Circuit Court for Baltimore City
Case No. 123144019

UNREPORTED*

IN THE APPELLATE COURT

OF MARYLAND

No. 0429

September Term, 2024

DELONTE TOLLIVER

v.

STATE OF MARYLAND

Albright,
Kehoe, S.,
Harrell, Glenn T.
(Senior Judge, Specially Assigned)

JJ.

Opinion by Albright, J.

Filed: July 8, 2025

*This is an unreported opinion. This opinion may not be cited as precedent within the rule of stare decisis. It may be cited for its persuasive value only if the citation conforms to Rule 1-104(a)(2)(B).

In the Circuit Court for Baltimore City, appellant Delonte Tolliver entered a conditional guilty plea to drug possession and firearm offenses after a stop and search by Baltimore City police officers yielded packages of cannabis, suspected cocaine, and a handgun on Mr. Tolliver's person. He was sentenced to two concurrent eight-year terms of imprisonment. In this appeal, Mr. Tolliver presents a single question:

> Did the circuit court err by denying Mr. Tolliver's suppression motion?

We answer in the negative and affirm.

BACKGROUND

A. Mr. Tolliver's Charges and His Motion to Suppress

As a result of the contraband recovered on his person, Mr. Tolliver was charged with various drug possession and firearm offenses.[1] In a pretrial suppression motion, Mr. Tolliver claimed that the search that turned up the contraband was illegal. Specifically, he contended that he had been "arrested immediately upon his first encounter with police" without probable cause. As a result, he concluded, his Fourth Amendment rights had been violated and the evidence against him should be excluded.

[1] In total, Mr. Tolliver was charged with: (1) possession of a firearm in relation to a drug trafficking crime; (2) possession of cocaine with intent to distribute; (3) possession of a firearm after a disqualifying conviction; (4) possession of a firearm by a felon; (5) possession of a firearm after a disqualifying crime; (6) wearing, carrying, and transporting a handgun on the person; and (7) possession of ammunition as a prohibited person.

B. The Suppression Hearing

Officer Kristopher Bielecki was the sole witness at the March 1, 2024 suppression hearing. Officer Bielecki served as a member of the Westside Initiative, "a very proactive unit in the Baltimore City police" that investigates controlled dangerous substance transactions and handgun violations. Officer Bielecki had been a member of the police force for roughly a year when he arrested Mr. Tolliver. Video footage from Officer Bielecki's body-camera and from a nearby surveillance camera were also admitted during the hearing.

On May 1, 2023, Officer Bielecki was in the 1800 block of North Smallwood Avenue. He was "very familiar with the area[,]" which Officer Bielecki also characterized as "an open drug market" due to the high frequency of drug trafficking that occurred there. He explained that he himself had conducted two arrests in that area as the primary officer, and had assisted in approximately thirty arrests there in total.

Officer Bielecki also described a liquor store located on the corner of the 1800 block of North Smallwood Avenue. The interior of the store "forms an L shape" with entrances on both Smallwood Avenue and North Avenue. Officer Bielecki was "very intimate" with the layout of the store.[2]

Around 2:00 p.m. that day, Officer Bielecki was assisting Detective Butt, Detective Bohli, and Detective Jackson to investigate an armed person and controlled

[2] Officer Bielecki explained that his familiarity of the liquor store and the surrounding area also came from his eleven years as a firefighter where he served the same area prior to joining the police force.

dangerous substances at that liquor store. Officer Bielecki, however, was unaware how the investigation began. The only information he was provided was a description of the suspect as "a number one male,[3] wearing all black, involved with [controlled dangerous substances], an armed person."

When he arrived at the liquor store, Officer Bielecki exited the passenger side of a marked police cruiser and immediately went to the Smallwood Avenue entrance. His fellow officers had already exited a separate vehicle at the front of the store and moved to the North Avenue entrance. While Officer Bielecki approached the Smallwood Avenue entrance, Mr. Tolliver "rapidly" came out the building and they ran into each other. Mr. Tolliver matched the description of the suspect. Officer Bielecki "noticed [Mr. Tolliver] was trying to get away quickly" and apprehended him by "guiding him towards the ground as he was trying to flee."[4] In total, Officer Bielecki estimated he was on scene for two seconds before he came into contact with Mr. Tolliver.

When Officer Bielecki apprehended Mr. Tolliver, a black plastic bag Mr. Tolliver was holding expelled ninety-nine grams of cannabis onto the pavement. Officer Bielecki could not recall if the bag had ripped or if the contents had merely fallen out. The bag itself was opaque, and Officer Bielecki described it as similar to what the liquor store

[3] Although a "number one male" was not defined during the suppression hearing, both parties agree that this term refers to a Black male.

[4] Officer Bielecki explained his phrasing of "guid[ing Mr. Tolliver] to the ground" meant he did not use his body weight to take Mr. Tolliver down.

might provide to its customers. During a subsequent search of Mr. Tolliver's person, the police recovered cocaine and a handgun as well.

Officer Bielecki later learned that at the same time he arrested Mr. Tolliver, another individual matching the description of the suspect was arrested inside the liquor store. Officer Bielecki did not recall being informed about the other individual's arrest, though, until after he had apprehended Mr. Tolliver.

C. The Circuit Court's Ruling

The circuit court denied Mr. Tolliver's motion to suppress. The circuit court explained its process in making this ruling:

> I analyzed this case as a progression from a *Terry*[5] stop, which brings into play reasonable, articulable suspicion, to the making of an arrest on probable cause, which then obviously gives the officers authority to conduct a search incident to that arrest.

The circuit court first concluded that Officer Bielecki had reasonable suspicion for the initial stop of Mr. Tolliver:

> [I]n approaching this interaction, Officer Bielecki was aware that the police in his unit had -- officers or detectives in his unit had developed a basis to have reasonable articulable suspicion to stop someone, who he knew only as a black male, who is dressed in all black clothing and was outside or immediately inside the liquor store at the corner of North Avenue and North Smallwood, which he was very familiar with from his time as a fire fighter.

[5] A "*Terry* stop," "investigatory stop," or "stop and frisk," is a classification of a detention that is less intrusive than an arrest. *Trott v. State*, 473 Md. 245, 255–56 (2021). This form of detention derives from the United States Supreme Court decision in *Terry v. Ohio*, 392 U.S. 1 (1968), where the Supreme Court determined that mere reasonable suspicion, as opposed to the more stringent probable cause standard, was required in cases where a stop and search is predicated on an officer's belief that their safety or the safety of others is in jeopardy.

> He was positioned or arrived and positioned himself at the Smallwood Street or Avenue exit to that store, and I find that when Mr. Tolliver exited, a black male in all black clothing quickly and tried to flee out that door, that it was reasonable for Mr. -- for Officer Bielecki to believe that that was the suspect about which the police had developed reasonable articulable suspicion of both [controlled dangerous substance] activity and being armed.

Then, the circuit court found that there was probable cause to believe Mr. Tolliver was involved in drug distribution after the cannabis spilled from Mr. Tolliver's bag for the officers to see.[6] The circuit court did not "find any grabbing and tearing of the bag in order to empty its contents." Instead, "[i]t was simply incidental to what was a lawful police activity." Thus, the circuit court concluded that Officer Bielecki and the other officers were justified in searching Mr. Tolliver incident to his arrest.

After the circuit court denied Mr. Tolliver's motion to suppress, he entered a conditional plea[7] and was sentenced on April 15, 2024. He pleaded guilty to one count of

[6] Maryland voters approved a constitutional amendment permitting the use and possession of cannabis by individuals above the age of twenty-one as of July 1, 2023. *Cutchember v. State*, No. 1474, Sept. Term, 2023, 2025 WL 1553991, at *3 (Md. App. June 2, 2025). The General Assembly passed a new legislative scheme for regulating cannabis possession and use in 2022, delimiting a "personal use amount" that is legal for individuals older than twenty-one and a "civil use amount" that would result in a civil offense and a fine. *Id.* Any amount greater than the "civil use amount" is a crime punishable by imprisonment and/or a fine. *Id.* There is no dispute in this case that the amount of cannabis Mr. Tolliver possessed surpassed the civil use amount, and that the officers had both reasonable suspicion and probable cause to stop and search Mr. Tolliver once the ninety-nine grams of cannabis he possessed were visible to the officers.

[7] Maryland Rule 4-242(d)(2) allows defendants to enter a conditional guilty plea to "reserve the right to appeal one or more issues specified in the plea that (A) were raised by and determined adversely to the defendant, and, (B) if determined in the defendant's favor would have been dispositive of the case." Mr. Tolliver's plea was conditioned on retaining his right to note this appeal.

possession of cocaine with intent to distribute, and one count of illegal possession of a firearm as a disqualified individual. The circuit court sentenced Mr. Tolliver to concurrent eight-year sentences for each count, and Mr. Tolliver noted this appeal the same day.

STANDARD OF REVIEW

Our review of a circuit court's denial of a motion to suppress is confined to the record of the suppression hearing. *Washington v. State*, 482 Md. 395, 420 (2022). We accept the fact-finding of the circuit court unless clearly erroneous and view the facts in the light most favorable to the prevailing party at the suppression hearing. *Washington*, 482 Md. at 420. Our review of the legal import of the facts, however, is de novo. *Id.* On appeal, we perform an "independent constitutional evaluation by reviewing the relevant law and applying it to the unique facts and circumstances of the case." *Id.*

DISCUSSION

A. The Parties' Contentions

Mr. Tolliver argues that Officer Bielecki did not have reasonable suspicion of criminal activity when he seized Mr. Tolliver. First, he identifies the seizure as when Officer Bielecki grabbed him and took him to the ground. Then, Mr. Tolliver asserts that both flight and the high-crime nature of the area where he was seized cannot justify Officer Bielecki's seizure. As for flight, Mr. Tolliver argues that "the record supports that Mr. Tolliver was already leaving the store at the time that he encountered Officer Bielecki and was immediately seized before he ever had an opportunity to flee." Regarding the high-crime nature of the area, Mr. Tolliver argues that Officer Bielecki did

not observe Mr. Tolliver demonstrating any behavior consistent with the crimes that Officer Bielecki associated with the area. Without the considerations of flight and the high-crime nature of the location where the seizure occurred, Mr. Tolliver contends that Officer Bielecki only knew that there was a suspect that was: (1) a Black man in all black clothing; (2) "displaying characteristics of an armed individual and carrying [controlled dangerous substances,]"; and (3) located at or near the 1800 block of North Smallwood Avenue in West Baltimore. Such limited information, Mr. Tolliver concludes, was insufficient to establish reasonable suspicion.

The State acknowledges that Mr. Tolliver was seized when Officer Bielecki grabbed ahold of him but contends that Officer Bielecki had reasonable suspicion to support that seizure. Although the State admits that the description of the suspect Officer Bielecki received did not justify a *Terry* stop of Mr. Tolliver, the State argues that the description should be considered in conjunction with Mr. Tolliver's unprovoked flight in a high-crime area. In sum, because Officer Bielecki was confronted by an individual fleeing a liquor store in a high-crime area immediately after police officers arrived, and the individual matched the description of a suspect Officer Bielecki was specifically going to investigate at that location, the State concludes that the seizure was supported by reasonable suspicion. We agree with the State.

B. Searches and Seizures Under the Fourth Amendment

The Fourth Amendment to the United States Constitution protects against "unreasonable searches and seizures" by the government. U.S. Const. amend. IV. Thus,

the "touchstone" of Fourth Amendment analysis "is always the reasonableness in all the circumstances of the particular governmental invasion of a citizen's personal security." *Washington*, 482 Md. at 420 (quoting *Trott*, 473 Md. at 254). Reasonableness is determined only after weighing both "the public interest" as well as an "individual's right to personal security free from arbitrary interference by law officers." *Trott*, 473 Md. at 255 (quoting *Pacheco v. State*, 365 Md. 311, 321 (2019)).

The reasonableness determination also depends, in large part, on the degree of intrusiveness from the police-citizen contact. *Trott*, 473 Md. at 255*; see also Swift v. State*, 393 Md. 139, 149–51 (2006). Reasonableness requires "probable cause" for arrests, the most intrusive form of interaction. *Trott*, 473 Md. at 255. A *Terry* stop, on the other hand, "must be supported by reasonable suspicion that a person has committed or is about to commit a crime and permits an officer to stop and briefly detain an individual." *Id.* at 256 (quoting *Swift*, 393 Md. at 150). A "consensual encounter" is the least intrusive form of interaction, and it "need not be supported by any suspicion" because it does not restrain an individual's liberty. *Swift*, 393 Md. at 151. A police-citizen contact, however, can be a "fluid situation" that does not fit neatly into a single category. *Bailey v. State*, 412 Md. 349, 365 (2010) (quoting *Swift*, 393 Md. at 152).

Reasonable suspicion for a *Terry* stop like the one at issue in this case "requires a lower standard than probable cause." *See Washington*, 482 Md. at 422. In other words, evidence establishing reasonable suspicion may not support probable cause. *See, e.g.*, *In re D.D.*, 479 Md. 206, 231 (2022) ("[A] particular circumstance or set of circumstances

may satisfy the reasonable suspicion standard but fall short of probable cause.").[8] That said, reasonable suspicion still requires "a particularized, objective basis for how the observed conduct, in the context known to the officer, was indicative of criminal activity." *Washington*, 482 Md. at 422 (cleaned up). A hunch or unparticularized suspicion is insufficient to amount to reasonable suspicion, but an amalgamation of seemingly innocent factors may suffice. *Id.*

Reasonable suspicion hinges on the "totality of the circumstances" presented to the officer. *Washington*, 482 Md. at 422. When considering the totality of the circumstances, individual innocent factors may add up to probable cause or reasonable suspicion if they are "more indicative of criminal activity than any one factor assessed individually." *See Crosby v. State*, 408 Md. 490, 511 (2009). But we take care not to engage in a "divide and conquer" method of analysis when addressing multiple factors. *Id.* at 510 (quoting *United States v. Arvizu*, 534 U.S. 266, 274 (2002)).

C. Analysis

Because both parties agree that Mr. Tolliver was seized for Fourth Amendment purposes when Officer Bielecki grabbed him and took him to the ground, our analysis in this case focuses on whether Officer Bielecki had reasonable suspicion to justify that

[8] The Court in *In re D.D.* held that the odor of cannabis may establish reasonable suspicion, but not probable cause. 479 Md. at 233. However, after the decision in *In re D.D.*, the Maryland General Assembly enacted a new section of the Criminal Procedure Article, § 1-211, effective July 1, 2023, providing that a law enforcement officer may not initiate a stop based solely on the odor of burnt or unburnt cannabis. *See Cutchember*, 2025 WL 1553991 at *1–2.

seizure. We divide our discussion on this issue as follows: (1) the proper set of facts contributing to Officer Bielecki's suspicion at the time of the seizure; and (2) whether the seizure was supported by reasonable suspicion when considering those facts in their totality.

(1) What Facts Contributed to Officer Bielecki's Suspicion?

Mr. Tolliver and the State do not contest many of the facts contributing to Officer Bielecki's suspicion. They agree that Officer Bielecki was informed that a Black man, wearing all black clothing, and displaying characteristics of an armed individual who was carrying controlled dangerous substances was at or near the liquor store on the 1800 block of North Smallwood Avenue in West Baltimore. There is no dispute that Mr. Tolliver met the physical description of the suspect, too. Further, both parties concur that Mr. Tolliver was holding a black plastic bag, and that Officer Bielecki seized him mere seconds after arriving at the liquor store.

Mr. Tolliver contends, however, that both flight and the high-crime nature of where he was seized should not be considered when properly determining whether reasonable suspicion supported Officer Bielecki's seizure of him. Addressing flight, Mr. Tolliver argues that "the suppression court did not find as a matter of fact—and the record does not support—that Mr. Tolliver knew that law enforcement officers were present before [Mr. Tolliver] exited[,]" and he therefore could not have been fleeing anything. As for the "high-crime" nature of the area, Mr. Tolliver argues that because he was not observed engaging in any behavior consistent with the crimes Officer Bielecki

associated with the area, the location of the seizure should not be considered in the reasonable suspicion analysis. We disagree.

We begin our analysis with deference to the circuit court's findings, unless those determinations are "clearly erroneous." *See Washington*, 482 Md. at 421. In Mr. Tolliver's suppression hearing, the circuit court found that Mr. Tolliver had "tried to flee" out the door where he ran into Officer Bielecki, and that "[Mr. Tolliver] came out trying to go to the side, to his right, to go up to the street to escape." The circuit court also acknowledged that "[f]light alone would not have been sufficient, but all of the other circumstances combined are sufficient to allow [Officer Bielecki] to stop Mr. Tolliver[.]" The circuit court did not make an explicit finding that the seizure occurred in a high-crime area, but recognized that the seizure occurred at the liquor store "at the corner of North Avenue and North Smallwood, which [Officer Bielecki] was very familiar with[.]"

We see no clear error in the circuit court's explicit findings that Mr. Tolliver was fleeing the liquor store when Officer Bielecki apprehended him. Officer Bielecki testified that "Mr. Tolliver came out of the store rapidly," "that [Mr. Tolliver] was trying to get away quickly[,]" that "[Mr. Tolliver] was moving at a very quick pace," and he confirmed that Mr. Tolliver ran out the door as Officer Bielecki was approaching. Video footage of Mr. Tolliver exiting the store showed him running while leaving the store. To be sure, Officer Bielecki was only on the scene for a matter of seconds, but this fact, by itself, does not undermine the finding that Mr. Tolliver was fleeing at the time he was seized by Officer Bielecki. The video footage also showed that Officer Bielecki's fellow

officers had entered the store by the time Officer Bielecki was exiting his own vehicle and approaching the side entrance. Their entrance via the front door, while Officer Bielecki was approaching the side door, reasonably suggests that their shared tactic was to prompt a potential suspect to exit the store via the side door, there to be met by a waiting Officer Bielecki. Thus, without any indication of clear error, we decline to disturb the circuit court's finding that Mr. Tolliver was fleeing.

If a circuit court's fact-finding is ambiguous, incomplete, or nonexistent, we "accept [the] version of the evidence most favorable to the prevailing party." *Morris v. State*, 153 Md. App. 480, 490 (2003). In other words, we "fully credit" and "give maximum weight" to the prevailing party's witnesses and evidence and make any inferences and resolve any ambiguities in favor of the prevailing party. *Id.* To support a location's designation as a "high-crime area," there must be specific facts that "identify a location or geographic area" that is not overly broad, as well as identifying "particular criminal activity occurring in the not-too-distant past[.]" *Washington*, 482 Md. at 443. Additionally, "the conduct giving rise to officers' suspicions must not be inconsistent with the nature of the crimes alleged to establish the high-crime area." *Id.*

The evidence from the suppression hearing, viewed in the light most favorable to the State, establishes that Mr. Tolliver was seized in a high-crime area. Officer Bielecki testified that he was "very familiar with the area" where Mr. Tolliver was seized around the 1800 block of North Smallwood Avenue. He described the area as an "open drug market" that is "known for drug trafficking, high frequency." Further, Officer Bielecki

described that he had been involved "in probably 30 arrests just at that location." And, contrary to Mr. Tolliver's claims, Officer Bielecki observed behavior consistent with drug activity from Mr. Tolliver when he saw him fleeing, bag-in-hand, immediately after the arrival of the police.

Accordingly, the totality of the circumstances here are that Mr. Tolliver matched the physical description of the suspect, that Mr. Tolliver was holding a black plastic bag, that Mr. Tolliver attempted to flee within seconds after the officers entered the liquor store, and that the seizure occurred in a high-crime area. Against this backdrop, we next turn to the determination whether the sum of these circumstances amount to reasonable suspicion.

(2) Did These Facts Amount to Reasonable Suspicion?

Mr. Tolliver seeks to distinguish the circumstances of his seizure from three similar cases where an officer was determined to have reasonable suspicion for a stop: *Washington v. State*, 482 Md. 395 (2023); *Sizer v. State*, 456 Md. 350 (2017); and *Bost v. State*, 406 Md. 341 (2008). We discuss each case in turn before concluding that, as in those cases, the totality of the circumstances here gave rise to the requisite level of reasonable suspicion.

In *Washington*, two police officers were driving in an area associated with drug dealing when they observed the defendant and another person standing together in an alley. 482 Md. at 409. The officers were not familiar with the defendant and did not see him engage in "any apparent drug activity." *Id.* at 410. The officers then saw the

defendant look directly at the marked police vehicle before he "immediately ran away[.]" *Id.* The arresting officer then observed the defendant jump a fence and try to conceal himself in bushes, before he was eventually apprehended. *Id.* at 412.

The Court determined those facts established reasonable suspicion for the officer to stop and frisk the defendant. *Id.* at 454. Although the Court determined that unprovoked flight in a high-crime area does not automatically amount to reasonable suspicion, it can be considered in the totality of the circumstances analysis. *Id.* at 407. In other words, "a court may consider whether unprovoked flight could reasonably be perceived as a factor justifying a conclusion that criminal activity is afoot or a factor consistent with innocence[.]" *Id.* Cautioning that its conclusion was "highly fact-specific[,]" the Court held that the defendant's "unprovoked, headlong flight and his other evasive maneuvers in a high-crime area" supported reasonable suspicion. *Id.* at 453.

The defendant in *Sizer* was seized after police officers observed him fleeing from the group he was standing with once the defendant saw the officers. 456 Md. at 374. The interaction occurred at a park, and the officers had observed a bottle being passed around the group before being thrown to the ground by an unidentified individual within the group. *Id.* Both the improper disposal of a glass container and the consumption or possession of alcoholic beverages in that area were criminal misdemeanors. *Id.* at 372.

The Court determined that the totality of the circumstances presented in *Sizer* provided the officers with reasonable suspicion. *Id.* After the officers observed two possible criminal misdemeanors, the defendant's subsequent flight reasonably could have

heightened their suspicion that the defendant was the individual who threw the bottle. *Id.* As the Court explained, "in conducting their investigation the officers were not required to simply shrug their shoulders and allow an apparent criminal misdemeanant to escape." *Id.* (cleaned up).[9]

Bost involved a seizure after the defendant fled from police officers in a high-crime area. 406 Md. 341. There, officers investigating street-level narcotics and firearms offenses approached a group of people drinking alcohol on the sidewalk. *Id.* at 346. From the group, the defendant immediately began walking away from the officers before eventually speeding up and running away. *Id.* While he fled, the defendant continuously looked back and appeared to be holding something in his waistband. *Id.*

The Court held that the defendant's unprovoked flight in a high-crime area while clutching his side supported the officers' reasonable suspicion to seize him. *Id.* at 359–60. Although the Court fully analyzed the totality of the circumstances, it emphasized the defendant's unprovoked flight. *Id.* Citing to the United States Supreme Court decision in *Illinois v. Wardlow*, 528 U.S. 119, 134 (2000), the Court expressed that it is "clear that unprovoked flight is *enough* to support reasonable suspicion that a crime has been committed." *Bost*, 406 Md. at 358 (emphasis added).

[9] Although the officers testified that the area of the seizure was a "high[-]crime area," the Court did not reach a conclusion either way on whether it was. *See Sizer*, 456 Md. at 380 (Adkins, J., concurring in part) ("The Majority concludes that upon a review of the factors before the hearing judge, the officers had reasonable suspicion to detain Mr. Sizer for a possible open container violation and improper disposal of a bottle regardless of whether or not he was in a high[-]crime area.").

Besides his challenge to the circuit court's finding of flight, Mr. Tolliver seeks to distinguish his case from *Washington*, *Sizer*, and *Bost* by noting two factual differences.[10] First, he points out that he never committed a crime in front of Officer Bielecki as in *Sizer* and *Bost* where the officers observed the defendant amongst a group of people drinking alcohol in public. Second, Mr. Tolliver notes that Officer Bielecki did not observe him grasping at his waistband or manipulating anything on his person.

Our analysis focuses, however, on whether the "totality of the circumstances, *i.e.*, the whole picture[,]" creates reasonable suspicion. *Washington*, 482 Md. at 421. In other words, appellate review of reasonable suspicion does not focus "on any set list of facts that must be present for reasonable suspicion to exist, but rather [] examine[s] the totality of the circumstances to determine whether an officer could reasonably suspect that criminal activity is afoot." *State v. Holt*, 206 Md. App. 539, 558 (2012), *aff'd*, 435 Md. 443 (2013). Thus, although Mr. Tolliver's case differs from *Washington*, *Sizer*, and *Bost* in the ways he claims, we do not find these differences dispositive. Instead, we focus on the information Officer Bielecki did have when he seized Mr. Tolliver.

Viewing the totality of the circumstances in this case, we conclude that Officer Bielecki had reasonable suspicion to seize Mr. Tolliver. At the time of the seizure,

[10] In his brief, Mr. Tolliver argues four differences: (1) Mr. Tolliver did not flee from the officer upon seeing him; (2) Mr. Tolliver did not commit a crime in front of the officer; (3) Mr. Tolliver did not clutch or grasp his waistband, and (4) Mr. Tolliver did not manipulate something on his person. As we have already addressed the circuit court's finding that Mr. Tolliver was engaged in flight, and we view the third and fourth differences Mr. Tolliver posits as essentially the same, we condense his arguments to streamline our analysis.

Officer Bielecki knew that an individual, described as a Black male wearing black clothing, and who was suspected of illegal drug and firearm activity, was at a liquor store that Officer Bielecki was familiar with and knew to be in an area where such activity was common. Seconds after Officer Bielecki's fellow officers entered the front entrance of the liquor store and as Officer Bielecki approached the side door, Mr. Tolliver emerged. He matched the physical description of the suspect, was carrying a black bag, and started to run. These circumstances were sufficient to clear the "low bar" necessary to establish reasonable suspicion. *See Washington*, 482 Md. at 452.

JUDGMENT OF THE CIRCUIT COURT FOR BALTIMORE CITY AFFIRMED; COSTS TO BE PAID BY APPELLANT.