

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

-----X
THE PEOPLE OF THE STATE OF NEW YORK

-against-

QUEENS COUNTY
INDICTMENT NO.
72800/24

- X. SATVEER SAINI (a.k.a. "SAV");
- X. MATEO CASTRO-AGUDELO (a.k.a. "MATTPERCZ");
- X. HARGENY FERNANDEZ-GONZALEZ;
- X. ADAM YOUSSEF SENHAJI-RIVAS (a.k.a. "BANDO");
- X. MILANJIT SIDHU

DEFENDANTS.

-----X

COUNT 1

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ, ADAM YOUSSEF SENHAJI-RIVAS, and MILANJIT SIDHU** of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of § 105.10(1) of the Penal Law of the State of New York, committed as follows:

On or about and between December 12, 2023 and June 6, 2024 in Queens County, Nassau County, and elsewhere inside and outside the State of New York, including the State of Indiana, with intent that conduct constituting the crime of Criminal Sale of a Firearm in the First Degree, in violation of Section 265.13(2), said crime being a class B 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 B felony.

PREAMBLE

It was the purpose of this conspiracy to obtain, assemble, possess, control, sell and transport firearms in Queens County, Nassau County, the State of Indiana, and elsewhere inside and outside the State of New York, and to collect the proceeds from the sale of those firearms.

It was the role of **SATVEER SAINI, MATEO CASTRO-AGUDELO,** and **ADAM YOUSSEF SENHAJI-RIVAS** to obtain, possess, and transport firearms and accessories, and sell firearms and accessories to others.

It was the role of **HARGENY FERNANDEZ-GONZALEZ** to obtain, possess, and transport firearms from Nassau County to Queens County.

It was the role of **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ,** and **ADAM YOUSSEF SENHAJI-RIVAS** to transfer funds to purchase and possess firearms from the State of Indiana and to ultimately sell firearms in Queens County.

It was the role of **MILANJIT SIDHU** to obtain, possess, and transport firearms from the State of Indiana to Queens County.

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 December 12, 2023, **HARGENY FERNANDEZ-GONZALEZ** transferred \$3,010 to a co-conspirator, who is known to the Grand Jury.
2. On or about December 16, 2023, in Medina County, Ohio, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** knowingly possessed nine firearms.
3. On or about January 31, 2024, in Queens County, **SATVEER SAINI** sold two ghost gun firearms, magazines, and ammunition, to an individual known to the Grand Jury.

4. On or about February 7, 2024, **SATVEER SAINI** sent the following text message to an individual known to the Grand Jury: “My plugs taking from me 8,000”.
5. On or about February 9, 2024, **MATEO CASTRO-AGUDELO** transported **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ**, and a quantity of firearms to the vicinity of 24-47 83rd Street in Queens County.
6. On or about February 9, 2024, in Queens County, **SATVEER SAINI** stated to an individual known to the Grand Jury, in sum and substance: “It’s gonna take like at least two weeks, and then on top of that, one more week, because he gotta go to the gun stores and he gotta go get it . . . this is like 12 hours away, in Indiana.”
7. On or about February 19, 2024, **ADAM YOUSSEF SENHAJI-RIVAS** transferred \$2,000 to a co-conspirator, who is known to the Grand Jury.
8. On or about February 19, 2024, **HARGENY FERNANDEZ-GONZALEZ** transferred \$1,000 to a co-conspirator, who is known to the Grand Jury.
9. On or about February 19, 2024, **SATVEER SAINI** transferred \$2,080 to a co-conspirator, who is known to the Grand Jury.
10. On or about February 21, 2024, in Queens County, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** sold six ghost gun firearms, and a quantity of magazines and ammunition to an individual known to the Grand Jury.
11. On or about March 2, 2024, **HARGENY FERNANDEZ-GONZALEZ** transferred \$3,176 to a co-conspirator, who is known to the Grand Jury.
12. On or about March 2, 2024, **SATVEER SAINI** texted a photograph displaying numerous firearms offered for sale to an individual known to the Grand Jury.

13. On or about March 2, 2024, **HARGENY FERNANDEZ-GONZALEZ** transferred \$325 to **MILANJIT SIDHU**.
14. On or about and between March 2, 2024 and March 3, 2024, **MILANJIT SIDHU** transported firearms in a white Honda Accord (Indiana license plate “3SIDHU”) from Indianapolis, Indiana to Queens County, New York.
15. On March 3, 2024, in Queens County, **MILANJIT SIDHU** met with **SATVEER SAINI**, **MATEO CASTRO-AGUDELO**, **HARGENY FERNANDEZ-GONZALEZ**, and **ADAM YOUSSEF SENHAJI-RIVAS**, in order to transfer firearms.
16. On or about March 3, 2024, **HARGENY FERNANDEZ-GONZALEZ** transported firearms into 86-74 106th Street, Queens County.
17. On or about March 3, 2024, **HARGENY FERNANDEZ-GONZALEZ** and **MATEO CASTRO-AGUDELO** transported firearms into 30-04 83rd Street, Queens County.
18. On or about March 7, 2024, **SATVEER SAINI** engaged in a telephone conversation with an individual known to the Grand Jury, wherein **SATVEER SAINI** stated in sum and substance: “Last price I can do, and that’s even coming out of my own stuff, I can go 17-flat.”
19. On or about March 8, 2024, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** sold an assault weapon, two 9-millimeter Glock pistols, and four ghost gun firearms to an individual known to the Grand Jury.
20. On or about March 16, 2024, **HARGENY FERNANDEZ-GONZALEZ** transported ghost gun firearms from Nassau County.

21. On or about March 21, 2024, in Queens County, **MATEO CASTRO-AGUDELO** sold an assault weapon, a 9-millimeter Glock pistol, and five ghost gun firearms to an individual known to the Grand Jury.
22. On or about and between April 12, 2024 and April 13, 2024, **MILANJIT SIDHU** transported firearms in a white Honda Accord (Indiana license plate “3SIDHU”) from Indianapolis, Indiana to Queens County, New York.
23. On or about April 22, 2024, **MATEO CASTRO-AGUDELO** texted an individual known to the Grand Jury a photograph of a guitar case and sent the following message, in pertinent part: “brother get yourself one of these and start learning how to play the guitar / Gut the inside . . . Well just keep swapping them I give you the stuff and I take the empty one / And it make the process easier that way I don’t have to take everything out my bag and put it in yours”.
24. On or about April 24, 2024, **MATEO CASTRO-AGUDELO** sold fourteen firearms to an individual known to the Grand Jury.
25. On or about May 16, 2024, **MATEO CASTRO-AGUDELO**, while carrying a guitar case, exited the garage located at 87-10 56th Avenue in Queens County.
26. On or about June 3, 2024, **MATEO CASTRO-AGUDELO** called an individual known to the Grand Jury and stated in sum and substance: “I have five AR-556’s, I have one 9-millimeter foldable, and I have 7 3-Ds.”
27. On or about June 6, 2024, **HARGENY FERNANDEZ-GONZALEZ** and **MATEO CASTRO-AGUDELO**, while carrying a guitar case, exited the garage located at 87-10 56th Street in Queens County.

COUNT 2

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between January 17, 2024 and January 26, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 405380, 405382, 420928, and 420923).

COUNT 3

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: two 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 405380 and 405382).

COUNT 4

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD**

DEGREE in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405380).

COUNT 5

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 January 17, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405380), with intent to sell it.

COUNT 6

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

Said defendant, on or about January 17, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 405380).

COUNT 7

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405380), and such 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 8

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 January 17, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405380).

COUNT 9

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM, RIFLE, OR SHOTGUN IN A SENSITIVE LOCATION** in violation of §265.01-e of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405380), in a sensitive location, inside of the Louis C. Moser Playground, and the defendant knew or reasonably should have known that such location is a sensitive location.

COUNT 10

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

Said defendant, on or about January 17, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405382).

COUNT 11

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF**

A FIREARM IN THE THIRD DEGREE in violation of §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 January 17, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405382), with intent to sell it.

COUNT 12

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

Said defendant, on or about January 17, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 405382).

COUNT 13

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405382), and such 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 14

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 January 17, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405382).

COUNT 15

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM, RIFLE, OR SHOTGUN IN A SENSITIVE LOCATION** in violation of §265.01-e of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 17, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405382), in a sensitive

location, inside of the Louis C. Moser Playground, and the defendant knew or reasonably should have known that such location is a sensitive location.

COUNT 16

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

Said defendant, on or about January 17, 2024, in Queens 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. 4001066805, Invoice Item 6, Lab Item 6.1), with a capacity of more than ten rounds of ammunition.

COUNT 17

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

Said defendant, on or about January 17, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001066805, Invoice Item 6, Lab Item 6.1), with a capacity of more than ten rounds of ammunition.

COUNT 18

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

Said defendant, on or about January 17, 2024, in Queens 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. 4001066805, Invoice Item 6, Lab Item 6.2), with a capacity of more than ten rounds of ammunition.

COUNT 19

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

Said defendant, on or about January 17, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001066805, Invoice Item 6, Lab Item 6.2), with a capacity of more than ten rounds of ammunition.

COUNT 20

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: two 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 420928 and 420923).

COUNT 21

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

Said defendant, on or about January 26, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420928).

COUNT 22

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD**

DEGREE in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420928), with intent to sell it.

COUNT 23

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

Said defendant, on or about January 26, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 420928).

COUNT 24

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420928), and such 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 25

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420928).

COUNT 26

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

Said defendant, on or about January 26, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420923).

COUNT 27

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD**

DEGREE in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420923), with intent to sell it.

COUNT 28

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

Said defendant, on or about January 26, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 420923).

COUNT 29

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420923), and such 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 30

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420923).

COUNT 31

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

Said defendant, on or about January 26, 2024, in Queens 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. 4001069906, Invoice Item 4, Lab Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 32

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

Said defendant, on or about January 26, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001069906, Invoice Item 4, Lab Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 33

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

Said defendant, on or about January 26, 2024, in Queens 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. 4001069906, Invoice Item 4, Lab Item 4.1), with a capacity of more than ten rounds of ammunition.

COUNT 34

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE**

THIRD DEGREE in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 26, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001069906, Invoice Item 4, Lab Item 4.1), with a capacity of more than ten rounds of ammunition.

COUNT 35

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: two 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 420889 and 420873).

COUNT 36

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

Said defendant, on or about January 31, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420889).

COUNT 37

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 January 30, 2024 and January 31, 2024, in Queens County and Nassau County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420889), with intent to sell it.

COUNT 38

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

Said defendant, on or about January 31, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 420889).

COUNT 39

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420889), and such 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 40

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 January 30, 2024 and January 31, 2024, in Queens County and Nassau County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420889).

COUNT 41

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD**

DEGREE in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420873).

COUNT 42

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 January 30, 2024 and January 31, 2024, in Queens County and Nassau County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420873), with intent to sell it.

COUNT 43

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

Said defendant, on or about January 31, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 420873).

COUNT 44

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420873), and such 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 45

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 January 30, 2024 and January 31, 2024, in Queens County and Nassau County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420873).

COUNT 46

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

Said defendant, on or about January 31, 2024, in Queens 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. 4001071448, Invoice Item 4, Lab Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 47

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

Said defendant, on or about January 31, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001071448, Invoice Item 4, Lab Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 48

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD**

DEGREE in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 31, 2024, in Queens 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. 4001071448, Invoice Item 4, Lab Item 4.1), with a capacity of more than ten rounds of ammunition.

COUNT 49

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

Said defendant, on or about January 31, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001071448, Invoice Item 4, Lab Item 4.1), with a capacity of more than ten rounds of ammunition.

COUNT 50

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(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 February 9, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 420892, 420887, 420903, and 420883).

COUNT 51

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(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 February 9, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 420892, 420887, 420903, and 420883).

COUNT 52

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) 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 February 9, 2024, in Queens County, did possess three or more firearms, to wit: four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 420892, 420887, 420903, and 420883).

COUNT 53

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 9, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420892).

COUNT 54

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 8, 2024 and February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420892), with intent to sell it.

COUNT 55

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF**

A GHOST GUN IN THE SECOND DEGREE in violation of §265.60(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 February 9, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 420892).

COUNT 56

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §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 February 9, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420892), and such possession took place outside the defendants' homes or places 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 57

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL**

POSSESSION OF A FIREARM in violation of §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 February 8, 2024 and February 9, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420892).

COUNT 58

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 9, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420887).

COUNT 59

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully

possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420887), with intent to sell it.

COUNT 60

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(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 February 9, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 420887).

COUNT 61

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §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 February 9, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420887), and such possession took place outside the defendants' homes or places 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 62

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 February 9, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420887).

COUNT 63

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 9, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420903).

COUNT 64

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 8, 2024 and February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420903), with intent to sell it.

COUNT 65

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(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 February 9, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 420903).

COUNT 66

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL**

POSSESSION OF A WEAPON IN THE SECOND DEGREE in violation of §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 February 9, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420903), and such possession took place outside the defendants' homes or places 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 67

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 February 8, 2024 and February 9, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420903).

COUNT 68

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 9, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420883).

COUNT 69

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 8, 2024 and February 9, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420883), with intent to sell it.

COUNT 70

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(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 February 9, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 420883).

COUNT 71

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §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 February 9, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420883), and such possession took place outside the defendants' homes or places 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 72

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 February 8, 2024 and February 9, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420883).

COUNT 73

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 9, 2024, in Queens 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. 4001074867, Invoice Item 4, Lab Item 8), with a capacity of more than ten rounds of ammunition.

COUNT 74

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 February 9, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001074867, Invoice Item 4, Lab Item 8), with a capacity of more than ten rounds of ammunition.

COUNT 75

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 9, 2024, in Queens 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. 4001074867, Invoice Item 4, Lab Item 8.1), with a capacity of more than ten rounds of ammunition.

COUNT 76

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 February 9, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001074867, Invoice Item 4, Lab Item 8.1), with a capacity of more than ten rounds of ammunition.

COUNT 77

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 9, 2024, in Queens 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. 4001074873, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 78

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 February 9, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001074873, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 79

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 9, 2024, in Queens 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. 4001076288, Invoice Item 1), with a capacity of more than ten rounds of ammunition.

COUNT 80

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 February 9, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001076288, Invoice Item 1), with a capacity of more than ten rounds of ammunition.

COUNT 81

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(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 February 21, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 405492, 405439, 405436, 405494, 405491, and 405488).

COUNT 82

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(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 February 21, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 405492, 405439, 405436, 405494, 405491, and 405488).

COUNT 83

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(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 February 21, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 405492, 405439, 405436, 405494, 405491, and 405488).

COUNT 84

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(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 February 21, 2024, in Queens County, did possess five or more firearms, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 405492, 405439, 405436, 405494, 405491, and 405488).

COUNT 85

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL**

POSSESSION OF A WEAPON IN THE THIRD DEGREE in violation of §265.02(5)(i) 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 February 21, 2024, in Queens County, did possess three or more firearms, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 405492, 405439, 405436, 405494, 405491, and 405488).

COUNT 86

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405492).

COUNT 87

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully

possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405492), with intent to sell it.

COUNT 88

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(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 February 21, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 405492).

COUNT 89

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §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 February 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405492), and such possession took place outside the defendants' homes or places 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 90

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 February 21, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405492).

COUNT 91

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405439).

COUNT 92

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405439), with intent to sell it.

COUNT 93

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(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 February 21, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 405439).

COUNT 94

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL**

POSSESSION OF A WEAPON IN THE SECOND DEGREE in violation of §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 February 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405439), and such possession took place outside the defendants' homes or places 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 95

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 February 21, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405439).

COUNT 96

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405436).

COUNT 97

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405436), with intent to sell it.

COUNT 98

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(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 February 21, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 405436).

COUNT 99

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §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 February 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405436), and such possession took place outside the defendants' homes or places 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 100

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 February 21, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405436).

COUNT 101

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405494).

COUNT 102

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405494), with intent to sell it.

COUNT 103

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL**

SALE OF A GHOST GUN IN THE SECOND DEGREE in violation of §265.60(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 February 21, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 405494).

COUNT 104

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §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 February 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405494), and such possession took place outside the defendants' homes or places 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 105

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL**

POSSESSION OF A FIREARM in violation of §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 February 21, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405494).

COUNT 106

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405491).

COUNT 107

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully

possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405491), with intent to sell it.

COUNT 108

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(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 February 21, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 405491).

COUNT 109

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §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 February 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405491), and such possession took place outside the defendants' homes or places 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 110

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 February 21, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405491).

COUNT 111

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405488).

COUNT 112

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405488), with intent to sell it.

COUNT 113

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(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 February 21, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 405488).

COUNT 114

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL**

POSSESSION OF A WEAPON IN THE SECOND DEGREE in violation of §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 February 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405488), and such possession took place outside the defendants' homes or places 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 115

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 February 21, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 405488).

COUNT 116

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens 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. 4001078475, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 117

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001078475, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 118

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens 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. 4001078511, Invoice Item 3, Lab Item 15), with a capacity of more than ten rounds of ammunition.

COUNT 119

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001078511, Invoice Item 3, Lab Item 15), with a capacity of more than ten rounds of ammunition.

COUNT 120

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens 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. 4001078511, Invoice Item 3, Lab Item 15.1), with a capacity of more than ten rounds of ammunition.

COUNT 121

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001078511, Invoice Item 3, Lab Item 15.1), with a capacity of more than ten rounds of ammunition.

COUNT 122

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens 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. 4001078511, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 123

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 February 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001078511, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 124

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 3, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 125

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 3, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 126

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 3, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 127

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **MANUFACTURE, TRANSPORT, DISPOSITION AND DEFACEMENT OF WEAPONS AND DANGEROUS INSTRUMENTS AND APPLIANCES**, in violation of Section 265.10(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did transport or ship as merchandise five or more firearms, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 128

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess five or more firearms, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), one 5.56x45mm caliber Palmetto

State Armory pistol (Serial No. SCD710956), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 129

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess three or more firearms, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 130

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

Said defendant, on or about March 3, 2024, in Queens 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: a .300-caliber Aero Precision pistol (Serial No. X144070).

COUNT 131

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

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070), with intent to sell it.

COUNT 132

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **MANUFACTURE, TRANSPORT, DISPOSITION AND DEFACEMENT OF WEAPONS AND DANGEROUS INSTRUMENTS AND APPLIANCES**, in violation of Section 265.10(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did transport or ship an assault weapon, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or partially or

completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

COUNT 133

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess an assault weapon, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

COUNT 134

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess a firearm, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070).

COUNT 135

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

Said defendant, on or about March 3, 2024, in Queens 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: a 9-millimeter Glock pistol (Serial No. WCD778).

COUNT 136

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

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. WCD778), with intent to sell it.

COUNT 137

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. WCD778).

COUNT 138

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

Said defendant, on or about March 3, 2024, in Queens 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: a 9-millimeter Glock pistol (Serial No. BYNF993).

COUNT 139

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

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BYNF993), with intent to sell it.

COUNT 140

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BYNF993).

COUNT 141

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

Said defendant, on or about March 3, 2024, in Queens 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: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956).

COUNT 142

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

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), with intent to sell it.

COUNT 143

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **MANUFACTURE, TRANSPORT, DISPOSITION AND DEFACEMENT OF WEAPONS AND DANGEROUS INSTRUMENTS AND APPLIANCES**, in violation of Section 265.10(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did transport or ship an assault weapon, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or

partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

COUNT 144

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess an assault weapon, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

COUNT 145

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess a firearm, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956).

COUNT 146

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

Said defendant, on or about March 3, 2024, in Queens 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: 22 Long Rifle caliber Glock pistol (Serial No. 21US2470).

COUNT 147

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

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), with intent to sell it.

COUNT 148

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess a firearm, to wit: 22 Long Rifle caliber Glock pistol (Serial No. 21US2470).

COUNT 149

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

Said defendant, on or about March 3, 2024, in Queens 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: a 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 150

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

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter SCCY CPX-2 pistol (Serial No. 842883), with intent to sell it.

COUNT 151

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess a firearm, to wit: a 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 152

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

Said defendant, on or about March 3, 2024, in Queens 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 .300 caliber magazine (NYPD Invoice No. 4001083581, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 153

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MILANJIT SIDHU** of the crime of **MANUFACTURE, TRANSPORT, DISPOSITION AND DEFACEMENT OF WEAPONS AND DANGEROUS INSTRUMENTS AND APPLIANCES**, in violation of Section 265.10(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did transport or ship a large capacity ammunition feeding device, to wit: a .300 caliber magazine (NYPD Invoice No. 4001083581, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 154

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

Said defendant, on or about and between March 2, 2024 and March 3, 2024, in Queens County, the State of Indiana, and elsewhere inside and outside the State of New York, did possess a large capacity ammunition feeding device, to wit: a .300 caliber magazine (NYPD Invoice No. 4001083581, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 155

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(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 March 8, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), and four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743835, 743802, 743854, and 743813).

COUNT 156

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(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 March 8, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), and four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743835, 743802, 743854, and 743813).

COUNT 157

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(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 March 8, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), and four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743835, 743802, 743854, and 743813).

COUNT 158

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(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 March 8, 2024, in Queens County, did possess five or more firearms, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993), and four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743835, 743802, 743854, and 743813).

COUNT 159

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) 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 3, 2024 and March 8, 2024, in Queens County, did possess three or more firearms, to wit: one .300-caliber Aero Precision pistol (Serial No. X144070), and two 9-millimeter Glock pistols (Serial Nos. WCD778 and BYNF993).

COUNT 160

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens 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: a .300-caliber Aero Precision pistol (Serial No. X144070).

COUNT 161

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 3, 2024 and March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070), with intent to sell it.

COUNT 162

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) 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 3, 2024 and March 8, 2024, in Queens County, did possess an assault weapon, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or

silencer, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

COUNT 163

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 March 3, 2024 and March 8, 2024, in Queens County, did possess a firearm, to wit: a .300-caliber Aero Precision pistol (Serial No. X144070).

COUNT 164

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens 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: a 9-millimeter Glock pistol (Serial No. WCD778).

COUNT 165

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 3, 2024 and March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. WCD778), with intent to sell it.

COUNT 166

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** 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 March 8, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock pistol (Serial No. WCD778), and such possession took place outside the defendants' homes or places 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 167

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 March 3, 2024 and March 8, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. WCD778).

COUNT 168

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens 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: a 9-millimeter Glock pistol (Serial No. BYNF993).

COUNT 169

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE**

OF A FIREARM IN THE THIRD DEGREE in violation of §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 March 3, 2024 and March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BYNF993), with intent to sell it.

COUNT 170

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** 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 March 8, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock pistol (Serial No. BYNF993), and such possession took place outside the defendants' homes or places 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 171

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI**, **MATEO CASTRO-AGUDELO**, **HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL**

POSSESSION OF A FIREARM in violation of §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 March 3, 2024 and March 8, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BYNF993).

COUNT 172

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743835).

COUNT 173

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully

possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743835), with intent to sell it.

COUNT 174

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(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 March 8, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743835).

COUNT 175

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §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 March 8, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743835), and such possession took place outside the defendants' homes or places 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 176

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 March 8, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743835).

COUNT 177

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743802).

COUNT 178

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743802), with intent to sell it.

COUNT 179

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(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 March 8, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743802).

COUNT 180

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL**

POSSESSION OF A WEAPON IN THE SECOND DEGREE in violation of §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 March 8, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743802), and such possession took place outside the defendants' homes or places 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 181

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 March 8, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743802).

COUNT 182

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743854).

COUNT 183

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743854), with intent to sell it.

COUNT 184

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(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 March 8, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743854).

COUNT 185

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §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 March 8, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743854), and such possession took place outside the defendants' homes or places 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 186

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 March 8, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743854).

COUNT 187

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743813).

COUNT 188

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743813), with intent to sell it.

COUNT 189

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF**

A GHOST GUN IN THE SECOND DEGREE in violation of §265.60(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 March 8, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743813).

COUNT 190

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §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 March 8, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743813), and such possession took place outside the defendants' homes or places 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 191

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL**

POSSESSION OF A FIREARM in violation of §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 March 8, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743813).

COUNT 192

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens 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 .300 caliber magazine (NYPD Invoice No. 4001083581, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 193

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, MATEO CASTRO-AGUDELO, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 March 3, 2024 and March 8, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a .300 caliber magazine (NYPD Invoice No. 4001083581, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 194

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens 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. 4001083583, Invoice Item 3, Lab Item 6), with a capacity of more than ten rounds of ammunition.

COUNT 195

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter

magazine (NYPD Invoice No. 4001083583, Invoice Item 3, Lab Item 6), with a capacity of more than ten rounds of ammunition.

COUNT 196

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens 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. 4001083583, Invoice Item 3, Lab Item 6.1), with a capacity of more than ten rounds of ammunition.

COUNT 197

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083583, Invoice Item 3, Lab Item 6.1), with a capacity of more than ten rounds of ammunition.

COUNT 198

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens 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. 4001083588, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 199

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083588, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 200

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens 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. 4001083588, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 201

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083588, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 202

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens 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. 4001083592, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 203

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083592, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 204

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens 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. 4001083592, Invoice Item 5), with a capacity of more than ten rounds of ammunition.

COUNT 205

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI** and **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §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 March 8, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001083592, Invoice Item 5), with a capacity of more than ten rounds of ammunition.

COUNT 206

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 439525, 743883, 743858, and 743824), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 207

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 439525, 743883, 743858, and 743824), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 208

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 439525, 743883, 743858, and 743824), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 209

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess five or more firearms, to wit: one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), four 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 439525, 743883, 743858, and 743824), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 210

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) 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 3, 2024 and March 14, 2024, in Queens County, did possess three or more firearms, to wit: one 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), one 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and one 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 211

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

Said defendant, on or about March 14, 2024, in Queens 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: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956).

COUNT 212

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 3, 2024 and March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956).

COUNT 213

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), and such 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 214

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) 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 3, 2024 and March 14, 2024, in Queens County, did possess an assault weapon, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

COUNT 215

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 March 3, 2024 and March 14, 2024, in Queens County, did possess a firearm, to wit: a 5.56x45mm caliber Palmetto State Armory pistol (Serial No. SCD710956).

COUNT 216

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

Said defendant, on or about March 14, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439525).

COUNT 217

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

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439525), with intent to sell it.

COUNT 218

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND**

DEGREE in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 439525).

COUNT 219

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439525), and such 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 220

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439525).

COUNT 221

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

Said defendant, on or about March 14, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743883).

COUNT 222

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

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743883), with intent to sell it.

COUNT 223

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND**

DEGREE in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743883).

COUNT 224

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743883), and such 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 225

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743883).

COUNT 226

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

Said defendant, on or about March 14, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743858).

COUNT 227

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

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743858), with intent to sell it.

COUNT 228

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND**

DEGREE in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743858).

COUNT 229

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743858), and such 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 230

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743858).

COUNT 231

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

Said defendant, on or about March 14, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743824).

COUNT 232

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

Said defendant, on or about March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743824), with intent to sell it.

COUNT 233

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND**

DEGREE in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743824).

COUNT 234

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743824), and such 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 235

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743824).

COUNT 236

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

Said defendant, on or about March 14, 2024, in Queens 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: a 22 Long Rifle caliber Glock pistol (Serial No. 21US2470).

COUNT 237

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 3, 2024 and March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), with intent to sell it.

COUNT 238

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** 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 defendant, on or about March 14, 2024, in Queens County, did possess a loaded firearm, to wit: a 22 Long Rifle caliber Glock pistol (Serial No. 21US2470), and such 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 239

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 March 3, 2024 and March 14, 2024, in Queens County, did possess a firearm, to wit: a 22 Long Rifle caliber Glock pistol (Serial No. 21US2470).

COUNT 240

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

Said defendant, on or about March 14, 2024, in Queens 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: a 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 241

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 3, 2024 and March 14, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter SCCY CPX-2 pistol (Serial No. 842883), with intent to sell it.

COUNT 242

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** 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 defendant, on or about March 14, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter SCCY CPX-2 pistol (Serial No. 842883), and such 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 243

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **SATVEER SAINI, HARGENY FERNANDEZ-GONZALEZ** and **ADAM YOUSSEF SENHAJI-RIVAS** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 March 3, 2024 and March 14, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter SCCY CPX-2 pistol (Serial No. 842883).

COUNT 244

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

Said defendant, on or about March 14, 2024, in Queens 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 5.56x45mm caliber magazine (NYPD Invoice No. 4001085400, Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 245

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

Said defendant, on or about March 14, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001085400, Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 246

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

Said defendant, on or about March 14, 2024, in Queens 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. 4001085403, Item 3, Lab Item 21), with a capacity of more than ten rounds of ammunition.

COUNT 247

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **SATVEER SAINI** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE**

THIRD DEGREE in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 14, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001085403, Item 3, Lab Item 21), with a capacity of more than ten rounds of ammunition.

COUNT 248

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

Said defendant, on or about March 14, 2024, in Queens 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. 4001085403, Item 3, Lab Item 21.1), with a capacity of more than ten rounds of ammunition.

COUNT 249

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

Said defendant, on or about March 14, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001085403, Item 3, Lab Item 21.1), with a capacity of more than ten rounds of ammunition.

COUNT 250

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

Said defendant, on or about March 14, 2024, in Queens 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. 4001085409, Item 3, Lab Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 251

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

Said defendant, on or about March 14, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001085409, Item 3, Lab Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 252

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

Said defendant, on or about March 14, 2024, in Queens 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. 4001085409, Item 3, Lab Item 3.1), with a capacity of more than ten rounds of ammunition.

COUNT 253

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

Said defendant, on or about March 14, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001085409, Item 3, Lab Item 3.1), with a capacity of more than ten rounds of ammunition.

COUNT 254

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

FIRST DEGREE in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one 5.56x45mm caliber American Tactical rifle (Serial No. NS003684), one 9-millimeter Glock pistol (Serial No. BPMB999), and five 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743839, 743869, 743855, 439496, and 439456).

COUNT 255

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one 5.56x45mm caliber American Tactical rifle (Serial No. NS003684), one 9-millimeter Glock pistol (Serial No. BPMB999), and five 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743839, 743869, 743855, 439496, and 439456).

COUNT 256

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

SECOND DEGREE in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 5.56x45mm caliber American Tactical rifle (Serial No. NS003684), one 9-millimeter Glock pistol (Serial No. BPMB999), and five 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743839, 743869, 743855, 439496, and 439456).

COUNT 257

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **HARGENY FERNANDEZ-GONZALEZ** of the crime of **MANUFACTURE, TRANSPORT, DISPOSITION AND DEFACEMENT OF WEAPONS AND DANGEROUS INSTRUMENTS AND APPLIANCES**, in violation of Section 265.10(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 16, 2024, in Queens County and Nassau County, did transport or ship as merchandise five or more firearms, to wit: five 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743839, 743869, 743855, 439496, and 439456).

COUNT 258

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of

CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE in violation of §265.03(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 March 16, 2024 and March 21, 2024, in Queens County and Nassau County, did possess five or more firearms, to wit: five 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743839, 743869, 743855, 439496, and 439456).

COUNT 259

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) 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 16, 2024 and March 21, 2024, in Queens County and Nassau County, did possess three or more firearms, to wit: five 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743839, 743869, 743855, 439496, and 439456).

COUNT 260

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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: a 5.56x45mm caliber American Tactical rifle (Serial No. NS003684).

COUNT 261

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 5.56x45mm caliber American Tactical rifle (Serial No. NS003684).

COUNT 262

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 5.56x45mm caliber American Tactical rifle (Serial No. NS003684), and such 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 263

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess an assault weapon, to wit: a 5.56x45mm caliber American Tactical rifle (Serial No. NS003684), which has the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, and has a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, a second handgrip that can be held by the non-trigger hand, and a flash suppressor, muzzle brake, muzzle compensator, or threaded barrel designed to accommodate a flash suppressor, muzzle brake, or muzzle compensator.

COUNT 264

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a firearm, to wit: a 5.56x45mm caliber American Tactical rifle (Serial No. NS003684).

COUNT 265

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

THIRD DEGREE in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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: a 9-millimeter Glock pistol (Serial No. BPMB999).

COUNT 266

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BPMB999), with intent to sell it.

COUNT 267

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** 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 defendant, on or about March 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock pistol (Serial No. BPMB999), and such 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 268

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BPMB999).

COUNT 269

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743839).

COUNT 270

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of

CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE in violation of §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 March 16, 2024 and March 21, 2024, in Queens County and Nassau County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743839), with intent to sell it.

COUNT 271

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743839).

COUNT 272

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743839), and such 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 273

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 March 16, 2024 and March 21, 2024, in Queens County and Nassau County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743839).

COUNT 274

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743869).

COUNT 275

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 16, 2024 and March 21, 2024, in Queens County and Nassau County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743869), with intent to sell it.

COUNT 276

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743869).

COUNT 277

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743869), and such 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 278

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 March 16, 2024 and March 21, 2024, in Queens County and Nassau County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743869).

COUNT 279

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

THIRD DEGREE in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743855).

COUNT 280

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 16, 2024 and March 21, 2024, in Queens County and Nassau County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743855), with intent to sell it.

COUNT 281

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743855).

COUNT 282

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743855), and such 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 283

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 March 16, 2024 and March 21, 2024, in Queens County and Nassau County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743855).

COUNT 284

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439496).

COUNT 285

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 16, 2024 and March 21, 2024, in Queens County and Nassau County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439496), with intent to sell it.

COUNT 286

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN**

THE SECOND DEGREE in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 439496).

COUNT 287

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439496), and such 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 288

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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 March 16, 2024 and March 21, 2024, in Queens County and Nassau County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439496).

COUNT 289

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439456).

COUNT 290

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §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 March 16, 2024 and March 21, 2024, in Queens County and Nassau County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439456), with intent to sell it.

COUNT 291

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 439456).

COUNT 292

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439456), and such 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 293

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of

CRIMINAL POSSESSION OF A FIREARM in violation of §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 March 16, 2024 and March 21, 2024, in Queens County and Nassau County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439456).

COUNT 294

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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. 4001087777, Invoice Item 3, Lab Item 7), with a capacity of more than ten rounds of ammunition.

COUNT 295

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087777, Invoice Item 3, Lab Item 7), with a capacity of more than ten rounds of ammunition.

COUNT 296

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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. 4001087777, Invoice Item 3, Lab Item 7.1), with a capacity of more than ten rounds of ammunition.

COUNT 297

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087777, Invoice Item 3, Lab Item 7.1), with a capacity of more than ten rounds of ammunition.

COUNT 298

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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 5.56x45mm magazine (NYPD Invoice No. 4001087780, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 299

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm magazine (NYPD Invoice No. 4001087780, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 300

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

THIRD DEGREE in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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. 4001087781, Invoice Item 4, Lab Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 301

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087781, Invoice Item 4, Lab Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 302

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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. 4001087781, Invoice Item 4, Lab Item 4.1), with a capacity of more than ten rounds of ammunition.

COUNT 303

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087781, Invoice Item 4, Lab Item 4.1), with a capacity of more than ten rounds of ammunition.

COUNT 304

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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. 4001087789, Invoice Item 3, Lab Item 11), with a capacity of more than ten rounds of ammunition.

COUNT 305

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087789, Invoice Item 3, Lab Item 11), with a capacity of more than ten rounds of ammunition.

COUNT 306

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens 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. 4001087789, Invoice Item 3, Lab Item 11.1), with a capacity of more than ten rounds of ammunition.

COUNT 307

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 21, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001087789, Invoice Item 3, Lab Item 11.1), with a capacity of more than ten rounds of ammunition.

COUNT 308

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743852, 439459, 420836, 743814, 743834, and 439453).

COUNT 309

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

SECOND DEGREE in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743852, 439459, 420836, 743814, 743834, and 439453).

COUNT 310

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743852, 439459, 420836, 743814, 743834, and 439453).

COUNT 311

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess five or more firearms, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743852, 439459, 420836, 743814, 743834, and 439453).

COUNT 312

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess three or more firearms, to wit: six 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743852, 439459, 420836, 743814, 743834, and 439453).

COUNT 313

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743852).

COUNT 314

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743852), with intent to sell it.

COUNT 315

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743852).

COUNT 316

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743852), and such 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 317

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743852).

COUNT 318

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439459).

COUNT 319

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439459), with intent to sell it.

COUNT 320

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 439459).

COUNT 321

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439459), and such 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 322

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439459).

COUNT 323

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420836).

COUNT 324

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420836), with intent to sell it.

COUNT 325

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 420836).

COUNT 326

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420836), and such 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 327

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 420836).

COUNT 328

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743814).

COUNT 329

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743814), with intent to sell it.

COUNT 330

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743814).

COUNT 331

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743814), and such 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 332

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743814).

COUNT 333

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743834).

COUNT 334

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743834), with intent to sell it.

COUNT 335

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743834).

COUNT 336

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743834), and such 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 337

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743834).

COUNT 338

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439453).

COUNT 339

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439453), with intent to sell it.

COUNT 340

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 439453).

COUNT 341

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439453), and such 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 342

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439453).

COUNT 343

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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. 4001094378, Invoice Item 3, Lab Item 3.1), with a capacity of more than ten rounds of ammunition.

COUNT 344

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094378, Invoice Item 3, Lab Item 3.1), with a capacity of more than ten rounds of ammunition.

COUNT 345

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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. 4001094378, Invoice Item 3, Lab Item 3.2), with a capacity of more than ten rounds of ammunition.

COUNT 346

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON**

IN THE THIRD DEGREE in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094378, Invoice Item 3, Lab Item 3.2), with a capacity of more than ten rounds of ammunition.

COUNT 347

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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. 4001094379, Invoice Item 2, Lab Item 6), with a capacity of more than ten rounds of ammunition.

COUNT 348

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094379, Invoice Item 2, Lab Item 6), with a capacity of more than ten rounds of ammunition.

COUNT 349

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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. 4001094379, Invoice Item 2, Lab Item 6.1), with a capacity of more than ten rounds of ammunition.

COUNT 350

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094379, Invoice Item 2, Lab Item 6.1), with a capacity of more than ten rounds of ammunition.

COUNT 351

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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. 4001094381, Invoice Item 3, Lab Item 10.1), with a capacity of more than ten rounds of ammunition.

COUNT 352

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094381, Invoice Item 3, Lab Item 10.1), with a capacity of more than ten rounds of ammunition.

COUNT 353

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

THIRD DEGREE in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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. 4001094381, Invoice Item 3, Lab Item 10.2), with a capacity of more than ten rounds of ammunition.

COUNT 354

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094381, Invoice Item 3, Lab Item 10.2), with a capacity of more than ten rounds of ammunition.

COUNT 355

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens 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. 4001094391, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 356

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 12, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001094391, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 357

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another ten or more firearms, to wit: one 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), two 40-caliber Glock pistols (Serial Nos. BUZF831 and AANC987), one 10-millimeter Glock pistol (Serial No. BYVX500), one 9-millimeter Glock pistol

(Serial No. BPZP868), one 380-caliber Glock pistol (Serial No. AKGX329), and eight 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743894, 743805, 743820, 743878, 743817, 743840, 743836 and 743808).

COUNT 358

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), two 40-caliber Glock pistols (Serial Nos. BUZF831 and AANC987), one 10-millimeter Glock pistol (Serial No. BYVX500), one 9-millimeter Glock pistol (Serial No. BPZP868), one 380-caliber Glock pistol (Serial No. AKGX329), and eight 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743894, 743805, 743820, 743878, 743817, 743840, 743836 and 743808).

COUNT 359

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), two 40-caliber Glock pistols (Serial Nos. BUZF831 and AANC987), one 10-millimeter Glock pistol (Serial No. BYVX500), one 9-millimeter Glock pistol (Serial No. BPZP868), one 380-caliber Glock pistol (Serial No. AKGX329), and eight 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743894, 743805, 743820, 743878, 743817, 743840, 743836 and 743808).

COUNT 360

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), two 40-caliber Glock pistols (Serial Nos. BUZF831 and AANC987), one 10-millimeter Glock pistol (Serial No. BYVX500), one 9-millimeter Glock pistol (Serial No. BPZP868), one 380-caliber Glock pistol (Serial No. AKGX329), and eight 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743894, 743805, 743820, 743878, 743817, 743840, 743836 and 743808).

COUNT 361

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE FIRST DEGREE** in violation of §265.04(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess ten or more firearms, to wit: one 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), two 40-caliber Glock pistols (Serial Nos. BUZF831 and AANC987), one 10-millimeter Glock pistol (Serial No. BYVX500), one 9-millimeter Glock pistol (Serial No. BPZP868), one 380-caliber Glock pistol (Serial No. AKGX329), and eight 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743894, 743805, 743820, 743878, 743817, 743840, 743836 and 743808).

COUNT 362

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess five or more firearms, to wit: one 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), two 40-caliber Glock pistols (Serial Nos. BUZF831 and AANC987), one 10-millimeter Glock pistol (Serial No. BYVX500), one 9-millimeter Glock pistol (Serial No. BPZP868), one 380-caliber Glock pistol (Serial No. AKGX329), and eight 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743894, 743805, 743820, 743878, 743817, 743840, 743836 and 743808).

COUNT 363

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess three or more firearms, to wit: one 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), two 40-caliber Glock pistols (Serial Nos. BUZF831 and AANC987), one 10-millimeter Glock pistol (Serial No. BYVX500), one 9-millimeter Glock pistol (Serial No. BPZP868), one 380-caliber Glock pistol (Serial No. AKGX329), and eight 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743894, 743805, 743820, 743878, 743817, 743840, 743836 and 743808).

COUNT 364

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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: a 9-millimeter Smith & Wesson pistol (Serial No. RBY0146).

COUNT 365

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), with intent to sell it.

COUNT 366

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** 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 defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Smith & Wesson pistol (Serial No. RBY0146), and such 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 367

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Smith & Wesson pistol (Serial No. RBY0146).

COUNT 368

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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: a 40-caliber Glock pistol (Serial No. BUZF831).

COUNT 369

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 40-caliber Glock pistol (Serial No. BUZF831), with intent to sell it.

COUNT 370

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 40-caliber Glock pistol (Serial No. BUZF831).

COUNT 371

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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: a 40-caliber Glock pistol (Serial No. AANC987).

COUNT 372

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 40-caliber Glock pistol (Serial No. AANC987), with intent to sell it.

COUNT 373

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 40-caliber Glock pistol (Serial No. AANC987).

COUNT 374

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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: a 10-millimeter Glock pistol (Serial No. BYVX500).

COUNT 375

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

THIRD DEGREE in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 10-millimeter Glock pistol (Serial No. BYVX500), with intent to sell it.

COUNT 376

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 10-millimeter Glock pistol (Serial No. BYVX500).

COUNT 377

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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: a 9-millimeter Glock pistol (Serial No. BPZP868).

COUNT 378

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BPZP868), with intent to sell it.

COUNT 379

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** 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 defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock pistol (Serial No. BPZP868), and such 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 380

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock pistol (Serial No. BPZP868).

COUNT 381

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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: a .380-caliber Glock pistol (Serial No. AKGX329).

COUNT 382

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a .380-caliber Glock pistol (Serial No. AKGX329), with intent to sell it.

COUNT 383

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a .380-caliber Glock pistol (Serial No. AKGX329).

COUNT 384

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743894).

COUNT 385

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743894), with intent to sell it.

COUNT 386

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743894).

COUNT 387

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743894), and such 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 388

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743894).

COUNT 389

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743805).

COUNT 390

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743805), with intent to sell it.

COUNT 391

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743805).

COUNT 392

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743805), and such 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 393

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743805).

COUNT 394

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743820).

COUNT 395

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743820), with intent to sell it.

COUNT 396

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743820).

COUNT 397

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743820), and such 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 398

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743820).

COUNT 399

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743878).

COUNT 400

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743878), with intent to sell it.

COUNT 401

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743878).

COUNT 402

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743878), and such 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 403

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743878).

COUNT 404

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743817).

COUNT 405

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743817), with intent to sell it.

COUNT 406

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743817).

COUNT 407

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743817), and such 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 408

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743817).

COUNT 409

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743840).

COUNT 410

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743840), with intent to sell it.

COUNT 411

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743840).

COUNT 412

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743840), and such 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 413

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743840).

COUNT 414

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743836).

COUNT 415

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743836), with intent to sell it.

COUNT 416

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743836).

COUNT 417

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743836), and such 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 418

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743836).

COUNT 419

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743808).

COUNT 420

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743808), with intent to sell it.

COUNT 421

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE** in violation of §265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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 Glock-style ghost gun pistol (NYPD Lead Seal No. 743808).

COUNT 422

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743808), and such 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 423

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743808).

COUNT 424

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098178, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 425

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098178, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 426

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098178, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 427

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON**

IN THE THIRD DEGREE in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098178, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 428

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098184, Invoice Item 3, Lab Item 31.1), with a capacity of more than ten rounds of ammunition.

COUNT 429

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098184, Invoice Item 3, Lab Item 31.1), with a capacity of more than ten rounds of ammunition.

COUNT 430

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098184, Invoice Item 3, Lab Item 31.2), with a capacity of more than ten rounds of ammunition.

COUNT 431

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098184, Invoice Item 3, Lab Item 31.2), with a capacity of more than ten rounds of ammunition.

COUNT 432

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098189, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 433

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098189, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 434

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

THIRD DEGREE in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098193, Invoice Item 3, Lab Item 22.1), with a capacity of more than ten rounds of ammunition.

COUNT 435

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098193, Invoice Item 3, Lab Item 22.1), with a capacity of more than ten rounds of ammunition.

COUNT 436

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098193, Invoice Item 3, Lab Item 22.2), with a capacity of more than ten rounds of ammunition.

COUNT 437

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098193, Invoice Item 3, Lab Item 22.2), with a capacity of more than ten rounds of ammunition.

COUNT 438

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098195, Invoice Item 3, Lab Item 7.1), with a capacity of more than ten rounds of ammunition.

COUNT 439

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098195, Invoice Item 3, Lab Item 7.1) with a capacity of more than ten rounds of ammunition.

COUNT 440

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098195, Invoice Item 3, Lab Item 7.2), with a capacity of more than ten rounds of ammunition.

COUNT 441

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098195, Invoice Item 3, Lab Item 7.2), with a capacity of more than ten rounds of ammunition.

COUNT 442

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098198, Invoice Item 3, Lab Item 16.1), with a capacity of more than ten rounds of ammunition.

COUNT 443

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON**

IN THE THIRD DEGREE in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 3, Lab Item 16.1) with a capacity of more than ten rounds of ammunition.

COUNT 444

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098198, Invoice Item 3, Lab Item 16.2), with a capacity of more than ten rounds of ammunition.

COUNT 445

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 3, Lab Item 16.2), with a capacity of more than ten rounds of ammunition.

COUNT 446

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098198, Invoice Item 5, Lab Item 18.1), with a capacity of more than ten rounds of ammunition.

COUNT 447

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 5, Lab Item 18.1), with a capacity of more than ten rounds of ammunition.

COUNT 448

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098198, Invoice Item 5, Lab Item 18.2), with a capacity of more than ten rounds of ammunition.

COUNT 449

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 5, Lab Item 18.2), with a capacity of more than ten rounds of ammunition.

COUNT 450

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

THIRD DEGREE in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098198, Invoice Item 5, Lab Item 18.3), with a capacity of more than ten rounds of ammunition.

COUNT 451

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 5, Lab Item 18.3), with a capacity of more than ten rounds of ammunition.

COUNT 452

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098198, Invoice Item 5, Lab Item 18.4), with a capacity of more than ten rounds of ammunition.

COUNT 453

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 5, Lab Item 18.4), with a capacity of more than ten rounds of ammunition.

COUNT 454

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens 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. 4001098198, Invoice Item 6), with a capacity of more than ten rounds of ammunition.

COUNT 455

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 24, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001098198, Invoice Item 6), with a capacity of more than ten rounds of ammunition.

COUNT 456

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), one 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), two 7.62x39-millimeter Century Arms VSKA pistols (Serial Nos. SV7P012825 and SV7P009899), and one .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068).

COUNT 457

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), one 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), two 7.62x39-millimeter Century Arms VSKA pistols (Serial Nos. SV7P012825 and SV7P009899), and one .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068).

COUNT 458

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), one 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), two 7.62x39-millimeter Century Arms VSKA pistols (Serial Nos. SV7P012825 and SV7P009899), and one .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068).

COUNT 459

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess five or more firearms, to wit: one .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), one 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), two 7.62x39-millimeter Century Arms VSKA pistols (Serial Nos. SV7P012825 and SV7P009899), one .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068).

COUNT 460

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess three or more firearms, to wit: one .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), one 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), two 7.62x39-millimeter Century Arms VSKA pistols (Serial Nos. SV7P012825 and SV7P009899), and one .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068).

COUNT 461

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens 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: a .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588).

COUNT 462

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), with intent to sell it.

COUNT 463

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), and such 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 464

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess an assault weapon, to wit: a .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588), which has the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, and has a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a threaded barrel with a muzzle compensator.

COUNT 465

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a firearm, to wit: a .22-caliber Smith & Wesson M&P15-22 rifle (Serial No. DFF5588).

COUNT 466

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens 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: a 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961).

COUNT 467

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), with intent to sell it.

COUNT 468

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), and such 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 469

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess an assault weapon, to wit: a 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961), which has the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, and has a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a threaded barrel with a muzzle compensator.

COUNT 470

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a firearm, to wit: a 5.56x45-millimeter Del-Ton DTI-15 rifle (Serial No. DTI-S296961).

COUNT 471

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens 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: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P012825).

COUNT 472

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P012825), with intent to sell it.

COUNT 473

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON**

IN THE SECOND DEGREE in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P012825), and such 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 474

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess an assault weapon, to wit: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P012825), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, has a second handgrip that can be held by the non-trigger hand, has a capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, and has a threaded barrel with a flash suppressor.

COUNT 475

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a firearm, to wit: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P012825).

COUNT 476

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens 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: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P009899).

COUNT 477

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P009899), with intent to sell it.

COUNT 478

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P009899), and such 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 479

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess an assault weapon, to wit: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P009899), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, has a second handgrip that can be held by the non-trigger hand, has a capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, and has a threaded barrel with a flash suppressor.

COUNT 480

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a firearm, to wit: a 7.62x39-millimeter Century Arms VSKA pistol (Serial No. SV7P009899).

COUNT 481

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens 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: a .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068).

COUNT 482

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068), with intent to sell it.

COUNT 483

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068), and such 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 484

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess an assault weapon, to wit: a .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068), which has the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a capacity to accept an ammunition magazine that attaches to the pistol

outside of the pistol grip, a threaded barrel capable of accepting a flash suppressor, and a shroud that partially encircles the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

COUNT 485

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a firearm, to wit: a .22-caliber Heckler & Koch MP5 rifle (Serial No. HD023068).

COUNT 486

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens 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 .22-caliber magazine (NYPD Invoice No. 4001098907, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 487

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON**

IN THE THIRD DEGREE in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a .22-caliber magazine (NYPD Invoice No. 4001098907, Invoice Item 3) with a capacity of more than ten rounds of ammunition.

COUNT 488

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens 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 5.56x45mm caliber magazine (NYPD Invoice No. 4001098907, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 489

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001098907, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 490

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens 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 7.62x39mm magazine (NYPD Invoice No. 4001098908, Invoice Item 3, Lab Item 6.1), with a capacity of more than ten rounds of ammunition.

COUNT 491

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 7.62x39mm magazine (NYPD Invoice No. 4001098908, Invoice Item 3, Lab Item 6.1) with a capacity of more than ten rounds of ammunition.

COUNT 492

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens 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 7.62x39mm magazine (NYPD Invoice No. 4001098908, Invoice Item 3, Lab Item 6.2), with a capacity of more than ten rounds of ammunition.

COUNT 493

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 7.62x39mm magazine (NYPD Invoice No. 4001098908, Invoice Item 3, Lab Item 6.2), with a capacity of more than ten rounds of ammunition.

COUNT 494

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

THIRD DEGREE in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens 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 .22-caliber magazine (NYPD Invoice No. 4001098912, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 495

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 26, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a .22-caliber magazine (NYPD Invoice No. 4001098912, Invoice Item 2) with a capacity of more than ten rounds of ammunition.

COUNT 496

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a

period of not more than one year, to wit: one .22-caliber Mauser M-15 rifle (Serial No. B116411), one 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), one 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), one 9-millimeter Intratec AB-10 pistol (Serial No. A043521), and one 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997).

COUNT 497

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one .22-caliber Mauser M-15 rifle (Serial No. B116411), one 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), one 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), one 9-millimeter Intratec AB-10 pistol (Serial No. A043521), and one 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997).

COUNT 498

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one .22-caliber Mauser M-15 rifle (Serial No. B116411), one 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), one 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), one 9-millimeter Intratec AB-10 pistol (Serial No. A043521), and one 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997).

COUNT 499

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess five or more firearms, to wit: one .22-caliber Mauser M-15 rifle (Serial No. B116411), one 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), one 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), one 9-millimeter Intratec AB-10 pistol (Serial No. A043521), and one 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997).

COUNT 500

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON**

IN THE THIRD DEGREE in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess three or more firearms, to wit: one .22-caliber Mauser M-15 rifle (Serial No. B116411), one 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), one 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), one 9-millimeter Intratec AB-10 pistol (Serial No. A043521), and one 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997).

COUNT 501

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens 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: a .22-caliber Mauser M-15 rifle (Serial No. B116411).

COUNT 502

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a .22-caliber Mauser M-15 rifle (Serial No. B116411), with intent to sell it.

COUNT 503

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded .22-caliber Mauser M-15 rifle (Serial No. B116411), and such 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 504

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess an assault weapon, to wit: a .22-caliber Mauser M-15 rifle (Serial No. B116411), which has the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable

magazine, and has a folding, telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a threaded barrel.

COUNT 505

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a firearm, to wit: a .22-caliber Mauser M-15 rifle (Serial No. B116411).

COUNT 506

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens 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: a 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155).

COUNT 507

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), with intent to sell it.

COUNT 508

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), and such 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 509

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess an assault weapon, to wit: a 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155), which has the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept

a detachable magazine, and has a folding, telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a threaded barrel.

COUNT 510

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter CZ Scorpion EVO 3 S1 Carbine rifle (Serial No. F287155).

COUNT 511

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens 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: a 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459).

COUNT 512

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

THIRD DEGREE in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), with intent to sell it.

COUNT 513

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), and such 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 514

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess an assault weapon, to wit: a 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459), which

has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, and has threaded barrel capable of accepting a barrel extender.

COUNT 515

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Masterpiece Arms MPA30SST pistol (Serial No. FX50459).

COUNT 516

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens 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: a 9-millimeter Intratec AB-10 pistol (Serial No. A043521).

COUNT 517

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

THIRD DEGREE in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Intratec AB-10 pistol (Serial No. A043521), with intent to sell it.

COUNT 518

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Intratec AB-10 pistol (Serial No. A043521), and such 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 519

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess an assault weapon, to wit: a 9-millimeter Intratec AB-10 pistol (Serial No. A043521), which has the

following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, and the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip.

COUNT 520

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Intratec AB-10 pistol (Serial No. A043521).

COUNT 521

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens 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: a 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997).

COUNT 522

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

THIRD DEGREE in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997), with intent to sell it.

COUNT 523

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997), and such 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 524

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess an assault weapon, to wit: a 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997), which has the

following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, and has a threaded barrel.

COUNT 525

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter AREX Rex Zero 1T pistol (Serial No. GZ15997).

COUNT 526

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens 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 .22-caliber magazine (NYPD Invoice No. 4001105461, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 527

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON**

IN THE THIRD DEGREE in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a .22-caliber magazine (NYPD Invoice No. 4001105461, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 528

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens 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. 4001105461, Invoice Item 7), with a capacity of more than ten rounds of ammunition.

COUNT 529

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105461, Invoice Item 7), with a capacity of more than ten rounds of ammunition.

COUNT 530

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens 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. 4001105464, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 531

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105464, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 532

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens 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. 4001105464, Invoice Item 6), with a capacity of more than ten rounds of ammunition.

COUNT 533

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105464, Invoice Item 6), with a capacity of more than ten rounds of ammunition.

COUNT 534

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE**

THIRD DEGREE in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens 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. 4001105475, Invoice Item 2, Lab Item 2.1), with a capacity of more than ten rounds of ammunition.

COUNT 535

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105475, Invoice Item 2, Lab Item 2.1), with a capacity of more than ten rounds of ammunition.

COUNT 536

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens 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. 4001105475, Invoice Item 2, Lab Item 2.2), with a capacity of more than ten rounds of ammunition.

COUNT 537

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 16, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001105475, Invoice Item 2, Lab Item 2.2), with a capacity of more than ten rounds of ammunition.

COUNT 538

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §110.00 / 265.13(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, did attempt to unlawfully sell, exchange, give or dispose of to another ten or more firearms, to wit: seven 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743847, 743865, 743872, 743861, 743803, 439487,

and 453204), one 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), one .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), one 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), one 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and one 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

COUNT 539

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE** in violation of §110.00 / 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, did attempt to unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: seven 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743847, 743865, 743872, 743861, 743803, 439487, and 453204), one 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), one .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), one 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), one 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and one 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

COUNT 540

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A**

FIREARM IN THE SECOND DEGREE in violation of §110.00 / 265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, did attempt to unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: seven 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743847, 743865, 743872, 743861, 743803, 439487, and 453204), one 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), one .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), one 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), one 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and one 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

COUNT 541

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE** in violation of §265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens County, did attempt to unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: seven 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743847, 743865, 743872, 743861, 743803, 439487, and 453204), one 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), one .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), one 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), one 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and one 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

COUNT 542

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE FIRST DEGREE** in violation of §265.04(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess ten or more firearms, to wit: seven 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743847, 743865, 743872, 743861, 743803, 439487, and 453204), one 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), one .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), one 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), one 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and one 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

COUNT 543

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess five or more firearms, to wit: seven 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743847, 743865, 743872, 743861, 743803, 439487, and 453204), one 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), one .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), one 5.56x45mm caliber American Tactical Omni

Hybrid pistol (Serial No. NS240729), one 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and one 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

COUNT 544

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess three or more firearms, to wit: seven 9-millimeter Glock-style ghost gun pistols (NYPD Lead Seal Nos. 743847, 743865, 743872, 743861, 743803, 439487, and 453204), one 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), one .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), one 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), one 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and one 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

COUNT 545

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a

firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743847), with intent to sell it.

COUNT 546

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743847), and such possession took place outside the defendants' homes or places 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 547

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743847).

COUNT 548

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743865), with intent to sell it.

COUNT 549

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743865), and such possession took place outside the defendants' homes or places 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 550

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743865).

COUNT 551

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743872), with intent to sell it.

COUNT 552

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of

CRIMINAL POSSESSION OF A FIREARM in violation of §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, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743872).

COUNT 553

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743861), with intent to sell it.

COUNT 554

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743861).

COUNT 555

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743803), with intent to sell it.

COUNT 556

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743803), and such possession took place outside the defendants' homes or places 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 557

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 743803).

COUNT 558

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439487), with intent to sell it.

COUNT 559

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439487), and such possession took place outside the defendants' homes or places 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 560

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 439487).

COUNT 561

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 453204), with intent to sell it.

COUNT 562

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 453204), and such possession took place outside the defendants' homes or places 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 563

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Glock-style ghost gun pistol (NYPD Lead Seal No. 453204).

COUNT 564

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), with intent to sell it.

COUNT 565

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 9-millimeter Smith & Wesson rifle (Serial No. RSS0326), and such possession took place outside the defendants' homes or places 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 566

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Smith & Wesson rifle (Serial No. RSS0326).

COUNT 567

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a

firearm, to wit: a .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), with intent to sell it.

COUNT 568

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess an assault weapon, to wit: a .300 caliber American Tactical MilSport pistol (Serial No. MSA085429), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

COUNT 569

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a .300 caliber American Tactical MilSport pistol (Serial No. MSA085429).

COUNT 570

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), with intent to sell it.

COUNT 571

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), and such possession took place outside the defendants' homes or places 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 572

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess an assault weapon, to wit: a 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

COUNT 573

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 5.56x45mm caliber American Tactical Omni Hybrid pistol (Serial No. NS240729).

COUNT 574

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), with intent to sell it.

COUNT 575

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), and such possession took place outside the defendants' homes or places 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 576

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess an assault weapon, to wit: a 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, and has a telescoping brace, a capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

COUNT 577

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 5.56x45mm caliber Ruger AR-556 pistol (Serial No. 857-67436).

COUNT 578

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE** in violation of §265.11(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully possess a firearm, to wit: a 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959), with intent to sell it.

COUNT 579

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a loaded firearm, to wit: a loaded 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959), and such possession took place outside the defendants' homes or places 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 580

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess an assault weapon, to wit: a 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959), which has the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, and has a telescoping stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a muzzle compensator, or threaded barrel designed to accommodate a flash suppressor, muzzle brake, or muzzle compensator.

COUNT 581

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §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, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 5.56x45mm caliber Delton DTI-15 rifle (Serial # DTI-S296959).

COUNT 582

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** of the crime of **ATTEMPTED CRIMINAL SALE OF A**

FIREARM IN THE THIRD DEGREE in violation of §110.00 / 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens 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 large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112882, Invoice Item 3, Lab Item 13.1), with a capacity of more than ten rounds of ammunition.

COUNT 583

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112882, Invoice Item 3, Lab Item 13.1), with a capacity of more than ten rounds of ammunition.

COUNT 584

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

Said defendant, on or about June 6, 2024, in Queens 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 large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112882, Invoice Item 3, Lab Item 13.2), with a capacity of more than ten rounds of ammunition.

COUNT 585

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112882, Invoice Item 3, Lab Item 13.2), with a capacity of more than ten rounds of ammunition.

COUNT 586

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

Said defendant, on or about June 6, 2024, in Queens 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 large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112890, Invoice Item 3, Lab Item 17.1), with a capacity of more than ten rounds of ammunition.

COUNT 587

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112890, Invoice Item 3, Lab Item 17.1), with a capacity of more than ten rounds of ammunition.

COUNT 588

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

Said defendant, on or about June 6, 2024, in Queens 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 large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD

Invoice No. 4001112890, Invoice Item 3, Lab Item 17.2), with a capacity of more than ten rounds of ammunition.

COUNT 589

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112890, Invoice Item 3, Lab Item 17.2), with a capacity of more than ten rounds of ammunition.

COUNT 590

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

Said defendant, on or about June 6, 2024, in Queens 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 large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112893, Invoice Item 3, Lab Item 20.1), with a capacity of more than ten rounds of ammunition.

COUNT 591

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112893, Invoice Item 3, Lab Item 20.1), with a capacity of more than ten rounds of ammunition.

COUNT 592

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

Said defendant, on or about June 6, 2024, in Queens 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 large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112893, Invoice Item 3, Lab Item 20.2), with a capacity of more than ten rounds of ammunition.

COUNT 593

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112893, Invoice Item 3, Lab Item 20.2), with a capacity of more than ten rounds of ammunition.

COUNT 594

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

Said defendant, on or about June 6, 2024, in Queens 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 large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112902, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 595

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of

CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112902, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 596

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

Said defendant, on or about June 6, 2024, in Queens 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 large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112902, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 597

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112902, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 598

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

Said defendant, on or about June 6, 2024, in Queens 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 large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112888, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 599

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber

magazine (NYPD Invoice No. 4001112888, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 600

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

Said defendant, on or about June 6, 2024, in Queens 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 large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112888, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 601

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112888, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 602

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

Said defendant, on or about June 6, 2024, in Queens 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 large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112955, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 603

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112955, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 604

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendant, **MATEO CASTRO-AGUDELO** the crime of **ATTEMPTED CRIMINAL SALE OF A**

FIREARM IN THE THIRD DEGREE in violation of §110.00 / 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 6, 2024, in Queens 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 large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112955, Invoice Item 5), with a capacity of more than ten rounds of ammunition.

COUNT 605

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112955, Invoice Item 5), with a capacity of more than ten rounds of ammunition.

COUNT 606

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess an assault weapon, to wit: a 9-millimeter Smith & Wesson M&P FPC rifle (Serial # VA75233), which has the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, and has a folding stock, a pistol grip that protrudes conspicuously beneath the action of the weapon, and a threaded barrel designed to accommodate a flash suppressor, muzzle brake, or muzzle compensator.

COUNT 607

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter Smith & Wesson M&P FPC rifle (Serial # VA75233).

COUNT 608

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess an assault weapon, to wit: a 9-millimeter White Label Armory pistol (Serial # WPL00163), which has the following assault weapon characteristics: a semi-automatic pistol with the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol

grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer, and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearms with the non-trigger hand without being burned.

COUNT 609

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of §265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about June 6, 2024, in Queens County, did possess a firearm, to wit: a 9-millimeter White Label Armory pistol (Serial # WPL00163).

COUNT 610

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112829, Invoice Item 2, Lab Item 3.1), with a capacity of more than ten rounds of ammunition.

COUNT 611

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112829, Invoice Item 2, Lab Item 3.2), with a capacity of more than ten rounds of ammunition.

COUNT 612

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112829, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 613

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of

CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112840, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 614

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a .40-caliber magazine (NYPD Invoice No. 4001112840, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 615

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112840, Invoice Item 4), with a capacity of more than ten rounds of ammunition.

COUNT 616

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 5.56x45mm caliber magazine (NYPD Invoice No. 4001112840, Invoice Item 5), with a capacity of more than ten rounds of ammunition.

COUNT 617

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine

(NYPD Invoice No. 4001112813, Invoice Item 1 [1 of 4]), with a capacity of more than ten rounds of ammunition.

COUNT 618

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112813, Invoice Item 1 [2 of 4]), with a capacity of more than ten rounds of ammunition.

COUNT 619

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112813, Invoice Item 1 [3 of 4]), with a capacity of more than ten rounds of ammunition.

COUNT 620

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112813, Invoice Item 1 [4 of 4]), with a capacity of more than ten rounds of ammunition.

COUNT 621

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112813, Invoice Item 2), with a capacity of more than ten rounds of ammunition.

COUNT 622

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine (NYPD Invoice No. 4001112813, Invoice Item 3), with a capacity of more than ten rounds of ammunition.

COUNT 623

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a .22-caliber magazine (NYPD Invoice No. 4001112813, Invoice Item 13), with a capacity of more than ten rounds of ammunition.

COUNT 624

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a .556-caliber magazine (NYPD Invoice No. 4001112813, Invoice Item 14), with a capacity of more than ten rounds of ammunition.

COUNT 625

THE GRAND JURY OF QUEENS COUNTY, by this Indictment, accuses the defendants, **MATEO CASTRO-AGUDELO** and **HARGENY FERNANDEZ-GONZALEZ** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about June 6, 2024, in Queens County, did possess a large capacity ammunition feeding device, to wit: a 9-millimeter magazine

(NYPD Invoice No. 4001112813, Invoice Item 15), with a capacity of more than ten rounds of ammunition.

Dated: July 9, 2024
Queens County, New York

LETITIA JAMES
Attorney General
State of New York

By: _____
ANN K. LEE
Assistant Deputy Attorney General
Organized Crime Task Force