

STATE OF NEW YORK
SUPREME/COUNTY COURT : COUNTY OF ERIE

THE PEOPLE OF THE STATE OF NEW YORK,

-v-

SEALED INDICTMENT

No.: _____

OCTF No.: 25-002B

OSCAR ROMERO,
RAYMOND PIZARRO RIVERA,
VICTOR QUINONES,
RICHARD CALDERON CRUZ,
 A/K/A RICHARD CALDERON,
 A/K/A RICHARD CRUZ,
LUIS GALARZA, JR.,
SHIRLEY LOPEZ,
WILFREDO MORALES,
LUIS PUMAREJO,
JESUS OLIVERAS FELICIANO,
 A/K/A JESUS OLIVERAS FELICIAN,
ARAMI MORALES,
ERIK ARIAS,
EDWIN MALDONADO,
HECTOR OQUENDO,
 A/K/A HECTOR ALEJANDRO OQUENDO,
 A/K/A HECTOR ALEJANDROOQUENDO,
ANGEL OQUENDO,
 A/K/A ANGEL ALEJANDRO OQUENDO,
 A/K/A ANGEL ALEJANDROOQUENDO
J.A. CESARI MCDUGALL,
EDWARD PARMER, and
JUSTINO SANTOS,

Defendants.

FIRST COUNT

THE GRAND JURY OF THE COUNTY OF ERIE, by this Indictment, accuses the
defendants, OSCAR ROMERO, RAYMOND PIZARRO RIVERA, VICTOR QUINONES,
RICHARD CALDERON CRUZ A/K/A RICHARD CALDERON A/K/A RICHARD CRUZ

(hereinafter, “RICHARD CALDERON CRUZ”), LUIS GALARZA, JR., SHIRLEY LOPEZ, WILFREDO MORALES, LUIS PUMAREJO, JESUS OLIVERAS FELICIANO A/K/A JESUS OLIVERAS FELICIAN (hereinafter “JESUS OLIVERAS FELICIANO”, ARAMI MORALES, ERIK ARIAS, EDWIN MALDONADO, HECTOR OQUENDO A/K/A HECTOR ALEJANDRO OQUENDO A/K/A HECTOR ALEJANDROOQUENDO (hereinafter “HECTOR OQUENDO”), ANGEL OQUENDO A/K/A ANGEL ALEJANDRO OQUENDO A/K/A ANGEL ALEJANDROOQUENDO” (hereinafter “ANGEL OQUENDO”), J.A. CESARI MCDOUGALL, EDWARD PARMER and JUSTINO SANTOS, 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:

The defendants, in Erie County, Niagara County, Monroe County, Onondaga County and elsewhere in the State of New York, and in the Commonwealth of Puerto Rico, from on or before December 1, 2024, through on or about September 28, 2025, with intent that conduct constituting the crimes of Criminal Possession of a Controlled Substance in the First Degree, Criminal Sale of a Controlled Substance in the First Degree, and/or Criminal Sale of a Controlled Substance in the Second Degree, said crimes being Class A felonies, be committed, did knowingly and intentionally agree with each other and with others, known and unknown, to engage in and cause the performance of such conduct as would constitute any one or more of the above-mentioned class A felonies.

PREAMBLE

It was the purpose of this conspiracy to possess narcotics in amounts of eight ounces or more and/or to sell narcotics in amounts of two ounces or more in Erie County, Niagara County,

Monroe County, Onondaga County and elsewhere in the State of New York and in the Commonwealth of Puerto Rico, .

It was the role of OSCAR ROMERO to supply narcotics to RAYMOND PIZARRO RIVERA, ERIK ARIAS, ARAMI MORALES and others.

It was the role of RAYMOND PIZARRO RIVERA to assist OSCAR ROMERO with the acquisition and distribution of narcotics and to store narcotics and narcotics proceeds with and for OSCAR ROMERO.

It was the role of VICTOR QUINONES to supply narcotics to RICHARD CALDERON CRUZ, LUIS GALARZA, JR., SHIRLEY LOPEZ, WILFREDO MORALES, LUIS PUMAREJO, EDWIN MALDONADO, and others.

It was the role of RICHARD CALDERON CRUZ to procure narcotics from VICTOR QUINONES, LUIS GALARZA, JR., and others, and to supply narcotics to VICTOR QUINONES, LUIS GALARZA, JR., and others.

It was the role of LUIS GALARZA, JR. to procure narcotics from VICTOR QUINONES, RICHARD CALDERON CRUZ, and others, and to supply narcotics to VICTOR QUINONES, RICHARD CALDERON CRUZ, and others.

It was the role of SHIRLEY LOPEZ to assist VICTOR QUINONES with the acquisition and distribution of narcotics and to store narcotics and narcotics proceeds with and for VICTOR QUINONES.

It was the role of WILFREDO MORALES to procure narcotics from unknown sources in Puerto Rico via the U.S. Postal Service and to facilitate narcotics transactions between OSCAR ROMERO, VICTOR QUINONES, ARAMI MORALES and others.

It was the role of LUIS PUMAREJO to procure narcotics from VICTOR QUINONES and RICHARD CALDERON CRUZ for distribution to others.

It was the role of JESUS OLIVERAS FELICIANO to procure narcotics from VICTOR QUINONES, RICHARD CALDERON CRUZ, LUIS GALARZA, JR. and others, and to supply narcotics to VICTOR QUINONES, RICHARD CALDERON CRUZ, LUIS GALARZA, JR. and others.

It was the role of ARAMI MORALES to procure narcotics from OSCAR ROMERO and VICTOR QUINONES to sell to others.

It was the role of ERIK ARIAS to procure narcotics from OSCAR ROMERO to sell to others.

It was the role of EDWIN MALDONADO to procure narcotics from VICTOR QUINONES and SHIRLEY LOPEZ to sell to others.

It was the role of HECTOR OQUENDO to procure narcotics from ANGEL OQUENDO to sell to JUSTINO SANTOS, J.A. CESARI MCDOUGALL and others.

It was the role of ANGEL OQUENDO to ship narcotics from Puerto Rico to HECTOR OQUENDO for distribution to others.

It was the role of J.A. CESARI MCDOUGALL to procure narcotics from HECTOR OQUENDO to sell to others.

It was the role of EDWARD PARMER to sell narcotics to others.

It was the role of JUSTINO SANTOS to assist HECTOR OQUENDO with the distribution of narcotics to others.

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

OVERT ACTS

In furtherance of the conspiracy and to affect the objects thereof, from on or about and between December 1, 2024, until on or about September 28, 2025, the following overt acts, among others, were committed:

1. On or about February 27, 2025, in a series of coded, guarded and/or cryptic telephone conversations, HECTOR OQUENDO agreed to sell cocaine to David Ortiz-Ramos.
2. On or about March 2, 2025, in a series of coded, guarded and/or cryptic telephone conversations, HECTOR OQUENDO agreed to sell cocaine to David Ortiz-Ramos.
3. On or about March 2, 2025, in a series of coded, guarded and/or cryptic telephone conversations, JUSTINO SANTOS agreed to give HECTOR OQUENDO a ride so he could deliver cocaine to David Ortiz-Ramos.
4. On or about March 2, 2025, in a series of coded, guarded and/or cryptic telephone communications with David Ortiz-Ramos, EDWARD PARMER negotiated the price for a kilogram of cocaine and then ordered “half”, referring to one-half kilogram of cocaine, as he only had sufficient funds to pay for that quantity.
5. On or about March 2, 2025, EDWARD PARMER met with David Ortiz-Ramos to purchase cocaine.
6. On or about March 7, 2025, in a series of coded, guarded and/or cryptic telephone conversations with David Ortiz-Ramos, JUSTINO SANTOS ordered “20 hard 20 food”, meaning

\$20 worth of crack cocaine and \$20 worth of heroin and/or fentanyl, and then texted “here” when he had arrived at the transaction site.

7. On or about March 18, 2025, ANGEL OQUENDO flew from Puerto Rico to Buffalo, New York, to pick up money that HECTOR OQUENDO had acquired from the sale of cocaine.

8. On or about March 21, 2025, in a coded, guarded and/or cryptic telephone conversation, ANGEL OQUENDO informed HECTOR OQUENDO that a package containing cocaine had been shipped to HECTOR OQUENDO and should arrive “tomorrow”, and ANGEL OQUENDO added that he expected HECTOR OQUENDO to sell the cocaine “quickly”.

9. On or about March 22, 2025, in a coded, guarded and/or cryptic telephone conversation, HECTOR OQUENDO offered to sell cocaine to J.A. CESARI MCDOUGALL, but J.A. CESARI MCDOUGALL indicated that he “still had 8 left”, referring to quantities of narcotics that he had yet to sell, and told HECTOR OQUENDO to sell the cocaine to another customer.

10. On or about March 28, 2025, in a coded, guarded and/or cryptic telephone conversation, OSCAR ROMERO informed VICTOR QUINONES that he had cocaine to sell by saying, “Snow White came and I will take care of you”, and VICTOR QUINONES responded, “Okay, I need it. I need it.”

11. On or about April 13, 2025, in a coded, guarded and/or cryptic telephone conversation, OSCAR ROMERO asked ARAMI MORALES to rate the quality of some narcotics he had supplied to him on a scale “from one to ten”, and ARAMI MORALES responded that it is “probably like an eight, but that’s good. Like a high eight for sure.”

12. On April 14, 2025, in a coded, guarded and/or cryptic telephone conversation, OSCAR ROMERO asked ARAMI MORALES about the quality of the narcotics he had sold him,

and expressed that there were three types of customers, including “ones of mouth, arm and nose”, referring to the various ways in which cocaine can be ingested. In response, ARAMI MORALES confirmed that he has all three types of customers and that they had all reported that that product was good.

13. On or about April 15, 2025, in a series of coded, guarded and/or cryptic telephone conversations J.A. CESARI MCDOUGALL arranged to sell narcotics to one of his customers in the back parking lot of J.A. CESARI MCDOUGALL’s residence in the City of Buffalo.

14. On or about April 15, 2025, J.A. CESARI MCDOUGALL met HECTOR OQUENDO for a narcotics transaction in the back parking lot of J.A. CESARI MCDOUGALL’s residence in the City of Buffalo.

15. On or about April 18, 2025, in a series of coded, guarded and/or cryptic telephone conversations, OSCAR ROMERO instructed RAYMOND PIZARRO RIVERA to prepare a certain quantity of cocaine for delivery to a customer, and then told RAYMOND PIZARRO RIVERA to “bring it all”.

16. On or about April 18, 2025, RAYMOND PIZARRO RIVERA and OSCAR ROMERO traveled to David Ortiz-Ramos’s residence to supply David Ortiz-Ramos with cocaine.

17. On or about April 24, 2025, in a coded, guarded and/or cryptic telephone conversation, ERIK ARIAS informed OSCAR ROMERO that he had sold “almost half” of the narcotics he had procured from OSCAR ROMERO, but his sales had been “slow.” OSCAR ROMERO acknowledged “there is a lot around”, meaning there was a surplus of cocaine in the Buffalo region.

18. On or about April 25, 2025, in a coded, guarded and/or cryptic telephone conversation, ARAMI MORALES informed OSCAR ROMERO that he only received “23”,

meaning 23 grams of cocaine. OSCAR ROMERO initially responded, “I gave you 28”, meaning 28 grams of cocaine, but then acknowledged “it was short then”.

19. On or about April 29, 2025, in a series of coded, guarded and/or cryptic telephone conversations, J.A. CESARI MCDOUGALL agreed to sell “two” quantities of cocaine to one of his customers.

20. On or about May 4, 2025, in a series of coded, guarded and/or cryptic telephone conversations with OSCAR ROMERO, RAYMOND PIZARRO RIVERA agreed to deliver narcotics to a customer, and then informed OSCAR ROMERO that he had delivered the narcotics stating, “I’m with the man.”

21. On or about May 13, 2025, WILFREDO MORALES received a package via the United States Postal Service.

22. On or about May 19, 2025, in a coded, guarded and/or cryptic telephone conversation, VICTOR QUINONES and RICHARD CALDERON CRUZ discussed various quantities of cocaine, which they referred to as a “big boy” and a “big baby”, as well as “four and a half”.

23. On or about May 21, 2025, in a coded, guarded and/or cryptic telephone conversation, ARAMI MORALES told VICTOR QUINONES that he wanted “twenty-eight of regular”, meaning 28 grams of cocaine and VICTOR QUINONES confirmed that ARAMI MORALES wanted “a full one”, meaning one ounce of cocaine. ARAMI MORALES then stated that he was “in Rochester” but was going to travel to Buffalo to meet VICTOR QUINONES for the transaction “tomorrow”.

24. On or about May 22, 2025, ARAMI MORALES, WILFREDO MORALES and VICTOR QUINONES met to conduct a narcotics transaction in the City of Buffalo. ARAMI MORALES then returned to Rochester, NY (Monroe County) with the narcotics.

25. On or about and between June 1, 2025, and June 2, 2025, in series of coded, guarded and/or cryptic telephone conversations, OSCAR ROMERO and RAYMOND PIZARRO RIVERA made plans to pick up a parcel containing cocaine that was being shipped via the U.S. Postal Service.

26. On or about June 2, 2025, RAYMOND PIZARRO RIVERA was in possession of more than eight ounces of cocaine when the motorcycle on which he was traveling was stopped by law enforcement.

27. On or about June 11, 2025, LUIS GALARZA JR., VICTOR QUINONES, and RICHARD CALDERON CRUZ met at RICHARD CALDERON CRUZ's barbershop in Cheektowaga, New York, in furtherance of their narcotics trafficking activities.

28. On or about June 13, 2025, in a coded, guarded and/or cryptic telephone conversation with an unknown narcotics source, ERIK ARIAS ordered a new supply of cocaine, stating, "I need five when you can".

29. On or about June 16, 2025, in a coded, guarded and/or cryptic telephone conversation, SHIRLEY LOPEZ informed VICTOR QUINONES that a narcotics customer had claimed she had already paid VICTOR QUINONES for a narcotics supply, and VICTOR QUINONES confirmed the customer had paid him \$95. VICTOR QUINONES then instructed SHIRLEY LOPEZ to deliver the narcotics to the customer.

30. On or about June 17, 2025, in a coded, guarded and/or cryptic telephone conversation with OSCAR ROMERO, ERIK ARIAS discussed his narcotic sales, stating, “It’s going fast. I already sold five.”

31. On or about June 18, 2025, in a series of coded, guarded and/or cryptic telephone conversations, VICTOR QUINONES directed SHIRLEY LOPEZ to bring him “one and one” of “hard and soft”, meaning one quantity of powder cocaine and one quantity of crack cocaine. VICTOR QUINONES later directed SHIRLEY LOPEZ to “take the small one out and put it on a scale”, and SHIRLEY LOPEZ reported that the substance weighed “four point four”.

32. On or about June 18, 2025, in a coded, guarded and/or cryptic telephone conversation with David Ortiz-Ramos, EDWIN MALDONADO offered to sell a quantity of cocaine “for eight”, meaning \$800, and assured David Ortiz-Ramos that the cocaine was “right from the plant”, meaning it was unadulterated.

33. On or about June 19, 2025, in a series of coded, guarded and/or cryptic telephone conversations, VICTOR QUINONES told JESUS OLIVERAS FELICIANO he wanted “one unit”, referring to a quantity of narcotics, and JESUS OLIVERAS FELICIANO replied, “I have that.”

34. On or about June 30, 2025, in a coded, guarded and/or cryptic telephone conversation, SHIRLEY LOPEZ asked VICTOR QUINONES to “make two or three” quantities of crack cocaine, because she was expecting a customer to call her.

35. On or about July 3, 2025, in a series of coded, guarded and/or cryptic telephone communications, LUIS GALARZA JR. offered to sell an unknown customer “500 for 5 eight ball”, meaning five one-eighth quantities of narcotics for \$500.

36. On or about July 7, 2025, in a series of coded, guarded and/or cryptic telephone conversations, LUIS PUMAREJO asked RICHARD CALDERON CRUZ to bring him “a little one ... the soft”, meaning a quantity of powder cocaine, “and the other, the hard one”, meaning a quantity of crack cocaine, and RICHARD CALDERON CRUZ subsequently informed LUIS PUMAREJO that he was on his way to deliver the narcotics.

37. On or about July 8, 2025, in a coded, guarded and/or cryptic telephone conversation, VICTOR QUINONES directed EDWIN MALDONADO to not bring certain customers to conduct narcotics transactions with VICTOR QUINONES anymore, because “they want the things up front, but it has to be whenever they want it”, and EDWIN MALDONADO agreed.

38. On or about July 9, 2025, in a coded, guarded and/or cryptic telephone conversation, JESUS OLIVERAS FELICIANO arranged to meet VICTOR QUINONES for a narcotics transaction.

39. On or about July 9, 2025, in a series of coded, guarded and/or cryptic telephone communications, LUIS GALARZA JR. agreed to supply an unknown customer with an ounce of cocaine, which the customer referred to as “a whole”. LUIS GALARZA JR. subsequently confirmed that the customer meant an ounce, by texting “O” to the customer, and the customer replied, “yessir”.

40. On or about August 3, 2025, in a coded, guarded and/or cryptic telephone conversation, LUIS PUMAREJO asked an unknown male customer, “How many do you want?”, and the unknown male responded that he wanted “one” quantity of a controlled substance. LUIS PUMAREJO told him to “come down” to conduct the narcotics transaction.

41. On or about August 20, 2025, RICHARD CALDERON CRUZ sold cocaine to a person known to the Grand Jury.

SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, HECTOR OQUENDO, 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, in that he, the said HECTOR OQUENDO, on or about the 27th day of February 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, HECTOR OQUENDO and JUSTINO SANTOS, 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, in that they, the said HECTOR OQUENDO and JUSTINO SANTOS, acting in concert, on or about the 2nd day of March 2025, in Erie County, knowingly and unlawfully sold 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.

FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant EDWARD PARMER, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1)

of the Penal Law of the State of New York, in that he, the said EDWARD PARMER, on or about the 2nd day of March 2025, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant EDWARD PARMER, 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, in that he, the said EDWARD PARMER, on or about the 2nd day of March 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant JUSTINO SANTOS, 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, in that he, the said JUSTINO SANTOS, on or about the 7th day of March 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine and/or fentanyl, with the intent to sell it.

SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, OSCAR ROMERO, 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, in that he, the said OSCAR ROMERO, on or about the 15th day of March 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, HECTOR OQUENDO and ANGEL OQUENDO, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that they, the said HECTOR OQUENDO and ANGEL OQUENDO, acting in concert, on or about and between the 19th day of March 2025, and the 22nd day of March 2025, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, HECTOR OQUENDO and ANGEL OQUENDO, 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, in that they, the said HECTOR OQUENDO and ANGEL OQUENDO, acting in concert, on or about and between the 19th day of March 2025 and 22nd day of March 2025, in Erie County, knowingly and unlawfully sold 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.

TENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants OSCAR ROMERO and RAYMOND PIZARRO RIVERA 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, in that they, the said OSCAR ROMERO and RAYMOND PIZARRO RIVERA, acting in concert, on or about the 29th day of March 2025, (transaction #1) in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

ELEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants OSCAR ROMERO and RAYMOND PIZARRO RIVERA 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, in that they, the said OSCAR ROMERO and RAYMOND PIZARRO RIVERA, acting in concert, on or about the 29th day of March 2025, (transaction #2) in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

TWELFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, OSCAR ROMERO, 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, in that he, the said OSCAR ROMERO, on or about the 2nd day of April 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

THIRTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, OSCAR ROMERO and RAYMOND PIZARRO RIVERA, 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, in that they, the said OSCAR ROMERO and RAYMOND PIZARRO RIVERA, acting in concert, on or about the 11th day of April 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

FOURTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, OSCAR ROMERO and RAYMOND PIZARRO RIVERA, 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, in that they, the said OSCAR ROMERO and RAYMOND PIZARRO RIVERA, acting in concert, on or about the 11th day of April 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

FIFTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, OSCAR ROMERO and RAYMOND PIZARRO RIVERA, 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, in that they, the said OSCAR ROMERO and RAYMOND PIZARRO RIVERA, acting in concert, on or about the 11th day of April 2025, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and

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

SIXTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, J.A. CESARI MCDOUGALL, 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, in that he, the said J.A. CESARI MCDOUGALL, on or about the 15th day of April 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

SEVENTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, OSCAR ROMERO and RAYMOND PIZARRO RIVERA, 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, in that they, the said OSCAR ROMERO and RAYMOND PIZARRO RIVERA, acting in concert, on or about the 18th day of April 2025, in Erie County, knowingly and unlawfully sold (sale #1) a narcotic drug, to wit: cocaine.

EIGHTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, OSCAR ROMERO and RAYMOND PIZARRO RIVERA, 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, in that they, the said OSCAR ROMERO and RAYMOND PIZARRO RIVERA, acting in concert, on or about the 18th

day of April 2025, in Erie County, knowingly and unlawfully sold (sale #2) a narcotic drug, to wit: cocaine.

NINETEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, OSCAR ROMERO, 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, in that he, the said OSCAR ROMERO, on or about the 25th day of April 2025, in Erie County, knowingly and unlawfully sold 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.

TWENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant ARAMI MORALES, 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, in that he, the said ARAMI MORALES, on or about the 25th day of April 2025, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

TWENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, OSCAR ROMERO and RAYMOND PIZARRO RIVERA, 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, in that they, the said OSCAR ROMERO and RAYMOND PIZARRO RIVERA, acting in concert, on or about the 29th day of April 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

TWENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, J.A. CESARI MCDOUGALL, 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, in that he, the said J.A. CESARI MCDOUGALL, on or about the 29th day of April 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

TWENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, OSCAR ROMERO and RAYMOND PIZARRO RIVERA, 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, in that they, the said OSCAR ROMERO and RAYMOND PIZARRO RIVERA, acting in concert, on or about the 1st day of May 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

TWENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, OSCAR ROMERO, 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, in that he, the said OSCAR ROMERO, on or about

the 2nd day of May 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

TWENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant ARAMI MORALES, 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, in that he, the said ARAMI MORALES, on or about the 2nd day of May 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with the intent to sell it.

TWENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, OSCAR ROMERO and RAYMOND PIZARRO RIVERA, 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, in that they, the said OSCAR ROMERO and RAYMOND PIZARRO RIVERA, acting in concert, on or about the 4th day of May 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

TWENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 10th day of May 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

TWENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 10th day of May 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

TWENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, OSCAR ROMERO and WILFREDO MORALES, 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, in that they, the said OSCAR ROMERO and WILFREDO MORALES, acting in concert, on or about the 13th day of May 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

THIRTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 12th day of May 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

THIRTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 14th day of May 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

THIRTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, J.A. CESARI MCDOUGALL, 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, in that he, the said J.A. CESARI MCDOUGALL, on or about the 15th day of May 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

THIRTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 17th day of May 2025, in Erie County, knowingly and unlawfully sold (sale #1) a narcotic drug, to wit: cocaine.

THIRTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 17th day of May 2025, in Erie County, knowingly and unlawfully sold (sale #2) a narcotic drug, to wit: cocaine.

THIRTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, J.A. CESARI MCDOUGALL, 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, in that he, the said J.A. CESARI MCDOUGALL, on or about the 20th day of May 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

THIRTY-SIXTH COUNT

Old38 AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, OSCAR ROMERO, 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, in that he, the said OSCAR ROMERO, on or about the 21st day of May 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

THIRTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant ERIK ARIAS, 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, in that he, the said ERIK ARIAS, on or about the 21st

day of May 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

THIRTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 21st day of May 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

THIRTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and WILFREDO MORALES, 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, in that they, the said VICTOR QUINONES and WILFREDO MORALES, acting in concert, on or about and between the 21st day of May 2025, and the 22nd day of May 2025, in Erie County, knowingly and unlawfully sold 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.

FORTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant ARAMI MORALES, 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, in that he, the said ARAMI MORALES, on or about the 22nd day of May 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

FORTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant ARAMI MORALES, 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, in that he, the said ARAMI MORALES, on or about the 22nd day of May 2025, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

FORTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 22nd day of May 2025, in Erie County, knowingly and unlawfully sold (sale #1) a narcotic drug, to wit: cocaine.

FORTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 22nd day of May 2025, in Erie County, knowingly and unlawfully sold (sale #2) a narcotic drug, to wit: cocaine.

FORTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant ERIK ARIAS, 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, in that he, the said ERIK ARIAS, on or about the 23rd day of May 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug with the intent to sell it.

FORTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 27th day of May 2025, in Erie County, knowingly and unlawfully sold (sale #1) a narcotic drug, to wit: cocaine.

FORTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about

the 27th day of May 2025, in Erie County, knowingly and unlawfully sold (sale #2) a narcotic drug,
to wit: cocaine.

FORTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 28th day of May 2025, in Erie County, knowingly and unlawfully sold (sale #1) a narcotic drug,
to wit: cocaine.

FORTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 28th day of May 2025, in Erie County, knowingly and unlawfully sold (sale #2) a narcotic drug,
to wit: cocaine.

FORTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant RICHARD CALDERON CRUZ, 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, in that he, the said RICHARD CALDERON CRUZ, on or about the 28th day of May 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

FIFTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant RICHARD CALDERON CRUZ, 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, in that he, the said RICHARD CALDERON CRUZ, on or about the 28th day of May 2025, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

FIFTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 28th day of May 2025, in Erie County, knowingly and unlawfully sold (sale #3) a narcotic drug, to wit: cocaine.

FIFTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 29th day of May 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

FIFTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, J.A. CESARI MCDOUGALL, 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, in that he, the said J.A. CESARI MCDOUGALL, on or about the 30th day of May 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

FIFTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant J.A. CESARI MCDOUGALL, 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, in that he, the said J.A. CESARI MCDOUGALL, on or about the 30th day of May 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

FIFTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, OSCAR ROMERO and RAYMOND PIZARRO RIVERA, 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, in that they, the said OSCAR ROMERO and RAYMOND PIZARRO RIVERA, acting in concert, on or about the 30th day of May 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

FIFTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that he, the said VICTOR QUINONES, on or about the 29th day of May 2025, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

FIFTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 31st day of May 2025, in Erie County, knowingly and unlawfully sold (sale #1) a narcotic drug, to wit: cocaine.

FIFTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about

the 31st day of May 2025, in Erie County, knowingly and unlawfully sold (sale #2) a narcotic drug, to wit: cocaine.

FIFTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, RAYMOND PIZARRO RIVERA and OSCAR ROMERO, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that they, the said RAYMOND PIZARRO RIVERA and OSCAR ROMERO, acting in concert, on or about the 2nd day of June 2025, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

SIXTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 2nd day of June 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

SIXTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 3rd day of June 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

SIXTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 3rd day of June 2025, in Erie County, knowingly and unlawfully sold 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.

SIXTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and EDWIN MALDONADO, 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, in that they, the said VICTOR QUINONES and EDWIN MALDONADO, acting in concert, on or about the 13th day of June 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

SIXTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about the 16th day of June 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

SIXTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about and between the 18th day of June 2025, and the 19th day of June 2025, in Erie County, knowingly and unlawfully sold (sale #1) 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.

SIXTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about and between the 18th day of June 2025, and the 19th day of June 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

SIXTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further

accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about and between the 18th day of June 2025, and the 19th day of June 2025, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

SIXTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 19th day of June 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it. (transaction #2)

SIXTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, JESUS OLIVERAS FELICIANO, 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, in that he, the said JESUS OLIVERAS FELICIANO, on or about the 19th day of June 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

SEVENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant JESUS OLIVERAS FELICIANO, 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, in that he, the said JESUS OLIVERAS FELICIANO, on or about the 19th day of June 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

SEVENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about the 19th day of June 2025, in Erie County, knowingly and unlawfully sold (sale #3) a narcotic drug, to wit: cocaine.

SEVENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 19th day of June 2025, in Erie County, knowingly and unlawfully sold (sale #4) a narcotic drug, to wit: cocaine.

SEVENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further

accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about the 21st day of June 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

SEVENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant EDWIN MALDONADO, 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, in that he, the said EDWIN MALDONADO, on or about the 21st day of June 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

SEVENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS PUMAREJO, 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, in that he, the said LUIS PUMAREJO, on or about the 22nd day of June 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

SEVENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about the 23rd day of June 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

SEVENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about the 27th day of June 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

SEVENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant EDWIN MALDONADO, 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, in that he, the said EDWIN MALDONADO, on or about the 27th day of June 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with the intent to sell it.

SEVENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant EDWIN MALDONADO, 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, in that he, the said EDWIN MALDONADO, on or about the 28th day of June 2025, in Erie County, knowingly and unlawfully possessed a narcotic

drug, to wit: fentanyl, with the intent to sell it.

EIGHTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about the 28th day of June 2025, in Erie County, knowingly and unlawfully sold (sale #1) a narcotic drug, to wit: cocaine.

EIGHTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant EDWIN MALDONADO, 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, in that he, the said EDWIN MALDONADO, on or about the 28th day of June 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

EIGHTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about the 28th day of June 2025, in Erie County, knowingly and unlawfully sold (sale #2) a narcotic drug, to wit: cocaine.

EIGHTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about the 29th day of June 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: heroin and/or fentanyl.

EIGHTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, RICHARD CALDERON CRUZ, 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, in that he, the said RICHARD CALDERON CRUZ, on or about and between the 30th day of June 2025, and the 1st day of July 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

EIGHTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said

VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about the 1st day of July 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

EIGHTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS GALARZA, 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, in that he, the said LUIS GALARZA, JR., on or about and between the 3rd day of July 2025, and the 4th day of July 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

EIGHTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about the 3rd day of July 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

EIGHTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, VICTOR QUINONES, 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, in that he, the said VICTOR QUINONES, on or about

the 3rd day of July 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

EIGHTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant ERIK ARIAS, 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, in that he, the said ERIK ARIAS, on or about the 5th day of July 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

NINETIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, RICHARD CALDERON CRUZ, 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, in that he, the said RICHARD CALDERON CRUZ, on or about the 7th day of July 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

NINETY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant LUIS PUMAREJO, 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, in that he, the said LUIS PUMAREJO, on or about the 7th day of July 2025, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and

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

NINETY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, RICHARD CALDERON CRUZ, 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, in that he, the said RICHARD CALDERON CRUZ, on or about the 9th day of July 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

NINETY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about the 9th day of July 2025, in Erie County, knowingly and unlawfully sold (sale #1) a narcotic drug, to wit: cocaine.

NINETY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about the 9th day of July 2025, in Erie County, knowingly and unlawfully sold (sale #2) a narcotic drug, to wit: cocaine.

NINETY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about the 12th day of July 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

NINETY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, VICTOR QUINONES and SHIRLEY LOPEZ, 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, in that they, the said VICTOR QUINONES and SHIRLEY LOPEZ, acting in concert, on or about the 12th day of July 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

NINETY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, JESUS OLIVERAS FELICIANO, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that he, the said JESUS OLIVERAS FELICIANO, on or about the 14th day of July 2025, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of

an aggregate weight of eight ounces or more.

NINETY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, JESUS OLIVERAS FELICIANO, 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, in that he, the said JESUS OLIVERAS FELICIANO, on or about the 14th day of July 2025, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

NINETY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS GALARZA, 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, in that he, the said LUIS GALARZA, JR., on or about the 17th day of July 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDREDTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS GALARZA, 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, in that he, the said LUIS GALARZA, JR., on or about the 20th day of July 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS GALARZA, 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, in that he, the said LUIS GALARZA, JR., on or about the 26th day of July 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS GALARZA, 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, in that he, the said LUIS GALARZA, JR., on or about the 29th day of July 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS PUMAREJO, 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, in that he, the said LUIS PUMAREJO, on or about the 11th day of August 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

ONE HUNDRED FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS PUMAREJO, 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, in that he, the said LUIS PUMAREJO, on or about the 15th day of August 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS PUMAREJO, 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, in that he, the said LUIS PUMAREJO, on or about the 17th day of August 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS PUMAREJO, 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, in that he, the said LUIS PUMAREJO, on or about the 20th day of August 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS PUMAREJO, 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, in that he, the said LUIS PUMAREJO, on or about the

20th day of August 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS PUMAREJO, 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, in that he, the said LUIS PUMAREJO, on or about the 23rd day of August 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

ONE HUNDRED NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS PUMAREJO, 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, in that he, the said LUIS PUMAREJO, on or about the 27th day of August 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED TENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS PUMAREJO, 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, in that he, the said LUIS PUMAREJO, on or about the 27th day of August 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

ONE HUNDRED ELEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, LUIS PUMAREJO, 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, in that he, the said LUIS PUMAREJO, on or about the 28th day of August 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

ONE HUNDRED TWELFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, RICHARD CALDERON CRUZ, 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, in that he, the said RICHARD CALDERON CRUZ, on or about the 28th day of July 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED THIRTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, RICHARD CALDERON CRUZ, 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, in that he, the said RICHARD CALDERON CRUZ, on or about the 6th day of August 2025, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED FOURTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further

accuses the defendant, RICHARD CALDERON CRUZ, 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, in that he, the said RICHARD CALDERON CRUZ, on or about the 20th day of August 2025, in Erie County, knowingly and unlawfully sold 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.

ONE HUNDRED FIFTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, LUIS GALARZA, JR. and VICTOR QUINONES, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that they, the said LUIS GALARZA, JR. and VICTOR QUINONES, acting in concert, on or about and between the 15th day of April, 2025 and the 15th day of May, 2025 in Erie County and elsewhere, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

ONE HUNDRED SIXTEENTH

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, LUIS GALARZA, JR. and VICTOR QUINONES, 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, in that they, the said LUIS GALARZA, JR. and VICTOR QUINONES, acting in concert, on or about and

between the 15th day of April, 2025 and the 15th day of May, 2025 in Erie County and elsewhere, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with the intent to sell it.

ONE HUNDRED SEVENTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, LUIS GALARZA, JR. and VICTOR QUINONES, of the crime of **OPERATING AS A MAJOR TRAFFICKER**, in violation of Section 220.77(3) of the Penal Law of the State of New York, in that they, the said LUIS GALARZA, JR. and VICTOR QUINONES, acting in concert, on or about and between the 15th day of March, 2025 and the 15th day of September, 2025, in Erie County and elsewhere, as profiteers, knowingly and unlawfully possessed, on one or more occasions within six months or less, a narcotic drug, to wit: fentanyl, with the intent to sell same, and such narcotic drugs had a total a total aggregate value of seventy-five thousand dollars or more.

NICOLE KEARY
Deputy Attorney General
New York State Organized Crime Task Force

BY: WENDY R. WHITING
Assistant Deputy Attorney General
New York State Organized Crime Task Force

Acting Foreperson
Erie County Special Grand Jury

Dated: August ____, 2026