

★ MAY 23 2022 ★

LONG ISLAND OFFICE

CCC:MRM  
F. # 2021R00870 / OCDEF # NY-NYE-836

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

MARQUIS DOUGLAS,  
also known as "Prince" and  
"President," and  
JESSE PACE,  
also known as "Jah,"

Defendants.

----- X

THE GRAND JURY CHARGES:

INDICTMENT

Cr. No. **CR 22 246**

(T. 21, U.S.C., §§ 841(a)(1),  
841(b)(1)(A)(i), 841(b)(1)(A)(ii)(II),  
841(b)(1)(A)(iii), 841(b)(1)(B)(vi),  
841(b)(1)(C), 846, 853(a) and 853(p);  
T. 18, U.S.C., §§ 2 and 3551 et seq.)

**AZRACK, J.**

**TISCIONE, M.J.**

COUNT ONE

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

1. In or about and between January 2015 and the date of this Indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MARQUIS DOUGLAS, also known as "Prince" and "President," and JESSE PACE, also known as "Jah," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing cocaine, a Schedule II controlled substance; (b) a substance containing cocaine base, a Schedule II controlled substance; (c) a substance containing heroin, a Schedule I controlled substance; (d) a substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance; and (e) a substance containing an analogue of fentanyl, to wit: fluorofentanyl, a Schedule I controlled substance,

contrary to Title 21, United States Code, Section 841(a)(1). The amount of cocaine, cocaine base, heroin and fentanyl involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, were (a) five kilograms or more of a substance containing cocaine; (b) 280 grams or more of a substance containing cocaine base; (c) one kilogram or more of a substance containing heroin; and (d) 40 grams or more of a substance containing fentanyl.

(Title 21, United States Code, Sections 846, 841(b)(1)(A)(i), 841(b)(1)(A)(ii)(II), 841(b)(1)(A)(iii), 841(b)(1)(B)(vi) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO

(Distribution and Possession with  
Intent to Distribute Controlled Substances)

2. On or about October 3, 2018, within the Eastern District of New York and elsewhere, the defendant MARQUIS DOUGLAS, also known as “Prince” and “President,” together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing fentanyl, a Schedule II controlled substance; (b) a substance containing heroin, a Schedule I controlled substance; and (c) a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THREE  
(Distribution of Controlled Substances  
Causing the Death of John Doe #1)

3. On or about August 12, 2021, within the Eastern District of New York and elsewhere, the defendants MARQUIS DOUGLAS, also known as “Prince” and “President,” and JESSE PACE, also known as “Jah,” together with others, did knowingly and intentionally distribute one or more controlled substances, which offense involved (a) a substance containing cocaine, a Schedule II controlled substance; and (b) a substance containing an analogue of fentanyl, to wit: fluorofentanyl, a Schedule I controlled substance, and the use of which resulted in the death of John Doe #1, an individual whose identity is known to the Grand Jury.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18,  
United States Code, Sections 2 and 3551 et seq.)

COUNT FOUR  
(Distribution of Controlled Substances  
Causing the Death of John Doe #2)

4. On or about August 12, 2021, within the Eastern District of New York and elsewhere, the defendants MARQUIS DOUGLAS, also known as “Prince” and “President,” and JESSE PACE, also known as “Jah,” together with others, did knowingly and intentionally distribute one or more controlled substances, which offense involved (a) a substance containing cocaine, a Schedule II controlled substance; and (b) a substance containing an analogue of fentanyl, to wit: fluorofentanyl, a Schedule I controlled substance, and the use of which resulted in the death of John Doe #2, an individual whose identity is known to the Grand Jury.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18,  
United States Code, Sections 2 and 3551 et seq.)

COUNT FIVE  
(Distribution of Controlled Substances  
Causing the Death of John Doe #3)

5. On or about August 12, 2021, within the Eastern District of New York and elsewhere, the defendants MARQUIS DOUGLAS, also known as “Prince” and “President,” and JESSE PACE, also known as “Jah,” together with others, did knowingly and intentionally distribute one or more controlled substances, which offense involved (a) a substance containing cocaine, a Schedule II controlled substance; and (b) a substance containing an analogue of fentanyl, to wit: fluorofentanyl, a Schedule I controlled substance, and the use of which resulted in the death of John Doe #3, an individual whose identity is known to the Grand Jury.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18,  
United States Code, Sections 2 and 3551 et seq.)

COUNT SIX  
(Distribution of Controlled Substances  
Causing the Death of John Doe #4)

6. On or about August 12, 2021, within the Eastern District of New York and elsewhere, the defendants MARQUIS DOUGLAS, also known as “Prince” and “President,” and JESSE PACE, also known as “Jah,” together with others, did knowingly and intentionally distribute one or more controlled substances, which offense involved (a) a substance containing cocaine, a Schedule II controlled substance; and (b) a substance containing an analogue of fentanyl, to wit: fluorofentanyl, a Schedule I controlled substance, and the use of which resulted in the death of John Doe #4, an individual whose identity is known to the Grand Jury.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18,  
United States Code, Sections 2 and 3551 et seq.)

COUNT SEVEN

(Possession with Intent to Distribute Controlled Substances)

7. On or about May 5, 2022, within the Eastern District of New York and elsewhere, the defendant MARQUIS DOUGLAS, also known as “Prince” and “President,” together with others, did knowingly and intentionally possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing cocaine, a Schedule II controlled substance; and (b) 40 grams or more of a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(vi) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 *et seq.*)

CRIMINAL FORFEITURE ALLEGATION

8. The United States hereby gives notice to the defendants that, upon their conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses, and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

9. If any of the above-described forfeitable property, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

*A. TRUETT*  
[Redacted]

FOREPERSON

[Redacted]

~~BREON PEACE~~ /  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT  
EASTERN District of NEW YORK  
CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

MARQUIS DOUGLAS AND JESSE PACE,

Defendants.

INFORMATION

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(A)(i), 841(b)(1)(A)(ii),  
841(b)(1)(A)(iii), 841(b)(1)(B)(vi), 841(b)(1)(C), 846, 853(a) and 853(p);  
T. 18, U.S.C., §§ 2 and 3551 et seq.)

*A true bill*

[REDACTED]

Foreperson

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

Clerk

Michael R. Maffei, Assistant U.S. Attorney (631) 715-7890