UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

v.

Case: 2:24-cr-20514
Assigned To : Edmunds, Nancy G.
Referral Judge: Grand, David R.
Assign. Date : 9/18/2024
Description: IND USA V ORLANDO MADDOX ET AL (SS)

D-1 ORLANDO MADDOX,
D-2 ISSAC THOMAS,
D-3 ANDRE MADDOX,
D-4 RALPH THOMAS, and
D-5 ANGELA LEWIS,

Defendants.
_____/

Violations:
21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
18 U.S.C. § 924(c)
18 U.S.C. § 1956(h)

Indictment

The Grand Jury charges that:

Count One
Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance
21 U.S.C. §§ 846 & 841(a)(1)

D-1 ORLANDO MADDOX
D-2 ISSAC THOMAS
D-3 ANDRE MADDOX
D-4 RALPH THOMAS

From in or around February 2023, through in or around May 2024, in the Eastern District of Michigan, and elsewhere, the defendants, ORLANDO MADDOX, ISSAC THOMAS, ANDRE MADDOX, and RALPH THOMAS, knowingly and intentionally

combined, conspired, confederated, and agreed with each other and with persons known and unknown to the Grand Jury, to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

With respect to the defendant, ORLANDO MADDOX, the controlled substances involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, are 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), in violation of Title 21, United States Code, Section 841(b)(1)(A)(vi), 500 grams or more of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B)(ii)(II), and 100 grams or more of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B)(i).

With respect to the defendant, ISSAC THOMAS, the controlled substance involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of a mixture and substance

containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), in violation of Title 21, United States Code, Section 841(b)(1)(A)(vi).

With respect to the defendant, ANDRE MADDOX, the controlled substance involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), in violation of Title 21, United States Code, Section 841(b)(1)(A)(vi), and 100 grams or more of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B)(i).

With respect to the defendant, RALPH THOMAS, the controlled substances involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, are 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), in violation of Title 21, United States Code, Section 841(b)(1)(B)(vi), 500 grams or more of a

mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B)(ii)(II), and 100 grams or more of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B)(i).

Count Two
Possession of Fentanyl with Intent to Distribute
21 U.S.C. § 841(a)(1)

D-1 ORLANDO MADDOX
D-2 ISSAC THOMAS
D-3 ANDRE MADDOX

On or about May 10, 2024, in the Eastern District of Michigan, the defendants, ORLANDO MADDOX, ISSAC THOMAS, and ANDRE MADDOX, knowingly and intentionally possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the controlled substance involved was 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), in violation of Title 21, United States Code, Section 841(b)(1)(A)(vi).

Count Three
Possession of a Firearm in Furtherance of a Drug-Trafficking Crime
18 U.S.C. § 924(c)(1)(A)

D-1 ORLANDO MADDOX

On or about May 10, 2024, in the Eastern District of Michigan, the defendant, ORLANDO MADDOX, knowingly possessed a firearm, that is, a Smith and Wesson 5.7x28 handgun, SN: PJJ896; a Smith & Wesson 1911 .45 caliber pistol, SN: UCW5975; and a Glock 19 9mm caliber pistol, SN: ZDA457, in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to possess with intent to distribute a controlled substance, as charged in Count One of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A).

Count Four
Possession of a Firearm in Furtherance of a Drug-Trafficking Crime
18 U.S.C. § 924(c)(1)(A)

D-3 ANDRE MADDOX

On or about May 10, 2024, in the Eastern District of Michigan, the defendant, ANDRE MADDOX, knowingly possessed a firearm, that is, a Taurus 45/410 The Judge Ultra-Lite .45LC/.410SS Revolver, SN:

C0756220, in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to possess with intent to distribute a controlled substance, as charged in Count One of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A).

Count Five
Possession of a Firearm by a Convicted Felon
18 U.S.C. § 922(g)(1)

D-1 ORLANDO MADDOX

On or about May 10, 2024, in the Eastern District of Michigan, the defendant, ORLANDO MADDOX, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate and foreign commerce, a firearm, that is, a Smith and Wesson 5.7x28 handgun, SN: PJJ896; a Smith & Wesson 1911 .45 caliber pistol, SN: UCW5975; a Glock 19 9mm caliber pistol, SN: ZDA457; a BC Defense SQS .556 caliber AR-15 style rifle, SN: BCI04137; and a Western Field XNH-565-C 12-gauge shotgun, no visible serial number, in violation of Title 18, United States Code, Section 922(g)(1).

Count Six
Possession of a Firearm by a Convicted Felon
18 U.S.C. § 922(g)(1)

D-3 ANDRE MADDOX

On or about May 10, 2024, in the Eastern District of Michigan, the defendant, ANDRE MADDOX, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate and foreign commerce, a firearm, that is, a Taurus 45/410 The Judge Ultra-Lite .45LC/.410SS Revolver, SN: C0756220, in violation of Title 18, United States Code, Section 922(g)(1).

Count Seven
Conspiracy to Launder Monetary Instruments
18 U.S.C. § 1956(h) & 1956(a)(1)(B)(i)

D-1 ORLANDO MADDOX
D-5 ANGELA LEWIS

From in or around March 2023, through February 2024, in the Eastern District of Michigan, and elsewhere, the defendants, ORLANDO MADDOX and ANGELA LEWIS, did knowingly, conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved

the proceeds of specified unlawful activity, that is, conspiracy to distribute controlled substances, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and knowing, while conducting and attempting to conduct such financial transactions, that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Forfeiture Allegations
21 U.S.C. § 853; 18 U.S.C. § 924(d)
with 28 U.S.C. § 2461; and 18 U.S.C. § 982(a)(1)

The allegations contained in Counts One through Seven of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a), Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461, and Title 18, United States Code, Sections 982(a)(1).

Upon conviction of a controlled substance violation of Title 21, United States Code, Sections 841 and/or 846, as alleged in Counts One

and Two of this Indictment, the defendant(s) shall forfeit to the United States, pursuant to 21 United States Code, Section 853(a): (1) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violations; and (2) any property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation. The property to be forfeited includes, but is not limited to, the following:

22612 Cherry Hill St., Dearborn, Michigan 48124, Wayne County:

- One (1) AR style rifle (BC Defense SQS .556 caliber rifle, SN: BCI04137)
- One (1) Smith & Wesson 1911 .45 caliber pistol, SN: UCW5975
- One (1) Glock 19 9mm caliber, SN: ZDA457
- One (1) Shotgun (Western Field XNH-565-C 12-gauge shotgun, no visible serial number)
- Three (3) Luxury watches (Franck Muller Conquistador Watch, 8005KSC; Rolex watch, no visible serial number; Audemars Piguet watch, SN: E96854
- $2,304.00 USC seized from O. Maddox

22036 Kessler St., Detroit, Michigan 48219, Wayne County:

- One (1) Pistol (Taurus 45/410 The Judge Ultra-Lite .45LC/.410SS Revolver, SN: C0756220)

7700 Dacosta St., Detroit, Michigan 48239, Wayne County:

- $9,000 US currency
- One (1) Ruger American Pistol, SN: 861-58929
  One (1) Beretta 92A1 9mm pistol, SN: K80463Z

Upon conviction of the firearm offenses charged in Counts Three, Four, Five, or Six of this Indictment, in violation of Title 18, United States Code, Section 924(c) or Section 922, defendants shall forfeit to the United States any firearm and ammunition involved in said offense, pursuant to Title 18, United States Code, Section 924(d)(1) together with Title 28, United States Code, Section 2461, including but not limited to:

22612 Cherry Hill St., Dearborn, Michigan 48124, Wayne County:

- One (1) AR style rifle (BC Defense SQS .556 caliber rile, SN: BCI04137)
- One (1) Smith & Wesson 1911 .45 caliber pistol, SN: UCW5975
- One (1) Glock 19 9mm caliber, SN: ZDA457
- One (1) Shotgun (Western Field XNH-565-C 12-gauge shotgun, no visible serial number)

22036 Kessler St., Detroit, Michigan 48219, Wayne County:

- One (1) Pistol (Taurus 45/410 The Judge Ultra-Lite .45LC/.410SS Revolver, SN: C0756220)

7700 Dacosta St., Detroit, Michigan 48239, Wayne County:

- One (1) Ruger American Pistol, SN: 861-58929
- One (1) Beretta 92A1 9mm pistol, SN: K80463Z

Upon conviction of the money laundering offense charged in Count Seven, in violation of Title 18, United States Code, Section 1956(h) and 1956(a)(1)(B)(i), the defendants, ORLANDO MADDOX and ANGELA LEWIS, shall forfeit to the United States any property, real or personal, involved in such offense, and any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

Forfeiture Money Judgment: Such property also includes, but is not limited to, a forfeiture money judgment against the defendants in an amount to be determined, representing the total value of all property subject to forfeiture, as described herein.

Substitute Assets: If any of the property described above, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under Title 21, United States Code, Section 853(p).

This is a True Bill.

/s/ Grand Jury Foreperson
Grand Jury Foreperson

DAWN N. ISON
United States Attorney

/s/ Benjamin Coats
Benjamin Coats
Chief, Drug Task Force Unit

/s/ Jason Dorval Norwood
Jason Dorval Norwood
Assistant United States Attorney

Dated: September 18, 2024

United States District Court Eastern District of Michigan	**Criminal Case Cov**

Case: 2:24-cr-20514
Assigned To : Edmunds, Nancy G.
Referral Judge: Grand, David R.
Assign. Date : 9/18/2024
Description: IND USA V ORLANDO MADDOX ET AL (SS)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	**Companion Case Number:**
This may be a companion case based upon **LCrR 57.10 (b)(4)**[1]**:**	**Judge Assigned:**
☐ **Yes** ☒ **No**	**AUSA's Initials:**

Case Title: USA v. Orlando Maddox et al

County where offense occurred : Wayne

Check One: ☒**Felony** ☐**Misdemeanor** ☐**Petty**

✓ Indictment/____Information --- **no** prior complaint.
____Indictment/____Information --- based upon prior complaint [**Case number:**]
____Indictment/____Information --- based upon **LCrR 57.10 (d)** ***[Complete Superseding section below]***.

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name	**Charges**	**Prior Complaint (if applicable)**

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

September 18, 2024
Date

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[1] Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.