

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case:2:17-cr-20432
Judge: Roberts, Victoria A.
MJ: Stafford, Elizabeth A.
Filed: 06-27-2017 At 04:25 PM
SEALED MATTER (LG)

v.

D-1 ALEX KAFI
D-2 CHERYL OZOH
D-3 DANIELLE SMITH

VIO:
21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
21 U.S.C. § 853

Defendant.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

21 U.S.C. § 846 and 841(a)(1)
Conspiracy to Distribute Controlled Substances

**D-1 ALEX KAFI
D-2 CHERYL OZOH
D-3 DANIELLE SMITH**

1. From in or around 2013 until in or around May of 2017 in the Eastern District of Michigan, and elsewhere, the defendants, ALEX KAFI, CHERYL OZOH, and DANIELLE SMITH, and others, knowingly, intentionally, and unlawfully combined, conspired, confederated, and agreed with each other, and others known and unknown to the Grand Jury, to knowingly, intentionally, and

unlawfully distribute Schedule II controlled substances, including, but not limited to, oxycodone hydrochloride.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

FORFEITURE ALLEGATIONS

(21 U.S.C. § 853)

2. The above allegations contained in this Indictment are hereby incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

3. As a result of the foregoing violations of Title 21, United States Code, Sections 841(a)(1) and 846, as charged in Count 1 of this Indictment, the defendants, ALEX KAFI, CHERYL OZOH, and DANIELLE SMITH shall forfeit to the United States: (a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violations; and (b) any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations.

4. Upon conviction, the United States will request that a forfeiture money judgment be imposed against each convicted defendant in an amount that represents the total amount of proceeds that the convicted defendant obtained as a result of the aforementioned offenses, and/or in the amount involved in the convicted defendant's

violations of Title 21, United States Code, Sections 841(a)(1) and 846, as charged in Count 1 of this Indictment.

5. Pursuant to Title 21, United States Code, Section 853(p), the defendants, ALEX KAFI, CHERYL OZOH, and DANIELLE SMITH, shall forfeit substitute property, up to the value of the property described above or identified in any subsequent forfeiture bills of particular, if, by any act or omission of the defendant(s), the property cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property that cannot be subdivided without difficulty.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
Grand Jury Foreperson

DANIEL L. LEMISCH
ACTING U.S. ATTORNEY

s/Wayne F. Pratt

WAYNE F. PRATT
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Assistant United States Attorney
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s/Allan J. Medina

ALLAN J. MEDINA
Assistant Chief
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s/Steven Scott

STEVEN SCOTT
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s/Malisa Dubal

MALISA DUBAL
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U.S. Department of Justice
Criminal Division, Fraud Section
1400 New York Avenue, N.W.
Washington, DC 20005

Date: June 27, 2017

ORIGINAL

United States District Court Eastern District of Michigan	Criminal Case Cov
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to com

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>SS</i>

Case Title: USA v. Alex Kafi, et al.

County where offense occurred : Wayne County

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:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 27, 2017
Date


 Steven Scott, Trial Attorney
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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.