

STATE OF NEW YORK : COUNTY OF ULSTER
COUNTY COURT

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

-against-

ULSTER COUNTY
INDICTMENT
NUMBER
_____/2026

- X. JORGE LEE A/K/A “JUNIOR”;
- X. MICHAEL P. FELICELLO;
- X. LAWRENCE A. FALCETTA, JR.;
- X. ERNESTO R. RODRIGUEZ, JR. A/K/A ERNESTO REYES RODRIGUEZ;
- X. JOSE A. GARCIA;
- X. MICHAEL BROWN;
- X. JOSHUA A. MINTZ;
- X. ERIC S. OREMUS;
- X. JOHN J. DANGELO, II; and
- X. DEBORAH A. FOSTER;

DEFENDANTS.

-----X

COUNT 1

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE A/K/A “JUNIOR”, MICHAEL P. FELICELLO, LAWRENCE A. FALCETTA, JR., ERNESTO R. RODRIGUEZ, JR. A/K/A ERNESTO REYES RODRIGUEZ, JOSE A. GARCIA, and MICHAEL BROWN** of the crime of **CONSPIRACY IN THE SECOND DEGREE**, in violation of Section 105.15 of the Penal Law of the State of New York, committed as follows:

On or about and between August 7, 2025 and September 2, 2026, in Ulster County and Orange County, in the State of New York, with intent that conduct constituting the crimes of Criminal Sale of a Controlled Substance in the First

Degree, in violation of Section 220.43(1) of the Penal Law of New York, Criminal Sale of a Controlled Substance in the Second Degree, in violation of Section 220.41(1) of the Penal Law of New York, and/or Criminal Possession of a Controlled Substance in the Second Degree in violation of Section 220.18(1) of the Penal Law of New York, said crimes being Class A Felonies, be committed, the defendants did knowingly and intentionally agree with each other, and with other individuals known to the Grand Jury, to engage in and cause the performance of such conduct as would constitute the above-mentioned Class A Felonies.

PREAMBLE

It was the purpose of this conspiracy to acquire, possess, and sell cocaine in quantities of at least one-half ounce or more, in Ulster County and Orange County, in the State of New York.

It was the role of **JORGE LEE A/K/A “JUNIOR”** to possess, prepare, transport, and supply cocaine to **MICHAEL P. FELICELLO, LAWRENCE A. FALCETTA, JR.,** and **ERNESTO R. RODRIGUEZ, JR. A/K/A ERNESTO REYES RODRIGUEZ,** and to collect the proceeds from selling cocaine from **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**

It was the role of **MICHAEL P. FELICELLO** to possess, transport, and supply cocaine to **LAWRENCE A. FALCETTA, JR.** and to Individual 1 who is known to the Grand Jury, and to collect the proceeds from selling cocaine to Individual 1 who is known to the Grand Jury. Additionally, it was the role of

MICHAEL P. FELICELLO to obtain cocaine from **LAWRENCE A. FALCETTA, JR.** and **JORGE LEE A/K/A “JUNIOR”** for redistribution to other individuals.

It was the role of **LAWRENCE A. FALCETTA, JR.** to possess, prepare, and supply cocaine to **MICHAEL P. FELICELLO**, and to collect the proceeds from selling cocaine from **MICHAEL P. FELICELLO**.

It was the role of **ERNESTO R. RODRIGUEZ, JR. A/K/A ERNESTO REYES RODRIGUEZ** to possess and sell cocaine to Individual 2 who is known to the Grand Jury.

It was the role of **JOSE A. GARCIA** to possess, prepare, transport, and supply cocaine to **MICHAEL BROWN** and **MICHAEL P. FELICELLO**, and to collect the proceeds from selling cocaine from **MICHAEL BROWN**.

It was the role of **MICHAEL BROWN** to possess, transport, and supply cocaine to **MICHAEL P. FELICELLO**, and to collect the proceeds from selling cocaine from **MICHAEL P. FELICELLO**.

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 to schedule cocaine transactions.

OVERT ACTS

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

1. On or about August 7, 2025, in Ulster County, **MICHAEL P. FELICELLO** utilized a red Chevrolet Silverado bearing New York State Registration

XB2282 to obtain a quantity of cocaine from **LAWRENCE A. FALCETTA, JR.**

2. On or about December 30, 2025, in Ulster County, **LAWRENCE A. FALCETTA, JR.** sold a quantity of cocaine that weighed in excess of two ounces to **MICHAEL P. FELICELLO**.
3. On or about December 30, 2025, in Ulster County, **MICHAEL P. FELICELLO**, sold a quantity of cocaine to Individual 1 who is known to the Grand Jury.
4. On or about January 11, 2026, **JOSE A. GARCIA** utilized a cellular telephone to speak with and arrange a cocaine sale to **MICHAEL BROWN** at Whoo's Bar & Grill, in Orange County.
5. On or about January 11, 2026, **MICHAEL BROWN** utilized a cellular telephone to speak with and arrange a cocaine sale to **MICHAEL P. FELICELLO** at Whoo's Bar & Grill, in Orange County.
6. On or about February 23, 2026, in Ulster County, **JORGE LEE A/K/A "JUNIOR"** sold a quantity of cocaine to **LAWRENCE A. FALCETTA, JR.**
7. On or about March 15, 2026, in Orange County, **JOSE A. GARCIA** utilized a maroon Toyota Rav4, bearing New York State Registration KPN6689, to store and transport one-half ounce of cocaine in an attempt to sell said cocaine to **MICHAEL BROWN**.

8. On or about March 15, 2026, in Orange County, **JOSE A. GARCIA** utilized a white Ford F150, bearing New York State Registration KSZ1585, to store, transport, and sell one-half ounce of cocaine to **MICHAEL BROWN**.
9. On or about March 20, 2026, in Orange County, **JORGE LEE A/K/A “JUNIOR”** utilized a gray GMC Sierra, bearing New York State Registration LRN6262, to sell a quantity of cocaine to **MICHAEL P. FELICELLO**.
10. On or about March 20, 2026, **MICHAEL P. FELICELLO** used a cellular telephone to call and inform **LAWRENCE A. FALCETTA, JR.** that **JORGE LEE A/K/A “JUNIOR”**, supplied **MICHAEL P. FELICELLO** with cocaine for redistribution to **LAWRENCE A. FALCETTA, JR.**
11. On or about August 7, 2026, in Ulster County, **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, on behalf of **JORGE LEE A/K/A “JUNIOR”** sold a quantity of cocaine to Individual 2 who is known to the Grand Jury.
12. On or about August 11, 2026, in Ulster County, **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, on behalf of **JORGE LEE A/K/A “JUNIOR”**, sold a quantity of cocaine to Individual 2 who is known to the Grand Jury.

COUNT 2

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE**

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

Said defendants, acting in concert with each other, on or about August 7, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 3

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.** of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 7, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 4

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.** 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 defendants, acting in concert with each other, on or about August 7, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and

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

COUNT 5

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO** 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 August 18, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 6

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO** 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 August 18, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 7

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO** of the crime of **CRIMINAL POSSESSION**

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

Said defendant, on or about August 18, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 8

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 August 18, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 9

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 September 4, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations,

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

COUNT 10

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

Said defendant, on or about September 4, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 11

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

Said defendant, on or about September 4, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 12

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

Said defendant, on or about September 4, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 13

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 September 18, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 14

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

Said defendant, on or about September 18, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 15

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

Said defendant, on or about September 18, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 16

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

Said defendant, on or about September 18, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 17

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 October 9, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 18

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 October 9, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 19

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 October 9, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 20

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 October 9, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 21

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 November 4, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 22

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 November 4, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 23

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 November 4, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 24

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 November 4, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 25

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 15, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 26

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 15, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 27

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 15, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 28

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 15, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 29

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 30

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 31

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 32

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 33

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 34

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 35

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE**

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

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 36

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 37

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 38

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 39

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 January 2, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances

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

COUNT 40

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

Said defendant, on or about January 2, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 41

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 2, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 42

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about January 2, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 43

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 January 4, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 44

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

Said defendant, on or about January 4, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 45

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 4, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 46

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 4, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 47

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 January 23, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 48

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

Said defendant, on or about January 23, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 49

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 23, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 50

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 23, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 51

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 February 25, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations,

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

COUNT 52

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 February 25, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 53

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 25, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 54

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about February 25, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 55

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”**, 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 February 27, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 56

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”**, **MICHAEL P. FELICELLO**, and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 27, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 57

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”, MICHAEL P. FELICELLO, and LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 27, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 58

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 March 1, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances

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

COUNT 59

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 March 1, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 60

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 1, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 61

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about March 1, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 62

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 March 18, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 63

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 March 18, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 64

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 18, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 65

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 18, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 66

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE A/K/A “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 67

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 68

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE A/K/A “JUNIOR”** and **MICHAEL P. FELICELLO**, of

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

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 69

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE A/K/A “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 70

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about March 20, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 71

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 72

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 11, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 73

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 11, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 74

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 11, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 75

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 11, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 76

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

Said defendant, on or about January 26, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 77

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

Said defendant, on or about January 26, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 78

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL BROWN**, 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 February 20, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 79

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL BROWN**, 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 February 20, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 80

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 20, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 81

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 20, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 82

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 24, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 83

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 24, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 84

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 24, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 85

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 24, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 86

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **ATTEMPTED CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 110.00/220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully attempt to sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 87

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JOSE A. GARCIA**, 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 March 15, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 88

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND**

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

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 89

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 90

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 91

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 92

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA and MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations,

compounds, mixtures or substances containing a narcotic drug, to wit: cocaine sale #1, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 93

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine sale #1.

COUNT 94

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine sale #1, with intent to sell it.

COUNT 95

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine sale #1, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 96

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA and MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine sale #2, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 97

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine sale #2.

COUNT 98

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine sale #2, with intent to sell it.

COUNT 99

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED**

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

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine sale #2, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 100

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JOSE A. GARCIA**, 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 April 22, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 101

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 April 20, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 102

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 April 20, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 103

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 21, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 104

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 April 21, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 105

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 April 21, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

COUNT 106

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 April 21, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 107

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 April 21, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 108

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 15, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 109

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 15, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 110

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 15, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 111

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 15, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 112

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 27, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances

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

COUNT 113

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 May 27, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 114

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 27, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 115

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 May 27, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 116

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 July 1, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 117

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about July 1, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 118

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 July 1, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 119

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about July 16, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 120

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 July 16, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 121

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about July 16, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 122

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 July 16, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 123

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 7, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 124

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL SALE OF A**

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

Said defendants, acting in concert with each other, on or about August 7, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 125

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 7, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 126

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 7, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 127

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 11, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 128

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 11, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 129

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 11, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 130

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 11, 2026, in Ulster County, did knowingly and unlawfully possess one or more

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

COUNT 131

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 2, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 132

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 September 2, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations,

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

COUNT 133

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.18(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 2, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

COUNT 134

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 2, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 135

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 2, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 136

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSHUA A. MINTZ, ERIC S. OREMUS, JOHN J. DANGELO, II, and DEBORAH A. FOSTER** of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Section 105.10, Subdivision (1) of the Penal Law of the State of New York, committed as follows:

On or about and between December 8, 2025, and February 5, 2026, in Ulster County and Orange County, in the State of New York, with intent that conduct constituting the crimes of Criminal Sale of a Controlled Substance in the Third Degree, in violation of Section 220.39(1) of the Penal Law of New York, and Criminal Possession of a Controlled Substance in the Third Degree in violation of Section

220.16(1) of the Penal Law of New York, said crimes being Class B Felonies, be committed, the defendants did knowingly and intentionally agree with each other, and other individuals known to the Grand Jury, to engage in and cause the performance of such conduct as would constitute the above-mentioned Class B Felonies.

PREAMBLE

It was the purpose of this conspiracy to acquire, possess, and sell cocaine, in Ulster County, and elsewhere inside the State of New York.

It was the role of **MICHAEL P. FELICELLO** to possess, prepare, transport, and sell cocaine to and to collect the proceeds from selling cocaine to **JOSHUA A. MINTZ, ERIC S. OREMUS, JOHN J. DANGELO, II, and DEBORAH A. FOSTER.**

It was the role of **JOSHUA A. MINTZ, ERIC S. OREMUS, JOHN J. DANGELO, II, and DEBORAH A. FOSTER** to source and redistribute cocaine obtained from **MICHAEL P. FELICELLO** 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 to schedule cocaine transactions.

OVERT ACTS

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

1. On or about December 14, 2025, in Orange County, **ERIC S. OREMUS** utilized a red Mazda3, bearing New York State Registration JFD2613, to purchase, store, and transport a quantity of cocaine from **MICHAEL P. FELICELLO**.
2. On or about December 29, 2025, **JOSHUA A. MINTZ** utilized a cellular telephone to call **MICHAEL P. FELICELLO** and attempt to arrange a cocaine transaction, saying “I didn’t know if you had any of your, uh, that, that—your stuff, the white stuff.”
3. On or about January 11, 2026, **DEBORAH A. FOSTER** utilized a cellular telephone to exchange SMS text messages with, and to arrange a cocaine purchase from, **MICHAEL P. FELICELLO**.
4. On or about January 11, 2026, in Ulster County, **DEBORAH A. FOSTER** traveled to **MICHAEL P. FELICELLO’S** residence to purchase cocaine from **MICHAEL P. FELICELLO**.
5. On or about January 23, 2026, **ERIC S. OREMUS** utilized a cellular telephone to speak with, and arrange a cocaine purchase from, **MICHAEL P. FELICELLO**.
6. On or about January 23, 2026, **ERIC S. OREMUS** utilized a red Mazda3, bearing New York State Registration JFD2613, to store and transport a quantity of cocaine from Orange County to Ulster County.

7. On or about January 29, 2026, **JOHN J. DANGELO, II** utilized a cellular telephone to speak with, and arrange a cocaine purchase from, **MICHAEL P. FELICELLO**.
8. On or about January 29, 2026, in Orange County, **JOHN J. DANGELO, II** utilized a white BMW X1, bearing New York State Registration LJZ5935, to store and transport a quantity of cocaine.
9. On or about January 30, 2026, **JOSHUA A. MINTZ** utilized a cellular telephone to speak with, and arrange a cocaine purchase from, **MICHAEL P. FELICELLO**.
10. On or about February 1, 2026, in Orange County, **JOSHUA A. MINTZ** entered RMC Trucking Inc. property to retrieve cocaine from **MICHAEL P. FELICELLO**.
11. On or about February 3, 2026, **JOSHUA A. MINTZ** utilized a cellular telephone to arrange a cocaine purchase from **MICHAEL P. FELICELLO** via a series of SMS text messages and phone calls.

COUNT 137

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

Said defendant, on or about January 30, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 138

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **JOSHUA A. MINTZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 30, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 139

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **JOSHUA A. MINTZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 30, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 140

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 February 1, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 141

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **JOSHUA A. MINTZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 1, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 142

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 February 3, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 143

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **JOSHUA A. MINTZ**, 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 defendants, acting in concert with each other, on or about February 3, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

COUNT 144

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **ERIC S. OREMUS**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 23, 2026, in Orange County and Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 145

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **ERIC S. OREMUS**, 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 defendants, acting in concert with each other, on or about January 23, 2026, in Orange County and Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

COUNT 146

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

Said defendant, on or about January 29, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 147

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL POSSESSION**

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

Said defendant, on or about January 29, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 148

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

Said defendant, on or about January 8, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 149

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **DEBORAH A. FOSTER**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 8, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 150

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

Said defendant, on or about January 10, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 151

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **DEBORAH A. FOSTER**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 10, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 152

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

Said defendant, on or about January 14, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 153

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **DEBORAH A. FOSTER**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 14, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

Dated: September __, 2026
Ulster County, New York

NICOLE KEARY
Deputy Attorney General
Organized Crime Task Force

By: _____
SCOTT R. JOHNSON, ESQ.
Assistant Deputy Attorney General
Organized Crime Task Force

A TRUE BILL

GRAND JURY FOREPERSON
Dated: September __, 2026

STATE OF NEW YORK : COUNTY OF ULSTER
COUNTY COURT

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

-against-

ULSTER COUNTY
INDICTMENT
NUMBER
_____/2026

- X. JORGE LEE A/K/A “JUNIOR”;
- X. MICHAEL P. FELICELLO;
- X. LAWRENCE A. FALCETTA, JR.;
- X. ERNESTO R. RODRIGUEZ, JR. A/K/A ERNESTO REYES RODRIGUEZ;
- X. JOSE A. GARCIA;
- X. MICHAEL BROWN;
- X. JOSHUA A. MINTZ;
- X. ERIC S. OREMUS;
- X. JOHN J. DANGELO, II; and
- X. DEBORAH A. FOSTER;

DEFENDANTS.

-----X

COUNT 1

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE A/K/A “JUNIOR”, MICHAEL P. FELICELLO, LAWRENCE A. FALCETTA, JR., ERNESTO R. RODRIGUEZ, JR. A/K/A ERNESTO REYES RODRIGUEZ, JOSE A. GARCIA, and MICHAEL BROWN** of the crime of **CONSPIRACY IN THE SECOND DEGREE**, in violation of Section 105.15 of the Penal Law of the State of New York, committed as follows:

On or about and between August 7, 2025 and September 2, 2026, in Ulster County and Orange County, in the State of New York, with intent that conduct constituting the crimes of Criminal Sale of a Controlled Substance in the First

Degree, in violation of Section 220.43(1) of the Penal Law of New York, Criminal Sale of a Controlled Substance in the Second Degree, in violation of Section 220.41(1) of the Penal Law of New York, and/or Criminal Possession of a Controlled Substance in the Second Degree in violation of Section 220.18(1) of the Penal Law of New York, said crimes being Class A Felonies, be committed, the defendants did knowingly and intentionally agree with each other, and with other individuals known to the Grand Jury, to engage in and cause the performance of such conduct as would constitute the above-mentioned Class A Felonies.

PREAMBLE

It was the purpose of this conspiracy to acquire, possess, and sell cocaine in quantities of at least one-half ounce or more, in Ulster County and Orange County, in the State of New York.

It was the role of **JORGE LEE A/K/A “JUNIOR”** to possess, prepare, transport, and supply cocaine to **MICHAEL P. FELICELLO, LAWRENCE A. FALCETTA, JR.,** and **ERNESTO R. RODRIGUEZ, JR. A/K/A ERNESTO REYES RODRIGUEZ,** and to collect the proceeds from selling cocaine from **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**

It was the role of **MICHAEL P. FELICELLO** to possess, transport, and supply cocaine to **LAWRENCE A. FALCETTA, JR.** and to Individual 1 who is known to the Grand Jury, and to collect the proceeds from selling cocaine to Individual 1 who is known to the Grand Jury. Additionally, it was the role of

MICHAEL P. FELICELLO to obtain cocaine from **LAWRENCE A. FALCETTA, JR.** and **JORGE LEE A/K/A “JUNIOR”** for redistribution to other individuals.

It was the role of **LAWRENCE A. FALCETTA, JR.** to possess, prepare, and supply cocaine to **MICHAEL P. FELICELLO**, and to collect the proceeds from selling cocaine from **MICHAEL P. FELICELLO**.

It was the role of **ERNESTO R. RODRIGUEZ, JR. A/K/A ERNESTO REYES RODRIGUEZ** to possess and sell cocaine to Individual 2 who is known to the Grand Jury.

It was the role of **JOSE A. GARCIA** to possess, prepare, transport, and supply cocaine to **MICHAEL BROWN** and **MICHAEL P. FELICELLO**, and to collect the proceeds from selling cocaine from **MICHAEL BROWN**.

It was the role of **MICHAEL BROWN** to possess, transport, and supply cocaine to **MICHAEL P. FELICELLO**, and to collect the proceeds from selling cocaine from **MICHAEL P. FELICELLO**.

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 to schedule cocaine transactions.

OVERT ACTS

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

1. On or about August 7, 2025, in Ulster County, **MICHAEL P. FELICELLO** utilized a red Chevrolet Silverado bearing New York State Registration

XB2282 to obtain a quantity of cocaine from **LAWRENCE A. FALCETTA, JR.**

2. On or about December 30, 2025, in Ulster County, **LAWRENCE A. FALCETTA, JR.** sold a quantity of cocaine that weighed in excess of two ounces to **MICHAEL P. FELICELLO**.
3. On or about December 30, 2025, in Ulster County, **MICHAEL P. FELICELLO**, sold a quantity of cocaine to Individual 1 who is known to the Grand Jury.
4. On or about January 11, 2026, **JOSE A. GARCIA** utilized a cellular telephone to speak with and arrange a cocaine sale to **MICHAEL BROWN** at Whoo's Bar & Grill, in Orange County.
5. On or about January 11, 2026, **MICHAEL BROWN** utilized a cellular telephone to speak with and arrange a cocaine sale to **MICHAEL P. FELICELLO** at Whoo's Bar & Grill, in Orange County.
6. On or about February 23, 2026, in Ulster County, **JORGE LEE A/K/A "JUNIOR"** sold a quantity of cocaine to **LAWRENCE A. FALCETTA, JR.**
7. On or about March 15, 2026, in Orange County, **JOSE A. GARCIA** utilized a maroon Toyota Rav4, bearing New York State Registration KPN6689, to store and transport one-half ounce of cocaine in an attempt to sell said cocaine to **MICHAEL BROWN**.

8. On or about March 15, 2026, in Orange County, **JOSE A. GARCIA** utilized a white Ford F150, bearing New York State Registration KSZ1585, to store, transport, and sell one-half ounce of cocaine to **MICHAEL BROWN**.
9. On or about March 20, 2026, in Orange County, **JORGE LEE A/K/A “JUNIOR”** utilized a gray GMC Sierra, bearing New York State Registration LRN6262, to sell a quantity of cocaine to **MICHAEL P. FELICELLO**.
10. On or about March 20, 2026, **MICHAEL P. FELICELLO** used a cellular telephone to call and inform **LAWRENCE A. FALCETTA, JR.** that **JORGE LEE A/K/A “JUNIOR”**, supplied **MICHAEL P. FELICELLO** with cocaine for redistribution to **LAWRENCE A. FALCETTA, JR.**
11. On or about August 7, 2026, in Ulster County, **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, on behalf of **JORGE LEE A/K/A “JUNIOR”** sold a quantity of cocaine to Individual 2 who is known to the Grand Jury.
12. On or about August 11, 2026, in Ulster County, **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, on behalf of **JORGE LEE A/K/A “JUNIOR”**, sold a quantity of cocaine to Individual 2 who is known to the Grand Jury.

COUNT 2

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE**

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

Said defendants, acting in concert with each other, on or about August 7, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 3

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.** of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 7, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 4

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.** 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 defendants, acting in concert with each other, on or about August 7, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and

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

COUNT 5

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO** 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 August 18, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 6

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO** 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 August 18, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 7

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO** of the crime of **CRIMINAL POSSESSION**

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

Said defendant, on or about August 18, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 8

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 August 18, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 9

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 September 4, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations,

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

COUNT 10

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

Said defendant, on or about September 4, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 11

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

Said defendant, on or about September 4, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 12

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

Said defendant, on or about September 4, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 13

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 September 18, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 14

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

Said defendant, on or about September 18, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 15

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

Said defendant, on or about September 18, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 16

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

Said defendant, on or about September 18, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 17

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 October 9, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 18

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 October 9, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 19

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 October 9, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 20

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 October 9, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 21

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 November 4, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 22

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 November 4, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 23

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 November 4, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 24

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 November 4, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 25

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 15, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 26

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 15, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 27

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 15, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 28

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 15, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 29

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 30

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 31

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 32

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 33

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 34

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 35

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE**

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

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 36

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 37

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 38

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 39

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 January 2, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances

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

COUNT 40

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

Said defendant, on or about January 2, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 41

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 2, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 42

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about January 2, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 43

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 January 4, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 44

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

Said defendant, on or about January 4, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 45

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 4, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 46

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 4, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 47

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 January 23, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 48

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

Said defendant, on or about January 23, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 49

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 23, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 50

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 23, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 51

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 February 25, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations,

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

COUNT 52

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 February 25, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 53

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 25, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 54

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about February 25, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 55

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”**, 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 February 27, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 56

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”**, **MICHAEL P. FELICELLO**, and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 27, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 57

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”, MICHAEL P. FELICELLO, and LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 27, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 58

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 March 1, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances

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

COUNT 59

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 March 1, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 60

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 1, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 61

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about March 1, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 62

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 March 18, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 63

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 March 18, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 64

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 18, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 65

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 18, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 66

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE A/K/A “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 67

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 68

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE A/K/A “JUNIOR”** and **MICHAEL P. FELICELLO**, of

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

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 69

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE A/K/A “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 70

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about March 20, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 71

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 72

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 11, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 73

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 11, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 74

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 11, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 75

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 11, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 76

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

Said defendant, on or about January 26, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 77

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

Said defendant, on or about January 26, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 78

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL BROWN**, 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 February 20, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 79

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL BROWN**, 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 February 20, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 80

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 20, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 81

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 20, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 82

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 24, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 83

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 24, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 84

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 24, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 85

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 24, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 86

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **ATTEMPTED CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 110.00/220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully attempt to sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 87

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JOSE A. GARCIA**, 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 March 15, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 88

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND**

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

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 89

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 90

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 91

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 92

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA and MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations,

compounds, mixtures or substances containing a narcotic drug, to wit: cocaine sale #1, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 93

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine sale #1.

COUNT 94

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine sale #1, with intent to sell it.

COUNT 95

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine sale #1, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 96

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA and MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine sale #2, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 97

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine sale #2.

COUNT 98

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine sale #2, with intent to sell it.

COUNT 99

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED**

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

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine sale #2, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 100

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JOSE A. GARCIA**, 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 April 22, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 101

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 April 20, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 102

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 April 20, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 103

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 21, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 104

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 April 21, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 105

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 April 21, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

COUNT 106

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 April 21, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 107

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 April 21, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 108

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 15, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 109

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 15, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 110

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 15, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 111

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 15, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 112

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 27, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances

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

COUNT 113

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 May 27, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 114

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 27, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 115

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 May 27, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 116

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 July 1, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 117

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about July 1, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 118

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 July 1, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 119

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about July 16, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 120

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 July 16, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 121

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about July 16, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 122

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 July 16, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 123

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 7, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 124

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL SALE OF A**

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

Said defendants, acting in concert with each other, on or about August 7, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 125

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 7, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 126

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 7, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 127

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 11, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 128

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 11, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 129

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 11, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 130

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 11, 2026, in Ulster County, did knowingly and unlawfully possess one or more

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

COUNT 131

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 2, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 132

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 September 2, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations,

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

COUNT 133

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.18(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 2, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

COUNT 134

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 2, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 135

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 2, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 136

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSHUA A. MINTZ, ERIC S. OREMUS, JOHN J. DANGELO, II, and DEBORAH A. FOSTER** of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Section 105.10, Subdivision (1) of the Penal Law of the State of New York, committed as follows:

On or about and between December 8, 2025, and February 5, 2026, in Ulster County and Orange County, in the State of New York, with intent that conduct constituting the crimes of Criminal Sale of a Controlled Substance in the Third Degree, in violation of Section 220.39(1) of the Penal Law of New York, and Criminal Possession of a Controlled Substance in the Third Degree in violation of Section

220.16(1) of the Penal Law of New York, said crimes being Class B Felonies, be committed, the defendants did knowingly and intentionally agree with each other, and other individuals known to the Grand Jury, to engage in and cause the performance of such conduct as would constitute the above-mentioned Class B Felonies.

PREAMBLE

It was the purpose of this conspiracy to acquire, possess, and sell cocaine, in Ulster County, and elsewhere inside the State of New York.

It was the role of **MICHAEL P. FELICELLO** to possess, prepare, transport, and sell cocaine to and to collect the proceeds from selling cocaine to **JOSHUA A. MINTZ, ERIC S. OREMUS, JOHN J. DANGELO, II, and DEBORAH A. FOSTER.**

It was the role of **JOSHUA A. MINTZ, ERIC S. OREMUS, JOHN J. DANGELO, II, and DEBORAH A. FOSTER** to source and redistribute cocaine obtained from **MICHAEL P. FELICELLO** 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 to schedule cocaine transactions.

OVERT ACTS

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

1. On or about December 14, 2025, in Orange County, **ERIC S. OREMUS** utilized a red Mazda3, bearing New York State Registration JFD2613, to purchase, store, and transport a quantity of cocaine from **MICHAEL P. FELICELLO**.
2. On or about December 29, 2025, **JOSHUA A. MINTZ** utilized a cellular telephone to call **MICHAEL P. FELICELLO** and attempt to arrange a cocaine transaction, saying “I didn’t know if you had any of your, uh, that, that—your stuff, the white stuff.”
3. On or about January 11, 2026, **DEBORAH A. FOSTER** utilized a cellular telephone to exchange SMS text messages with, and to arrange a cocaine purchase from, **MICHAEL P. FELICELLO**.
4. On or about January 11, 2026, in Ulster County, **DEBORAH A. FOSTER** traveled to **MICHAEL P. FELICELLO’S** residence to purchase cocaine from **MICHAEL P. FELICELLO**.
5. On or about January 23, 2026, **ERIC S. OREMUS** utilized a cellular telephone to speak with, and arrange a cocaine purchase from, **MICHAEL P. FELICELLO**.
6. On or about January 23, 2026, **ERIC S. OREMUS** utilized a red Mazda3, bearing New York State Registration JFD2613, to store and transport a quantity of cocaine from Orange County to Ulster County.

7. On or about January 29, 2026, **JOHN J. DANGELO, II** utilized a cellular telephone to speak with, and arrange a cocaine purchase from, **MICHAEL P. FELICELLO**.
8. On or about January 29, 2026, in Orange County, **JOHN J. DANGELO, II** utilized a white BMW X1, bearing New York State Registration LJZ5935, to store and transport a quantity of cocaine.
9. On or about January 30, 2026, **JOSHUA A. MINTZ** utilized a cellular telephone to speak with, and arrange a cocaine purchase from, **MICHAEL P. FELICELLO**.
10. On or about February 1, 2026, in Orange County, **JOSHUA A. MINTZ** entered RMC Trucking Inc. property to retrieve cocaine from **MICHAEL P. FELICELLO**.
11. On or about February 3, 2026, **JOSHUA A. MINTZ** utilized a cellular telephone to arrange a cocaine purchase from **MICHAEL P. FELICELLO** via a series of SMS text messages and phone calls.

COUNT 137

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

Said defendant, on or about January 30, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 138

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **JOSHUA A. MINTZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 30, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 139

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **JOSHUA A. MINTZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 30, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 140

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 February 1, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 141

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **JOSHUA A. MINTZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 1, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 142

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 February 3, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 143

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **JOSHUA A. MINTZ**, 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 defendants, acting in concert with each other, on or about February 3, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

COUNT 144

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **ERIC S. OREMUS**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 23, 2026, in Orange County and Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 145

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **ERIC S. OREMUS**, 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 defendants, acting in concert with each other, on or about January 23, 2026, in Orange County and Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

COUNT 146

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

Said defendant, on or about January 29, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 147

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL POSSESSION**

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

Said defendant, on or about January 29, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 148

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

Said defendant, on or about January 8, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 149

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **DEBORAH A. FOSTER**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 8, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 150

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

Said defendant, on or about January 10, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 151

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **DEBORAH A. FOSTER**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 10, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 152

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

Said defendant, on or about January 14, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 153

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **DEBORAH A. FOSTER**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 14, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

Dated: September __, 2026
Ulster County, New York

NICOLE KEARY
Deputy Attorney General
Organized Crime Task Force

By: _____
SCOTT R. JOHNSON, ESQ.
Assistant Deputy Attorney General
Organized Crime Task Force

A TRUE BILL

GRAND JURY FOREPERSON
Dated: September __, 2026

STATE OF NEW YORK : COUNTY OF ULSTER
COUNTY COURT

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

-against-

ULSTER COUNTY
INDICTMENT
NUMBER
_____/2026

- X. JORGE LEE A/K/A “JUNIOR”;
- X. MICHAEL P. FELICELLO;
- X. LAWRENCE A. FALCETTA, JR.;
- X. ERNESTO R. RODRIGUEZ, JR. A/K/A ERNESTO REYES RODRIGUEZ;
- X. JOSE A. GARCIA;
- X. MICHAEL BROWN;
- X. JOSHUA A. MINTZ;
- X. ERIC S. OREMUS;
- X. JOHN J. DANGELO, II; and
- X. DEBORAH A. FOSTER;

DEFENDANTS.

-----X

COUNT 1

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE A/K/A “JUNIOR”, MICHAEL P. FELICELLO, LAWRENCE A. FALCETTA, JR., ERNESTO R. RODRIGUEZ, JR. A/K/A ERNESTO REYES RODRIGUEZ, JOSE A. GARCIA, and MICHAEL BROWN** of the crime of **CONSPIRACY IN THE SECOND DEGREE**, in violation of Section 105.15 of the Penal Law of the State of New York, committed as follows:

On or about and between August 7, 2025 and September 2, 2026, in Ulster County and Orange County, in the State of New York, with intent that conduct constituting the crimes of Criminal Sale of a Controlled Substance in the First

Degree, in violation of Section 220.43(1) of the Penal Law of New York, Criminal Sale of a Controlled Substance in the Second Degree, in violation of Section 220.41(1) of the Penal Law of New York, and/or Criminal Possession of a Controlled Substance in the Second Degree in violation of Section 220.18(1) of the Penal Law of New York, said crimes being Class A Felonies, be committed, the defendants did knowingly and intentionally agree with each other, and with other individuals known to the Grand Jury, to engage in and cause the performance of such conduct as would constitute the above-mentioned Class A Felonies.

PREAMBLE

It was the purpose of this conspiracy to acquire, possess, and sell cocaine in quantities of at least one-half ounce or more, in Ulster County and Orange County, in the State of New York.

It was the role of **JORGE LEE A/K/A “JUNIOR”** to possess, prepare, transport, and supply cocaine to **MICHAEL P. FELICELLO, LAWRENCE A. FALCETTA, JR.,** and **ERNESTO R. RODRIGUEZ, JR. A/K/A ERNESTO REYES RODRIGUEZ,** and to collect the proceeds from selling cocaine from **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**

It was the role of **MICHAEL P. FELICELLO** to possess, transport, and supply cocaine to **LAWRENCE A. FALCETTA, JR.** and to Individual 1 who is known to the Grand Jury, and to collect the proceeds from selling cocaine to Individual 1 who is known to the Grand Jury. Additionally, it was the role of

MICHAEL P. FELICELLO to obtain cocaine from **LAWRENCE A. FALCETTA, JR.** and **JORGE LEE A/K/A “JUNIOR”** for redistribution to other individuals.

It was the role of **LAWRENCE A. FALCETTA, JR.** to possess, prepare, and supply cocaine to **MICHAEL P. FELICELLO**, and to collect the proceeds from selling cocaine from **MICHAEL P. FELICELLO**.

It was the role of **ERNESTO R. RODRIGUEZ, JR. A/K/A ERNESTO REYES RODRIGUEZ** to possess and sell cocaine to Individual 2 who is known to the Grand Jury.

It was the role of **JOSE A. GARCIA** to possess, prepare, transport, and supply cocaine to **MICHAEL BROWN** and **MICHAEL P. FELICELLO**, and to collect the proceeds from selling cocaine from **MICHAEL BROWN**.

It was the role of **MICHAEL BROWN** to possess, transport, and supply cocaine to **MICHAEL P. FELICELLO**, and to collect the proceeds from selling cocaine from **MICHAEL P. FELICELLO**.

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 to schedule cocaine transactions.

OVERT ACTS

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

1. On or about August 7, 2025, in Ulster County, **MICHAEL P. FELICELLO** utilized a red Chevrolet Silverado bearing New York State Registration

XB2282 to obtain a quantity of cocaine from **LAWRENCE A. FALCETTA, JR.**

2. On or about December 30, 2025, in Ulster County, **LAWRENCE A. FALCETTA, JR.** sold a quantity of cocaine that weighed in excess of two ounces to **MICHAEL P. FELICELLO**.
3. On or about December 30, 2025, in Ulster County, **MICHAEL P. FELICELLO**, sold a quantity of cocaine to Individual 1 who is known to the Grand Jury.
4. On or about January 11, 2026, **JOSE A. GARCIA** utilized a cellular telephone to speak with and arrange a cocaine sale to **MICHAEL BROWN** at Whoo's Bar & Grill, in Orange County.
5. On or about January 11, 2026, **MICHAEL BROWN** utilized a cellular telephone to speak with and arrange a cocaine sale to **MICHAEL P. FELICELLO** at Whoo's Bar & Grill, in Orange County.
6. On or about February 23, 2026, in Ulster County, **JORGE LEE A/K/A "JUNIOR"** sold a quantity of cocaine to **LAWRENCE A. FALCETTA, JR.**
7. On or about March 15, 2026, in Orange County, **JOSE A. GARCIA** utilized a maroon Toyota Rav4, bearing New York State Registration KPN6689, to store and transport one-half ounce of cocaine in an attempt to sell said cocaine to **MICHAEL BROWN**.

8. On or about March 15, 2026, in Orange County, **JOSE A. GARCIA** utilized a white Ford F150, bearing New York State Registration KSZ1585, to store, transport, and sell one-half ounce of cocaine to **MICHAEL BROWN**.
9. On or about March 20, 2026, in Orange County, **JORGE LEE A/K/A “JUNIOR”** utilized a gray GMC Sierra, bearing New York State Registration LRN6262, to sell a quantity of cocaine to **MICHAEL P. FELICELLO**.
10. On or about March 20, 2026, **MICHAEL P. FELICELLO** used a cellular telephone to call and inform **LAWRENCE A. FALCETTA, JR.** that **JORGE LEE A/K/A “JUNIOR”**, supplied **MICHAEL P. FELICELLO** with cocaine for redistribution to **LAWRENCE A. FALCETTA, JR.**
11. On or about August 7, 2026, in Ulster County, **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, on behalf of **JORGE LEE A/K/A “JUNIOR”** sold a quantity of cocaine to Individual 2 who is known to the Grand Jury.
12. On or about August 11, 2026, in Ulster County, **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, on behalf of **JORGE LEE A/K/A “JUNIOR”**, sold a quantity of cocaine to Individual 2 who is known to the Grand Jury.

COUNT 2

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE**

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

Said defendants, acting in concert with each other, on or about August 7, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 3

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.** of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 7, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 4

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.** 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 defendants, acting in concert with each other, on or about August 7, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and

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

COUNT 5

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO** 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 August 18, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 6

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO** 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 August 18, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 7

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO** of the crime of **CRIMINAL POSSESSION**

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

Said defendant, on or about August 18, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 8

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 August 18, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 9

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 September 4, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations,

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

COUNT 10

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

Said defendant, on or about September 4, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 11

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

Said defendant, on or about September 4, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 12

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

Said defendant, on or about September 4, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 13

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 September 18, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 14

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

Said defendant, on or about September 18, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 15

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

Said defendant, on or about September 18, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 16

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

Said defendant, on or about September 18, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 17

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 October 9, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 18

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 October 9, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 19

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 October 9, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 20

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 October 9, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 21

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 November 4, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 22

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 November 4, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 23

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 November 4, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 24

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 November 4, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 25

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 15, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 26

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 15, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 27

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 15, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 28

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 15, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 29

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 30

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 31

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 32

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 33

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about December 30, 2025, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 34

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 35

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE**

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

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 36

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 37

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 38

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 21, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 39

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 January 2, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances

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

COUNT 40

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

Said defendant, on or about January 2, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 41

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 2, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 42

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about January 2, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 43

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 January 4, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 44

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

Said defendant, on or about January 4, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 45

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 4, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 46

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 4, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 47

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 January 23, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 48

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

Said defendant, on or about January 23, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 49

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 23, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 50

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 23, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 51

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 February 25, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations,

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

COUNT 52

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 February 25, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 53

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 25, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 54

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about February 25, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 55

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”**, 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 February 27, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 56

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”**, **MICHAEL P. FELICELLO**, and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 27, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 57

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”, MICHAEL P. FELICELLO, and LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 27, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 58

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 March 1, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances

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

COUNT 59

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 March 1, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 60

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 1, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 61

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about March 1, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 62

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 March 18, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 63

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 March 18, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 64

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 18, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 65

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 18, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 66

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE A/K/A “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 67

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 68

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE A/K/A “JUNIOR”** and **MICHAEL P. FELICELLO**, of

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

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 69

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE A/K/A “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 70

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN**

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

Said defendants, acting in concert with each other, on or about March 20, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 71

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **LAWRENCE A. FALCETTA, JR.**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 72

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 11, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 73

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 11, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 74

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 11, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 75

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 11, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 76

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

Said defendant, on or about January 26, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 77

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

Said defendant, on or about January 26, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 78

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL BROWN**, 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 February 20, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 79

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL BROWN**, 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 February 20, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 80

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 20, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 81

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 20, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 82

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 24, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 83

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 24, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 84

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 24, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 85

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 24, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 86

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **ATTEMPTED CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 110.00/220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully attempt to sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 87

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JOSE A. GARCIA**, 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 March 15, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 88

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND**

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

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 89

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 90

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 91

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 15, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 92

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA and MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations,

compounds, mixtures or substances containing a narcotic drug, to wit: cocaine sale #1, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 93

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine sale #1.

COUNT 94

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine sale #1, with intent to sell it.

COUNT 95

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSE A. GARCIA, and MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine sale #1, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 96

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA and MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine sale #2, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 97

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JOSE A. GARCIA** and **MICHAEL BROWN**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine sale #2.

COUNT 98

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine sale #2, with intent to sell it.

COUNT 99

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO**, **JOSE A. GARCIA**, and **MICHAEL BROWN**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED**

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

Said defendants, acting in concert with each other, on or about March 20, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine sale #2, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 100

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JOSE A. GARCIA**, 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 April 22, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 101

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 April 20, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 102

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **LAWRENCE A. FALCETTA, JR.**, 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 April 20, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 103

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 21, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 104

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 April 21, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 105

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 April 21, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

COUNT 106

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 April 21, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 107

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 April 21, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 108

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 15, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 109

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 15, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 110

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 15, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 111

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about May 15, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 112

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 27, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances

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

COUNT 113

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 May 27, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 114

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 27, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 115

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 May 27, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 116

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 July 1, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 117

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about July 1, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 118

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 July 1, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 119

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about July 16, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 120

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 July 16, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 121

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about July 16, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 122

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 July 16, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 123

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 7, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 124

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL SALE OF A**

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

Said defendants, acting in concert with each other, on or about August 7, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 125

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 7, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 126

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 7, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 127

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 11, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 128

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 11, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 129

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 11, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 130

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **JORGE LEE a/k/a “JUNIOR”** and **ERNESTO R. RODRIGUEZ, JR. a/k/a ERNESTO REYES RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about August 11, 2026, in Ulster County, did knowingly and unlawfully possess one or more

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

COUNT 131

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 2, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 132

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, 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 September 2, 2026, in Ulster County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations,

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

COUNT 133

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.18(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 2, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

COUNT 134

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 2, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 135

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **JORGE LEE a/k/a “JUNIOR”**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 2, 2026, in Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 136

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO, JOSHUA A. MINTZ, ERIC S. OREMUS, JOHN J. DANGELO, II, and DEBORAH A. FOSTER** of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Section 105.10, Subdivision (1) of the Penal Law of the State of New York, committed as follows:

On or about and between December 8, 2025, and February 5, 2026, in Ulster County and Orange County, in the State of New York, with intent that conduct constituting the crimes of Criminal Sale of a Controlled Substance in the Third Degree, in violation of Section 220.39(1) of the Penal Law of New York, and Criminal Possession of a Controlled Substance in the Third Degree in violation of Section

220.16(1) of the Penal Law of New York, said crimes being Class B Felonies, be committed, the defendants did knowingly and intentionally agree with each other, and other individuals known to the Grand Jury, to engage in and cause the performance of such conduct as would constitute the above-mentioned Class B Felonies.

PREAMBLE

It was the purpose of this conspiracy to acquire, possess, and sell cocaine, in Ulster County, and elsewhere inside the State of New York.

It was the role of **MICHAEL P. FELICELLO** to possess, prepare, transport, and sell cocaine to and to collect the proceeds from selling cocaine to **JOSHUA A. MINTZ, ERIC S. OREMUS, JOHN J. DANGELO, II, and DEBORAH A. FOSTER.**

It was the role of **JOSHUA A. MINTZ, ERIC S. OREMUS, JOHN J. DANGELO, II, and DEBORAH A. FOSTER** to source and redistribute cocaine obtained from **MICHAEL P. FELICELLO** 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 to schedule cocaine transactions.

OVERT ACTS

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

1. On or about December 14, 2025, in Orange County, **ERIC S. OREMUS** utilized a red Mazda3, bearing New York State Registration JFD2613, to purchase, store, and transport a quantity of cocaine from **MICHAEL P. FELICELLO**.
2. On or about December 29, 2025, **JOSHUA A. MINTZ** utilized a cellular telephone to call **MICHAEL P. FELICELLO** and attempt to arrange a cocaine transaction, saying “I didn’t know if you had any of your, uh, that, that—your stuff, the white stuff.”
3. On or about January 11, 2026, **DEBORAH A. FOSTER** utilized a cellular telephone to exchange SMS text messages with, and to arrange a cocaine purchase from, **MICHAEL P. FELICELLO**.
4. On or about January 11, 2026, in Ulster County, **DEBORAH A. FOSTER** traveled to **MICHAEL P. FELICELLO’S** residence to purchase cocaine from **MICHAEL P. FELICELLO**.
5. On or about January 23, 2026, **ERIC S. OREMUS** utilized a cellular telephone to speak with, and arrange a cocaine purchase from, **MICHAEL P. FELICELLO**.
6. On or about January 23, 2026, **ERIC S. OREMUS** utilized a red Mazda3, bearing New York State Registration JFD2613, to store and transport a quantity of cocaine from Orange County to Ulster County.

7. On or about January 29, 2026, **JOHN J. DANGELO, II** utilized a cellular telephone to speak with, and arrange a cocaine purchase from, **MICHAEL P. FELICELLO**.
8. On or about January 29, 2026, in Orange County, **JOHN J. DANGELO, II** utilized a white BMW X1, bearing New York State Registration LJZ5935, to store and transport a quantity of cocaine.
9. On or about January 30, 2026, **JOSHUA A. MINTZ** utilized a cellular telephone to speak with, and arrange a cocaine purchase from, **MICHAEL P. FELICELLO**.
10. On or about February 1, 2026, in Orange County, **JOSHUA A. MINTZ** entered RMC Trucking Inc. property to retrieve cocaine from **MICHAEL P. FELICELLO**.
11. On or about February 3, 2026, **JOSHUA A. MINTZ** utilized a cellular telephone to arrange a cocaine purchase from **MICHAEL P. FELICELLO** via a series of SMS text messages and phone calls.

COUNT 137

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

Said defendant, on or about January 30, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 138

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **JOSHUA A. MINTZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 30, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 139

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **JOSHUA A. MINTZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 30, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 140

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 February 1, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 141

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **JOSHUA A. MINTZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about February 1, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 142

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, 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 February 3, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 143

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **JOSHUA A. MINTZ**, 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 defendants, acting in concert with each other, on or about February 3, 2026, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

COUNT 144

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **ERIC S. OREMUS**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 23, 2026, in Orange County and Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 145

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **ERIC S. OREMUS**, 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 defendants, acting in concert with each other, on or about January 23, 2026, in Orange County and Ulster County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

COUNT 146

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

Said defendant, on or about January 29, 2026, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 147

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendant, **MICHAEL P. FELICELLO**, of the crime of **CRIMINAL POSSESSION**

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

Said defendant, on or about January 29, 2026, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 148

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

Said defendant, on or about January 8, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 149

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **DEBORAH A. FOSTER**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 8, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 150

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

Said defendant, on or about January 10, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 151

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **DEBORAH A. FOSTER**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 10, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 152

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

Said defendant, on or about January 14, 2026, in Ulster County, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 153

THE GRAND JURY OF ULSTER COUNTY, by this Indictment, accuses the defendants, **MICHAEL P. FELICELLO** and **DEBORAH A. FOSTER**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other, on or about January 14, 2026, in Ulster County, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

Dated: September __, 2026
Ulster County, New York

NICOLE KEARY
Deputy Attorney General
Organized Crime Task Force

By: _____
SCOTT R. JOHNSON, ESQ.
Assistant Deputy Attorney General
Organized Crime Task Force

A TRUE BILL

GRAND JURY FOREPERSON
Dated: September __, 2026