



**ATTACHMENT A**

**Possession with Intent to Distribute a Controlled Substance**

On or about December 1, 2020, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

DAEVON BELL,

did knowingly and intentionally possess with intent to distribute, and did attempt to distribute, 100 grams or more of a mixture and substance containing a detectable amount heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and 846.

**ATTACHMENT B**

I, Wivian J. Taveras, am a Special Agent with the Drug Enforcement Administration (DEA). I have knowledge of the facts set forth below as a result of my participation in this investigation as well as from my review of reports from, and discussions with, other law enforcement personnel. Where statements of others are related herein, they are related in substance and in part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Since in or around October, 2020 the DEA has investigated defendant DAEVON BELL (“BELL”) in connection with narcotics trafficking in the City of Trenton. The investigation revealed that BELL distributed heroin in and around Trenton, New Jersey and the surrounding areas, and used multiple locations in and around Trenton, New Jersey; Hamilton, New Jersey; and elsewhere, in furtherance of his unlawful drug-trafficking activities. A law enforcement check of criminal history records revealed that BELL has multiple felony drug-trafficking convictions, as well as a felony conviction for unlawful possession of a handgun.

2. In connection with the ongoing narcotics investigation of BELL, law enforcement received information from a reliable source that on or about December 1, 2020, BELL would be in possession of a large quantity of heroin and would be transporting the heroin with the intent to sell it.

3. On or about December 1, 2020, law enforcement observed BELL driving a black Mazda 6 (the “Mazda”) in Trenton. Thereafter, BELL drove the Mazda to an apartment complex in or around Morrisville, Pennsylvania. BELL exited the Mazda and retrieved a black bag from the trunk of the vehicle and entered the apartment complex. Shortly thereafter, BELL exited the apartment complex holding a black bag and entered the Mazda. Based upon the investigation, including, but not limited to, law enforcement’s surveillance of BELL and the information received from the reliable source referred to in paragraph 2, above, law enforcement determined that BELL possessed a quantity of heroin which he intended to sell for re-distribution, and which he knew would be re-distributed in and around Trenton, New Jersey and elsewhere.

4. Thereafter, a DEA agent approached BELL on foot while BELL was in the Mazda. As the DEA agent approached, BELL fled, and in doing so, struck the agent with the Mazda and another law enforcement vehicle occupied by a DEA task force officer. As BELL fled, law enforcement also observed him throw the black bag out of the vehicle. BELL led law enforcement on a high-speed chase and ultimately he was arrested in or around Lawrenceville, New Jersey.

5. Law enforcement recovered the bag that BELL discarded from his vehicle and found approximately 150 rectangular-shaped objects consistent with the size and shape of bricks of heroin wrapped in paper and cellophane shrink wrapping, and bearing specific stamps including stamps in green ink.<sup>1</sup> The contents of the rectangular-shaped objects were field tested and yielded positive results for heroin.

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<sup>1</sup> A “brick” of heroin typically contains approximately 50 smaller, individually packaged glassine envelopes or baggies containing heroin, which are bundled together in “bundles” of approximately ten envelopes or baggies, which are then, wrapped, and taped to form a small package. A “brick” of heroin typically contains approximately one gram of heroin.