

Circuit Court for Howard County
Case No. C-13-CR-24-000358

UNREPORTED*

IN THE APPELLATE COURT

OF MARYLAND

No. 1645

September Term, 2024

STEFAN RASAUN ARMOUR

v.

STATE OF MARYLAND

Berger,
Kehoe, S.,
Hotten, Michele D.
(Senior Judge, Specially Assigned),

JJ.

Opinion by Berger, J.

Filed: April 15, 2026

* 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).

This case arises from the conviction of Stefan Rasaun Armour (“Armour”), appellant, for multiple traffic offenses in the Circuit Court for Howard County. Armour was originally charged with several criminal, common law, and traffic offenses in the District Court for Howard County. Armour challenged the jurisdiction of the district court and sought to discharge his assigned public defender. The district court struck the appearance of the Office of the Public Defender. The case was transferred to the circuit court following Armour’s request for a jury trial, where Armour proceeded pro se. The jury convicted Armour on nine counts, and Armour was sentenced to a total of 60 days imprisonment and ordered to pay a \$50 fine. This appeal followed.

QUESTIONS PRESENTED

Armour presents two questions for our review, which we have recast and rephrased as follows:¹

- I. Whether the district court and the circuit court each violated Maryland Rule 4-215 when they failed to fully advise Armour when he sought to proceed pro se.
- II. Whether the circuit court erred in admitting the entirety of Armour’s driving record from the Maryland Motor Vehicle Administration (“MVA”).

¹ Armour phrased the questions as follows:

1. Did the court violate the dictates of Maryland Rule 4-215 by failing to advise Mr. Armour of the nature of the charges and allowable penalties as required by subsection (a)(3)?
2. Did the court err in admitting irrelevant and unfairly prejudicial propensity evidence in the form of thirty-two pages of Mr. Armour’s MVA records spanning two decades?

We hold that the district court violated Maryland Rule 4-215 when it failed to advise Armour of the charges against him and possible penalties when Armour sought to discharge counsel. Therefore, we must reverse the convictions and remand the case for further proceedings. We further decline to address Armour’s contentions that the circuit court also violated Rule 4-215 and that the circuit court erred in admitting his entire MVA driving record.

BACKGROUND

The traffic incident

On February 21, 2024, Howard County Police Officer Erica Farley conducted a traffic stop of Armour. The Traffic Enforcement Section had received a civilian complaint regarding an “ongoing reckless and aggressive driver” in a Chevrolet Suburban. Officer Farley saw the vehicle and observed that it was operating a vehicle without a Maryland license plate,² and instead had a false identification plate reading “Private Property DOT#4144734.” Officer Farley initiated a traffic stop, and Armour parked in a nearby shopping center. Officer Farley observed that Armour was not wearing a seatbelt, and that Armour’s four-year-old daughter was in the front passenger seat without a child’s safety seat. Officer Farley requested Armour produce his license and registration. Armour stated that he did not need a Maryland registration because his vehicle was “registered privately

² Office Farley testified at trial: “There was something in place of a plate that seemed to replicate a plate, but it wasn’t what I recognized to be a normal plate for any state in the country.”

through the DOT [United States Department of Transportation].” Armour did not produce a valid driver’s license or other identification and refused to provide his name.

Officer Farley retrieved the vehicle identification number for the Chevrolet and confirmed that the vehicle’s registration had been suspended in August 2022, and that the vehicle was not insured. Officer Farley was able to identify Armour from MVA records based on his physical description and confirmed that his license had been suspended. Officer Farley also confirmed that Armour had previously been stopped on numerous occasions for the same infraction and failed to appear in court. Officer Farley declined to arrest Armour because he was with his daughter and instead sought to impound the car. Armour refused to step out of the vehicle and refused to permit officers to impound the vehicle even after offered a ride home. Due to the location where Armour pulled over and Officer Farley parked her police vehicle, as well as Armour’s refusal to cooperate, Officer Farley stated that Armour “restricted the free flow of traffic and caused multiple citizens to stop their daily activity to see what was happening.”

Armour was charged in the district court with a total of sixteen offenses. Armour was charged with three criminal offenses, counts 1-3: (1) obstructing or hindering the free passage of another; (2) disorderly conduct that resulted in a disturbance of the public peace; and (3) failure to obey a reasonable and lawful order of a law enforcement officer. Armour was additionally charged with the common law offense of obstructing and hindering a police officer, count 4.

Finally, Armour was charged with twelve traffic offenses, counts 5-16: (5) driving on a suspended license and privilege; (6) driving while suspended; (7) allowing a vehicle

to be driven on highway with a suspended registration; (8) unauthorized display and use of a license plate; (9) falsifying with fraudulent intent an official document or plate issued by administration; (10) driving vehicle on highway without current registration plates; (11) driving vehicle on highway with a suspended registration; (12) operating unregistered vehicle on a highway; (13) failure to display a license; (14) failure of operator to wear a seatbelt; (15) failing to secure a child under eight in safety seat; and (16) knowingly driving an uninsured motor vehicle.

The District Court Proceedings

On June 16, 2024, Armour appeared in the district court with an assistant public defender, Mr. Roberts. The following colloquy ensued:

THE COURT: So are you being represented by the Public Defender's Office?

MR. ROBERTS: Yes, Your Honor. He is.

[ARMOUR]: Me -- well, me -- me, the man?

THE COURT: Yes.

[ARMOUR]: No. I'm not. But the name that's listed in the charging documents, yes, ma'am. So the name in the charging documents is -- is -- I can attest that that is me, but for that purpose.

THE COURT: Okay. So I guess the reason I am asking is because I think you have -- Mr. Roberts, I don't know if there is another public defender entered in another of your cases. And we can't do dual representations. So I would have to either have Mr. Roberts be the attorney who represents Stefan Armour, or have you be the person who is representing that individual yourself. Do you understand?

[ARMOUR]: That's -- no. That's totally understandable, ma'am.

THE COURT: So I need to know from you how you want me to proceed, whether you want Mr. Roberts to continue to represent you.

[ARMOUR]: I can represent myself as Stefan Rasuan Armour, the man. . . .

THE COURT: So let's get this part settled so that we know. Because if Mr. Roberts isn't going to be representing you, I would allow him to leave. Is it your intention to essentially fire Mr. Roberts, so that he won't be representing you?

I will tell you, too, if you fire Mr. Roberts, you fire the entire Public Defender's Office. Do you understand?

[ARMOUR]: I totally understand.

THE COURT: Okay. Do you also understand -- and just, I am sure you do, but to go over this again, an attorney can be helpful to you in explaining to you charges, the charges against you, and any defenses that you have, and helping you to secure witnesses and other evidence for trial.

As you noted, Mr. Roberts did pass the bar. He is an attorney. He is very well-versed in the rules of evidence and the laws. So he can be of assistance to you, but you are not required to have an attorney represent you. If you don't want to have him represent you, I would, again, let him go, and then you would represent yourself. Do you understand?

[ARMOUR]: To that -- to that regard, I would say . . . the individual in the charging documents, that entity, he would be representing them. But me, the man, I don't need anyone to represent me because, as I said before, I'm questioning jurisdiction. But on top of that, I don't -- I don't consent to this hearing.

* * *

THE COURT: . . . Regarding Mr. Roberts representing Stefan Armour, who has been charged in the charging documents. For the Court's purposes, that is one individual.

[ARMOUR]: Yes.

THE COURT: I understand that you are representing that you are representing the man.

[ARMOUR]: That's correct.

THE COURT: There is one individual. So Mr. Roberts would either be in the case or out the case.

[ARMOUR]: Mr. Roberts -- I don't need Mr. Roberts in the case.

THE COURT: Okay.

[ARMOUR]: I will speak for myself.

* * *

THE COURT: I am going to strike the appearance of the Office of the Public Defender. Okay. And you understand that, Mr. Armour, there won't be another postponement to get an attorney. You understand that, right?

[ARMOUR]: Yes. That's fine.

The district court dismissed the public defender, Mr. Roberts, and proceeded to hear Armour's argument that the district court lacked jurisdiction. The district court determined that it did have "jurisdiction over the misdemeanor criminal charges, as well as the serious traffic and minor traffic charges." The district court advised Armour that if he wanted to have a jury trial, the district court would lose jurisdiction, and the circuit court would instead have jurisdiction over the matter. Armour then requested a jury trial, and the matter was transferred to the Circuit Court for Howard County.

*The Circuit Court Proceedings*³

Armour’s case proceeded to the circuit court. On August 5, 2024, Armour appeared pro se in the circuit court. The circuit court inquired with Armour whether he intended to be represented by the Office of the Public Defender, who had represented him in the past. The circuit court then informed Armour that it would cover three things in the hearing: it would ensure that Armour received copies of the charging documents, advise Armour about his right to an attorney, and set dates for trial.

Armour reiterated that he would move forward without representation by a public defender. Armour again argued that the circuit court lacked jurisdiction over his person. The circuit court judge remarked that the court did have jurisdiction and advised Armour of his right to counsel. Armour then inquired about the nature of the charges, asking whether they were civil or criminal. The circuit court responded: “These are all criminal charges.” The circuit court then directed Armour to Title 4 of the Maryland Rules to assist him in filing a motion to dismiss. The circuit court additionally instructed Armour to look at the Transportation Article and the Criminal Law Article of the Maryland Code so that Armour could “read the statutes that each of the charging documents have.”

The circuit court proceeded to inquire about dates for the jury trial and suggested October 2024. After the State indicated that it had two manslaughter trials that month, the circuit court noted “the gentleman [Armour] is charged with . . . incarcerable traffic offenses and misdemeanor criminal offenses.” The circuit court set trial dates for October

³ Because we ultimately do not address Armour’s allegations of error by the circuit court, we include only a brief summary of facts relevant to his challenges.

2024. The circuit court then reiterated to Armour the benefit of having counsel. In doing so, it emphasized that attorneys are required to “follow the law and argue the law,” and as Armour continued to assert that the circuit court had no jurisdiction over him, an attorney likely would be unable to make that argument.

On September 13, 2024, Armour again appeared pro se at a motions hearing, arguing that the circuit court had no jurisdiction. The circuit court inquired whether Armour had been advised of his right to counsel, and Armour affirmed that he had been and did not want an attorney. The circuit court explained its jurisdiction to Armour and denied his motion. The circuit court then indicated that the case would proceed to trial.

Trial commenced on October 15, 2024. The trial judge listed the charges against Armour, then stated:

Maximum penalty it looks like is a year in jail and a \$1,000 fine for the driving while suspended as well as the driving uninsured. And the other ones have a \$500 fine and up to a 60-day maximum penalty. Obstructing and hindering is common law, any sentence that is not cruel or unusual.

Armour objected, again arguing that the circuit court lacked jurisdiction, and requesting that the State and the circuit court provide a document explaining how there was personal and subject matter jurisdiction. The circuit court denied Armour’s request and proceeded with the trial.

The State called Officer Farley, who testified as to the traffic incident resulting in the charges against Armour. The State then moved for admission of the entirety of Armour’s MVA driving record. The circuit court admitted the MVA record over Armour’s objection. When the jury retired to deliberate, Armour renewed his objection, stating:

I have an objection to State’s Exhibit Number 3. Because this goes way back to 2012 -- let me see -- 2009 -- it’s going back to 2004. And I don’t see where this has any relevance to the particular citation that we’re talking about. . . .

The circuit court noted that Armour’s MVA driving record had already been admitted, however, and therefore the jury was permitted to consider it during deliberations.

The jury ultimately convicted Armour of nine counts: count 3, the criminal charge of failure to obey a lawful order; count 4, the common law offense of obstructing and hindering; count 6, driving while suspended; count 8, unauthorized display and use of a license plate; count 9, falsifying with fraudulent intent an official document or plate issued by administration; count 10, driving vehicle on highway without current registration plates; count 13, failure to display a license; count 15, failing to secure a child under eight in safety seat; and count 16, knowingly driving an uninsured motor vehicle.

The circuit court sentenced Armour to 30 days pursuant to count 3, failure to obey a lawful order, and a consecutive 30 days under count 16, knowingly driving an uninsured motor vehicle. The circuit court additionally ordered Armour to pay a \$50 fine for count 15, failure to secure a child under eight in a safety seat. This appeal followed.

STANDARD OF REVIEW

“We review *de novo* whether the [trial] court complied with Rule 4–215. Strict compliance is required.” *Guttloff v. State*, 207 Md. App. 176, 180 (2012). *See also Pinkney v. State*, 427 Md. 77, 88 (2012) (“Our interpretation of the Maryland Rules is a question of law; as such, we review a trial court’s determinations on matters of interpretation without deference.”).

DISCUSSION

I. The district court failed to comply with Maryland Rule 4-215.

Armour argues that the district court failed to comply with Maryland Rule 4-215 because, during Armour's appearance where he sought to discharge his assigned public defender, the district court did not advise Armour of the nature of the charges against him and the allowable penalties, as required by Maryland Rule 4-215(a)(3). The State acknowledges this error by the district court and concedes that this constitutes reversible error.

Maryland Rule 4-215(e) provides in pertinent part:

(e) Discharge of Counsel--Waiver. If a defendant requests permission to discharge an attorney whose appearance has been entered, the court shall permit the defendant to explain the reasons for the request. If the court finds that there is a meritorious reason for the defendant's request, the court shall permit the discharge of counsel; continue the action if necessary; and advise the defendant that if new counsel does not enter an appearance by the next scheduled trial date, the action will proceed to trial with the defendant unrepresented by counsel. If the court finds no meritorious reason for the defendant's request, the court may not permit the discharge of counsel without first informing the defendant that the trial will proceed as scheduled with the defendant unrepresented by counsel if the defendant discharges counsel and does not have new counsel. If the court permits the defendant to discharge counsel, it shall comply with subsections (a)(1)-(4) of this Rule if the docket or file does not reflect prior compliance.

Subsections 4-215(a)(1)-(5) provide:

(a) First Appearance in Court Without Counsel. At the defendant's first appearance in court without counsel, or when the defendant appears in the District Court without counsel, demands a jury trial, and the record does not disclose prior compliance with this section by a judge, the court shall:

- (1) Make certain that the defendant has received a copy of the charging document containing notice as to the right to counsel.
- (2) Inform the defendant of the right to counsel and of the importance of assistance of counsel.
- (3) Advise the defendant of the nature of the charges in the charging document, and the allowable penalties, including mandatory penalties, if any.
- (4) Conduct a waiver inquiry pursuant to section (b) of this Rule if the defendant indicates a desire to waive counsel.
- (5) If trial is to be conducted on a subsequent date, advise the defendant that if the defendant appears for trial without counsel, the court could determine that the defendant waived counsel and proceed to trial with the defendant unrepresented by counsel.

As noted, Maryland Rule 4-215 requires strict compliance. *Gutloff*, 207 Md. App. at 180. “The requirements of Rule 4–215 ‘are mandatory and must be complied with, irrespective of the gravity of the crime charged, the type of plea entered, or the lack of an affirmative showing of prejudice to the accused’ because the right to counsel is a fundamental right.” *Knox v. State*, 404 Md. 76, 87 (2008) (quoting *Broadwater v. State*, 401 Md. 175, 182 (2007)). Accordingly, “a court’s failure to comply strictly with the Rule constitutes reversible error.” *State v. Camper*, 415 Md. 44, 55 (2010).

Notably, the district court may be the court required to provide the Rule 4-215 advisement. *See Johnson v. State*, 355 Md. 420, 453 (1999) (noting that the defendant “was to be advised of (a)(1) through (5) either when he appeared for the first time in the circuit court without counsel or when he appeared in the District Court without counsel

and demanded a jury trial.”). Maryland Rule 4-215(a)(3) specifically “exists to ensure that a defendant is made aware of all pending charges and associated penalties.” *Brye v. State*, 410 Md. 623, 637 (2009). “[A] court’s failure to provide the 4–215(a)(3) advisement renders a ‘waiver[] of counsel ineffective’ and requires reversal.” *Id.* at 642 (quoting *Parren v. State*, 309 Md. 260, 282 (1987)).

Armour argues that the district court failed to comply with Maryland Rule 4-215 because, during Armour’s appearance where he sought to discharge his assigned public defender, the district court did not advise Armour of the nature of the charges against him and the allowable penalties, as required by Rule 4-215(a)(3). The State acknowledges this error by the district court and agrees that this constitutes reversible error.

As noted above, the failure of the court to fully comply with the requirements of Maryland Rule 4-215(a)(3) constitutes reversible error. *Brye*, 410 Md. at 637. We, too, agree that the district court did not advise Armour of the nature of the charges pending him and the allowable penalties. Accordingly, we are constrained to reverse the judgments of conviction. Because we reverse due to the error of the district court, we decline to address Armour’s additional assertions of errors by the circuit court. We, therefore, vacate the judgments of the circuit court, and remand for further proceedings consistent with this opinion.

**JUDGMENTS OF THE CIRCUIT COURT
FOR HOWARD COUNTY VACATED.
CASE REMANDED FOR FURTHER
PROCEEDINGS CONSISTENT WITH
THIS OPINION. COSTS TO BE PAID BY
APPELLEE.**