

STATE OF NEW YORK: SUPREME COURT
BRONX COUNTY

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THE PEOPLE OF THE STATE OF NEW YORK

IND. #

-against-

DANIEL ABASCAL PENA
MANUEL CASTILLANO, a.k.a. Cunado
TOMAS SALINAS
MANUEL AMPARO, a.k.a. Cacu
CARLOS ALBERTO BORGES PEREZ
ARGENIS GRULLON, a.k.a. Hanley
FRANCISCO MARTINEZ REYES, a.k.a. Viejo
EDWIN NUNEZ SIERRA, a.k.a. La Papa
JOSE RODRIGUEZ, a.k.a. Rafa
REYMON RIVERA, a.k.a. Dioco
HECTOR DIAZ, a.k.a. Shorty
LUIS MARTINEZ, a.k.a. Majimbe
JUAN MIGUEL MARTE JAVIER
YEIMY MATIAS
RYAN MARTINEZ
GISETTE HERNANDEZ, a.k.a. Neme
FERNANDO SUERO
DOMINGO PENA
CARLOS ALMONTE, a.k.a. Luis Rivera
CARLOS HIERRO-MATA
JANDHEL RESTITUYO VASQUEZ
LUIS AUDE-MORA
AMAUERIS SANCHEZ
MANUEL TORRES, a.k.a. Raul
OSCARHYL MARTINEZ AUDE

DEFENDANTS.

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COUNT ONE

THE GRAND JURY OF BRONX COUNTY, by this indictment, accuses the defendants,
DANIEL ABASCAL PENA, MANUEL CASTILLANO, a.k.a. Cunado, TOMAS SALINAS,
MANUEL AMPARO, a.k.a. Cacu, CARLOS ALBERTO BORGES PEREZ, ARGENIS

GRULLON, a.k.a. Hanley, FRANCISCO MARTINEZ REYES, a.k.a. Viejo, EDWIN NUNEZ SIERRA, a.k.a. La Papa, JOSE RODRIGUEZ, a.k.a. Rafa, REYMON RIVERA, a.k.a. Dioco, HECTOR DIAZ, a.k.a. Shorty, LUIS MARTINEZ, a.k.a. Majimbe, JUAN MIGUEL MARTE JAVIER, YEIMY MATIAS, RYAN MARTINEZ, GISETTE HERNANDEZ, a.k.a. Neme, FERNANDO SUERO, DOMINGO PENA, CARLOS ALMONTE, a.k.a. Luis Rivera, CARLOS HIERRO-MATA, JANDHEL RESTITUYO VASQUEZ, LUIS AUDE-MORA, AMAURIS SANCHEZ, MANUEL TORRES, a.k.a. Raul, and OSCARHYL MARTINEZ AUDE 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 approximately April 29, 2015, through on or about approximately September 3, 2016, in Bronx County, Suffolk County, New York County, and elsewhere within and outside the State of New York, with intent that conduct constituting the crimes of Operating as a Major Trafficker, Criminal Sale of a Controlled Substance in the First Degree, Criminal Sale of a controlled substance in the Second Degree, Criminal Possession of a Controlled Substance in the First Degree, and Criminal Possession of a Controlled Substance in the Second Degree, said crimes being Class A Felonies, be performed, the defendants agreed with each other and with others, known and unknown, to engage in or cause the performance of such conduct as would constitute the above-mentioned Class A Felonies.

PREAMBLE

It was the purpose of this conspiracy to possess heroin in amounts greater than eight ounces and to sell heroin in amounts greater than two ounces in Bronx County, Suffolk County, New York County, and elsewhere in the State of New York, the State of New Jersey, the State of Arizona, the Commonwealth of Massachusetts, and the Commonwealth of Pennsylvania.

It was part of this conspiracy for DANIEL ABASCAL PENA to sell heroin to MANUEL CASTILLANO, a.k.a. Cunado, TOMAS SALINAS, and FERNANDO SUERO for resale to locations within and outside of Bronx County.

It was part of this conspiracy for MANUEL CASTILLANO, a.k.a. Cunado, to sell heroin to REYMON RIVERA, a.k.a. Dioco, LUIS MARTINEZ, a.k.a. Majimbe, and CARLOS HIERRO-MATA for resale to locations within and outside of Bronx County.

It was part of this conspiracy for MANUEL AMPARO, a.k.a. Cacu, to sell heroin for MANUEL CASTILLANO, a.k.a. Cunado, in locations within and outside of Bronx County.

It was part of this conspiracy for TOMAS SALINAS to sell heroin to REYMON RIVERA, a.k.a. Dioco, LUIS MARTINEZ, a.k.a. Majimbe, and CARLOS HIERRO-MATA for their resale to locations within and outside of Bronx County.

It was part of this conspiracy for CARLOS ALBERTO BORGES PEREZ to purchase heroin from MANUEL CASTILLANO, a.k.a. Cunado, and TOMAS SALINAS in Bronx County, for purpose of resale.

It was part of this conspiracy for ARGENIS GRULLON, a.k.a. Hanley to sell heroin to FRANCISCO MARTINEZ REYES, a.k.a. Viejo, REYMON RIVERA, a.k.a. Dioco, and LUIS MARTINEZ, a.k.a. Majimbe, in Bronx County.

It was part of this conspiracy for FRANCISCO MARTINEZ REYES, a.k.a. Viejo, to sell heroin to CARLOS ALMONTE, a.k.a. Luis Rivera, CARLOS HIERRO-MATA, JANDHEL RESTITUYO VASQUEZ, LUIS AUDE-MORA, MANUEL TORRES, a.k.a. Raul, and AMAURIS SANCHEZ in Bronx County, for resale in Suffolk County, and in Massachusetts.

It was part of this conspiracy for EDWIN NUNEZ SIERRA, a.k.a. La Papa, to assist FRANCISCO MARTINEZ REYES, a.k.a. Viejo, in his heroin sales to CARLOS ALMONTE,

a.k.a. Luis Rivera, CARLOS HIERRO-MATA, JANDHEL RESTITUYO VASQUEZ, LUIS AUDE-MORA, MANUEL TORRES, a.k.a. Raul, and AMAURIS SANCHEZ in Bronx County, for resale in Suffolk County, and in Massachusetts.

It was part of this conspiracy for JOSE RODRIGUEZ, a.k.a. Rafa to sell heroin to REYMON RIVERA, a.k.a. Dioco, in New York County, for resale in Bronx County, and in Massachusetts.

It was part of this conspiracy for MANUEL CASTILLANO, a.k.a. Cunado, to sell heroin to FRANCISCO MARTINEZ REYES, a.k.a. Viejo, REYMON RIVERA, a.k.a. Dioco, CARLOS ALMONTE, a.k.a. Luis Rivera, CARLOS HIERRO-MATA, JANDHEL RESTITUYO VASQUEZ, LUIS AUDE-MORA, and unindicted co-conspirator Nelfi Aude, for resale in Bronx County, Suffolk County, and in Massachusetts.

It was part of this conspiracy for HECTOR DIAZ, a.k.a. Shorty, to sell heroin for FRANCISCO MARTINEZ, a.k.a. Viejo, and REYMON RIVERA, a.k.a. Dioco, in Bronx County, and in Massachusetts.

It was part of this conspiracy for LUIS MARTINEZ, a.k.a. Majimbe to sell heroin for, FRANCISCO MARTINEZ REYES, a.k.a. Viejo, and REYMON RIVERA, a.k.a. Dioco, in Bronx County, and in Massachusetts.

It was part of this conspiracy for JUAN MIGUEL MARTE JAVIER to transport heroin for REYMON RIVERA, a.k.a. Dioco, from Bronx County to Massachusetts.

It was part of this conspiracy for YEIMY MATIAS to transport heroin for REYMON RIVERA, a.k.a. Dioco, from Bronx County to Massachusetts.

It was part of this conspiracy for RYAN MARTINEZ to purchase heroin from REYMON RIVERA, a.k.a. Dioco, in Bronx County, for resale in New Jersey.

It was part of this conspiracy for GISETTE HERNANDEZ, a.k.a. Neme, to sell heroin for REYMON RIVERA, a.k.a. Dioco, in New York County, and to assist in handling money from other sales in Bronx County, New York County, and elsewhere.

It was part of this conspiracy for DOMINGO PENA to sell heroin to LUIS AUDE-MORA and MANUEL TORRES, a.k.a. Raul, for resale in Suffolk County.

It was part of this conspiracy for CARLOS ALMONTE, a.k.a. Luis Rivera, to purchase heroin from FRANCISCO MARTINEZ REYES, a.k.a. Viejo, and REYMON RIVERA, a.k.a. Dioco, in Bronx County, and sell that heroin to LUIS AUDE-MORA, and unindicted co-conspirator Nelfi Aude, in Suffolk County.

It was part of this conspiracy for CARLOS HIERRO-MATA to purchase heroin from FRANCISCO MARTINEZ REYES, a.k.a. Viejo, and REYMON RIVERA, a.k.a. Dioco, in Bronx County, and sell that heroin to LUIS AUDE-MORA, and unindicted co-conspirator Nelfi Aude, in Suffolk County.

It was part of this conspiracy for JANDHEL RESTITUYO VASQUEZ to transport heroin from REYMON RIVERA, a.k.a. Dioco, in Bronx County, to CARLOS ALMONTE, a.k.a. Luis Rivera, and others in Massachusetts.

It was part of this conspiracy for LUIS AUDE-MORA and his brother, unindicted co-conspirator Nelfi Aude, to purchase heroin from CARLOS ALMONTE, a.k.a. Luis Rivera, and CARLOS HIERRO-MATA, to resell to AMAURIS SANCHEZ, MANUEL TORRES, a.k.a. Raul, and other resellers in Suffolk County.

It was part of this conspiracy for AMAURIS SANCHEZ to purchase heroin from LUIS AUDE-MORA, and unindicted co-conspirator Nelfi Aude, for resale in Suffolk County.

It was part of this conspiracy for MANUEL TORRES, a.k.a. Raul, to purchase heroin from LUIS AUDE-MORA, and unindicted co-conspirator Nelfi Aude, for resale in Suffolk County.

It was part of this conspiracy for OSCARHYL MARTINEZ AUDE to assist LUIS AUDE-MORA in his heroin sales in Suffolk County, by storing, hiding and disposing of drugs and money.

OVERT ACTS

In the furtherance of the conspiracy and to affect the objects thereof, from on or before approximately April 29, 2015, through on or about September 3, 2016, the following overt acts, among others, were committed:

1. On or about April 29, 2015, May, 21, 2015 and June, 29, 2016, AMAURIS SANCHEZ sold heroin to an individual whose identity is known to the Grand Jury.
2. On or about September 27, 2015, in a series of coded, guarded and cryptic telephone conversations, MANUEL TORRES, a.k.a. Raul, and unindicted co-conspirator Nelfi Aude, discuss meeting at TORRES' house in Suffolk County, to conduct a heroin transaction.
3. On or about November 29, 2015, in a series of coded, guarded and cryptic telephone conversations, LUIS AUDE-MORA and DOMINGO PENA discuss meeting at AUDE-MORA'S house in Suffolk County, to conduct a heroin transaction. On or about November 29, 2015, a surveillance team observes DOMINGO PENA arrive at LUIS AUDE-MORA'S residence.
4. On or about and between January 10, 2016, and January 11, 2016, in a series of coded, guarded and cryptic telephone conversations CARLOS ALMONTE, a.k.a. Luis Rivera, CARLOS HIERRO-MATA and JANDHEL RESTITUYO VASQUEZ make arrangements for

VASQUEZ to transport a quantity of heroin to from Bronx County to Massachusetts. On or about January 11, 2016, JANDHEL RESTITUYO VASQUEZ, while travelling in a motor vehicle from Bronx County, to Worcester, Massachusetts, possessed one or more preparations, compounds, mixtures or substances containing an aggregate weight of eight ounces or more of the narcotic drug heroin.

5. On or about January 28, 2016, LUIS AUDE-MORA, and unindicted co-conspirator Nelfi Aude, while travelling by car from Bronx County to Suffolk County, possessed one or more preparations, compounds, mixtures or substances containing an aggregate weight of eight ounces or more of the narcotic drug fentanyl.

6. On or about January 28, 2016, in a series of coded, guarded and cryptic telephone conversations LUIS AUDE-MORA instructed OSCARHYL MARTINEZ AUDE to dispose of drugs and drug paraphernalia in their home, to which OSCARHYL MARTINEZ AUDE agreed.

7. On or about February 5, 2016, in a series of coded, guarded and cryptic telephone conversations ARGENIS GRULLON, a.k.a. Hanley, and two unindicted co-conspirators arranged to meet to conduct a heroin transaction.

8. On or about March 15, 2016, in a series of coded, guarded and cryptic telephone conversations MANUEL CASTILLANO, a.k.a. Cunado, TOMAS SALINAS and CARLOS ALBERTO BORGES PEREZ arranged for SALINAS to deliver a quantity of heroin to PEREZ. On or about March 15, 2016, CARLOS ALBERTO BORGES PEREZ, while travelling by car through Bronx County, possessed one or more preparations, compounds, mixtures or substances containing an aggregate weight of eight ounces or more of the narcotic drug heroin. On or about April 28, 2016, in a series of coded, guarded and cryptic telephone conversations DANIEL

ABASCAL PENA and MANUEL CASTILLANO, a.k.a. Cunado, discussed the money that CASTILLANO owed for the drugs that were seized on March 15, 2016.

9. On or about April 17, 2016, in a telephone conversation MANUEL AMPARO, a.k.a. Cacu, made plans for an unindicted co-conspirator to travel from Bronx County to Lawrence Massachusetts in a public transit van. On or about April 17, 2016, in a series of coded, guarded and cryptic telephone conversations MANUEL AMPARO a.k.a. Cacu, and the unindicted co-conspirator discuss how the police had just stopped the public transit van that the unindicted co-conspirator was traveling in and seized a quantity of heroin that the unindicted co-conspirator had been carrying for AMPARO.

10. On or about May 24, 2016, in a series of coded, guarded and cryptic telephone conversations REYMON RIVERA, a.k.a. Dioco, and LUIS MARTINEZ, a.k.a. Majimbe, discuss having MARTINEZ meet an unindicted co-conspirator to receive a quantity of heroin. On or about May 24, 2016, LUIS MARTINEZ, a.k.a. Majimbe, while travelling by car through Bronx County, possessed one or more preparations, compounds, mixtures or substances containing an aggregate weight of four ounces or more of the narcotic drug heroin.

11. On or about May 24, 2016, in a telephone conversation FRANCISCO MARTINEZ REYES, a.k.a. Viejo, and EDWIN NUNEZ SIERRA, a.k.a. La Papa, instructed HECTOR DIAZ, a.k.a. Shorty, to pick up a quantity of heroin from an unknown co-conspirator. On or about May 24, 2016, while walking upon a sidewalk in Bronx County, HECTOR DIAZ, a.k.a. Shorty, possessed one or more preparations, compounds, mixtures or substances containing an aggregate weight of eight ounces or more of the narcotic drug heroin.

12. On or about June 17, 2016, YEIMY MATIAS, while travelling by motor vehicle through Westchester County, possessed one or more preparations, compounds, mixtures or substances containing an aggregate weight of eight ounces or more of the narcotic drug fentanyl.

13. On or about July 15, 2016, FERNANDO SUERO, in Bronx County, possessed one or more preparations, compounds, mixtures or substances containing an aggregate weight of eight ounces or more of the narcotic drug heroin.

14. On or about July 17, 2016, in a series of coded, guarded and cryptic telephone conversations REYMON RIVERA, a.k.a. Dioco, RYAN MARTINEZ, and GINETTE HERNANDEZ arranged for MARTINEZ to pick up a quantity of heroin from HERNANDEZ in New York County.

15. On or about and between August 26, 2016, and September 3, 2016, in a series of coded, guarded and cryptic telephone conversations REYMON RIVERA, a.k.a. Dioco, JOSE RODRIGUEZ, a.k.a. Rafa, and JUAN MIGUEL MARTE JAVIER arranged for RIVERA to meet with JAVIER in New York County to conduct a heroin transaction. On or about September 3, 2016, JUAN MARTE JAVIER, while travelling by car through New York County, possessed one or more preparations, compounds, mixtures or substances containing an aggregate weight of eight ounces or more of the narcotic drug heroin.

COUNT TWO

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

Said defendant, from on or about March 15, 2016 until on or about July 15, 2016, in Bronx County, and elsewhere within and outside of the State of New York, acting as a profiteer, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell the same, and such narcotic drugs had a total aggregate value of seventy-five thousand dollars or more.

COUNT THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, **ARGENIS GRULLON, a.k.a. Hanley**, of the crime of **OPERATING AS A MAJOR TRAFFICKER** in violation of §220.77(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, from on or about December 22, 2015 until on or about June 10, 2016, in Bronx County, and elsewhere within and outside of the State of New York, acting as a profiteer, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell the same, and such narcotic drugs had a total aggregate value of seventy-five thousand dollars or more.

COUNT FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, **FRANCISCO MARTINEZ REYES, a.k.a. Viejo**, of the crime of **OPERATING AS A MAJOR TRAFFICKER** in violation of §220.77(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, from on or about March 29, 2016 until on or about May 24, 2016, in Bronx County, and elsewhere within and outside of the State of New York, acting as a profiteer,

knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell the same, and such narcotic drugs had a total aggregate value of seventy-five thousand dollars or more.

COUNT FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, **EDWIN NUNEZ SIERRA, a.k.a. La Papa**, of the crime of **OPERATING AS A MAJOR TRAFFICKER** in violation of §220.77(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, from on or about December 27, 2015 until on or about May 24, 2016, in Bronx County, and elsewhere within and outside of the State of New York, acting as a profiteer, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell the same, and such narcotic drugs had a total aggregate value of seventy-five thousand dollars or more.

COUNT SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, **REYMON RIVERA-ORTIZ, a.k.a. Dioco**, of the crime of **OPERATING AS A MAJOR TRAFFICKER** in violation of §220.77(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, from on or about March 29, 2016 until on or about September 5, 2016, in Bronx County, and elsewhere within and outside of the State of New York, acting as a profiteer, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell the same, and such narcotic drugs had a total aggregate value of seventy-five thousand dollars or more.

COUNT SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, **CARLOS ALMONTE, a.k.a. Luis Rivera**, of the crime of **OPERATING AS A MAJOR TRAFFICKER** in violation of §220.77(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, from on or about January 10, 2016 until on or about March 30, 2016, in Bronx County, and elsewhere within and outside of the State of New York, acting as a profiteer, knowingly and unlawfully possessed a narcotic drug, to wit, heroin and fentanyl, with intent to sell the same, and such narcotic drugs had a total aggregate value of seventy-five thousand dollars or more.

COUNT EIGHT

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

Said defendant, from on or about January 10, 2016 until on or about March 30, 2016, in Bronx County, and elsewhere within and outside of the State of New York, acting as a profiteer, knowingly and unlawfully possessed a narcotic drug, to wit, heroin and fentanyl, with intent to sell the same, and such narcotic drugs had a total aggregate value of seventy-five thousand dollars or more.

COUNT NINE

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

Said defendant, from on or about September 21, 2015 until on or about January 28, 2016, in Bronx County, and elsewhere within and outside of the State of New York, acting as a profiteer, knowingly and unlawfully possessed a narcotic drug, to wit, heroin and fentanyl, with intent to sell the same, and such narcotic drugs had a total aggregate value of seventy-five thousand dollars or more.

COUNT TEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **LUIS AUDE-MORA, CARLOS HIERRO-MATA, CARLOS ALMONTE, a.k.a. Luis Rivera, and OSCARHYL MARTINEZ AUDE**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about the 28th day of January, 2016, in the County of Bronx, knowingly and unlawfully sold 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 two ounces or more.

COUNT ELEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **LUIS AUDE-MORA, CARLOS HIERRO-MATA, CARLOS ALMONTE, a.k.a. Luis Rivera, and OSCARHYL MARTINEZ AUDE**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about the 28th day of January, 2016, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, Fentanyl.

COUNT TWELVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **LUIS AUDE-MORA, CARLOS HIERRO-MATA, CARLOS ALMONTE, a.k.a. Luis Rivera, and OSCARHYL MARTINEZ AUDE**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of §220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about the 28th day of January, 2016, in the County of Bronx, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

COUNT THIRTEEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **LUIS AUDE-MORA, CARLOS HIERRO-MATA, CARLOS ALMONTE, a.k.a. Luis Rivera, and OSCARHYL MARTINEZ AUDE**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about the 28th day of January, 2016, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, Fentanyl, with intent to sell it.

COUNT FOURTEEN

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

Said defendant, and unindicted co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about and between the 23rd day of July, 2015, and the 24th day of July, 2015, in the County of Suffolk, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT FIFTEEN

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

Said defendant, and unindicted co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about and between the 23rd day of July, 2015, and the 24th day of July, 2015, in the County of Suffolk, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SIXTEEN

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

Said defendant, and unindicted co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about and between the 23rd day of July, 2015, and the 24th day of July, 2015, in the County of Suffolk, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SEVENTEEN

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

CONTROLLED SUBSTANCE IN THE FIRST DEGREE in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, and unindicted co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about the 19th day of October, 2015, in the County of Suffolk, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT EIGHTEEN

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

Said defendant, and unindicted co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about the 19th day of October, 2015, in the County of Suffolk, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT NINETEEN

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

Said defendant, and unindicted co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about the 19th day of October, 2015, in the County of Suffolk, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWENTY

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

Said defendant, on or about the 29th day of April, 2015, in the County of Suffolk, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT TWENTY-ONE

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

Said defendant, on or about the 29th day of April, 2015, in the County of Suffolk, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWENTY-TWO

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

Said defendant, on or about the 29th day of April, 2015, in the County of Suffolk, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWENTY-THREE

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

Said defendant, on or about the 21st day of May, 2015, in the County of Suffolk, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT TWENTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, **AMARIS SANCHEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §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 May, 2015, in the County of Suffolk, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWENTY-FIVE

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

Said defendant, on or about the 21st day of May, 2015, in the County of Suffolk, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWENTY-SIX

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

Said defendant, on or about the 29th day of June, 2015, in the County of Suffolk, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT TWENTY-SEVEN

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

Said defendant, on or about the 29th day of June, 2015, in the County of Suffolk, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWENTY-EIGHT

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

Said defendant, on or about the 29th day of June, 2015, in the County of Suffolk, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWENTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **LUIS AUDE-MORA and DOMINGO PENA**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about and between the 18th day of December, 2015, and the 20th day of

December, 2015, in the County of Suffolk, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THIRTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **LUIS AUDE-MORA and DOMINGO PENA**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about and between the 18th day of December, 2015, and the 20th day of December, 2015, in the County of Suffolk, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THIRTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **LUIS AUDE-MORA, DOMINGO PENA and MANUEL TORRES, a.k.a. Raul**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about the 29th day of November, 2015, in the County of Suffolk, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THIRTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **LUIS AUDE-MORA, DOMINGO PENA and MANUEL TORRES, a.k.a. Raul**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about the 29th day of November, 2015, in the County of Suffolk, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THIRTY-THREE

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

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about and between the 9th day of September, 2015, and the 10th day of September, 2015, in the County of Suffolk, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THIRTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **MANUEL TORRES, a.k.a. Raul**, of the crime of **CRIMINAL POSSESSION**

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

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about and between the 9th day of September, 2015, and the 10th day of September, 2015, in the County of Suffolk, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THIRTY-FIVE

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

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about and between the 21st day of September, 2015, and the 23rd day of September, 2015, in the County of Suffolk, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THIRTY-SIX

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

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about and between the 21st day of September, 2015, and the 23rd day of September, 2015, in the County of Suffolk, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THIRTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **MANUEL TORRES, a.k.a. Raul**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about and between the 2nd day of October, 2015, and the 3rd day of October, 2015, in the County of Suffolk, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THIRTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **MANUEL TORRES, a.k.a. Raul**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about and between the 2nd day of October, 2015, and the 3rd day of

October, 2015, in the County of Suffolk, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THIRTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **FRANCISCO MARTINEZ-REYES, a.k.a. Viejo, REYMON RIVERA, a.k.a. Dioco, CARLOS ALMONTE, a.k.a. Luis Rivera, CARLOS HIERRO-MATA, LUIS AUDE-MORA, AMAURIS SANCHEZ, and MANUEL TORRES, a.k.a. Raul**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about and between the 21st day of September, 2015, and the 30th day of September, 2015, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FORTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **FRANCISCO MARTINEZ-REYES, a.k.a. Viejo, REYMON RIVERA, a.k.a. Dioco, CARLOS ALMONTE, a.k.a. Luis Rivera, CARLOS HIERRO-MATA, LUIS AUDE-MORA, AMAURIS SANCHEZ, and MANUEL TORRES, a.k.a. Raul**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, and unindicated co-conspirator Nelfi Aude, each aiding the other and acting in concert, on or about and between the 21st day of September, 2015, and the 30th day of September, 2015, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FORTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **CARLOS HIERRO-MATA, CARLOS ALMONTE, a.k.a. Luis Rivera, and JANDHEL RESTITUYO VASQUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 10th day of January, 2016, and the 11th day of January, 2016, in the County of Bronx, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT FORTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **CARLOS HIERRO-MATA, CARLOS ALMONTE, a.k.a. Luis Rivera, and JANDHEL RESTITUYO VASQUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 10th day of January, 2016, and the 11th day of January, 2016, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FORTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **CARLOS HIERRO-MATA, CARLOS ALMONTE, a.k.a. Luis Rivera, and JANDHEL RESTITUYO VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of §220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 10th day of January, 2016, and the 11th day of January, 2016, in the County of Bronx, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

COUNT FORTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **CARLOS HIERRO-MATA, CARLOS ALMONTE, a.k.a. Luis Rivera, and JANDHEL RESTITUYO VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 10th day of January, 2016, and the 11th day of January, 2016, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FORTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **EDWIN NUNEZ SIERRA, a.k.a. La Papa, REYMON RIVERA, a.k.a. Dioco, FRANCISCO MARTINEZ REYES, a.k.a. Viejo, CARLOS HIERRO-MATA, CARLOS ALMONTE, a.k.a. Luis Rivera, and JANDHEL RESTITUYO VASQUEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 29th day of March, 2016, and the 30th day of March, 2016, in the County of Bronx, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT FORTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **EDWIN NUNEZ SIERRA, a.k.a. La Papa, REYMON RIVERA, a.k.a. Dioco, FRANCISCO MARTINEZ REYES, a.k.a. Viejo, CARLOS HIERRO-MATA, CARLOS ALMONTE, a.k.a. Luis Rivera, and JANDHEL RESTITUYO VASQUEZ**, of the crime of

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

Said defendants, each aiding the other and acting in concert, on or about and between the 29th day of March, 2016, and the 30th day of March, 2016, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FORTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **EDWIN NUNEZ SIERRA, a.k.a. La Papa, REYMON RIVERA, a.k.a. Dioco, FRANCISCO MARTINEZ REYES, a.k.a. Viejo, CARLOS HIERRO-MATA, CARLOS ALMONTE, a.k.a. Luis Rivera, and JANDHEL RESTITUYO VASQUEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of §220.18(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 29th day of March, 2016, and the 30th day of March, 2016, in the County of Bronx, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

COUNT FORTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **EDWIN NUNEZ SIERRA, a.k.a. La Papa, REYMON RIVERA, a.k.a. Dioco,**

FRANCISCO MARTINEZ REYES, a.k.a. Viejo, CARLOS HIERRO-MATA, CARLOS ALMONTE, a.k.a. Luis Rivera, and JANDHEL RESTITUYO VASQUEZ, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 29th day of March, 2016, and the 30th day of March, 2016, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FORTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, and YEIMY MATIAS,** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 17th day of June, 2016, in the County of Bronx, knowingly and unlawfully sold 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 two ounces or more.

COUNT FIFTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, and YEIMY MATIAS,** of the crime of

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

Said defendants, each aiding the other and acting in concert, on or about the 17th day of June, 2016, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, fentanyl.

COUNT FIFTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, and YEIMY MATIAS**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of §220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 17th day of June, 2016, in the County of Bronx, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

COUNT FIFTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, and YEIMY MATIAS**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD**

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

Said defendants, each aiding the other and acting in concert, on or about the 17th day of June, 2016, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, fentanyl, with intent to sell it.

COUNT FIFTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, LUIS MARTINEZ, a.k.a. Majimbe, and GISETTE HERNANDEZ, a.k.a Neme**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 26th day of December, 2015, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FIFTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, LUIS MARTINEZ, a.k.a. Majimbe, and GISETTE HERNANDEZ, a.k.a Neme**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 26th day of December, 2015, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FIFTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, EDWIN NUNEZ SIERRA, a.k.a. La Papa, and GISETTE HERNANDEZ, a.k.a Neme**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 27th day of December, 2015, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FIFTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, EDWIN NUNEZ SIERRA, a.k.a. La Papa, and GISETTE HERNANDEZ, a.k.a Neme**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 27th day of December, 2015, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FIFTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **EDWIN NUNEZ SIERRA, a.k.a. La Papa, HECTOR DIAZ, a.k.a. Shorty, and FRANCISCO MARTINEZ REYES, a.k.a. Viejo**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 24th day of May, 2015, in the County of Bronx, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT FIFTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **EDWIN NUNEZ SIERRA, a.k.a. La Papa, HECTOR DIAZ, a.k.a. Shorty, and FRANCISCO MARTINEZ REYES, a.k.a. Viejo**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 24th day of May, 2015, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FIFTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **EDWIN NUNEZ SIERRA, a.k.a. La Papa, HECTOR DIAZ, a.k.a. Shorty, and FRANCISCO MARTINEZ REYES, a.k.a. Viejo**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of §220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 24th day of May, 2015, in the County of Bronx, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

COUNT SIXTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **EDWIN NUNEZ SIERRA, a.k.a. La Papa, HECTOR DIAZ, a.k.a. Shorty, and FRANCISCO MARTINEZ REYES, a.k.a. Viejo**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 24th day of May, 2015, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SIXTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **DANIEL ABASCAL PENA and FERNANDO SUERO**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 25th day of February, 2016, and the 15th day of July, 2016, in the County of Bronx, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT SIXTY-TWO

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

Said defendants, each aiding the other and acting in concert, on or about and between the 25th day of February, 2016, and the 15th day of July, 2016, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SIXTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **DANIEL ABASCAL PENA and FERNANDO SUERO**, of the crime of

CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE in violation of §220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 25th day of February, 2016, and the 15th day of July, 2016, in the County of Bronx, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

COUNT SIXTY-FOUR

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

Said defendants, each aiding the other and acting in concert, on or about and between the 25th day of February, 2016, and the 15th day of July, 2016, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SIXTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **MANUEL CASTILLANO, a.k.a. Cunado, TOMAS SALINAS, CARLOS BORGES PEREZ, and DANIEL ABASCAL PENA**, of the crime of **CRIMINAL SALE OF**

A CONTROLLED SUBSTANCE IN THE FIRST DEGREE in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 15th day of March, 2016, and the 29th day of April, 2016, in the County of Bronx, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT SIXTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **MANUEL CASTILLANO, a.k.a. Cunado, TOMAS SALINAS, CARLOS BORGES PEREZ, and DANIEL ABASCAL PENA**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 15th day of March, 2016, and the 29th day of April, 2016, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SIXTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **MANUEL CASTILLANO, a.k.a. Cunado, TOMAS SALINAS, CARLOS BORGES PEREZ, and DANIEL ABASCAL PENA**, of the crime of **CRIMINAL**

POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE in violation of §220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 15th day of March, 2016, and the 29th day of April, 2016, in the County of Bronx, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, 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, **MANUEL CASTILLANO, a.k.a. Cunado, TOMAS SALINAS, CARLOS BORGES PEREZ, and DANIEL ABASCAL PENA**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 15th day of March, 2016, and the 29th day of April, 2016, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SIXTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **MANUEL CASTILLANO, a.k.a. Cunado, REYMON RIVERA, a.k.a. Dioco, LUIS MARTINEZ, a.k.a. Majimbe, TOMAS SALINAS, and CARLOS HIERRO-MATA**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD**

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

Said defendants, each aiding the other and acting in concert, on or about and between the 24th day of February, 2016, and the 29th day of February, 2016, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SEVENTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **MANUEL CASTILLANO, a.k.a. Cunado, REYMON RIVERA, a.k.a. Dioco, LUIS MARTINEZ, a.k.a. Majimbe, TOMAS SALINAS, and CARLOS HIERRO-MATA,** of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 24th day of February, 2016, and the 29th day of February, 2016, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SEVENTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **MANUEL CASTILLANO, a.k.a. Cunado, and TOMAS SALINAS,** of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 9th day of March, 2016, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SEVENTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **MANUEL CASTILLANO, a.k.a. Cunado, and TOMAS SALINAS**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 9th day of March, 2016, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SEVENTY-THREE

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

Said defendant, and an unindicted co-conspirator, each aiding the other and acting in concert, on or about the 17th day of April, 2016, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SEVENTY-FOUR

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

Said defendant, and an unindicted co-conspirator, each aiding the other and acting in concert, on or about the 17th day of April, 2016, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SEVENTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **ARGENIS GRULLON, a.k.a Hanley, REYMON RIVERA, a.k.a. Dioco, and LUIS MARTINEZ, Majimbe**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 24th day of May, 2016, in the County of Bronx, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT SEVENTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **ARGENIS GRULLON, a.k.a Hanley, REYMON RIVERA, a.k.a. Dioco, and LUIS MARTINEZ, Majimbe**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 24th day of May, 2016, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SEVENTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **ARGENIS GRULLON, a.k.a Hanley, REYMON RIVERA, a.k.a. Dioco, and LUIS MARTINEZ, Majimbe**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of §220.18(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 24th day of May, 2016, in the County of Bronx, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

COUNT SEVENTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **ARGENIS GRULLON, a.k.a Hanley, REYMON RIVERA, a.k.a. Dioco, and LUIS MARTINEZ, Majimbe**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 24th day of May, 2016, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SEVENTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, **ARGENIS GRULLON, a.k.a. Hanley**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, and unindicted co-conspirators, each aiding the other and acting in concert, on or about the 22nd day of December, 2015, and the 5th day of February, 2016, in the County of Passaic, New Jersey, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT EIGHTY

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

Said defendant, and unindicted co-conspirators, each aiding the other and acting in concert, on or about the 22nd day of December, 2015, and the 5th day of February, 2016, in the County of Passaic, New Jersey, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT EIGHTY-ONE

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

Said defendant, and unindicted co-conspirators, each aiding the other and acting in concert, on or about the 22nd day of December, 2015, and the 5th day of February, 2016, in the County of Passaic, New Jersey, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

COUNT EIGHTY-TWO

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

Said defendant, and unindicted co-conspirators, each aiding the other and acting in concert, on or about the 22nd day of December, 2015, and the 5th day of February, 2016, in the County of Passaic, New Jersey, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT EIGHTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **ARGENIS GRULLON, a.k.a. Hanley**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, and an unindicted co-conspirator, each aiding the other and acting in concert, on or about the 19th day of March, 2016, in the County of Bronx, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT EIGHTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **ARGENIS GRULLON, a.k.a. Hanley**, of the crime of **CRIMINAL**

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

Said defendant, and an unindicted co-conspirator, each aiding the other and acting in concert, on or about the 19th day of March, 2016, in the County of Bronx, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT EIGHTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **ARGENIS GRULLON a.k.a. Hanley, REYMON RIVERA, a.k.a. Dioco, and LUIS MARTINEZ, a.k.a. Majimbe**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 4th day of June, 2016, and the 10th day of June, 2016, in the County of New York, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT EIGHTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **ARGENIS GRULLON a.k.a. Hanley, REYMON RIVERA, a.k.a. Dioco, and LUIS MARTINEZ, a.k.a. Majimbe**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 4th day of June, 2016, and the 10th day of June, 2016, in the County of New York, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT EIGHTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **MANUEL CASTILLANO, a.k.a. Cunado, REYMON RIVERA, a.k.a. Dioco, and LUIS MARTINEZ, a.k.a. Majimbe**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 6th day of February, 2016, and the 7th day of February, 2016, in the County of New York, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT EIGHTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **MANUEL CASTILLANO, a.k.a. Cunado, REYMON RIVERA, a.k.a. Dioco, and LUIS MARTINEZ, a.k.a. Majimbe**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 6th day of February, 2016, and the 7th day of February, 2016, in the County of New York, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT EIGHTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, and RYAN MARTINEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 18th day of June, 2016, and the 24th day of June, 2016, in the County of New York, knowingly and unlawfully sold a narcotic drug, to wit, Heroin.

COUNT NINETY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, and RYAN MARTINEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 18th day of June, 2016, and the 24th day of June, 2016, in the County of New York, knowingly and unlawfully possessed a narcotic drug, to wit, Heroin, with intent to sell it.

COUNT NINETY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, RYAN MARTINEZ, and GISETTE**

HERNANDEZ, a.k.a. Neme, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 17th day of July, 2016, in the County of New York, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT NINETY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, RYAN MARTINEZ, and GISETTE HERNANDEZ, a.k.a. Neme**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 17th day of July, 2016, in the County of New York, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT NINETY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, and RYAN MARTINEZ**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 24th day of August, 2016, and the 28th day of August, 2016, in the County of New York, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT NINETY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, and RYAN MARTINEZ**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about and between the 24th day of August, 2016, and the 28th day of August, 2016, in the County of New York, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT NINETY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, JOSE RODRIGUEZ, a.k.a. Rafa, and JUAN MIGUEL MARTE JAVIER**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 26th day of August, 2016, and the 5th day of September, 2016, in the County of New York, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a

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

COUNT NINETY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, JOSE RODRIGUEZ, a.k.a. Rafa, and JUAN MIGUEL MARTE JAVIER**, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 26th day of August, 2016, and the 5th day of September, 2016, in the County of New York, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT NINETY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, JOSE RODRIGUEZ, a.k.a. Rafa, and JUAN MIGUEL MARTE JAVIER**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of §220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about the 26th day of August, 2016, and the 5th day of September, 2016, in the County of New York, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a

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

COUNT NINETY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, **REYMON RIVERA, a.k.a. Dioco, JOSE RODRIGUEZ, a.k.a. Rafa, and JUAN MIGUEL MARTE JAVIER**, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

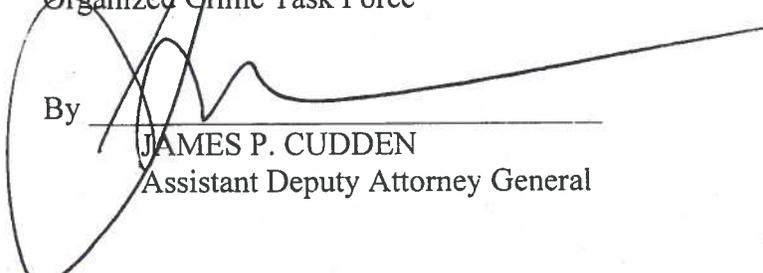
Said defendants, each aiding the other and acting in concert, on or about the 26th day of August, 2016, and the 5th day of September, 2016, in the County of New York, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

ORIGINAL

Dated: September 19, 2016
Bronx, New York

PERI ALYSE KADANOFF
Deputy Attorney General
Organized Crime Task Force

By



JAMES P. CUDDEN
Assistant Deputy Attorney General

A TRUE BILL



GRAND JURY FOREPERSON
Dated: September 19, 2016