

STATE OF MARYLAND

* IN THE

V.

* CIRCUIT COURT

WARREN WRIGHT

* FOR

* ANNE ARUNDEL COUNTY

* STATE OF MARYLAND

* CASE NO.:

CO2CR-17-3001

* * * * *

INDICTMENT

The Grand Jurors of the State of Maryland for the body of Anne Arundel County do on their Oath present that

I. Introduction and Background

At all times relevant to this Indictment:

1. Jessup Correctional Institution (“JCI”), located at 7804 House of Correction Road, Jessup, Maryland 20794, is a maximum-security correctional facility operated by the Maryland Department of Public Safety and Correctional Services (“DPSCS”). JCI has a total inmate capacity of 1,875.¹ JCI is divided into an administration building, supervisor and visiting suites, and six (6) housing units. Each housing unit consists of four (4) wings with a control center at the core except “A” building which has three (3) wings. The facility contains the Central Region Transportation Hub which is used to house inmates from other correctional facilities while traveling for court appearances, transfers, or for regional medical appointments.²

TRUE COPY
TEST: Robert Duckworth, Clerk
By: _____ Deputy

¹ According to the “Analysis of the FY 2018 Maryland Executive Budget, 2017”

² According to “200 years of Corrections in Maryland”, Division of Correction Annual Report Fiscal Year 2011

2. While incarcerated at JCI, inmates are assigned to a specific tier within one of the six housing units. Inmates may however have access to other inmates not assigned to their same housing unit or tier during periods of employment, religious services, periods of recreation, and meals.
3. Maryland law defines “contraband” as “any item, material, substance, or other thing that: (1) is not authorized for inmate possession by the managing official; or (2) is brought into the correctional facility in a manner prohibited by the managing official.” *Maryland Criminal Law §9-410*. Further, a person may not; “(1) deliver any contraband to a person detained or confined in a place of confinement; (2) possess any contraband with the intent to deliver it to a person detained or confined in a place of confinement; or (3) knowingly possess contraband in a place of confinement.” *Maryland Criminal Law §9-412*.
4. Maryland law also states that “a person may not: (1) deliver a controlled dangerous substance to a person detained or confined in a place of confinement; or (2) possess a controlled dangerous substance with the intent to deliver it to a person detained or confined in a place of confinement.” *Maryland Criminal Law §9-416(a)*. Further “a person detained or confined in a place of confinement may not knowingly possess or receive a controlled dangerous substance.” *Maryland Criminal Law §9-416(b)*.
5. Tyrone Johnson (“JOHNSON”) is an inmate incarcerated at JCI, where he has been incarcerated since January 2, 1997 for murder and handgun charges.
6. JOHNSON serves as one of the main sources of controlled dangerous substance (“CDS”) contraband smuggled into JCI, to include buprenorphine, heroin, cocaine, and fentanyl.
7. Since JOHNSON is incarcerated, he relies on outside facilitators to assist him in the smuggling and distribution of CDS contraband at JCI. Outside facilitators are responsible

for acquiring items of contraband; packaging the items of contraband; managing the financial aspect of the operation; and meeting with corrupt correctional officers, where payments of cash bribes are made in exchange for the CDS contraband being smuggled into JCI.

8. Inmates can purchase CDS directly from JOHNSON by sending payment for the purchase of the CDS through electronic fund transfers, such as *PayPal*, *PayPal My Cash* cards, *Western Union*, or *Walmart* money transfers. Inmates can also mail payment directly to one of JOHNSON's outside facilitators. Once JOHNSON confirms transfer of the payment, he provides the inmate with the CDS contraband that they purchased from him.
9. Inmates can also arrange through JOHNSON to have their own package of contraband smuggled into JCI. Inmates utilize their own outside facilitators to meet with JOHNSON's outside facilitators, whereupon they provide a package of contraband, along with a payment to JOHNSON, to have the contraband smuggled into JCI. JOHNSON directs and arranges these meetings between the respective outside facilitators, and sets the price that the inmates must pay to have the contraband smuggled into JCI. JOHNSON divides the payment between himself and his outside facilitators, and uses a portion of the payment to pay a cash bribe to a corrupt correctional officer to smuggle the CDS contraband into JCI.
10. Since as early as November 22, 2015, JOHNSON has been smuggling contraband into JCI through Warren Wright ("WRIGHT").

11. WRIGHT is a Correctional Officer II assigned to JCI. WRIGHT has been employed by DPSCS since July 28, 2000. JOHNSON pays WRIGHT a cash bribe for WRIGHT to smuggle CDS contraband into JCI.
12. Travis Johnson (“TRAVIS”), one of JOHNSON’s sons, is an outside facilitator for JOHNSON. TRAVIS is responsible for meeting with known and unknown outside facilitators, acquiring contraband, receiving payment for the purchase and/or smuggling of contraband, and for meeting with WRIGHT, where a cash bribe is paid in exchange for WRIGHT smuggling contraband into JCI.
13. Marquis Johnson (“MARQUIS”), one of JOHNSON’s sons, is an outside facilitator for JOHNSON. MARQUIS is responsible for meeting with known and unknown outside facilitators, acquiring contraband, receiving payment for the purchase and/or smuggling of contraband, and for meeting with WRIGHT, where a cash bribe is paid in exchange for WRIGHT smuggling contraband into JCI. In addition, MARQUIS is also involved in the financial aspect of the operation.
14. Latoya Carmichael (“CARMICHAEL”), the mother of one of JOHNSON’s grandchildren, is an outside facilitator for JOHNSON. CARMICHAEL is responsible for managing the transfer of funds from inmates purchasing CDS from JOHNSON. In telephone communications, JOHNSON provides CARMICHAEL with *PayPal My Cash* card numbers, *PayPal* email and/or account information, and *Western Union* money control transfer numbers. For *PayPal My Cash* card numbers, CARMICHAEL confirms the amount of money associated with the card number and uploads those funds, at JOHNSON’s direction, onto one of her *PayPal* accounts. For the electronic transfers of funds, CARMICHAEL confirms to JOHNSON that the funds were indeed transferred.

15. Between September of 2016 and March of 2017, CARMICHAEL uploaded \$7,790.00 from *PayPal My Cash* cards to one of her *PayPal* accounts associated with the email address of *lildominic7800@gmail.com*.
16. Kiana Littlejohn (“LITTLEJOHN”), the mother of two (2) of JOHNSON’s grandchildren, is an outside facilitator for JOHNSON. LITTLEJOHN is responsible for meeting with known and unknown outside facilitators, acquiring contraband, receiving payment for the purchase and/or smuggling of contraband, and for meeting with WRIGHT, where a cash bribe is paid in exchange for WRIGHT smuggling the contraband into JCI.
17. Thelma Powers (“POWERS”) is an outside facilitator for JOHNSON. POWERS is responsible for redeeming electronic money transfers at the direction of, and on behalf of JOHNSON, as well as meeting with known and unknown outside facilitators at JOHNSON’s direction. POWERS is also responsible for packaging CDS contraband, at JOHNSON’s direction, for the purpose of smuggling into JCI.
18. Kevin “Soldier” Cooper (“COOPER”), an inmate at JCI, has been incarcerated since May 11, 2009 for first degree rape, handgun, and other related charges. COOPER is one of the inmates who communicates with JOHNSON to arrange for the smuggling of CDS contraband into JCI.
19. Karisma Ashford (“ASHFORD”) is an outside facilitator for COOPER. ASHFORD is responsible for meeting with JOHNSON’s outside facilitators at the direction of COOPER, to supply CDS contraband to be smuggled into JCI for COOPER. ASHFORD also provides payment to JOHNSON’s outside facilitators.

COUNT ONE

Conspiracy to Distribute Controlled Dangerous Substances

The allegations contained in paragraphs 1-19 are re-alleged and incorporated herein as if set forth in full.

From on or about November 22, 2015 and through and including October 24, 2017 at Anne Arundel County, Maryland, JOHNSON, WRIGHT, TRAVIS, MARQUIS, CARMICHAEL, LITTLEJOHN, POWERS, COOPER, and ASHFORD, did conspire to unlawfully distribute controlled dangerous substances, including but not limited to heroin, a schedule I offense, cocaine, a schedule II offense, buprenorphine, a schedule III offense, and synthetic marijuana, a schedule I offense, to inmates inside of the Jessup Correctional Institution (JCI), a violation of §5-602(1) of the Criminal Law Article of the Annotated Code of Maryland, contrary to the Common Law, and against the peace, government, and dignity of the State.

*Conspiracy to violate §5-602(1)
Common Law
Penalty 20 years and/or \$15,000.00
CJIS Code 1C1118*

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

November 22 - 23, 2015

20. Between November 22, 2015 and November 23, 2015, JOHNSON and LITTLEJOHN communicated and made arrangements for the delivery of a CDS contraband package from LITTLEJOHN to WRIGHT, as well as for the payment of a cash bribe for WRIGHT to smuggle the CDS contraband package into JCI. During their communications, LITTLEJOHN advised JOHNSON that she received a package which was the size of a "six-inch sub." JOHNSON responded and said "Wow, a six-inch sub, yeah that's going to be, that's too much. Cus um, can the secretary hook it up where as though it's two trips?" LITTLEJOHN informed JOHNSON that it was "wrapped" in

“aluminum foil.” LITTLEJOHN also informed JOHNSON that she opened the package and that “it was ten of them” LITTLEJOHN then removed five of the items from the package, and told JOHNSON that “taking half out, it’s still like that.” LITTLEJOHN also told JOHNSON that she “took it apart” and can’t put it back together. JOHNSON asked “you wasn’t able to wrap it back up?” to which LITTLEJOHN replied “no.” In a subsequent communication, just three hours later, LITTLEJOHN confirmed to JOHNSON that she met with WRIGHT, and that WRIGHT was “gonna need more than one trip.” JOHNSON then told LITTLEJOHN that although he had told WRIGHT that he would give him “double” for an additional trip, JOHNSON would give him “six more.” LITTLEJOHN and JOHNSON communicated further and discussed making the additional payments to WRIGHT.

January 10 - 11, 2016

21. Between January 10, 2016 and January 11, 2016, JOHNSON and LITTLEJOHN communicated and made arrangements for the delivery of a CDS contraband package containing strips of buprenorphine, from LITTLEJOHN to WRIGHT as well as the payment of a cash bribe of \$800.00 for WRIGHT to smuggle the CDS contraband package into JCI. During their communications JOHNSON asked LITTLEJOHN if she could get “eight tonight.” JOHNSON then informed LITTLEJOHN that he told WRIGHT that LITTLEJOHN “would have four” but “could get four more tomorrow.” LITTLEJOHN met with WRIGHT on January 10, 2016 and provided him with the CDS contraband package as well as the payment of a bribe in the amount of \$500.00 to smuggle the CDS contraband package into JCI. In subsequent communications between

JOHNSON and LITTLEJOHN, the two further discussed LITTLEJOHN meeting with WRIGHT in the future to pay him the remaining \$300.00 of the \$800.00 cash bribe.

May 3 - 4, 2016

22. Between May 3, 2016 and May 4, 2016, JOHNSON and LITTLEJOHN communicated and made arrangements for the delivery of a CDS contraband package from LITTLEJOHN to WRIGHT as well as for the payment of a cash bribe of \$400.00 for WRIGHT to smuggle the CDS contraband package into JCI.

March 3, 2017

23. On March 3, 2017, JOHNSON communicated with CARMICHAEL. During their communication, JOHNSON instructed CARMICHAEL to let MARQUIS know that "somebody going to call him tonight" and that if it's before "12", to call WRIGHT. CARMICHAEL agreed and then JOHNSON told her that "It's okay to call [WRIGHT] and [WRIGHT] going to come pick it up so it can go to [JCI] tomorrow." CARMICHAEL clarified with JOHNSON and asked if he wanted her to text message MARQUIS or WRIGHT. JOHNSON confirmed that she should send the text message to MARQUIS because "they're gonna call Marquis."

March 9 - 14, 2017

24. Between March 9, 2017 and March 14, 2017, JOHNSON and TRAVIS communicated and made arrangements for the delivery of two (2) CDS contraband packages, one of which contained strips of buprenorphine from TRAVIS to WRIGHT, as well as for the payment of a cash bribe of \$700.00 for WRIGHT to smuggle the CDS contraband packages inside of JCI. During their communications, JOHNSON asked TRAVIS how big the packages were and TRAVIS informed him that both of them together were "like a

hot dog roll” “with the hot dog in it.” On March 13, 2017 between approximately 10:00 pm and 11:00 pm, TRAVIS met with WRIGHT.

March 15 - 20, 2017

25. Between March 15, 2017 and March 20, 2017, JOHNSON, TRAVIS, and MARQUIS communicated and made arrangements for the delivery of a CDS contraband package to WRIGHT, as well as for the payment of a cash bribe for WRIGHT to smuggle the CDS contraband package into JCI. During their communications, TRAVIS informed JOHNSON that “they was wrapped up. Both of them were inside...yeah, they were the same size.” To which JOHNSON replied, “so about how big, an eggroll size?” and TRAVIS replied “Yeah, a little smaller.” On March 19, 2017 between approximately 10:30 pm and 11:00 pm, TRAVIS and WRIGHT met on or near Baltimore Street in Baltimore, Maryland. In subsequent communication, TRAVIS confirmed to JOHNSON that he gave WRIGHT “seven.”

March 31 – April 2, 2017

26. Between May 29, 2017 and June 2, 2017, JOHNSON, TRAVIS and MARQUIS communicated and made arrangements for the delivery of a CDS contraband package, which contained strips of buprenorphine, to WRIGHT, as well as for the payment of a cash bribe of \$450.00 for WRIGHT to smuggle the CDS contraband package into JCI, along with a “crab cake” for JOHNSON. During their communications, JOHNSON reminded TRAVIS that “the box can’t be but so big.” JOHNSON also instructed TRAVIS to give WRIGHT “450”, fifty of which is payment for a “crab cake.” On June 1, 2017, MARQUIS met with WRIGHT.

April 26 - 28, 2017

27. Between April 26, 2017 and April 28, 2017, JOHNSON and TRAVIS communicated and made arrangements for the delivery of a CDS contraband package, which contained sixty-five strips of buprenorphine, as well as heroin and cocaine, from TRAVIS to WRIGHT, as well as for the payment of a cash bribe of \$400.00 for WRIGHT to smuggle the CDS contraband package into JCI. During their communications, TRAVIS informed JOHNSON that the package “wasn’t wrapped up this time, it’s like loose.” TRAVIS also told JOHNSON that “it was kinda big, it probably would come out to like four egg rolls maybe.” On April 26, 2017, at approximately 10:00 pm, TRAVIS met with WRIGHT. During subsequent communications, TRAVIS told JOHNSON that WRIGHT said “it was too much” but that he was going to “bring half” and then bring the other half as soon as he gets another four hundred dollars (\$400.00).

May 29 – June 2, 2017

28. Between May 29, 2017 and June 2, 2017, JOHNSON, TRAVIS and MARQUIS communicated and made arrangements for the delivery of a CDS contraband package, which contained strips of buprenorphine, to WRIGHT, as well as for the payment of a cash bribe of \$450.00 for WRIGHT to smuggle the CDS contraband package into JCI, along with a “crab cake” for JOHNSON. During their communications, JOHNSON reminded TRAVIS that “the box can’t be but so big.” JOHNSON also instructed TRAVIS to give WRIGHT “450”, fifty of which is payment for a “crab cake.” On June 1, 2017, MARQUIS met with WRIGHT.

July 13 - 14, 2017

29. Between July 13, 2017 and July 14, 2017, JOHNSON and MARQUIS communicated and made arrangements for the delivery of a CDS contraband package from MARQUIS to

WRIGHT, as well as for the payment of a cash bribe for WRIGHT to smuggle the CDS contraband package into JCI. During these communications, JOHNSON inquired of MARQUIS if he had called WRIGHT, to which MARQUIS replied "no." JOHNSON then said "Yeah don't wait. They off now. You ain't gotta wait until 11 o'clock. They probably come as soon as you call them." On July 13, 2017, at approximately 9:26 pm MARQUIS met with WRIGHT.

August 6 - 11, 2017

30. Between August 6, 2017 and August 11, 2017, JOHNSON, TRAVIS, ASHFORD, and COOPER communicated and made arrangements for the delivery of a CDS contraband package to WRIGHT, as well as for the payment of a cash bribe of \$600.00 for WRIGHT to smuggle the CDS contraband package into JCI. During these communications, COOPER told ASHFORD that "We gonna handle our business tomorrow cause Ty was just down here." In subsequent communications, ASHFORD confirmed to COOPER that she met with an unknown female and received eight hundred dollars (\$800.00). COOPER suggested that ASHFORD "should get a ride to Ty's son". COOPER provided ASHFORD with telephone numbers for MARQUIS and TRAVIS. ASHFORD confirmed to COOPER that in the past she has communicated and met with JOHNSON's son with the "985" number. In communications with JOHNSON, TRAVIS informed him that he had "just seen" someone who gave him "eight." TRAVIS described the package that he received as "like an envelope...probably with the baseball cards in it." JOHNSON asked TRAVIS if "the t-shirts (buprenorphine) in the pack?" to which TRAVIS replied "I think so". JOHNSON informed TRAVIS that the "t-shirts can't go in the pack" and said "yeah take care of that for me. They got to come out, they got to be out of the pack." On August

8, 2017, at approximately 11:33 pm TRAVIS met with WRIGHT in the 2800 block of West Baltimore Street in Baltimore, Maryland. Prior to this meeting, WRIGHT sent TRAVIS two (2) text messages, "Hey can we meet tonight" and "Hey im here." Shortly after the second text message, TRAVIS entered the front passenger seat of WRIGHT's registered 2010 Cadillac, where he remained for approximately forty-four (44) seconds before exiting from the vehicle.

September 21, 2017

31. On September 21, 2017, POWERS and MARQUIS communicated during which POWERS told MARQUIS that his father (JOHNSON) "said to text" WRIGHT and not to forget to meet him.

September 24 - 25, 2017

32. Between September 24, 2017 and September 25, 2017, JOHNSON and MARQUIS communicated and made arrangements for the delivery of a CDS contraband package which contained strips of buprenorphine as well as cocaine, from MARQUIS to WRIGHT, as well as for the payment of a cash bribe of \$500.00 for WRIGHT to smuggle the CDS contraband package into JCI. On September 24, 2017, at approximately 9:35 pm, MARQUIS placed a call to WRIGHT and informed him that he was ready. WRIGHT asked MARQUIS if they were going to meet "at that same spot?" to which MARQUIS replied "yeah" WRIGHT informed MARQUIS that he would be there in fifteen minutes. At approximately 9:50 pm, WRIGHT met with MARQUIS near the intersection of West Mulberry Street and North Gilmore Street in Baltimore, Maryland, during which time MARQUIS entered the front passenger seat of a rental vehicle operated by WRIGHT.

On September 25, 2017, at approximately 2:38 pm, WRIGHT arrived for his scheduled shift at JCI, wearing his correctional uniform. WRIGHT was intercepted as he attempted to enter into JCI and a search and seizure warrant was executed. Recovered from WRIGHT's left sock was a plastic baggie which contained one-hundred and nine (109) strips of buprenorphine, individually wrapped and recovered from WRIGHT's right sock was a plastic baggie which contained approximately forty (40) grams of cocaine, individually wrapped into forty-eight (48) smaller plastic baggies.

October 5, 2017

33. On October 5, 2017, POWERS called ASHFORD and said "I'm calling for Ty [JOHNSON], I was told to meet you today." ASHFORD confirmed that she was on her way to meet POWERS. At approximately 12:00pm, POWERS and ASHFORD met at the 7 Star convenience store in Baltimore, Maryland. The in-person interaction between POWERS and ASHFORD lasted for approximately five seconds.

October 11, 2017

34. On October 11, 2017, at approximately 12:34pm, JOHNSON and POWERS communicated, during which time POWERS informed JOHNSON that ASHFORD was calling her on her other line [other telephone line]. POWERS then told JOHNSON that ASHFORD "said Solider [COOPER] want to know could you take something instead of the eight [\$800.00]." POWERS then said "Ty [JOHNSON], he want to know if you could take a third of the \$800". JOHNSON instructed POWERS to ask ASHFORD "how much do he have?" POWERS told JOHNSON that ASHFORD will call her back.

35. On October 11, 2017, during the same communication between JOHNSON and POWERS, JOHNSON instructed POWERS to call TRAVIS using the three-way calling

feature on her telephone. When TRAVIS joined the call, JOHNSON asked TRAVIS to get the “scripts” [buprenorphine] to POWERS so that she “can set them up.” In subsequent communications between TRAVIS and POWERS, the two communicated and arranged to meet so that TRAVIS could provide POWERS with the buprenorphine.

36. On October 11, 2017, at approximately 3:40pm, POWERS traveled from her residence to the intersection of Baltimore Street at Franklinton Road in Baltimore, Maryland, where she met with and received the buprenorphine from TRAVIS.

October 16, 2017

37. On October 13, 2017, JOHNSON and POWERS communicated, during which time POWERS informed JOHNSON that she “did them things last night [repacked the buprenorphine to be smuggled into JCI].” POWERS explained to JOHNSON that she “got them on top of each other. Then [she] wrapped it up a little bit with plastic. Then [she] double wrapped it again. Then [she] stuck it in the finger glove and tied it, and then [she] stuck it in another one [glove] and tied it and cut the rest of it off. It was real small.” JOHNSON asked POWERS “Can you put it up your butt?” POWERS confirmed that you could.

October 16, 2017

38. On or about October 16, 2017, at JOHNSON’s direction, POWERS met with TRAVIS and gave him her cellular telephone so that he could continue to communicate with outside facilitators, including ASHFORD.

39. On October 16, 2017, JOHNSON and TRAVIS communicated using the cellular telephone which POWERS had provided to TRAVIS. During this communication,

JOHNSON informed TRAVIS that “Soldier’s [COOPER] people” were going to contact him.

October 18, 2017

40. On October 18, 2017, during communications between JOHNSON and POWERS, POWERS informed JOHNSON that she had received a call from ASHFORD who asked for JOHNSON’s son’s telephone number. JOHNSON instructed POWERS to provide ASHFORD with the telephone number to the cellular telephone which POWERS had given TRAVIS to use on or about October 16, 2017. POWERS informed JOHNSON that she had already texted that number to ASHFORD, who responded with a text that said “thank you.”

41. On October 18, 2017, JOHNSON communicated with ASHFORD and asked her if she called his son yet. ASHFORD told JOHNSON that she was going to “run to the bank” and then see if JOHNSON’s son could come “pick it up”.

COUNT TWO

Bribery

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about September 24, 2017, through and including September 25, 2017, WRIGHT, a correctional officer and employee of the State of Maryland, did receive something of value from JOHNSON and MARQUIS with the intent to be influenced in the performance of his official duties to wit: did receive a cash bribe of \$500.00 from JOHNSON and MARQUISto smuggle CDS contraband into the Jessup Correctional Institution (JCI), a place of confinement

located in Anne Arundel County, Maryland, in violation of §9-201(c) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government, and dignity of the State.

Criminal Law §9-201(c)
Penalty 12 years and/or \$5,000.00
CJIS Code 1_5103

COUNT THREE

Possession with the Intent to Distribute – Cocaine

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about September 24, 2017 through and including September 25, 2017 in Anne Arundel County, Maryland, JOHNSON, MARQUIS and WRIGHT, did possess a controlled dangerous substance of Schedule II, to wit: cocaine, a narcotic drug, in sufficient quantity under all the circumstances to indicate reasonably an intent to distribute such controlled dangerous substance in violation of §5-602(2) of the Criminal Law Article of the Annotated Code of Maryland, and against the peace, government, and dignity of the State.

Criminal Law §5-602(2)
Penalty 20 years and/or \$25,000.00
CJIS Code 3_0233

COUNT FOUR

Possession with the Intent to Distribute – Buprenorphine

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about September 24, 2017 through and including September 25, 2017 in Anne Arundel County, Maryland, JOHNSON, MARQUIS, and WRIGHT, did possess a controlled dangerous substance of Schedule III, to wit: buprenorphine, in sufficient quantity under all the circumstances to indicate reasonably an intent to distribute such controlled dangerous substance in violation of §5-602 of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government, and dignity of the State.

Criminal Law §5-602
Penalty 5 years and/or \$15,000.00
CJIS Code 1_0233

COUNT FIVE

Possession – Cocaine

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about September 24, 2017 through and including September 25, 2017 in Anne Arundel County, Maryland, JOHNSON, MARQUIS and WRIGHT, did possess a controlled dangerous substance of Schedule II, to wit: cocaine, a narcotic drug, in violation of §5-601(a)(1) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government, and dignity of the State.

Criminal Law §5-601(a)(1)
Penalty 4 years and/or \$25,000.00
CJIS Code 4_3550

COUNT SIX

Possession – Buprenorphine

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about September 24, 2017 through and including September 25, 2017 in Anne Arundel County, Maryland, JOHNSON, MARQUIS and WRIGHT, did possess a controlled dangerous substance of Schedule III, to wit: buprenorphine, a narcotic drug, in violation of §5-601(a)(1) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government, and dignity of the State.

Criminal Law §5-601(a)(1)
Penalty 4 years and/or \$25,000.00
CJIS Code 4_3550

COUNT SEVEN

CDS Contraband - Cocaine

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about September 24, 2017 through and including September 25, 2017, in Anne Arundel County, Maryland, JOHNSON, MARQUIS and WRIGHT, did possess a controlled dangerous substance, to wit: cocaine with the intent to deliver it to JOHNSON who was detained at the Jessup Correctional Institution (JCI), a place of confinement in violation of §9-416(a)(2) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government, and dignity of the State.

Criminal Law §9-416(a)(2)
Penalty 3 years and/or \$1,000.00
CJIS Code 2_1097

COUNT EIGHT

CDS Contraband - Buprenorphine

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about September 24, 2017 through and including September 25, 2017, in Anne Arundel County, Maryland, JOHNSON, MARQUIS and WRIGHT, did possess a controlled dangerous substance, to wit: buprenorphine with the intent to deliver it to JOHNSON who was detained at the Jessup Correctional Institution (JCI), a place of confinement in violation of §9-416 (a)(2) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government, and dignity of the State.

Criminal Law §9-416(a)(2)
Penalty 3 years and/or \$1,000.00
CJIS Code 2_1097

COUNT NINE

Bribery

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about August 6, 2017, through and including August 8, 2017, WRIGHT, a correctional officer and employee of the State of Maryland, did receive something of value from JOHNSON and TRAVIS with the intent to be influenced in the performance of his official duties to wit: did receive a cash bribe of \$600.00 from JOHNSON and TRAVIS to smuggle contraband into Jessup Correctional Institution, a place of confinement located in Anne Arundel County, Maryland, in violation of §9-201(c) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government and dignity of the State.

Criminal Law §9-201(c)
Penalty 12 years and/or \$5,000.00
CJIS Code 1_5103

COUNT TEN

Bribery

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about July 13, 2017, through and including July 14, 2017 WRIGHT, a correctional officer and employee of the State of Maryland, did receive something of value from JOHNSON and MARQUIS with the intent to JOHNSON and MARQUIS to smuggle contraband into Jessup Correctional Institution, a place of confinement located in Anne Arundel County, Maryland, in violation of §9-201(c) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government and dignity of the State.

Criminal Law §9-201(c)
Penalty 12 years and/or \$5,000.00
CJIS Code 1_5103

COUNT ELEVEN

Bribery

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about May 29, 2017, through and including June 2, 2017 WRIGHT, a correctional officer and employee of the State of Maryland, did receive something of value from JOHNSON, TRAVIS and MARQUIS with the intent to be influenced in the performance of his official duties to wit: did receive a cash bribe of \$450.00 from JOHNSON, TRAVIS and MARQUIS to smuggle contraband into Jessup Correctional Institution, a place of confinement located in Anne

Arundel County, Maryland, in violation of §9-201(c) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government and dignity of the State.

Criminal Law §9-201(c)
Penalty 12 years and/or \$5,000.00
CJIS Code 1_5103

COUNT TWELVE

Bribery

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about April 26, 2017, through and including April 28, 2017, WRIGHT, a correctional officer and employee of the State of Maryland, did receive something of value from JOHNSON and TRAVIS with the intent to be influenced in the performance of his official duties to wit: did receive a cash bribe of \$400.00 from JOHNSON and TRAVIS to smuggle CDS contraband into Jessup Correctional Institution, a place of confinement located in Anne Arundel County, Maryland, in violation of §9-201(c) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government and dignity of the State.

Criminal Law §9-201(c)
Penalty 12 years and/or \$5,000.00
CJIS Code 1_5103

COUNT THIRTEEN

Bribery

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about March 31, 2017, through and including April 2, 2017, WRIGHT, a correctional officer and employee of the State of Maryland, did receive something of value from JOHNSON and TRAVIS with the intent to be influenced in the performance of his official duties to wit: did receive a cash bribe of \$500.00 from JOHNSON and TRAVIS to smuggle contraband into Jessup Correctional Institution, a place of confinement located in Anne Arundel County, Maryland, in violation of §9-201(c) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government and dignity of the State.

Criminal Law §9-201(c)
Penalty 12 years and/or \$5,000.00
CJIS Code 1_5103

COUNT FOURTEEN

Bribery

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about March 15, 2017, through and including March 20, 2017, WRIGHT, a correctional officer and employee of the State of Maryland, did receive something of value from JOHNSON and TRAVIS with the intent to be influenced in the performance of his official duties to wit: did receive a cash bribe of \$700.00 from JOHNSON and TRAVIS to smuggle contraband into Jessup Correctional Institution, a place of confinement located in Anne Arundel County, Maryland, in violation of §9-201(c) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government and dignity of the State.

Criminal Law §9-201(c)
Penalty 12 years and/or \$5,000.00
CJIS Code 1_5103

COUNT FIFTEEN

Bribery

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about March 9, 2017, through and including March 14, 2017, WRIGHT, a correctional officer and employee of the State of Maryland, did receive something of value from JOHNSON and TRAVIS with the intent to be influenced in the performance of his official duties to wit: did receive a cash bribe of \$700.00 from JOHNSON and TRAVIS to smuggle contraband into Jessup Correctional Institution, a place of confinement located in Anne Arundel County, Maryland, in violation of §9-201(c) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government and dignity of the State.

Criminal Law §9-201(c)
Penalty 12 years and/or \$5,000.00
CJIS Code 1_5103

COUNT SIXTEEN

Bribery

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about May 3, 2016, through and including May 4, 2016, WRIGHT, a correctional officer and employee of the State of Maryland, did receive something of value from JOHNSON and LITTLEJOHN with the intent to be influenced in the performance of his official duties to wit: did receive a cash bribe of \$400.00 from JOHNSON and LITTLEJOHN to smuggle contraband into Jessup Correctional Institution, a place of confinement located in Anne Arundel County, Maryland, in violation of §9-201(c) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government and dignity of the State.

Criminal Law §9-201(c)
Penalty 12 years and/or \$5,000.00
CJIS Code 1_5103

COUNT SEVENTEEN

Bribery

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about January 10, 2016, through and including January 12, 2016, WRIGHT, a correctional officer and employee of the State of Maryland, did receive something of value from JOHNSON and LITTLEJOHN with the intent to be influenced in the performance of his official duties to wit: did receive a cash bribe of \$800.00 from JOHNSON and LITTLEJOHN to smuggle a package of contraband including buprenorphine into Jessup Correctional Institution, a place of confinement located in Anne Arundel County, Maryland, in violation of §9-201(c) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government and dignity of the State.

Criminal Law §9-201(c)
Penalty 12 years and/or \$5,000.00
CJIS Code 1_5103

COUNT EIGHTEEN

Bribery

The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

On or about November 22, 2015, through and including November 23, 2015, WRIGHT, a correctional officer and employee of the State of Maryland, did receive something of value from

JOHNSON and LITTLEJOHN with the intent to be influenced in the performance of his official duties to wit: did receive a cash bribe of from JOHNSON and LITTLEJOHN to smuggle CDS contraband into Jessup Correctional Institution, a place of confinement located in Anne Arundel County, in violation of §9-201(c) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government and dignity of the State.

Criminal Law §9-201(c)
Penalty 12 years and/or \$5,000.00
CJIS Code 1_5103

COUNT NINETEEN

(Misconduct in Office)

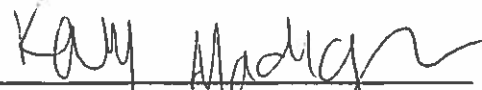
The allegations contained in paragraphs 1-41 are re-alleged and incorporated herein as if set forth in full.

From on or about November 22, 2015 through and including on or about September 25, 2017, at Anne Arundel County, Maryland, WRIGHT, in violation and perversion of his duties as a sworn correctional officer, did corruptly commit misconduct in office by knowingly, willfully and intentionally, under color of his authority, receive cash bribes in exchange for smuggling CDS contraband into Jessup Correctional Institution in violation of the common law and against the peace, government and dignity of the State.

Common Law
CJIS Code 2_0645

EMMET C. DAVITT
STATE PROSECUTOR

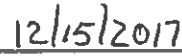
By:



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Grand Jury Foreman



Date Filed