

STATE OF NEW YORK
COUNTY OF WAYNE

COUNTY COURT

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THE PEOPLE OF THE STATE OF NEW YORK

-against-

TRESHON ALEXANDER, a/k/a “Tre”
TYRONE BERRY
ALEXIS BROIDA, a/k/a “Lexi”
DERRICK BROWN
JAMES BUTLER
MICHAEL DANZEY
JACQUINN EDWARDS
RYAN FANIEL
ROMARIS GLANTON
JEANETTE GONZALEZ
JAY QUANNA ARRIMINTHA GREEN
KARMALUS HERRINGTON
CHRISTOPHER JOHNSTON
ALICA LANNON
DANIEL LITTLES
CARLOS LUNA, a/k/a “Flaco”
CHRISTINA MARTIN
NELSON MARTINEZ
RANDOLPH MATTICE
BROOKE MINER
JAMAAL MOODY
MEGAN MURRAY
JASMINE OFRAY
ANDREA PARKER
TERRANCE RAGGS
TYQUAIL RAGGS
GENEVA RIVERA, a/k/a Geneva Brown
JACOB RIVERA, a/k/a “J”
LUIS RIVERA
LUIS EMMANUEL RIVERA, a/k/a “Manuel,” a/k/a “Manny”
NATAN RIVERA, a/k/a “Nate”
DANIEL RODRIGUEZ
JOSHUA RODRIGUEZ
XAVIER ROMAN, a/k/a “Javi”
ULYSSES SANCHEZ, a/k/a “Chichi”
WILLIAM SANCHEZ
MATTHEW SIMMONS
AMBER STREETER
AARON SWEENEY
DAVID SWEENEY
RICHARD TAFT

SEALED
INDICTMENT
Indict No. 70184-23 /(001-048)

OCTF 20-010S

NICHOLAS TANDLE
VICTORIA TANDLE
RAQUEL TORRES, a/k/a “Ma”
RAYMOND VEGA,
SCOTT WHEATON
WILLIAM WHEATON
BRANDON WILLIAMS

Defendants.

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Count One

THE GRAND JURY OF WAYNE COUNTY, by this indictment, accuses the defendants, TRESHON ALEXANDER, a/k/a “Tre,” TYRONE BERRY, ALEXIS BROIDA, a/k/a “Lexi,” DERRICK BROWN, JAMES BUTLER, MICHAEL DANZEY, JACQUINN EDWARDS, RYAN FANIEL, ROMARIS GLANTON, JEANETTE GONZALEZ, JAY QUANNA ARRIMINTHA GREEN, KARMALUS HERRINGTON, CHRISTOPHER JOHNSTON, ALICA LANNON, DANIEL LITTLES, CARLOS LUNA, a/k/a “Flaco,” CHRISTINA MARTIN, NELSON MARTINEZ, RANDOLPH MATTICE, BROOKE MINER, JAMAAL MOODY, MEGAN MURRAY, JASMINE OFRAY, ANDREA PARKER, TERRANCE RAGGS, TYQUAIL RAGGS, GENEVA RIVERA, a/k/a Geneva Brown, JACOB RIVERA, a/k/a “J,” LUIS RIVERA, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” a/k/a “Manny,” NATAN RIVERA, a/k/a “Nate,” DANIEL RODRIGUEZ, JOSHUA RODRIGUEZ, XAVIER ROMAN, a/k/a “Javi,” ULYSSES SANCHEZ, a/k/a “Chichi,” WILLIAM SANCHEZ, MATTHEW SIMMONS, AMBER STREETER, AARON SWEENEY, DAVID SWEENEY, RICHARD TAFT, NICHOLAS TANDLE, VICTORIA TANDLE, RAQUEL TORRES, a/k/a “Ma,” RAYMOND VEGA, SCOTT WHEATON, WILLIAM WHEATON and BRANDON WILLIAMS of the crime of **CONSPIRACY IN THE SECOND DEGREE**, in violation of Section 105.15 of the Penal Law of the State of New York, committed as follows:

From on or before February 4, 2021, through on or about March 23, 2023, in Wayne County, Monroe County, and Ontario County in the State of New York and elsewhere, with intent that conduct constituting the crimes of Criminal Possession of a Controlled Substance in the First Degree, and/or Criminal Possession of a Controlled Substance in the Second Degree, and/or Criminal Sale of a Controlled Substance in the Second Degree, said crimes being Class A felonies, be committed, the defendants knowingly and intentionally agreed with each other and with others, known and unknown, to engage in or cause the performance of such conduct.

PREAMBLE

It was part of this conspiracy to possess narcotics in amounts of four ounces or more and to sell narcotics in amounts of one-half ounce or more in Wayne County, Monroe County, and Ontario County, in the State of New York and elsewhere.

It was also part of this conspiracy for JACOB RIVERA, a/k/a “J,” to arrange shipments of narcotics to LUIS RIVERA, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” a/k/a “Manny,” TRESHON ALEXANDER, a/k/a “Tre,” and JAY QUANNA ARRIMINTHA GREEN.

It was also part of this conspiracy for LUIS RIVERA, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” a/k/a “Manny,” TRESHON ALEXANDER, a/k/a “Tre,” NATAN RIVERA, a/k/a “Nate,” and ULYSSES SANCHEZ, a/k/a “Chichi” to sell narcotic drugs to others.

It was also part of this conspiracy for NATAN RIVERA, a/k/a “Nate” to transport money to be used to purchase narcotic drugs.

It was also part of this conspiracy for GENEVA RIVERA, a/k/a Geneva Brown to collect and disseminate money to pay for the shipment of narcotics.

It was also part of this conspiracy for JAY QUANNA ARRIMINTHA GREEN to receive packages of narcotics.

It was also part of this conspiracy for CARLOS LUNA, a/k/a “Flaco” and DANIEL RODRIGUEZ to sell narcotic drugs to RAYMOND VEGA and others.

It was also part of this conspiracy for RAYMOND VEGA to sell narcotic drugs to RAQUEL TORRES, a/k/a “Ma,” JASMINE OFRAY, JEANETTE GONZALEZ, and others.

It was also part of this conspiracy for XAVIER ROMAN, a/k/a “Javi,” to assist RAYMOND VEGA with his narcotics sales.

It was also part of this conspiracy for JACQUINN EDWARDS, and JASMINE OFRAY to sell narcotic drugs to RAQUEL TORRES, a/k/a “Ma,” and others.

It was also part of this conspiracy for RAQUEL TORRES, a/k/a “Ma,” to sell narcotic drugs to AARON SWEENEY and others.

It was also part of this conspiracy for JEANETTE GONZALEZ to sell narcotic drugs to NELSON MARTINEZ, WILLIAM SANCHEZ and others.

It was also part of this conspiracy for NELSON MARTINEZ to sell narcotic drugs to RAQUEL TORRES, a/k/a “Ma,” and others.

It was also part of this conspiracy for WILLIAM SANCHEZ to operate a Gatehouse at 18 Lang Street, Rochester, New York, from which narcotic drugs were sold, and to sell narcotic drugs to others.

It was also part of this conspiracy for JOSHUA RODRIGUEZ to manage WILLIAM SANCHEZ’s Gatehouse at 18 Lang Street, Rochester, New York, to package narcotic drugs, and to sell narcotic drugs to others.

It was also part of this conspiracy for AARON SWEENEY to obtain narcotic drugs from RAQUEL TORRES, a/k/a “Ma,” and RYAN FANIEL to sell to others.

It was also part of this conspiracy for MEGAN MURRAY, RANDOLPH MATTICE, and DAVID SWEENEY to assist AARON SWEENEY with his narcotics sales.

It was also part of this conspiracy for RYAN FANIEL to sell narcotic drugs to KARMALUS HERRINGTON, ANDREA PARKER, AARON SWEENEY, and others.

It was also part of this conspiracy for ALICA LANNON to assist RYAN FANIEL with his narcotics sales.

It was also part of this conspiracy for TYRONE BERRY to sell narcotic drugs to KARMALUS HERRINGTON and others.

It was also part of this conspiracy for KARMALUS HERRINGTON to sell narcotic drugs to JAMES BUTLER, ANDREA PARKER, SCOTT WHEATON, WILLIAM WHEATON, and others.

It was also part of this conspiracy for AMBER STREETER to possess and sell narcotic drugs for KARMALUS HERRINGTON.

It was also part of this conspiracy for TERRANCE RAGGS to store narcotics for TERRANCE RAGGS and MICHAEL DANZEY and to work in conjunction with MICHAEL DANZEY to sell narcotic drugs to others.

It was also part of this conspiracy for TERRANCE RAGGS to sell narcotics drugs to RYAN FANIEL, TYRONE BERRY, and others.

It was also part of this conspiracy for MICHAEL DANZEY to sell narcotic drugs to ROMARIS GLANTON, DANIEL LITTLES, TYQUAIL RAGGS, MATTHEW SIMMONS, VICTORIA TANDLE, BRANDON WILLIAMS, and others.

It was also part of this conspiracy for ROMARIS GLANTON to sell narcotic drugs to DANIEL LITTLES and others.

It was also part of this conspiracy for CHRISTINA MARTIN to possess and sell narcotic drugs for ROMARIS GLANTON.

It was also part of this conspiracy for RICHARD TAFT to sell narcotic drugs to DANIEL LITTLES, VICTORIA TANDLE, and others.

It was also part of this conspiracy for MATTHEW SIMMONS to sell narcotic drugs to VICTORIA TANDLE and others.

It was also part of this conspiracy for VICTORIA TANDLE to sell narcotic drugs to DERRICK BROWN, BROOKE MINER, NICHOLAS TANDLE, RICHARD TAFT, and others.

It was also part of this conspiracy for JAMAAL MOODY to prepare crack cocaine and to sell cocaine to others.

It was also part of this conspiracy for ALEXIS BROIDA, a/k/a "Lexi," DERRICK BROWN, JAMES BUTLER, CHRISTOPHER JOHNSTON, DANIEL LITTLES, BROOKE MINER, ANDREA PARKER, TYQUAIL RAGGS, NICHOLAS TANDLE, SCOTT WHEATON, WILLIAM WHEATON, and BRANDON WILLIAMS to sell narcotic drugs to others.

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

OVERT ACTS

In the furtherance of the conspiracy and to affect the objects thereof, from on or before February 4, 2021, through on or about March 23, 2023, the following overt acts, among others, were committed:

1. On or about February 6, 2021, during a coded, guarded, and cryptic telephone communication, ANDREA PARKER ordered cocaine from KARMALUS HERRINGTON to sell to another.

2. On or about February 17, 2021, during a coded, guarded, and cryptic telephone communication, AMBER STREETER agreed to sell cocaine to SCOTT WHEATON.

3. On or about February 18, 2021, during a coded, guarded, and cryptic telephone communication, AMBER STREETER told KARMALUS HERRINGTON where narcotics were hidden.

4. On or about February 19, 2021, during a coded, guarded, and cryptic telephone communication, SCOTT WHEATON ordered cocaine from KARMALUS HERRINGTON to sell to others.

5. On or about February 19, 2021, during a series of coded, guarded, and cryptic telephone communications, WILLIAM WHEATON ordered cocaine from KARMALUS HERRINGTON to sell to others.

6. On or about February 20, 2021, during a coded, guarded, and cryptic telephone communication JAMES BUTLER ordered cocaine from KARMALUS HERRINGTON to sell to another.

7. On or about March 4, 2021, during a series of coded, guarded, and cryptic telephone communications, ALICA LANNON asked RYAN FANIEL for instructions regarding the sale of cocaine to another and where to locate the cocaine.

8. On or about March 14, 2021, during a series of coded, guarded, and cryptic telephone communications, CHRISTINA MARTIN consulted with ROMARIS GLANTON regarding the sale and location of narcotics.

9. On or about March 14, 2021, during a coded, guarded, and cryptic telephone communication, MICHAEL DANZEY agreed to provide cocaine to ROMARIS GLANTON.

10. On or about March 21, 2021, during a coded, guarded, and cryptic telephone communication, JAMES BUTLER inquired whether KARMALUS HERRINGTON had any “powder,” referring to powder cocaine, and KARMALUS HERRINGTON responded, “Sure, the best around.” HERRINGTON then agreed to supply BUTLER with cocaine.

11. On or about March 21, 2021, during a coded, guarded, and cryptic telephone communication, ANDREA PARKER requested that ROMARIS GLANTON supply her with a “gram of soft,” referring to a quantity of powder cocaine, and GLANTON agreed.

12. On or about March 23, 2021, KARMALUS HERRINGTON met WILLIAM WHEATON for a narcotics transaction in the Town of Lyons (Wayne County).

13. On or about March 23, 2021, WILLIAM WHEATON possessed cocaine in the Town of Lyons (Wayne County).

14. On or about April 1, 2021, during a coded, guarded, and cryptic telephone communication, RYAN FANIEL agreed to sell cocaine and oxycodone to another.

15. On or about April 13, 2021, during a coded, guarded, and cryptic telephone communication, TYRONE BERRY agreed to sell cocaine to KARAMLUS HERRINGTON.

16. On or about April 17, 2021, during a series of coded, guarded, and cryptic telephone communications, TYRONE BERRY advised KARMALUS HERRINGTON regarding the process of converting powder cocaine into crack cocaine.

17. On or about April 29, 2021, during a coded, guarded, and cryptic telephone communication, MEGAN MURRAY agreed to deliver cocaine to one of AARON SWEENEY’s customers.

18. On or about May 1, 2021, during a coded, guarded, and cryptic telephone communication, a customer asked TYRONE BERRY to supply him with “white girl,” referring to cocaine, and BERRY agreed to the sale.

19. On or about May 2, 2021, during a coded, guarded, and cryptic telephone communication, AARON SWEENEY described his method for packaging cocaine and for hiding the cocaine in order to avoid detection by the police.

20. On or about May 6, 2021, NATAN RIVERA, a/k/a “Nate,” went to a United Parcel Service (“UPS”) facility in the City of Rochester (Monroe County) in order to locate a package of narcotics.

21. On or about May 7, 2021, during a coded, guarded, and cryptic telephone communication, MEGAN MURRAY relayed a customer’s narcotics order to AARON SWEENEY.

22. On or about May 31, 2021, during a coded, guarded, and cryptic telephone communication, DANIEL LITTLES agreed to sell “a gram” of cocaine to another person.

23. On or about June 15, 2021, during a coded, guarded, and cryptic telephone communication, RYAN FANIEL agreed to supply AARON SWEENEY with cocaine.

24. On or about June 16, 2021, TERRANCE RAGGS and MICHAEL DANZEY delivered cocaine to Lainie Conrow in the Town of Sodus (Wayne County).

25. On or about June 22, 2021, ROMARIS GLANTON possessed more than one-eighth ounce of cocaine on his person in the Town of Acadia (Wayne County).

26. On or about June 22, 2021, ROMARIS GLANTON and CHRISTINA MARTIN possessed more than two ounces of cocaine at their residence in the Town of Newark (Wayne County).

27. On or about June 22, 2021, during a coded, guarded, and cryptic telephone communication, AARON SWEENEY confirmed that Keith Nesbitt, Sr. would soon be providing SWEENEY with oxycodone pills to sell.

28. On or about August 3, 2021, during a series of coded, guarded, and cryptic telephone communications, BROOKE MINER requested that VICTORIA TANDLE supply her with cocaine to sell to another person.

29. On or about September 4, 2021, during a coded, guarded, and cryptic telephone communication, DAVID SWEENEY ordered “a gram” of cocaine from AARON SWEENEY to sell to another person.

30. On or about September 20, 2021, during a series of coded, guarded, and cryptic telephone communications, RICHARD TAFT offered to sell oxycodone pills to VICTORIA TANDLE.

31. On or about September 24, 2021, during a coded, guarded, and cryptic telephone communication, BROOKE MINER told VICTORIA TANDLE that MINER’s customers “went crazy” for the cocaine TANDLE had previously supplied to MINER and MINER ordered “two” more quantities of that cocaine from TANDLE.

32. On or about September 25, 2021, during a series of coded, guarded, and cryptic telephone communications, MATTHEW SIMMONS agreed to supply VICTORIA TANDLE with cocaine to sell to another person.

33. On or about September 28, 2021, during a series of coded, guarded, and cryptic telephone communications, BRANDON WILLIAMS requested that MICHAEL DANZEY supply him with “eighteen” grams of cocaine the following day.

34. On or about September 29, 2021, BRANDON WILLIAMS met MICHAEL DANZEY at TERRANCE RAGGS’ residence in the Town of Sodus (Wayne County) in furtherance of their narcotics trafficking activities.

35. On or about October 18, 2021, during a coded, guarded, and cryptic telephone communication, RANDOLPH MATTICE ordered cocaine from AARON SWEENEY to sell to another person.

36. On or about October 20, 2021, during a series of coded, guarded, and cryptic telephone communications, RANDOLPH MATTICE ordered cocaine from AARON SWEENEY to sell to another person.

37. On or about October 24, 2021, during a coded, guarded, and cryptic telephone communication, MICHAEL DANZEY agreed to sell cocaine, which he referred to as “girl,” to MATTHEW SIMMONS.

38. On or about October 25, 2021, during a coded, guarded, and cryptic telephone communication, JAMAAL MOODY told VICTORIA TANDLE that he had spent the morning converting powder cocaine into crack cocaine for distribution to others.

39. On or about October 25, 2021, during a coded, guarded, and cryptic telephone communication, DAVID SWEENEY ordered one-eighth ounce of cocaine, which he referred to as a “ball,” from AARON SWEENEY for distribution to others.

40. On or about November 1, 2021, during a coded, guarded, and cryptic telephone communication, JAMAAL MOODY asked VICTORIA TANDLE if she had found the narcotics supply that he had left at her residence.

41. On or about November 5, 2021, during a coded, guarded, and cryptic telephone communication, an unidentified male customer requested that TERRANCE RAGGS supply him with one-eighth ounce of cocaine, which he referred to as an “eight-ball,” and RAGGS agreed to the sale.

42. On or about November 23, 2022, TYQUAIL RAGGS sold cocaine to an undercover police officer.

43. On or about December 1, 2021, during a coded, guarded, and cryptic telephone communication, DERRICK BROWN ordered “a gram” of cocaine from VICTORIA TANDLE to sell to another person.

44. On or about December 31, 2021, during a coded, guarded, and cryptic telephone communication, JASMINE OFRAY stated that she was sending “a lick,” referring to a drug customer, to ALEXIS BROIDA, a/k/a “Lexi,” because OFRAY “ran out” of drugs to sell.

45. On or about January 23, 2022, during a coded, guarded, and cryptic telephone communication, NICHOLAS TANDLE ordered a large quantity of cocaine, which he referred to as “a big thing of girl,” from VICTORIA TANDLE to sell to another person.

46. On or about February 8, 2022, BRANDON WILLIAMS possessed cocaine at his residence in the Town of Savannah (Wayne County).

47. On or about January 23, 2022, during a coded, guarded, and cryptic telephone communication, NICHOLAS TANDLE ordered an ounce of cocaine, which he referred to as “a zip,” from VICTORIA TANDLE.

48. On or about February 8, 2022, during a coded, guarded, and cryptic telephone communication, ALEXIS BROIDA, a/k/a “Lexi,” told an unidentified male customer that she had a significant quantity, which she referred to as “a load,” of oxycodone pills to sell.

49. On or about February 19, 2022, during a series of coded, guarded, and cryptic telephone communications, AARON SWEENEY requested that RAQUEL TORRES, a/k/a “Ma,” supply him with powder cocaine, which he referred to as “soft,” crack cocaine, which he referred to as “hard,” and oxycodone pills, which he referred to as “erks,” and RAQUEL TORRES, a/k/a “Ma,” agreed to the sale.

50. On or about February 19, 2022, during a series of coded, guarded, and cryptic telephone communications, RAQUEL TORRES, a/k/a “Ma,” asked NELSON MARTINEZ to supply her with “one” ounce of cocaine, and NELSON MARTINEZ agreed to the sale.

51. On or about February 19, 2022, during a series of coded, guarded, and cryptic telephone communications, JACQUINN EDWARDS agreed to supply RAQUEL TORRES, a/k/a “Ma,” with cocaine to sell to another person.

52. On or about February 19, 2022, AARON SWEENEY possessed oxycodone pills and more than one-half ounce of cocaine in the Village of Fairport (Monroe County).

53. On or about February 23, 2022, RYAN FANIEL and ALICA LANNON possessed cocaine at their residence in the Village of Palmyra (Wayne County).

54. On or about February 23, 2022, during a coded, guarded, and cryptic telephone communication, an unidentified male customer asked MICHAEL DANZEY to supply him with “three hundred” dollars’ worth of cocaine, and DANZEY agreed to the sale.

55. On or about March 10, 2022, during a coded, guarded, and cryptic telephone communication, RAYMOND VEGA offered to sell oxycodone pills to JASMINE OFRAY.

56. On or about March 15, 2022, VICTORIA TANDLE possessed more than four ounces of cocaine in the Town of Lyons (Wayne County).

57. On or about March 21, 2022, during a coded, guarded, and cryptic telephone communication, an unidentified female customer requested that RAQUEL TORRES, a/k/a “Ma” supply her with a “twenty dollar bag of coke,” referring to \$20 worth of cocaine, and TORRES agreed to the sale.

58. On or about April 4, 2022, MICHAEL DANZEY and TERRANCE RAGGS possessed more than eight ounces of cocaine at RAGGS’ residence in the Town of Sodus (Wayne County).

59. On or about May 5, 2022, during a series of coded, guarded, and cryptic telephone communications, WILLIAM SANCHEZ and JOSHUA RODRIGUEZ discussed how their narcotics should be packaged for resale.

60. On or about May 8, 2022, during a coded, guarded, and cryptic telephone communication, JOSHUA RODRIGUEZ reported to WILLIAM SANCHEZ how much narcotics they had available for sale.

61. On or about June 7, 2022, during a coded, guarded, and cryptic telephone communication with WILLIAM SANCHEZ, JEANETTE GONZALEZ inquired how the narcotics she had previously supplied to WILLIAM SANCHEZ were selling.

62. On or about June 8, 2022, during a series of coded, guarded, and cryptic telephone communications JEANETTE GONZALEZ agreed to supply NELSON MARTINEZ with cocaine to sell.

63. On or about June 8, 2022, during a coded, guarded, and cryptic telephone communication, DANIEL RODRIGUEZ offered to sell “three hundred” fentanyl pills to RAYMOND VEGA.

64. On or about June 9, 2022, during a coded, guarded, and cryptic telephone communication, NELSON MARTINEZ requested that JEANETTE GONZALEZ supply him with a quantity of cocaine to sell to another person, and he also complained that the cocaine JEANETTE GONZALEZ had previously supplied to him “looks like baby powder.”

65. On or about June 13, 2022, during a coded, guarded, and cryptic telephone communication, JEANETTE GONZALEZ told an unidentified female that she had some “bundies,” referring to quantity of heroin, to supply to the unidentified female.

66. On or about June 19, 2022, during a coded, guarded, and cryptic telephone communication, RAYMOND VEGA asked CARLOS LUNA, a/k/a “Flaco,” to supply him with “two” quantities of narcotics.

67. On or about June 21, 2021, during a coded, guarded, and cryptic telephone communication, DERRICK BROWN ordered “two” quantities of narcotics from VICTORIA TANGLE to sell to another person.

68. On or about June 28, 2022, WILLIAM SANCHEZ possessed cocaine and fentanyl in the City of Rochester (Monroe County).

69. On or about July 3, 2022, during a coded, guarded, and cryptic telephone communication, RAMOND VEGA ordered “one” quantity of cocaine from LUIS RIVERA, and RIVERA agreed to the sale.

70. On or about July 12, 2022, during a coded, guarded, and cryptic telephone communication, an unidentified male customer asked CARLOS LUNA, a/k/a “Flaco,” to supply him with “two boys,” referring to a quantity of heroin, and LUNA agreed to the sale.

71. On or about August 13, 2022, during a coded, guarded, and cryptic telephone communication, NATAN RIVERA, a/k/a “Nate,” and LUIS RIVERA discussed NATAN RIVERA’s impending trip to North Carolina in furtherance of their narcotics distribution activities.

72. On or about August 14, 2022, during a coded, guarded, and cryptic telephone communication, CHRISTOPHER JOHNSTON agreed to sell “ten” controlled substance pills to an unidentified male, and he noted that the pills were “better quality than last time.”

73. On or about August 22, 2022, during a coded, guarded, and cryptic telephone communication with RAYMOND VEGA, XAVIER ROMAN, a/k/a “Javi,” denied providing narcotics to customers without payment, and ROMAN assured VEGA that he was earning “bunches of money” for VEGA by selling controlled substances.

74. On or about August 30, 2022, during a series of coded, guarded, and cryptic telephone communications, CHRISTOPHER JOHNSTON asked DANIEL RODRIGUEZ to

supply him with “one hundred” fentanyl pills to sell, so JOHNSTON can “make money,” as well as a quantity of cocaine.

75. On or about August 30, 2022, DANIEL RODRIGUEZ possessed cocaine and fentanyl pills in the Town of Geneva (Ontario County).

76. On or about September 1, 2022, JACQUINN EDWARDS possessed more than four ounces of cocaine in the City of Rochester (Monroe County).

77. On or about September 1, 2022, XAVIER ROMAN, a/k/a “Javi,” possessed cocaine in the City of Rochester (Monroe County).

78. On or about September 1, 2022, RAYMOND VEGA possessed more than one-half ounce of cocaine in the City of Rochester (Monroe County).

79. On or about September 6, 2022, during a coded, guarded, and cryptic telephone communication, ULYSSES SANCHEZ, a/k/a “Chichi,” ordered narcotic drugs from LUIS RIVERA.

80. On or about September 30, 2022, CARLOS LUNA, a/k/a “Flaco,” possessed more than one-half ounce of cocaine in the City of Rochester (Monroe County).

81. On or about October 5, 2022, during a coded, guarded, and cryptic telephone communication, ULYSSES SANCHEZ, a/k/a “Chichi,” agreed to sell “two” quantities of a narcotic drug to an unidentified male customer, and he reminded the customer that he still owes ULYSSES SANCHEZ money for a prior narcotics supply.

82. On or about October 2, 2022, during a coded, guarded, and cryptic telephone communication, Brian Price requested that LUIS RIVERA supply him with a small amount of cocaine, and LUIS RIVERA indicated that his sons were currently only selling cocaine in “thirty-one” gram quantities.

83. On or about October 11, 2022, during a coded, guarded, and cryptic telephone communication, JACOB RIVERA, a/k/a “J,” asked TRESHON ALEXANDER, a/k/a “Tre,” if he had obtained the tracking number for a package of narcotics that was recently shipped to “Pullman” Avenue in the City of Rochester, and TRESHON ALEXANDER, a/k/a “Tre,” confirmed that he had.

84. On or about October 12, 2022, TRESHON ALEXANDER, a/k/a “Tre,” went to 73 Pullman Avenue, in the City of Rochester, New York, to await the delivery of a shipment of narcotics.

85. On or about October 12, 2022, during a coded, guarded, and cryptic telephone communication, JACOB RIVERA, a/k/a “J,” informed JAY QUANNA ARRIMINTHA GREEN that the “tracking” information indicated the package would arrive at her residence “before twelve.”

86. On or about October 12, 2022, during a coded, guarded, and cryptic telephone communication with JAY QUANNA ARRIMINTHA GREEN, JACOB RIVERA, a/k/a “J,” mentioned his desire to buy real estate with his narcotics proceeds, and JAY QUANNA ARRIMINTHA GREEN suggested that JACOB RIVERA, a/k/a “J,” start a business as a way “to clean your money.”

87. On or about December 21, 2022, during a coded, guarded, and cryptic telephone communication, LUIS RIVERA directed LUIS EMMANUEL RIVERA, a/k/a “Manuel,” a/k/a “Manny” to provide heroin to one of LUIS RIVERA’s customers.

88. On or about December 29, 2022, during a series of coded, guarded, and cryptic telephone communications, GENEVA RIVERA, a/k/a Geneva Brown, attempted to learn from LUIS RIVERA the whereabouts of a narcotics shipment and/or if payment had been made for a shipment of narcotics.

89. On or about December 30, 2022, during a coded, guarded, and cryptic telephone communication, GENEVA RIVERA, a/k/a Geneva Brown, and LUIS RIVERA discussed the location of money that needs to be utilized as payment for a shipment of narcotics.

90. On or about January 9, 2023, TYQUAIL RAGGS sold cocaine to an undercover police officer.

91. On or about January 19, 2023, during a coded, guarded, and cryptic telephone communication, an unidentified customer requested that LUIS EMMANUEL RIVERA, a/k/a “Manuel,” a/k/a “Manny,” supply him with “girl,” referring to a quantity of cocaine, and LUIS EMMANUEL RIVERA, a/k/a “Manuel,” a/k/a “Manny,” stated that he currently only possessed “a ball,” referring to one-eighth ounce of cocaine, though he “can get more.”

92. On or about February 1, 2023, LUIS RIVERA possessed narcotics in the City of Rochester (Monroe County).

93. On or about February 1, 2023, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” a/k/a “Manny,” possessed narcotics in the City of Rochester (Monroe County).

94. On or about March 23, 2023, TYQUAIL RAGGS sold cocaine to an undercover police officer.

Count Two

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

Said defendant, on or about the 17th day of February, 2021, in the Town of Newark, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, SCOTT WHEATON, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Sections 110.00 and 220.09(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 17th day of February, 2021, in the Town of Newark, Wayne County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Four

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

Said defendant, on or about and between the 19th day of February, 2021, and the 20th day of February, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Five

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

Said defendant, on or about and between the 19th day of February, 2021, and the 20th day of February, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Six

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

Said defendant, on or about the 23rd day of March, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Seven

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

Said defendant, on or about the 23rd day of March, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Eight

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

Said defendants, acting in concert, on or about the 6th day of February, 2021, in the Village of Newark, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Nine

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

Said defendant, on or about the 20th day of February, 2021, in the Town of Newark, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Ten

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

Said defendant, on or about the 20th day of February, 2021, in the Town of Newark, Wayne County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine, with intent to sell it.

Count Eleven

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

Said defendant, on or about the 19th day of May, 2021, in the Town of Arcadia, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Twelve

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

Said defendant, on or about the 19th day of May, 2021, in the Town of Arcadia, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Thirteen

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

Said defendant, on or about the 31st day of May, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Fourteen

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

Said defendant, on or about the 1st day of May, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Fifteen

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

Said defendant, on or about the 17th day of April, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Sixteen

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

Said defendants, acting in concert, on or about the 17th day of April, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Seventeen

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

Said defendant, on or about the 10th day of August, 2021, in the Village of Newark, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Eighteen

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

Said defendant, on or about the 10th day of August, 2021, in the Village of Newark, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Nineteen

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

Said defendant, on or about the 1st day of November, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Twenty

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

Said defendant, on or about the 23rd day of January, 2022, in the Town of Lyons, Wayne County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine, with intent to sell it.

Count Twenty-one

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

Said defendant, on or about the 1st day of December, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Twenty-two

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

Said defendant, on or about the 1st day of December, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine, with intent to sell it.

Count Twenty-three

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

Said defendant, on or about the 24th day of September, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Twenty-four

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

Said defendant, on or about the 24th day of September, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine, with intent to sell it.

Count Twenty-five

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

Said defendant, on or about the 19th day of May, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: oxycodone.

Count Twenty-six

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

Said defendant, on or about the 25th day of September, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Twenty-seven

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

Said defendant, on or about the 25th day of September, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine, with intent to sell it.

Count Twenty-eight

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

Said defendant, on or about the 30th day of December, 2021, in the Town of Savannah, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Twenty-nine

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

Said defendant, on or about the 25th day of October, 2021, in the Village of Fairport, Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Thirty

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

Said defendant, on or about the 25th day of October, 2021, in the Village of Fairport, Monroe County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine, with intent to sell it.

Count Thirty-one

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

Said defendant, on or about the 19th day of October, 2021, in the City of Canandaigua, Ontario County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Thirty-two

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

Said defendant, on or about the 19th day of October, 2021, in the City of Canandaigua, Ontario County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Thirty-three

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

Said defendant, on or about the 8th day of December, 2021, in the City of Canandaigua, Ontario County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Thirty-four

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

Said defendant, on or about the 8th day of December, 2021, in the City of Canandaigua, Ontario County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine, with intent to sell it.

Count Thirty-five

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

CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 26th day of May, 2021, in the Village of Fairport, Monroe County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: oxycodone, with intent to sell it.

Count Thirty-six

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

Said defendant, on or about the 22nd day of June, 2021, in the Village of Fairport, Monroe County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: oxycodone, with intent to sell it.

Count Thirty-seven

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

Said defendant, on or about the 22nd day of July, 2021, in the Village of Fairport, Monroe County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: oxycodone, with intent to sell it.

Count Thirty-eight

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

Said defendant, on or about the 10th day of August, 2021, in the Village of Fairport, Monroe County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: oxycodone, with intent to sell it.

Count Thirty-nine

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

Said defendants, acting in concert, on or about the 6th day of September, 2021, in the Town of Lyons, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Forty

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

Said defendants, acting in concert, on or about the 16th day of June, 2021, in the Town of Sodus, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Forty-one

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

Said defendants, acting in concert, on or about the 16th day of June, 2021, in the Town of Sodus, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Forty-two

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

Said defendant, on or about the 23rd day of November, 2022, in the Town of Sodus, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Forty-three

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

Said defendant, on or about the 23rd day of November, 2022, in the Town of Sodus, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Forty-four

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

Said defendant, on or about the 30th day of November, 2022, in the Town of Sodus, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Forty-five

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

Said defendant, on or about the 30th day of November, 2022, in the Town of Sodus, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Forty-six

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

Said defendant, on or about the 9th day of January, 2023, in the Town of Sodus, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Forty-seven

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

Said defendant, on or about the 9th day of January, 2023, in the Town of Sodus, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Forty-eight

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

Said defendant, on or about the 28th day of February, 2023, in the Town of Sodus, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Forty-nine

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

Said defendant, on or about the 28th day of February, 2023, in the Town of Sodus, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Fifty

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

Said defendant, on or about the 23rd day of March, 2023, in the Town of Sodus, Wayne County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Fifty-one

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

Said defendant, on or about the 23rd day of March, 2023, in the Town of Sodus, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Fifty-two

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

Said defendant, on or about the 22nd day of June, 2021, in the Town of Arcadia, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Fifty-three

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

Said defendant, on or about the 22nd day of June, 2021, in the Town of Arcadia, Wayne County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Fifty-four

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

Said defendants, acting in concert, on or about the 22nd day of June, 2021, in the Town of Newark, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Fifty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, ROMARIS GLANTON and CHRISTINA MARTIN, 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, on or about the 22nd day of June, 2021, in the Town of Newark, Wayne County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Fifty-six

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

Said defendants, acting in concert, on or about the 22nd day of June, 2021, in the Town of Newark, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: oxycodone, with intent to sell it.

Count Fifty-seven

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

Said defendants, acting in concert, on or about the 22nd day of June, 2022, in the Town of Newark, Wayne County, knowingly possessed diluents, dilutants or adulterants, including but not limited to, any of the following: quinine hydrochloride, mannitol, mannite, lactose or dextrose, adapted for the dilution of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for

purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

Count Fifty-eight

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

Said defendants, acting in concert, on or about the 22nd day of June, 2021, in the Town of Newark, Wayne County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intended to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count Fifty-nine

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

Said defendants, acting in concert, on or about the 22nd day of June, 2021, in the Town of Newark, Wayne County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count Sixty

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

Said defendants, acting in concert, on or about the 23rd day of February, 2022, in the Village of Palmyra, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Sixty-one

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

Said defendants, acting in concert, on or about the 23rd day of February, 2022, in the Village of Palmyra, Wayne County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intended to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count Sixty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, RYAN FANIEL and ALICA LANNON, of the crime of **CRIMINALLY USING OF**

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

Said defendants, acting in concert, on or about the 23rd day of February, 2022, in the Village of Palmyra, Wayne County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count Sixty-three

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

Said defendant, on or about the 8th day of February, 2022, in the Town of Savannah, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Sixty-four

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

Said defendant, on or about the 8th day of February, 2022, in the Town of Savannah, Wayne County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some

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

Count Sixty-five

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

Said defendant, on or about the 15th day of March, 2022, in the Town of Lyons, Wayne County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

Count Sixty-six

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

Said defendant, on or about the 15th day of March, 2022, in the Town of Lyons, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Sixty-seven

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

Said defendants, acting in concert, on or about the 4th day of April, 2022, in the Town of Sodus, Wayne County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

Count Sixty-eight

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

Said defendants, acting in concert, on or about the 4th day of April, 2022, in the Town of Sodus, Wayne County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Sixty-nine

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

Said defendants, acting in concert, on or about the 4th day of April, 2022, in the Town of Sodus, Wayne County, knowingly possessed diluents, dilutants or adulterants, including but not limited to, any of the following: quinine hydrochloride, mannitol, mannite, lactose or dextrose, adapted for the dilution of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for

purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

Count Seventy

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

Said defendants, acting in concert, on or about the 4th day of April, 2022, in the Town of Sodus, Wayne County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intended to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count Seventy-one

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

Said defendants, acting in concert, on or about the 4th day of April, 2022, in the Town of Sodus, Wayne County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count Seventy-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL DANZEY, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 4th day of April, 2022, in the Town of Sodus, Wayne County, knowingly possessed a loaded firearm, to wit: a Glock .40 caliber handgun, in violation of Section 265.02(1) of the Penal Law of the State of New York.

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

Count Seventy-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, TERRANCE RAGGS, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 4th day of April, 2022, in the Town of Sodus, Wayne County, knowingly possessed a loaded firearm, to wit: a Glock .40 caliber handgun, in violation of Section 265.02(1) of the Penal Law of the State of New York.

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

Count Seventy-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL DANZEY, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE**

THIRD DEGREE in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 4th day of April, 2022, in the Town of Sodus, Wayne County, knowingly possessed a firearm, to wit: a Glock .40 caliber handgun.

Count Seventy-five

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

Said defendant, on or about the 4th day of April, 2022, in the Town of Sodus, Wayne County, knowingly possessed a firearm, to wit: a Glock .40 caliber handgun.

Count Seventy-six

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

Said defendant, on or about the 4th day of April, 2022, in the Town of Sodus, Wayne County, knowingly possessed a firearm, to wit: a Glock .40 caliber handgun.

Count Seventy-seven

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

Said defendant, on or about the 4th day of April, 2022, in the Town of Sodus, Wayne County, knowingly possessed a firearm, to wit: a Glock .40 caliber handgun.

Count Seventy-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL DANZEY, of the crime of **ATTEMPTED MURDER IN THE SECOND DEGREE** in violation of Sections 110.00 and 125.25(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of June, 2021, in the Town of Lyons, Wayne County, intentionally attempted to cause the death of another person by shooting him.

Count Seventy-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL DANZEY, of the crime of **ASSAULT IN THE FIRST DEGREE** in violation of Section 120.10(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th days of June, 2021, in the Town of Lyons, Wayne County, intentionally caused serious physical injury to another person by means of a deadly weapon.

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 Eighty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL DANZEY, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(1)(b) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of June, 2021, in the Town of Lyons, Wayne County, knowingly possessed a loaded firearm with intent to use the same unlawfully against another.

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 Eighty-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL DANZEY, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of June, 2021, in the Town of Lyons, Wayne County, knowingly possessed a loaded firearm, in violation of Section 265.02(1) of the Penal Law of the State of New York.

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

Count Eighty-two

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

Said defendant, on or about the 9th day of June, 2021, in the Town of Lyons, Wayne County, knowingly possessed a firearm.

Count Eighty-three

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

Said defendant, on or about the 9th day of June, 2021, in the Town of Lyons, Wayne County, knowingly possessed a firearm.

Count Eighty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL DANZEY, of the crime of **CRIMINAL USE OF A FIREARM IN THE FIRST DEGREE** in violation of Section 265.09(1)(a) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of June, 2021, in the Town of Lyons, Wayne County, committed a class B violent felony offense, to wit: Attempted Murder in the Second Degree in violation of Sections 110.00 and 125.25(1) of the Penal Law of the State of New York, and possessed a deadly weapon that was a loaded weapon from which a shot, readily capable of producing death or other serious injury may be discharged.

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 Eighty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, TERRANCE RAGGS, of the crime of **HINDERING PROSECUTION IN THE SECOND DEGREE** in violation of Section 205.60 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 9th day of June, 2021, and the 10th day of June, 2021, in the City of Geneva, Ontario County, rendered criminal assistance to a person, to wit: MICHAEL DANZEY, who had committed a class B or class C felony.

Count Eighty-six

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

Said defendant, on or about the 28th day of December, 2021, in the City of Rochester, Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: oxycodone.

Count Eighty-seven

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

Said defendant, on or about and between the 8th day of February, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: oxycodone, with intent to sell it.

Count Eighty-eight

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

Said defendant, on or about the 30th day of May, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: oxycodone.

Count Eighty-nine

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

Said defendant, on or about the 20th day of August, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Ninety

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

Said defendant, on or about the 19th day of February, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing a narcotic drug, to wit: cocaine, and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Ninety-one

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

Said defendant, on or about the 19th day of February, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Ninety-two

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

Said defendant, on or about the 19th day of February, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Ninety-three

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

Said defendant, on or about the 19th day of February, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Ninety-four

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

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

Said defendant, on or about the 19th day of February, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Ninety-five

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

Said defendant, on or about the 19th day of February, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Ninety-six

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

Said defendant, on or about the 19th day of February, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing a narcotic drug, to wit: cocaine, and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Ninety-seven

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

Said defendant, on or about the 19th day of February, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: oxycodone.

Count Ninety-eight

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

Said defendant, on or about and between the 19th day of February, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Ninety-nine

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

Said defendant, on or about the 19th day of February, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed one or more preparations, compounds,

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

Count One hundred

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

Said defendant, on or about and between the 19th day of February, 2022, in the Village of Fairport, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: oxycodone, with intent to sell it.

Count One hundred one

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

Said defendant, on or about and between the 19th day of February, 2022, in the Village of Fairport, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count One hundred two

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

Said defendant, on or about the 19th day of February, 2022, in the Village of Fairport, Monroe County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count One hundred three

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

Said defendant, on or about the 23rd day of February, 2022, in the Village of Fairport, Monroe County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intended to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count One hundred four

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

Said defendant, on or about the 23rd day of February, 2022, in the Village of Fairport, Monroe County, knowingly possessed scales and balances used or designed for the purpose of

weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count One hundred five

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

Said defendant, on or about the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

Count One hundred six

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

Said defendant, on or about and between the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count One hundred seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JACQUINN EDWARDS, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA**

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

Said defendant, on or about the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly possessed diluents, dilutants or adulterants, including but not limited to, any of the following: quinine hydrochloride, mannitol, mannite, lactose or dextrose, adapted for the dilution of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

Count One hundred eight

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

Said defendant, on or about the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count One hundred nine

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

Said defendant, on or about the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly possessed a firearm, to wit: a .380 pistol bearing serial number 380054970.

Count One hundred ten

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

Said defendant, on or about the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly possessed a firearm, to wit: a Colt Government Model 45 pistol.

Count One hundred eleven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JACQUINN EDWARDS, 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 defendant, on or about the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly possessed a firearm which had been defaced for the purpose of concealment or prevention of the detection of a crime or misrepresenting the identity of such firearm, to wit: a Colt Government Model 45 pistol serial number filed off.

Count One hundred twelve

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

Said defendant, on or about the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly possessed a firearm, to wit: a .380 pistol bearing serial number 380054970.

Count One hundred thirteen

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

Said defendant, on or about the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly possessed a firearm, to wit: a Colt Government Model 45 pistol.

Count One hundred fourteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, XAVIER ROMAN, a/k/a “Javi” and RAYMOND VEGA, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count One hundred fifteen

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

Said defendant, on or about the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count One hundred sixteen

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

Said defendant, on or about the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with intent to sell it.

Count One hundred seventeen

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

Said defendant, on or about the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: oxycodone, with intent to sell it.

Count One hundred eighteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RAYMOND VEGA, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN**

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

Said defendant, on or about the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly possessed diluents, dilutants or adulterants, including but not limited to, any of the following: quinine hydrochloride, mannitol, mannite, lactose or dextrose, adapted for the dilution of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

Count One hundred nineteen

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

Said defendant, on or about the 1st day of September, 2022, in the City of Rochester, Monroe County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count One hundred twenty

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

Said defendants, acting in concert, on or about the 8th day of June, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count One hundred twenty-one

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

Said defendant, on or about the 5th day of May, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count One hundred twenty-two

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

Said defendant, on or about the 1st day of June, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

Count One hundred twenty-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILLIAM SANCHEZ, 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 an unidentified male, on or about the 21st day of June, 2022, in the City of Rochester, Monroe County, knowingly possessed a loaded firearm, to wit: a Stark model AR-15 bearing serial number 21-019769, in violation of Section 265.02(1) of the Penal Law of the State of New York.

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

Count One hundred twenty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILLIAM SANCHEZ, 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, acting in concert with an unidentified male, on or about the 21st day of June, 2022, in the City of Rochester, Monroe County, knowingly possessed an assault weapon, to wit: a Stark model AF-15 bearing serial number 21-019769, a semiautomatic rifle with a folding or telescoping stock, a second handgrip or protruding grip that can be held by a none shooting hand, a protruding pistol grip, a muzzle break, and this weapon accepts a detachable magazine.

Count One hundred twenty-five

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

Said defendant, on or about the 21st day of June, 2022, in the City of Rochester, Monroe County, knowingly possessed a firearm, to wit: a Stark model AF-15 bearing serial number 21-019769.

Count One hundred twenty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILLIAM SANCHEZ, 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, acting in concert with an unidentified male, on or about the 21st day of June, 2022, in the City of Rochester, Monroe County, knowingly possessed a firearm, to wit: a Stark model AF-15 bearing serial number 21-019769.

Count One hundred twenty-seven

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

Said defendant, on or about the 21st day of June, 2022, in the City of Rochester, Monroe County, knowingly possessed diluents, dilutants or adulterants, including but not limited to, any of the following: quinine hydrochloride, mannitol, mannite, lactose or dextrose, adapted for the dilution of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

Count One hundred twenty-eight

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

Said defendant, on or about the 21st day of June, 2022, in the City of Rochester, Monroe County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intended to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count One hundred twenty-nine

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

Said defendant, on or about the 21st day of June, 2022, in the City of Rochester, Monroe County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count One hundred thirty

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

Said defendant, on or about the 25th day of June, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count One hundred thirty-one

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

Said defendant, on or about the 21st day of August, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count One hundred thirty-two

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

Said defendant, on or about the 30th day of September, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count One hundred thirty-three

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

Said defendant, on or about the 30th day of September, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count One hundred thirty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CARLOS LUNA, a/k/a “Flaco,” of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 30th day of September, 2022, in the City of Rochester, Monroe County, knowingly possessed diluents, dilutants or adulterants, including but not limited to, any of the following: quinine hydrochloride, mannitol, mannite, lactose or dextrose, adapted for the dilution of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

Count One hundred thirty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CARLOS LUNA, a/k/a “Flaco,” of the crime of **CRIMINALLY USING DRUG**

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

Said defendant, on or about the 30th day of September, 2022, in the City of Rochester, Monroe County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intended to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count One hundred thirty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CARLOS LUNA, a/k/a “Flaco,” of the crime of **CRIMINALLY USING OF DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of Section 220.50(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 30th day of September, 2022, in the City of Rochester, Monroe County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count One hundred thirty-seven

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

Said defendant, on or about the 30th day of August, 2022, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

Count One hundred thirty-eight

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

Said defendant, on or about the 30th day of August, 2022, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count One hundred thirty-nine

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

Said defendant, on or about the 30th day of August, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl, with intent to sell it.

Count One hundred forty

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

Said defendant, on or about the 30th day of August, 2022, in the Town of Geneva, Ontario County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with intent to sell it.

Count One hundred forty-one

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

Said defendant, on or about the 30th day of August, 2022, in the Town of Geneva, Ontario County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count One hundred forty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, NATAN RIVERA, a/k/a “Nate,” of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of Sections 110.00 and 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 6th day of May, 2021, and the 7th day of May, 2021, in the City of Rochester, Monroe County, knowingly and unlawfully attempted to 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 eight ounces or more.

Count One hundred forty-three

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

Said defendant, on or about and between the 6th day of May, 2021, and the 7th day of May, 2021, in the City of Rochester, Monroe County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine, with intent to sell it.

Count One hundred forty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAY QUANNA ARRIMINTHA GREEN, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of Sections 110.00 and 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 16th day of June, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

Count One hundred forty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAY QUANNA ARRIMINTHA GREEN, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation

of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 16th day of June, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl, with intent to sell it.

Count One hundred forty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, LUIS RIVERA, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” and NATAN RIVERA, a/k/a “Nate,” of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of Sections 110.00 and 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about and between the 13th day of August, 2022, and the 21st day of August, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully attempted to 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 eight ounces or more.

Count One hundred forty-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, LUIS RIVERA, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” and NATAN RIVERA, a/k/a “Nate,” of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about and between the 13th day of August, 2022, and the 21st day of August, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine, with intent to sell it.

Count One hundred forty-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, LUIS RIVERA, JACOB RIVERA, a/k/a “J,” and JAY QUANNA ARRIMINTHA GREEN, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of Sections 110.00 and 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about and between the 3rd day of October, 2022, and the 5th day of October, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

Count One hundred forty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, LUIS RIVERA, JACOB RIVERA, a/k/a “J,” and JAY QUANNA ARRIMINTHA GREEN, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about and between the 3rd day of October, 2022, and the 5th day of October, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl, with intent to sell it.

Count One hundred fifty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, LUIS RIVERA, JACOB RIVERA, a/k/a “J,” TRESHON ALEXANDER, a/k/a “Tre,” and JAY QUANNA ARRIMINTHA GREEN, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of Sections 110.00 and 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about and between the 9th day of October, 2022, and the 12th day of October, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully attempted to 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 eight ounces or more.

Count One hundred fifty-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, LUIS RIVERA, JACOB RIVERA, a/k/a “J,” TRESHON ALEXANDER, a/k/a “Tre,” and JAY QUANNA ARRIMINTHA GREEN, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about and between the 9th day of October, 2022, and the 12th day of October, 2022, in the City of Rochester, Monroe County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine, with intent to sell it.

Count One hundred fifty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS RIVERA, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of Sections 110.00 and 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 31st day of January, 2023, in the City of Rochester, Monroe County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

Count One hundred fifty-three

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

Said defendant, on or about the 31st day of January, 2023, in the City of Rochester, Monroe County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl, with intent to sell it.

Count One hundred fifty-four

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

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly possessed a firearm, to wit: DPMS AR15 Rifle, Serial Number FFH043819.

Count One hundred fifty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS RIVERA, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly possessed an assault weapon, to wit: DPMS AR15 Rifle, Serial Number FFH043819, with muzzle flash, collapsible stock and pistol grip.

Count One hundred fifty-six

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

Said defendant, on or about the 1st day of February, 2023, in the City or Rochester, Monroe County, knowingly possessed a firearm, to wit: DPMS AR15 Rifle, Serial Number FFH043819.

Count One hundred fifty-seven

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

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or

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

Count One hundred fifty-eight

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

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count One hundred fifty-nine

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

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: heroin and fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

Count One hundred sixty

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

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

Said defendant, on or about and between the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred sixty-one

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

Said defendant, on or about and between the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with intent to sell it.

Count One hundred sixty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” 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 the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly possessed five or more firearms, to wit: Glock 26 9mm pistol, Serial Number FWF075, Glock 22 .40cal pistol, Serial Number WHZ436, Glock 20 10mm pistol, Serial Number BPUP775, 9mm pistol, no serial number, Roman Mini Drago 7.62x39 rifle, Serial Number PE-4760-2018RO, Aero Precision M4E1 7.5” 5.56 AR pistol, Serial Number M4-0035057.

Count One hundred sixty-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly possessed a firearm, to wit: Glock 26 9mm pistol, Serial Number FWF075.

Count One hundred sixty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly possessed a firearm, to wit: Glock 22 .40cal pistol, Serial Number WHZ436.

Count One hundred sixty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly possessed a firearm, to wit: Glock 20 10mm pistol, Serial Number BPUP775.

Count One hundred sixty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly possessed a firearm, to wit: 9mm pistol, unknown make/model pistol, no serial number.

Count One hundred sixty-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly possessed a firearm, to wit: Roman Mini Drago 7.62x39 rifle, Serial Number PE-4760-2018RO.

Count One hundred sixty-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly possessed an assault weapon, to wit: Roman Mini Drago 7.62x39 rifle, Serial

Number PE-4760-2018RO, a semiautomatic pistol with detachable magazine, flash suppressor and muzzle break, slot that partially covered the barrel, with threaded barrel, and a magazine forward of the pistol grip and separate from the pistol grip.

Count One hundred sixty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly possessed a firearm, to wit: Aero Precision M4E1 7.5” 5.56 AR pistol, Serial Number M4-0035057.

Count One hundred seventy

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly possessed an assault weapon, to wit: Aero Precision M4E1 7.5” 5.56 AR pistol, Serial Number M4-0035057, semiautomatic pistol with detachable magazine, magazine forward of the pistol grip, muzzle break or flash suppressor, that has a fore grip readily capable of being

held by the non-trigger hand, with a shroud that partially covers the barrel so it can be held without causing a burn.

Count One hundred seventy-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly possessed a firearm, to wit: Master Piece Arms 45ACP Pistol, Serial Number A13950.

Count One hundred seventy-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred seventy-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” of the crime of **CRIMINAL POSSESSION OF**

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

Said defendant, on or about the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count One hundred seventy-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 1st day of February, 2023, in the City of Rochester, Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count One hundred seventy-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, LUIS RIVERA and JACOB RIVERA, a/k/a “J,” of the crime of **OPERATING AS A MAJOR TRAFFICKER** in violation of §220.77(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, from on or about June 10, 2022, through on or about February 1, 2023, in the City of Rochester, Monroe County, and elsewhere, acted as director of a

controlled substance organization, during which period such controlled substance organization sold one or more controlled substances, and the proceeds collected or due from such sale or sales had a total aggregate value of seventy-five thousand dollars or more.

Count One hundred seventy-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS RIVERA and JACOB RIVERA, a/k/a “J,” of the crime of **OPERATING AS A MAJOR TRAFFICKER** in violation of §220.77(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, from on or about August 1, 2022, through on or about February 1, 2023, in the City of Rochester, Monroe County, and elsewhere, as a profiteer, knowingly and unlawfully sold, on one or more occasions within six months or less, a narcotic drug, and the proceeds collected or due from such sale or sales had a total aggregate value of seventy-five thousand dollars or more.

Count One hundred seventy-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, LUIS RIVERA, LUIS EMMANUEL RIVERA, a/k/a “Manuel,” a/k/a “Manny,” and JACOB RIVERA, a/k/a “J,” of the crime of **MONEY LAUNDERING IN THE SECOND DEGREE** in violation of §470.15(1)(a)(ii)(A) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, from on or about October 5, 2022, through on or about February 1, 2023, in the City of Rochester, Monroe County, and elsewhere, knowing that the property involved in one or more financial transactions represents the proceeds of the criminal sale

of a controlled substance, conducted one or more financial transactions which in fact involved the proceeds of the criminal sale of a controlled substance.

Dated: June 7, 2023
Lyons, New York

NICOLE KEARY
Deputy Attorney General
Organized Crime Task Force

By:

JAMES J. MINDELL
Assistant Deputy Attorney General
and Sr. Investigative Counsel
Organized Crime Task Force
300 South State Street, Suite 300
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GRAND JURY FOREPERSON
Dated: June 7, 2023