

CCC:MEM/JTK
F. #2018R01341

FILED
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U.S. DISTRICT COURT E.D.N.Y.
★ SEP 26 2018 ★
LONG ISLAND OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

INDICTMENT

- against -

GARY DAVIS,
also known as "G,"
JOEL LEE FAISON,
also known as "Face," and
TAMIEN TRENT,
also known as "Taim,"

CR 18 521
No. (T. 18, U.S.C., §§ 922(g)(1), 924(a)(2),
924(c)(1)(A)(i), 924(d)(1), 2 and
3551 et seq.; T. 21, U.S.C.,
§§ 841(a)(1), 841(b)(1)(A)(i),
841(b)(1)(A)(iii), 841(b)(1)(A)(vi),
841(b)(1)(B)(vi), 841(b)(1)(C), 846, 853(a)
and 853(p); T. 28, U.S.C., § 2461(c))

Defendants.

BIANCO, J.

----- X

THE GRAND JURY CHARGES:

SHIELDS, M.J.

COUNT ONE

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

1. In or about and between September 2014 and September 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants GARY DAVIS, also known as "G," JOEL LEE FAISON, also known as "Face," and TAMIEN TRENT, also known as "Taim," 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 base, a Schedule II controlled substance; (b) a substance containing heroin, a Schedule I controlled

substance; (c) a substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance; (d) a substance containing an analogue of fentanyl, to wit: cyclopropyl fentanyl, a Schedule I controlled substance; (e) a substance containing an analogue of fentanyl, to wit: methoxyacetyl fentanyl, a Schedule I controlled substance; and (f) a substance containing an analogue of fentanyl, to wit: furanyl fentanyl, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of cocaine base, heroin, cyclopropyl fentanyl and methoxyacetyl fentanyl involved in the conspiracy attributable to each defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, was (a) 280 grams or more of a substance containing cocaine base, (b) one kilogram or more of a substance containing heroin, (c) 100 grams or more of a substance containing cyclopropyl fentanyl, and (d) 100 grams or more of a substance containing methoxyacetyl fentanyl.

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

COUNT TWO

(Use of Firearms in Connection with a Drug Trafficking Crime)

2. In or about and between September 2014 and September 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants GARY DAVIS, also known as “G,” JOEL LEE FAISON, also known as “Face,” and TAMIEN TRENT, also known as “Taim,” together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to a

drug trafficking crime, to wit: the crime charged in Count One, and did knowingly and intentionally possess said firearms in furtherance of such drug trafficking crime.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 2 and 3551 et seq.)

COUNT THREE

(Possession of Controlled Substances with Intent to Distribute)

3. On or about January 5, 2017, within the Eastern District of New York and elsewhere, the defendants GARY DAVIS, also known as “G,” JOEL LEE FAISON, also known as “Face,” and TAMIEN TRENT, also known as “Taim,” together with others, did knowingly and intentionally possess with intent to distribute one or more controlled substances, which offense involved (a) 40 grams or more of a substance containing fentanyl, a Schedule II controlled substance; and (b) a substance containing methamphetamine, 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.)

COUNT FOUR

(Possession of Fentanyl with Intent to Distribute)

4. On or about January 13, 2017, within the Eastern District of New York and elsewhere, the defendants GARY DAVIS, also known as “G,” and TAMIEN TRENT, also known as “Taim,” together with others, did knowingly and intentionally possess with

intent to distribute a controlled substance, which offense involved a substance containing an analogue of fentanyl, to wit: furanyl fentanyl, a Schedule I 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 FIVE

(Felon in Possession of Ammunition)

5. On or about January 13, 2017, within the Eastern District of New York, the defendant GARY DAVIS, also known as “G,” together with others, having previously being convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce ammunition, to wit: Remington shotgun shells; .38 caliber Winchester lead round nose ammunition; .357 Remington hollow point ammunition; 9 mm Wolf ammunition; .357 Hornady ammunition; and .25 caliber Fiocchi ammunition.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2), 2 and 3551 et seq.)

COUNT SIX

(Felon in Possession of Ammunition)

6. On or about January 13, 2017, within the Eastern District of New York, the defendant TAMIEN TRENT, also known as “Taim,” together with others, having previously being convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce ammunition, to wit: Remington shotgun shells; .38 caliber Winchester lead round nose

ammunition; .357 Remington hollow point ammunition; 9 mm Wolf ammunition; .357 Hornady ammunition; and .25 caliber Fiocchi ammunition.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2), 2 and 3551 et seq.)

COUNT SEVEN

(Possession of Cyclopropyl Fentanyl with Intent to Distribute)

7. On or about October 27, 2017, within the Eastern District of New York and elsewhere, the defendants GARY DAVIS, also known as “G,” and TAMIEN TRENT, also known as “Taim,” together with others, did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved 100 grams or more of a substance containing an analogue of fentanyl, to wit: cyclopropyl fentanyl, a Schedule I controlled substance.

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

COUNT EIGHT

(Possession of Methoxyacetyl Fentanyl with Intent to Distribute)

8. On or about December 4, 2017, within the Eastern District of New York and elsewhere, the defendants GARY DAVIS, also known as “G,” and TAMIEN TRENT, also known as “Taim,” together with others, did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved 100 grams or

more of a substance containing an analogue of fentanyl, to wit: methoxyacetyl fentanyl, a Schedule I controlled substance.

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

COUNT NINE
(Distribution of Heroin)

9. On or about August 3, 2018, within the Eastern District of New York and elsewhere, the defendant TAMIEN TRENT, also known as “Taim,” together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing heroin, a Schedule I 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 TEN
(Distribution of Heroin)

10. On or about August 7, 2018, within the Eastern District of New York and elsewhere, the defendant TAMIEN TRENT, also known as “Taim,” together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled

substance, which offense involved a substance containing heroin, a Schedule I 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 ELEVEN
(Distribution of Heroin)

11. On or about August 10, 2018, within the Eastern District of New York and elsewhere, the defendant TAMIEN TRENT, also known as “Taim,” together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing heroin, a Schedule I 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 TWELVE
(Distribution of Heroin)

12. On or about August 14, 2018, within the Eastern District of New York and elsewhere, the defendant TAMIEN TRENT, also known as “Taim,” together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing heroin, a Schedule I 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 THIRTEEN
(Distribution of Heroin)

13. On or about September 11, 2018, within the Eastern District of New York and elsewhere, the defendant TAMIEN TRENT, also known as “Taim,” together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing heroin, a Schedule I 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.)

CRIMINAL FORFEITURE ALLEGATION AS TO
COUNTS ONE, THREE, FOUR AND SEVEN THROUGH THIRTEEN

14. The United States hereby gives notice to the defendants charged in Counts One, Three, Four and Seven through Thirteen that, upon their conviction of any such offenses, 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 a 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.

15. If any of the above-described forfeitable property, as a result of an 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))

**CRIMINAL FORFEITURE ALLEGATION AS TO
COUNTS TWO, FIVE AND SIX**

16. The United States hereby gives notice to the defendants charged in Counts Two, Five and Six that, upon their conviction of such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922 or Section 924.

17. 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 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

FOREPERSON

RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

AS THE UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. O.136

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

GARY DAVIS, also known as "G," JOEL LEE FAISON, also known
as "Face," and TAMIEN TRENT, also known as "Taim",

Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 922(g)(1), 924(a)(2), 924(c)(1)(A)(i), 924(d)(1),
2 and 3551 *et seq.*; T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(A)(i),
841(b)(1)(A)(iii), 841(b)(1)(A)(vi), 841(b)(1)(B)(vi), 841(b)(1)(C),
846, 853(a) and 853(p); T. 28, U.S.C., § 2461(c))

A true bi

Foreperson

Filed in open court this ----- day,

of ----- A.D. 20 -----

Clerk

Bail, \$ -----

Mark E. Misorek, Assistant U.S. Attorney (631) 715-7874