

IN THE CIRCUIT COURT FOR CHARLES COUNTY, MARYLAND

STATE OF MARYLAND

VS.

RALPH MARVIN VANDYKE, JR
111 Cardinal Court
La Plata, MD 20646
W M DOB: 04/17/1959

Criminal Case No. C-08-CR-18-000392
Tracking No. 187008001504

FILED

MAY 18 2018

CIRCUIT COURT
FOR CHARLES CO., MD.

INDICTMENT

STATE OF MARYLAND, CHARLES COUNTY, TO WIT:

The Grand Jurors of the State of Maryland, for the body of Charles County, on their oath do present that **RALPH MARVIN VANDYKE, JR**, late of said County, between on or about January 1, 2016 and November 14, 2017, at Charles County, Maryland, the State being unable to be more specific because of the youthful age of the victim and the victim's inability to provide specific dates, did cause sexual abuse; to wit: sexual exploitation, to [REDACTED] a minor, said Ralph Marvin Vandyke, Jr. being an other person, who has temporary care, custody and responsibility for supervision of said minor, in violation of Criminal Law Article, Section 3-602(b)(1) of the Annotated Code of Maryland, and against the peace, government and dignity of the State. (Sex Abuse Minor: Custody Criminal Law Article, Section 3-602(b)(1))

Count 2

And the Jurors aforesaid, upon their oath aforesaid, do further present the said **RALPH MARVIN VANDYKE, JR**, late of said County, between on or about August 1, 2017 and November 14, 2017, at Charles County, Maryland, the State being unable to be more

specific because of the youthful age of the victim and the victim's inability to provide specific dates, did assault [REDACTED] in the second degree, in violation of Criminal Law Article, Section 3-203(a) of the Annotated Code of Maryland, and against the peace, government, and dignity of the State. (Assault Second Degree Criminal Law Article, Section 3-203(a))

Count 3

And the Jurors aforesaid, upon their oath aforesaid, do further present the said **RALPH MARVIN VANDYKE, JR**, late of said County, between on or about January 1, 2017 and June 1, 2017, at Charles County, Maryland, the State being unable to be more specific because of the youthful age of the victim and the victim's inability to provide specific dates, did cause sexual abuse; to wit: sexual exploitation and sexual offense 4th degree, to [REDACTED] a minor, said Ralph Marvin Vandyke, Jr. being an other person, who has temporary care, custody and responsibility for supervision of said minor, in violation of Criminal Law Article, Section 3-602(b)(1) of the Annotated Code of Maryland, and against the peace, government and dignity of the State. (Sex Abuse Minor: Custody Criminal Law Article, Section 3-602(b)(1))

Count 4

And the Jurors aforesaid, upon their oath aforesaid, do further present the said **RALPH MARVIN VANDYKE, JR**, late of said County, between on or about January 1, 2017 and June 1, 2017, at Charles County, Maryland, the State being unable to be more specific because of the youthful age of the victim and the victim's inability to provide specific

dates, did commit a sexual offense in the fourth degree upon [REDACTED], a minor, by engaging in sexual contact, to wit: did place arm around [REDACTED] and rub neck and jaw of [REDACTED] with hand, who at the time of the sexual contact was a student enrolled at the school where said Ralph Marvin Vandyke Jr, being a person in a position of authority, was employed, in violation of Criminal Law Article, Section 3-308(c)(1) of the Annotated Code of Maryland, and against the peace, government and dignity of the State. (Sexual Offense Fourth Degree Criminal Law Article, Section 3-308(c)(1))

Count 5

And the Jurors aforesaid, upon their oath aforesaid, do further present the said **RALPH MARVIN VANDYKE, JR**, late of said County, between on or about December 1, 2015 and November 14, 2017, at Charles County, Maryland, the State being unable to be more specific because of the youthful age of the victim and the victim's inability to provide specific dates, did cause sexual abuse; to wit: sexual exploitation and sexual offense 4th degree, to [REDACTED], a minor, said Ralph Marvin Vandyke Jr. being an other person, who has temporary care, custody and responsibility for supervision of said minor, in violation of Criminal Law Article, Section 3-602(b)(1) of the Annotated Code of Maryland, and against the peace, government and dignity of the State. (Sex Abuse Minor: Custody Criminal Law Article, Section 3-602(b)(1))

Count 6

And the Jurors aforesaid, upon their oath aforesaid, do further present the said **RALPH MARVIN VANDYKE, JR**, late of said County, between on or about December 1, 2015

and November 14, 2017, at Charles County, Maryland, the State being unable to be more specific because of the youthful age of the victim and the victim's inability to provide specific dates, did commit a sexual offense in the fourth degree upon [REDACTED], a minor, by engaging in sexual contact, to wit: did rub arm of [REDACTED] with his hand and kiss forehead of [REDACTED] who at the time of the sexual contact was a student enrolled at the school where said Ralph Marvin Vandyke Jr, being a person in a position of authority, was employed, in violation of Criminal Law Article, Section 3-308(c)(1) of the Annotated Code of Maryland, and against the peace, government and dignity of the State. (Sexual Offense Fourth Degree Criminal Law Article, Section 3-308(c)(1))

Count 7

And the Jurors aforesaid, upon their oath aforesaid, do further present the said **RALPH MARVIN VANDYKE, JR**, late of said County, between on or about August 1, 2010 and May 22, 2012, at Charles County, Maryland, the State being unable to be more specific because of the youthful age of the victim and the victim's inability to provide specific dates, did cause sexual abuse; to wit: sexual exploitation and sexual offense 4th degree, to [REDACTED], a minor, said Ralph Marvin Vandyke, Jr. being an other person, who has temporary care, custody and responsibility for supervision of said minor, in violation of Criminal Law Article, Section 3-602(b)(1) of the Annotated Code of Maryland, and against the peace, government and dignity of the State. (Sex Abuse Minor: Custody Criminal Law Article, Section 3-602(b)(1))

Count 8

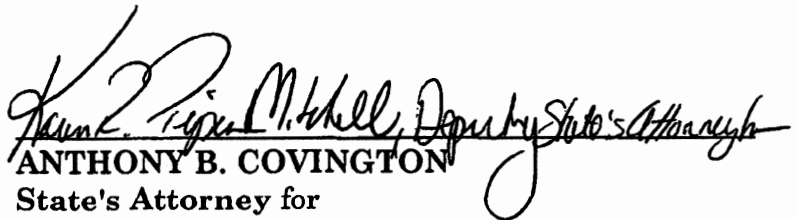
And the Jurors aforesaid, upon their oath aforesaid, do further present the said **RALPH MARVIN VANDYKE, JR**, late of said County, between on or about August 1, 2008 and June 30, 2011, at Charles County, Maryland, the State being unable to be more specific because of the youthful age of the victim and the victim's inability to provide specific dates, did cause sexual abuse; to wit: sexual exploitation and sexual offense 4th degree, to [REDACTED], a minor, said Ralph Marvin Vandyke, Jr. being an other person, who has temporary care, custody and responsibility for supervision of said minor, in violation of Criminal Law Article, Section 3-602(b)(1) of the Annotated Code of Maryland, and against the peace, government and dignity of the State. (Sex Abuse Minor: Custody Criminal Law Article, Section 3-602(b)(1))

Count 9

And the Jurors aforesaid, upon their oath aforesaid, do further present the said **RALPH MARVIN VANDYKE, JR**, late of said County, between on or about August 1, 2009 and June 30, 2011, at Charles County, Maryland, the State being unable to be more specific because of the youthful age of the victim and the victim's inability to provide specific dates, did cause sexual abuse; to wit: sexual exploitation and sexual offense 4th degree, to [REDACTED], a minor, said Ralph Marvin Vandyke, Jr. being an other person, who has temporary care, custody and responsibility for supervision of said minor, in violation of Criminal Law Article, Section 3-602(b)(1) of the Annotated Code of Maryland, and against the peace, government and dignity of the State. (Sex Abuse Minor: Custody Criminal Law Article, Section 3-602(b)(1))

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. If you have been served with a citation or summons directing you to appear before a judicial officer for a preliminary inquiry at a date and time designated or within five days of service if no time is designated, a judicial officer will advise you of your rights, the charges against you, and penalties. The preliminary inquiry will be cancelled if a lawyer has entered an appearance to represent you.
4. You have the right to have a lawyer.
5. 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.
6. Even if you plan to plead guilty, a lawyer can be helpful.
7. If you are eligible, the Public Defender or a court-appointed attorney will represent you at any initial appearance before a judicial officer and at any proceeding under Rule 4-216.1 to review an order of a District Court commissioner regarding pretrial release. If you want a lawyer for any further proceeding, including trial, 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.
8. 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.
9. **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.


ANTHONY B. COVINGTON
State's Attorney for
Charles County, Maryland

CRIMINAL TRIALS
No. JANUARY Term, 2018
STATE OF MARYLAND


vs.

RALPH MARVIN VANDYKE, JR

INDICTMENT

TRUE BILL

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 Foreman

Filed: _____, 2018

Witness: Keith Moody

aeb

Sex Abuse Minor
Assault-Second Degree
Sex Abuse Minor
Sex Off 4Th- Pers Pos Auth
Sex Abuse Minor
Sex Off 4Th- Pers Pos Auth
Sex Abuse Minor
Sex Abuse Minor
Sex Abuse Minor