

**FILED**

APR - 6 2023

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

TRENT A. CAREY,  
TIFFANY A. MOSS,  
PAIGE R. ACKER,

Defendants.

) INDICTMENT

)  
)  
) **1:23 CR 199**  
) CASE NO.

) Title 18, United States Code,  
) Sections 922(a)(6), (d)(1), (g)(1),  
) 924(a)(2), (a)(8), and  
) (c)(1)(A)(i); Title 21, United  
) States Code, Sections 841(a)(1)  
) and (b)(1)(C)

**JUDGE POLSTER**

COUNT 1

(Felon in Possession of a Firearm and Ammunition,  
18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury charges:

1. On or about December 21, 2022, in the Northern District of Ohio, Eastern Division, Defendant TRENT A. CAREY, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Abduction, on or about December 1, 2009, in case number 09-CRI-070, in the Court of Common Pleas of Ashland County, Ohio; and Aggravated Trafficking in Drugs and Trafficking Cocaine, on or about May 22, 2019, in case number 19-CRI-028, in the Court of Common Pleas of Ashland County, Ohio, knowingly possessed in and affecting interstate and foreign commerce a firearm, to wit: a Glock model 43X 9mm semiautomatic pistol bearing serial number BYXN329, and ammunition, to wit: Hornady Critical Duty 9mm +P 135 ammunition, CCI Blazer 9mm ammunition, and Winchester Super-X Power-Point 22 LR caliber ammunition, said firearm and ammunition having previously

been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 2

(Possession with Intent to Distribute Fentanyl,  
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

2. On or about December 21, 2022, in the Northern District of Ohio, Eastern Division, Defendant TRENT A. CAREY did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

3. Before Defendant TRENT A. CAREY committed the offense charged in this count, the defendant had final convictions for felony drug offenses, namely, convictions under Ohio Revised Code section 2925.03(A)(1), Aggravated Trafficking in Drugs and Trafficking Cocaine, on or about May 22, 2019, in case number 19-CRI-028, in the Court of Common Pleas of Ashland County, Ohio.

COUNT 3

(Possession with Intent to Distribute Amphetamine,  
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

4. On or about December 21, 2022, in the Northern District of Ohio, Eastern Division, Defendant TRENT A. CAREY did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of amphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

5. Before Defendant TRENT A. CAREY committed the offense charged in this count, the defendant had final convictions for felony drug offenses, namely, convictions under Ohio Revised Code section 2925.03(A)(1), Aggravated Trafficking in Drugs and Trafficking Cocaine, on or about May 22, 2019, in case number 19-CRI-028, in the Court of Common Pleas of Ashland County, Ohio.

COUNT 4  
(Possession with Intent to Distribute Cocaine,  
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

6. On or about December 21, 2022, in the Northern District of Ohio, Eastern Division, Defendant TRENT A. CAREY did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

7. Before Defendant TRENT A. CAREY committed the offense charged in this count, the defendant had final convictions for felony drug offenses, namely, convictions under Ohio Revised Code section 2925.03(A)(1), Aggravated Trafficking in Drugs and Trafficking Cocaine, on or about May 22, 2019, in case number 19-CRI-028, in the Court of Common Pleas of Ashland County, Ohio.

COUNT 5  
(Possession of a Firearm in Furtherance of a Drug Trafficking Offense,  
18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

8. On or about December 21, 2022, in the Northern District of Ohio, Eastern Division, Defendant TRENT A. CAREY did knowingly possess a firearm, to wit: a Glock model 43X 9mm semiautomatic pistol bearing serial number BYXN329, in furtherance of drug

trafficking crimes for which he may be prosecuted in a court of the United States, those being: Possession with Intent to Distribute Fentanyl, as charged in Count 2 herein, Possession with Intent to Distribute Amphetamine, as charged in Count 3 herein, and Possession with Intent to Distribute Cocaine, as charged in Count 4 herein, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 6

(Transfer of a Firearm to a Felon, 18 U.S.C. §§ 922(d)(1) and 924(a)(8))

The Grand Jury further charges:

9. On or about November 19, 2022, in the Northern District of Ohio, Eastern Division, Defendant TIFFANY A. MOSS, did knowingly transfer a firearm, that being, a Glock model 43X 9mm semiautomatic pistol bearing serial number BYXN329, to Trent A. Carey, knowing and having reasonable cause to believe that Trent A. Carey had been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(8).

COUNT 7

(False Statements During Purchase of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

10. On or about November 19, 2022, in the Northern District of Ohio, Eastern Division, Defendant TIFFANY A. MOSS, in connection with the acquisition of a firearm, to wit: a Glock model 43X 9mm semiautomatic pistol bearing serial number BYXN329, from Fin, Feather, Fur Outfitters, 652 U.S. Highway 250, Ashland, OH, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made false and fictitious written statements to Fin, Feather, Fur Outfitters, which statements were intended and likely to deceive Fin, Feather, Fur Outfitters, as to a fact material to the lawfulness of such

acquisition of said firearm by Defendant TIFFANY A. MOSS under chapter 44 of Title 18, in that Defendant TIFFANY A. MOSS did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, on which Defendant TIFFANY A. MOSS falsely asserted that she was the actual transferee/buyer of the firearm, when Defendant TIFFANY A. MOSS knew that Trent A. Carey was the actual transferee/buyer of the firearm in that Defendant TIFFANY A. MOSS purchased the firearm on behalf of Trent A. Carey, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 8

(Felon in Possession of Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

11. On or about December 3, 2022, in the Northern District of Ohio, Eastern Division, Defendant PAIGE R. ACKER, knowing she had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Complicity to Aggravated Trafficking in Drugs and Complicity to Trafficking Cocaine, on or about August 20, 2019, in case number 19-CRI-027, in the Court of Common Pleas of Ashland County, Ohio, knowingly possessed in and affecting interstate and foreign commerce ammunition, to wit: Hornady Critical Duty 9mm +P 135 ammunition, and CCI Blazer 9mm ammunition, said ammunition having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 9

(Transfer of Ammunition to a Felon, 18 U.S.C. §§ 922(d)(1) and 924(a)(8))

The Grand Jury further charges:

12. On or about December 3, 2022, in the Northern District of Ohio, Eastern Division, Defendant PAIGE R. ACKER, did knowingly transfer ammunition, that being, Hornady Critical Duty 9mm +P 135 ammunition, and CCI Blazer 9mm ammunition, to Trent A. Carey, knowing and having reasonable cause to believe that Trent A. Carey had been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(8).

FORFEITURE

The Grand Jury further charges:

13. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the allegations of Counts 1 through 9 are incorporated herein by reference. As a result of the foregoing offenses, Defendants TRENT A. CAREY, TIFFANY A. MOSS, and PAIGE R. ACKER, shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of the drug violations charged herein; any and all property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the drug violations charged herein; and, any and all firearms and ammunition involved in or used in the commission of the firearms violations charged herein; including, but not limited to, the following:

- a. Glock model 43X 9mm semiautomatic pistol bearing serial number BYXN329 [Trent A. Carey and Tiffany A. Moss];
- b. Winchester Super-X Power-Point 22 LR caliber ammunition [Trent A. Carey]; and

- c. Hornady Critical Duty 9mm +P 135 ammunition, and CCI Blazer 9mm ammunition  
[Trent A. Carey and Paige R. Acker].

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government  
Act of 2002.