

KOH  
LBG: USAO2022R00239

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

AVANTE DAQUAN LEE and  
DANIELLE DOMINIQUE SMITH,

Defendants

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CRIMINAL NO. 22-cr-00327-TDC

(Conspiracy to Distribute and Possess  
with Intent to Distribute a Controlled  
Substance, 21 U.S.C. § 846;  
Forfeiture, 21 U.S.C. § 853)

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INDICTMENT

USDC - GREENBELT  
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COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances)

The Grand Jury for the District of Maryland charges that:

Between on or about August 29, 2021, and on or about March 3, 2022, in the District of Maryland and elsewhere, the defendants,

AVANTE DAQUAN LEE and  
DANIELLE DOMINIQUE SMITH,

did knowingly combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to distribute and possess with the intent to distribute controlled substances, namely (i) a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance, and (ii) heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841.

21 U.S.C. § 846

**FORFEITURE ALLEGATION**

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 21 U.S.C. § 853 as a result of the defendants' convictions under Count One of this Indictment.

**Narcotics Forfeiture**

2. Upon conviction of the offense set forth in Count One of the Indictment, pursuant to 21 U.S.C. § 853(a), the defendants,

**AVANTE DAQUAN LEE and  
DANIELLE DOMINIQUE SMITH,**

shall forfeit to the United States (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of any such offense, and (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

**Substitute Assets**

3. If any of the property described above, as a result of any act or omission of any defendants,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be subdivided without difficulty,

the United States, pursuant to 21 U.S.C. § 853(p), shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above.

21 U.S.C. § 853

*Erek L. Barron* /LBG

Erek L. Barron  
United States Attorney

A TRUE BILL:

**SIGNATURE REDACTED**

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Steperson

Date: 15 SEPT 2022