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AO 91 (Rev. 11/11) Criminal Complaint

AUSA: John O'Brien  
Special Agent: Jeffrey Jacobs, FBI

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America  
v.  
D-1 Anthony Knight,  
D-2 Henry Thomas, and  
D-3 Marlon Jackson

Case: 2:19-mj-30261  
Judge: Unassigned,  
Filed: 05-14-2019  
IN RE: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 11, 2019, in the county of Macomb in the Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 846	Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances.

This criminal complaint is based on these facts:

See Attached Affidavit.

Continued on the attached sheet.

  
Complainant's signature  
Jeffrey Jacobs, Special Agent, FBI  
Printed name and title

Sworn to before me and signed in my presence.

Date: May 14, 2019

  
Judge's signature  
Elizabeth A. Stafford, U.S. Magistrate Judge  
Printed name and title

City and state: Detroit, MI

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Jeffrey Jacobs, being duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such. I have been employed as a Special Agent since January 2005 and am currently assigned to the FBI Oakland County Gang and Violent Crime Task Force. I have conducted and participated in numerous criminal investigation including bank robberies, violent crimes, extortionate extensions of credit, carjacking, gang related shootings, interstate theft, and narcotics trafficking.

2. The statements contained in this Affidavit are based in part on information provided by other Special Agents and/or local law enforcement officers, witnesses, my observations, and my experience. I have not included all the facts known about the case, but only those necessary to establish probable cause.

3. The FBI Oakland County Gang and Violent Crime Task Force (OCGVCTF) is investigating a multi-state narcotics trafficking network or drug trafficking organization (hereafter DTO) with significant longtime operations based in the Pontiac/Oakland County area. The DTO also has operations in Huntington, West Virginia, and elsewhere. Information and evidence developed

during the investigation has revealed that the DTO transports and sells heroin, fentanyl, cocaine, and crystal meth.

4. The investigation has also revealed that the source of the heroin, fentanyl, cocaine, and crystal meth supply comes from Mexico by way of Phoenix, Arizona. The investigation has identified NEIL THOMAS, ANTHONY KNIGHT, HENRY THOMAS, and MARLON JACKSON, as DTO members.

5. On April 10, 2018, JACKSON was observed taking out the trash at 1541 Root St., Flint, Michigan. Members of the FBI-OCGVCTF subsequently conducted a trash search and multiple kilo-sized wrappers were found that later tested positive for fentanyl.

6. The investigation has also revealed that the DTO uses the United States Postal Service (USPS) and other methods to transport narcotics. In the course of the investigation, law enforcement officers seized 2.5–3 kilograms of cocaine on February 11, 2019, shipped from Phoenix, Arizona, to Pontiac, Michigan, and 4 kilograms of confirmed fentanyl and cocaine on March 26, 2019, shipped from Phoenix, Arizona, to Clinton Township, Michigan.

7. The February 11, 2019 seized package was intended to be delivered to JACKSON's residence, 1153 Maurer Ave., Pontiac, Michigan

8. You affiant is aware, because of information obtained during the course of this investigation, that in early February, the DTO acquired a quantity of

lesser-quality narcotics that led to customer complaints. Specifically, your affiant is aware that NEIL THOMAS had a conversation in early February with HENRY THOMAS and during the conversation, NEIL THOMAS asked, "What did you do with that stuff? You just set it to the side?" HENRY THOMAS replied, "Yes. Nobody wants it." NEIL THOMAS informed HENRY THOMAS that there were few people moving it, you just have to give them a break. NEIL THOMAS instructed HENRY THOMAS to not just leave it alone. HENRY THOMAS replied that he already gave a break and has "sold like 300." Later in the conversation, HENRY THOMAS states he can sell it for \$50 or \$40 a gram to get rid of it.

9. In the same conversation, HENRY THOMAS also states, "I got all the money in a bag. I ain't even touched it." NEIL THOMAS replies, "We'll count it when I get there" and he will be fair with HENRY THOMAS. Based on your Affiant's participation in this investigation and context of the conversation, it is believed the bag of money HENRY THOMAS refers to is narcotics proceeds.

10. Your affiant is aware, as a result of information obtained during the course of this investigation, that in early February 2019, NEIL THOMAS had a conversation with his son, KNIGHT, and during that conversation NEIL THOMAS advised the "shit" is lost somewhere, but it reads normal – meaning USPS shows the package still on track to be delivered. NEIL THOMAS further advised we have just been here waiting for them (USPS) to drop them off, but

nothing came yet. KNIGHT then asked if it was the “girl” and THOMAS replies, yes, the “hooker.” Based on my training and experience in this investigation, I know that “girl” and “hooker” are terms commonly used in connection with drug trafficking to refer to cocaine. Based upon the references in the conversation and my personal knowledge of the investigation, it is clear that THOMAS is referring to the February 11, 2019 seized package, which contained cocaine.

11. In the same conversation, NEIL THOMAS informed KNIGHT that he has plenty of that “other shit” at the house over there with JACKSON. KNIGHT inquires how many, and NEIL THOMAS advises he used two, so there are about four of them over there. NEIL THOMAS states he is going to be getting his money back for them, so he instructs KNIGHT to sell it at a discount. KNIGHT states he is going to grab some of them. KNIGHT then asks NEIL THOMAS if he knows the whereabouts of JACKSON. In response, NEIL THOMAS advises that JACKSON is over there waiting on the thing, which your affiant believes is the February 11, 2019 seized package. Your affiant believes the “other shit” that NEIL THOMAS and KNIGHT are discussing is the lesser quality narcotics discussed above.

12. Later in the same conversation, NEIL THOMAS advises that he sent HENRY five to seven of them and HENRY is selling it. Your affiant believes

NEIL THOMAS and HENRY are discussing the lesser-quality narcotics obtained by DTO in February 2019.

13. Your affiant is further aware, because of information obtained during the course of this investigation, that in mid-February 2019, JACKSON informed KNIGHT that he could not do something, because he had to wait on the mail. It is believed that JACKSON is waiting at his residence for the February 11, 2019 seized shipment, described above, which contained approximately 2 ½ - 3 kilos of confirmed cocaine.


14. Your affiant is further aware, because of information obtained during the course of this investigation that in mid-March, NEIL THOMAS instructed HENRY THOMAS to tell KNIGHT that he needs the “stuff” he (KNIGHT) has. HENRY then informs KNIGHT that NEIL THOMAS wants him (KNIGHT) to get the “stuff.” KNIGHT advises that HENRY THOMAS can give it to NEIL THOMAS, because it is at HENRY’s location. Based on your affiant’s participation in this investigation, and the context of this call, I know “stuff” refers to narcotics.

15. ANTHONY KNIGHT has previous felony convictions in the State of Michigan for Criminal Sexual Conduct- 3rd Degree (2004) and federal felony conviction for Narcotics/Sell/Distribute/Or Dispense (2011).

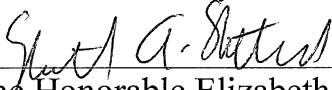
16. HENRY THOMAS has previous felony convictions in the State of Michigan for Controlled Substance-Possess (cocaine, heroin or another narcotic) less than 25 grams (2005), two counts of Controlled Substance Delivery/Manufacturing (cocaine, heroin or another narcotic) less than 50 grams (2006), and Child Support-Failing to Pay (2011).

17. MARLON JACKSON has previous felony convictions in the State of Michigan for Armed Robbery and Weapons Felony Firearm (1977), two counts Heroin, Sell/Manufacture (1981), Larceny From Building (1983), Controlled Substance-Possess (cocaine, heroin or another narcotic) less than 25 grams, Felony Habitual Offender- Fourth Offense Notice (1992).

18. Based on the above information, there is probable cause to believe that ANTHONY KNIGHT, HENRY THOMAS and MARLON JACKSON have violated Title 21, United States Code, Section 846, Conspiracy to Possess with the Intent to Distribute and to Distribute Controlled Substances.

  
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Special Agent Jeff Jacobs  
FBI Oakland County Violent Gang Task Force

Sworn to before me and signed in my presence  
on the 14th of May, 2019.

  
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The Honorable Elizabeth Stafford  
United States Magistrate Judge