

I N D I C T M E N T

S U P R E M E C O U R T O F T H E S T A T E O F N E W Y O R K  
C O U N T Y O F K I N G S

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS, CRIMINAL TERM

-----X

THE PEOPLE OF THE STATE OF NEW YORK

-against-

INDICTMENT NO.

76452-2024

- X. JADIN RUTH;
- X. SHAWN WILTSHIRE;
- X. HAASHIM MCCORKLE;
- X. HUBY RAMKISSOON;
- X. STANLEY LAUREANO A/K/A "SESS";
- X. CHRISTOPHER MCMILLIAN A/K/A "MAC";
- X. SHAWN HILL;
- X. HENRY JONES A/K/A HENRY JAMES;

GRAND JURY NO.

03314-2024

DEFENDANTS.

-----X

**COUNTS**

**Conspiracy in the Second Degree – PL 105.15 [B Fel] – 1 Count**

- (against Jadin Ruth, Count 1) – 1 Count
- (against Shawn Wiltshire, Count 1) – 1 Count
- (against Haashim McCorkle, Count 1) – 1 Count
- (against Huby Ramkissoon, Count 1) – 1 Count
- (against Stanley Laureano, Count 1) – 1 Count
- (against Christopher McMillian, Count 1) – 1 Count

**Criminal Sale of a Controlled Substance in the First Degree – PL 220.43(1) [A-I Fel] – 18 Counts**

- (against Jadin Ruth, Counts 2, 7, 28, 34, 41, 46, 53, 60, 71, 76, 81, 86, 91, 104, 124, 130, 136, 141) – 18 Counts
- (against Haashim McCorkle, Counts 2, 7) – 2 Counts
- (against Huby Ramkissoon, Counts 2, 7) – 2 Counts
- (against Stanley Laureano, Counts 2, 7) – 2 Counts
- (against Shawn Wiltshire, Counts 28, 34, 41, 46, 53, 60, 71, 76, 81, 86, 91, 104) – 12 Counts
- (against Christopher McMillian, Count 34) – 1 Count

**Attempted Criminal Sale of a Controlled Substance in the First Degree – PL 110.00/220.43(1) [A-II Fel] – 1 Count**

(against Huby Ramkissoon, Count 13) – 1 Count

(against Stanley Laureano, Count 13) – 1 Count

**Criminal Sale of a Controlled Substance in the Second Degree – PL 220.41(1) [A-II Fel] – 24 Counts**

(against Jadin Ruth, Counts 3, 8, 20, 24, 29, 35, 42, 47, 54, 61, 67, 72, 77, 82, 87, 92, 96, 100, 105, 116, 125, 131, 137, 142) – 24 Counts

(against Haashim McCorkle, Counts 3, 8, 20, 24) – 4 Counts

(against Huby Ramkissoon, Counts 3,8) – 2 Counts

(against Stanley Laureano, Counts 3, 8) – 2 Counts

(against Shawn Wiltshire, Counts 29, 35, 42, 47, 54, 61, 67, 72, 77, 82, 87, 92, 96, 100, 105) – 15 Counts

(against Christopher McMillian, Count 35) – 1 Count

**Attempted Criminal Sale of a Controlled Substance in the Second Degree – PL 110/220.41(1) [B-Fel] – 1 Count**

(against Huby Ramkissoon, Count 14) – 1 Count

(against Stanley Laureano, Count 14) – 1 Count

**Criminal Sale of a Controlled Substance in the Third Degree – PL 220.39(1) [B Fel] – 24 Counts**

(against Jadin Ruth, Counts 4, 9, 21, 25, 30, 36, 43, 48, 55, 62, 68, 73, 78, 83, 88, 93, 97, 101, 106, 117, 126, 132, 138, 143) – 24 Counts

(against Haashim McCorkle, Counts 4, 9, 21, 25) – 4 Counts

(against Huby Ramkissoon, Counts 4, 9) – 2 Counts

(against Stanley Laureano, Counts 4, 9) – 2 Counts,

(against Shawn Wiltshire, Counts 30, 36, 43, 48, 55, 62, 68, 73, 78, 83, 88, 93, 97, 101, 106) – 15 Counts

(against Christopher McMillian, Count 36) – 1 Count

**Attempted Criminal Sale of a Controlled Substance in the Third Degree – PL 110/220.39(1) [C Fel] – 1 Count**

(against Huby Ramkissoon, Count 15) – 1 Count

(against Stanley Laureano, Count 15) – 1 Count

**Criminal Possession of a Controlled Substance in the First Degree – PL 220.21(1) [A-I Fel] – 5 Counts**

(against Jadin Ruth, Counts 37, 49, 56, 63) – 4 Counts

(against Huby Ramkissoon, Count 16) – 1 Count

(against Stanley Laureano, Count 16) – 1 Count

(against Shawn Wiltshire, Counts 37, 49, 56, 63) – 4 Counts

(against Christopher McMillian, Count 37) – 1 Count

**Criminal Possession of a Controlled Substance in the Second Degree – PL 220.18(1) [A-II Fel] – 9 Counts**

(against Jadin Ruth, Counts 10, 31, 38, 50, 57, 64, 127, 133) – 8 Counts

(against Haashim McCorkle, Count 10) – 1 Count

(against Huby Ramkissoon, Counts 10, 17) – 2 Counts

(against Stanley Laureano, Counts 10, 17) – 2 Counts

(against Shawn Wiltshire, Counts 31, 38, 50, 57, 64) – 5 Counts

(against Christopher McMillian, Count 38) – 1 Count

**Criminal Possession of a Controlled Substance in the Third Degree – PL 220.16(1) [B Fel] – 25 Counts**

(against Jadin Ruth, Counts 5, 11, 22, 26, 32, 39, 44, 51, 58, 65, 69, 74, 79, 84, 89, 94, 98, 102, 107, 118, 128, 134, 139, 144) – 24 Counts

(against Haashim McCorkle, Counts 5, 11, 22, 26) – 4 Counts

(against Huby Ramkissoon, Counts 5, 11, 18) – 3 Counts

(against Stanley Laureano, Counts 5, 11, 18) – 3 Counts

(against Shawn Wiltshire, Counts 32, 39, 44, 51, 58, 65, 69, 74, 79, 84, 89, 94, 98, 102, 107) – 15 Counts

(against Christopher McMillian, Count 39) – 1 Count

**Criminal Possession of a Controlled Substance in the Third Degree – PL 220.16(12) [B Fel] – 25 Counts**

(against Jadin Ruth, Counts 6, 12, 23, 27, 33, 40, 45, 52, 59, 66, 70, 75, 80, 85, 90, 95, 99, 103, 108, 119, 129, 135, 140, 145) – 24 Counts

(against Haashim McCorkle, Counts 6, 12, 23, 27) – 4 Counts

(against Huby Ramkissoon, Counts 6, 12, 19) – 3 Counts

(against Stanley Laureano, Counts 6, 12, 19) – 3 Counts

(against Shawn Wiltshire, Counts 33, 40, 45, 52, 59, 66, 70, 75, 80, 85, 90, 95, 99, 103, 108) – 15 Counts

(against Christopher McMillian, Count 40) – 1 Count

**Criminal Sale of a Firearm in the Third Degree – PL 265.11(1) [D Violent Fel] – 6 Counts**

(against Jadin Ruth, Counts 109, 111, 121) – 3 Counts

(against Huby Ramkissoon, Counts 147, 149, 150) – 3 Counts

(against Henry Jones, Count 147, 149, 150) – 3 Counts

**Attempted Criminal Sale of a Firearm in the Third Degree – PL 110/265.11(1) [E Violent Fel] – 1 Count**

(against Jadin Ruth, Count 120) – 1 Count

**Criminal Sale of a Firearm in the Third Degree – PL 265.11(2) [D Violent Fel] – 2 Counts**

(against Jadin Ruth, Count 110) – 1 Count

(against Huby Ramkissoon, Count 148) – 1 Count

(against Henry Jones, Count 148) – 1 Count

**Criminal Sale of a Ghost Gun in the Second Degree – PL 265.60(1) [E Fel] – 1 Count**

(against Jadin Ruth, Count 112) – 1 Count

**Criminal Possession of a Weapon in the Second Degree – PL 265.03(3) [C Violent Fel] – 1 Count**

(against Henry Jones, Count 151) – 1 Count  
(against Shawn Hill, Count 151) – 1 Count

**Attempted Criminal Possession of a Weapon in the Second Degree – PL 110/265.03(3) [D Violent Fel] – 1 Count**

(against Jadin Ruth, Count 122) – 1 Count

**Criminal Possession of a Weapon in the Third Degree – PL 265.02(8) [D Violent Fel] – 4 Counts**

(against Jadin Ruth, Counts 114, 123) - 2 Counts  
(against Henry Jones, Count 153, 154) – 2 Counts  
(against Shawn Hill, Count 153, 154) – 2 Counts

**Criminal Possession of a Weapon in the Third Degree – PL 265.02(9) [D Violent Fel] – 1 Count**

(against Jadin Ruth, Count 115) – 1 Count

**Criminal Possession of a Weapon in the Third Degree – PL 265.02(1) [D Fel] – 2 Count**

(against Henry Jones, Count 156) – 1 Count  
(against Shawn Hill, Count 155) – 1 Count

**Criminal Possession of a Firearm – PL 265.01-b(1) [E Fel] – 2 Counts**

(against Jadin Ruth, Count 113) – 1 Count  
(against Shawn Hill, Count 152) – 1 Count  
(against Henry Jones, Count 152) – 1 Count

**Conspiracy in the Fourth Degree – PL 105.10(1) [E Fel] – 1 Count**

(against Huby Ramkissoon, Count 146) – 1 Count  
(against Henry Jones, Count 146) – 1 Count  
(against Shawn Hill, Count 146) – 1 Count

NICOLE KEARY  
Deputy Attorney General  
BY: JASON E. NAVIA  
Assistant Deputy Attorney General  
Organized Crime Task Force  
New York State Office of the Attorney General

**A TRUE BILL**

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FOREPERSON

Dated: November 6, 2024

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS, CRIMINAL TERM

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THE PEOPLE OF THE STATE OF NEW YORK

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DEFENDANTS.

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**COUNT 1**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, SHAWN WILTSHIRE, HAASHIM MCCORKLE, HUBY RAMKISSOON, STANLEY LAUREANO, and CHRISTOPHER MCMILLIAN** of the crime of **CONSPIRACY IN THE SECOND DEGREE**, in violation of § 105.15 of the Penal Law of the State of New York, committed as follows:

On or about and between October 15, 2023 and June 26, 2024 in Kings County, Queens, County, Westchester County, and elsewhere inside the State of New York with intent that conduct constituting the crimes of Criminal Sale of a Controlled Substance in the First Degree, in violation of §220.43(1) of the Penal Law of the State of New York, and/or Criminal Sale of a Controlled Substance in the Second Degree, in violation of §220.41(1) of the Penal Law of the State of New York, and/or Criminal Possession of a Controlled Substance in the First Degree, in violation of § 220.21(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 § 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 individuals known and unknown to engage in and cause the performance of such conduct as would constitute the above-mentioned class A felonies.

### **PREAMBLE**

It was the purpose of this conspiracy to acquire, possess, and sell cocaine and counterfeit oxycodone pills containing fentanyl in quantities of at least one-half ounce or more, and to possess controlled substances in amounts of four ounces or more, in Kings County, Queens County, Westchester County, and elsewhere inside the State of New York, and to collect the proceeds from those controlled substance transactions.

It was the role of **JADIN RUTH** to purchase cocaine and counterfeit oxycodone pills containing fentanyl for resale from **SHAWN WILTSHIRE**.

It was the role of **JADIN RUTH** to purchase cocaine for resale from **HAASHIM MCCORKLE, HUBY RAMKISSOON, and STANLEY LAUREANO**.

It was the role of **HUBY RAMKISSOON and STANLEY LAUREANO** to supply cocaine to **HAASHIM MCCORKLE** for resale to others, including **JADIN RUTH**.

It was the role of **HAASHIM MCCORKLE** to supply cocaine to **JADIN RUTH**, for resale to others, including an individual known to the Grand Jury.

It was the role of **CHRISTOPHER MCMILLIAN** to sell counterfeit oxycodone pills containing fentanyl to an individual known to the Grand Jury.

It was the role of **JADIN RUTH** to sell cocaine and counterfeit oxycodone pills containing fentanyl to an individual known to the Grand Jury.

It was the role of **JADIN RUTH** to obtain United States Currency as the proceeds from the sale of cocaine and counterfeit oxycodone pills containing fentanyl to an individual known to the Grand Jury.

It was also part of this conspiracy for members of the conspiracy to communicate with each other and others over cellular telephones using codes and communicating 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:

1. On or about October 16, 2023, **JADIN RUTH** sent a text message to an individual known to the Grand Jury stating, in sum and substance, “Trying to see bout the pills now. My boy got em but they white and going for 10. Yo im trying to rock it up for u bro cause I got da soft.”
2. On or about October 18, 2023, in Kings County, **JADIN RUTH** sold a quantity of cocaine, weighing in excess of one half of an ounce, to an individual known to the Grand Jury for a sum of United States Currency.
3. On or about October 20, 2023, **JADIN RUTH** sent a text message to an individual known to the Grand Jury stating, in sum and substance, “For the 60. 2100 for everything.”
4. On or about October 24, 2023, **JADIN RUTH** sent a text message to **SHAWN WILTSHIRE**, stating, in sum and substance, “Brook i could grab frm u tonight inna hood or jus slide on u inna morning type shit”, to which **SHAWN WILTSHIRE** replied via text message, in sum and substance, “Yeah. In the morning.”

5. On or about October 25, 2023, in Kings County, **JADIN RUTH** sold a quantity of cocaine, weighing in excess of two ounces, to an individual known to the Grand Jury for a sum of United States Currency.

6. On or about October 28, 2023, **JADIN RUTH** sent a text message to **SHAWN WILTSHIRE** stating, in sum and substance, “So he gon take 60 yams and 100 whites”, to which **SHAWN WILTSHIRE** replied via text message, in sum and substance, “Bet”.

7. On or about and between October 29, 2023 and October 30, 2023, **JADIN RUTH** sent a series of text messages to an individual known to the Grand Jury stating, in sum and substance, “Shit i just locked u in on the order. Got u 60 gs 100 whites?”.

8. On or about November 1, 2023, in Kings County, **JADIN RUTH** sold a quantity of cocaine, weighing in excess of two ounces, to an individual known to the Grand Jury for a sum of United States Currency.

9. On or about November 14, 2023, **JADIN RUTH** sent a text message to **SHAWN WILTSHIRE**, stating, in sum and substance, “Yea bro gon take the 100 on Wednesday with 40 yams”, to which **SHAWN WILTSHIRE**, replied via a series of text messages, stating, in sum and substance, “Almost there pulling things together. I got the 40 grams just waiting on the other. Got everything bro.”

10. On or about November 15, 2023, in Kings County, **JADIN RUTH** sold a quantity of cocaine, weighing in excess of one-half of an ounce, and a quantity of counterfeit oxycodone pills containing fentanyl weighing in excess of one-half of an ounce, to an individual known to the Grand Jury for a sum of United States Currency.



11. On or about and between December 25, 2023 and December 27, 2023, **JADIN RUTH** sent a text message to an individual known to the Grand Jury stating, in sum and substance, “500 pill and 20 yams. Come thru just gimme 4 for the white ion even got enough girl.”

12. On or about December 27, 2023, in Kings County, **JADIN RUTH** sold a quantity of counterfeit pills containing fentanyl, weighing in excess of two ounces, to an individual known to the Grand Jury for a sum of United States Currency.

13. On or about January 10, 2024, **JADIN RUTH** sent a text message to an individual known to the Grand Jury, stating, in sum and substance, “We good on pill checkin food now.”

14. On or about January 12, 2024, in Kings County, **JADIN RUTH** sold a quantity of counterfeit pills containing fentanyl, weighing in excess of two ounces, to an individual known to the Grand Jury for a sum of United States Currency.

15. On or about January 12, 2024, **JADIN RUTH** sent a text message to **SHAWN WILTSHIRE**, stating, in sum and substance, “He cam thru. Imma make a run and u could walk to me broski. Boutta walk to 56 rn.”, to which **SHAWN WILTSHIRE**, replied via text message, “OK I’m getting ready now.”

16. On or about January 30, 2024, **JADIN RUTH** sent a text message to an individual known to the Grand Jury, stating, in sum and substance, “Ight bet imma put inna order from now bro”.

17. On or about February 7, 2024, in Kings County, **JADIN RUTH** sold a quantity of cocaine and counterfeit oxycodone pills containing fentanyl, weighing in excess of two ounces, to an individual known to the Grand Jury for a sum of United States Currency.

18. On or about February 21, 2024, in Kings County, **JADIN RUTH** sold a quantity of cocaine and counterfeit oxycodone pills containing fentanyl, weighing in excess of two ounces, to an individual known to the Grand Jury for a sum of United States Currency.

19. On or about March 3, 2024, in a coded, guarded, and cryptic telephone communication, **HAASHIM MCCORKLE** stated to **JADIN RUTH**, in sum and substance, “I had to chef real quick. But I had to wait for that shit to dry.”

20. On or about March 3, 2024, in a coded, guarded, and cryptic telephone communication, **HAASHIM MCCORKLE** stated, in sum and substance, “I’m outside. Ya heard?”, to which **JADIN RUTH** stated, in sum and substance, “Aight, bet, Unc.”

21. On or about March 4, 2024, in a coded, guarded, and cryptic telephone communication, **SHAWN WILTSHIRE**, stated, in sum and substance, “Nah...nah, definitely for tomorrow dude. We still good?”, to which **JADIN RUTH** stated, in sum and substance, “Yeah, we still good. My boy said he gonna pull up around like twelve, one”.

22. On or about March 5, 2024, in Kings County, **JADIN RUTH** sold a quantity of cocaine and counterfeit oxycodone pills containing fentanyl, weighing in excess of two ounces, to an individual known to the Grand Jury for a sum of United States Currency.

23. On or about March 14, 2024, in Kings County, **JADIN RUTH** sold a quantity counterfeit oxycodone pills containing fentanyl, weighing in excess of two ounces, to an individual known to the Grand Jury for a sum of United States Currency.

24. On or about March 26, 2024, in a coded, guarded, and cryptic telephone communication, **JADIN RUTH** stated, in sum and substance, “Unc, you got some soft though? You got like thirty Gs of that shit though?”, to which **HAASHIM MCCORKLE** stated, in sum and substance, “I got twenty-five.” In the same conversation, **JADIN RUTH** then told **HAASHIM MCCORKLE**, in sum and substance, “I’mma take it.”

25. On or about March 27, 2024, in a coded, guarded, and cryptic telephone communication, **HAASHIM MCCORKLE** stated, in sum and substance to **JADIN RUTH**, “I’m outside, bro”.

26. On or about March 27, 2024, **JADIN RUTH** met **HAASHIM MCCORKLE** in the vicinity of 1690 Ralph Avenue, Kings County.

27. On or about March 28, 2024, in Kings County, **JADIN RUTH** sold a quantity of cocaine, weighing in excess of one half of an ounce, to an individual known to the Grand Jury for a sum of United States Currency.

28. On or about March 30, 2024, in a coded, guarded, and cryptic telephone communication, **HAASHIM MCCORKLE** stated, in sum and substance, “You was dropping a hundo? I was about to say break it into two fifty joints because I hate digging in the fucking bag.”, to which **HUBY RAMKISSOON**, stated, in sum and substance “I got you bro don’t worry about it.”

29. On or about April 5, 2024, in a coded, guarded, and cryptic telephone communication, **HUBY RAMKISSOON** had a telephone conversation, during which, **HUBY RAMKISSOON**, stated, in sum and substance to **HAASHIM MCCORKLE**, “Y-yea my bad son my bad. I got it though son, got you . . . I’mma pull up.”

30. On or about April 5, 2024, in a coded, guarded, and cryptic telephone communication, **HUBY RAMKISSOON**, stated, in sum and substance, “I said one-oh-one avenue, one-oh-one avenue and eight fourth street”, to which **HAASHIM MCCORKLE**, stated, in sum and substance, “Oh ok. I'm sitting in the car by on the hydrant.”

31. On or about April 5, 2024, in Queens County, **HUBY RAMKISSOON** sold 100 grams of cocaine to **HAASHIM MCCORKLE**.

32. On or about April 8, 2024, in a coded, guarded, and cryptic telephone communication, **JADIN RUTH**, stated to an individual known to the Grand Jury, in sum and substance, “Everything, everything. I got in touch with my peoples and all. So we all good for tomorrow. Two hundred on the scale. Good shit.”

33. On or about April 8, 2024, in a coded, guarded, and cryptic telephone communication, **HAASHIM MCCORKLE** stated, in sum and substance, “I’m Gucci, but a move came to me . . . my young nigga need a hundo”, to which **HUBY RAMKISSOON**, stated in sum and substance, “Yeah. I got it over here too . . . we gonna give it to them whole.”

34. On or about April 8, 2024, in Queens County, **HUBY RAMKISSOON** sold 100 grams of cocaine to **HAASHIM MCCORKLE**.

35. On or about April 9, 2024, an individual known to the Grand Jury sent a text message to **JADIN RUTH** stating, in sum and substance, “U got my full order”, to which **JADIN RUTH** replied via text message, in sum and substance, “200 facts”.

36. On or about April 9, 2024, in Kings County, **JADIN RUTH** sold a quantity of cocaine, weighing in excess of two ounces, to an individual known to the Grand Jury for a sum of United States Currency.

37. On or about April 9, 2024, in a coded, guarded, and cryptic telephone communication, **HAASHIM MCCORKLE** stated, in sum and substance, “yo yesterday that was on the um, that the number on that was twenty two?”, to which **HUBY RAMKISSOON** replied in sum and substance, “Yeah.”

38. On or about April 9, 2024, in a coded, guarded, and cryptic telephone communication, **HUBY RAMKISSOON** stated to **HAASHIM MCCORKLE**, in sum and substance, “Callin you now. He already had ya number. Yeah yeah yeah he about to call you.”

39. On or about April 9, 2024, **STANLEY LAUREANO**, sent a series of text messages to **HAASHIM MCCORKLE**, stating, in sum and substance, “Yoo it’s sess bro . . . Hit me when u can so I can stop by and grab that bro.”


40. On or about April 17, 2024, **JADIN RUTH**, sent a multi-media message to an individual known to the Grand Jury depicting a clear Ziplock bag with a quantity of white pills.

41. On or about April 17, 2024, **JADIN RUTH**, sent a text message to an individual known to the Grand Jury stating, in sum and substance, “He asked if u want all 940 that’s what left.”

42. On or about April 18, 2024, in Kings County, **JADIN RUTH** and **CHRISTOPER MCMILLIAN**, sold a quantity of counterfeit oxycodone pills containing fentanyl, weighing in excess of two ounces, to an individual known to the Grand Jury for a sum of United States Currency.

43. On or about April 18, 2024, in a coded, guarded, and cryptic telephone communication, **JADIN RUTH**, stated, in sum and substance, “I could meet you on um fifty-six. I got thirty one sixteen for you. Everything good. I’m counting.”, to which **SHAWN WILTSHIRE**, stated, in sum and substance, “I mean just do the math.”

44. On or about April 18, 2024, in Kings County, **SHAWN WILTSHIRE** and **JADIN RUTH**, met inside of a store located at 5604 Avenue H, Brooklyn, NY and **JADIN RUTH** handed **SHAWN WILTSHIRE** a sum of United States Currency.

45. On or about April 29, 2024, **JADIN RUTH**, sent a text message to **SHAWN WILTSHIRE**, stating, in sum and substance, “1000  Wednesday? Don’t say nun.”

46. On or about May 2, 2024, **SHAWN WILTSHIRE** sent a text message to **JADIN RUTH**, stating, in sum and substance, “Nah those is 6”.

47. On or about May 2, 2024, **JADIN RUTH** sent a text message to an individual known to the Grand Jury, stating, in sum and substance, “Macc got 600 pills in the tuck i got 100 yams left feel me we tried running around getting more”.

48. On or about May 3, 2024, in Kings County, **JADIN RUTH** sold a quantity of counterfeit oxycodone pills containing fentanyl, weighing in excess of two ounces, to an individual known to the Grand Jury for a sum of United States Currency.

49. On or about May 3, 2024, **JADIN RUTH** met **SHAWN WILTSHIRE** in front of 1690 Ralph Avenue, Kings County.

50. On or about May 8, 2024, in a coded, guarded, and cryptic telephone communication, **JADIN RUTH**, stated, in sum and substance, “Yeah, Unc. They said they gone take the hundo today,” to which **HAASHIM MCCORKLE**, stated, in sum and substance, “Aight, cool. Aight, so lemme make these calls so these niggas can be on point.”

51. On or about May 8, 2024, in a coded, guarded, and cryptic telephone communication, **HAASHIM MCCORKLE**, stated, in sum and substance, “I need that hundo baby”, to which **HUBY RAMKISSOON**, stated, in sum and substance, “I got you bro. Just be a lil patient with ya boy. I got you. You got the money? Listen, yeah, listen, you need to tell them niggas to give you the money.”

52. On or about May 8, 2024, in a coded, guarded, and cryptic telephone communication, **HUBY RAMKISSOON**, stated to **HAASHIM MCCORKLE**, in sum and substance, “I’m coming, I’m coming to ya crib nigga. Have mine on deck cause I ain’t got time.”

53. On or about May 8, 2024, in a coded, guarded, and cryptic telephone communication, **HUBY RAMKISSOON**, stated, in sum and substance, “I’m going to grab that, you heard? I’m going to grab that, and have it”, to which **HAASHIM MCCORKLE**, stated, in sum and substance, “You’re going to have that, so I’m going to make sure these niggas have the bread.”

54. On or about May 8, 2024, **HAASHIM MCCORKLE**, **STANLEY LAUREANO**, and **HUBY RAMKISSOON** met outside of **HAASHIM MCCORKLE’S** residence in Kings County.

**STANLEY LAUREANO** then drove **HAASHIM MCCORKLE** to the vicinity of **JADIN'S RUTH** residence, located at 1690 Ralph Avenue, Kings County.

55. On or about May 8, 2024, in Kings County, **JADIN RUTH** met with **HAASHIM MCCORKLE** and **STANLEY LAUREANO** inside of **STANLEY LAUREANO's** vehicle.

56. On or about May 8, 2024, in Kings County, **JADIN RUTH** sold a quantity of cocaine, weighing in excess of two ounces, to an individual known to the Grand Jury for a sum of United States Currency.

57. On or about May 28, 2024, in Kings County, **JADIN RUTH** sold a quantity of cocaine, weighing in excess of two ounces, to an individual known to the Grand Jury for a sum of United States Currency.

58. On or about May 28, 2024, **JADIN RUTH**, sent a text message to **SHAWN WILTSHIRE**, stating, in sum and substance, "He just came thru bro my fault im boutta charge my phone for 10 minutes and imma meet u", to which **SHAWN WILTSHIRE**, replied via text message, in sum and substance, "Cool".

59. On or about June 12, 2024, in Queens County, inside of **STANLEY LAUREANO's** vehicle, **HUBY RAMKISSOON** stated, in sum and substance, "You put the work in here?", to which **STANLEY LAUREANO** replied "Yeah."

60. On or about June 12, 2024, in Westchester County, inside of **STANLEY LAUREANO's** vehicle, **STANLEY LAUREANO** stated, in sum and substance, "I thought I was going to get a whole brick of coke . . . They gave me half. I charged the nigga twenty eight, he's meeting me at the Outlets in the morning at ten o'clock to cash me out and he owes me four thousand dollars. He was holding on to my money until I gave him work."

61. On or about June 13, 2024, in Westchester County, **STANLEY LAUREANO** was in possession of a quantity of cocaine, weighing in excess of eight ounces.

62. On or about June 13, 2024, in a coded, guarded, and cryptic telephone communication, **STANLEY LAUREANO** stated, in sum and substance, “Bro I can't come over there bro. I--can't come over there bro. You gotta clean up the crib son and apart from cleaning up the crib son you can't even do it yourself right now cuz I don't even know if they watching us nigga. It's bad.”

63. On or about June 13, 2024, in a coded, guarded, and cryptic telephone communication, **HUBY RAMKISSOON**, stated to **HAASHIM MCCORKLE**, in sum and substance, “If there's anything in your crib, get it out your crib. ASAP. Bro, got jammed up. I wanna make sure you're clear bro. I'm gonna get back with you in a minute.”

64. On or about June 25, 2024, **SHAWN WILTSHIRE**, sent a text message to **JADIN RUTH**, stating, in sum and substance, “We still on with the yams”, to which **JADIN RUTH**, stated, in sum and substance, “Copy so yea he just gon grab the 50 joints”.

65. On or about June 26, 2024, in Kings County, **JADIN RUTH** sold a quantity of cocaine, to an individual known to the Grand Jury for a sum of United States Currency.

## **COUNT 2**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, HAASHIM MCCORKLE, HUBY RAMKISSOON, and STANLEY LAUREANO** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about May 8, 2024, in Kings County, Queens County, and elsewhere inside the State of New York, did knowingly and



unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

**COUNT 3**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, HAASHIM MCCORKLE, HUBY RAMKISSOON, and STANLEY LAUREANO** 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 and others, on or about May 8, 2024, in Kings County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 4**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, HAASHIM MCCORKLE, HUBY RAMKISSOON, STANLEY LAUREANO** 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 and others, on or about May 8, 2024, in Kings County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

**COUNT 5**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, HAASHIM MCCORKLE, HUBY RAMKISSOON, and STANLEY LAUREANO** 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 and others, on or about May 8, 2024, in Kings County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

**COUNT 6**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, HAASHIM MCCORKLE, HUBY RAMKISSOON, and STANLEY LAUREANO** 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 and others, on or about May 8, 2024, in Kings County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 7**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, HAASHIM MCCORKLE, HUBY RAMKISSOON, and STANLEY**

**LAUREANO** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between April 5, 2024 and April 9, 2024, in Kings County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

**COUNT 8**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, HAASHIM MCCORKLE, HUBY RAMKISSOON, and STANLEY LAUREANO** 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 and others, on or about and between April 5, 2024 and April 9, 2024, in Kings County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 9**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, HAASHIM MCCORKLE, HUBY RAMKISSOON, and STANLEY LAUREANO** 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 and others, on or about and between April 5, 2024 and April 9, 2024, in Kings County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

**COUNT 10**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, HAASHIM MCCORKLE, HUBY RAMKISSOON, and STANLEY LAUREANO** 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 defendants, acting in concert with each other and others, on or about and between April 5, 2024 and April 9, 2024, in Kings County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

**COUNT 11**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, HAASHIM MCCORKLE, HUBY RAMKISSOON, and STANLEY LAUREANO** 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 and others, on or about and between April 5, 2024 and April 9, 2024, in Kings County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

**COUNT 12**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, HAASHIM MCCORKLE, HUBY RAMKISSOON, and STANLEY LAUREANO** 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 and others, on or about and between April 5, 2024 and April 9, 2024, in Kings County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 13**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **HUBY RAMKISSOON and STANLEY LAUREANO** of the crime of **ATTEMPTED CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 110.00/220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between June 12, 2024 and June 13, 2024, in Westchester County, Queens County, and elsewhere inside

the State of New York, did knowingly and unlawfully attempt to sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

**COUNT 14**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **HUBY RAMKISSOON and STANLEY LAUREANO** of the crime of **ATTEMPTED CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 110.00/220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between June 12, 2024 and June 13, 2024, in Westchester County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully attempt to sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 15**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **HUBY RAMKISSOON and STANLEY LAUREANO** of the crime of **ATTEMPTED CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 110.00/220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between June 12, 2024 and June 13, 2024, in Westchester County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully attempt sell a narcotic drug, to wit: cocaine.

**COUNT 16**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **HUBY RAMKISSOON and STANLEY LAUREANO** of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between June 12, 2024 and June 13, 2024, in Westchester County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

**COUNT 17**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **HUBY RAMKISSOON and STANLEY LAUREANO** 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 defendants, acting in concert with each other and others, on or about and between June 12, 2024 and June 13, 2024, in Westchester County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said

preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

**COUNT 18**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **HUBY RAMKISSOON and STANLEY LAUREANO** 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 and others, on or about and between June 12, 2024 and June 13, 2024, in Westchester County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

**COUNT 19**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **HUBY RAMKISSOON and STANLEY LAUREANO** 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 and others, on or about and between June 12, 2024 and June 13, 2024, in Westchester County, Queens County, and elsewhere inside the State of New York, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.



**COUNT 20**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and HAASHIM MCCORKLE** 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 and others, on or about and between March 27, 2024 and March 28, 2024, in Kings County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 21**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and HAASHIM MCCORKLE** 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 and others, on or about and between March 27, 2024 and March 28, 2024, in Kings County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

**COUNT 22**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and HAASHIM MCCORKLE** 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 and others, on or about and between March 27, 2024 and March 28, 2024, in Kings County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

**COUNT 23**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and HAASHIM MCCORKLE** 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 and others, on or about and between March 27, 2024 and March 28, 2024, in Kings County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 24**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and HAASHIM MCCORKLE** 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 and others, on or about and between March 4, 2024 and March 5, 2024, in Kings County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 25**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and HAASHIM MCCORKLE** 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 and others, on or about and between March 4, 2024 and March 5, 2024, in Kings County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

**COUNT 26**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and HAASHIM MCCORKLE** 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 and others, on or about and between March 4, 2024 and March 5, 2024, in Kings County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

**COUNT 27**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and HAASHIM MCCORKLE** 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 and others, on or about and between March 4, 2024 and March 5, 2024, in Kings County, did knowingly and unlawfully possess one

or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 28**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 4, 2024 and March 5, 2024, in Kings 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 two ounces or more.

**COUNT 29**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between March 4, 2024 and March 5, 2024, in Kings 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.

**COUNT 30**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between March 4, 2024 and March 5, 2024, in Kings County, did knowingly and unlawfully sell a narcotic drug.

**COUNT 31**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 defendants, acting in concert with each other and others, on or about and between March 4, 2024 and March 5, 2024, in Kings 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.

**COUNT 32**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between March 4, 2024 and March 5, 2024, in Kings County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.

**COUNT 33**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between March 4, 2024 and March 5, 2024, in Kings 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.

**COUNT 34**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, SHAWN WILTSHIRE, and CHRISTOPHER MCMILLIAN** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between April 16, 2024 and April 18, 2024, in Kings 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 two ounces or more.

**COUNT 35**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, SHAWN WILTSHIRE, and CHRISTOPHER MCMILLIAN** 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 and others, on or about and between April 16, 2024 and April 18, 2024, in Kings 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.

**COUNT 36**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, SHAWN WILTSHIRE, and CHRISTOPHER MCMILLIAN** 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 and others, on or about and between April 16, 2024 and April 18, 2024, in Kings County, did knowingly and unlawfully sell a narcotic drug.

**COUNT 37**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, SHAWN WILTSHIRE, and CHRISTOPHER MCMILLIAN** of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST**

**DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between April 16, 2024 and April 18, 2024, in Kings 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 eight ounces or more.

**COUNT 38**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, SHAWN WILTSHIRE, and CHRISTOPHER MCMILLIAN** 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 defendants, acting in concert with each other and others, on or about and between April 16, 2024 and April 18, 2024, in Kings 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.

**COUNT 39**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, SHAWN WILTSHIRE, and CHRISTOPHER MCMILLIAN** 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 and others, on or about and between April 16, 2024 and April 18, 2024, in Kings County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.

**COUNT 40**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH, SHAWN WILTSHIRE, and CHRISTOPHER MCMILLIAN** 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 and others, on or about and between April 16, 2024 and April 18, 2024, in Kings 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.

**COUNT 41**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between April 26, 2024 and May 3, 2024, in Kings 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 two ounces or more.

**COUNT 42**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between April 26, 2024 and May 3, 2024, in Kings 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.

**COUNT 43**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between April 26, 2024 and May 3, 2024, in Kings County, did knowingly and unlawfully sell a narcotic drug.

**COUNT 44**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between April 26, 2024 and May 3, 2024, in Kings County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.

**COUNT 45**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between April 26, 2024 and May 3, 2024, in Kings 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.

**COUNT 46**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 13, 2024 and March 14, 2024, in Kings 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 two ounces or more.

**COUNT 47**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between March 13, 2024 and March 14, 2024, in Kings 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.

**COUNT 48**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between March 13, 2024 and March 14, 2024, in Kings County, did knowingly and unlawfully sell a narcotic drug.

**COUNT 49**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** of the crime of **CRIMINAL POSSESSION OF A**

**CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between March 13, 2024 and March 14, 2024, in Kings 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 eight ounces or more.

**COUNT 50**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 defendants, acting in concert with each other and others, on or about and between March 13, 2024 and March 14, 2024, in Kings 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.

**COUNT 51**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between March 13, 2024 and March 14, 2024, in Kings County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.

**COUNT 52**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between March 13, 2024 and March 14, 2024, in Kings 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.

**COUNT 53**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between January 10, 2024 and January 12, 2024, in Kings 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 two ounces or more.

**COUNT 54**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between January 10, 2024 and January 12, 2024, in Kings 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.

**COUNT 55**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between January 10, 2024 and January 12, 2024, in Kings County, did knowingly and unlawfully sell a narcotic drug.

**COUNT 56**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between January 10, 2024 and January 12, 2024, in Kings 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 eight ounces or more.

**COUNT 57**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 defendants, acting in concert with each other and others, on or about and between January 10, 2024 and January 12, 2024, in Kings 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.

**COUNT 58**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between January 10, 2024 and January 12, 2024, in Kings County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.



**COUNT 59**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between January 10, 2024 and January 12, 2024, in Kings 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.

**COUNT 60**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between December 25, 2023 and December 27, 2023, in Kings 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 two ounces or more.

**COUNT 61**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between December 25, 2023 and December 27, 2023, in Kings 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.

**COUNT 62**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between December 25, 2023 and December 27, 2023, in Kings County, did knowingly and unlawfully sell a narcotic drug.

**COUNT 63**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between December 25, 2023 and December 27, 2023, in Kings 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 eight ounces or more.

**COUNT 64**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 defendants, acting in concert with each other and others, on or about and between December 25, 2023 and December 27, 2023, in Kings 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.

**COUNT 65**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between December 25, 2023 and December 27, 2023, in Kings County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.

**COUNT 66**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between December 25, 2023 and December 27, 2023, in Kings 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.

**COUNT 67**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between December 3, 2023 and December 5, 2023, in Kings 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.

**COUNT 68**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between December 3, 2023 and December 5, 2023, in Kings County, did knowingly and unlawfully sell a narcotic drug.

**COUNT 69**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between December 3, 2023 and December 5, 2023, in Kings County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.

**COUNT 70**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between December 3, 2023 and December 5, 2023, in Kings 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.

**COUNT 71**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between November 17, 2023 and November 20, 2023, in Kings 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 two ounces or more.

**COUNT 72**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between November 17, 2023 and November 20, 2023, in Kings 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.

**COUNT 73**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between November 17, 2023 and November 20, 2023, in Kings County, did knowingly and unlawfully sell a narcotic drug.

**COUNT 74**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between November 17, 2023 and November 20, 2023, in Kings County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.

**COUNT 75**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between November 17, 2023 and November 20, 2023, in Kings 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.

**COUNT 76**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between November 27, 2023 and November 29, 2023, in Kings 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 two ounces or more.

**COUNT 77**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between November 27, 2023 and November 29, 2023, in Kings 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.

**COUNT 78**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between November 27, 2023 and November 29, 2023, in Kings County, did knowingly and unlawfully sell a narcotic drug.

**COUNT 79**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between November 27, 2023 and November 29, 2023, in Kings County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.

**COUNT 80**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between November 27, 2023 and November 29, 2023, in Kings 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.

**COUNT 81**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between November 13, 2023 and November 15, 2023, in Kings 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 two ounces or more.

**COUNT 82**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between November 13, 2023 and November 15, 2023, in Kings 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.

**COUNT 83**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between November 13, 2023 and November 15, 2023, in Kings County, did knowingly and unlawfully sell a narcotic drug.

**COUNT 84**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between November 13, 2023 and November 15, 2023, in Kings County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.

**COUNT 85**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between November 13, 2023 and November 15, 2023, in Kings 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.

**COUNT 86**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between October 27, 2023 and November 1, 2023, in Kings County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

**COUNT 87**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between October 27, 2023 and November 1, 2023, in Kings County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 88**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between October 27, 2023 and November 1, 2023, in Kings County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

**COUNT 89**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between October 27, 2023 and November 1, 2023, in Kings County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

**COUNT 90**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between October 27, 2023 and November 1, 2023, in Kings County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 91**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between October 20, 2023 and October 25, 2023, in Kings County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

**COUNT 92**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between October 20, 2023 and October 25, 2023, in Kings County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 93**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between October 20, 2023 and October 25, 2023, in Kings County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

**COUNT 94**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between October 20, 2023 and October 25, 2023, in Kings County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

**COUNT 95**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between October 20, 2023 and October 25, 2023, in Kings County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 96**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between June 25, 2024 and June 26, 2024, in Kings County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 97**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between June 25, 2024 and June 26, 2024, in Kings County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

**COUNT 98**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between June 25, 2024 and June 26, 2024, in Kings County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

**COUNT 99**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between June 25, 2024 and June 26, 2024, in Kings County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 100**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between October 15, 2023 and October 18, 2023, in Kings County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 101**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between October 15, 2023 and October 18, 2023, in Kings County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

**COUNT 102**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between October 15, 2023 and October 18, 2023, in Kings County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

**COUNT 103**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between October 15, 2023 and October 18, 2023, in Kings County, did knowingly and unlawfully possess

one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 104**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between May 24, 2024 and May 28, 2024, in Kings County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

**COUNT 105**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between May 24, 2024 and May 28, 2024, in Kings County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 106**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between May 24, 2024 and May 28, 2024, in Kings County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

**COUNT 107**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between May 24, 2024 and May 28, 2024, in Kings County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

**COUNT 108**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **JADIN RUTH and SHAWN WILTSHIRE** 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 and others, on or about and between May 24, 2024 and May 28, 2024, in Kings County, did knowingly and unlawfully possess one or

more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 109**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between May 24, 2024 and May 28, 2024, in Kings County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9-millimeter Polymer-80 pistol (NYPD Lead Seal No. 187159).

**COUNT 110**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of Section 265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between May 24, 2024 and May 28, 2024, in Kings County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: one 9-millimeter Polymer-80 pistol (NYPD Lead Seal No. 187159), with intent to sell it.

**COUNT 111**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between May 24, 2024 and May 28, 2024, in Kings County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 3001752103), with a capacity of more than ten rounds of ammunition.

**COUNT 112**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of Section 265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between May 24, 2024 and May 28, 2024, in Kings County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: a 9-millimeter Polymer-80 pistol (NYPD Lead Seal No. 187159).

**COUNT 113**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows

Said defendant, on or about and between May 24, 2024 and May 28, 2024, in Kings County, did possess a firearm, to wit: a 9-millimeter Polymer-80 pistol (NYPD Lead Seal No. 187159).

**COUNT 114**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between May 24, 2024 and May 28, 2024, in Kings County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 3001752103), with a capacity of more than ten rounds of ammunition.

**COUNT 115**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(9) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between May 24, 2024 and May 28, 2024, in Kings County, did possess an unloaded firearm, to wit: a 9-millimeter semi-automatic Polymer-80 pistol (NYPD Lead Seal No. 187159), while also committing the crime of Criminal Sale of a Controlled Substance in the Third Degree, in violation of Penal Law Section 220.39(1), said crime being a drug trafficking felony.

**COUNT 116**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 defendant, on or about and between December 28, 2023 and January 5, 2024, in Kings County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 117**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between December 28, 2023 and January 5, 2024, in Kings County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

**COUNT 118**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between December 28, 2023 and January 5, 2024, in Kings County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

**COUNT 119**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between December 28, 2023 and January 5, 2024, in Kings County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 120**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of Section 110.00/265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between December 28, 2023 and January 5, 2024, in Kings County, while not authorized pursuant to law to possess a firearm, did attempt to unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9-millimeter Jennings Firearms Bryco 59 pistol (Serial Number 1048249).

**COUNT 121**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between December 28, 2023 and January 5, 2024, in Kings County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 3001684103), with a capacity of more than ten rounds of ammunition.

**COUNT 122**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 110.00/265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between December 28, 2023 and January 5, 2024, in Kings County, did attempt to possess a loaded firearm, to wit: one 9-millimeter Jennings Firearms Bryco 59 pistol (Serial Number 1048249), and said possession took place outside the defendant's home or place of business.

The subject matter of this count is an Armed Felony as that term is defined in Section 1.20 of the Criminal Procedure Law.

**COUNT 123**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between December 28, 2023 and January 5, 2024, in Kings County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 3001684103), with a capacity of more than ten rounds of ammunition.

**COUNT 124**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between February 16, 2024 and February 21, 2024, in Kings 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 two ounces or more.

**COUNT 125**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 defendant, on or about and between February 16, 2024 and February 21, 2024, in Kings 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.

**COUNT 126**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between February 16, 2024 and February 21, 2024, in Kings County, did knowingly and unlawfully sell a narcotic drug.

**COUNT 127**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between February 16, 2024 and February 21, 2024, in Kings 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.

**COUNT 128**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between February 16, 2024 and February 21, 2024, in Kings County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.

**COUNT 129**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between February 16, 2024 and February 21, 2024, in Kings 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.

**COUNT 130**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between January 30, 2024 and February 7, 2024, in Kings 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 two ounces or more.

**COUNT 131**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 defendant, on or about and between January 30, 2024 and February 7, 2024, in Kings 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.

**COUNT 132**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between January 30, 2024 and February 7, 2024, in Kings County, did knowingly and unlawfully sell a narcotic drug.

**COUNT 133**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between January 30, 2024 and February 7, 2024, in Kings 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.

**COUNT 134**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between January 30, 2024 and February 7, 2024, in Kings County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.

**COUNT 135**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between January 30, 2024 and February 7, 2024, in Kings 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.

**COUNT 136**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between January 23, 2024 and January 25, 2024, in Kings 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 two ounces or more.

**COUNT 137**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 defendant, on or about and between January 23, 2024 and January 25, 2024, in Kings 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.

**COUNT 138**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between January 23, 2024 and January 25, 2024, in Kings County, did knowingly and unlawfully sell a narcotic drug.

**COUNT 139**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between January 23, 2024 and January 25, 2024, in Kings County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.

**COUNT 140**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between January 23, 2024 and January 25, 2024, in Kings 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.

**COUNT 141**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between December 11, 2023 and December 13, 2023, in Kings 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 two ounces or more.

**COUNT 142**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 defendant, on or about and between December 11, 2023 and December 13, 2023, in Kings 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.

**COUNT 143**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between December 11, 2023 and December 13, 2023, in Kings County, did knowingly and unlawfully sell a narcotic drug.

**COUNT 144**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between December 11, 2023 and December 13, 2023, in Kings County, did knowingly and unlawfully possess a narcotic drug, with intent to sell it.

**COUNT 145**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **JADIN RUTH** 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 and between December 11, 2023 and December 13, 2023, in Kings 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.

**COUNT 146**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **HUBY RAMKISSOON, HENRY JONES a/k/a HENRY JAMES, and SHAWN HILL**, of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Section 105.10(1) of the Penal Law of the State of New York, committed as follows:

On or about and between June 2, 2024 and June 3, 2024 in Kings County, with intent that conduct constituting the crime of Criminal Possession of a Weapon in the Second Degree, in violation of Section 265.03(3) of the Penal Law of the State of New York, said crime being a class C felony, 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 the above-mentioned class C felony.

**PREAMBLE**

It was the purpose of this conspiracy to obtain, possess, control, and transport a firearm in Kings County, and to collect the proceeds from the sale of that firearm.

It was the role of **HUBY RAMKISSOON** to arrange for the possession and sale of a loaded firearm to **SHAWN HILL**, from **HENRY JONES a/k/a HENRY JAMES**.

It was the role of **HENRY JONES a/k/a HENRY JAMES** to possess and sell a loaded firearm to **SHAWN HILL**.

It was the role of **SHAWN HILL** to possess a loaded firearm.

It was also part of this conspiracy for members of the conspiracy to communicate with each other and others over cellular telephones using codes and communicating 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:

1. On June 2, 2024, in a coded, guarded, and cryptic telephone communication, **HUBY RAMKISSOON**, stated in sum and substance to **SHAWN HILL**, “I’m gonna make sure everything, everything. I’m gonna come and pull up on you.”

2. On June 3, 2024, in a coded, guarded, and cryptic telephone communication, **SHAWN HILL**, stated in sum and substance, “I can head there now? Alright, you told him?”, to which **HUBY RAMKISSOON**, stated in sum an substance, “Yeah, he already know. You just pull up.”

3. On June 3, 2024, in a coded, guarded, and cryptic telephone communication, **SHAWN HILL**, stated in sum and substance, “I’m on the block. What was the number again?”, to which **HUBY RAMKISSOON**, stated in sum an substance. “Seventeen-o-two. It’s crazy. Just give him a few minutes, son he just around the corner.”

4. On June 3, 2024, in a coded, guarded, and cryptic telephone communication, **HUBY RAMKISSOON**, stated in sum and substance to **SHAWN HILL**, “Just went in the crib to grab that for you. You see him with the red shirt, white hat?”

5. On June 3, 2024, in a coded, guarded, and cryptic telephone communication, **HUBY RAMKISSOON**, stated in sum and substance, “He walking towards you now, son. You see him? Red shirt, white hat.”, to which **SHAWN HILL**, stated, in sum and substance, “Nah, I’m right in front of the building.”

6. On June 3, 2024, in Kings County, **HENRY JONES a/k/a HENRY JAMES** sold one loaded 9-millimeter Taurus G3 pistol (Serial No. 187159), with two large capacity ammunition feeding devices, all of which were contained within a green bag, to **SHAWN HILL**.

7. On June 3, 2024, in Kings County, **SHAWN HILL**, while attempting to evade members of law enforcement, threw from a blue Honda CRV a green bag, which contained one loaded 9-millimeter Taurus G3 pistol (Serial No. 187159), with two large capacity ammunition feeding devices.

8. On June 3, 2024, in a coded, guarded, and cryptic telephone communication, **HUBY RAMKISSOON**, stated in sum and substance to **HAASHIM MCCORKLE**, “Nah remember I had told you I got that other joint. I was passing right off to son, right, so he went to my man crib to go get it, right, and son pass Sike the joint and then when Sike pulled off the block them people got right behind him son. Nah it wasn’t no twerk, it was the slammer, son.”

**COUNT 147**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **HUBY RAMKISSOON and HENRY JONES a/k/a HENRY JAMES** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between June 2, 2024 and June 3, 2024, in Kings County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9-millimeter Taurus G3 pistol (Serial No. 187159).

**COUNT 148**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **HUBY RAMKISSOON and HENRY JONES a/k/a HENRY JAMES** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of Section 265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between June 2, 2024 and June 3, 2024, in Kings County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: one 9-millimeter Taurus G3 pistol (Serial No. 187159), with intent to sell it.

**COUNT 149**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **HUBY RAMKISSOON and HENRY JONES a/k/a HENRY JAMES** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between June 2, 2024 and June 3, 2024, in Kings County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 3001754994, Lab Item No. 2), with a capacity of more than ten rounds of ammunition.

**COUNT 150**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **HUBY RAMKISSOON and HENRY JONES a/k/a HENRY JAMES** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between June 2, 2024 and June 3, 2024, in Kings County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 3001754994, Lab Item No. 4), with a capacity of more than ten rounds of ammunition.

**COUNT 151**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **SHAWN HILL and HENRY JONES a/k/a HENRY JAMES** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between June 2, 2024 and June 3, 2024, in Kings County, did possess a loaded firearm, to wit: one loaded 9-millimeter Taurus G3 pistol (Serial No. 187159), and said possession took place outside the defendant's home or place of business.

The subject matter of this count is an Armed Felony as that term is defined in Section 1.20 of the Criminal Procedure Law.

**COUNT 152**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **SHAWN HILL and HENRY JONES a/k/a HENRY JAMES** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows

Said defendants, acting in concert with each other and others, on or about and between June 2, 2024 and June 3, 2024, in Kings County, did possess a firearm, to wit: a 9-millimeter Taurus G3 pistol (Serial No. 187159).

**COUNT 153**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **SHAWN HILL and HENRY JONES a/k/a HENRY JAMES** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about and between June 2, 2024 and June 3, 2024, in Kings County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 3001754994, Lab Item No. 2), with a capacity of more than ten rounds of ammunition.

**COUNT 154**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants, **SHAWN HILL and HENRY JONES a/k/a HENRY JAMES** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:



Said defendants, acting in concert with each other and others, on or about and between June 2, 2024 and June 3, 2024, in Kings County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 3001754994, Lab Item No. 4), with a capacity of more than ten rounds of ammunition.

**COUNT 155**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **SHAWN HILL** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between June 2, 2024 and June 3, 2024, in Kings County, did possess a firearm, to wit: a 9-millimeter Taurus G3 pistol (Serial No. 187159).

(continued on next page)

**COUNT 156**

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendant, **HENRY JONES a/k/a HENRY JAMES** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between June 2, 2024 and June 3, 2024, in Kings County, did possess a firearm, to wit: a 9-millimeter Taurus G3 pistol (Serial No. 187159).

Date: November 6, 2024  
Kings, County, New York

NICOLE KEARY  
Deputy Attorney General  
Organized Crime Task Force

By: \_\_\_\_\_  
JASON NAVIA, ESQ.  
Assistant Deputy Attorney General  
Organized Crime Task Force  
New York State Office of the Attorney General

A TRUE BILL

\_\_\_\_\_  
FOREPERSON  
Dated: November 6, 2024

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**STANLEY LAUREANO**

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Count 2 – PL § 220.43(1)  
Count 3 – PL § 220.41(1)  
Count 4 – PL § 220.39(1)  
Count 5 – PL § 220.16(1)  
Count 6 – PL § 220.16(12)  
Count 7 – PL § 220.43(1)  
Count 8 – PL § 220.41(1)  
Count 9 – PL § 220.39(1)  
Count 10 – PL § 220.18(1)  
Count 11 – PL § 220.16(1)  
Count 12 – PL § 220.16(12)  
Count 13 – PL § 110.00/220.43(1)  
Count 14 – PL § 110.00/220.41(1)  
Count 15 – PL § 110.00/220.39(1)  
Count 16 – PL § 220.21(1)  
Count 17 – PL § 220.18(1)  
Count 18 – PL § 220.16(1)  
Count 19 – PL § 220.16(12)

**CHRISTOPHER MCMILLIAN**

Count 1 – PL § 105.15  
Count 34 – PL § 220.43(1)  
Count 35 – PL § 220.41(1)  
Count 36 – PL § 220.39(1)  
Count 37 – PL § 220.21(1)  
Count 38 – PL § 220.18(1)  
Count 39 – PL § 220.16(1)

Count 40 – PL § 220.16(12)  
Count 146 – PL § 105.10(1)  
Count 147 – PL § 265.11(1)  
Count 148 – PL § 265.11(2)  
Count 149 – PL § 265.11(1)  
Count 150 – PL § 265.11(1)

**SHAWN HILL**

Count 146 – PL § 105.10(1)  
Count 151 – PL § 265.03(3)  
Count 152 – PL § 265.01-b(1)  
Count 153 – PL § 265.02(8)  
Count 154 – PL § 265.02(8)  
Count 155 – PL § 265.02(1)

**HENRY JONES**

Count 146 – PL § 105.10(1)  
Count 147 – PL § 265.11(1)  
Count 148 – PL § 265.11(2)  
Count 149 – PL § 265.11(1)  
Count 150 – PL § 265.11(1)  
Count 151 – PL § 265.03(3)  
Count 152 – PL § 265.01-b(1)  
Count 153 – PL § 265.02(8)  
Count 154 – PL § 265.02(8)  
Count 156 – PL § 265.02(1)