

STATE OF NEW YORK COUNTY COURT
COUNTY OF ST. LAWRENCE

-----X
THE PEOPLE OF THE STATE OF NEW YORK

-against-

SAIDAH ABDULKARIM
HEATHER AMAREL
CHARLES AYOTTE
ADAM BAXTER
CHASE BAXTER
MICHAEL BERRY
ANTHONY BUSHEY
KIMBERLY CLIFFORD
KATIE DAVISON
NICOLE DISHAW
PATIENCE DISSOTTLE
KAMAO DOUGLAS
TASHAWN DUTTON a/k/a TASHAWN PAYTON
CURTIS FELDER
AHIJAH FOSTER
DANDRE GATSON
MARK GREEN
SAMANTHA GRIFFIN
SHARON GUSHLAW
STACEY HALEY
JASON HENRIQUEZ
SIERRA HERBICK
JARED JOHNSTON
RIZWAN KHAN
CHRISTOPHER KOCIENSKI
TRISTA LADUE
JENNA LAMAR
CAISEY LAMOTTE
BOBBIE JO LAROCK
CHRISTOPHER LAROSE
DONNA LAROSE
MICHAEL LAURY
JOSE MARTE
MELISSA MCCARTHY
MATTHEW MCGRATH
TERRY MCGREGOR
TYLER MCGREGOR
DOUGLAS MONROE
LEAH MUSANTE

SEALED
INDICTMENT
Indict No. 2017-053A-EEE
Index No. 23491

OCTF 16-015S-2

DANIEL NYE
TRAVIS O'NEILL
ALLEN OSHIER
MARIANO PATTERSON
DALE PRYCE
JASON PURNELL
PAUL RADEL
CHRISTOPHER REED
STEPHANIE SELLERS
YASIF SIMS
CIERA SMITH
FRANCINE SOKOLOWSKI
BOBBIEJO STOWELL
SABRINA TORREZ
LYDELL WASHINGTON
CASEY JO WEST
QUAREESE WEST
SHAKA WILLIAMS

Defendants.

-----X

COUNT ONE

THE GRAND JURY OF ST. LAWRENCE COUNTY, by this indictment, accuses the defendants, SAIDAH ABDULKARIM, HEATHER AMAREL, CHARLES AYOTTE, ADAM BAXTER, CHASE BAXTER, MICHAEL BERRY, ANTHONY BUSHEY, KIMBERLY CLIFFORD, KATIE DAVISON, NICOLE DISHAW, PATIENCE DISSOTTLE, KAMAO DOUGLAS, TASHAWN DUTTON a/k/a TASHAWN PAYTON, CURTIS FELDER, AHIJAH FOSTER, DANDRE GATSON, MARK GREEN, SAMANTHA GRIFFIN, SHARON GUSHLAW, STACEY HALEY, JASON HENRIQUEZ, SIERRA HERBICK, JARED JOHNSTON, RIZWAN KAHN, CHRISTOPHER KOCIENSKI, TRISTA LADUE, JENNA LAMAR, CAISEY LAMOTTE, BOBBIE JO LAROCK, CHRISTOPHER LAROSE, DONNA LAROSE, MICHAEL LAURY, JOSE MARTE, MELISSA MCCARTHY, MATTHEW MCGRATH, TERRY MCGREGOR, TYLER MCGREGOR, DOUGLAS MONROE, LEAH

MUSANTE, DANIEL NYE, TRAVIS O'NEILL, ALLEN OSHIER, MARIANO PATTERSON, DALE PRYCE, JASON PURNELL, PAUL RADEL, CHRISTOPHER REED, STEPHANIE SELLERS, YASIF SIMS, CIERA SMITH, FRANCINE SOKOLOWSKI, BOBBIEJO STOWELL, SABRINA TORREZ, LYDELL WASHINGTON, CASEY JO WEST, QUAREESE WEST, SHAKA WILLIAMS of the crime of **CONSPIRACY IN THE SECOND DEGREE**, in violation of Section 105.15 of the Penal Law of the State of New York, committed as follows:

From on or before March 4, 2016, through on or about February 17, 2017, in St. Lawrence County, Cortland County, Chenango County, Clinton County, Bronx County, New York County, Essex County and elsewhere in the State of New York and the State of New Jersey, with intent that conduct constituting the crimes of Criminal Possession of a Controlled Substance in the First Degree, Criminal Possession of a Controlled Substance in the Second Degree, and/or Criminal Sale of a Controlled Substance in the Second Degree, said crimes being Class A felonies, be committed, the defendants knowingly and intentionally agreed with each other and with others, known and unknown, to engage in and cause the performance of such conduct.

PREAMBLE

It was part of this conspiracy to possess and sell narcotics in St. Lawrence County, New York County, Cortland County, Chenango County, and Clinton County, Bronx County, New York County, Essex County, and elsewhere in the State of New York and the State of New Jersey.

It was also part of this conspiracy for CURTIS FELDER and JASON PURNELL to sell narcotics to TRAVIS O'NEILL, MICHAEL BERRY, HEATHER AMAREL, FRANCINE SOKOLOWSKI and others.

It was also part of this conspiracy MICHAEL LAURI to provide CURTIS FELDER with narcotics for distribution to others.

It was also part of this conspiracy for DEANDRE GATSON to provide narcotics to CHRISTOPHER KOCIENSKI to re-sell to others.

It was also part of this conspiracy for SHAKA WILLIAMS to provide narcotics to CHRISTOPHER KOCIENSKI, JENNA LAMAR, CASEY JO WEST, DANIEL NYE, JASON HENRIQUEZ and TRISTA LADUE for them to distribute to others.

It was also part of this conspiracy for JOSE MARTE to provide narcotics to CIERRA SMITH, CHRISTOPHER KOCIENSKI, ANTHONY BUSHEY, STACEY HALEY, LEAH MUSANTE, KAMAO DOUGLAS, SAMANTHA GRIFFIN and others for distribution to others.

It was also part of this conspiracy for LYDELL WASHINGTON to provide narcotics to KAMAO DOUGLAS for distribution to others.

It was also part of this conspiracy for CHRISTOPHER REED and TASHAWN DUTTON a/k/a TASHAWN PAYTON to provide narcotics to PAUL RADEL, NICOLE DISHAW, and MICHAEL BERRY for distribution to others.

It was also part of this conspiracy for YASIF SIMS, QUAREESE WEST and SABRINA TORREZ to provide narcotics to MICHAEL BERRY for distribution to others.

It was also part of this conspiracy for STACEY HALEY, STEPHANIE SELLERS and SAIDAH ABDULKARIM to transport narcotics.

It was also part of this conspiracy for SIERRA HERBICK to provide a residence from which narcotics could be sold and to recruit resellers to distribute the narcotics.

It was also part of this conspiracy for TRAVIS O'NEILL to provide a residence from which narcotics could be sold.

It was also part of this conspiracy for TRAVIS O'NEILL to sell narcotics to FRANCINE SOKOLOWSKI, CHASE BAXTER, JENNA LAMAR, PAUL RADEL, BOBBIEJO STOWELL, LEAH MUSANTE and others for them to distribute to others.

It was also part of this conspiracy for KAMAO DOUGLAS to sell narcotics to JENNA LAMAR, DOUGLAS MONROE, HEATHER AMERAL, TERRY McGREGOR, ADAM BAXTER and others for them to distribute to others.

It was also part of this conspiracy for NICOLE DISHAW, ALLEN OSHIER, PATIENCE DISSOTTLE, DONNA LAROSE, DOUGLAS MONROE, SHARON GUSHLAW, CHASE BAXTER, MARIANO PATTERSON, DALE PRYCE, TERRY McGREGOR, RIZWAN KHAN, MELISSA McCARTHY, TYLER McGREGOR, KATIE DAVISON, ADAM BAXTER, JENNA LAMAR, JARED JOHNSTON, KIMBERLY CLIFFORD, CAISEY LAMOTTE, BOBBIJO LAROCK, CHARLES AYOTTE, MARK GREEN, BOBBIEJO STOWELL, FRANCINE SOKOLOWSKI, CHRISTOPHER KOCIENSKI, HEATHER AMERAL, MICHAEL BERRY, ANTHONY BUSHEY, AHIJAH FOSTER, SAMANTHA GRIFFIN, JASON HENRIQUEZ, TRISTA LADUE, CHRISTOPHER LAROSE, MATTHEW McGRATH, LEAH MUSANTE, DANIEL NYE, PAUL RADEL, CIERA SMITH, and CASEY JO WEST, to sell narcotics to others.

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

OVERT ACTS

In the furtherance of the conspiracy and to affect the objects thereof, from on or before May 18, 2016, through on or about February 11, 2017, the following overt acts, among others, were committed:

1. On May 18, 2016, NICOLE DISHAW sold heroin to a person known to the Grand Jury in the Village of Massena, in St. Lawrence County.
2. On June 9, 2016, CHRISTOPHER LAROSE sold heroin to a person known to the Grand Jury in the Village of Massena, in St. Lawrence County.
3. On June 9, 2016, PATIENCE DISSOTTLE sold heroin to a person known to the Grand Jury in the Village of Massena, in St. Lawrence County.
4. On June 14, 2016, ALLEN OSHIER sold heroin to a person known to the Grand Jury in the Village of Massena, in St. Lawrence County.
5. On June 15, 2016, CHRISTOPHER KOCIENSKI sold heroin to a person known to the Grand Jury in the Village of Massena, in St. Lawrence County.
6. On June 20, 2016, CIERA SMITH sold heroin to a person known to the Grand Jury in the Town of Stockholm, in St. Lawrence County.
7. On July 13, 2016, DOUGLAS MONROE sold heroin to a person known to the Grand Jury in the Village of Massena, in St. Lawrence County.
8. On July 13, 2016, MICHAEL BERRY sold heroin to a person known to the Grand Jury in the Town of Brasher, in St. Lawrence County.
9. On August 16, 2016, during a coded, guarded and cryptic telephone conversation, DONNA LAROSE described to CHRISTOPHER KOCIENSKI a heroin sale DONNA LAROSE had made.
10. On August 21, 2016, during a coded, guarded and cryptic telephone conversation, SHAKA WILLIAMS offered to sell both cocaine and heroin to CHRISTOPHER KOCIENSKI.

11. On August 24, 2016, during a coded, guarded and cryptic telephone conversation, DANDRE GATSON told CHRISTOPHER KOCIENSKI that DANDRE GATSON had cocaine and heroin for KOCIENSKI.

12. On August 27, 2016, during a coded, guarded and cryptic telephone conversation, CHASE BAXTER, SHARON GUSHLAW and PATIENCE DISSOTTLE discussed the possibility of PATIENCE DISSOTTLE selling cocaine for CHASE BAXTER and SHARON GUSHLAW.

13. On August 31, 2016, during a coded, guarded and cryptic telephone conversation, MARIANO PATTERSON agreed to sell heroin to JENNA LAMAR.

14. On September 1, 2016, during a coded, guarded and cryptic telephone conversation, CAISEY LAMOTTE agreed to provide JENNA LAMAR with \$60 worth of narcotics.

15. On September 2, 2016, during a coded, guarded and cryptic telephone conversation, JENNA LAMAR offered narcotics to Joshua Bonno if he would give JENNA LAMAR a ride to obtain narcotics and Joshua Bonno agreed.

16. On September 2, 2016, during a coded, guarded and cryptic telephone conversation, SAMANTHA GRIFFIN agreed to sell cocaine to PATIENCE DISSOTTLE.

17. On September 7, 2016, during a coded, guarded and cryptic telephone conversation, TYLER MCGREGOR agreed to sell cocaine to PATIENCE DISSOTTLE.

18. On September 13, 2016, during a coded, guarded and cryptic telephone conversation, DALE PRYCE ordered heroin from SAMANTHA GRIFFIN to sell to others.

19. On September 16, 2016, during a coded, guarded and cryptic telephone conversation, TRISTA LADUE ordered cocaine from SHAKA WILLIAMS to sell to another person.

20. On September 16, 2016, during a coded, guarded and cryptic telephone conversation, RIZWAN KHAN agreed to sell cocaine to JENNA LAMAR.

21. On September 20, 2016, during a coded, guarded and cryptic telephone conversation, JARED JOHNSTON agreed to sell cocaine to KAMAO DOUGLAS, and KAMAO DOUGLAS agreed to sell heroin to JARED JOHNSTON.

22. On September 22, 2016, during a coded, guarded and cryptic telephone conversation, MELISSA McCARTHY ordered heroin from TRAVIS O'NEILL to sell to another person.

23. On September 23, 2016, CHRISTOPHER KOCIENSKI and CIERA SMITH possessed one-half ounce or more of the narcotic drugs Fentanyl and cocaine in the Village of Massena, in St. Lawrence County.

24. On September 24, 2016, during a coded, guarded and cryptic telephone conversation, MARK GREEN agreed to introduce CIERA SMITH to a new narcotic source of supply.

25. On October 4, 2016, during a coded, guarded and cryptic telephone conversation, TERRY McGREGOR tried to recruit JENNA LAMAR to sell narcotics for TERRY McGREGOR.

26. On October 12, 2016, during a coded, guarded and cryptic telephone conversation, BOBBIE JO LAROCK described to CHRISTOPHER LAROSE how LAROCK needs to sell narcotics to pay off fines from traffic tickets.

27. On October 14, 2016, during a series of coded, guarded and cryptic telephone communications, KATIE DAVISON ordered cocaine from JENNA LAMAR to sell to another person.

28. On October 14, 2016, during a series of coded, guarded and cryptic telephone communications, CASEY JO WEST offered to sell narcotics for SHAKA WILLIAMS.

29. On October 15, 2016, during a coded, guarded and cryptic telephone conversation, LYDELL WASHINGTON agreed to bring narcotics to KAMAO DOUGLAS in St. Lawrence County.

30. On October 21, 2016, during a coded, guarded and cryptic telephone conversation, DANIEL NYE gave SHAKA WILLIAMS an accounting of how much narcotics DANIEL NYE had left to sell.

31. On October 22, 2016, during a coded, guarded and cryptic telephone conversation, SIERRA HERBICK agreed to allow narcotics dealers to sell narcotics at Herbick's residence.

32. On October 25, 2016, during a coded, guarded and cryptic telephone conversation, ADAM BAXTER offered to sell heroin to TRAVIS O'NEILL.

33. On October 26, 2016, during a coded, guarded and cryptic telephone conversation, CHRISTOPHER LAROSE ordered narcotics from CHARLES AYOTTE to sell to others.

34. On October 27, 2016, NICOLE DISHAW, PAUL RADEL, CHRISTOPHER REED and TASHAWN DUTTON a/k/a TASHAWN PAYTON possessed heroin and more than four ounces of cocaine and heroin in the Town of Beekmantown, in Clinton County.

35. On November 1, 2016, during a coded, guarded and cryptic telephone conversation, JASON HENRIQUEZ told SHAKA WILLIAMS that JASON HENRIQUEZ was not currently in possession of bags with which to package narcotics for distribution to others.

36. On November 7, 2016, during a coded, guarded and cryptic telephone conversation, BOBBIE JO STOWELL ordered \$500 worth of narcotics from TRAVIS O'NEILL to sell to another person.

37. On November 10, 2016, during a coded, guarded and cryptic telephone conversation, FRANCINE SOKOLOWSKI, CHRISTOPHER LAROSE and CAISEY LAMOTTE discussed narcotics they had sold.

38. On November 28, 2016, during a coded, guarded and cryptic telephone conversation, LEAH MUSANTE agreed to sell cocaine to TRAVIS O'NEILL.

39. On December 5, 2016, during a coded, guarded and cryptic telephone conversation, CURTIS FELDER directed AHIJAH FOSTER to bring bags in order to package narcotics for distribution to others.

40. On December 7, 2016, MICHAEL BERRY, YASIF SIMS, QUAREESE WEST, MATTHEW McGRATH and SABRINA TORREZ possessed Fentanyl, heroin and more than eight ounces of cocaine in the Village of Potsdam, in St. Lawrence County.

41. On December 9, 2016, SHAKA WILLIAMS possessed more than one-half ounce of heroin in the Town of Plymouth, in Chenango County.

42. On December 12, 2016, MELISSA McCARTHY and LYDELL WASHINGTON possessed Fentanyl and cocaine in the Town of North Hudson, in Essex County.

43. On December 14, 2016, JOSE MARTE, ANTHONY BUSHEY and STACEY HALEY possessed one-half ounce or more of the narcotic drug cocaine and one-eighth ounce or more of the narcotic drug heroin in New York County.

44. On December 14, 2016, during a coded, guarded and cryptic telephone conversation, CURTIS FELDER ordered narcotics from MICHAEL LAURY to sell to others.

45. On December 14, 2016, during a coded, guarded and cryptic telephone conversation with CURTIS FELDER, MICHAEL LAURY inquired whether CURTIS FELDER was prepared to procure more narcotics to sell from MICHAEL LAURY.

46. On January 26, 2017, CURTIS FELDER, SAIDAH ABDULKARIM and STEPHANIE SELLERS possessed more than eight ounces of cocaine in the Village of Massena, in St. Lawrence County.

47. On February 3, 2017, during a coded, guarded and cryptic telephone conversation, HEATHER AMAREL attempted to broker a \$500 narcotics deal between CURTIS FELDER and an unknown associate of HEATHER AMAREL.

48. On February 7, 2017, JASON PURNELL, CURTIS FELDER and TRAVIS O'NEILL possessed more than four ounces of cocaine in the Village of Massena, in St. Lawrence County.

49. On February 10, 2017, during a coded, guarded and cryptic telephone conversation, KIMBERLY CLIFFORD ordered adulterants from MICHAEL BERRY for the purpose of preparing narcotics for sale to others.

COUNT TWO

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

Said defendant, on or about the 18th day of May, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THREE

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

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

Said defendant, on or about the 18th day of May, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FOUR

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

Said defendant, on or about the 24th day of May, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT FIVE

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

Said defendant, on or about the 24th day of May, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT SIX

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

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

Said defendant, on or about the 9th day of June, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SEVEN

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

Said defendant, on or about the 9th day of June, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT EIGHT

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

Said defendant, on or about the 9th day of June, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT NINE

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

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

Said defendant, on or about the 9th day of June, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TEN

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

Said defendant, on or about the 15th day of June, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ELEVEN

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

Said defendant, on or about the 15th day of June, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWELVE

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

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

Said defendant, on or about the 16th day of June, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THIRTEEN

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

Said defendant, on or about the 16th day of June, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FOURTEEN

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

Said defendant, on or about the 20th day of June, 2016, in the Town of Stockholm, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FIFTEEN

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

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

Said defendant, on or about the 20th day of June, 2016, in the Town of Stockholm, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SIXTEEN

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

Said defendant, on or about the 8th day of July, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SEVENTEEN

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

Said defendant, on or about the 8th day of July, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT EIGHTEEN

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

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

Said defendant, on or about the 13th day of July, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT NINETEEN

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

Said defendant, on or about the 13th day of July, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWENTY

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

Said defendant, on or about the 13th day of July, 2016, in the Town of Brasher, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWENTY-ONE

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

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

Said defendant, on or about the 13th day of July, 2016, in the Town of Brasher, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWENTY-TWO

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

Said defendant, on or about the 25th day of July, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWENTY-THREE

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

Said defendant, on or about the 25th day of July, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWENTY-FOUR

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

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

Said defendant, on or about the 25th day of July, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWENTY-FIVE

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

Said defendant, on or about the 25th day of July, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWENTY-SIX

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

Said defendant, on or about the 1st day of August, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWENTY-SEVEN

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

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

Said defendant, on or about the 1st day of August, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWENTY-EIGHT

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

Said defendant, on or about the 25th day of May, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWENTY-NINE

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

Said defendant, on or about the 25th day of May, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THIRTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ALLEN OSHIER, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE**

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

Said defendant, on or about the 14th day of June, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THIRTY-ONE

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

Said defendant, on or about the 14th day of June, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THIRTY-TWO

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

Said defendant, on or about the 20th day of June, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THIRTY-THREE

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

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

Said defendant, on or about the 20th day of June, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THIRTY-FOUR

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

Said defendant, on or about the 8th day of July, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THIRTY-FIVE

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

Said defendant, on or about the 8th day of July, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THIRTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JENNA LAMAR, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN**

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

Said defendant, on or about the 4th day of September, 2016, in the Town of Norfolk, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THIRTY-SEVEN

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

Said defendant, on or about the 4th day of September, 2016, in the Town of Norfolk, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THIRTY-EIGHT

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

Said defendants, acting in concert, on or about the 23rd day of September, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT THIRTY-NINE

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

Said defendants, acting in concert, on or about the 23rd day of September, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT FORTY

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

Said defendants, acting in concert, on or about the 23rd day of September, 2016, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, fentanyl and cocaine, with intent to sell it.

COUNT FORTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, CHRISTOPHER KOCIENSKI and CIERA SMITH, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of §220.50(2) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about the 23rd day of September, 2016, in the Village of Massena, in St. Lawrence County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intended to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

COUNT FORTY-TWO

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

Said defendant, on or about the 9th day of December, 2016, in the Town of Homer, in Cortland County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

COUNT FORTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JASON HENRIQUEZ, of the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE FOURTH DEGREE** in violation of §165.45(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of December, 2016, in the Town of Homer, in Cortland County, knowingly possessed stolen property, to wit: a police tactical vest with intent to

benefit himself or a person other than an owner thereof or to impede the recovery by an owner thereof and when the value of the property exceeds one thousand dollars.

COUNT FORTY-FOUR

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

Said defendant, on or about the 9th day of December, 2016, in the Town of Plymouth, in Chenango County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FORTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, SHAKA WILLIAMS, of 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 9th day of December, 2016, in the Town of Plymouth, in Chenango County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT FORTY-SIX

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

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

Said defendant, on or about the 9th day of December, 2016, in the Town of Plymouth, in Chenango County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of individual quantities of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intended to use, the same for the purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

COUNT FORTY-SEVEN

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

Said defendant, on or about the 9th day of December, 2016, in the Town of Plymouth, in Chenango County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

COUNT FORTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, SHAKA WILLIAMS, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE FOURTH DEGREE** in violation of §265.01(4) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of December, 2016, in the Town of Plymouth, in Chenango County, knowingly possessed a shotgun, to wit: a Harrington & Richardson 12 Gauge Pump Shotgun, Serial No. NZ830449.

COUNT FORTY-NINE

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

Said defendants, acting in concert, on or about the 22nd day of September, 2016, in the Town of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, Fentanyl and cocaine, with intent to sell it.

COUNT FIFTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, KAMAO DOUGLAS, TERRY McGREGOR and SAMANTHA GRIFFIN, of 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, acting in concert, on or about the 22nd day of September, 2016, in the Town of Massena, in St. Lawrence County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, Fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT FIFTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, KAMAO DOUGLAS, TERRY McGREGOR and SAMANTHA GRIFFIN, of 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, acting in concert, on or about the 22nd day of September, 2016, in the Town of Massena, in St. Lawrence County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT FIFTY-TWO

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

Said defendant, on or about the 22nd day of September, 2016, in the Town of Massena, in St. Lawrence County, knowingly and unlawfully sold a narcotic drug, to wit, Fentanyl.

COUNT FIFTY-THREE

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

Said defendant, on or about the 22nd day of September, 2016, in the Town of Massena, in St. Lawrence County, rendered criminal assistance to a person who has committed a class B felony, to wit: TYLER McGREGOR provided KAMAO DOUGLAS with transportation as a means for KAMAO DOUGLAS to avoid discovery or apprehension by the police.

COUNT FIFTY-FOUR

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

Said defendant, on or about the 14th day of December, 2016, in the City of New York, in New York County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FIFTY-FIVE

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

Said defendant, on or about the 14th day of December, 2016, in the City of New York, in New York County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing a narcotic drug, to wit, cocaine, and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT FIFTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSE MARTE, of 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 14th day of December, 2016, in the City of New York, in New York County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

COUNT FIFTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSE MARTE, of 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 14th day of December, 2016, in the City of New York, in New York County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT FIFTY-EIGHT

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

Said defendant, on or about the 14th day of December, 2016, in the City of New York, in New York County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin and cocaine, with intent to sell it.

COUNT FIFTY-NINE

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

Said defendants, acting in concert, on or about the 14th day of December, 2016, in the City of New York, in New York County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine and heroin, with intent to sell it.

COUNT SIXTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, ANTHONY BUSHEY and STACEY HALEY, of 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 14th day of December, 2016, in the City of New York, in New York County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

COUNT SIXTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, ANTHONY BUSHEY and STACEY HALEY, of 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 14th day of December, 2016, in the City of New York, in New York County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT SIXTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, NICOLE DISHAW, PAUL RADEL, CHRISTOPHER REED and TASHAWN DUTTON a/k/a TASHAWN PAYTON, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.18(1) of the Penal Law of the State of New York committed as follows:

Said defendants, acting in concert, on or about the 27th day of October, 2016, in the Town of Beekmantown, in Clinton County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

COUNT SIXTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, NICOLE DISHAW, PAUL RADEL, CHRISTOPHER REED and TASHAWN DUTTON a/k/a TASHAWN PAYTON, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York committed as follows:

Said defendants, acting in concert, on or about the 27th day of October, 2016, in the Town of Beekmantown, in Clinton County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine and heroin, with intent to sell it.

COUNT SIXTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL BERRY, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Sections 110/220.18(1) of the Penal Law of the State of New York committed as follows:

Said defendant, on or about the 27th day of October, 2016, in the Town of Brasher, in St. Lawrence County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

COUNT SIXTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL BERRY, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Sections 110/220.16(1) of the Penal Law of the State of New York committed as follows:

Said defendant, on or about the 27th day of October, 2016, in the Town of Brasher, in St. Lawrence County, knowingly and unlawfully attempted to possess a narcotic drug, to wit, cocaine and heroin, with intent to sell it.

COUNT SIXTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, MICHAEL BERRY, YASIF SIMS, QUAREESE WEST, MATTHEW McGRATH and SABRINA TORREZ of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of Section 220.21(1) of the Penal Law of the State of New York committed as follows:

Said defendants, acting in concert, on or about the 7th day of December, 2016, in the Village of Potsdam, in St. Lawrence County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

COUNT SIXTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, MICHAEL BERRY, YASIF SIMS, QUAREESE WEST, MATTHEW McGRATH and SABRINA TORREZ, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York committed as follows:

Said defendants, acting in concert, on or about the 7th day of December, 2016, in the Village of Potsdam, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, heroin and Fentanyl, with intent to sell it.

COUNT SIXTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, CURTIS FELDER, SAIDAH ABDULKARIM and STEPHANIE SELLERS of the

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

Said defendants, acting in concert, on or about the 26th day of January, 2017, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

COUNT SIXTY-NINE

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

Said defendants, acting in concert, on or about the 26th day of January, 2017, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT SEVENTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, CURTIS FELDER, JASON PURNELL, SAIDAH ABDULKARIM and STEPHANIE SELLERS, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Sections 110/220.16(1) of the Penal Law of the State of New York committed as follows:

Said defendants, acting in concert, on or about the 26th day of January, 2017, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully attempted to possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SEVENTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JASON PURNELL, CURTIS FELDER, STEPHANIE SELLERS and TRAVIS O'NEILL, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.18(1) of the Penal Law of the State of New York committed as follows:

Said defendants, acting in concert, on or about the 7th day of February, 2017, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

COUNT SEVENTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JASON PURNELL, CURTIS FELDER, STEPHANIE SELLERS and TRAVIS O'NEILL, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York committed as follows:

Said defendants, acting in concert, on or about the 7th day of February, 2017, in the Village of Massena, in St. Lawrence County, possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT SEVENTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JASON PURNELL, CURTIS FELDER, STEPHANIE SELLERS and TRAVIS O'NEILL, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Sections 110/220.16(1) of the Penal Law of the State of New York committed as follows:

Said defendants, acting in concert, on or about the 7th day of February, 2017, in the Village of Massena, in St. Lawrence County, knowingly and unlawfully attempted to possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SEVENTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, CURTIS FELDER, JASON PURNELL and TRAVIS O'NEILL of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 7th day of February, 2017, in the Village of Massena, in St. Lawrence County, possessed a firearm, to wit: a 380 semi-automatic handgun, Serial No. CP061333.

COUNT SEVENTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, CURTIS FELDER, JASON PURNELL and TRAVIS O'NEILL of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 7th day of February, 2017, in the Village of Massena, in St. Lawrence County, possessed a firearm, to wit: a .38 Caliber Special revolver, Serial No. V114690.

COUNT SEVENTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, CURTIS FELDER, JASON PURNELL and TRAVIS O'NEILL of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 7th day of February, 2017, in the Village of Massena, in St. Lawrence County, possessed a weapon, to wit: Jolt Handyprod, Model 06-16SRD, stun gun.

COUNT SEVENTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, CURTIS FELDER, JASON PURNELL and TRAVIS O'NEILL of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about the 7th day of February, 2017, in the Village of Massena, in St. Lawrence County, possessed a weapon, to wit: a dagger.

COUNT SEVENTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JASON PURNELL and CURTIS FELDER of the ARMED FELONY 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 defendants, on or about the 7th day of February, 2017, in the Village of Massena, in St. Lawrence County, possessed a loaded firearm, to wit: a 380 semi-automatic handgun, Serial No. CP061333.

COUNT SEVENTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JASON PURNELL and CURTIS FELDER of the ARMED FELONY 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 defendants, on or about the 7th day of February, 2017, in the Village of Massena, in St. Lawrence County, possessed a loaded firearm, to wit: a .38 Caliber Special revolver, Serial No. V114690.

COUNT EIGHTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, TRAVIS O'NEILL of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE FOURTH DEGREE** in violation of §265.01(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 7th day of February, 2017, in the Village of Massena, in St. Lawrence County, possessed a firearm, to wit: a 380 semi-automatic handgun, Serial No. CP061333.

COUNT EIGHTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, TRAVIS O'NEILL of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE**

FOURTH DEGREE in violation of §265.01(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 7th day of February, 2017, in the Village of Massena, in St. Lawrence County, possessed a firearm, to wit: a .38 Caliber Special revolver, Serial No. V114690.

COUNT EIGHTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JASON PURNELL, CURTIS FELDER and TRAVIS O'NEILL, of the crime of **CRIMINALLY USING OF DRUG PARAPHERNALIA IN THE SECOND DEGREE** in violation of §220.50(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about the 7th day of February, 2017, in the Village of Massena, in St. Lawrence County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

COUNT EIGHTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, TRAVIS O'NEILL, of the crime of **CRIMINAL POSSESSION OF STOLEN PROPERTY IN THE THIRD DEGREE** in violation of §165.50 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 7th day of February, 2017, in the Village of Massena, in St. Lawrence County, knowingly possessed stolen property, to wit: 2004 Suzuki ATV, VIN #5SAAK46K247101927, with intent to benefit himself or a person other than an owner thereof or

to impede the recovery by an owner thereof and when the value of the property exceeds three thousand dollars.

COUNT EIGHTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, CURTIS FELDER and JASON PURNELL, of the crime of **OPERATING AS A MAJOR TRAFFICKER** in violation of §220.77(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, from on or about the 26th day of October, 2016, through on or about the 7th day of February, 2017, in St. Lawrence County and elsewhere in the State of New York, acted as directors of a controlled substance organization during a period of twelve months or less, during which period such controlled substance organization sold one or more controlled substances, to wit: cocaine and heroin, and the proceeds collected or due from such sale or sales have a total aggregate value of seventy-five thousand dollars or more.

COUNT EIGHTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, CURTIS FELDER and JASON PURNELL, of the crime of **OPERATING AS A MAJOR TRAFFICKER** in violation of §220.77(2) of the Penal Law of the State of New York, committed as follows:

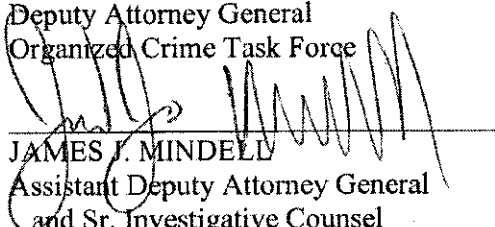
Said defendants, acting in concert, from on or about the 26th day of October, 2016, through on or about the 7th day of February, 2017, in St. Lawrence County and elsewhere in the State of New York, acting as profiteers, knowingly and unlawfully sold, on one or more occasions within six months or less, a narcotic drug, to wit: cocaine and heroin, and the proceeds collected or due from such sale or sales had a total aggregate value of seventy-five thousand dollars or more.

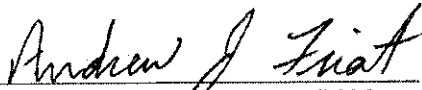
COUNT EIGHTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, CURTIS FELDER and JASON PURNELL, of the crime of **OPERATING AS A MAJOR TRAFFICKER** in violation of §220.77(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, from on or about the 26th day of October, 2016, through on or about the 7th day of February, 2017, in St. Lawrence County and elsewhere in the State of New York, acting as a profiteer, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine and heroin, with intent to sell the same, and such narcotic drugs had a total aggregate value of seventy-five thousand dollars or more.

Dated: May 25, 2017
Canton, New York

By: 
PERI ALYSE KADANOFF
Deputy Attorney General
Organized Crime Task Force
JAMES J. MINDELL
Assistant Deputy Attorney General
and Sr. Investigative Counsel
Organized Crime Task Force
615 Erie Blvd. West
Syracuse, NY 13204-2465
(315) 448-4857


GRAND JURY FOREPERSON
Dated: May 25, 2017

STATE OF NEW YORK
COUNTY OF ST. LAWRENCE

COUNTY COURT

THE PEOPLE OF THE STATE OF NEW YORK

-VS-

CURTIS FELDER,

Defendant.

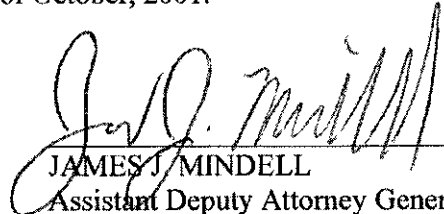
**SPECIAL
INFORMATION**

Indict No. 2017-053(N)
Index No. 2017-23491

OCTF 16-015S

Pursuant to Section 200.60(2) of the Criminal Procedure Law, it is hereby alleged that

HERETOFORE, and on or about the 16th day of July, 2004, the defendant was convicted of the crime of Manslaughter in the 2nd Degree in violation of Section 2C:11-4 of the NJSA of the State of New Jersey, in County Court, in Hudson County, State of New Jersey, said crime having been committed on or about the 18th day of October, 2001.



JAMES J. MINDELL
Assistant Deputy Attorney General
And Senior Investigative Counsel
Organized Crime Task Force
615 Erie Blvd. West
Syracuse, NY 13204-2465

STATE OF NEW YORK COUNTY COURT
COUNTY OF ST. LAWRENCE

THE PEOPLE OF THE STATE OF NEW YORK

-vs-

TRAVIS O'NEILL,

Defendant.

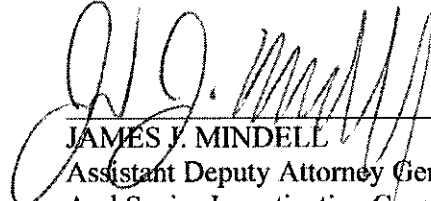
**SPECIAL
INFORMATION**

Indict No. 2017-053(OO)
Index No. 2017-23491

OCTF 16-015S

Pursuant to Section 200.60(2) of the Criminal Procedure Law, it is hereby alleged that

HERETOFORE, and on or about the 3rd day of February, 2003, the defendant was convicted of the crime of Attempted Assault in the 2nd Degree in violation of Section 110/120.05(1) of the Penal Law of the State of New York, in County Court, in St. Lawrence County, State of New York, said crime having been committed on or about the 2nd day of December, 2002.



JAMES J. MINDELL
Assistant Deputy Attorney General
And Senior Investigative Counsel
Organized Crime Task Force
615 Erie Blvd. West
Syracuse, NY 13204-2465

STATE OF NEW YORK COUNTY COURT
COUNTY OF ST. LAWRENCE

THE PEOPLE OF THE STATE OF NEW YORK

-VS-

JASON PURNELL,

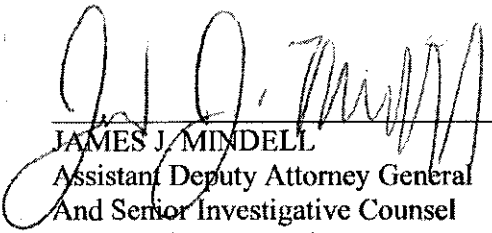
Defendant.

**SPECIAL
INFORMATION**

*Indict No. 2017-053(SS)
Index No. 2017-23491*

OCTF 16-0155

Pursuant to Section 200.60(2) of the Criminal Procedure Law, it is hereby alleged that
HERETOFORE, and on or about the 2nd day of April, 2012, the defendant was convicted
of the crime of CDS on School Property 2:C-35-7 in violation of the NJSA of the State of New
Jersey, in County Court, in Hudson County, State of New Jersey, said crime having been
committed on or about the 24th day of May, 2011.


JAMES J. MINDELL
Assistant Deputy Attorney General
And Senior Investigative Counsel
Organized Crime Task Force
615 Erie Blvd. West
Syracuse, NY 13204-2465

STATE OF NEW YORK COUNTY COURT
COUNTY OF ST. LAWRENCE

THE PEOPLE OF THE STATE OF NEW YORK

-vs-

SHAKA WILLIAMS,


Defendant.

**SPECIAL
INFORMATION**

*Indict No. 2017-053(EEE)
Index No. 2017-23491*

OCTF 16-015S

Pursuant to Section 200.60(2) of the Criminal Procedure Law, it is hereby alleged that
HERETOFORE, and on or about the 17th day of March, 2009, the defendant was
convicted of the crime of Criminal Sale of a Controlled Substance in the 3rd Degree in violation
of Section 220.39(1) of the Penal Law of the State of New York, in County Court, in Broome
County, State of New York, said crime having been committed on or about the 27th day of April,
2007.


JAMES J. MINDELL
Assistant Deputy Attorney General
And Senior Investigative Counsel
Organized Crime Task Force
615 Erie Blvd. West
Syracuse, NY 13204-2465