crime, he has developed a particular method of operation, and set of needs that he will attempt to achieve each and every time he sets out to commit a sexual assault. That is why he becomes a creature of habit once he is successful, he will with little deviation, act in the same manner in most situations. Quite often this type of offender has a need to relive the conquest he feels he has achieved during the course of his original assault, to satisfy this need of conquest and to fuel has fantancy life, he will often take items from the scene of his crimes that may go undetected (i.e. small items of jewelry, lingerie, a victim's driver's license, etc.). Also, because this type of offender often has a victim criteria and enjoys keeping track of his exploits, he will periodically document his experiences with different victims, how they rated sexually, and what his own feelings were during the crime

itself. Quite often this recording of events is accomplished through a personal diary or journal. Not only will this type of offender retain items belonging to his past victims for an indefinite period of time, but he may often have saved news articles detailing the crimes he has committed. A very significant aspect of these sex offenders' behavior that has been established through research and case experiences is that their private collections of items from their crimes is very often secreted in a variety of private places, locations in which they can fantasize aobut the crime through the personal contact with the item without interuption.

The research of sex offenders, specifically serial rapists, indicate that many collects items of pornography, as well as other magazines that assist their fantasy lives such as True Detective, Soldier of Fortune, etc. The significance of these publications to investigators is that very often the offender will replicate those things he has read or observed in these publications during the course of the crimes he commmits.

Office of State's Attorney
Baltimore County
401 Bosley Avenue
Towson, Maryland 21204
(301) 887-6600

Sandra A. O'Connor
State's Attorney

April 9, 1990

Nancy Cohen
Assistant Public Defender
500 Virginia Avenue
Towson, Maryland 21204

Russell White
Suite 1110
300 E. Joppa Road
Towson, maryland 21204

Re: State v. Paul Inskeep
Case Nos.: 89 CR 5882 89 CR 2569
89 CR 6997 89 CR 2296
89 CR 6999 89 CR 2294
89 CR 6998 89 CR 2295
89 CR 7000 89 CR 2570
89 CR 3085

Dear Nancy,

Enclosed herewith, please find the following documents in compliance with discovery in the above-captioned cases:

Sylvia Santana

1. One page police report by Officer McKeloin, dated 1/18/89.
2. One page police report by Officer Minnick, dated 1/18/89.
3. One page police report by Officer McKeloin, dated 1/20/89.
4. One page police report by Officer Tippon, dated 1/18/89.
5. One page police report Detective Roeder, dated 2/8/89.
6. One page police report by Detective Geitoel, dated 2/8/89.
7. One page police report by Detective Geitoel, dated 2/8/89.
8. Six page police report by Detective Ford, dated 1/19/89, 2/9/89, 2/22/89 and 2/28/89.
9. One page correspondence by Detective Ford, dated 2/28/89.
10. One page Statement by Sylvia Santana, dated 2/20/89.
11. One page Statement by Martin Goeller, dated 2/20/89.

FILED APR 23 1990

12. One page Statement by Joseph Swain, dated 2/20/89.

13. One page Statement by Gloria Goeller, dated 2/20/89.

14. Eleven pages of property inventory sheets.

15. One page laboratory examination by Detective Wagster, dated 2/24/89.

16. Two page correspondence by Detective Ford, dated 1/18/89.

ADDITIONAL WITNESSES

Officer Lewis W. Tippon, #1803

Detective James Roeder, #1673
Crime Lab

Special Agent Dwight Adams
F.B.I., Washington, D.C.

Jeannett Stanko

17. Three page police report by Officer Patton, dated 8/24/84.

18. One page police report by Officer Hines, dated 8/24/84.

19. One page police report by Detective Webb, dated 8/24/84.

20. One page police report by Officer Collins, dated 8/24/84.

21. One page police report by Cpl. Rosen, dated 9/11/89.

22. One page police report by Officer DeBoy, dated 8/24/84.

23. One page police report by Officer Wink, dated 8/28/84.

24. One page police report by Detective Valentine, dated 8/28/84.

25. Four pages of property inventory sheets.

26. Four page police report by Detective Ford, dated 2/16/89, 2/9/89, and 2/22/89.

27. Seven page Report ofinvestigation, unsigned, dated 9/13/84.

28. Nine page Report of Investigation, by Officer Coburn, dated 9/17/84.

Witnesses

Mr. & Mrs. Stanko
1461 Clairidge Road
Baltimore, Maryland 21207

Mr. Richard Conner
1212 Harwall Road
Baltimore, Maryland 21207

Officer DeBoy, #2101

Robin Hovermale

29. Four page police report by Officer Kavanaugh, dated 8/16/85.

30. One page police report by Detective Read, dated 8/16/85.

31. One page police report by Detective Einolf, dated 8/24/85.

32. Two page police report by Officer Iser, dated 6/18/86.

33. One page police report by Officer Dorer, dated 8/19/85.

34. One page police report by Detective Ford, dated 8/16/85.

35. Three pages of property inventory sheets.

36. One page police report by Officer Chavis, dated 8/19/85.

37. Two page Statement by Robin Hovermale, dated 6/18/86.

38. One page Evidence Receipt from Cellmark, dated 11/22/89.

39. One page Correspondence by Detective Ford, dated 12/13/89.

40. One page Request for Laboratory Examination, dated 11/7/89.

41. One page Statement by Antony Mouring, dated 8/16/85.

42. One page Report of Investigation by Officer Aksomitus, dated 8/28/85.

43. Seven page police report by Detective Ford, dated 2/22/89, 2/28/89, 2/14/89, and 2/9/89.

44. Four page correspondence by Detective Ford, dated 8/16/85.

45. One page correspondence by Detective Einolf, dated 6/19/86.

64. Seven page Report of Investigation by Officer Collins, dated 1/14/86.

65. Two page correspondence by Detective Einolf, dated 9/6/84.

66. One page correspondence by Sgt. Huggins, dated 9/6/84.

67. One page Report of Investigation by Detective Nash, dated 9/9/84.

68. See 77a.

Witnesses

Detective Sturgen, #277

Salvatore Gilberto
1408 Forrest Park Avenue

Monica Trimp

69. Four page police report by Officer Aksomitus, dated 3/30/85.

70. One page police report by Officer Shaffer, dated 3/30/85.

71. Two page police report by Detective Price, dated 3/30/85.

72. Two page police report by Detective Kolberg, dated 3/30/85.

73. Three paged of property inventory sheets.

74. Two pages police report by Detective Price, dated 5/3/85.

75. One page of property inventory sheet.

76. Four page police report by Detective Ford, dated 3/18/89, 2/9/89, 2/22/89.

77. One page laboratory examination request, dated 4/1/85.
77a. One page report of Investigation by Officers Heavner & Holthaus, dated 1/16/86.
Witnesses

Detective Kolberg, #1566
Crime Lab

Officer Shaffer, #2220

Michele Lay

78. Five page police report by Officer Fares, dated 9/25/88.

79. One page police report by Detective Biltz, dated 9/25/88.

80. One page police report by Detective Ostendarp, dated 10/3/88.

81. Two page police report and photo array by Officer Greenlow, dated 10/4/88.

82. One page police report by Detective Saunders, dated 10/9/88.

83. Three pages of property inventory sheets.

84. One page request for latent print comparison by Detective Ostendarp, dated 10/3/88.

85. One page Report of Investigation by Sgt. Foracappo, dated 10/6/88.

86. Two page correspondence by Sgt. Foracappo, dated 10/3/88.

87. One page correspondence by Detective Saunders, dated 2/14/89.

88. One page correspondence by Detective Ford, dated 2/21/89.

89. One page police report by Detective Ford, dated 4/12/89.

90. Two pages of documents obtained from Defendant's home.

91. One page correspondence by Detective Saunders, dated 2/14/89.

92. One page correspondence by Detective Ford, dated 2/21/89.

Witnesses

Detective Tim Ostendarp, #1693
Crime Lab

Detective Biltz, #1317
Crime Lab

Detective Saunders, #2790
CID Sex Offenses

Dr. Marck Ronnenberg
Union Memorial Hospital
201 E. University Parkway

Mary Foard

93. One page police report by Officer Kitchens, dated 7/27/85.

94. One page police report by Officer Peace, dated 11/27/85.

95. Three page police report by Officer Silk, dated 10/22/85.

96. One page police report by Detective Wagster, dated 10/22/85

97. Two page police report by Detective Peace, dated 11/4/85 and 11/27/85.

98. Three page police report by Detective Ford, dated 2/13/89 and 3/8/89.

99. One page Request for Laboratory Examination by Detective Kolberg, dated 2/14/89.

100. One page Request for Latent print comparison by Detective Ostendarp, dated 3/1/89.

101. Two pages of property inventory sheets.

102. One page Arrest Report of Defendant, dated 3/13/90.

103. Twenty-three pages of documents obtained from Defendant's home.

Witnesses

Detective Wagster, #1804
Crime Lab

Detective Tim Ostendarp, #1613
Crime Lab

Detective Kolberg, #1566
Crime Lab

Officer M. Stutman, #2884

Mary Jane Foard 82'

104. Six page police report by Officer May, dated 3/2/82.

105. One page arrest report on Defendant, dated 3/2/82.

106. One page police report by Officer May, dated 3/2/82.

107. One page police report by Detective Kolberg, dated 3/2/82.

108. One page police report by Cpl. Simms, dated 3/3/82.

109. One page police report by Officer Mayes, dated 3/2/82.

110. One page police report by Officer long, dated 3/2/82.

111. One page police report by Detective Kolberg, dated 3/2/82.

112. One page police report by Officer Phoore, dated 3/3/82.

113. One page property inventory sheet.

114. Four pages of property inventory sheets.

115. Two page police report by Officer Mayos, dated 3/4/82 and 6/3/82.

116. One page police by Sgt. Carlin, dated 7/21/82.

117. Six page Statement by Renee Hammel, dated 3/2/82.

118. Two page Statement by Ronald Cloud, dated 3/4/82.

119. One page Statement by Lillian Albrecht, dated 3/2/82.

120. Four page Statement by Mary Foard, dated 3/2/82.

Mary Foard 81'

121. Two page police report by Officer Banana, dated 11/20/81.

122. One page arrest report on Defendant, dated 12/7/81.

123. One page Statement by Renee Hammel, dated 11/21/81.

124. Two pages of property inventory sheets.

Jeanne Gibson

125. Two page police report by Officer Stutman, dated 7/30/86.

126. Two page police report by Sgt. Murphy, dated 3/6/89.

127. One page police report by Detective Ford, dated 3/8/89.

128. One page property inventory sheet.

129. Two page police report by Officer Shaffer, dated 7/8/86.

130. One page police report by Det. Ford, dated 3/24/89.

131. One page arrest report of the Defendant, dated 3/24/89.

132. One page Statement by Jeanne Gibson, dated 3/6/89.

133. Six page Report of Investigation by Officer Collins, dated 8/1/86.

134. Three pages of documents obtained from Defendant's home.

Kathleen Grannas

135. Four page police report by Officer Holthaus, dated 12/7/86.

136. One page police report by Detective Saunders, dated 3/14/89.

137. One page police report by Detective Ford, dated 3/13/89.

138. Two pages of property inventory sheets.

139. One page police report by Detective Ford, dated 3/24/89.

140. One page arrest report of Defendant, dated 3/24/89.

141. One page Statement by Ms. Grannas, dated 5/13/89.

Witnesses

Officer James Holthaus, #1956

Lynn Sevil

142. Three page police report by Officer Fox, dated 9/24/85.

143. One page police report by Cpl. Niemczyk, dated 9/24/85.

144. Two page police report by Detective Valentine, dated 10/2/85.

145. One page police report by Officer Collins, dated 1/8/86.

146. Four page police report by Detective Ford, dated 2/9/89, 2/16/89 and 2/22/89.

147. One page property inventory sheet.

148. One page of documents obtained from Defendant's home.

149. One page request for laboratory examination, dated 2/17/89.

150. One page Crime Laboratory Report by Joan Murley and Detective Kolberg, dated 2/22/89.

151. One page Field Interrogation Report by Officer Fox, dated 1/1/86.

152. Three page police report by Officer Patton, dated 9/20/85 and 9/24/85.

Witnesses

Cpl. H. Niemczyk, #1459

Officer Patton, #1461

Kelly Nelson

153. Four page police report by Officer May, dated 11/8/84.

154. One page police report by Officer Aksomifus, dated 11/8/84.

155. One page police report by Detective Valentine, dated 11/9/84.

156. One page police report by Detective Ford, dated 2/20/89.

157. One page Statement by Betty Nelson, dated 2/20/89.

158. Seven pages of property inventory sheets.

159. One page police report by Detective Roeder, dated 11/8/84.

160. One page request for laboratory examination by Detective Kolberg, dated 2/20/89.

161. Two page correspondence by Detective Capel, dated 11/8/84.

162. One page Statement by Kelly Rucker, dated 3/4/89.

Witnesses

Detective Roeder, #1673
Crime Lab

Detective Capel, #1425
CID Homicide Division

163. Eleven pages of address book obtained from Defendant's home.

164. Eleven pages of phone book obtained from Defendant's home.

Michelle Hauswald

165. Two page police report by Officer Patton, dated 3/21/88.

166. One page police report by Detective Ford, dated 3/17/89.

Panericia Berg

167. Two page Statement by Michelle Hauswald, dated 3/17/89.
168. One page police report by Officer Baummer, dated 9/30/82.

169. One page police report by Detective Ford, dated 3/17/89.

Debra Cirk

170. Two page police report by Officer Munson, dated 8/5/84.

171. One page police report by Detective Biltz, dated 8/5/84.

172. One page Request for Latent Prints Comparison by Detective Ostendarp, dated 2/24/89.

173. One page copy of Comcast Cablevision, dated 10/31/86.

Wanda Banas

174. Three page police report by Officer May, dated 7/10/84.

175. Two pages of property inventory sheets.

176. One page police report by Detective Bell, dated 7/10/84.

177. Five page police report by Detective Sciascia, dated 7/19/84, 8/22/84 and 7/18/84.

178. Four page Report of Investigation by Detective Sciascia, dated 7/19/84 and 7/25/84.

179. One page Statement byy Patricia Banas, dated 7/10/84.

180. One page Statement by Michelle Banas, dated 7/10/84.

181. Six page medical examination by Drs. Meeks and Morhaim, dated 7/10/84.

182. One page police report re: Glee Moore by Officer Murphy, dated 11/7/83.

183. One page police report re: John Sculla by Officer Czyzowski, dated 4/19/84.

184. One page police report by Officer Martin, dated 4/19/84.

185. Two page police report re: James Whitener by Officer Williams, dated 8/10/84.

Kimmberly Brydge

186. Three page police report by Officer Kavanaugh, dated 1/1/86.

187. One page police report by Officer Merson, dated 1/1/86.

188. One page police report by Officer Fox, dated 1/9/86.

189. One page police report by Officer Dorer, dated 1/1/86.

190. Three page police report by Detective Ford, dated 2/22/89 and 2/9/89

191. Two page untitled report, without date or author noted.

Joann Asbury

192. Three page police report by Officer Ash, dated 9/19/80.

193. Three page police report by Detective Price, dated 9/26/80.

194. One page police report by Detective Russey, dated 9/29/80.

195. One page police report by Officer Ash, dated 9/19/80.

196. One page police report by Detective Biltz, dated 9/19/80.

197. One page police report by Cp. Simms, dated 9/24/80.

198. Three pages of property inventory sheet.

199. One page Statement by Joanna Asbury, dated 9/19/80.

200. One page arrest report on Norman Pfeltz, dated 9/24/80.

201. One page police report by Detective Biltz, dated 9/26/80.

202. Two page police report by Detective Price, dated 9/24/80.

203. One page Arrest Report on the Defendant, dated 9/26/80.

204. One page property inventory sheet.

205. One page police report by Detective Price, dated 10/14/80.

206. One page Statement by Joanna Asbury, dated 9/19/80.

207. One page police Report by Joan Murley, dated 8/24/81.

208. One page police report by George Carlin, dated 1/19/80.

209. One page police report by Officer Kroner, dated 2/23/81.

210. one page correspondence re: Joanna Asbury's arrest in Baltimore City.

211. Two page Witness Line-up identification and statements of Asbury dated 9/26/80.

212. Eight page correspondence by Detective Price, dated 9/25/80.

213. Two page police report by Officer Enders, dated 12/4/86.

214. Two page police report by Officer Duty, dated 1/23/88.

The State has heretofore filed the State's Automatic Discovery and Request for Discovery. The State's obligation in Discovery is continuing in nature.

Sincerely,

Mickey J. Norman
Assistant State's Attorney
for Baltimore County

Robin S. Coffin
Assistant State's Attorney
for Baltimore County

MJN:RSC/mas

STATE OF MARYLAND	*	IN THE CIRCUIT COURT	
VS	*	FOR BALTIMORE COUNTY	
PAUL H. INSKEEP	*	CASE NOS. 89 CR 2294	89 CR 7000
		89 CR 2295	89 CR 6997
	*	89 CR 2570	89 CR 6998
		89 CR 3085	89 CR 6999
	*	89 CR 5882	89 CR 2569
		89 CR 2296	

* * * * * * *

MOTION FOR BIFURCATION OF TRIAL

Defendant, Paul H. Inskeep, by his attorneys, Nancy M. Cohen and Russell White, hereby moves for bifurcation of his trial pursuant to Rule 4-314 and says:

1. Defendant has entered pleas of not guilty and not criminally responsible in each of the above captioned cases.

2. Defendant elects to be tried by a jury in each of the above captioned cases.

3. Defendant moves for a bifurcated trial in which the issue of criminal responsibility will be heard and determined separately from the issue of guilt. Md. Rule 4-314.

WHEREFORE, Defendant prays this Honorable Court:

A. Hold a hearing on this Motion;

B. Grant Defendant's Motion for Bifurcation of Trial;

C. Grant such additional relief as may be appropriate.

Respectfully submitted,

Nancy M. Cohen
Assistant Public Defender
500 Virginia Avenue
Towson, Maryland 21204
321-3779

FILED MAY 01 1990

Russell White

Russell White, Esq.
Suite 1110
300 E. Joppa Road
Towson, Maryland 21204
583-1325

Points and Authorities

Md. Rule 4-314
Treece v. State, 313 Md. 665 (1988)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY this 1st day of May, 1990 that a copy of the foregoing Motion was delivered to Mickey Norman and Robin Coffin, Assistant State's Attorney's for Baltimore County, County Courts Building, Towson, MD 21204.

Nancy M. Cohen

Nancy M. Cohen
Assistant Public Defender

Office of State's Attorney
Baltimore County
401 Bosley Avenue
Towson, Maryland 21204
(301) 887-6600

Sandra A. O'Connor
State's Attorney

April 16, 1990

Nancy Cohen
500 Virginia Avenue
Towson, Maryland 21204

Re: State v. Paul Inskeep
Case No.: 89 CR 5882 89CR 2294
file in all cases 89CR 2295
89CR 2296
89CR 2569
89CR 2570
89CR 3085
89CR7000
89CR6999
89CR6998
89CR6997

Dear Nancy:

Enclosed please find the following:

1. Five page correspondance from John Hicks, dated 4/6/90.

2. Thirty-three pages of "Procedures for the Detection of Restriction Fragment Length Polymorphisms in Human DNA."

3. Three pages of "Sample Population Statistics."

4. Twenty pages of "A Statistical Approach for Vntr Analysis" by Bruce Bruce Budowle and Keith L. Monson.

5. Twenty-three pages of FBI Report and related notes, re: Sylvia Santana.

6. Ten copies of autoradiography developed in Santana.

Additional DNA discovery will follow regarding the names and addresses of all technicians who participated in the Santana tests.

Sincerely,

Mickey Norman

Mickey J. Norman
Assistant State's Attorney
for Baltimore County

Robin S. Coffin
Assistant State's Attorney
for Baltimore County

cc: Russell White

MJN:RSC/mas

FILED APR 26 1990

COURT CLERK'S WORK SHEET

TRIAL DATE May 22, 1990 Judge JWH

R. Coffin — STATE'S ATTORNEY

N. Cohen, R. White — DEFENDANT'S ATTORNEY

M. Naumann — COURT REPORTER

MC — CLERK

CASE # 89CR6997 NAME Paul Lunskeep

~~CHARGE~~ Postponement Hearing

~~TRIAL~~ A/H ~~COURT JURY~~ PLEA GUILTY NOT GUILTY NOLO CONTENDERE

MOTIONS: 1. END of STATE'S CASE defs. Motion for Judgment of ACQUITTAL

GRANTED OVERRULED

2. END of ENTIRE CASE defs. Motion For Judgment of ACQUITTAL

GRANTED OVERRULED

VERDICT: GUILTY ON COUNTS NOT GUILTY ON COUNTS

SENTENCE	TERM OF	SUSPENDED	PROB.	FINE & COSTS
Department of Correction				
Balto. Co. Detention Center				

REMARKS A's Request for PPD - Granted. Good Cause shown. A remanded BCDL

Hicks previously waived.

T/D
6/4/90

NOTE: IF PRE-SENTENCE REPORT IS ORDERED OR DEFENDANT IS ON PROBATION — DEFENDANT MUST REPORT TO PROBATION DEPARTMENT FIFTH FLOOR, ROOM 508, COUNTY COURTS BUILDING IMMEDIATELY WITH COUNSEL.

L-101

CIRCUIT COURT FOR BALTIMORE COUNTY

Towson, Maryland 21204

District Court Case No. 89CR3085, 5882, 6997/98/99

Case Nos. 7000, 2294/95/96
2569/70

May 22, 19 90

REPORT OF PRISONER BROUGHT TO COURT FOR TRIAL

FROM: SUZANNE MENSH, Clerk

TO: THE SHERIFF OF BALTIMORE COUNTY, MARYLAND

Name Of Prisoner Paul Innskeep

Date Of Trial 5/22, 1990 Judge J.W. Hinkel

Charge ---------- Guilty ---------- NOT GUILTY ----------

DISPOSITION:

A. Sentenced To Department Of Correction ----------
Length Of Sentence

B. Sentenced To Baltimore County Detention Center ----------
Length Of Sentence

(C.) Remanded To Baltimore County Detention Center ✓ ----------
~~Probation Report Of Psychiatric Evaluation~~

D. Placed On Probation ----------
Length Of Probation

E. Sentenced To Baltimore County Detention Center Work Release Recommended ----------

---

F. Stet ----------

G. Nol Pros ----------

H. Arraignment ----------

I. Trial Continued ----------

(J.) Trial Postponed ✓ ----------

K. Bail Hearing ----------

L. Defendant Released From This Case Only.
Release In Transit.

SUZANNE MENSH, CLERK

Per [signature]
Deputy Clerk

COURT CLERK'S WORK SHEET

TRIAL DATE June 4, 1990 Judge James T. Smith Jr

M. Norman / R. Coffin — STATE'S ATTORNEY
N. Cohen — DEFENDANT'S ATTORNEY

~~Tony Greaver~~ / C. Trainor — COURT REPORTER
Bruce Hall — CLERK

CASE # 89CR6997 NAME Inskeep, Paul H.

CHARGE Rape (Motions hearing had)

TRIAL ____ PLEA ____
COURT JURY GUILTY NOT GUILTY NOLO CONTENDERE

MOTIONS: 1. END of STATE'S CASE defs. Motion for Judgment of ACQUITTAL

GRANTED OVERRULED

2. END of ENTIRE CASE defs. Motion For Judgment of ACQUITTAL

GRANTED OVERRULED

VERDICT: GUILTY ON COUNTS NOT GUILTY ON COUNTS

SENTENCE	TERM OF	SUSPENDED	PROB.	FINE & COSTS
Department of Correction				
Balto. Co. Detention Center				

REMARKS F.B.I's Motion to Quash subpoena: GRANTED. Defdts Motion to declare Rule 10-915 unconstitutional: Denied in part, Reserved in part: States Motion to join cases: Reserved. Defdts Motion for bifurcation: GRANTED. Defdts Motion for protective Order: GRANTED, Order to be filed. Defdts request for supplementary Discovery: GRANTED. to be supplied by 7/15/90. Defdt remand BCDC.

NOTE: IF PRE-SENTENCE REPORT IS ORDERED OR DEFENDANT IS ON PROBATION — DEFENDANT MUST REPORT TO PROBATION DEPARTMENT FIFTH FLOOR, ROOM 508, COUNTY COURTS BUILDING **IMMEDIATELY WITH COUNSEL.**

COURT CLERK'S WORK SHEET

TRIAL DATE 07/30/90 Judge Smith

R. Coffie / M. Norman — STATE'S ATTORNEY
R. White — DEFENDANT'S ATTORNEY

Tony Greiver — COURT REPORTER
Bruce Hall — CLERK

CASE # 89CR6997 NAME Paul Inskeep

CHARGE

TRIAL ____ PLEA ____
COURT JURY — GUILTY — NOT GUILTY — NOLO CONTENDERE

MOTIONS: 1. END of STATE'S CASE defs. Motion for Judgment of ACQUITTAL

GRANTED — OVERRULED

2. END of ENTIRE CASE defs. Motion For Judgment of ACQUITTAL

GRANTED — OVERRULED

VERDICT: GUILTY ON COUNTS — NOT GUILTY ON COUNTS

SENTENCE	TERM OF	SUSPENDED	PROB.	FINE & COSTS
Department of Correction				
Balto. Co. Detention Center				

REMARKS Hearing PPD.
Deft remanded BCDC.

NOTE: IF PRE-SENTENCE REPORT IS ORDERED OR DEFENDANT IS ON PROBATION — DEFENDANT MUST REPORT TO PROBATION DEPARTMENT FIFTH FLOOR, ROOM 508, COUNTY COURTS BUILDING IMMEDIATELY WITH COUNSEL.

(no file)

COURT CLERK'S WORK SHEET

TRIAL DATE 12/17/90 Judge Smith

R. Coffin — STATE'S ATTORNEY

N. Cohen/R. White — DEFENDANT'S ATTORNEY

A. Greaver — COURT REPORTER

B Hall — CLERK

CASE # 89CR6997 NAME Paul Inskeep

CHARGE

TRIAL _____ PLEA _____

COURT JURY GUILTY NOT GUILTY NOLO CONTENDERE

MOTIONS: 1. END of STATE'S CASE defs. Motion for Judgment of ACQUITTAL

GRANTED OVERRULED

2. END of ENTIRE CASE defs. Motion For Judgment of ACQUITTAL

GRANTED OVERRULED

VERDICT: GUILTY ON COUNTS NOT GUILTY ON COUNTS

SENTENCE	TERM OF	SUSPENDED	PROB.	FINE & COSTS
Department of Correction				
Balto. Co. Detention Center				

REMARKS NOL PROS. Defdt present.

~~Defdt to be released BCDC As for this case only. Release Form sent.~~

NOTE: IF PRE-SENTENCE REPORT IS ORDERED OR DEFENDANT IS ON PROBATION — DEFENDANT MUST REPORT TO PROBATION DEPARTMENT FIFTH FLOOR, ROOM 508, COUNTY COURTS BUILDING IMMEDIATELY WITH COUNSEL.

(No file)