

STATE OF NEW YORK  
COUNTY COURT: COUNTY OF SARATOGA

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THE PEOPLE OF THE STATE OF NEW YORK

-vs-

SEALED INDICTMENT

PAMELA BACKUS,  
JORDAN BLOUNT,  
ANGEL BRACERO-ORTIZ,  
OMAR CHILDRESS,  
UNIKIA CROSS,  
JAMES DAGGETT,  
SHAWN DELMORE,  
ERICA DUBRAY,  
NANCY DUKES,  
JAMES EGGLESTON,  
LACY ENOUS, A/K/A "RED,"  
NOELIA FUENTES,  
DAVID GARCIA,  
DOROTHY GETHERS, A/K/A "BRENDA,"  
KIMBERLY GOODSON,  
DEAN HARLAN,  
RICHARD HENDERSON,  
CARLOS HERNANDEZ,  
CLARENCE JACKSON,  
ADRIAN KELLEY, A/K/A "ACE,"  
DEBORAH LATALLADI,  
ERINA LEMPERLE,  
CRYSTAL LEO,  
AMANDA LOVELY-LAMARCHE,  
WILLIAM MAYS,  
ZOOLEIKA MENDEZ,  
FRANKIE MERCADO,  
JOSEPH MEUNIER,  
SHALENA MURRAY, A/K/A "SHAY,"  
DAMIR PARSONS,  
MATTATHIAS PARSONS,  
ADRIANE PIERCE,  
NICOLE RICH,  
ALEXANDER RIVERA,  
PATRICK ROBINSON,  
LUIS ROSA,  
FRANK SAWYER,  
YVONNE SMITH,

JANESSA SOTO,  
NICOLE STRAINER,  
PHILLIP TAYLOR,  
DONALD THOMAS,  
SHARROD THORTON,  
SHETWANA VENABLE,  
DRANAE WASHINGTON,  
ERIC WILLIAMS,  
LAMONT WILLIAMS,  
ELRAHIM WRIGHT.

Defendants.

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COUNT 1

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, accuses the defendants, PAMELA BACKUS, JORDAN BLOUNT, ANGEL BRACERO-ORTIZ, OMAR CHILDRESS, UNIKIA CROSS, JAMES DAGGETT, SHAWN DELMORE, ERICA DUBRAY, NANCY DUKES, JAMES EGGLESTON, LACY ENOUS, A/K/A “RED,” NOELIA FUENTES, DAVID GARCIA, DOROTHY GETHERS, A/K/A “BRENDA,” KIMBERLY GOODSON, DEAN HARLAN, RICHARD HENDERSON, CARLOS HERNANDEZ, CLARENCE JACKSON, ADRIAN KELLEY, A/K/A “ACE,” DEBORAH LATALLADI, ERINA LEMPERLE, CRYSTAL LEO, AMANDA LOVELY-LAMARCHE, WILLIAM MAYS, ZOOLEIKA MENDEZ, FRANKIE MERCADO, JOSEPH MEUNIER, SHALENA MURRAY, A/K/A “SHAY,” DAMIR PARSONS, MATTATHIAS PARSONS, ADRIANE PIERCE, NICOLE RICH, ALEXANDER RIVERA, PATRICK ROBINSON, LOUIS ROSA, FRANK SAWYER, YVONNE SMITH, JANESSA SOTO, NICOLE STRAINER, PHILIP TAYLOR, DONALD THOMAS, SHARROD THORTON, SHETWANA VENABLE, DRANAE WASHINGTON, ERIC WILLIAMS, LAMONT WILLIAMS and ELRAHIM WRIGHT, 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:

That the said defendants, in Albany County, Bronx County, Rensselaer County, Saratoga

County, Schenectady County, Warren County and elsewhere in the State of New York, from on or before May 2, 2019, until on or about May 1, 2020, with intent that conduct constituting the crimes of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, in violation of Section 220.43(1) of the Penal Law of the State of New York, and/or 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, 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 and/or 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, said crimes being class A Felonies, be committed, did knowingly and unlawfully agree with each other and with others, known and unknown, to engage in and cause the performance of such conduct as would constitute any one or more of the above-mentioned class A felonies.

### **PREAMBLE**

It was the purpose of this conspiracy to obtain, possess and control quantities of narcotics in amounts greater than eight ounces or more, and to sell narcotics in amounts greater than two ounces or more in Albany County, Bronx County, Rensselaer County, Saratoga County, Schenectady County, Warren County and elsewhere in and outside of the State of New York, and to collect the proceeds from those narcotics transactions.

It was also part of this conspiracy for DONALD THOMAS and SHARROD THORTON to sell cocaine, up to kilograms at a time, in Bronx County to CLARENCE JACKSON, SHAWN DELMORE, RICHARD HERNDERSON, CARLOS HERNANDEZ, FRANKIE MERCADO, DOROTHY GETHERS, A/K/A "BRENDA," LAMONT WILLIAMS, and others.

It was also part of this conspiracy for CLARENCE JACKSON, SHAWN DELMORE, RICHARD HERNDERSON, CARLOS HERNANDEZ, FRANKIE MERCADO, DOROTHY GETHERS, A/K/A "BRENDA," and LAMONT WILLIAMS to obtain cocaine from DONALD THOMAS and/or SHARROD THORTON to sell to others.

It was also part of this conspiracy for ALEXANDER RIVERA to purchase cocaine from FRANKIE MERCADO to sell to others.

It was also part of this conspiracy for DEBORAH LATALLADI to purchase narcotic drugs from LACY ENOUS, A/K/A "RED," WILLIAM MAYS, SHALENA MURRAY, A/K/A "SHAY," CLARENCE JACKSON, DAVID GARCIA and KIMBERLY GOODSON to sell to PAMELA BACKUS, and others.

It was also part of this conspiracy for DEBORAH LATALLADI to purchase prescription pills from LACY ENOUS, A/K/A "RED," WILLIAM MAYS, SHALENA MURRAY, A/K/A "SHAY," ZOOLEIKA MENDEZ, ANGEL BRACERO-ORTIZ, and CLARENCE JACKSON to sell to PAMELA BACKUS, NICOLE RICH, and others.

It was also part of this conspiracy for PAMELA BACKUS and NICOLE RICH to obtain narcotic drugs and/or prescription pills from DEBORAH LATALLADI to sell to others and to sell prescription pills to DEBORAH LATALLADI.

It was also part of this conspiracy for LACY ENOUS, A/K/A "RED," to sell narcotic drugs to JAMES DAGGETT, ADRIAN KELLEY, A/K/A "ACE," AMANDA LOVELY-LAMARCHE, JAMES EGGLESTON, CLARENCE JACKSON, DEBORAH LATALLADI and others.

It was also part of this conspiracy for JAMES DAGGETT, AMANDA LOVELY-LAMARCHE, JAMES EGGLESTON, and CLARENCE JACKSON, to obtain narcotic drugs from LACY ENOUS, A/K/A "RED," to sell to others.

It was also part of this conspiracy for LUIS ROSA to sell narcotic drugs to LACY ENOUS, A/K/A “RED.”

It was also part of this conspiracy for WILLIAM MAYS to sell cocaine to JORDAN BLOUNT, UNIKIA CROSS, NOELIA FUENTES, DEBORAH LATALLADI, CRYSTAL LEO, PATRICK ROBINSON, YVONNE SMITH, PHILLIP TAYLOR, SHETWANA VENABLE, and others.

It was also part of this conspiracy for JORDAN BLOUNT, UNIKIA CROSS, NOELIA FUENTES, CRYSTAL LEO, PATRICK ROBINSON, YVONNE SMITH, PHILLIP TAYLOR, and SHETWANA VENABLE, to obtain cocaine from WILLIAM MAYS to sell to others.

It was also part of this conspiracy for SHALENA MURRAY, A/K/A “SHAY,” to sell cocaine to JOSEPH MEUNIER, DEBORAH LATALLADI, and others.

It was also part of this conspiracy for JOSEPH MEUNIER to obtain cocaine from SHALENA MURRAY, A/K/A “SHAY,” to sell to others.

It was also part of this conspiracy for ZOOLEIKA MENDEZ and ANGEL BRACERO-ORTIZ to sell prescription pills to DEBORAH LATALLADI.

It was also part of this conspiracy for MATTAHIAS PARSONS and ERIC WILLIAMS to sell cocaine to LACY ENOUS A/K/A “RED,” ADRIAN KELLEY, A/K/A “ACE,” DAMIR PARSONS, DRANAE WASHINGTON, ERINA LEMPERLE, OMAR CHILDRESS, and others.

It was also part of this conspiracy for DAMIR PARSONS, DRANAE WASHINGTON, ERINA LEMPERLE, and OMAR CHILDRESS, to obtain cocaine from MATTAHIAS PARSONS and/or ERIC WILLIAMS to sell to others.

It was also part of this conspiracy for ADRIAN KELLEY, A/K/A “ACE,” to obtain narcotic drugs from LACY ENOUS A/K/A “RED,” MATTAHIAS PARSONS and ERIC WILLIAMS, to sell to others.

It was also part of this conspiracy for ELRAHIM WRIGHT to sell narcotic drugs to LACY ENOUS, A/K/A “RED,” ADRIANE PIERCE, and others.

It was also part of this conspiracy for ADRIANE PIERCE to sell narcotic drugs to ERICA DUBRAY, NANCY DUKES, DEAN HARLAN, FRANK SAWYER, JANESEA SOTO, NICOLE STRAINER, and others.

It was also part of this conspiracy for ERICA DUBRAY, NANCY DUKES, DEAN HARLAN, FRANK SAWYER, JANESEA SOTO, and NICOLE STRAINER, to obtain narcotic drugs from ADRIANE PIERCE to sell to others.

It was also part of this conspiracy for DAVID GARCIA and KIMBERLY GOODSON to sell narcotic drugs to DEBORAH LATALLADI.

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 furtherance of the conspiracy and to affect the objects thereof, from on or before May 2, 2019, until on or about May 1, 2020, the following overt acts, among others, were committed:

1. On or about May 2, 2019, DEBORAH LATALLADI sold heroin in Saratoga County to a person known to the Grand Jury.
2. On or about June 21, 2019, DEBORAH LATALLADI and LACY ENOUS, A/K/A “RED,” acting in concert, sold fentanyl in Saratoga County to a person known to the Grand Jury.
3. On or about July 17, 2019, DEBORAH LATALLADI and LACY ENOUS, A/K/A “RED,” acting in concert, sold fentanyl in Saratoga County to a person known to the Grand Jury.
4. On or about August 6, 2019, DEBORAH LATALLADI and AMANDA LOVELY-LAMARCHE, acting in concert, sold heroin in Saratoga County to a person known to the

Grand Jury.

5. On or about September 21, 2019, ZOOLEIKA MENDEZ, in a series of coded, guarded and cryptic telephone communications, agreed to sell prescription pills to DEBORAH LATALLADI in Saratoga County.
6. On or about September 21, 2019, in a series of coded, guarded and cryptic telephone communications, LACY ENOUS, A/K/A “RED,” agreed to sell a narcotic drug to JAMES DAGGETT, and in one such conversation ENOUS told DAGGETT “I have empties if you need some” referring to bags with which to package the heroin to sell to his customers, and DAGGETT responded that he did.
7. On or about September 23, 2019, in a series of coded, guarded and cryptic telephone communications, JAMES EGGLESTON ordered both heroin and cocaine, which EGGLESTON referred to as “2 and 2,” from LACY ENOUS, A/K/A “RED,” to sell to others.
8. On or about September 25, 2019, CLARENCE JACKSON, in a series of coded, guarded and cryptic telephone communications, agreed to sell heroin to DEBORAH LATALLADI in Schenectady County.
9. On or about September 25, 2019, PAMELA BACKUS, in a series of coded, guarded and cryptic telephone communications, agreed to sell suboxone to DEBORAH LATALLADI in Saratoga County.
10. On or about September 27, 2019, WILLIAM MAYS, in a series of coded, guarded and cryptic telephone communications, agreed to sell a narcotic drug to DEBORAH LATALLADI in Saratoga County.
11. On or about September 28, 2019, LUIS ROSA, in a series of coded, guarded and cryptic telephone communications, agreed to sell a narcotic drug to LACY ENOUS, A/K/A “RED” in Schenectady County.
12. On or about October 23, 2019, in a series of coded, guarded and cryptic telephone communications, ERIC WILLIAMS agreed to sell a narcotic drug to ADRIAN KELLEY, A/K/A “ACE,” in Schenectady County.
13. On or about October 23, 2019, in a series of coded, guarded and cryptic telephone communications, MATTAHIAS PARSONS and DRANAE WASHINGTON, acting in concert, agreed to sell a narcotic drug to another person in Schenectady County.

14. On or about October 24, 2019, in a coded, guarded and cryptic telephone communication, UNIKIA CROSS told WILLIAM MAYS that she had sold a quantity of prescription pills to JORDON BLOUNT and charged BOUNT “17 a piece,” meaning \$17 per pill.
15. On or about October 26, 2019, DONALD THOMAS, in a series of coded, guarded and cryptic telephone communications, agreed to sell a narcotic drug to FRANKIE MERCADO in Bronx County.
16. On or about October 27, 2019, in a series of coded, guarded and cryptic telephone communications, NOELIA FUENTES ordered “9,” referring to \$900-worth of cocaine, from WILLIAM MAYS, and made arrangements for another female to transport the cocaine from MAYS to FUENTES.
17. On or about October 30, 2019, in a series of coded, guarded and cryptic telephone communications with WILLIAM MAYS, YVONNE SMITH agreed to sell crack cocaine, which MAYS referred to as “hard,” to another person in Saratoga County, and thereafter told MAYS that she had received \$195 from the customer.
18. On or about October 31, 2019, in a series of coded, guarded and cryptic telephone communications, PHILLIP TAYLOR ordered a quantity of cocaine from WILLIAM MAYS to sell to another person.
19. On or about November 1, 2019, in a series of coded, guarded and cryptic telephone communications, MATTAHIAS PARSONS, ERINA LEMPERLE and OMAR CHILDRESS discussed the various customers to whom they were delivering narcotics that day.
20. On or about November 4, 2019, CLARENCE JACKSON drove from Saratoga County to Bronx County to purchase cocaine from DONALD THOMAS.
21. On or about November 5, 2019, ANGEL BRACERO-ORTIZ delivered narcotic pills to DEBORAH LATALLADI at her residence in Saratoga County, which LATALLADI had requested from BRACERO-ORTIZ the previous day in a series of coded, guarded and cryptic telephone communications.
22. On or about November 13, 2019, in a series of coded, guarded and cryptic telephone communications, MATTAHIAS PARSONS agreed to supply DAMIR PARSONS with an ounce of powder cocaine, which DAMIR PARSONS referred to as “a whole one soft,” so DAMIR PARSONS could make a profit selling it to others.
23. On or about November 18, 2019, in a series of coded, guarded and cryptic telephone



communications, ADRIANE PIERCE and FRANK SAWYER, acting in concert, agreed to sell a narcotic drug to another person in Rensselaer County.

24. On or about November 20, 2019, in a series of coded, guarded and cryptic telephone communications, WILLIAM MAYS and SHETWANA VENABLE, acting in concert, agreed to a quantity of powder cocaine, which MAYS referred to as the “soft,” to JORDAN BLOUNT in Saratoga County.
25. On or about November 20, 2019, in a coded, guarded and cryptic telephone communication with WILLIAM MAYS, JORDAN BLOUNT complained that he had put the cocaine he had obtained from MAYS and VENABLE earlier that day “on a scale” and it was “light,” so MAYS owes BLOUNT an additional “seven grams.”
26. On or about November 22, 2019, in a series of coded, guarded and cryptic telephone communications, ERICA DUBRAY ordered “two separate” quantities of a narcotic drug from ADRIANE PIERCE, and PIERCE arranged to meet DUBRAY near a library in Rensselaer County to complete the transaction.
27. On or about November 25, 2019, NICOLE RICH, in a series of coded, guarded and cryptic telephone communications, agreed to sell oxycodone to DEBORAH LATALLADI.
28. On or about December 2, 2019, ADRIANE PIERCE, in a series of coded, guarded and cryptic telephone communications, agreed to sell “two folders” of heroin to NANCY DUKES in Rensselaer County.
29. On or about December 3, 2019, in a series of coded, guarded and cryptic telephone communications, ADRIANE PIERCE, FRANK SAWYER, and NICOLE STRAINER, acting in concert, agreed to sell a narcotic drug to ERICA DUBRAY in Rensselaer County.
30. On or about December 19, 2019, in coded, guarded and cryptic telephone communication, CRYSTAL LEO ordered “half of hard ball and half of soft ice cream,” referring to a quantity of crack cocaine and powder cocaine, respectively, from WILLIAM MAYS in Saratoga County.
31. On or about December 23, 2019, in a series of coded, guarded and cryptic telephone communications, ADRIANE PIERCE directed DEAN HARLAN to sell a narcotic drug to NANCY DUKES in Rensselaer County.
32. On or about January 3, 2020, in a series of coded, guarded and cryptic telephone communications, JANESEA SOTO, acting in concert with ADRIANE PIERCE, agreed to

- sell a narcotic drug to DEAN HARLAN in Rensselaer County.
33. On or about January 3, 2020, ELRAHIM WRIGHT, in a series of coded, guarded and cryptic telephone communications, agreed to sell a narcotic drug to LACY ENOUS, A/K/A “RED” in Albany County.
  34. On or about January 3, 2020, LACY ENOUS, A/K/A, “RED” possessed approximately 70 grams of fentanyl in Albany County.
  35. On or about January 3, 2020, ADRIAN KELLEY, A/K/A “ACE,” possessed approximately 15 grams of cocaine in Albany County.
  36. On or about January 17, 2020, WILLIAM MAYS, in a coded, guarded and cryptic telephone communication, informed PATRICK ROBINSON that he a new supply of high-quality cocaine that he was selling, which MAYS referred to as “new fire,” and suggested ROBINSON apprise his “people,” referring to ROBINSON’s customers, and ROBINSON agreed.
  37. On or about January 24, 2020, in a series of coded, guarded and cryptic telephone communications, CARLOS HERNANDEZ ordered “ten soft,” referring to a quantity of powder cocaine, from SHARROD THORTON in Bronx County.
  38. On or about January 28, 2020, in a coded, guarded and cryptic telephone communication with SHARROD THORTON, LAMONT WILLIAMS complained about a quantity of cocaine, which WILLIAMS referred to as “sneakers,” that he had previously obtained from SHARROD THORTON and DONALD THOMAS and LAMONT WILLIAMS was having difficulty selling to his customers.
  39. On or about January 28, 2020, ELRAHIM WRIGHT possessed approximately 101 grams of fentanyl in Albany County.
  40. On or about February 17, 2020, FRANKIE MERCADO and ALEXANDER RIVERA, in a series of coded, guarded and cryptic telephone communications, agreed to sell a narcotic drug to another person in Bronx County.
  41. On or about February 21, 2020, in a coded, guarded and cryptic telephone communication with WILLIAM MAYS, CRYSTAL LEO ordered a quantity of crack cocaine, which LEO referred to as “a whole of the hard,” to sell to another person.
  42. On or about February 27, 2020, WILLIAM MAYS possessed cocaine and a digital scale in his residence in Saratoga County.

43. On or about March 3, 2020, in a series of coded, guarded and cryptic telephone communications, JOSEPH MEUNIER requested that SHALENA MURRAY, A/K/A “SHAY,” sell him two one-eighth quantity of cocaine, which MEUNIER referred to as “2 8s” and MURRAY agreed to the sale. After the transaction JOSEPH MEUNIER sent a text message to MURRAY to let her know that his customers felt it was “not bad” referring to the quality of the cocaine.
44. On or about March 10, 2020, LACY ENOUS, A/K/A “RED,” and DEBORAH LATALLADI possessed heroin and assorted drug paraphernalia at LATALLADI’s residence in Saratoga County.
45. On or about March 18, 2020, SHALENA MURRAY, A/K/A “SHAY,” possessed approximately 16 grams of cocaine in Saratoga County.
46. On or about March 30, 2020, SHAWN DELMORE purchased approximately three kilograms of cocaine from SHARROD THORTON at 314 East 178<sup>th</sup> Street in Bronx County.
47. On or about April 1, 2020, RICHARD HENDERSON, in a series of coded, guarded and cryptic telephone communications, ordered cocaine from SHARROD THORTON to sell to another person.
48. On or about April 10, 2020, in a coded, guarded and cryptic telephone communication DOROTHY GETHERS, A/K/A “BRENDA,” acting in concert with SHARROD THORTON, agreed to sell cocaine to another person at 314 East 178<sup>th</sup> Street in Bronx County.
49. On or about April 10, 2020, SHARROD THORTON and DONALD THOMAS possessed approximately four kilograms of cocaine in an apartment at 314 East 178<sup>th</sup> Street in Bronx County.
50. On or about April 24, 2020, DAVID GARCIA, in a series of coded, guarded and cryptic telephone communications, agreed to sell a quantity of crack cocaine, which he referred to as “hard,” to another person in Warren County.
51. On or about April 30, 2020, DAVID GARCIA and KIMBERLY GOODSON possessed cocaine, heroin, and assorted drug paraphernalia at their residence in Warren County.

## COUNT 2

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about May 2, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: heroin.

## COUNT 3

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about May 14, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: heroin mixed with fentanyl and acetyl fentanyl.

## COUNT 4

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about June 7, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: fentanyl mixed with acetyl fentanyl.

#### COUNT 5

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DEBORAH LATALLADI and LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DEBORAH LATALLADI and LACY ENOUS, A/K/A “RED,” acting in concert, in the County of Saratoga, State of New York, on or about June 21, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: fentanyl.

#### COUNT 6

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DEBORAH LATALLADI and LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DEBORAH LATALLADI and LACY ENOUS, A/K/A “RED,” acting in concert, in the County of Saratoga, State of New York, on or about July 17, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: fentanyl.

#### COUNT 7

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about July 23, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: heroin mixed with fentanyl.

COUNT 8

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about July 23, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 9

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DEBORAH LATALLADI and AMANDA LOVELY-LAMARCHE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DEBORAH LATALLADI AND AMANDA LOVELY-LAMARCHE, acting in concert, in the County of Saratoga, State of New York, on or about August 6, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: heroin mixed with fentanyl.

COUNT 10

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about August 26, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: fentanyl.

COUNT 11

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A "RED," of the crime of CRIMINAL

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

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Rensselaer, State of New York, on or about September 19, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 12

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Rensselaer, State of New York, on or about September 20, 2019, did knowingly and unlawfully sell a narcotic drug to James Eggleston.

COUNT 13

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Rensselaer, State of New York, on or about September 20, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine, to James Eggleston.

COUNT 14

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES EGGLESTON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in

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

That the said defendant, JAMES EGGLESTON, in the County of Rensselaer, State of New York, on or about September 20, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

#### COUNT 15

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES EGGLESTON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES EGGLESTON, in the County of Rensselaer, State of New York, on or about September 20, 2019, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with the intent to sell it.

#### COUNT 16

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about September 20, 2019, did knowingly and unlawfully sell a narcotic drug to James Daggett.

#### COUNT 17

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES DAGGETT, of the crime of ATTEMPTED



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

That the said defendant, JAMES DAGGETT, in the County of Schenectady, State of New York, on or about September 20, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 18

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, LACY ENOUS, A/K/A “RED,” and JAMES DAGGETT, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, LACY ENOUS, A/K/A “RED,” and JAMES DAGGETT, acting in concert, in the County of Saratoga, State of New York, on or about September 20, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 19

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZOOLEIKA MENDEZ, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZOOLEIKA MENDEZ, in the County of Saratoga, State of New York, on or about September 21, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: oxycodone.

COUNT 20

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZOOLEIKA MENDEZ, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, in violation of Section 220.31 of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZOOLEIKA MENDEZ, in the County of Saratoga, State of New York, on or about September 21, 2019, did knowingly and unlawfully sell a controlled substance, to wit: clonazepam.

COUNT 21

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, NICOLE RICH, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, NICOLE RICH, in the County of Saratoga, State of New York, on or about September 21, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 22

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZOOLEIKA MENDEZ, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZOOLEIKA MENDEZ, in the County of Saratoga, State of New York, on or about September 21, 2019, did knowingly and unlawfully sell the narcotic drug.

COUNT 23

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about September 21, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 24

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, NICOLE RICH, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, NICOLE RICH, in the County of Saratoga, State of New York, on or about September 21, 2019, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 25

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATHIAS PARSONS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATHIAS PARSONS, in the County of Schenectady, State of New York, on or about September 21, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 26

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about September 21, 2019, did knowingly and unlawfully sell a narcotic drug to James Daggett.

COUNT 27

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about September 21, 2019, did knowingly and unlawfully sell a narcotic drug to James Eggleston.

COUNT 28

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about September 21, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine, to James Eggleston.

COUNT 29

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES DAGGETT, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES DAGGETT, in the County of Schenectady, State of New York, on or about September 21, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 30

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES EGGLESTON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES EGGLESTON, in the County of Schenectady, State of New York, on or about September 21, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 31

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES EGGLESTON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES EGGLESTON, in the County of Schenectady, State of New York, on or about September 21, 2019, did knowingly and unlawfully attempt to possess a narcotic

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

COUNT 32

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CLARANCE JACKSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CLARANCE JACKSON, in the County of Schenectady, State of New York, on or about September 22, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 33

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Schenectady, State of New York, on or about September 22, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 34

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about September 23, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 35

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, NICOLE RICH, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, NICOLE RICH, in the County of Saratoga, State of New York, on or about September 23, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 36

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CLARANCE JACKSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CLARANCE JACKSON, in the County of Albany, State of New York, on or about September 23, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 37

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Rensselaer, State of New York, on or about September 23, 2019, did knowingly and unlawfully sell a narcotic drug to Deborah Latalladi.

COUNT 38

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Rensselaer, State of New York, on or about September 23, 2019, did knowingly and unlawfully sell a narcotic drug to James Eggleston.

COUNT 39

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES EGGLESTON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES EGGLESTON, in the County of Rensselaer, State of New York, on or about September 23, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 40

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about September 24, 2019, did knowingly and unlawfully sell a narcotic drug.



COUNT 41

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES DAGGETT, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES DAGGETT, in the County of Schenectady, State of New York, on or about September 24, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 42

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CLARANCE JACKSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CLARANCE JACKSON, in the County of Schenectady, State of New York, on or about September 25, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 43

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Schenectady, State of New York, on or about September 25, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 44

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about September 25, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: heroin.

COUNT 45

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, PAMELA BACKUS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, in violation of Section 220.31 of the Penal Law of the State of New York, committed as follows:

That the said defendant, PAMELA BACKUS, in the County of Saratoga, State of New York, on or about September 25, 2019, did knowingly and unlawfully sell a controlled substance, to wit: buprenorphine.

COUNT 46

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, PAMELA BACKUS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, in violation of Section 220.31 of the Penal Law of the State of New York, committed as follows:

That the said defendant, PAMELA BACKUS, in the County of Saratoga, State of New York, on or about September 25, 2019, did knowingly and unlawfully sell a controlled substance.

COUNT 47

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about September 25, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 48

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about September 25, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 49

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES EGGLESTON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES EGGLESTON, in the County of Schenectady, State of New York, on or about September 25, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 50

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Rensselaer, State of New York, on or about September 25, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 51

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES DAGGETT, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES DAGGETT, in the County of Rensselaer, State of New York, on or about September 25, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 52

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about September 26, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 53

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES DAGGETT, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES DAGGETT, in the County of Schenectady, State of New York, on or about September 26, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 54

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about September 27, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 55

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, NICOLE RICH, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, NICOLE RICH, in the County of Saratoga, State of New York, on or about September 27, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 56

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, PAMELA BACKUS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, in violation of Section 220.31 of the Penal Law of the State of New York, committed as follows:

That the said defendant, PAMELA BACKUS, in the County of Saratoga, State of New York, on or about September 27, 2019, did knowingly and unlawfully sell a controlled substance.

COUNT 57

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CLARENCE JACKSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CLARENCE JACKSON, in the County of Schenectady, State of New York, on or about September 27, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 58

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CLARENCE JACKSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CLARENCE JACKSON, in the County of Schenectady, State of New York, on or about September 27, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 59

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Schenectady, State of New York, on or about September 27, 2019, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 60

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about September 27, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 61

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Schenectady, State of New York, on or about September 27, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 62

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about September 27, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 63

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A "RED," of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A "RED," in the County of Schenectady, State of New York, on or about September 27, 2019, did knowingly and unlawfully sell a narcotic drug to James Eggleston.

COUNT 64

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A "RED," of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A "RED," in the County of Schenectady, State of New York, on or about September 27, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine, to James Eggleston.



COUNT 65

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES EGGLESTON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES EGGLESTON, in the County of Schenectady, State of New York, on or about September 27, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 66

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about September 27, 2019, did knowingly and unlawfully sell a narcotic drug to James Daggett.

COUNT 67

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES DAGGETT, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES DAGGETT, in the County of Schenectady, State of New York, on or about September 27, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 68

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about September 28, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 69

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES DAGGETT, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES DAGGETT, in the County of Schenectady, State of New York, on or about September 28, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 70

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LUIS ROSA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LUIS ROSA, in the County of Schenectady, State of New York, on or about September 28, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 71

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about September 28, 2019, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 72

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about September 29, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 73

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES DAGGETT, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES DAGGETT, in the County of Schenectady, State of New York, on or about September 29, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 74

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about September 30, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 75

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about September 30, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 76

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES EGGLESTON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES EGGLESTON, in the County of Schenectady, State of New York, on or about September 30, 2019, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 77

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JAMES EGGLESTON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JAMES EGGLESTON, in the County of Schenectady, State of New York, on or about September 30, 2019, did knowingly and unlawfully attempt to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug and the preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

COUNT 78

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CLARENCE JACKSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CLARENCE JACKSON, in the County of Saratoga, State of New York, on or about October 2, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 79

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CLARENCE JACKSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CLARENCE JACKSON, in the County of Saratoga, State of New York, on or about October 2, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 80

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about October 2, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 81

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about October 2, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 82

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about October 2, 2019, did knowingly and unlawfully sell the narcotic drug, to wit: cocaine.

COUNT 83

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZOOLEIKA MENDEZ, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, in violation of Section c of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZOOLEIKA MENDEZ, in the County of Saratoga, State of New York, on or about October 13, 2019, did knowingly and unlawfully sell a controlled substance.

COUNT 84

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, in violation of Section 220.31 of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about October 13, 2019, did knowingly and unlawfully sell a controlled substance.

COUNT 85

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, NICOLE RICH, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, in violation of Section 220.31 of the Penal Law of the State of New York, committed as follows:

That the said defendant, NICOLE RICH, in the County of Saratoga, State of New York, on or about October 16, 2019, did knowingly and unlawfully sell a controlled substance.

COUNT 86

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of CRIMINAL SALE

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

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about October 18, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 87

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DAMIR PARSONS, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DAMIR PARSONS, in the County of Schenectady, State of New York, on or about October 18, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 88

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about October 20, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 89

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in



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

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about October 20, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

#### COUNT 90

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about October 20, 2019, did knowingly and unlawfully sell a narcotic drug.

#### COUNT 91

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DAMIR PARSONS, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DAMIR PARSONS, in the County of Schenectady, State of New York, on or about October 20, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

#### COUNT 92

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, MATTAHIAS PARSONS and ERIC WILLIAMS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in

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

That the said defendants, MATTAHIAS PARSONS and ERIC WILLIAMS, acting in concert, in the County of Schenectady, State of New York, on or about October 20, 2019, did knowingly and unlawfully sell a narcotic drug.

#### COUNT 93

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about October 21, 2019, did knowingly and unlawfully sell a narcotic drug.

#### COUNT 94

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIAN KELLEY, A/K/A “ACE,” of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIAN KELLEY, A/K/A “ACE,” in the County of Schenectady, State of New York, on or about October 21, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

#### COUNT 95

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ERIC WILLIAMS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41

(Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ERIC WILLIAMS, in the County of Schenectady, State of New York, on or about October 23, 2019, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 96

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ERIC WILLIAMS, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ERIC WILLIAMS, in the County of Schenectady, State of New York, on or about October 23, 2019, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 97

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ERIC WILLIAMS, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ERIC WILLIAMS, in the County of Schenectady, State of New York, on or about October 23, 2019, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 98

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of ATTEMPTED

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

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about October 23, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 99

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about October 23, 2019, did knowingly and unlawfully attempt to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 100

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, MATTAHIAS PARSONS and DRANAE WASHINGTON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, MATTAHIAS PARSONS and DRANAE WASHINGTON, acting in concert, in the County of Schenectady, State of New York, on or about October 23, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 101

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about October 23, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 102

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about October 23, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 103

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about October 23, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 104

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about October 23, 2019, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 105

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, WILLIAM MAYS and UNIKIA CROSS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, in violation of Section 220.31 of the Penal Law of the State of New York, committed as follows:

That the said defendants, WILLIAM MAYS and UNIKIA CROSS, acting in concert, in the County of Saratoga, State of New York, on or about October 24, 2019, did knowingly and unlawfully sell a controlled substance.

COUNT 106

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JORDAN BLOUNT, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, in violation of Sections 110.00 and 220.06 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JORDAN BLOUNT, in the County of Saratoga, State of New York, on or about October 24, 2019, did knowingly and unlawfully attempt to possess a controlled substance with the intent to sell it.

COUNT 107

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHALENA MURRAY, A/K/A “SHAY,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHALENA MURRAY, A/K/A “SHAY,” in the County of Saratoga, State of New York, on or about October 25, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 108

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about October 25, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 109

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, PAMELA BACKUS, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, PAMELA BACKUS, in the County of Saratoga, State of New York, on or about October 25, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 110

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DONALD THOMAS and SHARROD THORTON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DONALD THOMAS and SHARRON THORTON, acting in concert, in the County of Bronx, State of New York, on or about October 26, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 111

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CLARENCE JACKSON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CLARENCE JACKSON, in the County of Bronx, State of New York, on or about October 26, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 112

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DONALD THOMAS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DONALD THOMAS, in the County of Bronx, State of New York, on or about October 26, 2019, did knowingly and unlawfully sell a narcotic drug.



COUNT 113

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, FRANKIE MERCADO, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, FRANKIE MERCADO, in the County of Bronx, State of New York, on or about October 26, 2019, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 114

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about October 27, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 115

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, NOELIA FUENTES, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, NOELIA FUENTES, in the County of Saratoga, State of New York, on or about October 27, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 116

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, NOELIA FUENTES, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, NOELIA FUENTES, in the County of Saratoga, State of New York, on or about October 27, 2019, did knowingly and unlawfully attempt to possess 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-eighth ounce or more.

COUNT 117

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, CLARENCE JACKSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, CLARENCE JACKSON, in the County of Saratoga, State of New York, on or about October 28, 2019, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 118

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, CLARENCE JACKSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, CLARENCE JACKSON, in the County of Saratoga, State of New York, on or about October 29, 2019, did knowingly and unlawfully sell a narcotic drug, to wit:

cocaine.

COUNT 119

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, WILLIAM MAYS and YVONNE SMITH, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, WILLIAM MAYS and YVONNE SMITH, acting in concert, in the County of Saratoga, State of New York, on or about October 30, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 120

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, WILLIAM MAYS and YVONNE SMITH, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, WILLIAM MAYS and YVONNE SMITH, acting in concert, in the County of Saratoga, State of New York, on or about October 31, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 121

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, PHILIP TAYLOR, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, PHILIP TAYLOR, in the County of Saratoga, State of New York, on or about October 31, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with

the intent to sell it.

COUNT 122

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about October 26, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 123

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, WILLIAM MAYS and YVONNE SMITH, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, WILLIAM MAYS and YVONNE SMITH, acting in concert, in the County of Saratoga, State of New York, on or about October 31, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 124

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, YVONNE SMITH, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, YVONNE SMITH, in the County of Saratoga, State of New York, on or about October 31, 2019, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 125

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, MATTAHIAS PARSONS, OMAR CHILDRESS and ERINA LEMPERLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, MATTAHIAS PARSONS, OMAR CHILDRESS and ERINA LEMPERLE, acting in concert, in the County of Schenectady, State of New York, on or about November 1, 2019, did knowingly and unlawfully sell a narcotic drug to a male.

COUNT 126

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, MATTAHIAS PARSONS, ERIC WILLIAMS, OMAR CHILDRESS and ERINA LEMPERLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, MATTAHIAS PARSONS, ERIC WILLIAMS, OMAR CHILDRESS, DRANAE WASHINGTON and ERINA LEMPERLE, acting in concert, in the County of Schenectady, State of New York, on or about November 1, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 127

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, MATTAHIAS PARSONS, ERIC WILLIAMS, OMAR CHILDRESS and ERINA LEMPERLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, MATTAHIAS PARSONS, ERIC WILLIAMS, OMAR

CHILDRRESS and ERINA LEMPERLE, acting in concert, in the County of Schenectady, State of New York, on or about November 2, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 128

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about November 2, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 129

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DONALD THOMAS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DONALD THOMAS, in the County of Bronx, State of New York, on or about November 4, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 130

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CLARENCE JACKSON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CLARENCE JACKSON, in the County of Bronx, State of New York, on or about November 4, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 131

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ANGEL BRACERO-ORTIZ, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ANGEL BRACERO-ORTIZ, in the County of Saratoga, State of New York, on or about November 5, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 132

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about November 5, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 133

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, MATTAHIAS PARSONS and OMAR CHILDRESS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, MATTAHIAS PARSONS and OMAR CHILDRESS, acting in concert, in the County of Schenectady, State of New York, on or about November 8, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 134

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZOOLEIKA MENDEZ, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZOOLEIKA MENDEZ, in the County of Saratoga, State of New York, on or about November 13, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 135

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZOOLEIKA MENDEZ, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, in violation of Section 220.31 of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZOOLEIKA MENDEZ, in the County of Saratoga, State of New York, on or about November 13, 2019, did knowingly and unlawfully sell a controlled substance.

COUNT 136

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, in violation of Section 220.31 of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about November 13, 2019, did knowingly and unlawfully sell a controlled substance.

COUNT 137

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of CRIMINAL SALE



OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about November 13, 2019, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 138

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DAMIR PARSONS, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DAMIR PARSONS, in the County of Schenectady, State of New York, on or about November 13, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 139

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DAMIR PARSONS, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DAMIR PARSONS, in the County of Schenectady, State of New York, on or about November 13, 2019, did knowingly and unlawfully attempt to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 140

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LOUIS ROSA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LOUIS ROSA, in the County of Schenectady, State of New York, on or about November 18, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 141

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about November 18, 2019, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 142

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about November 18, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 143

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIAN KELLEY, A/K/A “ACE,” of the crime of

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

That the said defendant, ADRIAN KELLEY, A/K/A “ACE,” in the County of Schenectady, State of New York, on or about November 18, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 144

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, ADRIANE PIERCE and FRANK SAWYER, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, ADRIANE PIERCE and FRANK SAWYER, acting in concert, in the County of Rensselaer, State of New York, on or about November 18, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 145

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIANE PIERCE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIANE PIERCE, in the County of Rensselaer, State of New York, on or about November 18, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 146

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, FRANK SAWYER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of

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

That the said defendant, FRANK SAWYER, in the County of Rensselaer, State of New York, on or about November 18, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 147

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, WILLIAM MAYS and SHETWANA VENABLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, WILLIAM MAYS and SHETWANA VENABLE, acting in concert, in the County of Saratoga, State of New York, on or about November 18, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 148

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, WILLIAM MAYS and SHETWANA VENABLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, WILLIAM MAYS and SHETWANA VENABLE, acting in concert, in the County of Saratoga, State of New York, on or about November 20, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 149

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JORDAN BLOUNT, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JORDAN BLOUNT, in the County of Saratoga, State of New York, on or about November 20, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 150

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LOUIS ROSA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LOUIS ROSA, in the County of Schenectady, State of New York, on or about November 20, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 151

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A "RED," of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A "RED," in the County of Schenectady, State of New York, on or about November 20, 2019, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 152

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about November 20, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 153

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIAN KELLEY, A/K/A “ACE,” of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIAN KELLEY, A/K/A “ACE,” in the County of Schenectady, State of New York, on or about November 20, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 154

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, WILLIAM MAYS and SHETWANA VENABLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, WILLIAM MAYS and SHETWANA VENABLE, acting in concert, in the County of Saratoga, State of New York, on or about November 21, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 155

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIANE PIERCE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIANE PIERCE, in the County of Rensselaer, State of New York, on or about November 22, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 156

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ERICA DUBRAY, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ERICA DUBRAY, in the County of Rensselaer, State of New York, on or about November 22, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 157

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, WILLIAM MAYS and UNIKIA CROSS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, WILLIAM MAYS and UNIKIA CROSS, acting in concert, in the County of Saratoga, State of New York, on or about November 25, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 158

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JORDAN BLOUNT, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JORDAN BLOUNT, in the County of Saratoga, State of New York, on or about November 25, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 159

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIANE PIERCE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIANE PIERCE, in the County of Rensselaer, State of New York, on or about November 26, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 160

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, MATTAHIAS PARSONS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about November 26, 2019, did knowingly and unlawfully sell a narcotic drug.



COUNT 161

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, NICOLE RICH, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, NICOLE RICH, in the County of Saratoga, State of New York, on or about November 25, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 162

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIANE PIERCE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIANE PIERCE, in the County of Rensselaer, State of New York, on or about November 29, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 163

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, FRANK SAWYER, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, FRANK SAWYER, in the County of Rensselaer, State of New York, on or about November 29, 2019, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 164

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about December 2, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 165

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIAN KELLEY, A/K/A “ACE,” of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIAN KELLEY, A/K/A “ACE,” in the County of Schenectady, State of New York, on or about December 2, 2019, did knowingly and unlawfully attempt to possess the narcotic drug heroin with the intent to sell it.

COUNT 166

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIANE PIERCE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIANE PIERCE, in the County of Rensselaer, State of New York, on or about December 2, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 167

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ERICA DUBRAY, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ERICA DUBRAY, in the County of Rensselaer, State of New York, on or about December 2, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 168

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIANE PIERCE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIANE PIERCE, in the County of Rensselaer, State of New York, on or about December 2, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 169

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, NANCY DUKES, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, NANCY DUKES, in the County of Rensselaer, State of New York, on or about December 2, 2019, did knowingly and unlawfully attempt to possess the narcotic drug heroin with the intent to sell it.

COUNT 170

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DONALD THOMAS and SHARROD THORTON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DONALD THOMAS and SHARROD THORTON, acting in concert, in the County of Bronx, State of New York, on or about December 2, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 171

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, ADRIANE PIERCE, FRANK SAWYER and NICOLE STRAINER, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, ADRIANE PIERCE, FRANK SAWYER and NICOLE STRAINER, acting in concert, in the County of Rensselaer, State of New York, on or about December 3, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 172

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of ATTEMPTED CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Rensselaer, State of New York, on or about December 5, 2019, did knowingly and unlawfully attempt to sell a

narcotic drug.

COUNT 173

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of ATTEMPTED CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about December 6, 2019, did knowingly and unlawfully attempt to sell a narcotic drug.

COUNT 174

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Schenectady, State of New York, on or about December 7, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 175

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIAN KELLEY, A/K/A “ACE,” of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIAN KELLEY, A/K/A “ACE,” in the County of Schenectady, State of New York, on or about December 7, 2019, did knowingly and unlawfully attempt to possess

a narcotic drug with the intent to sell it.

COUNT 176

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CLARENCE JACKSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CLARENCE JACKSON, in the County of Albany, State of New York, on or about December 7, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 177

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CLARENCE JACKSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CLARENCE JACKSON, in the County of Albany, State of New York, on or about December 7, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 178

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of ATTEMPTED CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Rensselaer, State of New York, on or about December 9, 2019, did knowingly and unlawfully attempt to sell a narcotic drug.

COUNT 179

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DONALD THOMAS and SHARROD THORTON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DONALD THOMAS and SHARROD THORTON, acting in concert, in the County of Bronx, State of New York, on or about December 12, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 180

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHAWN DELMORE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHAWN DELMORE, in the County of Bronx, State of New York, on or about December 12, 2019, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 181

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about December 19, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 182

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CRYSTAL LEO, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CRYSTAL LEO, in the County of Saratoga, State of New York, on or about December 19, 2019, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 183

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about December 20, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 184

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DAMIR PARSONS, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DAMIR PARSONS, in the County of Schenectady, State of New York, on or about December 20, 2019, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.



COUNT 185

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, ADRIAN PIERCE and DEAN HARLAN, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, ADRIAN PIERCE and DEAN HARLAN, acting in concert, in the County of Rensselaer, State of New York, on or about December 23, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 186

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, NANCY DUKES, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, NANCY DUKES, in the County of Rensselaer, State of New York, on or about December 23, 2019, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 187

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHARROD THORTON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHARROD THORTON, in the County of Bronx, State of New York, on or about December 28, 2019, did knowingly and unlawfully sell a narcotic drug.

COUNT 188

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEAN HARLAN, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEAN HARLAN, in the County of Albany, State of New York, on or about January 1, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 189

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, ADRIANE PIERCE, JANESEA SOTO and DEAN HARLAN, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, ADRIANE PIERCE, JANESEA SOTO and DEAN HARLAN, acting in concert, in the County of Rensselaer, State of New York, on or about January 3, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 190

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ELRAHIM WRIGHT, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, in violation of Section 220.43 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ELRAHIM WRIGHT, in the County of Albany, State of New York, on or about January 3, 2020, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and the preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 191

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ELRAHIM WRIGHT, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ELRAHIM WRIGHT, in the County of Albany, State of New York, on or about January 3, 2020, did knowingly and unlawfully possess a narcotic drug, to wit: fentanyl, with the intent to sell it.

COUNT 192

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ELRAHIM WRIGHT, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ELRAHIM WRIGHT, in the County of Albany, State of New York, on or about January 3, 2020, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 193

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A "RED," of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A "RED," in the County of Albany, State of New York, on or about January 3, 2020, did knowingly and unlawfully possess a narcotic drug, to wit: fentanyl, with the intent to sell it.

COUNT 194

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Albany, State of New York, on or about January 3, 2020, did knowingly and unlawfully 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 one-half ounce or more.

COUNT 195

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LACY ENOUS, A/K/A “RED,” in the County of Albany, State of New York, on or about January 3, 2020, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 196

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIAN KELLEY, A/K/A “ACE,” of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIAN KELLEY, A/K/A “ACE,” in the County of Albany, State of New York, on or about January 3, 2020, did knowingly and unlawfully possess a narcotic drug, to wit: fentanyl, with the intent to sell it.

COUNT 197

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIAN KELLEY, A/K/A “ACE,” of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIAN KELLEY, A/K/A “ACE,” in the County of Albany, State of New York, on or about January 3, 2020, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 198

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIAN KELLEY, A/K/A “ACE,” of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIAN KELLEY, A/K/A “ACE,” in the County of Albany, State of New York, on or about January 3, 2020, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with the intent to sell it.

COUNT 199

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIAN KELLEY, A/K/A “ACE,” of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIAN KELLEY, A/K/A “ACE,” in the County of Albany, State of New York, on or about January 3, 2020, did knowingly and unlawfully possess 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 200

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of ATTEMPTED CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about January 3, 2020, did knowingly and unlawfully attempt to sell a narcotic drug, to wit: cocaine.

COUNT 201

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, MATTAHIAS PARSONS, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, MATTAHIAS PARSONS, in the County of Schenectady, State of

New York, on or about January 3, 2020, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with the intent to sell it.

COUNT 202

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about January 3, 2020, did knowingly and unlawfully possess 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 203

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE, in violation of Section 220.50 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about January 3, 2020, did knowingly possess 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 the purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

COUNT 204

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE, in violation of Section 220.50 (Subdivision 2) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about January 3, 2020, did knowingly possess 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 intends to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

COUNT 205

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MATTAHIAS PARSONS, of the crime of CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE, in violation of Section 220.50 (Subdivision 3) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MATTAHIAS PARSONS, in the County of Schenectady, State of New York, on or about January 3, 2020, did knowingly possess a digital scale 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 206

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, ADRIANE PEIRCE, JANESEA SOTO and DEAN HARLAN, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD



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

That the said defendants, ADRIANE PEIRCE, JANESEA SOTO and DEAN HARLAN, acting in concert, in the County of Rensselaer, State of New York, on or about January 4, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 207

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, JANESEA SOTO and ADRIANE PIERCE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, JANESEA SOTO and ADRIANE PIERCE, acting in concert, in the County of Rensselaer, State of New York, on or about January 4, 2020, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 208

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about January 17, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 209

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, PATRICK ROBINSON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in

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

That the said defendant, PATRICK ROBINSON, in the County of Saratoga, State of New York, on or about January 17, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

#### COUNT 210

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHARROD THORTON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHARROD THORTON, in the County of Bronx, State of New York, on or about January 24, 2020, did knowingly and unlawfully sell a narcotic drug.

#### COUNT 211

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CARLOS HERNANDEZ, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CARLOS HERNANDEZ, in the County of Bronx, State of New York, on or about January 24, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

#### COUNT 212

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, SHARROD THORTON and DONALD THOMAS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in

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

That the said defendants, SHARROD THORTON and DONALD THOMAS, acting in concert, in the County of Bronx, State of New York, on or about January 28, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 213

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LAMONT WILLIAMS, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LAMONT WILLIAMS, in the County of Bronx, State of New York, on or about January 28, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 214

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ELRAHIM WRIGHT, of the crime of ATTEMPTED CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, in violation of Sections 110.00 and 220.43 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ELRAHIM WRIGHT, in the County of Albany, State of New York, on or about January 28, 2020, did knowingly and unlawfully attempt to sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and the preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

COUNT 215

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ELRAHIM WRIGHT, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ELRAHIM WRIGHT, in the County of Albany, State of New York, on or about January 28, 2020, did knowingly and unlawfully possess a narcotic drug, to wit: fentanyl, with the intent to sell it.

COUNT 216

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ELRAHIM WRIGHT, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ELRAHIM WRIGHT, in the County of Albany, State of New York, on or about January 28, 2020, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 217

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIANE PIERCE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIANE PIERCE, in the County of Albany, State of New York, on or about January 28, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 218

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ADRIANE PIERCE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ADRIANE PIERCE, in the County of Albany, State of New York, on or about January 28, 2020, did knowingly and unlawfully attempt to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 219

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHARROD THORTON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHARROD THORTON, in the County of Bronx, State of New York, on or about January 30, 2020, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 220

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHARROD THORTON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHARROD THORTON, in the County of Bronx, State of New

York, on or about January 30, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 221

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RICHARD HENDERSON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RICHARD HENDERSON, in the County of Bronx, State of New York, on or about January 30, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 222

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RICHARD HENDERSON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RICHARD HENDERSON, in the County of Bronx, State of New York, on or about January 30, 2020, did knowingly and unlawfully attempt to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 223

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, SHARROD THORTON and DONALD THOMAS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in

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

That the said defendants, SHARROD THORTON and DONALD THOMAS, acting in concert, in the County of Bronx, State of New York, on or about February 5, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 224

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LAMONT WILLIAMS, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LAMONT WILLIAMS, in the County of Bronx, State of New York, on or about February 5, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 225

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DONALD THOMAS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DONALD THOMAS, in the County of Bronx, State of New York, on or about February 5, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 226

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHAWN DELMORE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in

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

That the said defendant, SHAWN DELMORE, in the County of Bronx, State of New York, on or about February 5, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 227

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Albany, State of New York, on or about or between February 2, 2020 through February 6, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 228

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, NOELIA FUENTES, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, NOELIA FUENTES, in the County of Saratoga, State of New York, on or about or between February 2, 2020 through February 6, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 229

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, FRANKIE MERCADO, of the crime of CRIMINAL SALE OF



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

That the said defendant, FRANKIE MERCADO, in the County of Bronx, State of New York, on or about February 8, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 230

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHARROD THORTON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHARROD THORTON, in the County of Bronx, State of New York, on or about February 10, 2020, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 231

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHARROD THORTON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHARROD THORTON, in the County of Bronx, State of New York, on or about February 10, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 232

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CARLOS HERNANDEZ, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in

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

That the said defendant, CARLOS HERNANDEZ, in the County of Bronx, State of New York, on or about February 10, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 233

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Nassau, State of New York, on or about February 13, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 234

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, FRANKIE MERCADO and ALEXANDER RIVERA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, FRANKIE MERCADO and ALEXANDER RIVERA, acting in concert, in the County of Bronx, State of New York, on or about February 17, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 235

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL SALE OF A

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

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about February 18, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 236

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, PATRICK ROBINSON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, PATRICK ROBINSON, in the County of Saratoga, State of New York, on or about February 18, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 237

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about February 19, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 238

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, PHILIP TAYLOR, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of

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

That the said defendant, PHILIP TAYLOR, in the County of Saratoga, State of New York, on or about February 19, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 239

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, FRANKIE MERCADO, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, FRANKIE MERCADO, in the County of Bronx, State of New York, on or about February 21, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 240

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about February 21, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 241

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CRYSTAL LEO, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CRYSTAL LEO, in the County of Saratoga, State of New York, on

or about February 21, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 242

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, FRANKIE MERCADO, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, FRANKIE MERCADO, in the County of Bronx, State of New York, on or about February 22, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with intent to sell it.

COUNT 243

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, FRANKIE MERCADO, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, FRANKIE MERCADO, in the County of Bronx, State of New York, on or about February 22, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 244

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about February 26, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 245

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about February 27, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 246

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about February 27, 2020, did knowingly and unlawfully possess the narcotic drug, to wit: cocaine, with the intent to sell it.

COUNT 247

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WILLIAM MAYS, of the crime of CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE, in violation of Section 220.50 (Subdivision 3) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WILLIAM MAYS, in the County of Saratoga, State of New York, on or about February 27, 2020, did knowingly possess a digital scale 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 248

THE GRAND JURY OF THE COUNTY OF BRONX, by this Indictment, further accuses the above-named defendants, FRANKIE MERCADO and ALEXANDER RIVERA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, FRANKIE MERCADO and ALEXANDER RIVERA, acting in concert, in the County of Bronx, State of New York, on or about February 29, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 249

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHALENA MURRAY, A/K/A “SHAY,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHALENA MURRAY, A/K/A “SHAY, in the County of Saratoga, State of New York, on or about March 3, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 250

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JOSEPH MEUNIER, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JOSEPH MEUNIER, in the County of Saratoga, State of New York, on or about March 3, 2020, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 251

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JOSEPH MEUNIER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JOSEPH MEUNIER, in the County of Saratoga, State of New York, on or about March 3, 2020, did knowingly and unlawfully attempt to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug and the preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

COUNT 252

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHALENA MURRAY, A/K/A “SHAY,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHALENA MURRAY, A/K/A “SHAY,” in the County of Saratoga, State of New York, on or about March 5, 2020, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing the narcotic drug cocaine and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 253

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JOSEPH MEUNIER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:



That the said defendant, JOSEPH MEUNIER, in the County of Saratoga, State of New York, on or about March 5, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 254

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JOSEPH MEUNIER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JOSEPH MEUNIER, in the County of Saratoga, State of New York, on or about March 5, 2020, did knowingly and unlawfully attempt to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 255

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, FRANKIE MERCADO and ALEXANDER RIVERA, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, FRANKIE MERCADO and ALEXANDER RIVERA, acting in concert, in the County of Bronx, State of New York, on or about March 7, 2020, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 256

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, FRANKIE MERCADO, of the crime of CRIMINAL SALE OF

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

That the said defendant, FRANKIE MERCADO, in the County of Bronx, State of New York, on or about March 7, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 257

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, FRANKIE MERCADO and ALEXANDER RIVERA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, FRANKIE MERCADO and ALEXANDER RIVERA, acting in concert, in County of Bronx, State of New York, on or about March 8, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 258

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DEBORAH LATALLADI and LACY ENOUS, A/K/A “RED,” of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DEBORAH LATALLADI and LACY ENOUS, A/K/A “RED,” acting in concert, in the County of Saratoga, State of New York, on or about March 10, 2020, did knowingly and unlawfully possess a narcotic drug, to wit: heroin, with the intent to sell it.

COUNT 259

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DEBORAH LATALLADI and LACY ENOUS, A/K/A

“RED,” of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DEBORAH LATALLADI and LACY ENOUS, A/K/A “RED,” acting in concert, in the County of Saratoga, State of New York, on or about March 10, 2020, did knowingly and unlawfully possess 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-eighth ounce or more.

#### COUNT 260

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DEBORAH LATALLADI and LACY ENOUS, A/K/A “RED,” of the crime of CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE, in violation of Section 220.50 (Subdivision 2) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DEBORAH LATALLADI and LACY ENOUS, A/K/A “RED,” acting in concert, in the County of Saratoga, State of New York, on or about March 10, 2020, did knowingly possess gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities or 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 the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

#### COUNT 261

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DEBORAH LATALLADI and LACY ENOUS, A/K/A “RED,” of the crime of CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE, in violation of Section 220.50 (Subdivision 3) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DEBORAH LATALLADI and LACY ENOUS, A/K/A “RED,” acting in concert, in the County of Saratoga, State of New York, on or about March 10, 2020, did knowingly possess a digital scale 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 262

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, ANGEL BRACERO-ORTIZ and ZOOLEIKA MENDEZ, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, ANGEL BRACERO-ORTIZ and ZOOLEIKA MENDEZ, acting in concert, in the County of Saratoga, State of New York, on or about March 11, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 263

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about March 11, 2020, did knowingly and unlawfully possess a narcotic drug with the intent to sell it.

COUNT 264

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DEBORAH LATALLADI, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DEBORAH LATALLADI, in the County of Saratoga, State of New York, on or about March 11, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 265

THE GRAND JURY OF THE COUNTY OF BRONX, by this Indictment, further accuses the above-named defendant, SHARROD THORTON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHARROD THORTON, in the County of Bronx, State of New York, on or about March 11, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 266

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DOROTHY GETHERS, A/K/A “BRENDA,” of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DOROTHY GETHERS, A/K/A “BRENDA,” in the County of Bronx, State of New York, on or about March 11, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 267

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHALENA MURRAY, A/K/A “SHAY,” of the crime of ATTEMPTED CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Sections 110.00 and 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHALENA MURRAY, A/K/A “SHAY,” County of Saratoga, State of New York, on or about March 19, 2020, did knowingly and unlawfully attempt to sell one or more preparations, compounds, mixtures or substances containing a narcotic drug and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 268

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHALENA MURRAY, A/K/A “SHAY,” of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.18 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHALENA MURRAY, A/K/A “SHAY,” in the County of Saratoga, State of New York, on or about March 19, 2020, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

COUNT 269

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHALENA MURRAY, A/K/A “SHAY,” of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed

as follows:

That the said defendant, SHALENA MURRAY, A/K/A “SHAY,” in the County of Saratoga, State of New York, on or about March 19, 2020, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with the intent to sell it.

COUNT 270

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RICHARD HENDERSON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RICHARD HENDERSON, in the County of Bronx, State of New York, on or about March 25, 2020, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with the intent to sell it.

COUNT 271

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DONALD THOMAS and SHARROD THORTON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, in violation of Section 220.43 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DONALD THOMAS and SHARROD THORTON, acting in concert, in the County of Bronx, State of New York, on or about March 30, 2020, did knowingly and unlawfully sell 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 two ounces or more.

COUNT 272

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHAWN DELMORE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, in violation of Section 220.21 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHAWN DELMORE, in the County of Bronx, State of New York, on or about March 30, 2020, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

COUNT 273

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHAWN DELMORE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHAWN DELMORE, in the County of Bronx, State of New York, on or about March 30, 2020, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with the intent to sell it.

COUNT 274

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHARROD THORTON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHARROD THORTON, in the County of Bronx, State of New York, on or about April 1, 2020, did knowingly and unlawfully sell a narcotic drug.



COUNT 275

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RICHARD HENDERSON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RICHARD HENDERSON, in the County of Bronx, State of New York, on or about April 1, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 276

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DAVID GARCIA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DAVID GARCIA, in the County of Saratoga, State of New York, on or about April 3, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 277

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DAVID GARCIA and KIMBERLY GOODSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DAVID GARCIA and KIMBERLY GOODSON, acting in concert, in the County of Warren, State of New York, on or about April 6, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 278

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DAVID GARCIA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DAVID GARCIA, in the County of Warren, State of New York, on or about April 4, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 279

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DAVID GARCIA and KIMBERLY GOODSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DAVID GARCIA and KIMBERLY GOODSON, acting in concert, in the County of Saratoga, State of New York, on or about April 5, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 280

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DAVID GARCIA and KIMBERLY GOODSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DAVID GARCIA and KIMBERLY GOODSON, acting in concert, in the County of Warren, State of New York, on or about April 8, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 281

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DAVID GARCIA and KIMBERLY GOODSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DAVID GARCIA and KIMBERLY GOODSON, acting in concert, in the County of Saratoga, State of New York, on or about April 9, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 282

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, SHARROD THORTON and DOROTHY GETHERS, A/K/A “BRENDA,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, SHARROD THORTON and DOROTHY GETHERS, A/K/A “BRENDA,” acting in concert, in the County of Bronx, State of New York, on or about April 10, 2020, did knowingly and sell a narcotic drug.

COUNT 283

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, SHARROD THORTON and DOROTHY GETHERS, A/K/A “BRENDA,” of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, SHARROD THORTON and DOROTHY GETHERS, A/K/A “BRENDA,” acting in concert, in the County of Bronx, State of New York, on or about April 10, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 284

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RICHARD HENDERSON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RICHARD HENDERSON, in the County of Bronx, State of New York, on or about April 10, 2020, did knowingly and unlawfully attempt to possess a narcotic drug with the intent to sell it.

COUNT 285

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DONALD THOMAS and SHARROD THORTON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, in violation of Section 220.21 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DONALD THOMAS AND SHARROD THORTON, acting in concert, in the County of Bronx, State of New York, on or about April 10, 2020, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

COUNT 286

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DONALD THOMAS and SHARROD THORTON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DONALD THOMAS and SHARROD THORTON, acting in concert, in the County of Bronx, State of New York, on or about April 10, 2020, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with the intent to sell it.

COUNT 287

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DONALD THOMAS and SHARROD THORTON, of the crime of CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE, in violation of Section 220.50 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DONALD THOMAS and SHARROD THORTON, acting in concert, in the County of Bronx, State of New York, on or about April 10, 2020, did knowingly possess 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 the purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

COUNT 288

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DONALD THOMAS and SHARROD THORTON, of the crime of CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE, in violation of Section 220.50 (Subdivision 2) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DONALD THOMAS and SHARROD THORTON, acting in concert, in the County of Bronx, State of New York, on or about April 10, 2020, did knowingly possess 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 intends to use, the same

for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

COUNT 289

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DONALD THOMAS and SHARROD THORTON, of the crime of CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE, in violation of Section 220.50 (Subdivision 3) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DONALD THOMAS and SHARROD THORTON, acting in concert,, in the County of Bronx, State of New York, on or about April 10, 2020, did knowingly possess a digital scale 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 290

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DAVID GARCIA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DAVID GARCIA, in the County of Saratoga, State of New York, on or about April 21, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 291

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DAVID GARCIA, of the crime of CRIMINAL SALE OF A

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

That the said defendant, DAVID GARCIA, in the County of Schenectady, State of New York, on or about April 24, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 292

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DAVID GARCIA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DAVID GARCIA, in the County of Warren, State of New York, on or about April 26, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 293

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DAVID GARCIA and KIMBERLY GOODSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DAVID GARCIA and KIMBERLY GOODSON, acting in concert, in the County of Warren, State of New York, on or about April 27, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 294

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DAVID GARCIA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DAVID GARCIA, in the County of Warren, State of New York, on

or about April 27, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 295

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DAVID GARCIA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DAVID GARCIA, in the County of Saratoga, State of New York, on or about April 29, 2020, did knowingly and unlawfully sell a narcotic drug.

COUNT 296

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DAVID GARCIA and KIMBERLY GOODSON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DAVID GARCIA and KIMBERLY GOODSON, acting in concert, in the County of Warren, State of New York, on or about April 30, 2020, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine and heroin, with the intent to sell it.

COUNT 297

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DAVID GARCIA and KIMBERLY GOODSON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Section 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DAVID GARCIA and KIMBERLY GOODSON, acting in concert, in the County of Warren, State of New York, on or about April 30, 2020, did knowingly and



unlawfully possess 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-eighth of an ounce or more.

COUNT 298

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DAVID GARCIA and KIMBERLY GOODSON, of the crime of CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE, in violation of Section 220.50 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DAVID GARCIA and KIMBERLY GOODSON, acting in concert, in the County of Warren, State of New York, on or about April 30, 2020, did knowingly possess 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 the purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

COUNT 299

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DAVID GARCIA and KIMBERLY GOODSON, of the crime of CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE, in violation of Section 220.50 (Subdivision 2) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DAVID GARCIA and KIMBERLY GOODSON, acting in concert, in the County of Warren, State of New York, on or about April 30, 2020, did knowingly possess 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 intends to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

### COUNT 300

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, DAVID GARCIA and KIMBERLY GOODSON, of the crime of CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE, in violation of Section 220.50 (Subdivision 3) of the Penal Law of the State of New York, committed as follows:

That the said defendants, DAVID GARCIA and KIMBERLY GOODSON, acting in concert,, in the County of Warren, State of New York, on or about April 30, 2020, did knowingly possess a digital scale 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 301

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, DONALD THOMAS, of the crime of OPERATING AS A MAJOR TRAFFICKER, in violation of Section 220.77(3) of the Penal Law of the State of New York, committed as follows:

That the said defendant, DONALD THOMAS, acting in concert with others, in Bronx County, and elsewhere in and outside of the State of New York, on or about October 25, 2019, through April 10, 2020, acting as a profiteer, did knowingly and unlawfully possess, on one or more occasions within six months or less, a narcotic drug with the intent to sell the same, and such narcotic drugs have a total aggregate value of seventy-five thousand dollars or more.

### COUNT 302

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHAWN DELMORE, of the crime of OPERATING AS A MAJOR TRAFFICKER, in violation of Section 220.77(3) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHAWN DELMORE, acting in concert with others, in Bronx County, and elsewhere in and outside of the State of New York, on or about October 25, 2019, through April 10, 2020, acting as a profiteer, did knowingly and unlawfully possess, on one or more occasions within six months or less, a narcotic drug with the intent to sell the same, and such narcotic drugs have a total aggregate value of seventy-five thousand dollars or more.

COUNT 303

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, SHARROD THORTON, of the crime of OPERATING AS A MAJOR TRAFFICKER, in violation of Section 220.77(3) of the Penal Law of the State of New York, committed as follows:

That the said defendant, SHARROD THORTON, acting in concert with others, in Bronx County, and elsewhere in and outside of the State of New York, on or about October 25, 2019, through April 10, 2020, acting as a profiteer, did knowingly and unlawfully possess, on one or more occasions within six months or less, a narcotic drug with the intent to sell the same, and such narcotic drugs have a total aggregate value of seventy-five thousand dollars or more.

Dated: October \_\_\_, 2020

Saratoga, New York

\_\_\_\_\_  
Grand Jury Foreperson

NICOLE KEARY  
Deputy Attorney General  
N.Y.S. Attorney General's Organized Crime Task Force

By: \_\_\_\_\_  
Andrew McElwee  
Assistant Deputy Attorney General  
N.Y.S. Attorney General's Organized Crime Task Force