STATE OF NEW YORK: COUNTY OF DUTCHESS COUNTY COURT

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THE PEOPLE OF THE STATE OF NEW YORK

-against-

INDICTMENT

ISAIAH ATKINS; CHRISTOPHER EVANS, a/k/a "WHIGGY; STEPHEN GARY; CURTIS HOLLAND; MUAYAD QADER, a/k/a "JUNIOR"; AARON STEPPE; ANGEL WILLIAMS,

No. 70098-24

DEFENDANTS.

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<u>COUNTS</u>

Conspiracy in the Second Degree – PL § 105.15 [B Fel] – 1 Count (Against ISAIAH ATKINS, Count 1) (Against CHRISTOPHER EVANS, Count 1) (Against CURTIS HOLLAND, Count 1) (Against MUAYAD QADER, Count 1) (Against AARON STEPPE, Count 1) (Against ANGEL WILLIAMS, Count 1)

Criminal Sale of a Controlled Substance in the Second Degree – PL § 220.41(1) [A2 Fel] – 3 Counts

(Against CHRISTOPHER EVANS, Counts 26, 37) (Against STEPHEN GARY, Count 41) (Against MUAYAD QADER, Counts 26, 37, 41) (Against AARON STEPPE, Counts 26, 37)

Criminal Sale of a Controlled Substance in the Third Degree – PL § 220.39(1) [B Fel] – 22 Counts (Against ISAIAH ATKINS, Count 35, 47, 49) (Against CHRISTOPHER EVANS, Counts 16, 27, 33, 35, 38, 47, 51) (Against STEPHEN GARY, Count 42) (Against CURTIS HOLLAND, Counts 35, 47, 49) (Against MUAYAD QADER, Counts 2, 4, 6, 8, 10, 12, 14, 16, 18, 20, 22, 24, 27, 33, 35, 38, 42, 45, 47) (Against AARON STEPPE, Counts 4, 6, 8, 10, 14, 16, 18, 24, 27, 30, 33, 35, 38, 47, 51) (Against ANGEL WILLIAMS, Count 30)

Criminal Possession of a Controlled Substance in the Second Degree - PL § 220.18(1) [A2 Fel] – 1 Count

(Against ISAIAH ATKINS, Count 54)

Criminal Possession of a Controlled Substance in the Third Degree - PL § 220.16(1) [B Fel] – 28 Counts

(Against ISAIAH ATKINS, Counts 36, 48, 50, 55)
(Against CHRISTOPHER EVANS, Counts 17, 28, 34, 36, 39, 48, 52, 58)
(Against STEPHEN GARY, Count 43)
(Against CURTIS HOLLAND, Counts 36, 48, 50, 61)
(Against MUAYAD QADER, Counts 3, 5, 7, 9, 11, 13, 15, 17, 19, 21, 23, 25, 28, 32, 34, 36, 39, 43, 46, 48, 53, 57)
(Against AARON STEPPE, Counts 5, 7, 9, 11, 15, 17, 19, 25, 28, 31, 34, 36, 39, 48, 52, 58)
(Against ANGEL WILLIAMS, Counts 31, 58)

Criminal Possession of a Controlled Substance in the Third Degree – PL § 220.16(12) [B Fel] – 4 Counts

(Against ISAIAH ATKINS, Count 56) (Against CHRISTOPHER EVANS, Counts 29, 40) (Against STEPHEN GARY, Count 44) (Against MUAYAD QADER, Counts 29, 40, 44) (Against AARON STEPPE, Counts 29, 40)

Criminally Using Drug Paraphernalia in the Second Degree – PL § 220.50(2) [A Misd] – 1 Count

(Against CHRISTOPHER EVANS, Count 59) (Against AARON STEPPE, Count 59) (Against ANGEL WILLIAMS, Count 59) Criminally Using Drug Paraphernalia in the Second Degree – PL § 220.50(3) [A Misd] – 1 Count

(Against CHRISTOPHER EVANS, Count 60) (Against CURTIS HOLLAND, Counts 62, 63) (Against AARON STEPPE, Count 60) (Against ANGEL WILLIAMS, Count 60)

> NICOLE KEARY Deputy Attorney General Organized Crime Task Force

BY: GRIFFIN C. KENYON Assistant Deputy Attorney General Organized Crime Task Force

A TRUE BILL

GRAND JURY FOREPERSON Dated: February 9, 2024

STATE OF NEW YORK: COUNTY OF DUTCHESS COUNTY COURT

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THE PEOPLE OF THE STATE OF NEW YORK

-against-

INDICTMENT

ISAIAH ATKINS; CHRISTOPHER EVANS, a/k/a "WHIGGY"; STEPHEN GARY; CURTIS HOLLAND; MUAYAD QADER, a/k/a "JUNIOR"; AARON STEPPE; ANGEL WILLIAMS,

No. 70098-24

DEFENDANTS.

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COUNT 1

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, ISAIAH ATKINS; CHRISTOPHER EVANS a/k/a "WHIGGY" (hereinafter, "CHRISTOPHER EVANS"); CURTIS HOLLAND; MUAYAD QADER a/k/a "JUNIOR" (hereinafter, "MUAYAD QADER"); AARON STEPPE; and ANGEL WILLIAMS, of the crime of CONSPIRACY IN THE SECOND DEGREE, in violation of Section 105.15 of the Penal Law of the State of New York, committed as follows:

On or about and between January 30, 2023, and September 29, 2023, in Dutchess County, with intent that conduct constituting the crimes of Criminal Sale of a Controlled Substance in the Second Degree, in violation of Section 220.41(1) of the Penal Law of the State of New York, and/or Criminal Possession of a Controlled Substance in the Second Degree, in violation of Section 220.18(1) of the Penal Law of the State of New York, said crimes being class A felonies, be committed, the defendants did knowingly and intentionally agree with each other and with others,

known and unknown, to engage in and cause the performance of such conduct as would constitute any of the above-mentioned class A felonies.

PREAMBLE

It was the purpose of this conspiracy to acquire, possess, with intent to sell, and sell counterfeit oxycodone pills containing fentanyl in Dutchess County.

It was the role of **MUAYAD QADER** to supply counterfeit oxycodone pills containing fentanyl for resale in Dutchess County to several individuals whose identities are known to the Grand Jury. It was also the role of **MUAYAD QADER** to acquire counterfeit oxycodone pills containing fentanyl for resale in Dutchess County from **AARON STEPPE**, **CHRISTOPHER EVANS** and **ANGEL WILLIAMS**.

It was the role of AARON STEPPE, with CHRISTOPHER EVANS and ANGEL WILLIAMS, to supply counterfeit oxycodone pills containing fentanyl for resale in Dutchess County to MUAYAD QADER. It was also the role of AARON STEPPE, with CHRISTOPHER EVANS, to acquire counterfeit oxycodone pills containing fentanyl for resale in Dutchess County from ISAIAH ATKINS.

It was the role of CHRISTOPHER EVANS, with AARON STEPPE, to supply counterfeit oxycodone pills containing fentanyl for resale in Dutchess County.

It was the role of **ANGEL WILLIAMS**, with **AARON STEPPE**, to supply counterfeit oxycodone pills containing fentanyl for resale in Dutchess County.

It was the role of **ISAIAH ATKINS** to supply counterfeit oxycodone pills containing fentanyl for resale in Dutchess County to **AARON STEPPE** and **CHRISTOPHER EVANS**. It was also the role of **ISAIAH ATKINS** to acquire counterfeit oxycodone pills containing fentanyl for resale in Dutchess County from **CURTIS HOLLAND**. It was the role of **CURTIS HOLLAND** to supply counterfeit oxycodone pills containing fentanyl for resale in Dutchess County.

It was also part of the conspiracy for members of the conspiracy to communicate with each other and others over cellular telephones using coded terminology and speaking in a guarded, cryptic manner.

OVERT ACTS

In furtherance of said conspiracy and to achieve the objects thereof, and during the course thereof, the following overt acts, among others, were committed:

- On or about January 30, 2023, MUAYAD QADER sent an iMessage to an individual known to the Grand Jury, which stated, in sum and substance, "Bout to have em in 20 mins".
- On or about January 30, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, MUAYAD QADER sold a quantity of counterfeit oxycodone pills containing fentanyl to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by MUAYAD QADER.
- 3. On or about March 23, 2023, MUAYAD QADER sent an iMessage to an individual known to the Grand Jury, which stated, in sum and substance, "On my way to grab those 30 still waiting on dude for those other things".
- 4. On or about March 23, 2023, in the vicinity of 81 Fallkill Avenue, Poughkeepsie, New York 12601, in Dutchess County, AARON STEPPE met MUAYAD QADER and provided a quantity of counterfeit oxycodone pills containing fentanyl to MUAYAD QADER.

- 5. On or about March 23, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, MUAYAD QADER sold a quantity of counterfeit oxycodone pills containing fentanyl to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by MUAYAD QADER.
- 6. On or about March 31, 2023, in the vicinity of 81 Fallkill Avenue, Poughkeepsie, New York 12601, in Dutchess County, AARON STEPPE provided a quantity of counterfeit oxycodone pills containing fentanyl to MUAYAD QADER.
- 7. On or about March 31, 2023, **MUAYAD QADER** sent an iMessage to an individual known to the Grand Jury, which stated, "Yo on my way back to the store with those".
- 8. On or about March 31, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, MUAYAD QADER sold a quantity of counterfeit oxycodone pills containing fentanyl to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by MUAYAD QADER.
- 9. On or about April 24, 2023, **MUAYAD QADER** sent an iMessage to an individual known to the Grand Jury, which stated, "Yeah I got a 30 piece if you wanna reach out".
- 10. On or about April 25, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, AARON STEPPE arrived at the location in AARON STEPPE's Infiniti G35 in order to provide MUAYAD QADER with a quantity of counterfeit oxycodone pills containing fentanyl.
- On or about April 25, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, MUAYAD QADER sold a quantity of counterfeit

oxycodone pills containing fentanyl to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by MUAYAD QADER.

- 12. On or about May 7, 2023, in the vicinity of 62 Janet Drive, Apt. D, Poughkeepsie, New York 12603, in Dutchess County, **MUAYAD QADER** sold a quantity of counterfeit oxycodone pills containing fentanyl to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
- 13. On May 13, 2023, **MUAYAD QADER** sent an SMS/text message to an individual known to the Grand Jury, in response to an inquiry into his current pill inventory, which stated, in sum and substance, "For a 30?"
- 14. On May 13, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York
 12540, in Dutchess County, AARON STEPPE arrived at the location in AARON
 STEPPE's Infiniti G35 in order to provide MUAYAD QADER with a quantity of counterfeit oxycodone pills containing fentanyl.
- 15. On June 1, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, AARON STEPPE arrived at the location in AARON STEPPE's Infiniti G35 in order to provide MUAYAD QADER with a quantity of counterfeit oxycodone pills containing fentanyl.
- 16. On June 13, 2023, MUAYAD QADER sent an MMS message to an individual known to the Grand Jury, which contained a photograph of an iMessage exchange between MUAYAD QADER and his pill supplier.
- 17. On June 13, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, MUAYAD QADER exited the location and met with AARON STEPPE and CHRISTOPHER EVANS, both seated in AARON STEPPE's Infiniti G35, in the

parking lot of the location, in order to acquire a quantity of counterfeit oxycodone pills containing fentanyl for resale to an individual known to the Grand Jury.

- 18. On July 11, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, AARON STEPPE arrived at the location in AARON STEPPE's Infiniti G35 in order to provide MUAYAD QADER with a quantity of counterfeit oxycodone pills containing fentanyl.
- 19. On July 31, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, **MUAYAD QADER** exited the location and entered the front passenger seat of **AARON STEPPE'S** Infiniti G35, to acquire a quantity of counterfeit oxycodone pills containing fentanyl for later resale to an individual known to the Grand Jury.
- 20. On August 3, 2023, **MUAYAD QADER** had a phone conversation with **AARON STEPPE**, during which **AARON STEPPE** stated, in sum and substance, "All right, so...how, how many do you want?", and **MUAYAD QADER** responded, in sum and substance, "Sixty."
- 21. On August 3, 2023, AARON STEPPE recounted a conversation to ANGEL WILLIAMS, while seated within AARON STEPPE's Infiniti G35, in sum and substance, "I said, 'What you want me to bring? I'll just give it to you when I get this one coming in. Make it happen. Come back and get my money.' He said, 'Cool, cool. Bring me a sixty.' That means he ran through three hundred in three days", referring to MUAYAD QADER.
- 22. On August 3, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, AARON STEPPE, with ANGEL WILLIAMS, arrived

at the location in **AARON STEPPE**'s Infiniti G35 in order to provide **MUAYAD QADER** with a quantity of counterfeit oxycodone pills containing fentanyl.

- 23. On August 3, 2023, **ISAIAH ATKINS** sent two SMS/text messages to **CURTIS HOLLAND** which stated, in sum and substance, "Ima need the same thing in a few", and, "That 450", to which **CURTIS HOLLAND** responded, "Kopy".
- 24. On August 3, 2023, AARON STEPPE and CHRISTOPHER EVANS had a conversation inside of AARON STEPPE's Infiniti G35, during which AARON STEPPE stated, in sum and substance, "You said that makes two-forty-six though, right?", to which CHRISTOPHER EVANS stated, in sum and substance, "Yeah, I had fifty-nine. And then, one-eighty seven."
- 25. On August 3, 2023, **ISAIAH ATKINS** sent an SMS/text message to **CURTIS HOLLAND**, which stated, in sum and substance, "And have the 350 separate rom the other buck", to which **CURTIS HOLLAND** responded, "Kopy I'm ready now bro".
- 26. On August 3, 2023, CURTIS HOLLAND transported ISAIAH ATKINS in his vehicle to the vicinity of 120 Hudson Avenue, Apt. 8A13, Poughkeepsie, New York 12601, in Dutchess County, so that ISAIAH ATKINS could provide a quantity of counterfeit oxycodone pills containing fentanyl to AARON STEPPE and CHRISTOPHER EVANS for later resale.
- 27. On August 3, 2023, AARON STEPPE and CHRISTOPHER EVANS had a conversation inside of AARON STEPPE's Infiniti G35, during which CHRISTOPHER EVANS stated, in sum and substance, "What he needed now?", to which AARON STEPPE responded, "Fifty-six. To make that shit three hundred."

- 28. On August 3, 2023, in the vicinity of 1144 State Route 55, LaGrangeville, New York 12540, in Dutchess County, MUAYAD QADER, AARON STEPPE, and CHRISTOPHER EVANS sold a quantity of counterfeit oxycodone pills containing fentanyl to an individual known to the Grand Jury, in exchange for a quantity of United States currency collected by MUAYAD QADER.
- 29. On August 25, 2023, AARON STEPPE and ISAIAH ATKINS had a phone conversation, during which AARON STEPPE stated, in sum and substance, "Yo, all right, I'm about to be done in like two hours", ISAIAH ATKINS responded, in sum an substance, "With what?", and AARON STEPPE responded, in sum and substance, "With all my shit..."
- 30. On August 25, 2023, AARON STEPPE stated to CHRISTOPHER EVANS, during a conversation within AARON STEPPE's Infiniti G35, in sum and substance,
 "...Valero still owes me money, gave me everything for the three hundred, still owes me fifteen-hundred dollars."
- 31. On or about September 10, 2023, in the vicinity of 62 Janet Drive, Apt. D, Poughkeepsie, New York 12603, **MUAYAD QADER** sold a quantity of counterfeit oxycodone pills containing fentanyl to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by **MUAYAD QADER**.
- 32. On September 18, 2023, ISAIAH ATKINS sent two SMS/text messages to CURTIS HOLLAND. The first SMS/text message stated, in sum and substance, "When you get up bring 500 to me". The second SMS/text message stated, in sum and substance, "350 in one bag and 150 in another bag".

- 33. On September 18, 2023, AARON STEPPE had a phone conversation with ISAIAH ATKINS, during which AARON STEPPE stated, in sum and substance, "I kinda really need five hundred, bro, and then I'm just gonna…handle what I gotta handle. And get some more from you right after I'm done, or something, like?", and ISAIAH ATKINS responded, in sum and substance, "Cause I got your three-fifty right here."
- 34. On September 18, 2023, AARON STEPPE, in the presence of ANGEL WILLIAMS, had a phone conversation with ISAIAH ATKINS, during which ISAIAH ATKINS stated, in sum and substance, "So you gonna have the five hundred money today then?", AARON STEPPE stated, in sum and substance, "Yeah bitch. That's why I kept asking you for this shit.", and ANGEL WILLIAMS stated, in sum and substance, "Come on... Get with the program."
- 35. On September 18, 2023, AARON STEPPE, CHRISTOPHER EVANS, and ISAIAH ATKINS had a conversation inside of AARON STEPPE's Infiniti G35, during which AARON STEPPE stated, in sum and substance, "Bro yeah, and here, here are all those bad shits", ISAIAH ATKINS stated, in sum and substance, "Yo, you got your bad shits too?", and CHRISTOPHER EVANS stated, in sum and substance, "Not on me..."
- 36. On September 18, 2023, AARON STEPPE and ISAIAH ATKINS had a phone conversation, during which AARON STEPPE stated, in sum and substance, "Yo. Why, what, what's in the glove?", to which ISAIAH ATKINS responded, in sum and substance, "Oh that, that's three-fifty. Three-fifty is in...the plastic bag. The one fifty's in the other."

- 37. On September 18, 2023, MUAYAD QADER, AARON STEPPE, and CHRISTOPHER EVANS sold a quantity of counterfeit oxycodone pills containing fentanyl to an individual known to the Grand Jury, in exchange for a sum of United States currency collected by MUAYAD QADER.
- 38. On September 18, 2023, ISAIAH ATKINS, AARON STEPPE, and CHRISTOPHER EVANS traveled to the vicinity of 595 Main Street, Poughkeepsie, New York 12601, in Dutchess County, in order for ISAIAH ATKINS to meet CURTIS HOLLAND to acquire a quantity of counterfeit oxycodone pills containing fentanyl.
- 39. On September 29, 2023, inside of 62 Janet Drive, Apt. D, Poughkeepsie, New York 12603, in Dutchess County, MUAYAD QADER possessed a quantity of counterfeit oxycodone pills containing fentanyl.
- 40. On September 29, 2023, inside of 120 Hudson Avenue, Apt. 8A13, Poughkeepsie, New York 12601, in Dutchess County, AARON STEPPE, CHRISTOPHER EVANS, and ANGEL WILLIAMS possessed a quantity of counterfeit oxycodone pills containing flourofentanyl.
- 41. On September 29, 2023, inside of 4 Edgar Street, Poughkeepsie, New York 12603,ISAIAH ATKINS possessed a quantity of counterfeit oxycodone pills containing fentanyl.
- 42. On September 29, 2023, inside of 205 Church Street, Apt. 504, Poughkeepsie, New York 12601, **CURTIS HOLLAND** possessed a quantity of counterfeit oxycodone pills containing fentanyl.

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, MUAYAD QADER, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 30, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

COUNT 3

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, MUAYAD QADER, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 30, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 4</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **AARON STEPPE**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 23, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, MUAYAD QADER and AARON STEPPE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 23, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

COUNT 6

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **AARON STEPPE**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 31, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

COUNT 7

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, MUAYAD QADER and AARON STEPPE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 31, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **AARON STEPPE**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about April 25, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

COUNT 9

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, MUAYAD QADER and AARON STEPPE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about April 25, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 10</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **AARON STEPPE**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 2, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 11</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **AARON STEPPE**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 2, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 12</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 7, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 13</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, MUAYAD QADER, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 7, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 14</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **AARON STEPPE**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 13, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 15</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, MUAYAD QADER and AARON STEPPE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 13, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 16</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER**; **AARON STEPPE**; and **CHRISTOPHER EVANS**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 1, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER**; **AARON STEPPE**; and **CHRISTOPHER EVANS**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 1, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 18</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **AARON STEPPE**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 13, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 19</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, MUAYAD QADER and AARON STEPPE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 13, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 20</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, MUAYAD QADER, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 29, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 21</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, MUAYAD QADER, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 29, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 22</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, MUAYAD QADER, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about July 6, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 23</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, MUAYAD QADER, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about July 6, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 24</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **AARON STEPPE**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about July 11, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 25</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, MUAYAD QADER and AARON STEPPE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about July 11, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 26</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER**; **AARON STEPPE**; and **CHRISTOPHER EVANS**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about July 31, 2023, in Dutchess County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

<u>COUNT 27</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER**; **AARON STEPPE**; and **CHRISTOPHER EVANS**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about July 31, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 28</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, MUAYAD QADER; AARON STEPPE; and CHRISTOPHER EVANS, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD

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DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about July 31, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 29</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER**; **AARON STEPPE**; and **CHRISTOPHER EVANS**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about July 31, 2023, in Dutchess County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

<u>COUNT 30</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, AARON STEPPE and ANGEL WILLIAMS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 3, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 31</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **AARON STEPPE** and **ANGEL WILLIAMS**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 3, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 32</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, MUAYAD QADER, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 3, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 33</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER**; **AARON STEPPE**; and **CHRISTOPHER EVANS**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 3, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 34</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER**; **AARON STEPPE**; and **CHRISTOPHER EVANS**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 3, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 35</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, MUAYAD QADER; AARON STEPPE; CHRISTOPHER EVANS; ISAIAH ATKINS; and CURTIS HOLLAND, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 3, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 36</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, MUAYAD QADER; AARON STEPPE; CHRISTOPHER EVANS; ISAIAH ATKINS; and CURTIS HOLLAND, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 3, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 37</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER**; **AARON STEPPE**; and **CHRISTOPHER EVANS**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 25, 2023, in Dutchess County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of one half ounce or more.

<u>COUNT 38</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER**; **AARON STEPPE**; and **CHRISTOPHER EVANS**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 25, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

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<u>COUNT 39</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER**; **AARON STEPPE**; and **CHRISTOPHER EVANS**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 25, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 40</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER**; **AARON STEPPE**; and **CHRISTOPHER EVANS**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 25, 2023, in Dutchess County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

<u>COUNT 41</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, MUAYAD QADER and STEPHEN GARY, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about September 5, 2023, in Dutchess County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

<u>COUNT 42</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **STEPHEN GARY**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about September 5, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 43</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **MUAYAD QADER** and **STEPHEN GARY**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about September 5, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 44</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, MUAYAD QADER and STEPHEN GARY, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about September 5, 2023, in Dutchess County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

<u>COUNT 45</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **MUAYAD QADER**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 10, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 46</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, MUAYAD QADER, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 10, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 47</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, MUAYAD QADER; AARON STEPPE; CHRISTOPHER EVANS; ISAIAH ATKINS; and CURTIS HOLLAND, of the crime of CRIMINAL SALE OF A

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CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about September 18, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 48</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants MUAYAD QADER; AARON STEPPE; CHRISTOPHER EVANS; ISAIAH ATKINS; and CURTIS HOLLAND, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about September 18, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 49</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **ISAIAH ATKINS** and **CURTIS HOLLAND**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about September 18, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 50</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, ISAIAH ATKINS and CURTIS HOLLAND, of the crime of CRIMINAL

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POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation

of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about September 18, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 51</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, AARON STEPPE and CHRISTOPHER EVANS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about September 18, 2023, in Dutchess County, did knowingly and unlawfully sell a narcotic drug.

<u>COUNT 52</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **AARON STEPPE** and **CHRISTOPHER EVANS**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about September 18, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 53</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, MUAYAD QADER, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 18, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 54</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, ISAIAH ATKINS, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.18(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 29, 2023, in Dutchess County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

<u>COUNT 55</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, ISAIAH ATKINS, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 29, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 56</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, ISAIAH ATKINS, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 29, 2023, in Dutchess County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

<u>COUNT 57</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, MUAYAD QADER, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 29, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 58</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **AARON STEPPE**; **CHRISTOPHER EVANS**; and **ANGEL WILLIAMS**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about September 29, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug with intent to sell it.

<u>COUNT 59</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **AARON STEPPE**; **CHRISTOPHER EVANS**; and **ANGEL WILLIAMS**, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE**, in violation of Section 220.50(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about September 29, 2023, in Dutchess County, did knowingly possess ziplock bags suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing knowledge that some person intends to use, or under circumstances evincing knowledge that some person intends to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

<u>COUNT 60</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendants, **AARON STEPPE**; **CHRISTOPHER EVANS**; and **ANGEL WILLIAMS**, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE**, in violation of Section 220.50(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about September 29, 2023, in Dutchess County, did knowingly possess a scale used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

<u>COUNT 61</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **CURTIS HOLLAND**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 29, 2023, in Dutchess County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.

<u>COUNT 62</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **CURTIS HOLLAND**, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE**, in violation of Section 220.50(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 29, 2023, in Dutchess County, did knowingly possess a scale used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

<u>COUNT 63</u>

THE GRAND JURY OF DUTCHESS COUNTY, by this Indictment, accuses the defendant, **CURTIS HOLLAND**, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE**, in violation of Section 220.50(3) of the Penal Law of the State of New York, committed as follows: Said defendant, on or about September 29, 2023, in Dutchess County, did knowingly possess a scale used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Dated: February 9, 2024 Dutchess County, New York

> NICOLE KEARY Deputy Attorney General Organized Crime Task Force

By

GRIFFIN C. KENYON Assistant Deputy Attorney General Organized Crime Task Force

A TRUE BILL

GRAND JURY FOREPERSON Dated: February 9, 2024

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Count 33 – PL 220.39(1)
Count 34 – PL 220.16(1)
Count 35 – PL 220.39(1)
Count 36 – PL 220.16(1)
Count 37 – PL 220.41(1)
Count 38 – PL 220.39(1)
Count 39 – PL 220.16(1)
Count 40 – PL 220.16(12)
Count $41 - PL 220.41(1)$
Count $42 - PL 220.39(1)$
Count $43 - PL 220.16(1)$
Count 44 – PL 220.16(12)
Count 45 – PL 220.39(1)
Count $46 - PL 220.39(1)$ Count $46 - PL 220.16(1)$
Count $47 = PL 220.10(1)$
Count 47 – PL 220.39(1) Count 48 – PL 220.16(1)
Count 48 – PL 220.16(1) Count 53 – PL 220.16(1)
Count 53 – PL 220.16(1) Count 57 – PL 220.16(1)
Count 37 = 1 L 220.10(1)

AARON STEPPE

AARON SIEITE
Count 1 – PL 105.15(1)
Count 4 – PL 220.39(1)
Count 5 – PL 220.16(1)
Count 6 – PL 220.39(1)
Count 7 – PL 220.16(1)
Count 8 – PL 220.39(1)
Count $9 = PL 220.16(1)$
Count 10 – PL 220.39(1)
Count 11 – PL 220.16(1)
Count 10 – PL 220.39(1) Count 11 – PL 220.39(1) Count 11 – PL 220.16(1) Count 14 – PL 220.39(1) Count 15 – PL 220.16(1)
Count 15 – PL 220.16(1)
Count 16 – PL 220.39(1)
Count 17 – PL 220.16(1)
Count 18 – PL 220.39(1)
Count 19 – PL 220.16(1)
Count 24 – PL 220.39(1)
Count 25 – PL 220.16(1)
Count $26 = PI - 220 A1(1)$
Count 27 – PL 220.39(1)
Count 28 – PL 220.16(1)
Count 29 – PL 220.16(12)
Count 20 – PL 220.41(1) Count 27 – PL 220.39(1) Count 28 – PL 220.16(1) Count 29 – PL 220.16(12) Count 30 – PL 220.39(1) Count 31 – PL 220.16(1)
Count 31 – PL 220.16(1)
Count 33 – PL 220.39(1)
Count 34 – PL 220.16(1)
Count 35 – PL 220.39(1)
Count 36 – PL 220.16(1)
Count 37 – PL 220.41(1)
Count 38 DI 220 30(1)
Count 39 – PL 220.16(1)
Count 40 – PL 220.16(12)
Count 47 – PL 220.39(1)
Count 38 – PL 220.39(1) Count 39 – PL 220.16(1) Count 40 – PL 220.16(12) Count 47 – PL 220.39(1) Count 48 – PL 220.16(1) Count 51 – PL 220.39(1)
Count 51 – PL 220.39(1)
Count $52 - PL 220.16(1)$
Count 58 – PL 220.16(1)
Count 59 – PL 220.50(2)
Count 60 – PL 220.50(3)

CHRISTOPHER EVANS

 $\begin{array}{l} \text{Count } 1 - \text{PL } 105.15(1) \\ \text{Count } 16 - \text{PL } 220.39(1) \\ \text{Count } 17 - \text{PL } 220.16(1) \\ \text{Count } 26 - \text{PL } 220.41(1) \\ \text{Count } 27 - \text{PL } 220.39(1) \\ \text{Count } 28 - \text{PL } 220.16(1) \\ \text{Count } 29 - \text{PL } 220.16(12) \\ \text{Count } 33 - \text{PL } 220.39(1) \\ \text{Count } 34 - \text{PL } 220.16(1) \\ \text{Count } 35 - \text{PL } 220.39(1) \\ \text{Count } 36 - \text{PL } 220.16(1) \\ \text{Count } 37 - \text{PL } 220.41(1) \\ \end{array}$

Count 38 – PL 220.39(1) Count 39 – PL 220.16(1) Count 40 – PL 220.16(12) Count 47 – PL 220.39(1) Count 48 – PL 220.39(1) Count 51 – PL 220.39(1) Count 52 – PL 220.16(1) Count 58 – PL 220.16(1) Count 59 – PL 220.50(2) Count 60 – PL 220.50(3)

ISAIAH ATKINS

Count 1 – PL 105.15(1)
Count 35 – PL 220.39(1)
Count 36 – PL 220.16(1)
Count 47 – PL 220.39(1)
Count 48 – PL 220.16(1)
Count 49 – PL 220.39(1)
Count 50 – PL 220.16(1)
Count 54 – PL 220.18(1)
Count 55 – PL 220.16(1)
Count 56 - PL 220.16(12)

CURTIS HOLLAND

Count 1 – PL 105.15(1) Count 35 – PL 220.39(1) Count 36 – PL 220.16(1) Count 47 – PL 220.39(1) Count 48 – PL 220.39(1) Count 49 – PL 220.39(1) Count 50 – PL 220.16(1) Count 61 – PL 220.16(1) Count 62 – PL 220.50(3) Count 63 – PL 220.50(3)

ANGEL WILLIAMS

Count 1 – PL 105.15(1) Count 30 – PL 220.39(1) Count 31 – PL 220.16(1) Count 58 – PL 220.16(1) Count 59 – PL 220.50(2) Count 60 – PL 220.50(3)

STEPHEN GARY

Count 41 – PL 220.41(1)
Count 42 – PL 220.39(1)
Count 43 – PL 220.16(1)
Count 44 – PL 220.16(12)

STATE OF NEW YORK: COUNTY OF DUTCHESS COUNTY COURT

THE PEOPLE OF THE STATE OF NEW YORK

- against -

ISAIAH ATKINS; CHRISTOPHER EVANS, a/k/a/ "WHIGGY"; STEPHEN GARY; CURTIS HOLLAND; MUAYAD QADER, a/k/a "JUNIOR; AARON STEPPE; ANGEL WILLIAMS,

DEFENDANTS.

INDICTMENT NO. 70098-24

LETITIA JAMES Attorney General

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