



U.S. Department of Justice

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District of Maryland
Southern Division

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June 29, 2023

Robert Bonsib, Esq.
MarcusBonsib, LLC
6411 Ivy Lane
Suite 116
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FILED ENTERED
 LOGGED RECEIVED

JUL 11 2023

Re: United States v. Danielle Dominique Smith,
Criminal No. TDC-22-327

AT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY  DEPUTY

Dear Counsel:

This letter, together with the Sealed Supplement, confirms the plea agreement (this "Agreement") that has been offered to your client, Danielle Dominique Smith (hereinafter "Defendant"), by the United States Attorney's Office for the District of Maryland ("this Office"). If the Defendant accepts this offer, please have the Defendant execute it in the spaces provided below. **The Agreement is entered into and will be submitted to the Court pursuant to Federal Rule of Criminal Procedure 11(c)(1)(C).** If this offer has not been accepted by **July 7, 2023**, it will be deemed withdrawn. The terms of the Agreement are as follows:

Offense of Conviction

1. The Defendant agrees to waive indictment and plead guilty to Count One of a Superseding Information to be filed against the Defendant, which will charge the Defendant with Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance, in violation of 21 U.S.C. § 846. The Defendant admits that the Defendant is, in fact, guilty of this offense and will so advise the Court.

Elements of the Offense

2. The elements of the offense to which the Defendant has agreed to plead guilty, and which this Office would prove if the case went to trial, are as follows: That on or about the time alleged in the Superseding Information, in the District of Maryland and elsewhere: (1) the Defendant and one or more persons entered into the unlawful agreement charged in the Superseding Information, that is, an agreement to distribute and possess with intent to distribute buprenorphine (commonly known as suboxone), a Schedule III controlled substance; and (2) the Defendant knowingly and willfully became a member of that conspiracy.

Penalties

3. The maximum penalties provided by statute for the offense to which the Defendant is pleading guilty are as follows:

Count	Statute	Minimum Prison	Maximum Prison	Supervised Release	Maximum Fine	Special Assessment
1	21 U.S.C. §§ 846 and 841(b)(1)(E)	N/A	10 years	At least 2 years and no more than life	\$500,000	\$100

a. **Prison:** If the Court orders a term of imprisonment, the Bureau of Prisons has sole discretion to designate the institution at which it will be served.

b. **Supervised Release:** If the Court orders a term of supervised release, and the Defendant violates the conditions of supervised release, the Court may order the Defendant returned to custody to serve a term of imprisonment as permitted by statute, followed by an additional term of supervised release.

c. **Restitution:** The Court may order the Defendant to pay restitution pursuant to 18 U.S.C. §§ 3663, 3663A, and 3664.

d. **Payment:** If a fine or restitution is imposed, it shall be payable immediately, unless the Court orders otherwise under 18 U.S.C. § 3572(d). The Defendant may be required to pay interest if the fine is not paid when due.

e. **Forfeiture:** The Court may enter an order of forfeiture of assets directly traceable to the offense, substitute assets, and/or a money judgment equal to the value of the property subject to forfeiture.

f. **Collection of Debts:** If the Court imposes a fine or restitution, this Office's Financial Litigation Unit will be responsible for collecting the debt. If the Court establishes a schedule of payments, the Defendant agrees that: (1) the full amount of the fine or restitution is nonetheless due and owing immediately; (2) the schedule of payments is merely a minimum schedule of payments and not the only method, nor a limitation on the methods, available to the United States to enforce the judgment; and (3) the United States may fully employ all powers to collect on the total amount of the debt as provided by law. Until the debt is paid, the Defendant agrees to disclose all assets in which the Defendant has any interest or over which the Defendant exercises direct or indirect control. Until the money judgment is satisfied, the Defendant authorizes this Office to obtain a credit report in order to evaluate the Defendant's ability to pay, and to request and review the Defendant's federal and state income tax returns. The Defendant agrees to complete and sign a copy of IRS Form 8821 (relating to the voluntary disclosure of federal tax return information) and a financial statement in a form provided by this Office.

Waiver of Rights

4. The Defendant understands that by entering into this Agreement, the Defendant surrenders certain rights as outlined below:

a. If the Defendant had pled not guilty and persisted in that plea, the Defendant would have had the right to have a grand jury consider the charges in the Superseding Information against her. The Defendant would have had the right to a speedy jury trial with the close assistance of competent counsel. That trial could be conducted by a judge, without a jury, if the Defendant, this Office, and the Court all agreed.

b. If the Defendant elected a jury trial, the jury would be composed of twelve individuals selected from the community. Counsel and the Defendant would have the opportunity to challenge prospective jurors who demonstrated bias or who were otherwise unqualified, and would have the opportunity to strike a certain number of jurors peremptorily. All twelve jurors would have to agree unanimously before the Defendant could be found guilty of any count. The jury would be instructed that the Defendant was presumed to be innocent, and that presumption could be overcome only by proof beyond a reasonable doubt.

c. If the Defendant went to trial, the Government would have the burden of proving the Defendant guilty beyond a reasonable doubt. The Defendant would have the right to confront and cross-examine the Government's witnesses. The Defendant would not have to present any defense witnesses or evidence whatsoever. If the Defendant wanted to call witnesses in defense, however, the Defendant would have the subpoena power of the Court to compel the witnesses to attend.

d. The Defendant would have the right to testify in the Defendant's own defense if the Defendant so chose, and the Defendant would have the right to refuse to testify. If the Defendant chose not to testify, the Court could instruct the jury that they could not draw any adverse inference from the Defendant's decision not to testify.

e. If the Defendant were found guilty after a trial, the Defendant would have the right to appeal the verdict and the Court's pretrial and trial decisions on the admissibility of evidence to see if any errors were committed which would require a new trial or dismissal of the charges. By pleading guilty, the Defendant knowingly gives up the right to appeal the verdict and the Court's decisions.

f. By pleading guilty, the Defendant will be giving up all of these rights, except the right, under the limited circumstances set forth in the "Waiver of Appeal" paragraph below, to appeal the sentence. By pleading guilty, the Defendant understands that the Defendant may have to answer the Court's questions both about the rights being given up and about the facts of the case. Any statements that the Defendant makes during such a hearing would not be admissible against the Defendant during a trial except in a criminal proceeding for perjury or false statement.

g. If the Court accepts the Defendant's plea of guilty, the Defendant will be giving up the right to file and have the Court rule on pretrial motions, and there will be no further trial or proceeding of any kind in the above-referenced criminal case, and the Court will find the Defendant guilty.

h. By pleading guilty, the Defendant will also be giving up certain valuable civil rights and may be subject to deportation or other loss of immigration status, including possible denaturalization. The Defendant recognizes that if the Defendant is not a citizen of the United States, or is a naturalized citizen, pleading guilty may have consequences with respect to the Defendant's immigration status. Under federal law, conviction for a broad range of crimes can lead to adverse immigration consequences, including automatic removal from the United States. Removal and other immigration consequences are the subject of a separate proceeding, however, and the Defendant understands that no one, including the Defendant's attorney or the Court, can predict with certainty the effect of a conviction on immigration status. The Defendant is not relying on any promise or belief about the immigration consequences of pleading guilty. The Defendant nevertheless affirms that the Defendant wants to plead guilty regardless of any potential immigration consequences.

Advisory Sentencing Guidelines Apply

5. The Defendant understands that the Court will determine a sentencing guidelines range for this case (henceforth the "advisory guidelines range") pursuant to the Sentencing Reform Act of 1984 at 18 U.S.C. § 3551-3742 (excepting 18 U.S.C. § 3553(b)(1) and 3742(e)) and 28 U.S.C. §§ 991 through 998. The Defendant further understands that the Court will impose a sentence pursuant to the Sentencing Reform Act, as excised, and must take into account the advisory guidelines range in establishing a reasonable sentence.

Factual and Advisory Guidelines Stipulation

6. This Office and the Defendant stipulate and agree to the Statement of Facts set forth in Attachment A, which is incorporated by reference herein.

a. This Office and the Defendant further agree that the applicable base offense level is 6, pursuant to United States Sentencing Guidelines ("U.S.S.G.") §§ 2D1.1(a)(5) and (c)(17), because the quantity of controlled substances involved in the offense and foreseeable to the Defendant was equivalent to less than 1 kilogram of Converted Drug Weight (after application of the Drug Conversion Tables at U.S.S.G. § 2D1.1, Application Note 6 and 8(B) and (D), in that 1 gram of synthetic cannabinoid is equal to 167 grams of Converted Drug Weight and 1 unit of a Schedule III substance is equal to 1 gram of Converted Drug Weight).

b. A 2-level enhancement applies, pursuant to U.S.S.G. § 2D1.1(b)(4), because the offense was the distribution of a controlled substance in a prison, correctional facility, or detention facility.

c. A 2-level enhancement applies, pursuant to U.S.S.G. § 3B1.3, because the Defendant abused a position of public trust, or used a special skill, in a manner that significantly

facilitated the commission or concealment of the offense.

d. If the Defendant meets the criteria set forth in U.S.S.G. § 5C1.2(a)(1)-(5) (the “Safety Valve” provision), a 2-level downward adjustment will apply, pursuant to U.S.S.G. § 2D1.1(b)(18).

e. This Office does not oppose a 2-level reduction in the Defendant’s adjusted offense level pursuant to U.S.S.G. § 3E1.1(a) based upon the Defendant’s apparent prompt recognition and affirmative acceptance of personal responsibility for the Defendant’s criminal conduct. This Office may oppose any adjustment for acceptance of responsibility under U.S.S.G. § 3E1.1(a) if the Defendant: (i) fails to admit each and every item in the factual stipulation; (ii) denies involvement in the offense; (iii) gives conflicting statements about the Defendant’s involvement in the offense; (iv) is untruthful with the Court, this Office, or the United States Probation Office; (v) obstructs or attempts to obstruct justice prior to sentencing; (vi) engages in any criminal conduct between the date of this Agreement and the date of sentencing; (vii) attempts to withdraw the plea of guilty; or (viii) violates this Agreement in any way.

7. There is no agreement as to the Defendant’s criminal history and the Defendant understands that the Defendant’s criminal history could alter the Defendant’s offense level. Specifically, the Defendant understands that the Defendant’s criminal history could alter the final offense level if the Defendant is determined to be a career offender or if the instant offense was a part of a pattern of criminal conduct from which the Defendant derived a substantial portion of the Defendant’s income.

8. Other than as set forth above, no other offense characteristics, sentencing guidelines factors, potential departures or adjustments set forth in the United States Sentencing Guidelines are in dispute or will be raised in calculating the advisory guidelines range.

Rule 11 (c) (1) (C) Plea

9. The parties stipulate and agree pursuant to Federal Rule of Criminal Procedure 11(c)(1)(C) that a **term of imprisonment of six months of home detention**, pursuant to U.S.S.G. § 5C1.1(e)(3), is the appropriate disposition of this case taking into consideration the nature and circumstances of the offense, the Defendant’s criminal history, and all the other factors set forth in 18 U.S.C. § 3553(a).

10. This Agreement does not affect the Court’s discretion to impose any lawful term of supervised release or fine or to set any lawful conditions of probation or supervised release. In the event that the Court rejects this Agreement, except under the circumstances noted below, either party may elect to declare the Agreement null and void. Should the Defendant so elect, the Defendant will be afforded the opportunity to withdraw her plea pursuant to the provisions of Federal Rule of Criminal Procedure 11(c)(5). The parties agree that if the Court finds that the Defendant engaged in obstructive or unlawful behavior and/or failed to acknowledge personal responsibility as set forth herein, neither the Court nor the Government will be bound by the specific sentence contained in this Agreement, and the Defendant will not be able to withdraw her plea.

Obligations of the Parties

11. At the time of sentencing, this Office and the Defendant each will recommend a term of imprisonment of **six months of home detention**. This Office and the Defendant otherwise reserve the right to advocate for a reasonable sentence, period of supervised release, and/or fine considering any appropriate factors under 18 U.S.C. § 3553(a). This Office and the Defendant reserve the right to bring to the Court's attention all information with respect to the Defendant's background, character, and conduct that this Office or the Defendant deem relevant to sentencing.

Public Benefits in Drug Cases

12. The Defendant understands and acknowledges that under 21 U.S.C. §§ 862 and 862a, a person who has been convicted of a federal offense involving the distribution or possession of controlled substances may be denied certain federal and state benefits such as loans, grants, or food stamps.

Waiver of Appeal

13. In exchange for the concessions made by this Office and the Defendant in this Agreement, this Office and the Defendant waive their rights to appeal as follows:

a. The Defendant knowingly waives all right, pursuant to 28 U.S.C. § 1291 or any other statute or constitutional provision, to appeal the Defendant's conviction on any ground whatsoever. This includes a waiver of all right to appeal the Defendant's conviction on the ground that the statute(s) to which the Defendant is pleading guilty is unconstitutional, or on the ground that the admitted conduct does not fall within the scope of the statute(s), to the extent that such challenges legally can be waived.

b. If the Court imposes the agreed-upon term of imprisonment, the Defendant and this Office knowingly and expressly waive all rights conferred by 18 U.S.C. § 3742 to appeal whatever sentence is imposed (including any term of imprisonment, fine, term of supervised release, or order of restitution) for any reason (including the establishment of the advisory sentencing guidelines range, the determination of the Defendant's criminal history, the weighing of the sentencing factors, and any constitutional challenges to the calculation and imposition of any term of imprisonment, fine, order of forfeiture, order of restitution, and term or condition of supervised release).

c. The Defendant waives any and all rights under the Freedom of Information Act relating to the investigation and prosecution of the above-captioned matter and agrees not to file any request for documents from this Office or any investigating agency.

Forfeiture

13. The Defendant understands that the Court may enter an Order of Forfeiture as part of the Defendant's sentence, and that the Order of Forfeiture may include assets directly traceable to the offense(s), substitute assets, and/or a money judgment equal to the value of the property derived from, or otherwise involved in, the offenses.

14. Specifically, but without limitation on the Government's right to forfeit all property subject to forfeiture as permitted by law, the Defendant agrees to forfeit to the United States all of the Defendant's right, title, and interest, if any, in items that constitute money, property, and/or assets derived from or obtained by the Defendant and/or co-conspirators as a result of, or used to facilitate the commission of, the Defendant's and co-conspirators' illegal activities.

15. The Defendant agrees to consent to the entry of orders of forfeiture for the property described herein and waives the requirements of Federal Rules of Criminal Procedure 32.2 and 43(a) regarding notice of the forfeiture in the charging instrument, announcement of the forfeiture at sentencing, and incorporation of the forfeiture in the judgment.

16. The Defendant agrees to assist fully in the forfeiture of the above property. The Defendant agrees to disclose all assets and sources of income, to consent to all requests for access to information related to assets and income, and to take all steps necessary to pass clear title to the forfeited assets to the United States, including executing all documents necessary to transfer such title, assisting in bringing any assets located outside of the United States within the jurisdiction of the United States, and taking whatever steps are necessary to ensure that assets subject to forfeiture are made available for forfeiture.

17. The Defendant waives all challenges to any forfeiture carried out in accordance with this Agreement on any grounds, including any and all constitutional, legal, equitable, statutory, or administrative grounds brought by any means, including through direct appeal, habeas corpus petition, or civil complaint. The Defendant will not challenge or seek review of any civil or administrative forfeiture of any property subject to forfeiture under this Agreement, and will not assist any third party with any challenge or review or any petition for remission of forfeiture.

Defendant's Conduct Prior to Sentencing and Breach

18. Between now and the date of the sentencing, the Defendant will not engage in conduct that constitutes obstruction of justice under U.S.S.G. § 3C1.1; will not violate any federal, state, or local law; will acknowledge guilt to the probation officer and the Court; will be truthful in any statement to the Court, this Office, law enforcement agents, and probation officers; will cooperate in the preparation of the presentence report; and will not move to withdraw from the plea of guilty or from this Agreement.

19. If the Defendant engages in conduct prior to sentencing that violates the above paragraph of this Agreement, and the Court finds a violation by a preponderance of the evidence, then: (i) this Office will be free from its obligations under this Agreement; (ii) this Office may make sentencing arguments and recommendations different from those set out in this Agreement,

even if the Agreement was reached pursuant to Rule 11(c)(1)(C); and (iii) in any criminal or civil proceeding, this Office will be free to use against the Defendant all statements made by the Defendant and any of the information or materials provided by the Defendant, including statements, information, and materials provided pursuant to this Agreement, and statements made during proceedings before the Court pursuant to Rule 11 of the Federal Rules of Criminal Procedure. A determination that this Office is released from its obligations under this Agreement will not permit the Defendant to withdraw the guilty plea. The Defendant acknowledges that the Defendant may not withdraw the Defendant's guilty plea—even if made pursuant to Rule 11(c)(1)(C)—if the Court finds that the Defendant breached the Agreement. In that event, neither the Court nor the Government will be bound by the specific sentence or sentencing range agreed and stipulated to herein pursuant to Rule 11(c)(1)(C).


Entire Agreement

20. This letter, together with the Sealed Supplement, constitutes the complete plea agreement in this case. This letter, together with the Sealed Supplement, supersedes any prior understandings, promises, or conditions between this Office and the Defendant. There are no other agreements, promises, undertakings, or understandings between the Defendant and this Office other than those set forth in this letter and the Sealed Supplement. No changes to this Agreement will be effective unless in writing, signed by all parties and approved by the Court.

If the Defendant fully accepts each and every term and condition of this Agreement, please sign and have the Defendant sign the original and return it to me promptly.

Very truly yours,

Erek L. Barron
United States Attorney

 Digitally signed by
LEAH GROSSI
Date: 2023.06.29
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LBG

Leah B. Grossi
Assistant United States Attorney

I have read this Agreement, including the Sealed Supplement, and carefully reviewed every part of it with my attorney. I understand it and I voluntarily agree to it. Specifically, I have reviewed the Factual and Advisory Guidelines Stipulation with my attorney and I do not wish to change any part of it. I am completely satisfied with the representation of my attorney.


7-9-2023
Date


Danielle Dominique Smith

I am the Defendant's attorney. I have carefully reviewed every part of this Agreement, including the Sealed Supplement with the Defendant. The Defendant advises me that the

Defendant understands and accepts its terms. To my knowledge, the Defendant's decision to enter into this Agreement is an informed and voluntary one.

7-9-2023
Date


Robert Bonsib, Esq.

FILED _____ ENTERED _____
 LOGGED _____ RECEIVED _____

JUL 11 2023

ATTACHMENT A

STIPULATION OF FACTS

AT GREENBELT
 CLERK, U.S. DISTRICT COURT
 DISTRICT OF MARYLAND
 BY _____ DEPUTY

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

From approximately November 23, 2009, through April 15, 2022, the Defendant, **DANIELLE DOMINIQUE SMITH** (“**SMITH**”), was employed as a correctional officer at the Prince George’s County Department of Corrections detention facility, located at 13400 Dille Drive, Upper Marlboro, Prince George’s County, Maryland 20772 (“**PGDOC**”). During **SMITH**’s employment at **PGDOC**, **SMITH** developed a romantic and sexual relationship with **Avante Daquan Lee** (“**Lee**”), an inmate at **PGDOC**. **SMITH** and **Lee** discussed their relationship on recorded jail calls starting on at least June 3, 2021, and continuing until March 2, 2022.

Between approximately August 29, 2021, and March 2, 2022, **SMITH** and **Lee**, knowingly and willfully conspired with each other, and other coconspirators, to distribute and possess with intent to distribute buprenorphine (commonly known as Suboxone), a Schedule III controlled substance, as well as N-(1-Amino-3,3-dimethyl-1-oxobutan-2-yl)-1-butyl-1H-indazole-3-carboxamide (ADB-BUTINACA) (commonly known as K2), a synthetic cannabinoid and a Schedule I controlled substance as defined in 18 U.S.C. § 802(32) (collectively the “Controlled Substances”). **SMITH** and **Lee** knew that these Controlled Substances were intended for human consumption.

During the course of the conspiracy, **SMITH** would obtain the Controlled Substances from coconspirators and then smuggle those Controlled Substances into **PGDOC**. Once inside **PGDOC**, **SMITH** would conceal the Controlled Substances on special diet food trays that were specifically designated for **Lee**. **Lee** would then receive the special diet food trays with the Controlled Substances and distribute the Controlled Substances to other inmates within **PGDOC**. Other inmates, or relatives and friends of other inmates, would then send **SMITH** money for the Controlled Substances, including through her CashApp account.

SMITH and **Lee** would talk to each other about the Controlled Substances on recorded jail calls and would refer to the Controlled Substances as food products, including broccoli, vegetables, and chicken strips. A few examples are listed below:

- On an August 31, 2021 recorded jail call, **SMITH** and **Lee** discussed “broccoli” and **SMITH** stated that she will “smoke it.” **Lee** stated that it would smell like “ass cheeks”, and **SMITH** told **Lee** to tell “him” not to put it in their butt cheeks.
- On a December 7, 2021 recorded jail call, **SMITH** asked **Lee** about the “vegetables” on **Lee**’s tray. **Lee** replied that they were “good.” Later in the conversation, **Lee** told **SMITH**, “I wish I had some more vegetables baby” to which **SMITH** replied, “I’m sure you do baby” and laughed.

- On a January 17, 2022 recorded jail call, Lee told SMITH that she would get paid \$5,000 if SMITH obtained the “chicken strips.” SMITH asked Lee what SMITH would do with the “chicken strips.” Lee told SMITH to “put them in saran wrap, when cockeyed and ugly ass are working.” SMITH asked if Lee was “trying to be funny, do you know where you’re at?” Lee reminded SMITH that they don’t check the “trays.”

On September 24, 2021, PGDOC Special Investigations and Intelligence Section (“PGDOC SIIS”), pursuant to PGDOC’s Policy and Procedure Manual, conducted a targeted cell search of Lee’s PGDOC cell for suspected contraband. During the search, PGDOC SIIS found and seized a white paper of suspected controlled substances, which weighed approximately 0.280 grams, that SMITH had smuggled into PGDOC for Lee. The U.S. Department of Justice, Drug Enforcement Administration, Mid-Atlantic Laboratory (the “DEA Lab”) later tested 9 of the 35 units of the seized paper and determined those units contained a mixture and substance containing a detectable amount of N-(1-Amino-3,3-dimethyl-1-oxobutan-2-yl)-1-butyl-1H-indazole-3-carboxamide (ADB-BUTINACA) (commonly known as K2).

On February 16, 2022, PGDOC SIIS, pursuant to PGDOC’s Policy and Procedure Manual, conducted a targeted cell search of another PGDOC inmate (“Coconspirator 1”) for suspected contraband. During the search, PGDOC SIIS found a plastic bottle containing approximately 395 strips of suspected controlled substances that SMITH had smuggled into PGDOC for Lee and Lee had later distributed to Coconspirator 1. The DEA Lab later tested nine of the 395 units and determined those units to contain a mixture and substance containing a detectable amount of buprenorphine (commonly known as Suboxone).

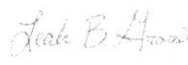

Two days after the targeted cell search of Coconspirator 1, on February 18, 2022, in a recorded jail call, SMITH told Lee that Coconspirator 1 was a “fucking idiot,” that Coconspirator 1 was “caught with everything,” that Coconspirator 1 attempted to “swallow” some of the contraband, and that she was not sure how PGDOC SIIS found it. In response, Lee told SMITH, “I . . . ain’t got nothing to worry about” and then corrected that statement and stated, “we ain’t got nothing to worry about!”

At the end of February 2022, SMITH took pre-approved scheduled leave from work with PGDOC for approximately two weeks, with a return date of March 2, 2022. While on leave, SMITH and Lee continued to talk to one another on jail calls.


On a March 2, 2022 recorded jail call, Lee asked if SMITH was bringing the “meals”, and SMITH stated she was. Since PGDOC was concerned that SMITH was going to smuggle in additional controlled substances, PGDOC administratively suspended SMITH as soon as she arrived to work that same day.

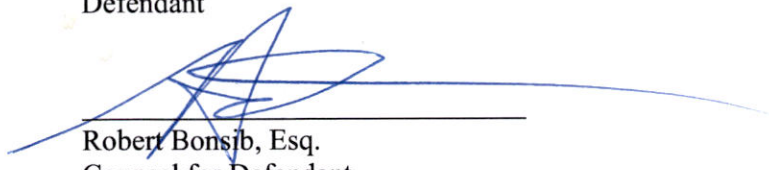
The quantity of Controlled Substances involved in the conspiracy and foreseeable to **SMITH** was equivalent to less than one kilogram of Converted Drug Weight (after application of the Drug Conversion Tables at U.S.S.G. § 2D1.1, Application Notes 8(A) and (D)).

SO STIPULATED:

 Digitally signed
by LEAH GROSSI 
Date: 2023.06.29
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Leah B. Grossi
Assistant United States Attorney


Danielle Dominique Smith
Defendant


Robert Bonsib, Esq.
Counsel for Defendant