

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Southern Division)**

**ARTIE COFIELD,**  
c/o Brown, Goldstein & Levy, LLP  
120 E. Baltimore St., Ste. 2500  
Baltimore, MD 21202

Plaintiff,

v.

**CHARLES COUNTY CORPORAL  
ANDREA WORLEY, individually and  
in her official capacity**

██████████

██████████, and,

**CHARLES COUNTY MASTER  
SERGEANT TIMOTHY MINER,  
individually and in his official capacity,**

██████████

██████████,

Defendants.

Civil Action No. 8:26-cv-1909

**JURY DEMAND**

**COMPLAINT**

Plaintiff Artie Cofield files this Complaint against Charles County Corporal Andrea Worley, individually and in her official capacity, and Charles County Master Sergeant Timothy Miner, individually and in his official capacity (collectively, “Defendants”), for violating his rights and causing his wrongful arrest and incarceration.

**INTRODUCTION**

1. Plaintiff Artie Cofield lost nearly three years of his life defending himself against a murder charge for a crime he did not commit.

2. On February 12, 2022, while traveling with his family, Mr. Cofield was arrested in Wichita Falls, Texas, and charged with the first-degree murder of Herbert Andrei James in Charles County, Maryland.

3. Mr. Cofield's arrest and prosecution were the direct result of Corporal Andrea Worley's fabrication of evidence and inclusion of false statements in charging documents that she signed under penalty of perjury.

4. Despite indications of Mr. Cofield's innocence, including a complete absence of physical evidence linking him to the crime, Corporal Worley charged him based on three demonstrably false statements that she later admitted—under oath— were false.

5. On March 5, 2025, after enduring incarceration, house arrest, and a protracted criminal prosecution, a Charles County jury found Mr. Cofield not guilty on all counts.

6. The Charles County Sheriff's Office conducted an internal affairs investigation and sustained a complaint against Corporal Worley based on her conduct in Mr. Cofield's criminal case.

7. Even after his acquittal, Mr. Cofield continues to experience severe emotional distress from the harm he experienced.

8. This lawsuit seeks redress for Mr. Cofield's injuries resulting from Defendants' misconduct that stripped him of his liberty, traumatized him and his family, and labeled him publicly as a murderer.

### **JURISDICTION AND VENUE**

9. This action is brought pursuant to 42 U.S.C. § 1983 to redress the deprivation under color of law of Mr. Cofield's rights as secured by the United States Constitution.

10. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1367.

11. Venue is proper under 28 U.S.C. § 1391(b) because the events giving rise to this complaint occurred in this judicial district.

12. On January 16, 2026, counsel for Mr. Cofield sent the Treasurer of the State of Maryland notice of his claims.

13. The State acknowledged receipt of Mr. Cofield's claim in a letter dated January 21, 2026, but provided no substantive response.

### **THE PARTIES**

14. Plaintiff Artie Cofield is 55 years old. He resides in Richmond, Virginia with his wife and their minor son and daughter.

15. Defendant Andrea Worley is a Corporal with the Charles County Sheriff's Office. Beginning on or around August 28, 2021, Corporal Worley served as the lead investigator in the homicide case that resulted in Mr. Cofield's wrongful arrest and prosecution. The investigation into Herbert Andrei James's death was Corporal Worley's first homicide investigation as lead detective. Corporal Worley acted under color of law and within the scope of her employment. Mr. Cofield sues Corporal Worley in her individual and official capacities.

16. Defendant Timothy Miner was a Master Sergeant with the Charles County Sheriff's Office until his retirement in or around August 2023. At all times relevant to this Complaint, Master Sergeant Miner held a supervisory role in the investigation of the death of Herbert Andrei James, including attending at least one meeting with the State's Attorney's Office regarding whether to charge Mr. Cofield and directly supervising Corporal Andrea Worley. Master Sergeant Miner acted under color of law and within the scope of his employment. Mr. Cofield sues Master Sergeant Miner in his individual and official capacities.

**FACTUAL BACKGROUND**

**I. Mr. Cofield Was Not Involved in the Murder of Herbert Andrei James**

17. On the evening of October 10, 2020, Herbert Andrei James went to the MGM National Harbor Casino (“MGM”) in Oxon Hill, Maryland, where he won around \$7,900 while gambling.

18. Mr. Cofield was also at MGM that evening and spent time with Mr. James, whom he knew as a friend.

19. Mr. James collected his winnings and left the casino with Mr. Cofield around 10:28 p.m.

20. Mr. James and Mr. Cofield went grocery shopping and took the groceries back to Mr. James’s apartment in Waldorf, Maryland. Mr. Cofield then departed Mr. James’s apartment. He made his way to Chicago, Illinois to attend to a family matter.

21. While traveling Mr. Cofield called Mr. James on October 22, 2020, and October 25, 2020, but could not reach Mr. James.

22. On October 27, 2020, Charles County Sheriff’s deputies responded to a call at Mr. James’s apartment building. Deputies found Mr. James inside his residence with an apparent gunshot wound to the back of his head. Mr. James’s casino winnings were not found at the crime scene.

23. The Office of the Chief Medical Examiner ruled Mr. James’s death a homicide.

24. The original lead investigator on the case was Sergeant Charles Garner of the Charles County Sheriff’s Office.

25. Sergeant Garner was supervised by Master Sergeant Timothy Miner.

26. After a witness told the Sheriff's deputies that Mr. James had been seen with Mr. Cofield at MGM on October 10, 2020, the Sheriff's Office immediately focused its investigation on Mr. Cofield to the exclusion of other individuals.

27. After learning of Mr. James's death from the Sheriff's Office, Mr. Cofield called the Sheriff's Office back twice on October 27, 2020, using the non-emergency phone number, but his calls went unanswered and were ignored.

28. The evidence overwhelmingly indicated that Mr. Cofield was not involved in Mr. James's death.

29. No gun was ever recovered that linked Mr. Cofield to the crime.

30. The Sheriff's Office recovered a bullet from the crime scene, but Defendants never submitted it to the National Integrated Ballistic Information Network (NIBIN) to compare the bullet against evidence from across the country and trace the gun that fired the bullet.

31. No physical evidence connected Mr. Cofield to the crime scene.

32. Mr. Cofield's DNA was compared to DNA evidence obtained from the crime scene, and he could not be included as a contributor to the DNA profiles found there.

33. Moreover, the course of the investigation offered multiple alternative explanations and suspects that the Sheriff's Office, including Defendants, failed to pursue.

34. The Sheriff's Office learned from a witness that Mr. James had gotten into an argument with another individual shortly before leaving MGM on the night of the murder. Defendants never investigated who this person was or whether they might have been involved in Mr. James's murder.

35. The Sheriff's Office learned from another witness that Mr. James was in the habit of circling the block outside of MGM to avoid being followed home. This witness thought that Mr. James may have been followed home from MGM. Detectives never investigated this lead.

36. In the hours immediately after Mr. James left MGM on October 10, 2020, he received at least five text messages from different numbers asking him for money, demonstrating that multiple individuals knew he had won a substantial sum and wanted access to those funds. Defendants never investigated these individuals or determined whether any of them might have been involved in Mr. James's death.

37. Surveillance video from MGM showed Mr. James giving cash to other individuals while at the casino on October 10, 2020. The Sheriff's Office never attempted to identify or speak with these individuals.

38. When interviewed by the Sheriff's Office, two of Mr. James's neighbors reported hearing a gunshot or shots during the mid to late afternoon or early evening—times when law enforcement knew Mr. Cofield was not at Mr. James's apartment.

39. On October 19, 2020—eight days before Mr. James's body was discovered—a friend found Mr. James's apartment door locked when attempting to check on him.

40. However, on October 27, 2020, when Sheriff's Office deputies arrived at Mr. James's apartment, Mr. James's apartment door was unlocked.

41. This discrepancy suggests that someone had access to Mr. James's apartment or a key to it during the intervening eight days. It could not have been Mr. Cofield, who was in Mississippi during this time frame.

42. Despite knowing that Mr. James's door had been locked on October 19, 2020, the Sheriff's Office failed to investigate this lead or to obtain CCTV footage from Mr. James's apartment complex for the period that footage was available—October 17 to October 27, 2020.

43. The lack of physical evidence, the presence of alternative suspects, the locked door discrepancy, and the absence of any forensic link between Mr. Cofield and the crime scene all pointed to Mr. Cofield's innocence.

## **II. The Sheriff's Office Conducts an Insufficient Investigation to Charge Mr. Cofield**

44. The investigation into Mr. James's death began immediately after his body was discovered on October 27, 2020.

45. The Sheriff's Office immediately targeted Mr. Cofield as a subject and began issuing subpoenas for information about him on October 28, 2020, the day after Mr. James's body was found.

46. Over the following months, the Sheriff's Office obtained extensive records about Mr. Cofield through subpoenas and search warrants, including phone records, casino records, social media records, location data, and financial records.

47. At some time between April 2021 and July 2021, Sergeant Garner met with the Charles County State's Attorney's Office to discuss whether to charge Mr. Cofield with Mr. James's murder.

48. At Sergeant Garner's direction, another detective prepared a PowerPoint presentation of the evidence collected to date in anticipation of this meeting. Sergeant Garner reviewed and validated this PowerPoint.

49. Upon information and belief, multiple prosecutors and Master Sergeant Miner were also present at this meeting.

50. At this meeting, Sergeant Garner advised the prosecutors that he believed all investigative leads had been exhausted.

51. At this meeting, the State's Attorney's Office declined to support charging Mr. Cofield based on the investigation Sergeant Garner had conducted to date.

### **III. The Case is Reassigned to Corporal Worley**

52. On or around August 28, 2021, following Sergeant Garner's promotion to a different position, the case was reassigned to Corporal Andrea Worley.

53. This homicide investigation was Corporal Worley's first homicide investigation as a lead detective.

54. Corporal Worley was supervised by Master Sergeant Miner.

55. According to the operative Administrative and Operational Manual of the Charles County Sheriff's Office (the "Manual"), as a Master Sergeant, Master Sergeant Miner was "responsible for first-line supervisory work."

56. According to the Manual, as Corporal Worley's supervisor, Master Sergeant Miner was responsible for Corporal Worley's "conduct and activities."

57. Upon information and belief, Master Sergeant Miner's responsibilities as a supervisor included reviewing and signing off on reports and other work product prepared by Corporal Worley as well as ensuring that Corporal Worley complied with Sheriff's Office policies in her investigations.

58. Master Sergeant Miner knew, or should have known, that this homicide investigation was Corporal Worley's first homicide investigation as a lead detective.

59. When Corporal Worley took over the investigation, she reviewed the records that had already been gathered, including the PowerPoint presentation made under Sergeant Garner's direction to summarize the evidence.

60. Corporal Worley did not conduct any meaningful new investigation after taking over the case.

61. Apart from speaking to a witness in November 2021 to confirm Mr. Cofield's contact information, Corporal Worley did not reach out to any witnesses who had been previously identified by Sergeant Garner, nor did she identify any new witnesses.

62. Corporal Worley did not request any new documents from third parties.

63. Corporal Worley did not request any further analysis from crime labs or forensic experts.

64. Corporal Worley never went to the crime scene at Mr. James's apartment.

65. Corporal Worley did not track down or speak with any of the people at MGM who witnessed Mr. James win money on October 10, 2020.

66. Corporal Worley did not identify or speak with any of the people shown on MGM surveillance video to whom Mr. James gave cash while at the casino.

67. Corporal Worley did not investigate or attempt to identify any of the five individuals who sent text messages to Mr. James in the hours after he left the casino asking him for money.

68. Corporal Worley did not pursue any investigation into the person with whom Mr. James may have argued at MGM.

69. Corporal Worley did not independently verify any of the financial information compiled in Sergeant Garner's PowerPoint presentation before including it in charging documents that she signed under penalty of perjury.

70. Master Sergeant Miner did not conduct any meaningful new investigation into Mr. James's death after Corporal Worley took over the case and failed to ensure that Corporal Worley conducted any meaningful new investigation.

71. On or around February 4, 2022, Corporal Worley met with the State's Attorney's Office to review the case.

72. Despite conducting no meaningful new investigation in the five months since taking over as lead from Sergeant Garner, on February 4, 2022, Corporal Worley submitted an Application for Statement of Charges against Mr. Cofield.

73. The Application for Statement of Charges is a critical charging document that contains facts supporting probable cause for an arrest and initiates the criminal process.

74. Corporal Worley signed the Application for Statement of Charges under penalty of perjury, swearing that the facts contained therein were true.

75. Police officers have an obligation to be truthful in an Application for Statement of Charges and to disclose all material information, including information that undermines probable cause, so that a neutral judge can make an independent probable cause determination.

76. Corporal Worley's Application for Statement of Charges contained at least three material false statements.

77. Master Sergeant Miner failed to properly review Corporal Worley's Application for Statement of Charges to ensure that it contained truthful information.

#### **IV. Corporal Worley Places False Statements in the Application for Statement of Charges and Omits Material Evidence**

##### **A. False Statement 1: That Mr. Cofield Did Not Communicate with Mr. James After October 10, 2020**

78. In her Application for Statement of Charges, Corporal Worley wrote: "Between the timeframe of October 10 to October 27, 2020, there was no communication or attempts to

communicate between [Mr. Cofield and Mr. James], which was the longest time in 4 months they went without communicating.”

79. This statement was false.

80. In fact, Mr. Cofield called Mr. James twice after October 10, 2020—once on October 22, 2020, and once on October 25, 2020.

81. This call information was included in phone records obtained by the Sheriff’s Office and in Sergeant Garner’s PowerPoint presentation, which Corporal Worley reviewed before submitting the Application for Statement of Charges.

82. Despite having reviewed this PowerPoint, which clearly showed two phone calls from Mr. Cofield to Mr. James during the relevant time period, Corporal Worley chose to write the opposite in her charging documents.

83. Corporal Worley either deliberately omitted the correct information or recklessly disregarded the truth when she included this false statement in her charging documents.

84. At trial, Mr. Cofield’s trial counsel elicited the following admission from Corporal Worley on cross-examination regarding communication between Mr. Cofield and Mr. James:

COUNSEL: So you wrote, quote, between the time frame of October 10th to October 27th, 2020, there was no communication or attempts to communicate between the two.

CORPORAL WORLEY: Yes.

COUNSEL: You wrote that in the statement in support of the charges; correct?

CORPORAL WORLEY: Correct.

COUNSEL And that was false.

CORPORAL WORLEY: Yes.

85. Corporal Worley did not conduct any independent analysis of phone records—she simply relied on Sergeant Garner’s PowerPoint, which correctly identified the two phone calls.

86. This false statement was material because it suggested that Mr. Cofield had suspiciously cut off contact with Mr. James immediately after the casino visit, which would be consistent with having robbed and murdered him.

87. The truth—that Mr. Cofield called Mr. James twice in the days after October 10, 2020, showing an ongoing relationship—undermined the State’s theory that Mr. Cofield knew Mr. James was dead.

**B. False Statement 2: That Mr. Cofield Did Not Contact Detectives After Being Notified of Mr. James’s Death**

88. In her Application for Statement of Charges, Corporal Worley wrote: “Cofield has not contacted detectives in reference to this investigation following being notified of James’s death.”

89. This statement was false.

90. In fact, Mr. Cofield called the Sheriff’s Office twice after being notified of Mr. James’s death on October 27, 2020, and the Sheriff’s Office never returned his calls.

91. At trial, Mr. Cofield’s trial counsel elicited the following admission from Corporal Worley on cross-examination regarding communications between Mr. Cofield and the Sheriff’s Office:

COUNSEL: You wrote in your statement: Cofield has not contacted detectives in reference to this investigation following being notified of James's death. In fact, the officers contacted Mr. Cofield twice on October 27th about Mr. James's death; correct?

CORPORAL WORLEY: Correct.

COUNSEL: And if you look at the cell phone records, Mr. Cofield actually called back to the Charles County Sheriff's Office twice that day, correct?

CORPORAL WORLEY: Correct.

[ . . . ]

COUNSEL Okay. So in the statement of charges where you wrote that Mr. -- Mr. Cofield did not reach back out to the Charles County Sheriff's Office, that was also false.

CORPORAL WORLEY: Yes.

92. This false statement was material because it suggested that Mr. Cofield was avoiding contact with law enforcement and showed consciousness of guilt.

93. The truth—that Mr. Cofield twice attempted to call the Sheriff's Office but his calls went unanswered—showed the opposite: he was attempting to cooperate and provide information.

94. Mr. Cofield's calls to the Sherriff's Office were documented in the phone records to which Corporal Worley had access.

95. Corporal Worley either deliberately omitted the correct information or recklessly disregarded the truth when she included this false statement in her charging documents.

**C. False Statement 3: That Mr. Cofield Spent Approximately \$6,118 Between October 11 and October 20, 2020**

96. In her Application for Statement of Charges, Corporal Worley wrote: "While at the casino, James won several thousand dollars (\$7,900) . . . Cofield's finances revealed from October 11 - October 20, 2020, Cofield spent approximately \$6,118, which is the most amount of money he has had since the end of September."

97. The clear implication of this statement was that Mr. Cofield had spent nearly all of Mr. James's casino winnings in the days immediately after October 10, 2020, and that he had stolen that money by murdering Mr. James.

98. This statement was false.

99. Corporal Worley obtained the figure of “\$6,118” directly from Sergeant Garner’s PowerPoint presentation.

100. Corporal Worley never reviewed the underlying financial records herself to confirm the calculation.

101. Corporal Worley admitted at trial that she never independently verified whether this figure was accurate, even though she signed under penalty of perjury that it was accurate.

102. The \$6,118 figure was the result of an inaccurate calculation that mixed up deposits and withdrawals and failed to account for Mr. Cofield’s legitimate sources of income.

103. This false statement was material because it provided an apparent financial motive for Mr. Cofield to have robbed and murdered Mr. James, when in fact Mr. Cofield’s finances showed no such motive.

104. Corporal Worley either deliberately omitted the correct information or recklessly disregarded the truth when she included this false statement in her charging documents.

#### **D. Material Omissions**

105. Corporal Worley omitted multiple material facts from the Application for Statement of Charges that would have undermined a neutral magistrate’s finding of probable cause.

106. Corporal Worley omitted the fact that no gun was recovered in the investigation that linked Mr. Cofield to the crime.

107. Corporal Worley also omitted the fact that no physical evidence recovered in the investigation connected Mr. Cofield to the crime scene.

108. Corporal Worley also omitted the fact that DNA results from Mr. James’s apartment showed Mr. James’s profile and were inconclusive as to any other profile.

109. Corporal Worley also omitted mention of any potential alternative suspects, even though the Sheriff's Office was aware (1) that Mr. James had gotten into an argument with another individual at MGM on October 10, 2020; (2) that another witness had voiced a concern that Mr. James had been followed home; (3) that in the hours immediately after Mr. James left MGM on October 10, 2020, he received at least five text messages from different numbers asking him for money; and (4) that surveillance video from MGM showed Mr. James giving cash to other individuals while at the casino on October 10, 2020.

110. Corporal Worley detailed how Mr. Cofield left Mr. James's apartment and traveled to Illinois. However, Corporal Worley omitted that on October 28, 2020, a witness told the Sheriff's Office that such travel was not unusual for Mr. Cofield, as his family was a "nomad" family known to travel around the country.

111. Corporal Worley omitted any mention of Mr. James's neighbors hearing a gunshot or shots during times when law enforcement knew Mr. Cofield was not at Mr. James's apartment.

112. Corporal Worley also omitted any mention of the discrepancies regarding Mr. James's apartment door being locked on October 19, 2020, and unlocked on October 27, 2020, when the Sheriff's Office arrived.

#### **V. Mr. Cofield's Incarceration, Trial, and Acquittal**

113. Corporal Worley's Application for Statement of Charges, which contained at least three false statements and numerous material omissions, were submitted to a neutral magistrate.

114. The neutral magistrate relied on Corporal Worley's Application for Statement of Charges, including the three false statements included therein, to issue an arrest warrant and initial criminal charges against Mr. Cofield on February 4, 2022.

115. Absent the three false statements in Corporal Worley's Application for Statement of Charges, Mr. Cofield would not have been criminally charged.

116. The false statements in Corporal Worley's Application for Statement of Charges caused a wrongful initiation of criminal proceedings against Mr. Cofield.

117. On February 12, 2022, Mr. Cofield was arrested in Wichita Falls, Texas, by the U.S. Marshals Service.

118. At the time of his arrest, Mr. Cofield was traveling with his wife and their two minor children.

119. Law enforcement executed search warrants on both the residence where Mr. Cofield was staying and on his vehicle.

120. Mr. Cofield's wife and two young children witnessed the searches.

121. Mr. Cofield was detained in Texas. Shortly thereafter, he was extradited to Maryland and held in the Charles County Detention Center.

122. On March 25, 2022, Mr. Cofield was indicted by a grand jury on thirteen counts relating to Mr. James's death, including first-degree murder.

123. Mr. Cofield was held in the Charles County Detention Center from February 2022 until September 2022.

124. In the Charles County Detention Center, Mr. Cofield experienced serious health issues, including dangerously high blood pressure. Mr. Cofield received inadequate medical care at the Charles County Detention Center.

125. In September 2022, Mr. Cofield was granted house arrest, where he remained for the next two and a half years until his trial.

126. On November 30, 2022, Mr. Cofield, through his attorney, filed a motion to suppress his arrest, arguing that the arrest was unlawful due to false statements in the Application for Statement of Charges.

127. A hearing was held on November 30, 2022, to address Mr. Cofield's motion.

128. During this hearing, Mr. Cofield's attorney challenged the accuracy of the statements in Corporal Worley's charging documents.

129. According to an Assistant State's Attorney interviewed during a subsequent internal affairs investigation, the State's Attorney "did not recall Corporal Worley notifying the State's Attorney's Office about the error" prior to the motion hearing.

130. Corporal Worley's failure to proactively disclose her errors to the State's Attorney's Office until confronted with them during a suppression hearing demonstrates her consciousness that the errors were significant and damaging to the State's case.

131. Mr. Cofield's trial began on February 24, 2025, before a jury in Charles County Circuit Court.

132. During the trial, the State put Corporal Worley on as a key witness regarding the investigation.

133. On cross-examination, Mr. Cofield's defense attorney systematically exposed each of the three false statements in Corporal Worley's Application for Statement of Charges.

134. Corporal Worley admitted under oath that she had written false information in the charging documents regarding the lack of communication between Mr. Cofield and Mr. James.

135. Corporal Worley admitted under oath that she had not checked the Sheriff's Office's non-emergency phone lines to determine whether Mr. Cofield had called after being notified of Mr. James's death.

136. Corporal Worley admitted under oath that she had not verified the \$6,118 spending figure before including it in charging documents signed under penalty of perjury.

137. The trial also revealed the extent of Corporal Worley's failure to conduct a thorough investigation, including her failure to pursue alternative suspects, obtain critical CCTV footage, verify financial information, or visit the crime scene.

138. On March 5, 2025, after deliberations, the jury returned a verdict of not guilty on all counts.

**VI. Mr. Cofield Files an Internal Affairs Complaint with the Sheriff's Office, and the Complaint is Sustained**

139. Following Mr. Cofield's acquittal, he contacted the Charles County Sheriff's Office on or around April 10, 2025, to make a complaint about his wrongful arrest and charges.

140. Mr. Cofield's complaint prompted the Sheriff's Office to begin an internal affairs investigation into Corporal Worley's conduct.

141. The internal affairs investigator determined that Corporal Worley "did make a mistake" when she placed at least one inaccurate statement in the Application for Statement of Charges.

142. The internal affairs investigation sustained a charge against Corporal Worley for Violation of Chapter 1, Section 113 of the Charles County Sheriff's Office Administrative and Operational Manual – Attention to Duty ("AOM 1-113").

143. AOM 1-113 provides that:

All employees are expected to maintain a strong personal commitment to the proper performance of their duties. Sworn employees are considered subject to duty at all times and in all places within the geographical area of their authority. Sworn employees may be considered "off-duty" at times when they are not assigned specific work hours, but are responsible to assume a duty which presents itself and is within the scope of the essential functions of their positions.

144. However, the internal affairs investigation did not sustain charges against Corporal Worley for violations of the Administrative and Operational Manual related to truthfulness (AOM 1-123), performance of duty (AOM 1-136), or violation of federal, state, and local laws/ordinances (AOM 1-139).

145. Despite a sustained finding against Corporal Worley, the Sheriff's Office imposed only minimal discipline.

146. The discipline consisted of a Letter of Reprimand placed in Corporal Worley's personnel file on or around September 12, 2025.

147. The "[b]rief description of the violation" in the Letter of Reprimand states as follows:

Corporal Worley was assigned a homicide investigation that was previously assigned to a former detective. She submitted an application of charges to the District Court Commissioner that resulted in an arrest warrant being issued for the defendant for Murder. It was later discovered that Cpl. Worley made a mistake and placed an inaccurate statement in the application for charges. This statement consisted of phone calls between the victim and defendant.

148. The Letter of Reprimand makes no mention of the additional false statements Detective Worley placed in the application of charges, including Mr. Cofield's attempts to contact the Sheriff's Office and Mr. Cofield's spending.

149. Corporal Worley was not terminated, demoted, suspended, or otherwise meaningfully sanctioned for her misconduct.

150. Corporal Worley remains employed as a detective with the Charles County Sheriff's Office following the internal affairs investigation and, on information and belief, she remains assigned to homicide investigations.

## **VII. Mr. Cofield's Damages**

151. Mr. Cofield lost over three years of his life defending himself against Defendants' unlawful arrest and murder charge.

152. During and after his wrongful incarceration and home detention, Mr. Cofield suffered immense physical and emotional pain.

153. While at the Charles County Detention Center, Mr. Cofield was afraid for his own safety and was placed in protective custody. In protective custody, he was in solitary confinement for 23 hours of each day. The profound psychological harm of solitary confinement is well-documented.

154. Mr. Cofield's release from the Charles County Detention Center into home detention did not grant him freedom of any kind. Because the family could not purchase a house or get a lease with the threat of Mr. Cofield's trial and conviction looming over them, Mr. Cofield was confined to a one-room hotel room with his wife and their two minor children for around five months until his wife could secure a lease to a small apartment.

155. Mr. Cofield began experiencing dangerously high blood pressure at the Charles County Detention Center due to the stress of incarceration. He did not receive adequate medical care, which included the facility providing incorrect medication at inconsistent times. Mr. Cofield also suffered from gum disease and other severe dental issues while incarcerated, and was unable to get the care he needed—including multiple tooth extractions—until his wife made daily calls to the Charles County Detention Center. To this day, Mr. Cofield suffers from high blood pressure.

156. Mr. Cofield's incarceration and home detention robbed him of the chance to support his family, both financially and emotionally. His minor daughter has severe medical issues and disabilities, and Mr. Cofield was unable to assist with her care during his

incarceration. Mr. Cofield's oldest son, who is enlisted in the U.S. Army Airborne forces, had to send money home to help support Mr. Cofield's wife and two minor children. Due to his incarceration, Mr. Cofield also missed his oldest son's graduation from basic training—a major life milestone.

157. Mr. Cofield missed out on several years of basic human liberties: the ability to share holidays, birthdays, weddings, and funerals with those he cherishes; the opportunity to find meaningful work; the chance to care for and raise his children; to be present with friends and family; and the fundamental freedom to lead a life of his own choosing.

158. Mr. Cofield experienced and continues to experience severe emotional trauma as a result of Defendants' misconduct. The burden of a looming trial and possible conviction caused him to experience fear and anxiety; even after acquittal, he does not leave his home much due to anxiety.

159. Mr. Cofield's injuries and damages were foreseeable to Defendants at the time of their acts and omissions.

160. All of the acts and omissions committed by Defendants were done intentionally, unlawfully, maliciously, wantonly, recklessly, negligently, and/or with bad faith, and said acts meet all of the standards for imposition of punitive damages.

### **FEDERAL CLAIMS**

#### **COUNT I – 42 U.S.C. § 1983**

#### **Violation of Due Process – Fabrication of Evidence (Against Defendant Worley)**

161. Each foregoing paragraph is incorporated as if restated fully herein.

162. Corporal Worley fabricated evidence against Mr. Cofield by including at least three materially false statements in the Application for Statement of Charges used to charge Mr. Cofield with Mr. James's murder: (1) that Mr. Cofield did not communicate with Mr. James after

October 10, 2020; (2) that Mr. Cofield did not contact detectives after being notified of Mr. James's death; and (3) that Mr. Cofield spent approximately \$6,118 between October 11 and October 20, 2020.

163. Corporal Worley's fabrication of evidence led to the wrongful initiation of prosecution against Mr. Cofield.

164. Corporal Worley did so under color of state law, deliberately, recklessly, and with deliberate indifference for Mr. Cofield's clearly established constitutional rights and innocence. No reasonable officer in 2022 would have believed this conduct was lawful.

165. As a direct and proximate result of Corporal Worley's fabrication of evidence, Mr. Cofield suffered injuries, including but not limited to loss of liberty, physical injury, and emotional distress.

166. The misconduct described in this Count was objectively unreasonable and was undertaken intentionally, with malice and willful indifference to Mr. Cofield's clearly established constitutional rights.

**COUNT II – 42 U.S.C. § 1983**  
**Violation of Due Process - Malicious Prosecution**  
**(Against All Defendants)**

167. Each foregoing paragraph is incorporated as if restated fully herein.

168. Through placing false statements in and omitting material information from the Application for Statement of Charges, Defendants caused Mr. Cofield to be arrested, charged, and prosecuted for the murder of Mr. James pursuant to legal process that was unsupported by probable cause, thereby violating Mr. Cofield's clearly established rights, under the Fourth and Fourteenth Amendments of the United States Constitution, to be free of unreasonable searches and seizures.

169. Corporal Worley placed at least three false statements in the Application for Statement of Charges, as identified above. Corporal Worley also omitted material information from the Application, including the lack of physical evidence, the presence of alternative suspects, and the locked door discrepancy, all of which undercut a finding of probable cause.

170. Master Sergeant Miner failed to review and correct Corporal Worley's Application for Statement of Charges.

171. No reasonable officer in 2022 would have believed Defendants' conduct was lawful.

172. The misconduct described in this Count was objectively unreasonable, and Defendants, with malice, acting individually and in concert, intentionally, knowingly, recklessly, and deliberately misrepresented the truth and withheld exculpatory facts from the prosecutor.

173. Criminal proceedings terminated in Mr. Cofield's favor.

174. As a direct and proximate result of Defendants' malicious prosecution, Mr. Cofield suffered injuries, including but not limited to loss of liberty, physical injury, and emotional distress. Defendants had a reasonable opportunity to prevent this harm, but failed to do so.

**COUNT III – 42 U.S.C. § 1983**  
**Violation of Due Process – Failure to Intervene**  
**(Against Defendant Miner)**

175. Each foregoing paragraph is incorporated as if restated fully herein.

176. By their conduct and under color of law, during the constitutional violations described herein and others yet unknown, Master Sergeant Miner stood by without intervening to prevent the violation of Mr. Cofield's constitutional rights, even though he had the opportunity to do so.

177. As a direct and proximate result of Master Sergeant Miner's failure to intervene to prevent the violation of Mr. Cofield's clearly established constitutional rights, Mr. Cofield suffered injuries, including but not limited to loss of liberty, physical injury, and emotional distress. Master Sergeant Miner had a reasonable opportunity to prevent this harm, but failed to do so.

178. The misconduct described in this Count was objectively unreasonable and was undertaken intentionally, with malice and willful indifference to Mr. Cofield's clearly established constitutional rights.

**STATE LAW CLAIMS**

**COUNT IV – State Law Claim  
Malicious Prosecution  
(Against All Defendants)**

179. Each paragraph of this Complaint is incorporated as if fully stated herein.

180. Defendants caused Mr. Cofield to be subjected improperly to judicial proceedings for which there was no probable cause, resulting in Mr. Cofield's injuries.

181. Defendants knowingly or recklessly made false statements, fabricated evidence, and withheld exculpatory evidence regarding Mr. Cofield's alleged culpability.

182. Criminal proceedings terminated in Mr. Cofield's favor.

183. The misconduct described in this Complaint was undertaken with malicious intent and willful indifference to Mr. Cofield's clearly established constitutional rights.

184. As a direct and proximate result of this misconduct, Mr. Cofield suffered injuries, including, but not limited to, loss of liberty, physical injury, and severe emotional distress.

**COUNT V – State Law Claim  
Intentional Infliction of Emotional Distress  
(Against All Defendants)**

185. Each of the foregoing paragraphs is incorporated as if restated fully herein.

186. The acts and conduct of Defendants were extreme and outrageous. Defendants' actions were rooted in an abuse of power or authority, and they were undertaken with intent to cause, or were in reckless disregard of the probability that their conduct would cause, severe emotional distress to Mr. Cofield, as is more fully alleged above.

187. As a direct and proximate result of Defendants' actions, Mr. Cofield suffered and continues to suffer physical injury and severe emotional distress.

**COUNT VI – State Law Claim**  
**Article 24 of the Maryland Constitution – Declaration of Rights**  
**(Against All Defendants)**

188. Each of the foregoing paragraphs is incorporated as if restated fully herein.

189. As described more fully above, Defendants violated Mr. Cofield's due process rights by fabricating evidence in the Application for Statement of Charges. Due to Defendants' due process violations, Mr. Cofield was wrongfully imprisoned for a crime that he did not commit and which Defendants knew or should have known he did not commit.

190. As a direct and proximate result of the Defendants' actions, Mr. Cofield suffered damages including, but not limited to, loss of liberty, physical injury, and severe emotional distress.

**DEMAND FOR DAMAGES**

WHEREFORE, Plaintiff Artie Cofield requests that this Court enter judgment in his favor and against Defendants, and award him:

1. compensatory damages, attorneys' fees, and costs, jointly and severally against each Defendant;
2. punitive damages against each Defendant; and
3. any and all other relief as this Court deems appropriate.

**JURY DEMAND**

Plaintiff Artie Cofield hereby demands a trial by jury pursuant to Fed. R. Civ. P. 38(b) on all triable issues.

Dated: May 14, 2026

Respectfully submitted,

/s/ Neel K. Lalchandani  
Neel K. Lalchandani (Bar No. 20291)  
Jacqueline L. Cadman (Bar No. 31330)  
Alisha Jarwala (Bar No. 32087)  
BROWN GOLDSTEIN & LEVY, LLP  
120 E. Baltimore Street, Suite 2500  
Baltimore, Maryland 21202  
T: (410) 962-1030  
F: (410) 385-0869  
nlalchandani@browngold.com  
jcadman@browngold.com  
ajarwala@browngold.com