STATE OF NEW YORK COUNTY OF ONONDAGA

COUNTY COURT

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THE PEOPLE OF THE STATE OF NEW YORK

-against-

SEALED INDICTMENT Indict No. 2025-0734 (1-17)

Index No. 2025-10522

OCTF 24-009S

ETIEM BERRIOS CHASE CAHOON

CORY CHING

RONNIE EVANCIEW

TYLER FORSHEE

JOSHUA GOYETTE

JAQUAN JONES, a/k/a "FLAME"

GARY JORDAN

CODY LANE

NICOLE LIGHTHALL

ALEXANDER MEDINA

ANTONIO SANCHEZ

AUTUMN SCHNEIDER

HEATHER SHARPSTEEN

JOSHUA STIMPSON

ZACHARY THORNHILL

AMANDA VALENTI

Count One

THE GRAND JURY OF ONONDAGA COUNTY, by this indictment, accuses the defendants, ETIEM BERRIOS, RONNIE EVANCIEW, TYLER FORSHEE, JOSHUA GOYETTE, JAQUAN JONES, a/k/a "FLAME" (hereinafter "JAQUAN JONES"), GARY JORDAN, CODY LANE, NICOLE LIGHTHALL, ALEXANDER MEDINA, ANTONIO SANCHEZ, AUTUMN SCHNEIDER, HEATHER SHARPSTEEN, JOSHUA STIMPSON, ZACHARY THORNHILL, and AMANDA VALENTI of the crime of **CONSPIRACY IN THE SECOND DEGREE**, in violation of Section 105.15 of the Penal Law of the State of New York, committed as follows:

From on or before September 11, 2024, through on or about May 13, 2025, in Onondaga County, Cortland County, Madison County, Oneida County, and Tompkins County, in the State of New York and elsewhere, with intent that conduct constituting the crimes of Criminal Possession of a Controlled Substance in the First Degree, and/or Criminal Possession of a Controlled Substance in the Second Degree, and/or Criminal Sale of a Controlled Substance in the Second Degree, said crimes being Class A felonies, be committed, the defendants knowingly and intentionally agreed with each other and with others, known and unknown, to engage in or cause the performance of such conduct.

PREAMBLE

It was part of this conspiracy to possess narcotic drugs in amounts of four ounces or more and/or to possess methamphetamine in amounts of two ounces or more, and/or to sell narcotic drugs and/or methamphetamine in amounts of one-half ounce or more in Onondaga County, Cortland County, Madison County, Oneida County, and Tompkins County in the State of New York and elsewhere.

It was also part of this conspiracy for ANTONIO SANCHEZ to supply narcotic drugs to JAQUAN JONES and others.

It was also part of this conspiracy for JAQUAN JONES, to obtain narcotic drugs from ANTONIO SANCHEZ, to sell to others.

It was also part of this conspiracy for JAQUAN JONES to supply narcotic drugs and/or methamphetamine to ETIEM BERRIOS, CHASE CAHOON, CORY CHING, RONNIE EVANCIEW, TYLER FORSHEE, JOSHUA GOYETTE, GARY JORDAN, CODY LANE, NICOLE LIGHTHALL, AUTUMN SCHNEIDER, JOSHUA

STIMPSON, HEATHER SHARPSTEEN, ZACHARY THORNHILL, AMANDA VALENTI, and others.

It was also part of this conspiracy for ALEXANDER MEDINA to supply narcotic drugs to ETIEM BERRIOS and others.

It was also part of this conspiracy for ETIEM BERRIOS to procure narcotic drugs and methamphetamine from JAQUAN JONES, and narcotic drugs from ALEXANDER MEDINA to sell to others.

It was also part of this conspiracy for RONNIE EVANCIEW to obtain narcotic drugs and methamphetamine from JAQUAN JONES to sell to others.

It was also part of this conspiracy for TYLER FORSHEE to obtain narcotic drugs from JAQUAN JONES to sell to others.

It was also part of this conspiracy for JOSHUA GOYETTE to obtain narcotic drugs and methamphetamine from JAQUAN JONES to sell to others.

It was also part of this conspiracy for GARY JORDAN to obtain narcotic drugs and methamphetamine from JAQUAN JONES to sell to others.

It was also part of this conspiracy for CODY LANE to obtain narcotic drugs and methamphetamine from JAQUAN JONES to sell to others.

It was also part of this conspiracy for NICOLE LIGHTHALL to obtain narcotic drugs and methamphetamine from JAQUAN JONES to sell to others.

It was also part of this conspiracy for JOSHUA STIMPSON and AUTUMN SCHNEIDER to obtain narcotic drugs and methamphetamine from JAQUAN JONES to sell to others.

It was also part of this conspiracy for JOSHUA STIMPSON to direct Autumn Schneider, Daniel True, Daniel DePugh, and others in the sale and distribution of controlled substances.

It was also part of this conspiracy for HEATHER SHARPSTEEN to obtain narcotic drugs and methamphetamine from JAQUAN JONES to sell to others.

It was also part of this conspiracy for ZACHARY THORNHILL to obtain narcotic drugs and methamphetamine from JAQUAN JONES to sell to others.

It was also part of this conspiracy for AMANDA VALENTI to obtain narcotic drugs and methamphetamine from JAQUAN JONES to sell to others.

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

OVERT ACTS

In the furtherance of the conspiracy and to affect the objects thereof, from on or before September 11, 2024, through on or about May 13, 2025, the following overt acts, among others, were committed:

- 1. On or about and between September 11, 2024, and September 12, 2024, during a series of coded, guarded, and cryptic telephone communications, TYLER FORSHEE and JAQUAN JONES negotiated pricing for fentanyl purchases by TYLER FORSHEE from JAQUAN JONES.
- 2. On or about February 5, 2025, during a series of coded, guarded, and cryptic telephone communications, HEATHER SHARPSTEEN arranged to meet

JAQUAN JONES for a controlled substance transaction in the City of Syracuse (Onondaga County).

- 3. On or about September 14, 2024, during a series of coded, guarded, and cryptic telephone communications, RONNIE EVANCIEW requested that JAQUAN JONES supply him with "2 ounces" of methamphetamine, which he referred to as "eci", as well as two separate quantities of fentanyl, which he referred to as "blue" and "white," and JAQUAN JONES agreed to the sale.
- 4. On or about September 18, 2024, ZACHARY THORNHILL met JAQUAN JONES for a controlled substance transaction in the City of Syracuse (Onondaga County).
- 5. On or about September 18, 2024, GARY JORDAN possessed methamphetamine and fentanyl in the Town of Verona (Oneida County).
- 6. On or about September 20, 2024, TYLER FORSHEE met JAQUAN JONES for a controlled substance transaction in the City of Syracuse (Onondaga County).
- 7. On or about September 24, 2024, during a series of coded, guarded, and cryptic telephone communications, TYLER FORSHEE complained that JAQUAN JONES supplied him with fewer controlled substances than he paid for the previous evening, and requested that JAQUAN JONES not only supply him with the missing controlled substances, but also more powder cocaine, which he referred to as "soft", and separate quantities of blue and white fentanyl, and JAQUAN JONES agreed to the sale.

- 8. On or about September 26, 2024, during a series of coded, guarded, and cryptic telephone communications, JOSHUA GOYETTE requested that JAQUAN JONES supply him with methamphetamine, which he referred to as "cream", and JAQUAN JONES agreed to the sale.
- 9. On or about October 4, 2024, during a series of coded, guarded, and cryptic telephone communications, ETIEM BERRIOS requested that JAQUAN JONES supply him with three separate quantities of fentanyl, which he referred to as "blue", "white", and "purple", as well as cocaine, which he referred to as "chunk soft", and JAQUAN JONES agreed to the sale.
- 10. On or about October 4, 2024, JOSHUA GOYETTE met JAQUAN JONES for a controlled substance transaction in the City of Syracuse (Onondaga County).
- 11. On or about October 9, 2024, AMANDA VALENTI met JAQUAN JONES for a controlled substance transaction in the City of Syracuse (Onondaga County).
- 12. On or about October 15, 2024, during a series of coded, guarded, and cryptic telephone communications, NICOLE LIGHTHALL requested that JAQUAN JONES supply her with methamphetamine, which she referred to as "cream" and fentanyl, which she referred to as "food", and JAQUAN JONES agreed to the sale.
- 13. On or about October 16, 2024, NICOLE LIGHTHALL met JAQUAN JONES for a controlled substance transaction in the City of Syracuse (Onondaga County).

- 14. On or about October 18, 2024, during a series of coded, guarded, and cryptic telephone communications, AMANDA VALENTI requested that JAQUAN JONES supply her with six ounces of methamphetamine, which she referred to as "6 zips", and JAQUAN JONES agreed to the sale.
- 15. On or about October 21, 2024, during a series of coded, guarded, and cryptic telephone communications, JOSHUA STIMPSON ordered four pounds of methamphetamine, which he referred to as "4 big ones", and an ounce of powder cocaine, which he referred to as "28 of soft", from JAQUAN JONES and stated that he was sending AUTUMN SCHNEIDER with money to pay for the controlled substances, and JAQUAN JONES agreed to the sale.
- 16. On or about October 21, 2024, AUTUMN SCHNEIDER met JAQUAN JONES for a controlled substance transaction in the City of Syracuse (Onondaga County).
- 17. On or about October 27, 2024, during a series of coded, guarded, and cryptic telephone communications, ZACHARY THORNHILL requested that JAQUAN JONES supply him with an ounce of methamphetamine, which he referred to as "a zip of ice", and JAQUAN JONES agreed to the sale.
- 18. On or about October 30, 2024, NICOLE LIGHTHALL possessed fentanyl in the Town of Verona (Oneida County).
- 19. On or about November 2, 2024, GARY JORDAN, during a series of coded, guarded, and cryptic telephone communications, requested that JAQUAN JONES supply him with both methamphetamine, which he referred to as "ice cream"

and powder cocaine, which he referred to as "soft", and JAQUAN JONES agreed to the sale.

- 20. On or about November 6, 2024, AMANDA VALENTI possessed methamphetamine and fentanyl in the Town of Preble (Cortland County).
- 21. On or about November 6, 2024, ZACHARY THORNHILL possessed methamphetamine and fentanyl in the City of Syracuse (Onondaga County).
- 22. On or about November 8, 2024, during a series of coded, guarded, and cryptic telephone communications, JOSHUA GOYETTE arranged to meet JAQUAN JONES for a controlled substance transaction in the City of Syracuse (Onondaga County).
- 23. On or about November 19, 2024, during a series of coded, guarded, and cryptic telephone communications, JAQUAN JONES agreed to sell methamphetamine to Cory Ching in the City of Syracuse (Onondaga County).
- 24. On or about November 19, 2024, during a coded, guarded, and cryptic telephone communication, JOSHUA STIMPSON instructed Daniel True to screen his customers for "recent arrests" before sending them to STIMPSON for a controlled substance transaction, and True agreed.
- 25. On or about December 7, 2024, during a series of coded, guarded, and cryptic telephone communications, ETIEM BERRIOS requested that JAQUAN JONES supply him with both fentanyl, which he referred to as "new white" and methamphetamine, which he referred to as "cream", and JAQUAN JONES agreed to the sale.

- 26. On or about December 22, 2024, during a series of coded, guarded, and cryptic telephone communications, CODY LANE requested that JAQUAN JONES meet him for a controlled substance transaction, and JAQUAN JONES agreed to the sale.
- 27. On or about December 3, 2024, during a series of coded, guarded, and cryptic telephone communications, ETIEM BERRIOS requested that ALEXANDER MEDINA supply him with cocaine, which he referred to as "solid" and "s[o]ft", and ALEXANDER MEDINA agreed to the sale.
- 28. On or about December 5, 2024, HEATHER SHARPSTEEN possessed methamphetamine and fentanyl in the Town of Preble (Cortland County).
- 29. On or about December 14, 2024, during a series of coded, guarded, and cryptic telephone communications, ALEXANDER MEDINA offered to sell a controlled substance that he purported be "fire", meaning superior in quality, to ETIEM BERRIOS.
- 30. On or about December 16, 2024, during a series of coded, guarded, and cryptic telephone communications, GARY JORDAN requested that JAQUAN JONES supply him with methamphetamine, which he referred to as "ice cream", and cocaine, which he referred to as "soft", and JAQUAN JONES agreed to the sale.
- 31. On or about December 19, 2024, during a series of coded, guarded, and cryptic telephone communications, JAQUAN JONES agreed to sell methamphetamine to Chase Cahoon in the City of Syracuse (Onondaga County).

- 32. On or about January 5, 2025, ANTONIO SANCHEZ met JAQUAN JONES for a controlled substance transaction in the City of Syracuse (Onondaga County).
- 33. On or about January 10, 2025, during a series of coded, guarded, and cryptic telephone communications, RONNIE EVANCIEW requested that JAQUAN JONES supply him with powder cocaine, which he referred to as "soft", crack cocaine, which he referred to as "hard rock", and separate quantities of fentanyl, which he referred to as "purple" and "new white", and JAQUAN JONES agreed to the sale.
- 34. On or about January 24, 2025, JOSHUA STIMPSON met Daniel Depugh for a controlled substance transaction in the Town of Sullivan (Madison County).
- 35. On or about February 3, 2025, during a series of coded, guarded, and cryptic telephone communications, ALEXANDER MEDINA offered to sell cocaine to a customer at a price of \$30 per gram, \$100 for one-eighth ounce, which MEDINA referred to as a "ball", \$325 for one-half ounce, or \$650 per ounce.
- 36. On or about February 13, 2025, during a series of coded, guarded, and cryptic telephone communications, CODY LANE requested that JAQUAN JONES, supply him with various quantities of fentanyl, which he referred to as "white", "brown", and "purple", and JAQUAN JONES agreed to the sale.
- 37. On or about March 5, 2025, during a series of coded, guarded, and cryptic telephone communications, HEATHER SHARPSTEEN requested that JAQUAN JONES supply her with methamphetamine, which she referred to as "crème (sic)", and JAQUAN JONES agreed to the sale.

- 38. On or about March 12, 2025, JOSHUA STIMPSON and AUTUMN SCHNEIDER possessed fentanyl, cocaine, and methamphetamine at their residence in the Town of Sullivan (Madison County).
- 39. On or about March 21, 2025, CODY LANE possessed fentanyl and methamphetamine in the City of Rome (Oneida County).
- 40. On or about March 26, 2025, RONNIE EVANCIEW possessed fentanyl and methamphetamine in the City of Syracuse (Onondaga County).
- 41. On or about March 28, 2025, ANTONIO SANCHEZ possessed heroin and fentanyl in the Village of Liverpool (Onondaga County).
- 42. On or about April 3, 2025, AUTUMN SCHNEIDER possessed methamphetamine and cocaine in the Town of Dewitt (Onondaga County).
- 43. On or about and between April 3, 2025, and April 4, 2025, ETIEM BERRIOS possessed heroin, fentanyl, cocaine, and methamphetamine at his residence in the City of Syracuse (Onondaga County).
- 44. On or about April 9, 2025, ALEXANDER MEDINA possessed methamphetamine and cocaine at his residence in the City of Syracuse (Onondaga County).
- 45. On or about May 8, 2025, ANTONIO SANCHEZ met JAQUAN JONES for a controlled substance transaction in the City of Syracuse (Onondaga County).
- 46. On or about May 13, 2025, JAQUAN JONES possessed fentanyl and cocaine in the City of Syracuse (Onondaga County).

Count Two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **OPERATING AS A MAJOR TRAFFICKER** in violation of Section 220.77(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, from on or about the 18th day of December 2024, through on or about the 13th day of May 2025, in Onondaga County and elsewhere in the State of New York, acting as a profiteer, knowingly and unlawfully possessed, on one or more occasions within six months or less, a narcotic drug, to wit, cocaine and/or fentanyl, with intent to sell the same, and such narcotic drugs had a total aggregate value of seventy-five thousand dollars or more.

Count Three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA STIMPSON, of the crime of **OPERATING AS A MAJOR TRAFFICKER** in violation of Section 220.77(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, from on or about the 11th day of September 2024, through on or about the 13th day of May 2025, in Onondaga County, Madison County, and elsewhere, acted as director of a controlled substance organization, during which period such controlled substance organization sold one or more controlled substances, to wit: fentanyl, heroin, cocaine, and/or methamphetamine, and the proceeds collected or due from such sales had a total aggregate value of seventy-five thousand dollars or more.

Count Four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, TYLER FORSHEE, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 20th day of September 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine and/or fentanyl, with intent to sell it.

Count Five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, TYLER FORSHEE, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 23rd day of September 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine and/or fentanyl, with intent to sell it.

Count Six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of CRIMINAL SALE OF A

CONTROLLED SUBSTANCE IN THE SECOND DEGREE in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 5th day of December 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.18(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 5th day of December 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count Eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 5th day of December 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

Count Nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, HEATHER SHARPSTEEN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.18(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 5th day of December 2024, in the Town of Preble, Cortland County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count Ten

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, HEATHER SHARPSTEEN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 5th day of December 2024, in the Town of Preble, Cortland County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations,

compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Eleven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, HEATHER SHARPSTEEN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 5th day of December 2024, in the Town of Preble, Cortland County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with intent to sell it.

Count Twelve

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, HEATHER SHARPSTEEN, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 5th day of March 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl, with intent to sell it.

Count Thirteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, HEATHER SHARPSTEEN, of the crime of **ATTEMPTED CRIMINAL**

POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of Sections 110.00 and 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 5th day of March 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Fourteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA GOYETTE, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 4th day of October 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Fifteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA GOYETTE, of the crime of **CRIMINAL POSSESSION OF A**

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

Said defendant, on or about the 8th day of November 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with intent to sell it.

Count Sixteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 18th day of September 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Seventeen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.18(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 18th day of September 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more

preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count Eighteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 18th day of September 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Nineteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, GARY JORDAN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.18(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 18th day of September 2024, in the Town of Verona, Oneida County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count Twenty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, GARY JORDAN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 18th day of September 2024, in the Town of Verona, Oneida County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Twenty-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, GARY JORDAN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 18th day of September 2024, in the Town of Verona, Oneida County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Twenty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, GARY JORDAN, of the crime of **CRIMINALLY USING DRUG**

PARAPHERNALIA IN THE SECOND DEGREE in violation of Section 220.50(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 18th day of September 2024, in the Town of Verona, Oneida County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count Twenty-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, GARY JORDAN, of the crime of **ENDANGERING THE WELFARE OF A CHILD** in violation of Section 260.10(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 18th day of September 2024, in the Town of Verona, Oneida County, knowingly acted in a manner likely to be injurious to the physical, mental or moral welfare of a child less than seventeen years old.

Count Twenty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, GARY JORDAN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 17th day of November 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Twenty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, GARY JORDAN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 17th day of November 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Twenty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, NICOLE LIGHTHALL, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 16th day of October 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl, with intent to sell it.

Count Twenty-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, NICOLE LIGHTHALL, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**in violation of Sections 110.00 and 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 16th day of October 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Twenty-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 30th day of October 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more

preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Twenty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 30th day of October 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

Count Thirty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, NICOLE LIGHTHALL, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**in violation of Sections 110.00 and 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 30th day of October 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said

preparations, compounds, mixtures or substances were of an aggregate weight of oneeighth ounce or more.

Count Thirty-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, NICOLE LIGHTHALL, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 30th day of October 2024, in the Town of Verona, Oneida County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with intent to sell it.

Count Thirty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ZACHARY THORNHILL, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 18th day of September 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl, with intent to sell it.

Count Thirty-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ZACHARY THORNHILL, of the crime of **ATTEMPTED CRIMINAL**

POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of Sections 110.00 and 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 18th day of September 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Thirty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of November 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Thirty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of CRIMINAL SALE OF A

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

Said defendant, on or about the 6th day of November 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

Count Thirty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ZACHARY THORNHILL, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of November 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with intent to sell it.

Count Thirty-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ZACHARY THORNHILL, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of November 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations,

compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Thirty-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ZACHARY THORNHILL, of the crime of **CRIMINAL POSSESSION OF**A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE in violation of Section 220.09(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of November 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Thirty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ZACHARY THORNHILL, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of November 2024, in the City of Syracuse, Onondaga County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person

intended to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count Forty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ZACHARY THORNHILL, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of November 2024, in the City of Syracuse, Onondaga County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count Forty-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, AMANDA VALENTI, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of October 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl, with intent to sell it.

Count Forty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of November 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Forty-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of November 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

Count Forty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, AMANDA VALENTI, of the crime of **CRIMINAL POSSESSION OF A**

CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of November 2024, in the Town of Preble, Cortland County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Forty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, AMANDA VALENTI, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of November 2024, in the Town of Preble, Cortland County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Forty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, AMANDA VALENTI, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of November 2024, in the Town of Preble, Cortland County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with intent to sell it.

Count Forty-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 19th day of November 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Forty-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CORY CHING, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 19th day of November 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations,

compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Forty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CORY CHING, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 19th day of November 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Fifty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 30th day of October 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Fifty-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 19th day of December 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Fifty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CHASE CAHOON, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 19th day of December 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Fifty-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CHASE CAHOON, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 19th day of December 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Fifty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RONNIE EVANCIEW, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 4th day of November 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl and/or cocaine, with intent to sell it.

Count Fifty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of CRIMINAL SALE OF A

CONTROLLED SUBSTANCE IN THE SECOND DEGREE in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 26th day of March 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing a narcotic drug, to wit: fentanyl, and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Fifty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 26th day of March 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Fifty-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RONNIE EVANCIEW, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 26th day of March 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with intent to sell it.

Count Fifty-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RONNIE EVANCIEW, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 26th day of March 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Fifty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RONNIE EVANCIEW, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 26th day of March 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Sixty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RONNIE EVANCIEW, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 26th day of March 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Sixty-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CODY LANE, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 13th day of February 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl, with intent to sell it.

Count Sixty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 21st day of March 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing a narcotic drug, to wit: fentanyl, and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Sixty-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 21st day of March 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Sixty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CODY LANE, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 21st day of March 2025, in the City of Rome, Oneida County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with intent to sell it.

Count Sixty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CODY LANE, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 21st day of March 2025, in the City of Rome, Oneida County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Sixty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CODY LANE, of the crime of **CRIMINAL POSSESSION OF A**

CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 21st day of March 2025, in the City of Rome, Oneida County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Sixty-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CODY LANE, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 21st day of March 2025, in the City of Rome, Oneida County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Sixty-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JOSHUA STIMPSON and AUTUMN SCHNEIDER, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST

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

Said defendants, acting in concert, on or about the 12th day of March 2025, in the Town of Sullivan, Madison County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl and cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

Count Sixty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JOSHUA STIMPSON and AUTUMN SCHNEIDER, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert on or about the 12th day of March 2025, in the Town of Sullivan, Madison County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl and/or cocaine, with intent to sell it.

Count Seventy

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JOSHUA STIMPSON and AUTUMN SCHNEIDER, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.18(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about the 12th day of March 2025, in the Town of Sullivan, Madison County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count Seventy-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JOSHUA STIMPSON and AUTUMN SCHNEIDER, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert on or about the 12th day of March 2025, in the Town of Sullivan, Madison County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Seventy-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JOSHUA STIMPSON and AUTUMN SCHNEIDER, of the crime of CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE

in violation of Section 220.50(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about the 12th day of March 2025, in the Town of Sullivan, Madison County, knowingly possessed diluents, dilutants or adulterants, including but not limited to, any of the following: quinine hydrochloride, mannitol, mannite, lactose or dextrose, adapted for the dilution of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

Count Seventy-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JOSHUA STIMPSON and AUTUMN SCHNEIDER, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about the 12th day of March 2025, in the Town of Sullivan, Madison County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person

intended to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count Seventy-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JOSHUA STIMPSON and AUTUMN SCHNEIDER, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about the 12th day of March 2025, in the Town of Sullivan, Madison County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count Seventy-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 3rd day of April 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers

or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Seventy-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.18(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 3rd day of April 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count Seventy-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 3rd day of April 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing a narcotic drug, to wit: cocaine, and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Seventy-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 3rd day of April 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Seventy-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, AUTUMN SCHNEIDER, of the crime of **CRIMINAL POSSESSION OF**A CONTROLLED SUBSTANCE IN THE SECOND DEGREE in violation of Section 220.18(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 3rd day of April 2025, in the Town of Dewitt, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count Eighty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, AUTUMN SCHNEIDER, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 3rd day of April 2025, in the Town of Dewitt, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Eighty-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, AUTUMN SCHNEIDER, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 3rd day of April 2025, in the Town of Dewitt, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Eighty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, AUTUMN SCHNEIDER, of the crime of **CRIMINAL POSSESSION OF**

A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 3rd day of April 2025, in the Town of Dewitt, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Eighty-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA STIMPSON, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 24th day of January 2025, in the Town of Sullivan, Madison County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl and/or heroin.

Count Eighty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 7th day of December 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more

preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Eighty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.18(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 7th day of December 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count Eighty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 7th day of December 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

Count Eighty-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.18(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 7th day of December 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count Eighty-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 7th day of December 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Eighty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 7th day of December 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with intent to sell it.

Count Ninety

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 7th day of December 2024, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Ninety-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, 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 and between the 3rd day of April and the 4th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed a loaded firearm, to wit: a loaded H&K .22 Long Rifle High Velocity caliber firearm, in violation of Section 265.02(1) of the Penal Law of the State of New York.

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 Ninety-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, of the crime of **CRIMINAL POSSESSION OF A**WEAPON IN THE THIRD DEGREE in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 3rd day of April, and the 4th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed a firearm, to wit: an H&K .22 Long Rifle High Velocity caliber firearm.

Count Ninety-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, 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 the 3rd day of April and the 4th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed an assault weapon, to wit: an H&K .22 Long Rifle High Velocity caliber firearm, which has the ability to accept a detachable magazine and the following characteristics: a pistol grip that protrudes conspicuously beneath the action; and/or a flash suppressor, muzzle break, muzzle compensator, or threaded barrel designed to accommodate a flash suppressor, muzzle break, or muzzle compensator; and/or the capacity to accept an ammunition magazine that attaches outside of the pistol grip; and/or a manufactured weight of fifty ounces or more when unloaded; and/or a shroud that is attached to, or partially or completely encircles the barrel and that permits holding the firearm with the non-trigger hand without being burned.

Count Ninety-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, of the crime of **CRIMINAL POSSESSION OF A**WEAPON IN THE THIRD DEGREE in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 3rd day of April and the 4th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed a large capacity ammunition feeding device, to wit: an H&K magazine with a capacity of more than ten rounds of ammunition.

Count Ninety-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, of the crime of **CRIMINAL POSSESSION OF A**WEAPON IN THE THIRD DEGREE in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 3rd day of April, and the 4th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed a large capacity ammunition feeding device, to wit: a Walther magazine with a capacity of more than ten rounds of ammunition.

Count Ninety-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 3rd day of April and the 4th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed a firearm, to wit: an H&K .22 Long Rifle High Velocity caliber firearm.

Count Ninety-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.18(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 3rd day of April and the 4th day of April 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

Count Ninety-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 3rd day of April and the 4th day of April 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, heroin, and/or fentanyl, with intent to sell it.

Count Ninety-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 3rd day of April and the 4th day of April 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing

methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count One hundred

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 3rd day of April and the 4th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed diluents, dilutants or adulterants, including but not limited to, any of the following: quinine hydrochloride, mannitol, mannite, lactose or dextrose, adapted for the dilution of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

Count One hundred one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 3rd day of April and the 4th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intended to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count One hundred two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ETIEM BERRIOS, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 3rd day of April and the 4th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count One hundred three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ALEXANDER MEDINA, 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 the 9th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed a loaded firearm, to wit: a loaded Glock 9x19mm caliber pistol, model 43X, in violation of Section 265.02(1) of the Penal Law of the State of New York.

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 One hundred four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ALEXANDER MEDINA, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed a firearm, to wit: a Glock 9x19mm caliber pistol, model 43X.

Count One hundred five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ALEXANDER MEDINA, of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed a firearm, to wit: a Glock 9x19mm caliber pistol, model 43X.

Count One hundred six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ALEXANDER MEDINA, 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 the 9th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed a loaded firearm, to wit: a loaded Anderson Manufacturing 5.56x45mm NATO caliber firearm, model AM-15, in violation of Section 265.02(1) of the Penal Law of the State of New York.

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 One hundred seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ALEXANDER MEDINA, 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 the 9th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed an assault weapon, to wit: an Anderson Manufacturing 5.56x45mm NATO caliber firearm, model AM-15, which has the ability to accept a detachable magazine and the following characteristics: a pistol grip that protrudes conspicuously beneath the action; and/or a flash suppressor, muzzle break, muzzle compensator, or threaded barrel designed to accommodate a flash suppressor, muzzle break, or muzzle compensator; and/or the capacity to accept an ammunition magazine that attaches outside of the pistol grip; and/or a manufactured weight of fifty ounces or more when unloaded; and/or a shroud that is attached to, or partially or completely encircles the barrel and that permits holding the firearm with the non-trigger hand without being burned.

Count One hundred eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ALEXANDER MEDINA, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed a firearm, to wit: an Anderson Manufacturing 5.56x45mm NATO caliber firearm, model AM-15.

Count One hundred nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ALEXANDER MEDINA, of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed a firearm, to wit: an Anderson Manufacturing 5.56x45mm NATO caliber firearm, model AM-15.

Count One hundred ten

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ALEXANDER MEDINA of the crime of **CRIMINAL POSSESSION OF**A CONTROLLED SUBSTANCE IN THE SECOND DEGREE in violation of Section 220.18(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of April 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count One hundred eleven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ALEXANDER MEDINA, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of April 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count One hundred twelve

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ALEXANDER MEDINA of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of April 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count One hundred thirteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ALEXANDER MEDINA, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of April 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count One hundred fourteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, ALEXANDER MEDINA, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of April 2025, in the City of Syracuse, Onondaga County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count One hundred fifteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ANTONIO SANCHEZ, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 31st day of March 2025, in the Village of Liverpool, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin and/or fentanyl, with intent to sell it.

Count One hundred sixteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ANTONIO SANCHEZ, of the crime of **CRIMINAL POSSESSION OF A**

CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 31st day of March 2025, in the Village of Liverpool, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: heroin and/or fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count One hundred seventeen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ANTONIO SANCHEZ, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 31st day of March 2025, in the Village of Liverpool, Onondaga County, knowingly possessed diluents, dilutants or adulterants, including but not limited to, any of the following: quinine hydrochloride, mannitol, mannite, lactose or dextrose, adapted for the dilution of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

Count One hundred eighteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ANTONIO SANCHEZ, of the crime of **CRIMINALLY USING DRUG**

PARAPHERNALIA IN THE SECOND DEGREE in violation of Section 220.50(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 31st day of March 2025, in the Village of Liverpool, Onondaga County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intended to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count One hundred nineteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ANTONIO SANCHEZ, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 31st day of March 2025, in the Village of Liverpool, Onondaga County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count One hundred twenty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of Section 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 13th day of May 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

Count One hundred twenty-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of Section 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 13th day of May 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

Count One hundred twenty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 13th day of May 2025, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl and/or cocaine, with intent to sell it.

Count One hundred twenty-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 13th day of May 2025, in the City of Syracuse, Onondaga County, knowingly possessed diluents, dilutants or adulterants, including but not limited to, any of the following: quinine hydrochloride, mannitol, mannite, lactose or dextrose, adapted for the dilution of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

Count One hundred twenty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 13th day of May 2025, in the City of Syracuse, Onondaga County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intended to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count One hundred twenty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAQUAN JONES, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 13th day of May 2025, in the City of Syracuse, Onondaga County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some

person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Dated: October 3, 2025

Syracuse, New York

NICOLE KEARY

Deputy Attorney General Organized Crime Task Force

By:

JENNIFER HYATT

Assistant Deputy Attorney General Organized Crime Task Force 300 South State Street, Suite 300 Syracuse, NY 13202

GRAND JURY FOREPERSON

Dated: October 3, 2025