

COUNTY COURT: COUNTY OF ORANGE  
STATE OF NEW YORK

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THE PEOPLE OF THE STATE OF NEW YORK

**IND. #2018-112**

-against-

MONIQUE BENTLEY, a.k.a. "Cola;"  
FREDERICK BLUE, a.k.a. "Fredo;"  
JOHN BOUGHTON;  
TYKWON BURKS, a.k.a. "Chop;"  
STEVE COHEN, a.k.a. "Lonkie;"  
ADRIAN HUTCHINSON, a.k.a. "Travis;"  
ANDREW HUTCHINSON, a.k.a. "Jimmy;"  
DAMION JACKSON, a.k.a. "Toe Toe;"  
DEMETRIUS KELLY, a.k.a. "Meech;"  
KEVIN MALDONADO, a.k.a. "Kels;"  
KENNY MALDONADO-IRIZARRY, a.k.a. "Ken Block;"  
ONEIL MITCHELL, a.k.a. "O;"  
KENNEDY RICHARDS, a.k.a. "Prezzy;"  
ETHAN SANTANA, a.k.a. "Edai," a.k.a. "L.A.;"  
DWAINE TATE, a.k.a. "Devil;" and  
DWAINE WATSON, a.k.a. "Short Boss," a.k.a "Slash;"

DEFENDANTS.

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**COUNT 1**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, MONIQUE BENTLEY, a.k.a. "Cola" (hereinafter "MONIQUE BENTLEY"), FREDERICK BLUE, a.k.a. "Fredo" (hereinafter "FREDERICK BLUE"), JOHN BOUGHTON, TYKWON BURKS, a.k.a. "Chop" (hereinafter "TYKWON BURKS"), STEVE COHEN, a.k.a. "Nankie" (hereinafter "STEVE COHEN"), ADRIAN HUTCHINSON, a.k.a. "Travis" (hereinafter "ADRIAN HUTCHINSON"), ANDREW HUTCHINSON, a.k.a. "Jimmy" (hereinafter "ANDREW HUTCHINSON"), DAMION JACKSON, a.k.a. "Toe Toe" (hereinafter "DAMION JACKSON"), DEMETRIUS KELLY, a.k.a. "Meech" (hereinafter "DEMETRIUS KELLY"),

KEVIN MALDONADO, a.k.a. “Kels” (hereinafter “KEVIN MALDONADO”), KENNY MALDONADO-IRIZARRY, a.k.a. “Ken Block” (hereinafter “KENNY MALDONADO”), ONEIL MITCHELL, a.k.a. “O” (hereinafter “ONEIL MITCHELL”), KENNEDY RICHARDS, a.k.a. “Prezzy” (hereinafter “KENNEDY RICHARDS”), ETHAN SANTANA, a.k.a. “Edai,” a.k.a. “L.A.” (hereinafter “ETHAN SANTANA”), DWAIN TATE, a.k.a. “Devil” (hereinafter “DWAIN TATE”), DWAIN WATSON, a.k.a. “Short Boss,” a.k.a. “Slash” (hereinafter “DWAIN WATSON”), 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 Orange County, Ulster County, and elsewhere in and outside of the State of New York, from on or before April 1, 2017, until on or about November 3, 2017, with intent that conduct constituting the crimes of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21 of the Penal Law of the State of New York, and/or **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43 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 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 overall conspiracy to obtain, possess, and control quantities of narcotics in amounts greater than four ounces or more, and to sell narcotics in amounts greater than one-half ounce or more in Orange County, Ulster County, and elsewhere in the State of New York, and the State of New Jersey, and to collect the proceeds from those narcotics transactions.

It was the purpose of this conspiracy to obtain, possess, and control quantities of heroin and/or cocaine and to sell those narcotics in Orange County, Ulster County, and elsewhere in the State of New York and to collect the proceeds from those narcotics transactions.

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.

On or about and between April 1, 2017, and November 3, 2017, and during the course of the investigation, we identified the following members of this Narcotics Distribution Operation, as well as their role within this Narcotics Distribution Organization:

It was part of this conspiracy for KENNEDY RICHARDS to supply consistently cocaine from Paterson, New Jersey, to DWAIN WATSON, DWAIN TATE, and ANDREW HUTCHINSON, and others, for further distribution to locations within and outside of Orange County.

It was part of this conspiracy for DWAIN TATE to obtain cocaine from KENNEDY RICHARDS and then to re-sell that cocaine to approximately ten customers including, but not limited to, ONEIL MITCHELL, and DAMION JACKSON.

It was part of this conspiracy for ANDREW HUTCHINSON to obtain cocaine from KENNEDY RICHARDS and then to re-sell that cocaine to approximately ten customers including, but not limited to, ADRIAN HUTCHINSON and STEVE COHEN. It was also part of this

conspiracy for ANDREW HUTCHINSON to work with DAMION JACKSON in the the purchase, transportation, and resale of heroin to various customers in Orange County.

It was part of this conspiracy for DWAIN WATSON to obtain cocaine from KENNEDY RICHARDS and then to re-sell that cocaine to several customers in Orange County and elsewhere.

It was part of this conspiracy for ADRIAN HUTCHINSON to obtain cocaine from ANDREW HUTCHINSON and then to re-sell that cocaine to approximately ten to fifteen customers.

It was part of this conspiracy for ONEIL MITCHELL to obtain cocaine from ANDREW HUTCHINSON and DWAIN TATE and then to re-sell that cocaine to approximately ten to fifteen customers.

It was part of this conspiracy for DAMION JACKSON to obtain cocaine from DWAIN TATE and others, and then to re-sell that cocaine to approximately ten customers including, but not limited to, JOHN BOUGHTON and others. It was also part of this conspiracy for DAMION JACKSON to obtain heroin from unknown individuals, and then to re-sell that heroin to approximately over twenty customers, including but not limited to, JOHN BOUGHTON, FREDERICK BLUE, MONIQUE BENTLEY, and KEVIN MALDONADO.

It was part of this conspiracy for STEVE COHEN to obtain heroin from multiple individuals so he could maintain a steady supply, and then to re-sell that heroin to over five customers, including but not limited to, FREDERICK BLUE, MONIQUE BENTLEY, and KEVIN MALDONADO. It was also part of this conspiracy for STEVE COHEN to obtain cocaine from ANDREW HUTCHINSON, and then to re-sell that cocaine to unknown customers.

It was part of this conspiracy for JOHN BOUGHTON to obtain heroin and cocaine from DAMION JACKSON and then to re-sell that heroin and cocaine to approximately five customers in Ulster County, New York and elsewhere.

It was part of this conspiracy for FREDERICK BLUE to obtain heroin from STEVE COHEN, DAMION JACKSON, and others, and then to re-sell that heroin to over twenty customers, including but not limited to MONIQUE BENTLEY, KEVIN MALDONADO, KENNY MALDONADO, TYKWON BURKS, and ETHAN SANTANA in and around the City of Newburgh, New York and elsewhere.

It was part of this conspiracy for MONIQUE BENTLEY to obtain heroin from STEVE COHEN, DAMION JACKSON, FREDERICK BLUE and others, and then to re-sell that heroin to approximately over fifteen customers, including but not limited to TYKWON BURKS, ETHAN SANTANA, and DEMETRIUS KELLY in and around the City of Newburgh, New York and elsewhere.

It was part of this conspiracy for KEVIN MALDONADO to obtain heroin from STEVE COHEN, DAMION JACKSON and others, and then to re-sell that heroin to approximately over twenty-five customers, including but not limited to MONIQUE BENTLEY, KENNY MALDONADO, TYKWON BURKS, ETHAN SANTANA, and DEMETRIUS KELLY, in and around the City of Newburgh, New York and elsewhere.

It was part of this conspiracy for KENNY MALDONADO to obtain heroin from KEVIN MALDONADO and others, and to conduct street-level resale of heroin to over five customers in and around the City of Newburgh, New York and elsewhere.

It was part of this conspiracy for TYKWON BURKS to obtain heroin from FREDERICK BLUE, MONIQUE BENTLEY, KEVIN MALDONADO and others, and to conduct street-level

resale of heroin to over twenty customers in and around the City of Newburgh, New York and elsewhere.

It was part of this conspiracy for DEMETRIUS KELLY to obtain heroin from MONIQUE BENTLEY, KEVIN MALDONADO and others, and to resell heroin to over fifteen customers in and around the City of Newburgh, New York and elsewhere.

It was part of this conspiracy for ETHAN SANTANA to obtain heroin from FREDERICK BLUE, MONIQUE BENTLEY, KEVIN MALDONADO and others, and to conduct street-level resale of heroin to over eight customers in and around the City of Newburgh, New York and elsewhere.

It was part of this conspiracy for FREDERICK BLUE, KEVIN MALDONADO, KENNY MALDONADO and others, to possess firearms for protection in furtherance of their narcotics trafficking in and around the City of Newburgh, New York and elsewhere.

### **OVERT ACTS**

In the furtherance of the conspiracy and to affect the objects thereof, from on or before approximately April 1, 2017, through on or about November 3, 2017, the following overt acts, among others, were committed:

1. On or about and between April 1, 2017 and October 31, 2017, FREDERICK BLUE, MONIQUE BENTLEY, and KEVIN MALDONADO utilized an apartment within 127 Fullerton Avenue in the City of Newburgh to package and stash heroin destined for street-level sale, as well as possess the proceeds of those street-level sales of heroin.

2. On or about April 18, 2017, KEVIN MALDONADO possessed and sold a sawed-off shotgun to another individual inside of 127 Fullerton Avenue in the City of Newburgh.

3. On or about May 3, 2017, KEVIN MALDONADO and FREDERICK BLUE possessed and sold a .12-gage shotgun to another individual in the City of Newburgh, New York.

4. On or about May 17, 2017, ETHAN SANTANA sold heroin to a person known to the Grand Jury.

5. On or about June 1, 2017, ETHAN SANTANA sold heroin to a person known to the Grand Jury.

6. On or about and between June 13, 2017 and September 8, 2017, FREDERICK BLUE and MONIQUE BENTLEY utilized a 2005 blue-colored MERCEDES to transport heroin and cocaine in the City of Newburgh, New York.

7. On or about June 15, 2017, KEVIN MALDONADO packaged a bundle of alleged heroin for re-sale, which bundle of alleged heroin TYKWON BURKS then sold to another individual in exchange for \$80.

8. On or about June 17, 2017, TYKWON BURKS sought to purchase heroin from KEVIN MALDONADO.

9. On or about June 17, 2017, KEVIN MALDONADO possessed alleged heroin that was not yet packaged (“bagged up”) for street re-sale.

10. On or about June 24, 2017, after being notified by ETHAN SANTANA that ETHAN SANTANA had a customer waiting, FREDERICK BLUE instructed MONIQUE BENTLEY to deliver four bags of alleged heroin to ETHAN SANTANA.

11. On or about June 24, 2017, FREDERICK BLUE instructed MONIQUE BENTLEY to deliver fifteen bags of alleged heroin and three bags of alleged heroin stamped “Public Enemy” to a waiting customer.

12. On or about June 29, 2017, TYKWON BURKS had a conversation with an unknown individual seeking to obtain a handgun (“pole”).

13. On or about June 30, 2017, after being notified by ETHAN SANTANA that ETHAN SANTANA had a customer waiting, FREDERICK BLUE arranged to deliver alleged heroin to ETHAN SANTANA, including one bag stamped “Public Enemy.”

14. On or about July 13, 2017, July 27, 2017, September 5, 2017, and September 19, 2017, DAMION JACKSON supplied heroin to individuals who delivered the heroin to a person known to the Grand Jury.

15. On or about July 13, 2017, July 20, 2017, July 27, 2017, August 9, 2017, August 15, 2017, and August 22, 2017, FREDERICK BLUE sold heroin to a person known to the Grand Jury.

16. On or about July 13, 2017, August 22, 2017, August 29, 2017, and September 5, 2017, MONIQUE BENTLEY sold heroin to a person known to the Grand Jury

17. On or about July 16, 2017, KEVIN MALDONADO and KENNY MALDONADO possessed a firearm inside of 127 Fullerton Avenue in the City of Newburgh, New York.

18. On or about and between July 18, 2017, and July 20, 2017, STEVE COHEN and DAMION JACKSON sold alleged heroin to FREDERICK BLUE.

19. On or about July 27, 2017, FREDERICK BLUE directed another individual to package heroin into individual white glassine envelopes for street re-sale.

20. On two occasions on or about and between July 29, 2017, and July 31, 2017, FREDERICK BLUE agreed to sell multiple bundles of alleged heroin to TYKWON BURKS in order that TYKWON BURKS could re-sell them to waiting customers in the City of Newburgh.



21. On or about August 8, 2017, STEVE COHEN and DAMION JACKSON had conversations in which they discussed the quality and trustworthiness of their mutual narcotics suppliers, and an unknown individual who was conducting surveillance of narcotics traffickers in and around the City of Newburgh.

22. On or about August 8, 2017, STEVE COHEN sold approximately twenty grams of heroin to MONIQUE BENTLEY.

23. On or about August 8, 2017, MONIQUE BENTLEY possessed approximately twenty grams of heroin in the City of Newburgh.

24. On or about August 8, 2017, MONIQUE BENTLEY possessed \$7,600 in drug proceeds in the City of Newburgh.

25. On or about August 8, 2017, MONIQUE BENTLEY possessed drug packaging paraphernalia, to wit: two boxes of unused glassine envelopes stamped "Focus" in the City of Newburgh.

26. On or about August 9, 2017, August 29, 2017, September 5, 2017, September 19, 2017 and September 28, 2017, KEVIN MALDONADO sold heroin to a person known to the Grand Jury.

27. On or about August 13, 2017, KEVIN MALDONADO possessed a firearm in the City of Newburgh, New York.

28. On or about August 20, 2017, KEVIN MALDONADO and FREDERICK BLUE had a conversation wherein KEVIN MALDONADO rejected an offer of less than \$900 for a handgun ("pole") in the City of Newburgh, New York.

29. On or about August 25, 2017, ETHAN SANTANA sold ten glassine envelopes containing a powdery substance purported to be heroin to a person known to the Grand Jury in exchange for \$60 and said substance was later determined to contain no controlled substance.

30. On or about August 25, 2017, TYKWON BURKS and ETHAN SANTANA sold two glassine envelopes containing a powdery substance purported to be heroin to a person known to the Grand Jury in exchange for \$20 and said substance was later determined to contain no controlled substance.

31. On or about August 28, 2017, and August 30, 2017, TYKWON BURKS sold heroin to a person known to the Grand Jury.

32. On or about September 4, 2017, ANDREW HUTCHINSON possessed at least one scale to be used for weighing cocaine and preparing it for re-sale in the City of Newburgh.

33. On or about September 5, 2017, DEMETRIUS KELLY sold heroin to a person known to the Grand Jury.

34. On or about September 5, 2017, DAMION JACKSON sold approximately ten grams of alleged heroin to KEVIN MALDONADO.

35. On or about September 5, 2017, ANDREW HUTCHINSON agreed to sell an amount of alleged cocaine (“one and a half”) to an unknown customer in the City of Newburgh.

36. On or about and between September 5, 2017 and September 10, 2017, ANDREW HUTCHINSON and DAMION JACKSON utilized a 2013 White-colored BMW bearing New York Registration HTW9214 to transport heroin and cocaine, in the City of Newburgh.

37. On or about September 15, 2017, September 16, 2017, September 22, 2017, September 26, 2017 and September 30, 2017, JOHN BOUGHTON arranged to purchase heroin

and/or cocaine from DAMION JACKSON for the purpose of re-selling some or all of the alleged heroin and cocaine to his own customers.

38. On or about and between September 15, 2017 and September 16, 2017, DAMION JACKSON, KEVIN MALDONADO, MONIQUE BENTLEY and DEMETRIUS KELLY, possessed and sold alleged heroin and that said heroin was stamped “shine” and “X-men.”

39. On or about September 19, 2017, ADRIAN HUTCHINSON had a conversation with ANDREW HUTCHINSON wherein ADRIAN HUTCHINSON indicated that he had an unknown customer who wanted to purchase ½ of an ounce (a “half-piece”) of alleged cocaine.

40. On or about September 19, 2017 ANDREW HUTCHINSON utilized a 2013 White-colored BMW bearing New York Registration HTW9214 to transport several ounces of alleged cocaine between a location controlled by KENNEDY RICHARDS in Paterson, New Jersey and the City of Newburgh, New York.

41. On or about September 25, 2017, KENNY MALDONADO and KEVIN MALDONADO purchased a black revolver handgun for \$270 from a seller known only as Tyron.

42. On or about September 30, 2017, ANDREW HUTCHINSON cooked a quantity of cocaine into crack-cocaine.

43. On or about October 1, 2017, KENNEDY RICHARDS arranged to sell a quantity of cocaine to DWAIN WATSON and ANDREW HUTCHINSON.

44. On or about October 5, 2017, DAMION JACKSON sold approximately ½ gram of cocaine and approximately 35 glassine envelopes containing heroin to JOHN BOUGHTON.

45. On or about October 5, 2017, JOHN BOUGHTON possessed approximately ½ gram of cocaine and approximately 35 glassine envelopes containing heroin.

46. On or about October 10, 2017, ADRIAN HUTCHINSON offered to sell a quantity of cocaine (“three”) to a customer known only as “Mark.”

47. On or about October 10, 2017, ADRIAN HUTCHINSON obtained a quantity of alleged cocaine and cooked it into crack-cocaine at a location within the City of Newburgh.

48. On or about October 12, 2017, ONEIL MITCHELL sold cocaine to another individual at or near 1 Pepsi Way in the City of Newburgh, New York.

49. On or about October 12, 2017, ONEIL MITCHELL utilized a 2008 AUDI bearing New York Registration MPJ9846 to transport, possess and sell cocaine to another individual at or near 1 Pepsi Way in the City of Newburgh, New York.

50. On or about October 16, 2017, DWAIN TATE sold over ½ of an ounce of cocaine to ONEIL MITCHELL.

51. On or about October 16, 2017, ONEIL MITCHELL possessed over ½ of an ounce of cocaine.

52. On or about October 16, 2017, ONEIL MITCHELL utilized a LEXUS sedan bearing temporary New Jersey registration, to transport five bags of cocaine weighing approximately over ½ of an ounce of cocaine from the home of DWAIN TATE at or near his home on Kenny Court in the City of Newburgh to a Sunoco Gas station in the City of Newburgh, New York.

53. On or about October 17, 2017, ONEIL MITCHELL offered to sell cocaine to an unknown male individual known only as “Kim.”

54. On or about October 17, 2017, KEVIN MALDONADO and KENNY MALDONADO possessed a loaded .32 S&W Long caliber revolver, and a loaded Taurus .9mm pistol inside 67 Fullerton Avenue in the City of Newburgh, New York.

55. On or about October 17, 2017, KENNY MALDONADO possessed a loaded Springfield Armory 9 x 19 caliber pistol inside 67 Fullerton Avenue in the City of Newburgh, New York.

56. On or about October 17, 2017, KEVIN MALDONADO and KENNY MALDONADO possessed approximately \$28,800 in drug proceeds inside 67 Fullerton Avenue in the City of Newburgh, New York.

57. On or about October 17, 2017, KENNEDY RICHARDS sold approximately eleven ounces of cocaine to DWAIN TATE, DWAIN WATSON and ANDREW HUTCHINSON.

58. On or about October 17, 2017, DWAIN WATSON possessed approximately eleven ounces of cocaine.

59. On or about October 20, 2017, DWAIN TATE sold cocaine to an individual whose identity is known to the Grand Jury.

60. On or about October 24, 2017, DWAIN TATE sold cocaine to an individual whose identity is known to the Grand Jury.

61. On or about October 21, 2017, ONEIL MITCHELL agreed to sell a quantity of alleged cocaine (described as a "40-piece" of crack-cocaine) to an unknown male customer and used a "runner" to deliver the "40-piece" of crack-cocaine to the unknown male customer.

62. On or about October 21, 2017, ADRIAN HUTCHINSON and DWAIN TATE had a conversation wherein they discussed having to use physical force ("stepping on necks") of their cocaine customers and/or co-conspirators who fail to pay or attempt to steal from them.

63. On or about October 21, 2017, ANDREW HUTCHINSON met DWAIN WATSON in the City of Newburgh, New York, to discuss the loss of eleven ounces of cocaine

KENNEDY RICHARDS had sold to DWAINÉ WATSON, ANDREW HUTCHINSON and DWAINÉ TATE on or about October 17, 2017.

64. On or about October 27, 2017, KENNEDY RICHARDS and ANDREW HUTCHINSON met at the Woodbury Commons Outlet Stores in Orange County, New York, to discuss the loss of eleven ounces of cocaine KENNEDY RICHARDS had sold to DWAINÉ WATSON, ANDREW HUTCHINSON and DWAINÉ TATE on or about October 17, 2017.

65. On approximately fifteen to twenty occasions on or about and between April 1, 2017, and November 3, 2017, KENNEDY RICHARDS sold between approximately three ounces and ½ kilogram of alleged cocaine to a person known to the Grand Jury and others.

66. On or about and between June 13, 2017 and August 24, 2017, FREDERICK BLUE utilized a cellular telephone assigned telephone number (845) 245-9195 (hereinafter the "FREDERICK BLUE cellular telephone") and a cellular telephone assigned telephone number (845) 670-9462 to make arrangements for multiple sales of heroin in the City of Newburgh and elsewhere in the State of New York.

67. On or about and between August 24, 2017 and September 8, 2017, MONIQUE BENTLEY utilized the FREDERICK BLUE cellular telephone and a cellular telephone assigned telephone number (845) 670-9462 to make arrangements for multiple sales of heroin in the City of Newburgh and elsewhere in the State of New York.

68. On or about and between June 13, 2017 and September 8, 2017, MONIQUE BENTLEY utilized the cellular telephone assigned telephone number (845) 670-9741 to make arrangements for multiple sales of heroin in the City of Newburgh and elsewhere in the State of New York.

69. On or about and between September 1, 2017 and October 10, 2017, JOHN BOUGHTON utilized the cellular telephone assigned telephone number (845) 332-9606 to make arrangements for sales of heroin in Orange and Ulster Counties and elsewhere in the State of New York.

70. On or about and between June 13, 2017 and September 8, 2017, TYKWON BURKS utilized the cellular telephone assigned telephone number (845) 764-3648 to make arrangements for multiple sales of heroin in the City of Newburgh and elsewhere in the State of New York.

71. On or about and between August 1, 2017 and October 30, 2017, STEVE COHEN utilized the cellular telephone assigned telephone number (845) 541-5646 to make arrangements for multiple sales of heroin and cocaine in the City of Newburgh and elsewhere in the State of New York.

72. On or about and between August 1, 2017 and November 3, 2017, ADRIAN HUTCHINSON utilized the cellular telephone assigned telephone number (845) 670-2174 to make arrangements for multiple sales of cocaine in the City of Newburgh and elsewhere in the State of New York.

73. On or about and between July 1, 2017 and November 3, 2017, ANDREW HUTCHINSON utilized the cellular telephone assigned telephone number (845) 500-5984 to make arrangements for multiple sales of cocaine and heroin in the City of Newburgh and elsewhere in the State of New York.

74. On or about and between June 13, 2017 and October 6, 2017, DAMION JACKSON utilized the cellular telephones assigned telephone numbers (845) 542-5537 and (347) 835-7594

to make arrangements for multiple sales of heroin and cocaine in the City of Newburgh and elsewhere in the State of New York.

75. On or about and between July 20, 2017 and October 6, 2017, DEMETRIUS KELLY utilized the cellular telephone assigned telephone number (845) 219-8818 to make arrangements for multiple sales of heroin in the City of Newburgh and elsewhere in the State of New York.

76. On or about and between June 13, 2017 and October 15, 2017, KEVIN MALDONADO utilized the cellular telephone assigned telephone number (845) 764-6665 to make arrangements for multiple sales of heroin in the City of Newburgh and elsewhere in the State of New York.

77. On or about and between July 15, 2017 and October 20, 2017, KENNY MALDONADO utilized the cellular telephone assigned telephone number (646) 683-0306 to make arrangements for multiple sales of heroin in the City of Newburgh and elsewhere in the State of New York.

78. On or about and between July 20, 2017 and November 3, 2017, ONEIL MITCHELL utilized the cellular telephone assigned telephone number (347) 824-1650 to make arrangements for multiple sales of cocaine in the City of Newburgh and elsewhere in the State of New York.

79. On or about and between October 26, 2017 and November 3, 2017, KENNEDY RICHARDS utilized the cellular telephones assigned telephone numbers (862) 899-0706, (862) 287-4673, and (973) 997-5128 to make arrangements for multiple sales of cocaine destined for the City of Newburgh and elsewhere in the State of New York.



80. On or about and between May 15, 2017 and October 6, 2017, ETHAN SANTANA utilized the cellular telephones assigned telephone numbers (914) 863-4225 and (845) 531-1743 to make arrangements for multiple sales of heroin in the City of Newburgh and elsewhere in the State of New York.

81. On or about and between September 1, 2017 and November 3, 2017, DWAIN TATE utilized the cellular telephone assigned telephone number (845) 375-5361 to make arrangements for multiple sales of cocaine in the City of Newburgh and elsewhere in the State of New York.

82. On or about and between September 1, 2017 and November 3, 2017, DWAIN WATSON utilized the cellular telephone assigned telephone number (845) 375-5361 to make arrangements for multiple sales of cocaine in the City of Newburgh and elsewhere in the State of New York.

## **COUNT 2**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KENNEDY RICHARDS, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 14<sup>th</sup> day of October, 2017, and the 17<sup>th</sup> day of October 2017, in Paterson, New Jersey, Orange County, New York, and elsewhere in the State of New York, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

**COUNT 3**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KENNEDY RICHARDS, DWAIN WATSON, ANDREW HUTCHINSON, and DWAIN TATE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE in violation of §220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 14<sup>th</sup> day of October, 2017, and the 17<sup>th</sup> day of October 2017, in Paterson, New Jersey, Orange County, New York, and elsewhere in the State of New York, 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 4**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KENNEDY RICHARDS, DWAIN WATSON, ANDREW HUTCHINSON, and DWAIN TATE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 14<sup>th</sup> day of October, 2017, and the 17<sup>th</sup> day of October 2017, in Paterson, New Jersey, Orange County, New York, and elsewhere in the State of New York, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

### **COUNT 5**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DWAIN TATE, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE in violation of §220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 16<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

### **COUNT 6**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DWAIN TATE, and ONEIL MITCHELL, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 16<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with intent to sell it.

### **COUNT 7**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DWAIN TATE, and ONEIL MITCHELL, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN

THE THIRD DEGREE in violation of §220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 16<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 8**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DWAIN TATE, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE in violation of §220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 20<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 9**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DWAIN TATE, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 20<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with intent to sell it.

**COUNT 10**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DWAIN TATE, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 20<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 11**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DWAIN TATE, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE in violation of §220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 24<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 12**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DWAIN TATE, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 24<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with intent to sell it.

**COUNT 13**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DWAIN TATE, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 24<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 14**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KENNEDY RICHARDS, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 18<sup>th</sup> day of August, 2017, and the 20<sup>th</sup> day of August 2017, in Paterson, New Jersey, Orange County, New York, and elsewhere in the State of New York, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

**COUNT 15**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KENNEDY RICHARDS, ANDREW HUTCHINSON, and DWAIN WATSON, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 18<sup>th</sup> day of August, 2017, and the 20<sup>th</sup> day of August 2017, in Paterson, New Jersey, Orange County, New York, and elsewhere in the State of New York, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 16**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KENNEDY RICHARDS, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 16<sup>th</sup> day of September, 2017, and the 17<sup>th</sup> day of September 2017, in Paterson, New Jersey, Orange County, New York, and elsewhere in the State of New York, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

**COUNT 17**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ANDREW HUTCHINSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE in violation of §220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 17<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 18**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ANDREW HUTCHINSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE in violation of §220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 17<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances



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

**COUNT 19**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ANDREW HUTCHINSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 17<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 20**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KENNEDY RICHARDS, ANDREW HUTCHINSON, ADRIAN HUTCHINSON, STEVE COHEN, DWAIN WATSON, and ONEIL MITCHELL, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 16<sup>th</sup> day of September, 2017, and the 17<sup>th</sup> day of September 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 21**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KENNEDY RICHARDS, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 18<sup>th</sup> day of September, 2017, and the 19<sup>th</sup> day of September 2017, in Paterson, New Jersey, Orange County, New York, and elsewhere in the State of New York, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

**COUNT 22**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ANDREW HUTCHINSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 18<sup>th</sup> day of September, 2017, and the 19<sup>th</sup> day of September 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 23**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KENNEDY RICHARDS, ANDREW HUTCHINSON, ADRIAN HUTCHINSON, and DWAIN

WATSON, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 18<sup>th</sup> day of September, 2017, and the 19<sup>th</sup> day of September 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 24**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DWAIN WATSON, and DWAIN TATE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE in violation of §220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 26<sup>th</sup> day of September, 2017, and the 18<sup>th</sup> day of October 2017, Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

**COUNT 25**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DWAIN TATE, of committing the crime of CRIMINAL SALE OF A CONTROLLED

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

Said defendant, on or about the 26<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 26**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DWAIN WATSON, and DWAIN TATE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 26<sup>th</sup> day of September, 2017, and the 18<sup>th</sup> day of October 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 27**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KENNEDY RICHARDS, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE in violation of §220.43(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 30<sup>th</sup> day of September, 2017, and the 2<sup>nd</sup> day of October 2017, in Paterson, New Jersey, Orange County, New York, and elsewhere in the State of New York, did knowingly and unlawfully sell one or more preparations, compounds, mixtures

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

**COUNT 28**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ANDREW HUTCHINSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE in violation of §220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 30<sup>th</sup> day of September, 2017, and the 2<sup>nd</sup> day of October 2017, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 29**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KENNEDY RICHARDS, ANDREW HUTCHINSON, ADRIAN HUTCHINSON, ONEIL MITCHELL, and DWAIN WATSON, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 30<sup>th</sup> day of September, 2017, and the 2<sup>nd</sup> day of October 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 30**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, STEVE COHEN, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE in violation of §220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 8<sup>th</sup> day of August, 2017, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 31**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, STEVE COHEN, FREDERICK BLUE, and MONIQUE BENTLEY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 8<sup>th</sup> day of August, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 32**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, STEVE COHEN, FREDERICK BLUE and MONIQUE BENTLEY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 8<sup>th</sup> day of August, 2017, in Orange County, 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-half ounce or more.

**COUNT 33**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, MONIQUE BENTLEY, and FREDERICK BLUE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE in violation of §220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 24<sup>th</sup> day of August, 2017, and the 29<sup>th</sup> day of August, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 34**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, MONIQUE BENTLEY, and FREDERICK BLUE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 24<sup>th</sup> day of August, 2017, and the 29<sup>th</sup> day of August 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin.

**COUNT 35**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, MONIQUE BENTLEY, and FREDERICK BLUE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 24<sup>th</sup> day of August, 2017, and the 29<sup>th</sup> day of August, 2017, in Orange County, 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-half ounce or more.



**COUNT 36**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, KEVIN MALDONADO, FREDERICK BLUE, MONIQUE BENTLEY, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE in violation of §220.41(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 5<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

**COUNT 37**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, KEVIN MALDONADO, FREDERICK BLUE, MONIQUE BENTLEY, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 5<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 38**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, KEVIN MALDONADO, FREDERICK BLUE, MONIQUE BENTLEY, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 5<sup>th</sup> day of September, 2017, in Orange County, 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-half ounce or more.

**COUNT 39**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, FREDERICK BLUE, and MONIQUE BENTLEY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 13<sup>th</sup> day of July, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 40**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, FREDERICK BLUE, and MONIQUE BENTLEY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 13<sup>th</sup> day of July, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with intent to sell it.

**COUNT 41**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, and STEVE COHEN, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 18<sup>th</sup> day of July, 2017, and the 20<sup>th</sup> day of July 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 42**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, FREDERICK BLUE, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 19<sup>th</sup> day of July, 2017, and the 20<sup>th</sup> day of July 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 43**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, FREDERICK BLUE, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 19<sup>th</sup> day of July, 2017, and the 20<sup>th</sup> day of July 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with intent to sell it.

**COUNT 44**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, and FREDERICK BLUE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 25<sup>th</sup> day of July, 2017, and the 27<sup>th</sup> day of July 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 45**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, and FREDERICK BLUE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 25<sup>th</sup> day of July, 2017, and the 27<sup>th</sup> day of July 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with intent to sell it.

**COUNT 46**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, FREDERICK BLUE, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 8<sup>th</sup> day of August, 2017, and the 9<sup>th</sup> day of August 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin, Fentanyl, and Morphine.

**COUNT 47**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, FREDERICK BLUE, of committing the crime of CRIMINAL SALE OF A CONTROLLED

SUBSTANCE IN THE FIFTH DEGREE in violation of §220.31 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 8<sup>th</sup> day of August, 2017, and the 9<sup>th</sup> day of August 2017, in Orange County, did knowingly and unlawfully sell a controlled substance, to wit, Ketamine.

**COUNT 48**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, FREDERICK BLUE and KEVIN MALDONADO, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 8<sup>th</sup> day of August, 2017, and the 9<sup>th</sup> day of August 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, Morphine, and Fentanyl with intent to sell it.

**COUNT 49**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, FREDERICK BLUE and KEVIN MALDONADO, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE in violation of §220.09(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 8<sup>th</sup> day of August, 2017, and the 9<sup>th</sup> day of August 2017, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Heroin, Morphine, and Fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

**COUNT 50**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, FREDERICK BLUE, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 15<sup>th</sup> day of August, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Morphine and Fentanyl.

**COUNT 51**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, FREDERICK BLUE, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE in violation of §220.31 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 15<sup>th</sup> day of August 2017, in Orange County, did knowingly and unlawfully sell a controlled substance, to wit, Ketamine.

**COUNT 52**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, FREDERICK BLUE, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 15<sup>th</sup> day of August, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Morphine and Fentanyl with intent to sell it.

**COUNT 53**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, FREDERICK BLUE, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE in violation of §220.09(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 15<sup>th</sup> day of August, 2017, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Morphine and Fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

**COUNT 54**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, FREDERICK BLUE, and MONIQUE BENTLEY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN



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

Said defendants, on or about and between the 20<sup>th</sup> day of August, 2017, and the 22<sup>nd</sup> day of August 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin and Morphine.

**COUNT 55**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, FREDERICK BLUE and MONIQUE BENTLEY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 20<sup>th</sup> day of August, 2017, and the 22<sup>nd</sup> day of August 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin and Morphine, with intent to sell it.

**COUNT 56**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, FREDERICK BLUE, and MONIQUE BENTLEY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE in violation of §220.09(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 20<sup>th</sup> day of August, 2017, and the 22<sup>nd</sup> day of August, 2017, in Orange County, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Heroin and Morphine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

**COUNT 57**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, and STEVE COHEN, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 23<sup>rd</sup> day of June 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 58**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, STEVE COHEN, and FREDERICK BLUE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 23<sup>rd</sup> day of June, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 59**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, STEVE COHEN, and FREDERICK BLUE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 25<sup>th</sup> day of June 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 60**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, STEVE COHEN, and FREDERICK BLUE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 25<sup>th</sup> day of June, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 61**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DAMION JACKSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED

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

Said defendant, on or about the 6<sup>th</sup> day of July 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 62**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, and FREDERICK BLUE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 6<sup>th</sup> day of July, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 63**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DAMION JACKSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 7<sup>th</sup> day of July 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 64**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, and FREDERICK BLUE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 7<sup>th</sup> day of July, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 65**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DAMION JACKSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 10<sup>th</sup> day of July 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 66**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, and FREDERICK BLUE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 10<sup>th</sup> day of July, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 67**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 18<sup>th</sup> day of April, 2017, in Orange County, did sell, exchange, give or dispose of a firearm to another person, to wit, a Remington shotgun having one or more barrels less than eighteen inches in length.

**COUNT 68**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL POSSESSION OF A FIREARM in violation of §265.01-b of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 18<sup>th</sup> day of April, 2017, in Orange County, did possess a firearm, to wit, a Remington shotgun having one or more barrels less than eighteen inches in length.

**COUNT 69**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL POSSESSION OF A WEAPON

IN THE FOURTH DEGREE in violation of §265.01 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 18<sup>th</sup> day of April, 2017, in Orange County, did possess a firearm, to wit, a Remington shotgun having one or more barrels less than eighteen inches in length.

**COUNT 70**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1<sup>st</sup> day of September 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 71**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1<sup>st</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 72**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 4<sup>th</sup> day of September 2017, and the 5<sup>th</sup> day of September 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 73**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 4<sup>th</sup> day of September 2017, and the 5<sup>th</sup> day of September 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 74**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, KEVIN MALDONADO, KENNY MALDONADO, and ETHAN SANTANA, each aiding and acting in concert with each other, of committing the crime of



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

Said defendants, on or about the 10<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 75**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, KEVIN MALDONADO, KENNY MALDONADO, and ETHAN SANTANA, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 10<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 76**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, MONIQUE BENTLEY, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 10<sup>th</sup> day of September 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 77**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, MONIQUE BENTLEY, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 10<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 78**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KEVIN MALDONADO, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 11<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 79**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KEVIN MALDONADO, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED

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

Said defendants, on or about the 11<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 80**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, KEVIN MALDONADO, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 12<sup>th</sup> day of September, 2017, and the 13<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 81**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, KEVIN MALDONADO, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 12<sup>th</sup> day of September, 2017, and the 13<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 82**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, and KEVIN MALDONADO, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 13<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 83**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, KEVIN MALDONADO, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 13<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 84**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, KEVIN MALDONADO, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 14<sup>th</sup> day of September, 2017, and the 15<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 85**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KEVIN MALDONADO, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 15<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 86**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, KEVIN MALDONADO, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A

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

Said defendants, on or about and between the 14<sup>th</sup> day of September, 2017, and the 15<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 87**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, KEVIN MALDONADO, MONIQUE BENTLEY, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 15<sup>th</sup> day of September, 2017, and the 16<sup>th</sup> day of September 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 88**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, KEVIN MALDONADO, MONIQUE BENTLEY, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 15<sup>th</sup> day of September, 2017, and the 16<sup>th</sup> day of September 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 89**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 18<sup>th</sup> day of September 2017, and the 19<sup>th</sup> day of September 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 90**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 18<sup>th</sup> day of September 2017, and the 19<sup>th</sup> day of September 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 91**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KEVIN MALDONADO, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 21<sup>st</sup> day of September, 2017, and the 22<sup>nd</sup> day of September 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 92**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KEVIN MALDONADO, and DEMETRIUS KELLY, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 21<sup>st</sup> day of September, 2017, and the 22<sup>nd</sup> day of September 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 93**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DEMETRIUS KELLY, of committing the crime of CRIMINAL SALE OF A CONTROLLED



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

Said defendant, on or about the 23<sup>rd</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 94**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DEMETRIUS KELLY, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 23<sup>rd</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 95**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 27<sup>th</sup> day of September 2017, and the 28<sup>th</sup> day of September 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 96**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 27<sup>th</sup> day of September 2017, and the 28<sup>th</sup> day of September 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 97**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE in violation of §265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 20<sup>th</sup> day of July, 2017, and the 17<sup>th</sup> day of October, 2017, in Orange County, did possess a loaded firearm, to wit, a 9mm caliber pistol, and such possession took place outside of his home or place of business.

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

**COUNT 98**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL POSSESSION OF A WEAPON

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

Said defendant, on or about and between the 25<sup>th</sup> day of September, 2017, and the 17<sup>th</sup> day of October, 2017, in Orange County, did possess a loaded firearm, to wit, a .32 caliber revolver, and such possession took place outside of his home or place of business.

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

**COUNT 99**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL POSSESSION OF A FIREARM in violation of §265.01-b of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 20<sup>th</sup> day of July, 2017 and the 17<sup>th</sup> day of October, 2017, in Orange County, did possess a firearm, to wit, a 9mm caliber pistol.

**COUNT 100**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KEVIN MALDONADO, of committing the crime of CRIMINAL POSSESSION OF A FIREARM in violation of §265.01-b of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and between the 25<sup>th</sup> day of September 2017, the 17<sup>th</sup> day of October, 2017, in Orange County, did possess a firearm, to wit, a .32 caliber revolver.

**COUNT 101**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KENNY MALDONADO, of committing the crime of CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE in violation of §265.02(5)(i) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 17<sup>th</sup> day of October, 2017, in Orange County, did possess three or more firearms, to wit, a .32 caliber revolver, a 9mm caliber pistol, and a 9 x 19 caliber pistol.

**COUNT 102**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KENNY MALDONADO, along with an unknown individual, each aiding and acting in concert with each, of committing the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE in violation of §265.11(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 25<sup>th</sup> day of September, 2017, in Orange County, did sell, exchange, give or dispose of a firearm to another person, to wit, a .32 caliber revolver.

**COUNT 103**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KENNY MALDONADO, of committing the crime of CRIMINAL POSSESSION OF A

FIREARM in violation of §265.01-b of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 17<sup>th</sup> day of October, 2017, in Orange County, did possess a firearm, to wit, a .32 caliber revolver.

**COUNT 104**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KENNY MALDONADO, of committing the crime of CRIMINAL POSSESSION OF A FIREARM in violation of §265.01-b of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 17<sup>th</sup> day of October, 2017, in Orange County, did possess a firearm, to wit, a .9mm caliber pistol.

**COUNT 105**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, KENNY MALDONADO, of committing the crime of CRIMINAL POSSESSION OF A FIREARM in violation of §265.01-b of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 17<sup>th</sup> day of October, 2017, in Orange County, did possess a firearm, to wit, a 9 x 19 caliber pistol.

**COUNT 106**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KEVIN MALDONADO, KENNY MALDONADO, and ETHAN SANTANA, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 9<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 107**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KEVIN MALDONADO, KENNY MALDONADO, and ETHAN SANTANA, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 9<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 108**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KEVIN MALDONADO, and KENNY MALDONADO, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE

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

Said defendants, on or about the 7<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 109**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KEVIN MALDONADO, and KENNY MALDONADO, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 7<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 110**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KEVIN MALDONADO, and KENNY MALDONADO, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 12<sup>th</sup> day of October, 2017, and the 13<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 111**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, KEVIN MALDONADO, and KENNY MALDONADO, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and between the 12<sup>th</sup> day of October, 2017, and the 13<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 112**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ETHAN SANTANA, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 17<sup>th</sup> day of May, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 113**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ETHAN SANTANA, of committing the crime of CRIMINAL POSSESSION OF A



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

Said defendant, on or about the 17<sup>th</sup> day of May, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 114**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ETHAN SANTANA, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 17<sup>th</sup> day of May, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 115**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ETHAN SANTANA, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1<sup>st</sup> day of June, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 116**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ETHAN SANTANA, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1<sup>st</sup> day of June, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 117**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ETHAN SANTANA, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 8<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 118**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ETHAN SANTANA, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 8<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 119**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ETHAN SANTANA, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 120**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ETHAN SANTANA, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 121**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 28<sup>th</sup> day of August, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 122**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 28<sup>th</sup> day of August, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 123**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 30<sup>th</sup> day of August, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 124**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL POSSESSION OF A

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

Said defendant, on or about the 30<sup>th</sup> day of August, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 125**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 14<sup>th</sup> day of June, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 126**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 14<sup>th</sup> day of June, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 127**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 15<sup>th</sup> day of June, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 128**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 15<sup>th</sup> day of June, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 129**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 15<sup>th</sup> day of June, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 130**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 15<sup>th</sup> day of June, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 131**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 5<sup>th</sup> day of July, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 132**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 5<sup>th</sup> day of July, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 133**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 26<sup>th</sup> day of July, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 134**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 26<sup>th</sup> day of July, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 135**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL SALE OF A CONTROLLED



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

Said defendant, on or about the 27<sup>th</sup> day of July, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 136**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 27<sup>th</sup> day of July, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 137**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 31<sup>st</sup> day of July, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 138**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, TYKWON BURKS, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 31<sup>st</sup> day of July, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 139**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DAMION JACKSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 5<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 140**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DAMION JACKSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 5<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 141**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, and JOHN BOUGHTON, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 5<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 142**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, and JOHN BOUGHTON, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 5<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 143**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DAMION JACKSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED

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

Said defendant, on or about the 19<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 144**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, and DWAIN TATE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 19<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 145**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, and JOHN BOUGHTON, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 19<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 146**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, JOHN BOUGHTON, and DWAIN TATE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 19<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 147**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, DAMION JACKSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 25<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Heroin.

**COUNT 148**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, and DWAIN TATE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 25<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 149**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, and JOHN BOUGHTON, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 25<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Heroin, with the intent to sell it.

**COUNT 150**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendants, DAMION JACKSON, JOHN BOUGHTON, and DWAIN TATE, each aiding and acting in concert with each other, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 25<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 151**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ONEIL MITCHELL, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 12<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 152**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ONEIL MITCHELL, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 12<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 153**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ONEIL MITCHELL, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 154**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ONEIL MITCHELL, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 155**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ONEIL MITCHELL, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 156**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ONEIL MITCHELL, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:



Said defendant, on or about the 6<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 157**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ONEIL MITCHELL, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 21<sup>st</sup> day of October, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 158**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ONEIL MITCHELL, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 21<sup>st</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 159**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ANDREW HUTCHINSON, of committing the crime of CRIMINAL SALE OF A

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

Said defendant, on or about the 26<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 160**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ANDREW HUTCHINSON, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 26<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 161**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ANDREW HUTCHINSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 26<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 162**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ANDREW HUTCHINSON, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 26<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 163**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ANDREW HUTCHINSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 29<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 164**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ANDREW HUTCHINSON, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 29<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 165**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ANDREW HUTCHINSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 30<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 166**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ANDREW HUTCHINSON, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 30<sup>th</sup> day of September, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 167**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ADRIAN HUTCHINSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 10<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 168**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ADRIAN HUTCHINSON, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 10<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 169**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ADRIAN HUTCHINSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 19<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 170**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ADRIAN HUTCHINSON, of committing the crime of CRIMINAL POSSESSION OF A

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

Said defendant, on or about the 19<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

**COUNT 171**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ADRIAN HUTCHINSON, of committing the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.39(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 29<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully sell a narcotic drug, to wit, Cocaine.

**COUNT 172**

THE GRAND JURY OF ORANGE COUNTY, by this indictment, accuses the defendant, ADRIAN HUTCHINSON, of committing the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE in violation of §220.16(1) of the Penal Law of the State of New York, committed as follows:

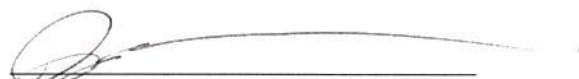
Said defendant, on or about the 29<sup>th</sup> day of October, 2017, in Orange County, did knowingly and unlawfully possess a narcotic drug, to wit, Cocaine, with the intent to sell it.

Dated: February 8, 2018  
Goshen, New York

PERI ALYSE KADANOFF  
Deputy Attorney General  
Organized Crime Task Force

By   
SHANON N. LA CORTE  
Assistant Deputy Attorney General

**A TRUE BILL**

  
GRAND JURY FOREPERSON  
Dated: February 8, 2018