SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK
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THE PEOPLE OF THE STATE OF NEW YORK

-against-

ANTHONY ORTIZ VASQUEZ
NELPHY REYES PERALTA
NESTOR VASQUEZ VARGAS
DEREK VARGAS
HARRY LAUREANO
JEFFRY DESCHAMPS
CARLOS TORRES A/K/A "PAPITO"
JUAN MANUEL TORRES A/K/A "NEGRO"
HECTOR VASQUEZ
TIFFANY DIAZ FERMIN
IRIS MOLINA
KIARA RODRIGUEZ
YADIRA VASQUEZ,

INDICTMENT NO.
73069 - 2024

DEFENDANTS.	
 	X

COUNT 1

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, NESTOR VASQUEZ VARGAS, DEREK VARGAS, HARRY LAUREANO, JEFFRY DESCHAMPS, CARLOS TORRES a/k/a "PAPITO" (hereinafter, "CARLOS TORRES"), JUAN MANUEL TORRES a/k/a "NEGRO" (hereinafter, "JUAN MANUEL TORRES"), HECTOR VASQUEZ, TIFFANY DIAZ FERMIN, IRIS MOLINA, KIARA RODRIGUEZ and YADIRA VASQUEZ, of the crime of CONSPIRACY IN THE FOURTH DEGREE, in violation of Section 105.10(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between October 23, 2023 and June 5, 2024, in New York County, Queens County and elsewhere inside and outside the state of New York, including the state of New Jersey, with intent that conduct constituting the crime of Criminal Sale of a Firearm in the First Degree, in violation of Section 265.13(2) of the Penal Law of the State of New York, said crime being a class B felony, be committed, the defendants, did knowingly and intentionally agree with each other and with others, known and unknown, to engage in and cause the performance of such conduct as would constitute the above-mentioned class B felony.

PREAMBLE

It was the purpose of this conspiracy to obtain, possess, control, transport and sell firearms in New York County, Queens County and the state of New Jersey, and to collect the proceeds from the sale of those firearms.

It was the role of ANTHONY ORTIZ VASQUEZ to obtain firearms from NELPHY REYES PERALTA, NESTOR VASQUEZ VARGAS, DEREK VARGAS, JEFFRY DESCHAMPS and HARRY LAUREANO for resale to an individual known to the Grand Jury.

It was the role of NELPHY REYES PERALTA, NESTOR VASQUEZ VARGAS, DEREK VARGAS, JEFFRY DESCHAMPS and HARRY LAUREANO to supply firearms to ANTHONY ORTIZ VASQUEZ for resale.

It was the role of HECTOR VASQUEZ, CARLOS TORRES, JUAN MANUEL TORRES, YADIRA VASQUEZ and KIARA RODRIGUEZ to transport

firearms from the state of New Jersey to New York County and elsewhere inside the state of New York in furtherance of the sale of firearms.

It was the role of IRIS MOLINA, TIFFANY DIAZ FERMIN, HECTOR VASQUEZ and KIARA RODRIGUEZ to store firearms in anticipation of the firearms sales.

It was the role of IRIS MOLINA, YADIRA VASQUEZ, CARLOS TORRES and JUAN MANUEL TORRES to send money transfers through Zelle and CashApp as payment for the firearms, prior to the firearm sales.

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

OVERT ACTS

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

- 1. On or about October 23, 2023, HECTOR VASQUEZ drove ANTHONY ORTIZ VASQUEZ to the vicinity of West 178th Street and Wadsworth Avenue, New York County, New York for the purpose of reselling a firearm to an individual known to the Grand Jury.
- 2. On or about December 13, 2023, **HECTOR VASQUEZ** drove **ANTHONY ORTIZ VASQUEZ** to the vicinity of West 178th Street and Wadsworth Avenue, New York County, New York for the purpose of reselling three firearms to an individual known to the Grand Jury.

- 3. On or about January 10, 2024, ANTHONY ORTIZ VASQUEZ and NELPHY REYES PERALTA had a phone conversation, during which NELPHY REYES PERALTA stated, in sum and substance, "That nigga not answering, but I got my, I got my, I'll give you my forty." ANTHONY ORTIZ VASQUEZ replied, in sum and substance, "A forty what? Glock?" to which NELPHY REYES PERALTA stated, in sum and substance, "Yes".
- 4. On or about January 15, 2024, ANTHONY ORTIZ VASQUEZ and NELPHY REYES PERALTA had a phone conversation, during which ANTHONY ORTIZ VASQUEZ stated to NELPHY REYES PERALTA in sum and substance "I need four for tomorrow and the two toys" to which NELPHY REYES PERALTA responded, "How much do you think I can get?", and ANTHONY ORTIZ VASQUEZ agreed to pay NELPHY REYES PERALTA \$1,700 for a Glock 17 firearm for resale to an individual known to the Grand Jury.
- 5. On or about January 19, 2024, ANTHONY ORTIZ VASQUEZ and NELPHY REYES PERALTA had a phone conversation, during which ANTHONY ORTIZ VASQUEZ asked NELPHY REYES PERALTA, in sum and substance, "Yo! Do you have a gun, man?" to which NELPHY REYES PERALTA replied, in sum and substance, "No, I don't got shit with me right now, my nigga. Nothing my nigga. He is selling one to me and I am going to buy it tomorrow. A Glock 30, do you hear me? Your enemy is

- selling it to me". Thereafter, **NELPHY REYES PERALTA** stated, in sum and substance, "It's a Glock 30, with a switch on it and everything and a drum.... I am going to pay \$1,000 and we sell it to the guy for more". **ANTHONY ORTIZ VASQUEZ** replied, in sum and substance, "Go for it".
- 6. On January 20, 2024, ANTHONY ORTIZ VASQUEZ and HARRY LAUREANO had a phone conversation, during which, HARRY LAUREANO asked, in sum and substance, "Yo, a two, a two, five, how much is it?" to which ANTHONY ORTIZ VASQUEZ replied, in sum and substance, "A 25?" and HARRY LAUREANO said, in sum and substance, "Yeah, chromed". Thereafter, HARRY LAUREANO stated, in sum and substance, "It like a handgun, he told me. I know it's not expensive" to which ANTHONY ORTIZ VASQUEZ replied, in sum and substance, "Yeah, he is selling it, is that it?" HARRY LAUREANO stated, in sum and substance, "Yeah. I want to buy it" to which ANTHONY ORTIZ VASQUEZ asked, "For how much?" Thereafter, HARRY LAUREANO stated, in sum and substance, "No, I don't know if it's old, but I'll find out. I'll get you a picture and I'll send to you".
- 7. On January 21, 2024, ANTHONY ORTIZ VASQUEZ and NELPHY REYES PERALTA had a phone conversation during which ANTHONY ORTIZ VASQUEZ inquired of NELPHY REYES PERALTA if NELPHY REYES PERALTA had procured a firearm for resale to an individual

- known to the Grand Jury, to which **NELPHY REYES PERALTA** replied, "Yes, yes, yes".
- 8. On January 22, 2024, ANTHONY ORTIZ VASQUEZ and CARLOS TORRES engaged in a phone conversation, in which ANTHONY ORTIZ VASQUEZ told CARLOS TORRES, in sum and substance, "I left the other magazine", to which CARLOS TORRES replied, in sum and substance, "I have it here, calm down".
- 9. On January 23, 2024, ANTHONY ORTIZ VASQUEZ and CARLOS TORRES drove together in a blue Acura with New Jersey license plate number Y55RYB from 29 Sherman Avenue, Paterson, New Jersey to the vicinity of West 178th Street and Wadsworth Avenue, New York County, New York, for the purposes of reselling three firearms to an individual known to the Grand Jury.
- 10.On January 23, 2024, ANTHONY ORTIZ VASQUEZ and DEREK VARGAS had a phone conversation, during which ANTHONY ORTIZ VASQUEZ stated in sum and substance, "I am working in New York...so you know that is for sure anyway".
- 11.On January 25, 2024, ANTHONY ORTIZ VASQUEZ and NESTOR VARGAS VASQUEZ had a phone conversation, during which NESTOR VARGAS VASQUEZ stated, in sum and substance, "Look, I was going to ask you if you want me to send that to you tomorrow. Just with the button or you want me to send you all that on Saturday with the panty because

they get here on Saturday" to which ANTHONY ORTIZ VASQUEZ replied, in sum and substance, "Send me that and only send me one panty and then the others whenever". Thereafter, NESTOR VARGAS VASQUEZ stated, in sum and substance, "Papi listen to me, listen to me, listen to me. Right now they're offering me two Glocks 22, 40, 4th generation, new in the box bro, and I'm going to tell you how much they're going for... hold on, don't hang up, they sent me the message. I'm not making anything on this. How much for two? Ah, each one if you want them with the two clips at 1,000 bucks each".

12. On January 28, 2024, TIFFANY DIAZ FERMIN sent a text message to an individual known to the Grand Jury, which stated, in sum and substance, "He selling it to you right". Shortly thereafter, TIFFANY DIAZ FERMIN engaged in a phone conversation with an individual known to the Grand Jury, during which she stated, in sum and substance, "He doesn't... I know. I am not going to do nothing stupid. I am from the street as well. So I know what he moves, you know? I know what I am doing, believe me.... It's cool. It's cool. I got you. His girl told me to do it, because he is going to be okay with it. Because he was going to sell you... what is going to sell you, it's already paid, from his side.... That's what I want you to understand. Cause I already know because the money was moving through me.... The one that he sent you, the one that he sent you the pictures... he was speaking about it to you and all that in front of me".

- 13. On January 31, 2024, ANTHONY ORTIZ VASQUEZ and DEREK VARGAS engaged in a phone conversation, during which ANTHONY ORTIZ VASQUEZ asked DEREK VARGAS, in sum and substance, "When are you going to bring it? I will go on Wednesday" to which DEREK VARGAS replied, in sum and substance, "Sounds good. One day before". Thereafter, ANTHONY ORTIZ VASQUEZ stated, in sum and substance, "You have to bring that to my house. Nelphy is going to take me, so we will go straight from here".
- 14.On January 31, 2024, ANTHONY ORTIZ VASQUEZ and DEREK VARGAS engaged in a phone conversation, during which ANTHONY ORTIZ VASQUEZ stated, in sum and substance, "Those are caliber 22 bro, those are very small bro" to which DEREK VARGAS replied, in sum and substance, "Yeah I know". Further, DEREK VARGAS stated, in sum and substance, "That is 22".
- 15. On January 31, 2024, at the direction of ANTHONY ORTIZ VASQUEZ,

 TIFFANY DIAZ FERMIN transferred \$1,150 to NESTOR VASQUEZ

 VARGAS, via CashApp as payment for a firearm.
- 16.On January 31, 2024, ANTHONY ORTIZ VASQUEZ had a phone conversation with IRIS MOLINA, in which ANTHONY ORTIZ VASQUEZ told IRIS MOLINA, in sum and substance, "I'm going to send you, I'm going to send you a bag right now with an AR-15 and a 9 inside and I'm going to go pick it up on Thursday, right away tomorrow because I

- have to go to New York on Friday" to which IRIS MOLINA replied, in sum and substance, "But tomorrow, are they going to check your apartment tomorrow?.... And you're coming to get it after, right?"
- 17. On January 31, 2024, ANTHONY ORTIZ VASQUEZ had a phone conversation with DEREK VARGAS, in which ANTHONY ORTIZ VASQUEZ discussed an upcoming firearms sale to an individual known to the Grand Jury. ANTHONY ORTIZ VASQUEZ asked DEREK VARGAS, in sum and substance, "When are you going to bring it? I will go on Wednesday", to which DEREK VARGAS replied, in sum and substance, "Sounds good. One day before". ANTHONY ORTIZ VASQUEZ stated to DEREK VARGAS, in sum and substance, "...Tomorrow then, because I am going Friday to New York".
- 18.On February 2, 2024, ANTHONY ORITZ VASQUEZ had a phone conversation with IRIS MOLINA, in which ANTHONY ORTIZ VASQUEZ told IRIS MOLINA, in sum and substance, "Ma, take a picture" to which IRIS MOLINA replied, in sum and substance, "Of what?" and ANTHONY ORTIZ VASQUEZ said, in sum and substance, "The one that is wrapped in a blanket". IRIS MOLINA then stated, in sum and substance, "I already snapped it and I sent it to Kiki".
- 19. On February 2, 2024, **JEFFRY DESCHAMPS**, **HECTOR VASQUEZ** and **ANTHONY ORTIZ VASQUEZ** traveled to West 178th Street and

- Wadsworth Avenue in New York County, New York to meet with an individual known to the Grand Jury and sold this individual three firearms.
- 20. On February 6, 2024, **CARLOS TORRES** sent an individual known to the Grand Jury a multimedia message containing a photograph of a black handgun.
- 21. On February 3, 2024, a United States Postal Service package containing a firearm from NESTOR VASQUEZ VARGAS was delivered to 29 Sherman Avenue, Paterson, New Jersey. KIARA RODRIGUEZ retrieved this package from the front porch of 29 Sherman Avenue, Paterson, New Jersey and brought the package inside the residence. On February 7, 2024, ANTHONY ORTIZ VASQUEZ, HECTOR VASQUEZ, CARLOS TORRES and JUAN MANUEL TORRES resold this firearm to an individual known to the Grand Jury in the vicinity of 178th Street and Wadsworth Avenue, New York County, New York.
- 22.On February 5, 2024, at ANTHONY ORTIZ VASQUEZ'S February 7, 2024 in New York County, to an individual known to the Grand Jury direction, TIFFANY DIAZ FERMIN transferred \$400 to NESTOR VASQUEZ VARGAS via CashApp as partial payment for the firearm resold to an individual known to the Grand Jury on February 7, 2024.
- 23. On February 15, 2024, ANTHONY ORTIZ VASQUEZ provided \$2,700 to KIARA RODRIGUEZ for the purpose of paying NELPHY REYES

- **PERALTA** the proceeds from the sale of two firearms to an individual known to the Grand Jury.
- 24. On February 20, 2024, ANTHONY ORTIZ VASQUEZ had a phone conversation with JUAN MANUEL TORRES in which ANTHONY ORTIZ VASQUEZ stated, in sum and substance, "They are selling me a cheap one.... A rifle. R15, mini, sport.... I will give you, send me \$200 and I will give you \$500. Tuesday, to bring some in the pocket. If you want, you know....Give me \$200 and I will give you \$500.... For Tuesday, faggot, this Tuesday, that I am going to New York. I bought two small ones and that one right now and two switches from Nelphy". In response, JUAN MANUEL TORRES stated, in sum and substance, "I will give you that when I get there".
- 25.On February 21, 2024, ANTHONY ORTIZ VASQUEZ and NELPHY REYES PERALTA engaged in a phone conversation where ANTHONY ORTIZ VASQUEZ asked NELPHY REYES PERALTA, in sum and substance, "What's up, Friday are we going down? The guy told me to on Friday, are you going to have it?" to which NELPHY REYES PERALTA replied, in sum and substance, "Yeah".
- 26.On February 22, 2024, YADIRA VASQUEZ sent a money transfer in the amount of \$450 to NESTOR VASQUEZ VARGAS as payment for a firearm.

- 27. On February 29, 2024, ANTHONY ORTIZ VASQUEZ and CARLOS TORRES engaged in a telephone conversation in which ANTHONY ORTIZ VASQUEZ and CARLOS TORRES discuss firearms to sell to an individual known to the Grand Jury, "...I am waiting for the guy from New York to call me. He told me that he will see me tomorrow". CARLOS TORRES asked, in sum and substance, "Is he going to take the one that they sent you?" to which ANTHONY ORTIZ VASQUEZ replied, in sum and substance, "....Yes, we are going to take that one as well".
- 28. On March 2, 2024, ANTHONY ORTIZ VASQUEZ and NELPHY REYES
 PERALTA engaged in a telephone conversation in which ANTHONY
 ORTIZ VASQUEZ asked NELPHY REYES PERALTA in sum and substance, "Okay, but I am going over there on Tuesday. Can I have it Monday so I can get it...?" to which NELPHY REYES PERALTA replied, in sum and substance, "For sure, for sure, for sure, I'll have it Monday".

 On March 7, 2024, ANTHONY ORTIZ VASQUEZ and JUAN MANUEL TORRES met an individual known to the Grand Jury in the vicinity of 178th Street and Wadsworth Avenue, New York County, New York for the sale of six firearms. Following this firearm sale, ANTHONY ORTIZ VASQUEZ and HECTOR VASQUEZ engaged in a phone conversation in which ANTHONY ORTIZ VASQUEZ stated, in sum and substance, "...from the 2,000 that are mine, take 100 bucks for yourself, you heard? You told me to give you 1,200 2,200" to which HECTOR VASQUEZ

- replied, in sum and substance, "That's what I'm saying, because you were going to give me 2,300 supposedly for...for...." Thereafter, ANTHONY ORTIZ VASQUEZ said, in sum and substance, "Yes, Papi, that's fine, that's fine".
- 29. On March 7, 2024, following the resale of firearms to an individual known to the Grand Jury, ANTHONY ORTIZ VASQUEZ and NELPHY REYES PERALTA engaged in a phone conversation in which ANTHONY ORTIZ VASQUEZ reported the proceeds of the firearms resale, "...for the Smith and Wesson, that one, what they wanted to give me was 1000 bucks, bro.... I am on my way now, but you know, I'm calling you because that is not mine, faggot.... I have 1,300 for the Glock, though, you heard?" NELPHY REYES PERALTA told ANTHONY ORTIZ VASQUEZ, in sum and substance, "Like we said. What we said. 1,400, nigga".
- 30. On March 13, 2024, ANTHONY ORTIZ VASQUEZ met with NELPHY REYES PERALTA and NELPHY REYES PERALTA removed a black rifle bag from one vehicle and entered ANTHONY ORTIZ VASQUEZ's residence. Shortly thereafter, JUAN MANUAL TORRES entered ANTHONY ORTIZ VASQUEZ's residence and exited carrying a black rifle bag.
- 31.On March 13, 2024, following the resale of firearms in New York County,
 New York, to an individual known to the Grand Jury, **ANTHONY ORTIZ**VASQUEZ and NELPHY REYES PERALTA had a phone conversation,

during which ANTHONY ORTIZ VASQUEZ told NELPY REYES PERLTA, in sum and substance, "...I got the money.... I'm going to give you 1,700 so I can keep 300 for myself.... 1,700. I'm only going to take 100. I only bring that for you, I don't bring nothing else". NELPHY REYES PERALTA responded, in sum and substance, "Alright, sounds good, sounds good...."

- 32.On March 18, 2024, ANTHONY ORTIZ VASQUEZ and NESTOR VARGAS VASQUEZ had a phone conversation, during which NESTOR VARGAS VASQUEZ stated, in sum and substance, "Listen, listen, what I'm going to do is send you the piece first bro and the Rifles I'm going to send. On Thursday, I get the rods, what do I mean...the things I use to make the switches.... So I'm going to send you the piece first and then I'll send you the rifle.... The one piece and then Thursday I'll send you the two rifles".
- 33.On April 17, 2024, **ANTHONY ORTIZ VASQUEZ, CARLOS TORRES** and **JUAN MANUEL TORRES** met with an individual known to the Grand Jury in the vicinity of 135-05 20th Avenue, Queens County, New York. During this meeting, **CARLOS TORRES** placed a rifle and shotgun in this individual's vehicle and **ANTHONY ORTIZ VASQUEZ** handed this individual a handgun.
- 34.On June 5, 2024, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ met with an individual known to the Grand

Jury, in the vicinity of West 178th Street and Wadsworth Avenue, New York County, for the purpose of selling six firearms. During this meeting, **KIARA RODRIGUEZ** handed the individual known to the Grand Jury firearm ammunition.

COUNT 2

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **NELPHY REYES PERALTA**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE**, in violation of Section 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 10, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 27 Gen5 pistol (Serial #BXAU385), one 5.7 x 28 millimeter (hereinafter, "mm") caliber semi-automatic Palmetto State Armory 5.7 Rock pistol (Serial #RK024640) and one 5.56 x 45mm caliber semi-automatic Palmetto State Armory PSAF-556 rifle (Serial #A5K001958).

COUNT 3

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **NELPHY REYES PERALTA**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE**, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 10, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 27 Gen5 pistol (Serial #BXAU385), one 5.7 x 28mm caliber semi-automatic Palmetto State Armory 5.7 Rock pistol (Serial #RK024640) and one 5.56 x 45mm caliber semi-automatic Palmetto State Armory PSAF-556 rifle (Serial #A5K001958).

COUNT 4

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and NELPHY REYES PERALTA, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 10, 2024, in New York County, did possess three or more firearms, to wit: one 40 Smith & Wesson caliber semi-automatic Glock 27 Gen5 pistol (Serial #BXAU385), one 5.7 x 28mm caliber semi-automatic Palmetto State Armory 5.7 Rock pistol (Serial #RK024640) and one 5.56 x 45mm caliber semi-automatic Palmetto State Armory PSAF-556 rifle (Serial #A5K001958).

COUNT 5

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **NELPHY REYES PERALTA** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 10, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 27 Gen5 pistol (Serial #BXAU385).

COUNT 6

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and NELPHY REYES PERALTA,

of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 10, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 15-round magazine (NYPD Invoice No. 1001733979, Invoice Item 2, Lab Item 69).

COUNT 7

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **NELPHY REYES PERALTA**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 10, 2024, in New York County, did possess a loaded firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 27 Gen5 pistol (Serial #BXAU385) and such possession took place outside the defendant's home or place of business.

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

COUNT 8

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

Said defendant, on or about January 10, 2024, in New York County, did possess a firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 27 Gen5 pistol (Serial #BXAU385).

COUNT 9

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **NELPHY REYES PERALTA**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 10, 2024, in New York County, did possess a firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 27 Gen5 pistol (Serial #BXAU385).

COUNT 10

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL SALE

OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 10, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 5.7 x 28mm caliber semi-automatic Palmetto State Armory 5.7 Rock pistol (Serial #RK024640).

COUNT 11

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

Said defendant, on or about January 10, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 23-round magazine (NYPD Invoice No. 1001733972, Invoice Item 2, Lab Item 65).

COUNT 12

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

Said defendant, on or about January 10, 2024, in New York County, did possess a firearm, to wit: one 5.7 x 28mm caliber semi-automatic Palmetto State Armory 5.7 Rock pistol (Serial #RK024640).

COUNT 13

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

Said defendant, on or about January 10, 2024, in New York County, did possess an assault weapon, to wit: one 5.7 x 28mm caliber semi-automatic Palmetto State Armory 5.7 Rock pistol (Serial #RK024640), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine and a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer.

COUNT 14

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

Said defendant, on or about January 10, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 23-round magazine (NYPD Invoice No. 1001733972, Invoice Item 2, Lab Item 65).

COUNT 15

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

Said defendant, on or about January 10, 2024, in New York County, did possess a firearm, to wit: one 5.7 x 28mm caliber semi-automatic Palmetto State Armory 5.7 Rock pistol (Serial #RK024640).

COUNT 16

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

Said defendant, on or about January 10, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 5.56 x 45mm caliber semi-automatic Palmetto State Armory PSAF-556 rifle (Serial #A5K001958).

COUNT 17

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

Said defendant, on or about January 10, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 30-round magazine (NYPD Invoice No. 1001733952, Invoice Item 4, Lab Item 74).

COUNT 18

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 10, 2024, in New York County, did possess a loaded firearm, to wit: one 5.56 x 45mm caliber semi-automatic Palmetto State Armory PSAF-556 rifle (Serial #A5K001958) and such possession took place outside the defendant's home or place of business.

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

COUNT 19

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

Said defendant, on or about January 10, 2024, in New York County, did possess a firearm, to wit: one 5.56 x 45mm caliber semi-automatic Palmetto State Armory PSAF-556 rifle (Serial #A5K001958).

COUNT 20

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

Said defendant, on or about January 10, 2024, in New York County, did possess an assault weapon, to wit: one 5.56 x 45mm caliber semi-automatic Palmetto State Armory PSAF-556 rifle (Serial #A5K001958), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a folding stock, a pistol grip that protrudes conspiculously beneath the

action of the weapon, a second handgrip that can be held by the non-trigger hand, a flash suppressor muzzle break, muzzle compensator, or threaded barrel designed to accommodate a flash suppressor, muzzle brake or muzzle compensator and a barrel length of 17 ¾ inches, an overall length of 35 ¼ inches and folded length of 28 inches.

COUNT 21

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

Said defendant, on or about January 10, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 30-round magazine (NYPD Invoice No. 1001733952, Invoice Item 4, Lab Item 74).

COUNT 22

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

Said defendant, on or about January 10, 2024, in New York County, did possess a firearm, to wit: one 5.56 x 45mm caliber semi-automatic Palmetto State Armory PSAF-556 rifle (Serial #A5K001958).

COUNT 23

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **NELPHY REYES PERALTA**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE**, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber full-automatic Glock 17 Gen4 pistol (Serial #BCHM637) and one 9mm Luger caliber semi-automatic SCCY CPX-2 pistol (Serial #C225358).

COUNT 24

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **NELPHY REYES PERALTA**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber full-automatic Glock 17 Gen4 pistol (Serial #BCHM637).

COUNT 25

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **NELPHY REYES PERALTA**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 41-round magazine (NYPD Invoice No. 1001736925, Invoice Item 4, Lab Item 79).

COUNT 26

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and NELPHY REYES PERALTA, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND

DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber full-automatic Glock 17 Gen4 pistol (Serial #BCHM637) and such possession took place outside the defendant's home or place of business.

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

COUNT 27

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

Said defendant, on or about January 17, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber full-automatic Glock 17 Gen4 pistol (Serial #BCHM637).

COUNT 28

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and NELPHY REYES PERALTA, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD

DEGREE, in violation of Section 265.02(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in New York County, did possess a machine-gun, to wit: one 9mm Luger caliber full-automatic Glock 17 Gen4 pistol (Serial #BCHM637) with an attached selector switch capable of firing in semi-automatic and full automatic actions.

COUNT 29

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **NELPHY REYES PERALTA**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber full-automatic Glock 17 Gen4 pistol (Serial #BCHM637).

COUNT 30

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and NELPHY REYES PERALTA, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 41-round magazine (NYPD Invoice No. 1001736925, Invoice Item 4, Lab Item 79).

COUNT 31

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **NELPHY REYES PERALTA**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic SCCY CPX-2 pistol (Serial #C225358).

COUNT 32

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and NELPHY REYES PERALTA, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND

DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber semi-automatic SCCY CPX-2 pistol (Serial #C225358) and such possession took place outside the defendant's home or place of business.

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

COUNT 33

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

Said defendant, on or about January 17, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic SCCY CPX-2 pistol (Serial #C225358).

COUNT 34

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **NELPHY REYES PERALTA**,

of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic SCCY CPX-2 pistol (Serial #C225358).

COUNT 35

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **NELPHY REYES PERALTA**, of the crime of **CRIMINAL POSSESSION OF A RAPID-FIRE MODIFICATION DEVICE**, in violation of Section 265.01-c of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in New York County, did knowingly possess a rapid-fire modification device.

COUNT 36

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and NELPHY REYES PERALTA, of the crime of CRIMINAL POSSESSION OF A RAPID-FIRE MODIFICATION DEVICE, in violation of Section 265.01-c of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in New York County, did knowingly possess a rapid-fire modification device.

COUNT 37

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **NELPHY REYES PERALTA**, of the crime of **CRIMINAL POSSESSION OF A RAPID-FIRE MODIFICATION DEVICE**, in violation of Section 265.01-c of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in New York County, did knowingly possess a rapid-fire modification device.

COUNT 38

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **NELPHY REYES PERALTA**, of the crime of **CRIMINAL POSSESSION OF A RAPID-FIRE MODIFICATION DEVICE**, in violation of Section 265.01-c of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 17, 2024, in New York County, did knowingly possess a rapid-fire modification device.

COUNT 39

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **CARLOS TORRES**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE**, in violation of Section 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber semi-automatic SCCY Industries CPX-2 pistol (Serial #C476940), one 10mm auto caliber semi-automatic Glock 20 Gen 5 pistol with a defaced serial number (NYPD lead seal #366487) and one .25 auto caliber semi-automatic Raven Arms P-25 pistol (Serial #254684).

COUNT 40

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and CARLOS TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in

violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber semi-automatic SCCY Industries CPX-2 pistol (Serial #C476940), one 10mm auto caliber semi-automatic Glock 20 Gen 5 pistol with a defaced serial number (NYPD lead seal #366487) and one .25 auto caliber semi-automatic Raven Arms P-25 pistol (Serial #254684).

COUNT 41

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **CARLOS TORRES**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, did possess three or more firearms, to wit: one 9mm Luger caliber semi-automatic SCCY Industries CPX-2 pistol (Serial #C476940), one 10mm auto caliber semi-automatic Glock 20 Gen 5 pistol with a defaced serial number (NYPD lead seal #366487) and one 25 auto caliber semi-automatic Raven Arms P-25 pistol (Serial #254684).

COUNT 42

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, DEREK VARGAS and CARLOS TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic SCCY Industries CPX-2 pistol (Serial #C476940).

COUNT 43

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ, DEREK VARGAS** and **CARLOS TORRES,** of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person

a large capacity ammunition feeding device, to wit: one 11-round magazine (NYPD Invoice No. 1001739377, Invoice Item 2, Lab Item 84).

COUNT 44

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, DEREK VARGAS and CARLOS TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 11-round magazine (NYPD Invoice No. 1001739377, Invoice Item 4, Lab Item 86).

COUNT 45

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, DEREK VARGAS and CARLOS TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber semi-automatic SCCY Industries CPX-2 pistol (Serial #C476940) and such possession took place outside the defendant's home or place of business.

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

COUNT 46

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

Said defendant, on or about January 23, 2024, in New York County, did possess a firearm, to wit one 9mm Luger caliber semi-automatic SCCY Industries CPX-2 pistol (Serial #C476940).

COUNT 47

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, DEREK VARGAS and CARLOS TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 11-round magazine (NYPD Invoice No. 1001739377, Invoice Item 2, Lab Item 84).

COUNT 48

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, DEREK VARGAS and CARLOS TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 11-round magazine (NYPD Invoice No. 1001739377, Invoice Item 4, Lab Item 86).

COUNT 49

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ, DEREK VARGAS** and **CARLOS TORRES**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic SCCY Industries CPX-2 pistol (Serial #C476940).

COUNT 50

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and CARLOS TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 10mm auto caliber semi-automatic Glock 20 Gen 5 pistol with a defaced serial number (NYPD lead seal #366487).

COUNT 51

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

Said defendant, on or about January 23, 2024, in New York County, did possess a firearm, to wit one 10mm auto caliber semi-automatic Glock 20 Gen 5 pistol with a defaced serial number (NYPD lead seal #366487).

COUNT 52

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and CARLOS TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, did possess firearm, to wit: one 10mm auto caliber semi-automatic Glock 20 Gen 5 pistol with a defaced serial number (NYPD lead seal #366487), which had been defaced for the purpose of concealment or prevention of the detection of a crime or misrepresenting the identify of such.

COUNT 53

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA** and **CARLOS TORRES**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, did possess a firearm, to wit: one 10mm auto caliber semi-automatic Glock 20 Gen 5 pistol with a defaced serial number (NYPD lead seal #366487).

COUNT 54

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, CARLOS TORRES, and HARRY LAUREANO, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .25 auto caliber semi-automatic Raven Arms P-25 pistol (Serial #254684).

COUNT 55

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, CARLOS TORRES, and HARRY LAUREANO, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE

SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, did possess a loaded firearm, to wit: one .25 auto caliber semi-automatic Raven Arms P-25 pistol (Serial #254684) and such possession took place outside the defendant's home or place of business.

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

COUNT 56

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

Said defendant, on or about January 23, 2024, in New York County, did possess a firearm, to wit: one .25 auto caliber semi-automatic Raven Arms P-25 pistol (Serial #254684).

COUNT 57

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, CARLOS TORRES, and HARRY LAUREANO, of the crime of CRIMINAL POSSESSION OF A FIREARM, in

violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about January 23, 2024, in New York County, did possess a firearm, to wit: one .25 auto caliber semi-automatic Raven Arms P-25 pistol (Serial #254684).

COUNT 58

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, **ANTHONY ORTIZ VASQUEZ** and **JEFFRY DESCHAMPS** of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE**, in violation of Section 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 2, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one .45 auto caliber semi-automatic Hi-Point JHP pistol (Serial #X429539), one .22 long rifle caliber semi-automatic Mossberg International 715T pistol (Serial #ELE3386768) and one 12 gauge pump action Benelli Nova Pump Action cut-down shotgun (Serial #Z567311L).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, and DEREK VARGAS and JEFFRY DESCHAMPS, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 2, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one .45 auto caliber semi-automatic Hi-Point JHP pistol (Serial #X429539), one .22 long rifle caliber semi-automatic Mossberg International 715T pistol (Serial #ELE3386768) and one 12 gauge pump action Benelli Nova Pump Action cut-down shotgun (Serial #Z567311L).

COUNT 60

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, **ANTHONY ORTIZ VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about February 2, 2024, in New York County, did possess three or more firearms, to wit: one .45 auto caliber semi-automatic Hi-Point JHP pistol (Serial #X429539), one .22 long rifle caliber semi-automatic Mossberg

International 715T pistol (Serial #ELE3386768) and one 12 gauge pump action Benelli Nova Pump Action cut-down shotgun (Serial #Z567311L).

COUNT 61

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

Said defendant, on or about February 2, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .45 auto caliber semi-automatic Hi-Point JHP pistol (Serial #X429539).

COUNT 62

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about February 2, 2024, in New York County, did possess a loaded firearm, to wit: one .45 auto caliber semi-automatic Hi-Point JHP pistol (Serial #X429539) and such possession took place outside the defendant's home or place of business.

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

COUNT 63

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

Said defendant, on or about February 2, 2024, in New York County, did possess a firearm, to wit: one .45 auto caliber semi-automatic Hi-Point JHP pistol (Serial #X429539).

COUNT 64

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

Said defendant, on or about February 2, 2024, in New York County, did possess a firearm, to wit: one .45 auto caliber semi-automatic Hi-Point JHP pistol (Serial #X429539).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **DEREK VARGAS**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 2, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .22 long rifle caliber semi-automatic Mossberg International 715T pistol (Serial #ELE3386768).

COUNT 66

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, DEREK VARGAS and JEFFRY DESCHAMPS, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 2, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 20-round magazine (NYPD Invoice No. 1001744098, Invoice Item 3, Lab Item 99).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **DEREK VARGAS**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 2, 2024, in New York County, did possess a loaded firearm, to wit: one .22 long rifle caliber semi-automatic Mossberg International 715T pistol (Serial #ELE3386768) and such possession took place outside the defendant's home or place of business.

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

COUNT 68

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about February 2, 2024, in New York County, did possess a firearm, to wit: one .22 long rifle caliber semi-automatic Mossberg International 715T pistol (Serial #ELE3386768).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **DEREK VARGAS**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 2, 2024, in New York County, did possess an assault weapon, to wit: one 22 long rifle caliber semi-automatic Mossberg International 715T pistol (Serial #ELE3386768), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip and a shroud that is attached to, or partially or completely encircles the barrel and that permits the shooter to hold the firearm with the non-trigger hand without being burned.

COUNT 70

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **DEREK VARGAS**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 2, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 20-round magazine (NYPD Invoice No. 1001744098, Invoice Item 3, Lab Item 99).

COUNT 71

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **DEREK VARGAS**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 2, 2024, in New York County, did possess a firearm, to wit: one .22 long rifle caliber semi-automatic Mossberg International 715T pistol (Serial #ELE3386768).

COUNT 72

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, DEREK VARGAS and JEFFRY DESCHAMPS, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 2, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 12-gauge pump action Benelli Nova Pump Action cut-down shotgun (Serial #Z567311L).

COUNT 73

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

Said defendant, acting in concert with each other and others, on or about February 2, 2024, in New York County, did possess a firearm, to wit: one 12-gauge pump action Benelli Nova Pump Action cut-down shotgun (Serial #Z567311L).

COUNT 74

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **DEREK VARGAS**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in convert with each other, on or about February 2, 2024, in New York County, did possess a firearm, to wit: one 12 gauge pump action Benelli Nova Pump Action cut-down shotgun (Serial #Z567311L).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, HECTOR VASQUEZ, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 7, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber semi-automatic Hi-Point C9 pistol (Serial #P1055308) and one 9mm Luger caliber semi-automatic Ruger P95 pistol (Serial #316-47178).

COUNT 76

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, HECTOR VASQUEZ, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 7, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person

a firearm, to wit: one 9mm Luger caliber semi-automatic Hi-Point C9 pistol (Serial #P1055308).

COUNT 77

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

Said defendant, on or about February 7, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Hi-Point C9 pistol (Serial #P1055308).

COUNT 78

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, HECTOR VASQUEZ, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 7, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Hi-Point C9 pistol (Serial #P1055308).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, HECTOR VASQUEZ, JUAN MANUEL TORRES, CARLOS TORRES, NESTOR VARGAS VASQUEZ, TIFFANY DIAZ FERMIN and KIARA RODRIGUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 7, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Ruger P95 pistol (Serial #316-47178).

COUNT 80

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, HECTOR VASQUEZ, JUAN MANUEL TORRES, CARLOS TORRES, NESTOR VARGAS VASQUEZ, TIFFANY DIAZ FERMIN and KIARA RODRIGUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 7, 2024, in New York County, while not authorized pursuant to law to

possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 15-round magazine (NYPD Invoice No. 1001746132, Invoice Item 2, Lab Item 103)

COUNT 81

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

Said defendant, on or about February 7, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Ruger P95 pistol (Serial #316-47178).

COUNT 82

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, HECTOR VASQUEZ, JUAN MANUEL TORRES, CARLOS TORRES, NESTOR VARGAS VASQUEZ, TIFFANY DIAZ FERMIN and KIARA RODRIGUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 7, 2024, in New York County, did possess a large capacity ammunition

feeding device, to wit: one 15-round magazine (NYPD Invoice No. 1001746132, Invoice Item 2, Lab Item 103).

COUNT 83

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, HECTOR VASQUEZ, JUAN MANUEL TORRES, CARLOS TORRES, NESTOR VARGAS VASQUEZ, TIFFANY DIAZ FERMIN and KIARA RODRIGUEZ, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 7, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Ruger P95 pistol (Serial #316-47178).

COUNT 84

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 15, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber semi-automatic Taurus PT111 G2A/G2C pistol (Serial #TMS71475) and one .300 Blackout caliber semi-automatic American Tactical Omni Hybrid Maxx RIA P3P rifle (Serial #NS249585).

COUNT 85

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 15, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Taurus PT111 G2A/G2C pistol (Serial #TMS71475).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 15, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 21-round magazine (NYPD Invoice No. 1001749588, Invoice Item 2, Lab Item 112).

COUNT 87

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 15, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 12-round magazine (NYPD Invoice No. 1001749588, Invoice Item 5, Lab Item 116).

COUNT 88

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each otherand others, on or about February 15, 2024, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber semi-automatic Taurus PT111 G2A/G2C pistol (Serial #TMS71475) and such possession took place outside the defendant's home or place of business.

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

COUNT 89

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL

POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about February 15, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Taurus PT111 G2A/G2C pistol (Serial #TMS71475).

COUNT 90

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 15, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 21-round magazine (NYPD Invoice No. 1001749588, Invoice Item 2, Lab Item 112).

COUNT 91

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the

crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 15, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 12-round magazine (NYPD Invoice No. 1001749588, Invoice Item 5, Lab Item 116).

COUNT 92

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 15, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Taurus PT111 G2A/G2C pistol (Serial #TMS71475).

COUNT 93

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the

crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 15, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .300 Blackout caliber semi-automatic American Tactical Omni Hybrid Maxx RIA P3P rifle (Serial #NS249585).

COUNT 94

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 15, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 29-round magazine (NYPD Invoice No. 1001749619, Invoice Item 2, Lab Item 117).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 15, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 27-round magazine (NYPD Invoice No. 1001749619, Invoice Item 2, Lab Item 117.1).

COUNT 96

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

Said defendant, on or about February 15, 2024, in New York County, did possess a firearm, to wit: one .300 Blackout caliber semi-automatic American Tactical Omni Hybrid Maxx RIA P3P rifle (Serial #NS249585).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 15, 2024, in New York County, did possess an assault weapon, to wit: one .300 Blackout caliber semi-automatic American Tactical Omni Hybrid Maxx RIA P3P rifle (Serial #NS249585), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspiculously beneath the action of the weapon, a second handgrip that can be held by the non-trigger hand, a flash suppressor, muzzle brake, muzzle compensator, or threaded barrel designed to accommodate a flash supressor, muzzle brake or muzzle compensator and a barrel length of 17 3/8 inches, an overall length of 35 5/8 inches and collapsed length of 32 5/8 inches.

COUNT 98

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA,

KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 15, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 29-round magazine (NYPD Invoice No. 1001749619, Invoice Item 2, Lab Item 117).

COUNT 99

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 15, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 27-round magazine (NYPD Invoice No. 1001749619, Invoice Item 2, Lab Item 117.1).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, CARLOS TORRES and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 15, 2024, in New York County, did possess a firearm, to wit: one .300 Blackout caliber semi-automatic American Tactical Omni Hybrid Maxx RIA P3P rifle (Serial #NS249585).

COUNT 101

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE, in violation of Section 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 5 pistol (Serial #BVUA684), one 9mm Luger caliber semi-automatic Polymer80 Inc.

PF940c ghost gun pistol (NYPD Lead Seal #425360) and one 5.56 x 45mm caliber semi-automatic AR-15 style ghost gun rifle (NYPD Lead Seal #425395).

COUNT 102

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 5 pistol (Serial #BVUA684), one 9mm Luger caliber semi-automatic Polymer80 Inc. PF940c ghost gun pistol (NYPD Lead Seal #425360) and one 5.56 x 45mm caliber semi-automatic AR-15 style ghost gun rifle (NYPD Lead Seal #425395).

COUNT 103

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A

WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, did possess three or more firearms, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 5 pistol (Serial #BVUA684), one 9mm Luger caliber semi-automatic Polymer80 Inc. PF940c ghost gun pistol (NYPD Lead Seal #425360) and one 5.56 x 45mm caliber semi-automatic AR-15 style ghost gun rifle (NYPD Lead Seal #425395).

COUNT 104

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 5 pistol (Serial #BVUA684).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 32-round magazine (NYPD Invoice No. 1001753074, Invoice Item 2, Lab Item 135).

COUNT 106

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 5 pistol (Serial #BVUA684) and such possession took place outside the defendant's home or place of business.

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

COUNT 107

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

Said defendant, on or about February 23, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 5 pistol (Serial #BVUA684).

COUNT 108

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 32-round magazine (NYPD Invoice No. 1001753074, Invoice Item 2, Lab Item 135).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, KIARA RODRIGUEZ, and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 5 pistol (Serial #BVUA684).

COUNT 110

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Polymer80 Inc. PF940c ghost gun pistol (NYPD Lead Seal #425360).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 15-round magazine (NYPD Invoice No. 1001753074, Invoice Item 5, Lab Item 138).

COUNT 112

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE, in violation of Section 265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit:

one 9mm Luger caliber semi-automatic Polymer80 Inc. PF940c ghost gun pistol (NYPD Lead Seal #425360).

COUNT 113

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber semi-automatic Polymer80 Inc. PF940c ghost gun pistol (NYPD Lead Seal #425360) and such possession took place outside the defendant's home or place of business.

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

COUNT 114

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

Said defendant, on or about February 23, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Polymer80 Inc. PF940c ghost gun pistol (NYPD Lead Seal #425360).

COUNT 115

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 15-round magazine (NYPD Invoice No. 1001753074, Invoice Item 5, Lab Item 138).

COUNT 116

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Polymer80 Inc. PF940c ghost gun pistol (NYPD Lead Seal #425360).

COUNT 117

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE, in violation of Section 265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23 2024, in New York County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: one 5.56 x 45mm caliber semi-automatic AR-15 style ghost gun rifle (NYPD Lead Seal #425395).

COUNT 118

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM

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

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 5.56 x 45mm caliber semi-automatic AR-15 style ghost gun rifle (NYPD Lead Seal #425395).

COUNT 119

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 30-round magazine (NYPD Invoice No. 1001753069, Invoice Item 2, Lab Item 152).

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

Said defendant, on or about February 23, 2024, in New York County, did possess a firearm, to wit: one 5.56 x 45mm caliber semi-automatic AR-15 style ghost gun rifle (NYPD Lead Seal #425395).

COUNT 121

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, did possess an assault weapon, to wit: one 5.56 x 45mm caliber semi-automatic AR-15 style ghost gun rifle (NYPD Lead Seal #425395), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or

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

COUNT 122

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 30-round magazine (NYPD Invoice No. 1001753069, Invoice Item 2, Lab Item 152).

COUNT 123

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 23, 2024, in New York County, did possess a firearm, to wit: one 5.56 x 45mm caliber semi-automatic AR-15 style ghost gun rifle (NYPD Lead Seal #425395).

COUNT 124

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE, in violation of Section 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber semi-automatic Glock 17 pistol (Serial #NV504 US), one 9mm Luger caliber semi-automatic Glock 17 Gen 5 pistol (Serial #BZMV374), one 9mm Luger caliber semi-automatic Glock 19X pistol (Serial #BWGX874), one .40 Smith & Wesson caliber semi-automatic Glock 22 pistol (Serial #VGH159), one .40 Smith & Wesson caliber semi-automatic SW40V (Serial #PAN9617) and one 7.62 x 39mm caliber semi-automatic Century Arms C39 pistol (Serial #39WM-002204).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber semi-automatic Glock 17 pistol (Serial #NV504 US), one 9mm Luger caliber semi-automatic Glock 17 Gen 5 pistol (Serial #BZMV374), one 9mm Luger caliber semi-automatic Glock 19X pistol (Serial #BWGX874), one .40 Smith & Wesson caliber semi-automatic Glock 22 pistol (Serial #VGH159), one .40 Smith & Wesson caliber semi-automatic SW40V (Serial #PAN9617) and one 7.62 x 39mm caliber semi-automatic Century Arms C39 pistol (Serial #39WM-002204).

COUNT 126

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the

crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess five or more firearms, to wit: one 9mm Luger caliber semi-automatic Glock 17 pistol (Serial #NV504 US), one 9mm Luger caliber semi-automatic Glock 17 Gen 5 pistol (Serial #BZMV374), one 9mm Luger caliber semi-automatic Glock 19X pistol (Serial #BWGX874), one .40 Smith & Wesson caliber semi-automatic Glock 22 pistol (Serial #VGH159), one .40 Smith & Wesson caliber semi-automatic SW40V (Serial #PAN9617) and one 7.62 x 39mm caliber semi-automatic Century Arms C39 pistol (Serial #39WM-002204).

COUNT 127

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess three or more firearms, to wit: one 9mm Luger caliber semi-automatic Glock 17 pistol (Serial #NV504 US), one 9mm

Luger caliber semi-automatic Glock 17 Gen 5 pistol (Serial #BZMV374), one 9mm Luger caliber semi-automatic Glock 19X pistol (Serial #BWGX874), one .40 Smith & Wesson caliber semi-automatic Glock 22 pistol (Serial #VGH159), one .40 Smith & Wesson caliber semi-automatic SW40V (Serial #PAN9617) and one 7.62 x 39mm caliber semi-automatic Century Arms C39 pistol (Serial #39WM-002204).

COUNT 128

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 17 pistol (Serial #NV504 US).

COUNT 129

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA,

JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 17-round magazine (NYPD Invoice No. 1001757941, Invoice Item 2, Lab Item 144).

COUNT 130

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber semi-automatic Glock 17 pistol (Serial #NV504 US) and such possession took place outside the defendant's home or place of business.

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

COUNT 131

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

Said defendant, on or about March 7, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 17 pistol (Serial #NV504 US).

COUNT 132

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a large capacity ammunition feeding

device, to wit: one 17-round magazine (NYPD Invoice No. 1001757941, Invoice Item 2, Lab Item 144).

COUNT 133

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 17 pistol (Serial #NV504 US).

COUNT 134

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, while not authorized pursuant to law to possess

a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 17 Gen 5 pistol (Serial #BZMV374).

COUNT 135

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 18-round magazine (NYPD Invoice No. 1001757959, Invoice Item 2, Lab Item 140).

COUNT 136

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND

DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber semi-automatic Glock 17 Gen 5 pistol (Serial #BZMV374) and such possession took place outside the defendant's home or place of business.

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

COUNT 137

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

Said defendant, on or about March 7, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 17 Gen 5 pistol (Serial #BZMV374).

COUNT 138

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the

crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 18-round magazine (NYPD Invoice No. 1001757959, Invoice Item 2, Lab Item 140).

COUNT 139

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 17 Gen 5 pistol (Serial #BZMV374).

COUNT 140

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the

crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19X pistol (Serial #BWGX874).

COUNT 141

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 18-round magazine (NYPD Invoice No. 1001757959, Invoice Item 4, Lab Item 142).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19X pistol (Serial #BWGX874) and such possession took place outside the defendant's home or place of business.

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

COUNT 143

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

Said defendant, on or about March 7, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19X pistol (Serial #BWGX874).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 18-round magazine (NYPD Invoice No. 1001757959, Invoice Item 4, Lab Item 142).

COUNT 145

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19X pistol (Serial #BWGX874).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 22 pistol (Serial #VGH159).

COUNT 147

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, while not authorized pursuant to law to possess

a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 15-round magazine (NYPD Invoice No. 1001760410, Invoice Item 2, Lab Item 154).

COUNT 148

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a loaded firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 22 pistol (Serial #VGH159) and such possession took place outside the defendant's home or place of business.

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

COUNT 149

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL

POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 7, 2024, in New York County, did possess a firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 22 pistol (Serial #VGH159).

COUNT 150

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 15-round magazine (NYPD Invoice No. 1001760410, Invoice Item 2, Lab Item 154).

COUNT 151

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the

crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 22 pistol (Serial #VGH159).

COUNT 152

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .40 Smith & Wesson caliber semi-automatic SW40V (Serial #PAN9617).

COUNT 153

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA,

JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 14-round magazine (NYPD Invoice No. 1001760410, Invoice Item 4, Lab Item 156).

COUNT 154

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a loaded firearm, to wit: one .40 Smith & Wesson caliber semi-automatic SW40V (Serial #PAN9617) and such possession took place outside the defendant's home or place of business.

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

COUNT 155

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

Said defendant, on or about March 7, 2024, in New York County, did possess a firearm, to wit: one .40 Smith & Wesson caliber semi-automatic SW40V (Serial #PAN9617).

COUNT 156

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a large capacity ammunition feeding

device, to wit: one 14-round magazine (NYPD Invoice No. 1001760410, Invoice Item 4, Lab Item 156).

COUNT 157

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a firearm, to wit: one .40 Smith & Wesson caliber semi-automatic SW40V (Serial #PAN9617).

COUNT 158

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, while not authorized pursuant to law to possess

a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 7.62 x 39mm caliber semi-automatic Century Arms C39 pistol (Serial #39WM-002204).

COUNT 159

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

Said defendant, on or about March 7, 2024, in New York County, did possess a firearm, to wit: one 7.62 x 39mm caliber semi-automatic Century Arms C39 pistol (Serial #39WM-002204).

COUNT 160

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess an assault weapon, to wit: one 7.62

x 39mm caliber semi-automatic Century Arms C39 pistol (Serial #39WM-002204), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearm with the non-trigger hand without being burned.

COUNT 161

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA, JUAN MANUEL TORRES, CARLOS TORRES and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 7, 2024, in New York County, did possess a firearm, to wit: one 7.62 x 39mm caliber semi-automatic Century Arms C39 pistol (Serial #39WM-002204).

COUNT 162

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM

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

Said defendants, acting in concert with each other and others, on or about March 13, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 5.56 x 45mm caliber semi-automatic Doublestar Star-15 pistol (Serial #DS17275).

COUNT 163

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 13, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 99-round magazine (NYPD Invoice No. 1001760510, Invoice Item 2, Lab Item 159)

COUNT 164

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA** and

JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 13, 2024, in New York County, did possess a loaded firearm, to wit: one 5.56 x 45mm caliber semi-automatic Doublestar Star-15 pistol (Serial #DS17275) and such possession took place outside the defendant's home or place of business.

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

COUNT 165

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

Said defendant, on or about March 13, 2024, in New York County, did possess a firearm, to wit: one 5.56 x 45mm caliber semi-automatic Doublestar Star-15 pistol (Serial #DS17275).

COUNT 166

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and

JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 13, 2024, in New York County, did possess an assault weapon, to wit: one 5.56 x 45mm caliber semi-automatic Doublestar Star-15 pistol (Serial #DS17275), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearm with the non-trigger hand without being burned.

COUNT 167

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 13, 2024, in New York County, did possess a large capacity ammunition

feeding device, to wit: one 99-round magazine (NYPD Invoice No. 1001760510, Invoice Item 2, Lab Item 159).

COUNT 168

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 13, 2024, in New York County, did possess a firearm, to wit: one 5.56 x 45mm caliber semi-automatic Doublestar Star-15 pistol (Serial #DS17275).

COUNT 169

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE, in violation of Section 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not

more than one year, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 4 pistol (Serial #BBSD340), one 12 gauge pump-action Mossberg 590 Shockwave weapon (Serial #V1132601) and one 5.56 x 45mm caliber semi-automatic Yankee Hill Machine Co. YHM-15 rifle (Serial #YH5213).

COUNT 170

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA and JUAN MANUEL TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 4 pistol (Serial #BBSD340), one 12 gauge pump-action Mossberg 590 Shockwave weapon (Serial #V1132601) and one 5.56 x 45mm caliber semi-automatic Yankee Hill Machine Co. YHM-15 rifle (Serial #YH5213).

COUNT 171

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ, NELPHY REYES PERALTA** and

JUAN MANUEL TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York County, did possess three or more firearms, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 4 pistol (Serial #BBSD340), one 12 gauge pump-action Mossberg 590 Shockwave weapon (Serial #V1132601) and one 5.56 x 45mm caliber semi-automatic Yankee Hill Machine Co. YHM-15 rifle (Serial #YH5213).

COUNT 172

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and NELPHY REYES PERALTA, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 4 pistol (Serial #BBSD340).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and NELPHY REYES PERALTA, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 15-round magazine (NYPD Invoice No. 1001767449, Invoice Item 2, Lab Item 183).

COUNT 174

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

Said defendant, on or about March 28, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 4 pistol (Serial #BBSD340).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and NELPHY REYES PERALTA, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 15-round magazine (NYPD Invoice No. 1001767449, Invoice Item 2, Lab Item 183).

COUNT 176

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and NELPHY REYES PERALTA, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and other, on or about March 28, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 4 pistol (Serial #BBSD340).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and NELPHY REYES PERALTA, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 12-gauge pump-action Mossberg 590 Shockwave weapon (Serial #V1132601).

COUNT 178

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

Said defendant, on or about March 28, 2024, in New York County, did possess a firearm, to wit: one 12 gauge pump-action Mossberg 590 Shockwave weapon (Serial #V1132601).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and NELPHY REYES PERALTA, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 5.56 x 45mm caliber semi-automatic Yankee Hill Machine Co. YHM-15 rifle (Serial #YH5213).

COUNT 180

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and NELPHY REYES PERALTA, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large

capacity ammunition feeding device, to wit: one 40-round magazine (NYPD Invoice No. 1001767443, Invoice Item 2, Lab Item 173).

COUNT 181

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and NELPHY REYES PERALTA, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York County, did possess a loaded firearm, to wit: one 5.56 x 45mm caliber semi-automatic Yankee Hill Machine Co. YHM-15 rifle (Serial #YH5213) and such possession took place outside the defendant's home or place of business.

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

COUNT 182

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

Said defendant, on or about March 28, 2024, in New York County, did possess a firearm, to wit: one 5.56 x 45mm caliber semi-automatic Yankee Hill Machine Co. YHM-15 rifle (Serial #YH5213).

COUNT 183

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and NELPHY REYES PERALTA, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York County, did possess an assault weapon, to wit: one 5.56 x 45mm caliber semi-automatic Yankee Hill Machine Co. YHM-15 rifle (Serial #YH5213), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conscpicuously beneath the action of the weapon and a threaded barrel designed to accommodate a flash suppressor, muzzle brake or muzzle compensator.

COUNT 184

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and

NELPHY REYES PERALTA, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 40-round magazine (NYPD Invoice No. 1001767443, Invoice Item 2, Lab Item 173).

COUNT 185

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and NELPHY REYES PERALTA, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York County, did possess a firearm, to wit: one 5.56 x 45mm caliber semi-automatic Yankee Hill Machine Co. YHM-15 rifle (Serial #YH5213).

COUNT 186

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NESTOR VASQUEZ VARGAS, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL

SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 8, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 4 pistol (Serial #BESM330) and one .40 Smith & Wesson caliber semi-automatic Glock 22 Gen 4 pistol (Serial #VVY496).

COUNT 187

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NESTOR VASQUEZ VARGAS, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 8, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 4 pistol (Serial #BESM330).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NESTOR VASQUEZ VARGAS, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 8, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 24-round magazine (NYPD Invoice No. 4001092931, Invoice Item 5, Lab Item 169.

COUNT 189

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NESTOR VASQUEZ VARGAS, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 8, 2024, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 4 pistol (Serial #BESM330) and such possession took place outside the defendant's home or place of business.

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

COUNT 190

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

Said defendant, on or about April 8, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 4 pistol (Serial #BESM330).

COUNT 191

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NESTOR VASQUEZ VARGAS, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 8, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 24-round magazine (NYPD Invoice No. 4001092931, Invoice Item 5, Lab Item 169.

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NESTOR VASQUEZ VARGAS, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 8, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 4 pistol (Serial #BESM330).

COUNT 193

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NESTOR VASQUEZ VARGAS, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 8, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 22 Gen 4 pistol (Serial #VVY496).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NESTOR VASQUEZ VARGAS, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 8, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a large capacity ammunition feeding device, to wit: one 31-round magazine (NYPD Invoice No. 4001092931, Invoice Item 2, Lab Item 166).

COUNT 195

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NESTOR VASQUEZ VARGAS, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 8, 2024, in New York County, did possess a loaded firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 22 Gen 4 pistol (Serial #VVY496) and such possession took place outside the defendant's home or place of business.

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

COUNT 196

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

Said defendant, on or about April 8, 2024, in New York County, did possess a firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 22 Gen 4 pistol (Serial #VVY496).

COUNT 197

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NESTOR VASQUEZ VARGAS, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 8, 2024, in New York County, did possess a large capacity ammunition feeding device, to wit: one 31-round magazine (NYPD Invoice No. 4001092931, Invoice Item 2, Lab Item 166).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, NESTOR VASQUEZ VARGAS, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 8, 2024, in New York County, did possess a firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 22 Gen 4 pistol (Serial #VVY496).

COUNT 199

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE, in violation of Section 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 17, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber semi-automatic Glock 17 Gen 5 pistol (Serial #BHGG137), one 12 gauge pump-action Maverick Arms 88 shotgun (Serial

#MV0803923) and one .50 caliber single-action muzzleloader Thompson/Center Arms Omega rifle (Serial #S35288).

COUNT 200

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 17, 2024, in Queens County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber semi-automatic Glock 17 Gen 5 pistol (Serial #BHGG137), one 12 gauge pump-action Maverick Arms 88 shotgun (Serial #MV0803923) and one .50 caliber single-action muzzleloader Thompson/Center Arms Omega rifle (Serial #S35288).

COUNT 201

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON

IN THE THIRD DEGREE, in violation of Section 265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 17, 2024, in Queens County, did possess three or more firearms, to wit: one 9mm Luger caliber semi-automatic Glock 17 Gen 5 pistol (Serial #BHGG137), one 12 gauge pump-action Maverick Arms 88 shotgun (Serial #MV0803923) and one .50 caliber single-action muzzleloader Thompson/Center Arms Omega rifle (Serial #S35288).

COUNT 202

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ**, **JUAN MANUEL TORRES** and **CARLOS TORRES**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 17, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 17 Gen 5 pistol (Serial #BHGG137).

COUNT 203

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and

CARLOS TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 17, 2024, in Queens County, did possess a loaded firearm, to wit: one 9mm Luger caliber semi-automatic Glock 17 Gen 5 pistol (Serial #BHGG137) and such possession took place outside the defendant's home or place of business.

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

COUNT 204

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ**, **JUAN MANUEL TORRES** and **CARLOS TORRES**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 17, 2024, in Queens County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Glock 17 Gen 5 pistol (Serial #BHGG137).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ**, **JUAN MANUEL TORRES** and **CARLOS TORRES**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 17, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 12 gauge pump-action Maverick Arms 88 shotgun (Serial #MV0803923).

COUNT 206

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 17, 2024, in Queens County, did possess a loaded firearm, to wit: one 12 gauge pumpaction Maverick Arms 88 shotgun (Serial #MV0803923) and such possession took place outside the defendant's home or place of business.

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

COUNT 207

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ**, **JUAN MANUEL TORRES** and **CARLOS TORRES**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 17, 2024, in Queens County, did possess a firearm, to wit: one 12 gauge pump-action Maverick Arms 88 shotgun (Serial #MV0803923).

COUNT 208

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, JUAN MANUEL TORRES and CARLOS TORRES, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 17, 2024, in Queens County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm,

to wit: one .50 caliber single-action muzzleloader Thompson/Center Arms Omega rifle (Serial #S35288).

COUNT 209

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ**, **JUAN MANUEL TORRES** and **CARLOS TORRES**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about April 17, 2024, in Queens County, did possess a firearm, to wit: one .50 caliber single-action muzzleloader Thompson/Center Arms Omega rifle (Serial #S35288).

COUNT 210

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE, in violation of Section 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 1, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one .40 Smith & Wesson caliber full-automatic Glock 23 pistol (Serial #ESD365US), one 9mm Luger caliber semi-automatic Taurus G3C pistol (Serial #ACL490079), one .38 special caliber

single/double action Taurus 856 Ultra-Lite revolver (Serial #LS85374) and one 5.56 x 45mm/223 Remington caliber semi-automatic American Tactical Mil-Sport rifle (Serial #MSA075428).

COUNT 211

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 1, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one .40 Smith & Wesson caliber full-automatic Glock 23 pistol (Serial #ESD365US), one 9mm Luger caliber semi-automatic Taurus G3C pistol (Serial #ACL490079), one .38 special caliber single/double action Taurus 856 Ultra-Lite revolver (Serial #LS85374) and one 5.56 x 45mm/223 Remington caliber semi-automatic American Tactical Mil-Sport rifle (Serial #MSA075428).

COUNT 212

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 1, 2024, in New York County, did possess three or more firearms, to wit: one .40 Smith & Wesson caliber full-automatic Glock 23 pistol (Serial #ESD365US), one 9mm Luger caliber semi-automatic Taurus G3C pistol (Serial #ACL490079), one .38 special caliber single/double action Taurus 856 Ultra-Lite revolver (Serial #LS85374) and one 5.56 x 45mm/223 Remington caliber semi-automatic American Tactical Mil-Sport rifle (Serial #MSA075428).

COUNT 213

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

Said defendant, on or about May 1, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .40 Smith & Wesson caliber full-automatic Glock 23 pistol (Serial #ESD365US).

COUNT 214

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.02(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 1, 2024, in New York County, with intent to use the same unlawfully against another, did possess a machine-gun, to wit: one .40 Smith & Wesson caliber full-automatic Glock 23 pistol (Serial #ESD365US).

COUNT 215

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 1, 2024, in New York County, did possess a machine gun, to wit: one .40 Smith & Wesson caliber full-automatic Glock 23 pistol (Serial #ESD365US), with an attached selector switch capable of firing in full atuomatic actions.

COUNT 216

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

Said defendant, on or about May 1, 2024, in New York County, did possess a firearm, to wit: one .40 Smith & Wesson caliber full-automatic Glock 23 pistol (Serial #ESD365US).

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

Said defendant, on or about May 1, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Taurus G3C pistol (Serial #ACL490079).

COUNT 218

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 1, 2024, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber semi-automatic Taurus G3C pistol (Serial #ACL490079) and such possession took place outside the defendant's home or place of business.

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

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

Said defendant, on or about May 1, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Taurus G3C pistol (Serial #ACL490079).

COUNT 220

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

Said defendant, on or about May 1, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .38 special caliber single/double action Taurus 856 Ultra-Lite revolver (Serial #LS85374).

COUNT 221

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL

POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 1, 2024, in New York County, did possess a loaded firearm, to wit: one .38 special caliber single/double action Taurus 856 Ultra-Lite revolver (Serial #LS85374) and such possession took place outside the defendant's home or place of business.

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

COUNT 222

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

Said defendant, on or about May 1, 2024, in New York County, did possess a firearm, to wit: one .38 special caliber single/double action Taurus 856 Ultra-Lite revolver (Serial #LS85374).

COUNT 223

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ of the crime of CRIMINAL SALE

OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 1, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 5.56 x 45mm/223 Remington caliber semi-automatic American Tactical Mil-Sport rifle (Serial #MSA075428).

COUNT 224

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 1, 2024, in New York County, did possess a loaded firearm, to wit: one 5.56 x 45mm/223 Remington caliber semi-automatic American Tactical Mil-Sport rifle (Serial #MSA075428) and such possession took place outside the defendant's home or place of business.

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

COUNT 225

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL

POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 1, 2024, in New York County, did possess an assault weapon, to wit: one 5.56 x 45mm/223 Remington caliber semi-automatic American Tactical Mil-Sport rifle (Serial #MSA075428), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol girp that protrudes conspiculously beneath the action of the weapon, a second handgrip that can be held by the non-trigger hand, a threaded barrel designed to accommodate a flash suppressor, muzzle brake or muzzle compensator and a barrel length of 16 ¼ inches, an overall length of 35 5/16 inches and collapsed length of 23 1/8 inches.

COUNT 226

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

Said defendant, on or about May 1, 2024, in New York County, did possess a firearm, to wit: one 5.56 x 45mm/223 Remington caliber semi-automatic American Tactical Mil-Sport rifle (Serial #MSA075428).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE, in violation of Section 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about June 5, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber semi-automatic Lone Wolf Arms Freedom Wolf ghost gun pistol (NYPD Lead Seal #448624), one 9mm Luger caliber semi-automatic Taurus G3C pistol (Serial #ABL084038), one .40 Smith & Wesson caliber semi-automatic Glock 27 pistol (Serial #AAFH326), one .38 special caliber single/double action Smith & Wesson 10-2 revolver (Serial #C575054), one 5.56 x 45mm caliber semi-automatic American Tactical Model Milsport pistol (Serial #MSA067301) and one 5.56 x 45mm caliber semi-automatic AR-15 style defaced rifle (NYPD Lead Seal #448559).

COUNT 228

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE

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

Said defendants, acting in concert with each other and others, on or about June 5, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one 9mm Luger caliber semi-automatic Lone Wolf Arms Freedom Wolf ghost gun pistol (NYPD Lead Seal #448624), one 9mm Luger caliber semi-automatic Taurus G3c pistol (Serial #ABL084038), one .40 Smith & Wesson caliber semi-automatic Glock 27 pistol (Serial #AAFH326), one .38 special caliber single/double action Smith & Wesson 10-2 revolver (Serial #C575054), one 5.56 x 45mm caliber semi-automatic American Tactical Model Milsport pistol (Serial #MSA067301) and one 5.56 x 45mm caliber semi-automatic AR-15 style defaced rifle (NYPD Lead Seal #448559).

COUNT 229

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about June 5, 2024, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than

one year, to wit: one 9mm Luger caliber semi-automatic Lone Wolf Arms Freedom Wolf ghost gun pistol (NYPD Lead Seal #448624), one 9mm Luger caliber semi-automatic Taurus G3c pistol (Serial #ABL084038), one .40 Smith & Wesson caliber semi-automatic Glock 27 pistol (Serial #AAFH326), one .38 special caliber single/double action Smith & Wesson 10-2 revolver (Serial #C575054), one 5.56 x 45mm caliber semi-automatic American Tactical Model Milsport pistol (Serial #MSA067301) and one 5.56 x 45mm caliber semi-automatic AR-15 style defaced rifle (NYPD Lead Seal #448559).

COUNT 230

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about June 5, 2024, in New York County, did possess five or more firearms, to wit: one 9mm Luger caliber semi-automatic Lone Wolf Arms Freedom Wolf ghost gun pistol (NYPD Lead Seal #448624), one 9mm Luger caliber semi-automatic Taurus G3c pistol (Serial #ABL084038), one .40 Smith & Wesson caliber semi-automatic Glock 27 pistol (Serial #AAFH326), one .38 special caliber single/double action Smith & Wesson 10-2 revolver (Serial #C575054), one 5.56 x 45mm caliber semi-automatic American

Tactical Model Milsport pistol (Serial #MSA067301) and one 5.56 x 45mm caliber semi-automatic AR-15 style defaced rifle (NYPD Lead Seal #448559).

COUNT 231

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about June 5, 2024, in New York County, did possess three or more firearms, to wit: one 9mm Luger caliber semi-automatic Lone Wolf Arms Freedom Wolf ghost gun pistol (NYPD Lead Seal #448624), one 9mm Luger caliber semi-automatic Taurus G3c pistol (Serial #ABL084038), one .40 Smith & Wesson caliber semi-automatic Glock 27 pistol (Serial #AAFH326), one .38 special caliber single/double action Smith & Wesson 10-2 revolver (Serial #C575054), one 5.56 x 45mm caliber semi-automatic American Tactical Model Milsport pistol (Serial #MSA067301) and one 5.56 x 45mm caliber semi-automatic AR-15 style defaced rifle (NYPD Lead Seal #448559).

COUNT 232

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA

RODRIGUEZ, of the crime of CRIMINAL SALE OF A GHOST GUN IN THE SECOND DEGREE, in violation of Section 265.60(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about June 5, 2024, in New York County, knowing or having reason to know it is a ghost gun, did sell, exchange, give or dispose of to another person, a ghost gun, to wit: one 9mm Luger caliber semi-automatic Lone Wolf Arms Freedom Wolf ghost gun pistol (NYPD Lead Seal #448624).

COUNT 233

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about June 5, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Lone Wolf Arms Freedom Wolf ghost gun pistol (NYPD Lead Seal #448624).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others,, on or about June 5, 2024, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber semi-automatic Lone Wolf Arms Freedom Wolf ghost gun pistol (NYPD Lead Seal #448624) and such possession took place outside the defendant's home or place of business.

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

COUNT 235

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about June 5, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber

semi-automatic Lone Wolf Arms Freedom Wolf ghost gun pistol (NYPD Lead Seal #448624).

COUNT 236

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Taurus G3C pistol (Serial #ABL084038).

COUNT 237

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, did possess a loaded firearm, to wit: one 9mm

Luger caliber semi-automatic Taurus G3C pistol (Serial #ABL084038) and such possession took place outside the defendant's home or place of business.

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

COUNT 238

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ**, **YADIRA VASQUEZ** and **KIARA RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Taurus G3C pistol (Serial #ABL084038).

COUNT 239

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 40 Smith & Wesson caliber semi-automatic Glock 27 (Serial #AAFH326).

COUNT 240

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, did possess a loaded firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 27 (Serial #AAFH326) and such possession took place outside the defendant's home or place of business.

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

COUNT 241

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL POSSESSION OF A FIREARM, in

violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, did possess a firearm, to wit: one 40 Smith & Wesson caliber semi-automatic Glock 27 (Serial #AAFH326).

COUNT 242

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .38 special caliber single/double action Smith & Wesson 10-2 revolver (Serial #C575054).

COUNT 243

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE

SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, did possess a loaded firearm, to wit: one .38 special caliber single/double action Smith & Wesson 10-2 revolver (Serial #C575054) and such possession took place outside the defendant's home or place of business.

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

COUNT 244

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ**, **YADIRA VASQUEZ** and **KIARA RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, did possess a firearm, to wit: one .38 special caliber single/double action Smith & Wesson 10-2 revolver (Serial #C575054).

COUNT 245

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA

RODRIGUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 5.56 x 45mm caliber semi-automatic American Tactical Model Milsport pistol (Serial #MSA067301).

COUNT 246

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, did possess a loaded firearm, to wit: one 5.56 x 45mm caliber semi-automatic American Tactical Model Milsport pistol (Serial #MSA067301) and such possession took place outside the defendant's home or place of business.

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

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ**, **YADIRA VASQUEZ** and **KIARA RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, did possess an assault weapon, to wit: one 5.56 x 45mm caliber semi-automatic American Tactical Model Milsport pistol (Serial #MSA067301), which had the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, a protruding grip that can be held by the non-trigger hand, a capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash supressor, forward handgrip, or silencer and a shroud that is attached to, or partially or completely encircles the barrel and that permits the shooter to hold the firearm with the non-trigger hand without being burned.

COUNT 248

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL POSSESSION OF A FIREARM, in

violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, did possess a firearm, to wit: one 5.56 x 45mm caliber semi-automatic American Tactical Model Milsport pistol (Serial #MSA067301).

COUNT 249

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one defaced 5.56 x 45mm caliber semi-automatic AR-15 style rifle (NYPD Lead Seal #448559).

COUNT 250

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA

RODRIGUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, did possess a loaded firearm, to wit: one defaced 5.56 x 45mm caliber semi-automatic AR-15 style rifle (NYPD Lead Seal #448559) and such possession took place outside the defendant's home or place of business.

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

COUNT 251

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, did possess firearm, to wit: one defaced 5.56 x 45mm caliber semi-automatic AR-15 style rifle (NYPD Lead Seal #448559), which had been defaced for the purpose of concealment or prevention of the detection of a crime or misrepresenting the identify of such.

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ**, **YADIRA VASQUEZ** and **KIARA RODRIGUEZ**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, did possess an assault weapon, to wit: one defaced 5.56 x 45mm caliber semi-automatic AR-15 style rifle (NYPD Lead Seal #448559), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protrudes conspiculously beneath the action of the weapon, a second handgrip that can be held by the non-trigger hand, a flash suppressor, muzzle break, muzzle compensator or threaded barrel designed to accommodate a flash supressor, muzzle brake or muzzle compensator and has a barrel length of 17 ½ inches, an overal length of 35 5/8 inches and collapsed length of 32 3/8 inches.

COUNT 253

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ, YADIRA VASQUEZ and KIARA RODRIGUEZ, of the crime of CRIMINAL POSSESSION OF A FIREARM, in

violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, with each other and others, on or about June 5, 2024, in New York County, did possess a firearm, to wit: one defaced 5.56 x 45mm caliber semi-automatic AR-15 style rifle (NYPD Lead Seal #448559).

COUNT 254

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, **ANTHONY ORTIZ VASQUEZ**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE**, in violation of Section 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 22, 2023, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one .40 caliber Glock 23 pistol (Serial # MHW824), one .45 caliber Glock 30S pistol (Serial # BYAP622), one .45 caliber Glock 30S pistol (Serial # BSUD192) and one .357 caliber Glock 31 pistol (Serial # BLUX696).

COUNT 255

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL SALE

OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 22, 2023, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one .40 caliber Glock 23 pistol (Serial # MHW824), one .45 caliber Glock 30S pistol (Serial # BYAP622), one .45 caliber Glock 30S pistol (Serial # BSUD192) and one .357 caliber Glock 31 pistol (Serial # BLUX696).

COUNT 256

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

Said defendant, on or about August 22, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .40 caliber Glock 23 pistol (Serial # MHW824).

COUNT 257

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL

POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 22, 2023, in New York County, did possess a loaded firearm, to wit: one .40 caliber Glock 23 pistol (Serial # MHW824) and such possession took place outside the defendant's home or place of business.

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

COUNT 258

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

Said defendant, on or about August 22, 2023, in New York County, did possess a firearm, to wit: one .40 caliber Glock 23 pistol (Serial # MHW824).

COUNT 259

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

Said defendant, on or about August 22, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .45 caliber Glock 30S pistol (Serial # BYAP622).

COUNT 260

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 22, 2023, in New York County, did possess a loaded firearm, to wit: one .45 caliber Glock 30S pistol (Serial # BYAP622) and such possession took place outside the defendant's home or place of business.

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

COUNT 261

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

Said defendant, on or about August 22, 2023, in New York County, did possess a firearm, to wit: one .45 caliber Glock 30S pistol (Serial # BYAP622).

COUNT 262

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

Said defendant, on or about August 22, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .45 caliber Glock 30S pistol (Serial # BSUD192).

COUNT 263

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 22, 2023, in New York County, did possess a loaded firearm, to wit: one .45 caliber Glock 30S pistol (Serial # BSUD192) and such possession took place outside the defendant's home or place of business.

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

COUNT 264

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

Said defendant, on or about August 22, 2023, in New York County, did possess a firearm, to wit: one .45 caliber Glock 30S pistol (Serial # BSUD192).

COUNT 265

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

Said defendant, on or about August 22, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .357 caliber Glock 31 pistol (Serial # BLUX696).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE, in violation of Section 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 24, 2023, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one 9 mm Luger caliber Taurus THC9c pistol (Serial #ADB995168), one .40 Smith & Wesson caliber Taurus TH40c pistol (Serial #AEC240007), one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D009920), one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D010018) and one 7.62 x 39mm caliber Romarm/Cugir Micro Draco semi-automatic pistol (Serial #ROA 23 PMD-40936).

COUNT 267

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 24, 2023, in New York County, did unlawfully sell, exchange, give or dispose of to another five or more firearms, to wit: one 9mm luger caliber Taurus THC9c pistol (Serial #ADB995168), one .40 Smith &

Wesson caliber Taurus TH40c pistol (Serial #AEC240007), one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D009920), one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D010018) and one 7.62 x 39mm caliber Romarm/Cugir Micro Draco semi-automatic pistol (Serial #ROA 23 PMD-40936).

COUNT 268

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, **ANTHONY ORTIZ VASQUEZ**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE**, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 24, 2023, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber Taurus THC9c pistol (Serial #ADB995168), one .40 Smith & Wesson caliber Taurus TH40c pistol (Serial #AEC240007), one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D009920), one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D010018) and one 7.62 x 39mm caliber Romarm/Cugir Micro Draco semi-automatic pistol (Serial #ROA 23 PMD-40936).

COUNT 269

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL

POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 24, 2023, in New York County, did possess five or more firearms, to wit: one 9mm Luger caliber Taurus THC9c pistol (Serial #ADB995168), one .40 Smith & Wesson caliber Taurus TH40c pistol (Serial #AEC240007), one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D009920), one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D010018) and one 7.62 x 39mm caliber Romarm/Cugir Micro Draco semi-automatic pistol (Serial #ROA 23 PMD-40936).

COUNT 270

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, **ANTHONY ORTIZ VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 24, 2023, in New York County, did possess three or more firearms, to wit: one 9mm Luger caliber Taurus THC9c pistol (Serial #ADB995168), one .40 Smith & Wesson caliber Taurus TH40c pistol (Serial #AEC240007), one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D009920), one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D010018) and one 7.62 x 39mm caliber Romarm/Cugir Micro Draco semi-automatic pistol (Serial #ROA 23 PMD-40936).

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

Said defendant, on or about August 24, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm luger caliber Taurus THC9c pistol (Serial #ADB995168).

COUNT 272

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 24, 2023, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber Taurus THC9c pistol (Serial #ADB995168) and such possession took place outside the defendant's home or place of business.

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

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

Said defendant, on or about August 24, 2023, in New York County, did possess a firearm, to wit: one 9mm Luger caliber Taurus THC9c pistol (Serial #ADB995168).

COUNT 274

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

Said defendant, on or about August 24, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .40 Smith & Wesson caliber Taurus TH40c pistol (Serial #AEC240007).

COUNT 275

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL

POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 24, 2023, in New York County, did possess a loaded firearm, to wit: one .40 Smith & Wesson caliber Taurus TH40c pistol (Serial #AEC240007) and such possession took place outside the defendant's home or place of business.

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

COUNT 276

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

Said defendant, on or about August 24, 2023, in New York County, did possess a firearm, to wit: one .40 Smith & Wesson caliber Taurus TH40c pistol (Serial #AEC240007).

COUNT 277

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

Said defendant, on or about August 24, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D009920).

COUNT 278

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 24, 2023, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D009920) and such possession took place outside the defendant's home or place of business.

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

COUNT 279

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

Said defendant, on or about August 24, 2023, in New York County, did possess a firearm, to wit: one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D009920).

COUNT 280

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

Said defendant, on or about August 24, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D010018).

COUNT 281

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 24, 2023, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D010018) and such possession took place outside the defendant's home or place of business.

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

COUNT 282

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

Said defendant, on or about August 24, 2023, in New York County, did possess a firearm, to wit: one 9mm Luger caliber SCCY DVG-1 pistol (Serial #D010018).

COUNT 283

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

Said defendant, on or about August 24, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 7.62 x 39mm caliber Romarm/Cugir Micro Draco semi-automatic pistol (Serial #ROA 23 PMD-40936).

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 24, 2023, in New York County, did possess a loaded firearm, to wit: one 7.62 x 39mm caliber Romarm/Cugir Micro Draco semi-automatic pistol (Serial #ROA 23 PMD-40936) and such possession took place outside the defendant's home or place of business.

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

COUNT 285

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

Said defendant, on or about August 24, 2023, in New York County, did possess an assault weapon, to wit: one 7.62 x 39mm caliber Romarm/Cugir Micro Draco semi-automatic pistol (Serial #ROA 23 PMD-40936), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a second handgrip that can be held by the non-trigger hand,

the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip and a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer.

COUNT 286

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

Said defendant, on or about August 24, 2023, in New York County, did possess a firearm, to wit: 7.62 x 39mm caliber Romarm/Cugir Micro Draco semi-automatic pistol (Serial #ROA 23 PMD-40936).

COUNT 287

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, **ANTHONY ORTIZ VASQUEZ**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE**, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about October 3, 2023, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 9mm luger

caliber semi-automatic/full automatic Glock 19x (Serial #ADLS231) and one .38 special caliber single/double action Taurus 85UL Revolver (Serial #KP39439).

COUNT 288

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

Said defendant, on or about October 3, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm luger caliber semi-automatic/full automatic Glock 19x (Serial #ADLS231).

COUNT 289

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about October 3, 2023, in New York County, did possess a loaded firearm, to wit: one 9mm luger caliber semi-automatic/full automatic Glock 19x (Serial #ADLS231) and such possession took place outside the defendant's home or place of business.

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

COUNT 290

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, **ANTHONY ORTIZ VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about October 3, 2023, in New York County, with intent to use the same unlawfully against another, did possess a machine-gun, to wit: one 9mm luger caliber semi-automatic/full automatic Glock 19x (Serial #ADLS231) with an attached selector switch capable of firing in semi-automatic and full automatic actions.

COUNT 291

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

Said defendant, on or about October 3, 2023, in New York County, did possess a firearm, to wit: one 9mm luger caliber semi-automatic/full automatic Glock 19x (Serial #ADLS231).

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

Said defendant, on or about October 3, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 38 special caliber single/double action Taurus 85UL Revolver (Serial #KP39439).

COUNT 293

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

Said defendant, on or about October 3, 2023, in New York County, did possess a firearm, to wit: one 38 special caliber single/double action Taurus 85UL Revolver (Serial #KP39439).

COUNT 294

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and HECTOR VASQUEZ, of the

crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about October 23, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 300 Blackout caliber semi-automatic Palmetto State Armory PA-15 pistol (Serial # SCD561270).

COUNT 295

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **HECTOR VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about October 23, 2023, in New York County, did possess a loaded firearm, to wit: one 300 Blackout caliber semi-automatic Palmetto State Armory PA-15 pistol (Serial # SCD561270) and such possession took place outside the defendant's home or place of business.

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

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **HECTOR VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about October 23, 2023, in New York County, did possess an assault weapon, to wit: one 300 Blackout caliber semi-automatic Palmetto State Armory PA-15 pistol (Serial # SCD561270), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip and a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer and a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to hold the firearm with the non-trigger hand without being burned.

COUNT 297

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **HECTOR VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about October 23, 2023, in New York County, did possess a firearm, to wit: one 300 Blackout caliber semi-automatic Palmetto State Armory PA-15 pistol (Serial # SCD561270).

COUNT 298

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about October 23, 2023, in New York County, did unlawfully sell, exchange, give or dispose of, to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 7.62 x 39mm caliber semi-automatic Romarm/Cugir WASR-10/63 rifle (Serial # AC-3305-81) and one 5.56 x 45 mm caliber semi-automatic Smith & Wesson M&P 15 rifle (Serial # SX18967).

COUNT 299

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE**, in violation of Section 265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about October 23, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give

or dispose of to another person a firearm, to wit: one 7.62 x 39mm caliber semiautomatic Romarm/Cugir WASR-10/63 rifle (Serial # AC-3305-81).

COUNT 300

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about October 23, 2023, in New York County, did possess a loaded firearm, to wit: one 7.62 x 39mm caliber semi-automatic Romarm/Cugir WASR-10/63 rifle (Serial # AC-3305-81) and such possession took place outside the defendant's home or place of business.

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

COUNT 301

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

Said defendant, on or about October 23, 2023, in New York County, did possess an assault weapon, to wit: one 7.62 x 39mm caliber semi-automatic Romarm/Cugir

WASR-10/63 rifle (Serial # AC-3305-81), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a pistol grip that protudes conspiculously beneath the action of the weapon, a second handgrip grip that can be held by the non-trigger hand, threaded barrel designed to accommodate a flash supressor, muzzle break or muzzle compensator and a barrel length of 16 3/8 inches and an overall length of 34 3/8 inches.

COUNT 302

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

Said defendant, on or about October 23, 2023, in New York County, did possess a firearm, to wit: one 7.62 x 39mm caliber semi-automatic Romarm/Cugir WASR-10/63 rifle (Serial # AC-3305-81).

COUNT 303

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

Said defendant, on or about October 23, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 5.56 x 45 mm caliber semi-automatic Smith & Wesson M&P 15 rifle (Serial # SX18967).

COUNT 304

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

Said defendant, on or about October 23, 2023, in New York County, did possess an assault weapon, to wit: one 5.56 x 45 mm caliber semi-automatic Smith & Wesson M&P 15 rifle (Serial # SX18967), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protudes conspiculously beneath the action of the weapon, a second handgrip that can be held by the non-trigger hand and a bayonet mount, a flash supressor, muzzle brake, muzzle compensator, or threaded barrel designed to accommodate a flash suppressor, muzzle brake or muzzle compensator.

COUNT 305

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL

POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about October 23, 2023, in New York County, did possess a firearm, to wit: one 5.56 x 45 mm caliber semi-automatic Smith & Wesson M&P 15 rifle (Serial # SX18967).

COUNT 306

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about November 15, 2023, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 5.56 x 45 mm/223 Remington caliber semi-automatic Aero Precision X15 rifle (Serial # 345869) and one 5.56 x 45mm/223 Remington caliber semi-automatic Delton Inc. DTI-15 pistol (Serial # B-23108).

COUNT 307

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

Said defendant, on or about November 15, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 5.56 x 45 mm/223 Remington caliber semi-automatic Aero Precision X15 rifle (Serial # 345869).

COUNT 308

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about November 15, 2023, in New York County, did possess a loaded firearm, to wit: one 5.56 x 45 mm/223 Remington caliber semi-automatic Aero Precision X15 rifle (Serial # 345869) and such possession took place outside the defendant's home or place of business.

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

COUNT 309

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

Said defendant, on or about November 15, 2023, in New York County, did possess an assault weapon, to wit: one 5.56 x 45 mm/223 Remington caliber semi-automatic Aero Precision X15 rifle (Serial # 345869), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a telescoping stock, a pistol grip that protudes conspiculously beneath the action of the weapon, a second handgrip that can be held by the non-trigger hand, a bayonet mount, a flash supressor, muzzle brake, muzzle compensator, or threaded barrel designed to accommodate a flash suppressor, muzzle brake or muzzle compensator and a barrel length of 17 3/8 inches, an overall length of 36 inches and a collapsed length of 32 ¾ inches.

COUNT 310

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about November 15, 2023, in New York County, did possess a firearm, to wit: one: one 5.56 x 45 mm/223 Remington caliber semi-automatic Aero Precision X15 rifle (Serial # 345869).

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

Said defendant, on or about November 15, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 5.56 x 45mm/223 Remington caliber semi-automatic Delton Inc. DTI-15 pistol (Serial # B-23108).

COUNT 312

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about November 15, 2023, in New York County, did possess a loaded firearm, to wit: one 5.56 x 45mm/223 Remington caliber semi-automatic Delton Inc. DTI-15 pistol (Serial # B-23108) and such possession took place outside the defendant's home or place of business.

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

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

Said defendant, on or about November 15, 2023, in New York County, did possess an assault weapon, to wit: one 5.56 x 45mm/223 Remington caliber semi-automatic Delton Inc. DTI-15 pistol (Serial # B-23108), which had the following assault weapon characteristics: a semi-automatic rifle that has an ability to accept a detachable magazine, a capacity to accept ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppresor, forward handgrip, or silencer and a shroud that is attached to, or partially or completely encircles the barrel and that permits the shooter to hold the firearm with the non-trigger hand without being burned.

COUNT 314

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

Said defendant, on or about November 15, 2023, in New York County, did possess a firearm, to wit: one 5.56 x 45mm/223 Remington caliber semi-automatic Delton Inc. DTI-15 pistol (Serial # B-23108).

COUNT 315

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about November 28, 2023, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 23 pistol (Serial #BVCY509) and one .38 special caliber single/double action Charter Arms Undercover Lite revolver (Serial #22L31332).

COUNT 316

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

Said defendant, on or about November 28, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange,

give or dispose of to another person a firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 23 pistol (Serial #BVCY509).

COUNT 317

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, acting in concert with each other and others, on or about November 28, 2023, in New York County, did possess a loaded firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 23 pistol (Serial #BVCY509) and such possession took place outside the defendant's home or place of business.

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

COUNT 318

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

Said defendants, acting in concert with each other and others, on or about November 28, 2023, in New York County, did possess a firearm, to wit: one .40 Smith & Wesson caliber semi-automatic Glock 23 pistol (Serial #BVCY509).

COUNT 319

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

Said defendant, on or about November 28, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one .38 special caliber single/double action Charter Arms Undercover Lite revolver (Serial #22L31332).

COUNT 320

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about November 28, 2023, in New York County, did possess a loaded firearm, to wit: one .38 special caliber single/double action Charter

Arms Undercover Lite revolver (Serial #22L31332) and such possession took place outside the defendant's home or place of business.

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

COUNT 321

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

Said defendant, on or about November 28, 2023, in New York County, did possess a firearm, to wit: one .38 special caliber single/double action Charter Arms Undercover Lite revolver (Serial #22L31332).

COUNT 322

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, **ANTHONY ORTIZ VASQUEZ**, of the crime of **CRIMINAL SALE OF A FIREARM IN THE FIRST DEGREE**, in violation of Section 265.13(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about December 13, 2023, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of three or more firearms in a period of not more than one year, to wit: one 9mm Luger

caliber semi-automatic Ruger PC Charger pistol (Serial #913-29691), one 9mm Luger caliber semi-automatic Beretta BU9 Nano pistol (Serial #NU027315) and one 9mm Luger caliber semi-automatic Polymer80 Inc. PF940C ghost gun pistol (NYPD Lead Seal #366414).

COUNT 323

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL SALE OF A FIREARM IN THE SECOND DEGREE, in violation of Section 265.12(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about December 13, 2023, in New York County, did unlawfully sell, exchange, give or dispose of to another person or persons a total of two or more firearms in a period of not more than one year, to wit: one 9mm Luger caliber semi-automatic Ruger PC Charger pistol (Serial #913-29691), one 9mm Luger caliber semi-automatic Beretta BU9 Nano pistol (Serial #NU027315) and one 9mm Luger caliber semi-automatic Polymer80 Inc. PF940C ghost gun pistol (NYPD Lead Seal #366414).

COUNT 324

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL

POSSESSION OF A WEAPON IN THE THIRD DEGREE, in violation of Section 265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about December 13, 2023, in New York County, did possess three or more firearms, to wit: one 9mm Luger caliber semi-automatic Ruger PC Charger pistol (Serial #913-29691), one 9mm Luger caliber semi-automatic Beretta BU9 Nano pistol (Serial #NU027315) and one 9mm Luger caliber semi-automatic Polymer80 Inc. PF940C ghost gun pistol (NYPD Lead Seal #366414).

COUNT 325

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

Said defendant, on or about December 13, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Ruger PC Charger pistol (Serial #913-29691).

COUNT 326

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL

POSSESSION OF A WEAPON IN THE SECOND DEGREE, in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about December 13, 2023, in New York County, did possess a loaded firearm, to wit: one 9mm Luger caliber semi-automatic Ruger PC Charger pistol (Serial #913-29691) and such possession took place outside the defendant's home or place of business.

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

COUNT 327

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

Said defendant, on or about December 13, 2023, in New York County, did possess an assault weapon, to wit: one 9mm Luger caliber semi-automatic Ruger PC Charger pistol (Serial #913-29691), which had the following assault weapon characteristics: a semi-automatic pistol that has an ability to accept a detachable magazine, the capacity to accept an ammunition magazine that attaches to the pistol outside of the pistol grip, a threaded barrel capable of accepting a barrel extender, flash suppressor, forward handgrip or silencer and a shroud that is attached to, or

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

COUNT 328

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

Said defendant, on or about December 13, 2023, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Ruger PC Charger pistol (Serial #913-29691).

COUNT 329

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

Said defendant, on or about December 13, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Beretta BU9 Nano pistol (Serial #NU027315).

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

Said defendant, on or about December 13, 2023, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Beretta BU9 Nano pistol (Serial #NU027315).

COUNT 331

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

Said defendant, on or about December 13, 2023, in New York County, while not authorized pursuant to law to possess a firearm, did unlawfully sell, exchange, give or dispose of to another person a firearm, to wit: one 9mm Luger caliber semi-automatic Polymer 80 Inc. PF940C ghost gun pistol (NYPD Lead Seal #366414).

COUNT 332

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, of the crime of CRIMINAL

POSSESSION OF A FIREARM, in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about December 13, 2023, in New York County, did possess a firearm, to wit: one 9mm Luger caliber semi-automatic Polymer80 Inc. PF940C ghost gun pistol (NYPD Lead Seal #366414).

COUNT 333

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **HECTOR VASQUEZ**, 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 September 19, 2023, and March 28, 2024, in New York County, New York and the State of New Jersey, with intent that conduct constituting 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, said crime being a class A felony, be committed, the defendants, acting in concert with each other and others, 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 of the above-mentioned class A felony.

PREAMBLE

It was the purpose of this conspiracy to acquire, possess, and sell cocaine in New York County, New York and the State of New Jersey. It was the role of **HECTOR VASQUEZ** to supply cocaine to **ANTHONY ORTIZ VASQUEZ** for resale in New York County to an individual whose identity is known to the Grand Jury.

It was the role of **ANTHONY ORTIZ VASQUEZ** to resell cocaine to individuals whose identities are known to the Grand Jury in New York County, New York.

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

OVERT ACTS

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

- 1. On September 19, 2023, **ANTHONY ORTIZ VASQUEZ** sold 100 grams of cocaine to an individual known to the Grand Jury in New York County.
- 2. On October 23, 2023, **HECTOR VASQUEZ** drove **ANTHONY ORTIZ VASQUEZ** to New York County to sell 100 grams of cocaine to an individual known to the Grand Jury.
- 3. On February 2, 2024, **HECTOR VASQUEZ** drove **ANTHONY ORTIZ VASQUEZ** to New York County to sell 100 grams of cocaine to an individual known to the Grand Jury.

- 4. On February 6, 2024, ANTHONY ORTIZ VASQUEZ engaged in a phone conversation with HECTOR VASQUEZ, in which ANTHONY ORTIZ VASQUEZ stated, in sum and substance, "Gordo, he called me saying that yes he does need the 100 from the white thing by tomorrow" to which HECTOR VASQUEZ replied, in sum and substance, "At the same time, at 3:00?.... Alright baby, alright, I can give you some".
- 5. On March 27, 2024, ANTHONY ORTIZ VASQUEZ engaged in a phone conversation with HECTOR VASQUEZ, in which ANTHONY ORTIZ VASQUEZ stated, in sum and substance, "Is there 100 grams left?" to which HECTOR VASQUEZ replied, in sum and substance, "I could get some for you, as well".

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, 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 19, 2023, in New York 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.

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, 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 19, 2023, in New York 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 336

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, **ANTHONY ORTIZ VASQUEZ**, 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 19, 2023, in New York County, did knowingly and unlawfully possess a narcotic drug; to wit: cocaine, with intent to sell it.

COUNT 337

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, ANTHONY ORTIZ VASQUEZ, 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 19, 2023, in New York 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 338

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about October 23, 2023, in New York 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.

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about October 23, 2023, in New York 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 340

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **HECTOR VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about October 23, 2023, in New York County, did knowingly and unlawfully possess a narcotic drug; to wit: cocaine, with intent to sell it.

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **HECTOR VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about October 23, 2023, in New York 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 342

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **HECTOR VASQUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 2, 2024, in New York 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 343

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 2, 2024, in New York 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 344

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 2, 2024, in New York County, did knowingly and unlawfully possess a narcotic drug; to wit: cocaine, with intent to sell it.

COUNT 345

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **HECTOR VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 2, 2024, in New York 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 346

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

Said defendant, on or about February 2, 2024, in New York County, did possess an unloaded firearm, to wit: one 12 gauge pump action Benelli Nova Pump Action cut-down shotgun (Serial #Z567311L) and also committed a drug trafficking felony, to wit: 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, as charged in Count 342 of this Indictment.

COUNT 347

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **HECTOR VASQUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 7, 2024, in New York 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 348

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE

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

Said defendants, acting in concert with each other and others, on or about February 7, 2024, in New York 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 349

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **HECTOR VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 7, 2024, in New York County, did knowingly and unlawfully possess a narcotic drug; to wit: cocaine, with intent to sell it.

COUNT 350

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE

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

Said defendants, acting in concert with each other and others, on or about February 7, 2024, in New York 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 351

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendant, **ANTHONY ORTIZ VASQUEZ** and **HECTOR VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Section 265.02(9) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about February 7, 2024, in New York County, did possess an unloaded firearm, to wit: one 9mm Luger caliber semi-automatic Hi-Point C9 pistol (Serial #P1055308) and also committed a drug trafficking felony, to wit: 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, as charged in Count 347 of this Indictment.

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

Said defendant, on or about February 7, 2024, in New York County, did possess an unloaded firearm, to wit: one 9mm Luger caliber semi-automatic Ruger P95 pistol (Serial #316-47178) and also committed a drug trafficking felony, to wit: 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, as charged in Count 347 of this Indictment.

COUNT 353

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **HECTOR VASQUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York 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.

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and HECTOR VASQUEZ, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York 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 355

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, ANTHONY ORTIZ VASQUEZ and HECTOR VASQUEZ, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York County, did knowingly and unlawfully possess a narcotic drug; to wit: cocaine, with intent to sell it.

THE GRAND JURY OF NEW YORK COUNTY, by this Indictment, accuses the defendants, **ANTHONY ORTIZ VASQUEZ** and **HECTOR VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert with each other and others, on or about March 28, 2024, in New York 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 357

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

Said defendant, on or about March 28, 2024, in New York County, did possess an unloaded firearm, to wit: one 9mm Luger caliber semi-automatic Glock 19 Gen 4 pistol (Serial #BBSD340) and also committed a drug trafficking felony, to wit: 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, as charged in Count 353 of this Indictment.

COUNT 358

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

Said defendant, on or about March 28, 2024, in New York County, did possess

an unloaded firearm, to wit: one 12 gauge pump-action Mossberg 590 Shockwave

weapon (Serial #V1132601) and also committed a drug trafficking felony, to wit:

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, as charged in Count 353 of this

Indictment.

Dated:

July 12, 2024

New York County, New York

NICOLE KEARY

Deputy Attorney General

Organized Crime Task Force

By: ____

BRANDI S. KLIGMAN

Assistant Deputy Attorney General

Organized Crime Task Force

A TRUE BILL

GRAND JURY FOREPERSON

Dated: July 12, 2024

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