

STATE OF MARYLAND

*

IN THE

V.

*

CIRCUIT COURT

JABRAIYL HALE

*

FOR

*

ANNE ARUNDEL COUNTY

*

STATE OF MARYLAND

*

CASE NO.: CO2CC-17-2958

* * * * *

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 1,875¹. 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 regional medical appointments².

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 (6) 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. Since they are incarcerated, inmates rely on outside facilitators to assist them in the smuggling of contraband into JCI. Outside facilitators are responsible for acquiring items of contraband; making and receiving payments for the acquisition of the items of contraband; packaging the items of contraband; and meeting with corrupt correctional officers, where payments of cash bribes are made in exchange for the contraband being smuggled into JCI.

6. Phillippe Jordan Jr. ("JORDAN"), a Correctional Officer II, assigned to JCI, has been employed by DPSCS since April 26, 2006. JORDAN has smuggled contraband into JCI for inmates in exchange for cash bribes since August of 2017. JORDAN used a cellular telephone to communicate with the outside facilitators of inmates, who paid him cash bribes to smuggle contraband into JCI.
7. Dante Bruce ("DANTE"), an inmate at JCI, has been incarcerated since March 9, 1994, for murder and handgun charges. DANTE served as one of the main sources of contraband, cellular telephones, and CDS contraband smuggled into JCI, including buprenorphine and synthetic marijuana. DANTE used multiple contraband cellular telephones to communicate with outside facilitators, as well as with other inmates on their contraband cellular telephones. DANTE arranged for payment of cash bribes to JORDAN for him to smuggle contraband into JCI.
8. Dwayne Gaffney ("GAFFNEY"), an inmate at JCI, has been incarcerated since February 5, 2009, for armed robbery and handgun charges. GAFFNEY is assigned to the same housing unit and tier as DANTE, and along with DANTE, GAFFNEY served as one of the main sources of contraband, cellular telephones, CDS contraband smuggled into JCI, including buprenorphine and synthetic marijuana. GAFFNEY used a contraband cellular telephone to communicate with outside facilitators, as well as with other inmates on their contraband cellular telephones.
9. Jabraiyl Hale ("HALE"), an inmate at the Western Correctional Institution ("WCI"), has been incarcerated since August 12, 2010, for carjacking, armed robbery, handgun and other related charges. HALE coordinated with GAFFNEY to acquire CDS contraband, including buprenorphine and synthetic marijuana, as well as other items of contraband

such as cellular telephones, to be smuggled into JCI. These items were then smuggled from JCI to WCI, where HALE was incarcerated, through inmates who traveled through the Central Region Transportation Hub, located at JCI. HALE used a contraband cellular telephone to communicate with outside facilitators, as well as with other inmates on their respective contraband cellular telephones.

10. Duane Dundas (“DUNDAS”), an inmate at JCI, has been incarcerated since November 18, 1992 for multiple unrelated homicide charges. DUNDAS served as one of the suppliers and sources of contraband at JCI, including cellular telephones. DUNDAS used a contraband cellular telephone to communicate with outside facilitators.
11. Donya Bruce (“DONYA”), the twin sister of DANTE, was one of his outside facilitators. DONYA used a cellular telephone to communicate with DANTE, GAFFNEY and DUNDAS, as well as other inmates, and the outside facilitators of those inmates. DONYA acquired contraband from those facilitators, received payments from those facilitators, packaged the contraband to be smuggled into JCI, and met with JORDAN, where cash bribes were paid in exchange for JORDAN to smuggle contraband into JCI.
12. Katina Bruce (“KATINA”), the wife of DANTE, was one of his outside facilitators. KATINA used a cellular telephone to communicate with DANTE and DONYA, as well as other outside facilitators. KATINA managed the finances of the contraband smuggling scheme, provided DONYA with funds to purchase contraband, and transferred contraband to DONYA to be smuggled into JCI.
13. Raeniece Board (“BOARD”), an associate of HALE, was one of his outside facilitators, and used a cellular telephone to communicate with HALE, GAFFNEY, and other inmates, as well as DONYA and other outside facilitators. BOARD acquired contraband from those

facilitators, transferred contraband and US currency to DONYA, to be given to JORDAN, along with the payment of cash bribes, in exchange for JORDAN to smuggle contraband into JCI.

14. Seingwaeng Hammond (“HAMMOND”), a female associate of DUNDAS, was one of his outside facilitators, and used a cellular telephone to communicate with DUNDAS and DONYA. HAMMOND acquired contraband, and provided DONYA with contraband, as well as US currency to have contraband smuggled into JCI.

15. Inmates are able to purchase contraband directly from DANTE, GAFFNEY, HALE and DUNDAS by making payments to them through their outside facilitators. Inmates are also able to pay DANTE, GAFFNEY, HALE and DUNDAS to have contraband smuggled into JCI, also by making payments to them through their outside facilitators. Payments are made through the outside facilitators either by way of electronic fund transfers or by the payment of US currency. Contraband is transferred between the outside facilitators and ultimately transferred to DONYA, along with payment in US currency to have the contraband smuggled into JCI. DONYA then condenses and repackages the contraband before meeting with JORDAN, where she provides him with contraband and payment of cash bribes to smuggle the contraband into JCI.

COUNT ONE

Conspiracy to Commit Bribery

The allegations contained in paragraphs 1-15 are re-alleged and incorporated herein as if set forth in full.

From on or about August 12, 2017, through and including October 24, 2017, at Anne Arundel County, Maryland, JORDAN, DANTE, GAFFNEY, HALE, DUNDAS, DONYA,

KATINA, BOARD and HAMMOND conspired to commit bribery; to wit: did agree to pay JORDAN a cash bribe in the amount of \$2,000.00 for him to smuggle contraband, cellular telephones and controlled dangerous substance (CDS) contraband into the Jessup Correctional Institution located in Anne Arundel County, Maryland, a violation of Maryland Common Law and against the peace, government and dignity of the State.

*Conspiracy to Commit Bribery
Common Law
Penalty 12 years/\$10,000 (Criminal Law Article §9-201)
CJIS Codes 1C_1437*

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

September 30, 2017

16. On September 30, 2017 just after 4:00 pm, DANTE called DONYA and told her that “*I need you to call slim [JORDAN] and find out when the fuck he going to give me my shit [package of contraband]...cause I ain’t get it yet.*” DONYA attempted to call to JORDAN using the three-way feature on her telephone but JORDAN did not answer DONYA’s call. DANTE informed DONYA that “*somebody did get knocked off this week though...a police [correctional officer] did...he probably didn’t bring it because of that.*” DONYA replied “*I hope it wasn’t him*” to which DANTE responded “*No it wasn’t, it wasn’t him...I know it wasn’t him for a fact*”. DANTE then instructed DONYA to ask JORDAN if “*he needs more money or something*” DONYA informed DANTE that she texted JORDAN.

17. During the conversation between DANTE and DONYA, DONYA and JORDAN engaged in the following conversation via text message:

DONYA: U good cuz they said u didn’t deliver the other stuff

JORDAN: This week

DONYA: *Ok but r u sure...cuz the dude is my <emoji>*

18. While still on the phone with DANTE, DONYA relayed the information from her text message communication with JORDAN, telling DANTE that *“he said this week.”* DANTE instructed DONYA to tell JORDAN that *“we need to make sure it's this week....so we can be prepared”* and that people have been *“waiting three months for that man.”* Later in the call, DANTE and DONYA discussed the contents of the package of six (6) *“logs”* which contained cigarettes, tobacco, synthetic marijuana, buprenorphine, pills, lighters, molly, *“white stuff”*, and five (5) phones, two (2) of which were flip phones. DONYA advised DANTE that everything was wrapped in black tape. DANTE informed DONYA that once he grabs *“this”*, he'll be ready for him [JORDAN] *“ASAP”*, and will have *“\$2,500 or more.”* DANTE also told DONYA that he needed her to *“grab”* his Invicta watch from KATINA and that GAFFNEY needed headphones.

October 2, 2017

19. On October 2, 2017 at approximately 5:04 pm, DANTE called DONYA and told her that *“they mailed them two phones there”* and asked her to let him know when she gets them, so that she can go *“pick that money up.”*
20. On October 2, 2017 at approximately 5:08 pm, DANTE called KATINA and they talked about the three watch phones which cost five hundred [\$500.00] a piece to *“get in”* [smuggled into JCI]. DANTE told KATINA that GAFFNEY still owed him some money, because GAFFNEY had not paid DANTE for the three (3) watch phones *“to come in.”* DANTE also told KATINA that HALE paid for his [phone] to get in, but that GAFFNEY did not pay for his [phone] to get in.

DANTE then said *“this what’s getting ready to come in”* and told KATINA that *“it was some molly and it was that other thing that you used to get me”*. KATINA asked DANTE if he was referring to “K2” [synthetic marijuana], and DANTE said “no”, he was referring to “H”. KATINA then asked DANTE if he meant “heroin” to which DANTE replied “yeah.” DANTE informed KATINA that there was *“fifteen (15) grams of heroin”* and *“a half ounce of molly”* for which someone only paid *“two fifty”* (\$250”). DANTE explained to KATINA that someone was *“still supposed to give us something off that”* because they *“still owe money.”* KATINA instructed DANTE *“When you do it again, ain’t no, ain’t no money off of the sales. It’s not getting no whatever. They pay the money up front, they get their shit, that’s it”* and *“before they get the stuff, they give you the money”*.

DANTE informed KATINA that it *“cost a thousand dollars (\$1,000.00) to get six (6) ounces of K [synthetic marijuana] in”*. DANTE also informed KATINA that HALE gave fifteen hundred (\$1,500.00) for the “K” [synthetic marijuana] and for his telephone, but did not pay for the “strips” [buprenorphine] or anything else that was in there. KATINA told DANTE *“this is the thing, you know what they was supposed to get in. If it was something else, you take it out, they didn’t pay for it, it’s not getting in.”* DANTE then told KATINA that *“Slim [JORDAN] is supposed to bring it this week, the rest of the stuff, but...I was thinking about, you know I’m gonna take these two phones and sell them...them two flip phones, because you didn’t pay for them to get in.”*

Later in the call DANTE told KATINA *“the other dude get knocked off right, so really I’m the only one, basically the only one who got the way to get the stuff in....now everybody want to come to me”*. KATINA responded *“No, whatever you have, that’s*

what you have. You not getting nobody shit". DANTE then told KATINA that *"I was going to get my watch in, my watch and my phone, my other phone in"*. KATINA replied *"I understand they want stuff to come in. Don't give nobody stuff to come in. Ask them what kind of stuff they want. You get it, you pay for it. They want it, they give you the money. That way they don't have no money invested in it."* KATINA also told DANTE that *"Once you get it you say okay, I got this. Do you want it? Send the money to boom boom boom, once I got the confirmation that it's picked up I'll give it to you"* and that *"You can't handle criminals and think they are going to be honest."*

October 5, 2017

21. On October 5, 2017 at approximately 5:47 pm, DANTE called KATINA and told her that he *"was separating this stuff with [GAFFNEY], making sure they get their stuff"* and *"making sure everything is right."*
22. On October 5, 2017 at approximately 5:48 pm, GAFFNEY called BOARD and asked her *"how many ounces did you have yo?"* and *"you said it was twelve"*, to which BOARD replied *"he [HALE] supposed to get seven, you supposed to have, ya'll supposed to have got five."* GAFFNEY replied *"Yeah I know that, but you saying it was twelve, and it, and out of all of that I got from you, it was only ten."* BOARD then stated *"No, that wasn't ten, it's impossible. That ain't true at all and I know that for a fact because I measured it myself."*
23. On October 5, 2017 at approximately 6:04 pm, GAFFNEY placed a three-way call to HALE and BOARD. GAFFNEY told them that when he *"bagged that big joint [package of synthetic marijuana] up it was seven when bagged"* and *"when I bagged up little joint [package of synthetic marijuana], it was three."* Later in the call, GAFFNEY told them that

"I only have fifty (50)" [strips of buprenorphine] and that there was "a nice amount of molly." HALE asked GAFFNEY to put some of the molly to the side for him.

October 8, 2017

24. On October 8, 2017 at approximately 5:45 pm, GAFFNEY called HALE and HALE said that he should "*have this together by this weekend*", to which GAFFNEY replied "*we are trying to grab it by Sunday.*"

25. On October 8, 2017 at approximately 5:46 pm, GAFFNEY called HALE and asked him to ask BOARD to "*smash*" the synthetic marijuana down so that they could fit it in "*two joints* [packages of contraband]." HALE told DANTE that he would tell BOARD to "*get it as small as she can get it.*" HALE also said "*I'm getting all good ass K* [synthetic marijuana] *this time.*"

26. On October 8, 2017 at approximately 6:22 pm, DANTE called KATINA and asked her to go to Walmart and to get four (4) Verizon flip phones. Dante told KATINA that preferred phones that hold videos. DANTE also told KATINA that she needed to get them before Friday so that DONYA could come pick them up from her.

October 11, 2017

27. On October 11, 2017 at approximately 4:35 pm, DANTE called KATINA and told her that the "*flat phone*" goes to GAFFNEY, and that she may need to go to the store and get them (the phones), or that DONYA or BOARD may need to get them because he needed them before Sunday.

October 12, 2017

28. On October 12, 2017, between approximately 1:26 pm and 2:00 pm, DONYA and DUNDAS engaged in the following conversation via text message:

DUNDAS: Hey Donya u good? did u get a phone in the mail?

DONYA: No not yet... im gd hru

October 13, 2017

29. On October 13, 2017, between approximately 1:06 pm and 1:17 pm, DONYA and DUNDAS engaged in the following conversation via text message:

DUNDAS: Donya how you doing,? Nothing reach as yet or did anybody call u to link

DONYA: No

DUNDAS: It suppose ti reach today n my man G suppose to meet up with u n give you some tobacco y met him before n also this girl supposed to have meet up to with a phone\$500 n the one in the mail when you receive it I will send \$500 walmart to Walmart okay u good with that

30. On October 13, 2017 at approximately 4:39 pm, GAFFNEY called HALE and told him that he was trying to get a touch-screen phone. GAFFNEY said that he does not want “Posh” [a brand of telephone] phones, and that he was looking on Amazon and saw “a little ass Galaxy joint, waterproof joint [cellular telephone]” that he might get.

31. On October 13, 2017, between approximately 4:44 pm and 4:46 pm, GAFFNEY and HALE engaged in the following conversation via text message:

GAFFNEY: Go ahead put them in there. How many tho?

HALE: 4

GAFFNEY: and u want 3?

HALE: 2 and 2 rite

GAFFNEY: yeah if that's cool wit u

32. On October 13, 2017 at approximately 4:45 pm, DANTE sent a text message to DONYA containing BOARD's name and telephone number.

33. On October 13, 2017, between approximately 9:39 pm and 10:15 pm, DUNDAS sent the following text messages to DONYA:

DUNDAS: hey u get nothing in the mail? call me

DUNDAS: a girl Yaya [HAMMOND] going to call u tomorrow with the phone \$500

October 14, 2017

34. On October 14, 2017 at approximately 2:09 pm, DONYA sent the following text message to JORDAN: *"Hey do u know what day u want to meet up"*

35. On October 14, 2017 between approximately 2:09 pm and 2:19 pm, DANTE sent the following text messages to DONYA:

DANTE: rayniece [BOARD] might have to bring it to u

DANTE: At ur job make sure u count the money

DANTE: I seen the watch and ring and she is home waiting on u.

36. On October 14, 2017 at approximately 4:03 pm, DONYA called JORDAN and asked *"what day you gonna be ready to pick up from me?"* JORDAN replied *"tell your people to clear it because my man had said don't, don't make no moves until, until he tells me to make moves so....clear it, clear that first."* To which DONYA asked *"Clear it?"* and JORDAN replied *"cause he told me not...yeah he told me not to do nothing, he said don't make no moves until he give me the okay."* DONYA told JORDAN *"Alright, well, when he calls back and give you the okay, let me know"* to which JORDAN said *"No, no, no, no, no, no, no. I won't see my man until...I don't talk on the phone with him. I see him...I won't see him until Monday, so if he give me the clear then I'll call you back."*

37. On October 14, 2017 at approximately 4:22 pm, DUNDAS called DONYA and told her that HAMMOND was supposed to call her. He then asked DONYA if it was okay to send a money order using Walmart to Walmart. In the same call, DUNDAS told DONYA that "his man" was supposed to meet her and give her "some tobacco" for him. DUNDAS then said to DONYA "You need all that money to bust a move. You know what I mean?"
38. On October 14, 2017 at approximately 4:36 pm, DUNDAS sent the following text message to DONYA: "Okay give u last name so I can send u the money." DONYA replied giving her name, street address, city, state and zip code.
39. On October 14, 2017, between approximately 2:27 pm and 5:58 pm, DANTE sent the following text messages to DONYA:
- DANTE: Sis what ur problem, if u want me to get someone to go out tina [KATINA] to get my watch and ring just let me know stop act crazy if u don't want to do something just let me know I just want to get out her hand*
- DANTE: Make sure u grab that stuff rayniece [BOARD] and that money she got*
40. On October 14, 2017 at approximately 7:19 pm, HAMMOND sent the following text message to DONYA: "This yaya. Call me when u free"
41. On October 14, 2017 at approximately 9:23 pm, DUNDAS sent the following text message to DONYA: "Hey Donya did u get \$500? N did u call Yaya [HAMMOND]?"
42. On October 14, 2017 at approximately 10:24 pm, HAMMOND sent the following text message to DONYA: "Im ready to meet tm. If u r"

October 15, 2017

43. On October 15, 2017 at approximately 7:15 am, DONYA sent the following text message to DUNDAS: "Im going to go in am"

44. On October 15, 2017 at approximately 7:15 am, DONYA sent the following text message to HAMMOND: *"Ok my fault I had to go to bed early 16 hrs...im gonna call u tm am."*
45. On October 15, 2017 at approximately 10:18 am, DUNDAS called DONYA and told her to tell DANTE that she had *"the phone and the money"* because DANTE *"wanted everything to reach the police [correctional officer]"* that day. DONYA told DUNDAS that *"the guy said he cannot do nothing until he get a clearance on Monday."* Later in the call, DUNDAS instructed DONYA to wrap the phone charger around the small phone because that comes to him too.
46. On October 15, 2017 at approximately 10:20 am, HAMMOND sent the following text message to DONYA: *"Ok. Just le me no"*
47. On October 15, 2017 at approximately 4:26 pm, DONYA sent the following text message to HAMMOND: *"Im at wrk 16 hrs...the guy say he has to get clearance to pick the stuff up...but im off tomorrow if u want to meet then"*
48. On October 15, 2017 at approximately 4:33 pm, DONYA sent the following text message to DUNDAS: *"I got the money..."*
49. On October 15, 2017 at approximately 4:45 pm, DANTE called DONYA and said that she went and picked up the money from DUNDAS and that it was only *"five."* DANTE told DONYA that it was supposed to be more than that and that he would talk to DUNDAS about it. DANTE then reminded DONYA that she needed to meet with BOARD, and DONYA said *"I already know, that the watch, Raeniece and the other guy."*
50. On October 15, 2017 at approximately 5:06 pm, BOARD sent the following text message to DONYA: *"Hello im suppose to bring you something whats your schedule Friday or sat?"*

51. On October 15, 2017 at approximately 5:29 pm, DANTE sent the following text message to DONYA: *“Sis make sure u call or text rayniece [BOARD] to let her know when to come but I need for u to grab that from her please and plus when u meet Major D [DUNDAS] people make sure u count the money from both people ok she say she text u plus nut [GAFFNEY] people there name is G they going to give u something for nut [GAFFNEY] so please holly at Raynise [BOARD]. Luv u”.*
52. On October 15, 2017 at approximately 5:35 pm, HALE called GAFFNEY and told him that he won't be able to get all of the money until the next day. GAFFNEY said that it was okay but that it would push things back. HALE said that he was *“putting all that money out for the K [synthetic marijuana].”*
53. On October 15, 2017 at approximately 6:30 pm, DANTE called KATINA and asked her to get *“two (2) cans of tobacco and a carton of Newports.”* DANTE informed KATINA that someone was going to Western Union her two hundred and ninety (\$290.00) and that he was going to ask DONYA to come pick everything up after 3pm. DANTE reminded KATINA about those *“flip joints”* [cellular telephones] and asked her to go to the store and look for them. He then told her that if she found them, they were going to buy four (4) of them and he would sell each one of them for five hundred (\$500.00). DANTE also told KATINA that he already told DONYA to *“give the dude [JORDAN] three thousand (\$3000.00) and everything in that bag”.*
54. On October 15, 2017 at approximately 7:17 pm, DANTE called DONYA and asked if she talked to BOARD. DANTE told DONYA that BOARD *“said she texted you, so make sure you text her.”*

55. On October 15, 2017, between approximately 7:31 pm and 7:51 pm, DONYA and HAMMOND engaged in the following conversation via text message:

HAMMOND: Ok. I don't know if he want to wait or just get it done. I will let u no my schedule tm. Hopefully I will talk to him by then

DONYA: K

DONYA: <thumbs up emoji>

56. On October 15, 2017 at approximately 9:48 pm, DUNDAS sent the following text message to DONYA: *"Hey Yaya (HAMMOND) text me ask when y all supposed to meet ok Donya."*

October 16, 2017

57. On October 16, 2017, between approximately 1:47 pm and 2:53 pm, DONYA and HAMMOND communicated via text message and arranged to meet at Mondawmin Mall.

58. On October 16, 2017, between approximately 2:46 pm and 2:57 pm, DANTE and DONYA engaged in the following conversation via text message:

DANTE: hey sis what's up

DANTE: did u talk to rayniece [BOARD]

DONYA: No she didn't call or text

DANTE: I'm going to call her now did major D [DUNDAS] people holly at u they don't have 7 they got 5 so get it and rayniece [BOARD] got 12 so lets grab it today if we can ok

DONYA: she got to call or text me

59. On October 16, 2017 at approximately 3:00 pm, DANTE placed a three-way call to BOARD and DONYA and coordinated a meeting between the two women at Arundel

Mills Mall. DANTE agreed to send BOARD's telephone number via text message to DONYA.

60. On October 16, 2017 at approximately 3:04 pm, DANTE sent a text message to DONYA containing BOARD's telephone number.

61. On October 16, 2017, between approximately 3:06 pm and 3:22 pm, DANTE and DONYA engaged in the following conversation via text message:

DANTE: Hey did major D [DUNDAS] people call u

DONYA: yea we suppose to meet some time today

DANTE: Ok I'm just try to grab that

DANTE: hey we got to get 3 cans of 8oz tobacco and 5 pack of new ports

DONYA: K

DANTE: but can I get tina [KATINA] to mail my stuff to u

DANTE: That will be easy right

DONYA: Yea since shit gonna take lo ger did u talk to dude [JORDAN]

DANTE: Yea.

DANTE: Ok where to mail it

DONYA: 2914 mcelderry street Baltimore Maryland 2120... wait a min gotta get zip code.

DANTE: text it to tina [KATINA]

DANTE: So she can have it please

DONYA: Ok

DANTE: She waiting thanks

62. On October 16, 2017 at approximately 5:37 pm, GAFFNEY called HALE and they discussed the contraband package. HALE confirmed that there was "smack" [heroin] in the contraband package along with five cellular telephones. HALE also said that there was a "Posh" phone for himself, a touch screen, a flip phone and a watch phone. GAFFNEY asked him to send all five (5) phones, including the touch screen for himself.

HALE told GAFFNEY that BOARD said “no more”, and that he was trying to get her to meet that night.

63. On October 16, 2017 at approximately 5:46 pm, BOARD sent the following text to

DONYA: “*What sur schedule for tomar.*”

64. On October 16, 2017 at approximately 5:48 pm, BOARD called DONYA and said that

she was “*the same person you supposed to meet on Saturday...Raeniece [BOARD].*” The two agreed to meet the following day.

65. On October 16, 2017 at approximately 7:01 pm, DONYA called HAMMOND and the

two discussed meeting the following day.

October 17, 2017

66. On October 17, 2017 at approximately 2:17pm, DANTE sent the following text message

to DONYA: “*hey sis gm I luv u send me the address so u can get my watch.*”

67. On October 17, 2017, between approximately 5:11 pm and 5:47 pm, DUNDAS and

HAMMOND communicated via text messages and discussed the scheduled meeting between DONYA and HAMMOND.

68. On October 17, 2017 at approximately 6:56 pm, HAMMOND sent the following text

message to DONYA: “*I’m in route. Is it still ok for me to come.*”

69. On October 17, 2017, between approximately 7:55 pm and 7:59 pm, DONYA and BOARD

communicated via telephone and discussed their locations. BOARD said that she was “*by the Walmart and the Cosco*” and flashed the headlights of her vehicle. BOARD asked “*what kind of car are you in?*” and DONYA replied “*a silver Dodge Stratus.*”

70. On October 17, 2017 at approximately 8:00 pm, DONYA and BOARD met at Arundel

Mills, at which time BOARD gave DONYA a plastic shopping bag.

71. On October 17, 2017 at approximately 8:10 pm, HAMMOND called DONYA and DONYA advised that she was leaving Arundel Mills and heading to Mondawmin Mall to meet HAMMOND.
72. On October 17, 2017 at approximately 8:30 pm, HAMMOND called DONYA and advised her that she was near the Bank of America (at Mondowmin Mall).
73. On October 17, 2017, between approximately 8:36 pm and 8:41 pm, DONYA and HAMMOND met at Mondawmin Mall.
74. On October 17, 2017 at approximately 8:48 pm, HAMMOND sent the following text message to DUDAS: "*Its done. Pls let him no.*"
75. On October 17, 2017, between approximately 11:42 pm and 11:43 pm, DUNDAS and HAMMOND corresponded via text message. HAMMOND informed DUNDAS that she provided DONYA a cellular telephone and phone charger.

October 18, 2017

76. On October 18, 2017, between approximately 5:35 pm and 5:37 pm, DANTE called DONYA and DONYA told him that she saw BOARD "*last night*" and that BOARD gave her "twelve" [\$1200.00]. DONYA also told DANTE that she saw HAMMOND, who gave her a "*phone*", a "*charger*" and an envelope which contained "*five*" [\$500.00].
77. On October 18, 2017 at approximately 7:13 pm, DANTE called DONYA and she again told him that she met with BOARD. DANTE asked "*what all Raeniece [BOARD] have in there?*" to which DONYA replied "*a whole lot of K2*" [synthetic marijuana] and four (4) cellular telephones. DANTE then instructed DONYA to get four (4) cans of "*brown*" [tobacco] and to "*do it the way you did it.*" DANTE reminded her that she opened the carton of cigarettes and "*threw them in there.*" DONYA said that she will get the cans and

cigarettes “before Sunday.” DANTE also asked DONYA to “grab four (4) lighters.”

DANTE further said that KATINA already had some lighters, and that she mailed them to DONYA. DANTE then asked DONYA if she could go to Anne Arundel on Saturday to “meet somebody who was going to have something else.”

78. On October 18, 2017 at approximately 7:17 pm, DANTE called KATINA and she informed him that she was going to send the lighters, the ring and the watch to DONYA via UPS the following day. KATINA also told DANTE that if “Donya know um what brown [tobacco] look like...she can get that...I'll just send her some money and she can get it.”

October 19, 2017

79. On October 19, 2017 at approximately 10:25 am, GAFFNEY called HALE and the two discussed the “K” [synthetic marijuana] and the cellular telephones which BOARD put in the contraband package which she gave to DONYA. HALE advised that he put four (4) phones and “smack” [heroin] in there, but did not put the “strips” [buprenorphine] in because he already received them. GAFFNEY told HALE that it was “taking off on Sunday.”

October 21, 2017

80. On October 21, 2017 at approximately 9:54 am, DANTE called DONYA and asked her if she got his “stuff” and if she liked his watch and his ring.
81. On October 21, 2017, at approximately 11:17 am, DANTE called DONYA and the two discussed getting money from KATINA via Western Union to pay for the tobacco.
82. On October 21, 2017, between approximately 11:26 am and 12:12 pm, DONYA and KATINA engaged in the following conversation via text message:

KATINA: 5997475335 it's 90

DONYA: *Ok*

83. On October 21, 2017 at approximately 12:23 pm, DONYA called KATINA and the two discussed the Western Union transaction.
84. On October 21, 2017 at approximately 12:41 pm, DONYA redeemed the \$90.00 Western Union money order sent from KATINA, with money transfer control number 5997475335, to purchase the tobacco.
85. On October 21, 2017 at approximately 7:33 pm, DONYA sent the following text message to JORDAN: "*R u meeting me tomorrow.*"

October 22, 2017

86. On October 22, 2017 at approximately 11:57 am, DANTE called DONYA and asked her if everything "*went okay.*" DONYA confirmed that it did, and said that "*he pressed everything.*" DANTE then asked DONYA to buy him a T-Mobile card for his Samsung Android Galaxy S5 phone. DANTE also asked DONYA how many "*logs*" [packages of contraband] they had, and DONYA said that is was "*probably five (5) or six (6).*" DONYA then told DONYA that there were "*strips*" [buprenorphine] in there, as well as "*little brown balls* [synthetic marijuana] *which were wrapped.*"
87. On October 22, 2017 at approximately 5:10 pm, DONYA sent the following text messages to JORDAN:
- DONYA: *Hello*
- DONYA: *<thumbs up emoji>*
88. On October 22, 2017 at approximately 5:26 pm, JORDAN called DONYA, but she did not answer.

89. On October 22, 2017 at approximately 8:28 pm, DONYA called JORDAN, but he did not answer.
90. On October 22, 2017 at approximately 8:34 pm, DONYA sent the following text message to JORDAN: *"My fault for missing ur call earlier but my phone was going dead at the time jus hit me when ur ready....i do have to compress something else...I work tomorrow but I can be ready tomorrow night"*
91. On October 22, 2017 at approximately 8:35 pm, DANTE sent the following text message to DONYA: *"Did slim [JORDAN] call"*
92. On October 22, 2017 at approximately 8:35 pm, JORDAN called DONYA, and asked *"how much"* to which DONYA replied *"it's five (5) logs, like two thousand [\$2,000.00]"*. JORDAN replied *"I'm going to go ahead and do it."* DONYA and JORDAN then discussed meeting the following day after work.
93. On October 22, 2017 at approximately 8:38 pm, DONYA sent the following text message to DANTE: *"Im meeting im [JORDAN] when i get off"*

October 23, 2017

94. On October 23, 2017 at approximately 3:58 pm, DONYA sent the following text message to JORDAN: *"Yo"*
95. On October 23, 2017 at approximately 4:46 pm, JORDAN called DONYA and the two discussed meeting at Mondawmin Mall in two (2) hours.
96. On October 23, 2017 at approximately 6:22 pm, DANTE sent the following text message to DONYA: *"Just le me know when everything is done"*
97. On October 23, 2017 at approximately 6:55 pm, JORDAN called DONYA and they confirmed that they were meeting at Mondawmin Mall.

98. On October 23, 2017 at approximately 7:27 pm, DONYA called JORDAN and told him *"I'm here, I'm at umm Target."* JORDAN replied *"Alright, be there in two minutes."*
99. On October 23, 2017 at approximately 7:32 pm, JORDAN called DONYA and DONYA told JORDAN that she was in a silver Dodge Stratus. DONYA informed JORDAN that she flashed the headlights on her vehicle and JORDAN confirmed to DONYA that he saw the lights flash and that he was coming over to her.
100. On October 23, 2017 at approximately 7:30 pm, DONYA and JORDAN met in the parking lot of Mondawmin Mall, at which time, DONYA handed JORDAN a plastic white grocery bag from the trunk of her vehicle. JORDAN took the bag and placed it in the rear driver's side floorboard of his vehicle.
101. On October 23, 2017 at approximately 8:43 pm, DONYA sent the following text message to DANTE: *"Done"*
102. On October 23, 2017 at approximately 8:44 pm, JORDAN was arrested at 10367 Reisterstown Road, Owings Mills, Maryland 21117 and a lawful search and seizure warrant was executed on his vehicle. Recovered from the vehicle was approximately 4.5 grams of heroin, 147 strips of buprenorphine, approximately 58.80 grams of synthetic marijuana, a loaded Glock Model 23 handgun, a black Invicta wristwatch, a black ring, loose tobacco, loose tobacco cigarettes, a set of ear buds, two (2) BIC lighters, a smart watch with white band, a black Cricket Kyocera cellular telephone, two (2) black Long-CZ cellular telephones, a black Alcatel cellular telephone, a black LG ATT cellular telephone, a white Samsung Galaxy cellular telephone, a black Samsung flip-style telephone, a white Soyes smart cellular telephone, a black LG cellular telephone, a Cricket brand SIM card, a white SIM card, a lithium ion battery and a black cellular telephone

charger. All items the above noted items were wrapped with black electrical tape and condensed into in small packages. Also recovered from the front passenger seat of the vehicle was \$2,357.00 in US currency.

October 24, 2017

103. On October 24, 2017 at approximately 12:22 pm, DONYA called DANTE and told him that *“he [JORDAN] said don’t be rushing him to get it in there, it’s going to be slow....cause his people’s didn’t give him the okay. He said somebody just got knocked off...that’s why he got, that’s why he moving like he moving.”* During the call, DANTE and DONYA discussed the next package to be smuggled into JCI as well as a price for the bribe to be paid to JORDAN.

COUNT TWO

Possession with the Intent to Distribute - Heroin

The allegations contained in paragraphs 1-103 are re-alleged and incorporated herein as if set forth in full.

On or about October 17, 2017, in Anne Arundel County, Maryland, DONYA, DANTE, GAFFNEY, HALE and BOARD, did unlawfully possess a controlled dangerous substance of Schedule I, to wit: a small plastic baggie containing 4.5 grams of heroin, a narcotic drug, in sufficient quantity under all the circumstances to indicate reasonably an intent to distribute such controlled dangerous substance (CDS), 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 Article §5-602(2)
Penalty 20 years/\$15,000 ~
CJIS Code 1_1119*

COUNT THREE

Possession with the Intent to Distribute –Buprenorphine

The allegations contained in paragraphs 1-103 are re-alleged and incorporated herein as if set forth in full.

On or about October 17, 2017, in Anne Arundel County, Maryland, DONYA, DANTE, GAFFNEY, HALE and BOARD, did unlawfully possess a controlled dangerous substance of Schedule III, to wit: 8 strips of buprenorphine, 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 Article §5-602(2)
Penalty 5 years/\$15,000
CJIS Code 1_0233

COUNT FOUR

Possession with the Intent to Distribute –Synthetic Marijuana

The allegations contained in paragraphs 1-103 are re-alleged and incorporated herein as if set forth in full.

On or about October 17, 2017, in Anne Arundel County, Maryland, DONYA, DANTE, GAFFNEY, HALE and BOARD did unlawfully possess a controlled dangerous substance analog of Schedule I, to wit: 10 small plastic baggies weighing 58.80 grams of a green leafy substance, suspected synthetic marijuana, a Schedule I narcotic, 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 Article §5-602(2)

*Penalty 5 years/\$15,000
CJIS Code 1_0233*

COUNT FIVE

Possession – Heroin

The allegations contained in paragraphs 1-103 are re-alleged and incorporated herein as if set forth in full.

On or about October 17, 2017 in Anne Arundel County, Maryland, DONYA, DANTE, GAFFNEY, HALE and BOARD, did unlawfully possess a controlled dangerous substance of Schedule I, to wit: heroin, 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 1 year and/or \$15,000.00
CJIS Code 1_1111*

COUNT SIX

Possession – Buprenorphine

The allegations contained in paragraphs 1-103 are re-alleged and incorporated herein as if set forth in full.

On or about October 17, 2017 in Anne Arundel County, Maryland, DONYA, DANTE, GAFFNEY, HALE and BOARD, did unlawfully 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 1 year and/or \$15,000.00
CJIS Code 1_1111*

COUNT SEVEN

Contraband – Possession of a Telecommunication Device

The allegations contained in paragraphs 1-103 are re-alleged and incorporated herein as if set forth in full.

On or about September of 2017 through and including October of 2017, in Anne Arundel County, Maryland, HALE did knowingly possess a telecommunication device while detained in the Jessup Correctional Institution (JCI), a place of confinement located in Anne Arundel County, Maryland, where signs are posted that indicate such conduct is prohibited, in violation of §9-417(b)(4) of the Criminal Law Article of the Annotated Code of Maryland and against the peace, government and dignity of the State.

Criminal Law Article §9-417(b)(4)
Penalty 5 years/\$3,000
CJIS Code 1_1330

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Date Filed