

STATE OF NEW YORK COUNTY COURT
COUNTY OF ONONDAGA

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THE PEOPLE OF THE STATE OF NEW YORK

-against-

SEALED
INDICTMENT
(Indict No. 2017-0382 (1-49))
Index No. 2017-452

OCTF 15-016-1

KELLY BABBITT
RASUE BARNETT, a/k/a "Sue"
BISHOP BLACK
DELAUGHN BROWN
PAUL BROWN
RASHAWN BROWN
CHRISTOPHER CALDWELL, a/k/a "Heavy"
DEVON CHRISTMAN
ARTEL CLARKE, a/k/a "Queez"
WILFORD CLARKE, a/k/a "Hoffa," a/k/a "Wolfie"
KHALIL DAVIS
KIVON DAVIS, a/k/a "Kilo"
FANIEL DENIS
SAVON ELLICK-SANDERS, a/k/a "Say Boog"
DAVID FLOYD, a/k/a "Neck"
LYNARD FUNDERBURG, a/k/a "Large"
RAYMOND HARRIS
JOSHUA HESTER, a/k/a "Hood"
JOHN HORTON
SHANTAJAH HUNTER
MATTHEW HUTCHINS
QUINCY JONES, a/k/a "Fat Boy," a/k/a "Quims," a/k/a "Boston"
MICHAEL KAIGLER
JAMES KELLEY
TERRENCE KILMER
EMERSON KINSEY
SHAKEEM KITCHEN, a/k/a "Jig"
ANTWAN LOCKHART
NIHEIM MARTIN, a/k/a "Boo Boo"
ANTWAN MCGEE
GARY MOORE
MICHAEL MORGAN, a/k/a "Mitch"
MATTHEW MULDOON
MICHAEL MYERS, a/k/a "MI"
JOSHUA POOLE
WILLIAM POOLE
REGGIE ROBINSON
YANIRA RODRIGUEZ

KENDRICK ROWSER
MIQUAN RUSSO, a/k/a “Bub”
CHARLES SCOTT
LACY SELLERS
KHARIF STRANGE
DAQUAN SULLIVAN, a/k/a “Kiss”
DEMETRIUS SULLIVAN, a/k/a “Meech”
DAVID TRAPPS, a/k/a “Dirt”
TERRI TYLER
GLEN WHITE, a/k/a “Ice”
SEAN YOUNG

Defendants.

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COUNT ONE

THE GRAND JURY OF ONONDAGA COUNTY, by this indictment, accuses the defendants, KELLY BABBITT, RASUE BARNETT, a/k/a “Sue” (hereinafter “RASUE BARNETT”), BISHOP BLACK, DELAUGHN BROWN, PAUL BROWN, RASHAWN BROWN, CHRISTOPHER CALDWELL, a/k/a “Heavy” (hereinafter “CHRISTOPHER CALDWELL”), DEVON CHRISTMAN, ARTEL CLARKE, a/k/a “Queez” (hereinafter “ARTEL CLARKE”), WILFORD CLARKE, a/k/a “Hoffa,” a/k/a “Wolfie” (hereinafter “WILFORD CLARK”), KHALIL DAVIS, KIVON DAVIS, a/k/a “Kilo” (hereinafter “KIVON DAVIS”), FANIEL DENIS, SAVON ELLICK-SANDERS, a/k/a “Say Boog” (hereinafter “SAVON ELLICK-SANDERS”), DAVID FLOYD, a/k/a “Neck” (hereinafter “DAVID FLOYD”), LYNARD FUNDERBURG, a/k/a “Large” (hereinafter “LYNARD FUNDERBURG”), RAYMOND HARRIS, JOSHUA HESTER, a/k/a “Hood” (hereinafter “JOSHUA HESTER”), JOHN HORTON, SHANTAJAH HUNTER, MATTHEW HUTCHINS, QUINCY JONES, a/k/a “Fat Boy,” a/k/a “Quims,” a/k/a “Boston” (hereinafter “QUINCY JONES”), MICHAEL KAIGLER, JAMES KELLEY, TERRENCE KILMER, EMERSON KINSEY, SHAKEEM KITCHEN, a/k/a “Jig” (hereinafter “SHAKEEM KITCHEN”), ANTWAN LOCKHART,

NIHEIM MARTIN, a/k/a “Boo Boo” (hereinafter “NIHEIM MARTIN”), ANTWAN McGEE, GARY MOORE, MICHAEL MORGAN, a/k/a “Mitch” (hereinafter “MICHAEL MORGAN”), MATTHEW MULDOON, MICHAEL MYERS, a/k/a “MI” (hereinafter “MICHAEL MYERS”), JOSHUA POOLE, WILLIAM POOLE, REGGIE ROBINSON, YANIRA RODRIGUEZ, KENDRICK ROWSER, MIQUAN RUSSO, a/k/a “Bub” (hereinafter “MIQUAN RUSSO”), CHARLES SCOTT, LACY SELLERS, KHARIF STRANGE, DAQUAN SULLIVAN, a/k/a “Kiss” (hereinafter “DAQUAN SULLIVAN”), DEMETRIUS SULLIVAN, a/k/a “Meech” (hereinafter “DEMETRIUS SULLIVAN”), DAVID TRAPPS, a/k/a “Dirt” (hereinafter “DAVID TRAPPS”), TERRI TYLER, GLEN WHITE, a/k/a “Ice” (hereinafter “GLEN WHITE”), and SEAN YOUNG 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 December 9, 2015, through on or about December 14, 2016, in Onondaga County, Oswego County, Cortland County, Madison County, St. Lawrence County and elsewhere in the State of New York, with intent that conduct constituting the crimes of Criminal Possession of a Controlled Substance in the First Degree and/or Criminal Sale of a Controlled Substance in the Second Degree, said crimes being Class A felonies, be committed, the defendants knowingly and intentionally agreed with each other and with others, known and unknown, to engage in or cause the performance of such conduct.

PREAMBLE

It was part of this conspiracy to possess narcotics in amounts of eight ounces or more and to sell narcotics in Onondaga County, Oswego County, Cortland County, Madison County, St. Lawrence County, and elsewhere in the State of New York.

It was also part of this conspiracy for QUINCY JONES to sell narcotics to KELLY BABBITT, JOSHUA POOLE, and others.

It was also part of this conspiracy for KELLY BABBITT and JOSHUA POOLE to sell narcotics to others.

It was also part of this conspiracy for DEMETRIUS SULLIVAN to sell narcotics to RASUE BARNETT, KHALIL DAVIS, KIVON DAVIS, MATTHEW MULDOON, SEAN YOUNG, and others.

It was also part of this conspiracy for RASUE BARNETT, KHALIL DAVIS, KIVON DAVIS, MATTHEW MULDOON and SEAN YOUNG to sell narcotics to others.

It was also part of this conspiracy for DELAUGHN BROWN to sell narcotics to BISHOP BLACK, EMERSON KINSEY and others.

It was also part of this conspiracy for BISHOP BLACK and EMERSON KINSEY to sell narcotics to others.

It was also part of this conspiracy for MICHAEL MORGAN to sell narcotics to PAUL BROWN, SHAKEEM KITCHEN, NIHEIM MARTIN, REGGIE ROBINSON and others.

It was also part of this conspiracy for PAUL BROWN, SHAKEEM KITCHEN, NIHEIM MARTIN and REGGIE ROBINSON to sell narcotics to others.

It was also part of this conspiracy for RASHAWN BROWN to sell narcotics to others.

It was also part of this conspiracy for CHRISTOPHER CALDWELL to sell narcotics to JOSHUA HESTER and others.

It was also part of this conspiracy for JOSHUA HESTER to sell narcotics to DEVON CHRISTMAN, JOHN HORTON, MATTHEW HUTCHINS, GARY MOORE, JOSHUA POOLE, KENDRICK ROWSER and others.

It was also part of this conspiracy for DEVON CHRISTMAN, JOHN HORTON, MATTHEW HUTCHINS, GARY MOORE, JOSHUA POOLE and KENDRICK ROWSER to sell narcotics to others.

It was also part of this conspiracy for ARTEL CLARKE and WILFORD CLARKE to sell narcotics to LYNARD FUNDERBURG, RAYMOND HARRIS, LACY SELLERS and others.

It was also part of this conspiracy for LYNDARD FUNDERBURG, RAYMOND HARRIS and LACY SELLERS to sell narcotics to others.

It was also part of this conspiracy for KHALIL DAVIS to sell narcotics to others and assist DEMETRIUS SULLIVAN in the sale of narcotics to others.

It was also part of this conspiracy for ANTWAN LOCKHART to direct WILLIAM POOLE regarding the preparation of narcotics for further distribution to FANIEL DENIS, DAVID TRAPPS and others.

It was also part of this conspiracy for YANIRA RODRIGUEZ to transport narcotics from the New York City area to Syracuse, New York, for ANTWAN LOCKHART.

It was also part of this conspiracy for FANIEL DENIS to assist ANTWAN LOCKHART and WILLIAM POOLE in their distribution of narcotics and to sell narcotics to others.

It was also part of this conspiracy for KHARIF STRANGE to sell narcotics to SAVON ELLICK-SANDERS.

It was also part of this conspiracy for SAVON ELLICK-SANDERS to assist MICHAEL MORGAN in the sale of narcotics and to sell narcotics to others.

It was also part of this conspiracy for DAVID FLOYD to assist MICHAEL MORGAN in the sale of narcotics and to sell narcotics to others.

It was also part of this conspiracy for SHANTAJAH HUNTER to assist QUINCY JONES with his narcotic sales.

It was also part of this conspiracy for MICHAEL KAIGLER to sell narcotics to WILFORD CLARKE and others.

It was also part of this conspiracy for EMERSON KINSEY to sell narcotics to JAMES KELLEY and others.

It was also part of this conspiracy for JAMES KELLEY to sell narcotics to others.

It was also part of this conspiracy for TERRENCE KILMER to procure narcotics from WILLIAM POOLE to sell to others.

It was also part of this conspiracy for ANTWAN McGEE to sell narcotics to others.

It was also part of this conspiracy for MICHAEL MYERS to sell narcotics to EMERSON KINSEY and others.

It was also part of this conspiracy for MIQUAN RUSSO to sell narcotics to DAQUAN SULLIVAN and DEMETRIUS SULLIVAN.

It was also part of this conspiracy for DAQUAN SULLIVAN to sell narcotics to others.

It was also part of this conspiracy for DAVID TRAPPS to sell narcotics to MICHAEL MORGAN and others.

It was also part of this conspiracy for CHARLES SCOTT to store narcotics for DAVID TRAPPS and to sell narcotics to others.

It was also part of this conspiracy for TERRI TYLER to sell narcotics to others.

It was also part of this conspiracy for GLEN WHITE to sell narcotics to MICHAEL MORGAN.

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 December 9, 2015, through on or about December 14, 2016, the following overt acts, among others, were committed:

1. On December 12, 2015, during coded, guarded and cryptic telephone communications, ANTWAN MCGEE agreed to sell cocaine to another individual.
2. On December 22, 2015, ANTWAN MCGEE met with another individual in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.
3. On January 13, 2016, MICHAEL MYERS and DAQUAN SULLIVAN met with another individual in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.
4. On February 18, 2016, in a series of coded, guarded and cryptic telephone communications, MICHAEL MYERS agreed to sell three grams of heroin to another individual for \$430.
5. On February 18, 2016, MICHAEL MYERS sold heroin in the Town of DeWitt, Onondaga County, New York.
6. On February 25, 2016, during coded, guarded and cryptic telephone communications, MATTHEW HUTCHINS asked JOSHUA HESTER when he would get “Mars”, referring to a particular brand of heroin, because he had “a couple of licks”, referring to customers who wanted it.

7. On February 26, 2016, in a coded, guarded and cryptic telephone conversation, MICHAEL MYERS ordered heroin from DAQUAN SULLIVAN.
8. On February 26, 2016, DAQUAN SULLIVAN met MICHAEL MYERS in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.
9. On February 27, 2016, JOSHUA HESTER met with an individual in the Village of Manlius, Onondaga County, New York, for the purpose of conducting a narcotics transaction.
10. On February 28, 2016, in a coded, guarded and cryptic telephone conversation, MICHAEL MYERS ordered cocaine from RASHAWN BROWN.
11. On February 28, 2016, MICHAEL MYERS met RASHAWN BROWN in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.
12. On January 28, 2016, during coded, guarded and cryptic telephone communications, JOSHUA HESTER agreed to sell heroin to JOHN HORTON for \$80 “a bun”, referring to ten envelopes of heroin, and \$175 a “grizzle”, referring to a gram, and HORTON told HESTER he would “do business with” him.
13. On January 30, 2016, during coded, guarded and cryptic telephone communications, JOHN HORTON ordered one and one-half grams of heroin from JOSHUA HESTER for \$250 and instructed HESTER to put the half gram into a separate bag.
14. On February 4, 2016, DEVON CHRISTMAN and JOSHUA HESTER met in the City of Syracuse, in Onondaga County, New York, for the purpose of conducting a narcotics transaction.

15. On February 6, 2016, during a series of coded, guarded and cryptic telephone communications, JOSHUA HESTER agreed to sell heroin to TERRI TYLER for \$300, and TYLER asked HESTER to separate 30 of the envelopes of heroin for her customers.

16. On February 6, 2016, TERRI TYLER and JOSHUA HESTER met in the City of Syracuse, Onondaga County, New York for the purpose of conducting a narcotics transaction.

17. On February 6, 2016, TERRI TYLER met with another individual in the City of Syracuse, Onondaga County, for the purpose of conducting a narcotics transaction.

18. On February 10, 2016, during a coded, guarded and cryptic telephone conversation, DEVON CHRISTMAN ordered heroin from JOSHUA HESTER.

19. On February 11, 2016, during coded, guarded and cryptic telephone communications, DEVON CHRISTMAN told JOSHUA HESTER that her customers were complaining about the quality of the “three buns”, or 30 envelopes, of heroin HESTER had sold her the previous day.

20. On February 12, 2016, during coded, guarded and cryptic telephone communications, CHRISTOPHER CALDWELL agreed to sell heroin to JOSHUA HESTER.

21. On February 18, 2016, during a coded, guarded and cryptic telephone conversation, CHRISTOPHER CALDWELL agreed to sell heroin to MICHAEL MYERS.

22. On February 18, 2016, during coded, guarded and cryptic telephone communications, KENDRICK ROWSER ordered “six”, referring to grams of heroin, from JOSHUA HESTER, and HESTER agreed to sell that quantity of heroin to ROWSER for \$1,080.

23. On February 18, 2016, KENDRICK ROWSER and JOSHUA HESTER met in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

24. On February 19, 2016, during a series of coded, guarded and cryptic telephone communications, ARTEL CLARKE agreed to sell cocaine to another person.

25. On February 19, 2016, ARTEL CLARKE met with another person in the Town of Preble, Cortland County, New York, for the purpose of conducting a narcotics transaction.

26. On February 22, 2016, during coded, guarded and cryptic telephone communications, KENDRICK ROWSER told JOSHUA HESTER that “people need”, referring to his customers, and “I am dry”, meaning he was out of heroin to sell them.

27. On February 26, 2016, during coded, guarded and cryptic telephone communications, JOSHUA HESTER agreed to sell cocaine to DAVID FLOYD.

28. On February 27, 2016, during a series of coded, guarded and cryptic telephone communications, JOSHUA HESTER and QUINCY JONES agreed to sell heroin and cocaine to a third party.

29. On February 28, 2016, during a series of coded, guarded and cryptic telephone communications, MATTHEW HUTCHINS ordered “55”, referring to envelopes of heroin, from JOSHUA HESTER for \$470.

30. On February 28, 2016, JOSHUA HESTER met with MATTHEW HUTCHINS in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

31. On February 28, 2016, MATTHEW HUTCHINS possessed heroin in the City of Syracuse, Onondaga County, New York.

32. On February 28, 2016, MATTHEW HUTCHINS sold heroin in the City of Syracuse, Onondaga County, New York.

33. On February 29, 2016, during a series of coded, guarded and cryptic telephone communications, JOSHUA POOLE ordered “a brick”, referring to 55 envelopes of heroin, from JOSHUA HESTER.

34. On March 14, 2016, during a series of coded, guarded and cryptic telephone communications, JOSHUA HESTER agreed to sell heroin to TERRI TYLER.

35. On March 18, 2016, EMERSON KINSEY sold one-half ounce of heroin or more to JOSHUA HESTER in the City of Syracuse, Onondaga County, New York.

36. On March 18, 2016, at 115 Kirk Avenue, in the City of Syracuse, Onondaga County, JOSHUA HESTER and DAVID FLOYD possessed more than one-half ounce of heroin.

37. On March 25, 2016, during a series of coded, guarded and cryptic telephone communications, GARY MOORE ordered “a brick and three buns” of heroin from JOSHUA HESTER for himself and “my boys”.

38. On March 26, 2016, during a series of coded, guarded and cryptic telephone communications, GARY MOORE told JOSHUA HESTER “we want one and one of those... a brick and a bun”, referring to heroin for himself and other people, and HESTER agreed to meet him.

39. On March 26, 2016, GARY MOORE and JOSHUA HESTER met in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

40. On April 5, 2016, in a coded, guarded and cryptic telephone communication, GARY MOORE told JOSHUA HESTER that customers were complaining to him about the quality of the heroin “we got yesterday” from Hester, adding “I know other people are going to give me the same feedback”.

41. On April 11, 2016, DAVID FLOYD met with ARTEL CLARKE at 622 W. Brighton Avenue, Syracuse, New York, for the purpose of conducting a narcotics transaction.

42. On April 11, 2016, in a series of coded, guarded and cryptic telephone communications, ARTEL CLARKE and WILFORD CLARKE agreed to sell heroin to LYNARD FUNDERBURG.

43. On April 13, 2016, in a series of coded, guarded and cryptic telephone communications, MICHAEL MYERS asked ARTEL CLARKE if he would sell heroin to one of MYERS' customers on Bishop Avenue in the City of Syracuse, Onondaga County, and CLARKE agreed.

44. On April 22, 2016, in a coded, guarded and cryptic telephone communication, ARTEL CLARKE ordered cocaine from RASHAWN BROWN.

45. On April 29, 2016, in a series of coded, guarded and cryptic telephone communications, WILFOLD CLARKE asked ARTEL CLARKE to sell heroin to a customer on Webster Avenue in the City of Syracuse, Onondaga County, New York, and ARTEL CLARKE agreed to do so.

46. On May 1, 2016, during a series of coded, guarded and cryptic telephone communications, QUINCY JONES agreed to sell "fire", referring to good quality heroin, to MATTHEW HUTCHINS.

47. On May 1, 2016, QUINCY JONES met with MATTHEW HUTCHINS in the Town of Cicero, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

48. On May 3, 2016, in a coded, guarded and cryptic telephone communication, WILFORD CLARKE directed ARTEL CLARKE to sell heroin to EMERSON KINSEY.

49. On May 3, 2016, during a series of coded, guarded and cryptic telephone communications, QUINCY JONES agreed to sell heroin to JOSHUA POOLE.

50. On May 3, 2016, during a series of coded, guarded and cryptic telephone communications, QUINCY JONES asked SHANTAJAH HUNTER to sell 1.5 grams of heroin to JOSHUA POOLE for \$250, and Hunter agreed to do so.

51. On May 3, 2016, SHANTAJAH HUNTER and JOSHUA POOLE met in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

52. On May 3, 2016, in Cortland County, New York, JOSHUA POOLE possessed heroin.

53. On May 5, 2016, during coded, guarded and cryptic telephone communications, JOSHUA POOLE ordered \$300 worth of heroin from QUINCY JONES and told JONES how he wanted the heroin packaged because he made “killer money off that”.

54. On May 6, 2016, during a series of coded, guarded and cryptic telephone communications, MATTHEW HUTCHINS asked QUINCY JONES for “the whole thing,” to convey his order of 50 envelopes of heroin, and asked JONES to package it for him because he didn’t “have the baggies to do it” for re-sale purposes. QUINCY JONES agreed to sell the heroin to HUTCHINS for \$350.

55. On May 6, 2016, during a series of coded, guarded and cryptic telephone communications, QUINCY JONES directed ARTEL CLARKE to sell “a housey”, referring to 50 envelopes of heroin, to MATTHEW HUTCHINS, and to give JONES \$150 of the \$350 HUTCHINS was going to pay for it.

56. On May 16, 2016, in a series of coded, guarded and cryptic telephone communications, DAQUAN SULLIVAN told WILFORD CLARKE his narcotics customers,

who he referred to as “my peoples”, were “ready”, and WILFORD CLARKE told SULLIVAN to meet him “at the crib”, referring to 622 West Brighton Avenue, Syracuse, New York.

57. On May 16, 2016, WILFORD CLARKE and ARTEL CLARKE met with DAQUAN SULLIVAN at 622 West Brighton Avenue, for the purpose of conducting a narcotics transaction.

58. On June 3, 2016, during a series of coded, guarded and cryptic telephone communications, KELLY BABBITT ordered a gram of heroin from QUINCY JONES to “flip”, or resell.

59. On June 3, 2016, during a series of coded, guarded and cryptic telephone communications, QUINCY JONES requested that SHANTAJAH HUNTER sell heroin to KELLY BABBITT and HUNTER agreed.

60. On June 3, 2016, during coded, guarded and cryptic telephone communications, KHARIF STRANGE agreed to sell “a whole one of the honey buns”, referring to heroin, to SAVON ELLICK-SANDERS.

61. On June 3, 2016, KHARIF STRANGE met with SAVON ELLICK-SANDERS in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

62. On June 5, 2016, in a coded, guarded and cryptic telephone communication, SAVON ELLICK-SANDERS ordered “a whole one” heroin from KHARIF STRANGE to resell to “peoples”.

63. On June 7, 2016, during coded, guarded and cryptic telephone communications, KELLY BABBITT told QUINCY JONES she had “sold out” of heroin and said she had

“someone”, referring to her customer, “with a hundred dollars in food stamps plus cash” with which to purchase heroin, and then also ordered “a little over 200 bucks” worth of heroin.

64. On June 8, 2016, during a coded, guarded and cryptic telephone communication, KIVON DAVIS instructed SAVON ELLICK-SANDERS on techniques for selling heroin.

65. On June 15, 2016, during coded, guarded and cryptic telephone communications, EMERSON KINSEY agreed to sell “50” envelopes of heroin to JAMES KELLEY for \$270.

66. On June 15, 2016, JAMES KELLEY met with another individual in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

67. On June 16, 2016, during coded, guarded and cryptic telephone communications, JAMES KELLEY ordered heroin from EMERSON KINSEY.

68. On June 16, 2016, EMERSON KINSEY met with JAMES KELLEY in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

69. On June 16, 2016, JAMES KELLEY possessed heroin in the City of Syracuse, Onondaga County, New York.

70. On June 18, 2016, during coded, guarded and cryptic telephone communications, QUINCY JONES agreed to sell BISHOP BLACK “a house”, or 50 envelopes of heroin, for \$190.

71. On June 20, 2016, during a series of coded, guarded and cryptic telephone communications, LYNARD FUNDERBURG and QUINCY JONES discussed packaging quantities of heroin for customers.

72. On June 21, 2016, during a coded, guarded and cryptic telephone communication, NIHEIM MARTIN ordered “a honey,” referring to ten envelopes of heroin, from SAVON ELLICK-SANDERS.

73. On July 1, 2016, during coded, guarded and cryptic telephone communications, MIQUAN RUSSO agreed to sell “that ice cream cake”, referring to cocaine, to DAQUAN SULLIVAN.

74. On July 1, 2016, during coded, guarded and cryptic telephone communications, SAVON ELLICK-SANDERS and MICHAEL MORGAN discussed possessing “eight houses”, referring to 400 packages of heroin, as well as cocaine, and selling heroin and cocaine to “peoples”, referring to their customers.

75. On July 19, 2016, during a series of coded, guarded and cryptic telephone communications, MIQUAN RUSSO agreed to sell “softington,” referring to cocaine, to DAQUAN SULLIVAN.

76. On July 19, 2016, MIQUAN RUSSO and DAQUAN SULLIVAN met in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

77. On August 1, 2016, during coded, guarded and cryptic telephone communications, RASHAWN BROWN agreed to sell cocaine to another person.

78. On August 1, 2016, RASHAWN BROWN met with another person in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

79. On August 3, 2016, during a series of coded, guarded and cryptic telephone communications, MICHAEL MORGAN agreed to sell cocaine to another person.

80. On August 3, 2016, MICHAEL MORGAN met with another person in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

81. On August 6, 2016, during a coded, guarded and cryptic telephone communication, DELAUGHN BROWN agreed to sell heroin to EMERSON KINSEY.

82. On August 6, 2016, DELAUGHN BROWN and EMERSON KINSEY met in the City of Syracuse, Onondaga County, New York.

83. On August 8, 2016, in a coded, guarded and cryptic telephone conversation, DELAUGHN BROWN and BISHOP BLACK discussed how much heroin BLACK sold for BROWN and what to cut the heroin with to increase their profit.

84. On August 8, 2016, during coded, guarded and cryptic telephone communications, MICHAEL MORGAN agreed to sell a quantity of “boy”, referring to heroin, to REGGIE ROBINSON.

85. On August 8, 2016, REGGIE ROBINSON drove to MICHAEL MORGAN’s apartment in the City of Syracuse, Onondaga County, for the purpose of conducting a narcotics transaction.

86. On August 9, 2016, during coded, guarded and cryptic telephone communications, DEMETRIUS SULLIVAN agreed to sell heroin to EMERSON KINSEY and WILFORD CLARKE.

87. On August 15, 2016, REGGIE ROBINSON possessed heroin in the City of Syracuse, Onondaga County, New York.

88. On August 21, 2016, in a coded, guarded and cryptic telephone communication, SEAN YOUNG ordered “two of the doggy and five for my man” plus a “ball”, referring to heroin and cocaine, from DEMETRIUS SULLIVAN.

89. On August 23, 2016, during coded, guarded and cryptic telephone communications, DEMETRIUS SULLIVAN agreed to sell heroin to SEAN YOUNG for further distribution in St. Lawrence County, New York.

90. On August 23, 2016, DEMETRIUS SULLIVAN, KHALIL DAVIS and SEAN YOUNG met in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

91. On August 23, 2016, during a coded, guarded and cryptic telephone conversation, DEMETRIUS SULLIVAN and KHALIL DAVIS discussed the details of selling heroin in St. Lawrence County.

92. On August 24, 2016, during coded, guarded and cryptic telephone communications, DEMETRIUS SULLIVAN and KHALIL DAVIS discussed how much heroin and cocaine had been sold in Ogdensburg, St. Lawrence County, New York.

93. On August 24, 2016, during coded, guarded and cryptic telephone communications, MICHAEL MORGAN agreed to sell cocaine to PAUL BROWN.

94. On August 24, 2016, during coded, guarded and cryptic telephone communications, PAUL BROWN told MICHAEL MORGAN that his customers were complaining about the quality of the cocaine BROWN had obtained from MORGAN earlier that day.

95. On August 25, 2016, during coded, guarded and cryptic telephone communications, RASUE BARNETT, KHALIL DAVIS and DEMETRIUS SULLIVAN discussed how much money they had made from selling narcotics in St. Lawrence County that day.

96. On August 29, 2016, during coded, guarded and cryptic telephone communications, MATTHEW MULDOON ordered cocaine from DEMETRIUS SULLIVAN for himself and another person and discussed wanting to order “a Z”, referring to an ounce of cocaine, at a future date.

97. On August 31, 2016, during coded, guarded and cryptic telephone communications, MATTHEW MULDOON ordered a “quarter ounce, seven”, referring to seven grams of cocaine, from DEMETRIUS SULLIVAN.

98. On August 31, 2016, DEMETRIUS SULLIVAN met with MATTHEW MULDOON in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

99. On August 31, 2016, MATTHEW MULDOON possessed cocaine in the Town of Geddes in Onondaga County, New York.

100. On September 1, 2016, during coded, guarded and cryptic telephone communications, LYNARD FUNDERBURG ordered heroin from WILFORD CLARKE.

101. On September 6, 2016, SEAN YOUNG and DEMETRIUS SULLIVAN met in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

102. On September 6, 2016, during coded, guarded and cryptic telephone communications, MICHAEL MORGAN ordered cocaine from DAVID TRAPPS.

103. On September 17, 2016, during coded, guarded and cryptic telephone communications, PAUL BROWN told MICHAEL MORGAN he had customers who needed “two Gs” of cocaine, and Morgan agreed to provide cocaine to Brown to distribute to his customers.

104. On September 20, 2016, during coded, guarded and cryptic telephone communications, MICHAEL MORGAN directed PAUL BROWN to meet him at the River Run Apartments in the City of Fulton, Oswego County, New York, for the purpose of conducting a narcotics transaction.

105. On September 21, 2016, MICHAEL MORGAN met with PAUL BROWN in Oswego County, New York, for the purpose of conducting a narcotics transaction.

106. On September 21, 2016, PAUL BROWN met with another person in Oswego County, New York, for the purpose of conducting a narcotics transaction.

107. On September 24, 2016, during a coded, guarded and cryptic telephone conversation, LACY SELLERS told DEMETRIUS SULLIVAN he needs him to supply him with narcotics quickly because SELLERS' "peoples", referring to his narcotics customers, were "getting ready to leave".

108. On September 28, 2016, during coded, guarded and cryptic telephone communications, DEMETRIUS SULLIVAN instructed LACY SELLERS to meet with "a fifty lick", referring to a narcotics customer, adding, "Get her like a 60 she got 50," and SELLERS agreed.

109. On October 4, 2016, during a coded, guarded and cryptic telephone communication, SHAKEEM KITCHEN ordered "a G", referring to a gram of cocaine, from MICHAEL MORGAN.

110. On October 4, 2016, during coded, guarded and cryptic telephone communications, DAVID TRAPPS instructed CHARLES SCOTT to sell cocaine to Trapps' customer.

111. On October 5, 2016, during a coded, guarded and cryptic telephone communication, CHARLES SCOTT told a customer that he had an "unlimited" supply of cocaine.

112. On October 8, 2016, during a coded, guarded and cryptic telephone communication, DEMETRIUS SULLIVAN ordered cocaine from RASHAWN BROWN.

113. On October 8, 2016, RASHAWN BROWN possessed cocaine in the City of Syracuse, Onondaga County, New York.

114. On October 13, 2016, during coded, guarded and cryptic telephone communications, MICHAEL MORGAN ordered cocaine from DAVID TRAPPS.

115. On October 13, 2016, MICHAEL MORGAN and DAVID TRAPPS met in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

116. On October 14, 2016, MICHAEL MYERS possessed 53 envelopes of heroin in the City of Syracuse, Onondaga County, New York.

117. On October 24, 2016, during coded, guarded and cryptic telephone communications, ANTWAN LOCKHART called WILLIAM POOLE from New York City to discuss obtaining and preparing “two”, referring to two kilograms of cocaine.

118. On October 25, 2016, during a series of coded, guarded and cryptic telephone communications, GLEN WHITE told MICHAEL MORGAN he was about to go see “my peoples”, referring to his customers, on the east side, and Morgan ordered “ten”, referring to a quantity of heroin, and White said he would “go grab that for you.”

119. On October 29, 2016, during a coded, guarded and cryptic telephone communications, CHARLES SCOTT asked DAVID TRAPPS if he “moved the bench”, referring to a scale.

120. On October 31, 2016, DAVID TRAPPS and CHARLES SCOTT possessed more than one-half ounce of cocaine in the City of Syracuse, Onondaga County, New York.

121. On October 31, 2016, during coded, guarded and cryptic telephone communications, DAVID TRAPPS told FANIEL DENIS to tell ANTWAN LOCKHART “it’s bad” and to call him.

122. On November 2, 2016, during a series of coded, guarded and cryptic telephone communications, MICHAEL MORGAN ordered heroin from GLEN WHITE.

123. On November 2, 2016, MICHAEL MORGAN and GLEN WHITE met in the City of Syracuse, Onondaga County, New York.

124. On November 2, 2016, during coded, guarded and cryptic telephone communications, MICHAEL MORGAN informed other individuals that he was in possession of “fire h”, referring to high quality heroin.

125. On November 3, 2016, during a series of coded, guarded and cryptic telephone communications, NIHEIM MARTIN ordered heroin and cocaine from MICHAEL MORGAN.

126. On November 3, 2016, MICHAEL MORGAN met with NIHEIM MARTIN in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

127. On November 17, 2016, during a coded, guarded and cryptic telephone communication, MICHAEL MORGAN agreed to distribute “hard ball”, referring to cocaine, to SHAKEEM KITCHEN.

128. On November 17, 2016, MICHAEL MORGAN and SHAKEEM KITCHEN met in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

129. On November 19, 2016, during coded, guarded and cryptic telephone communications, FANIEL DENIS agreed to sell cocaine.

130. On November 19, 2016, FANIEL DENIS met with another person in the City of Oneida, Madison County, New York, for the purpose of conducting a narcotics transaction.

131. On November 20, 2016, during coded, guarded and cryptic telephone communications, WILLIAM POOLE agreed to sell TERRENCE KILMER “one solid piece” of cocaine for \$600.

132. On November 20, 2016, WILLIAM POOLE met with TERRENCE KILMER in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

133. On November 20, 2016, TERRENCE KILMER possessed over four grams of cocaine.

134. On November 20, 2016, during coded, guarded and cryptic telephone communications, WILLIAM POOLE agreed to sell cocaine to FANIEL DENIS.

135. On November 20, 2016, WILLIAM POOLE and FANIEL DENIS met in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

136. On November 23, 2016, MICHAEL MORGAN possessed more than one half-ounce of cocaine in the City of Syracuse, Onondaga County, New York.

137. On December 5, 2016, WILLIAM POOLE and ANTWAN LOCKHART met in the City of Syracuse, Onondaga County, New York, for the purpose of conducting a narcotics transaction.

138. On December 5, 2016, ANTWAN LOCKHART, WILLIAM POOLE and YANIRA RODRIGUEZ possessed over a kilogram of cocaine in the City of Syracuse, Onondaga County, New York.

139. On December 14, 2016, CHRISTOPHER CALDWELL met with another individual in the City of Syracuse, Onondaga County, for the purpose of conducting a narcotics transaction.

COUNT TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 7th day of January, 2016, in the City of Syracuse, in Onondaga 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, JOSHUA HESTER, 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 7th day of January, 2016, in the City of Syracuse, in Onondaga 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, JOSHUA HESTER, 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 February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 27th day of February, 2016, in the Village of Manlius, in Onondaga 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, JOSHUA HESTER, 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 27th day of February, 2016, in the Village of Manlius, in Onondaga 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, JOSHUA HESTER, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.39(1) of the Penal Law of the State of New York committed as follows:

Said defendant, on or about the 28th day of January, 2016, in the City of Syracuse, in Onondaga 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, JOSHUA HESTER, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York committed as follows:

Said defendant, on or about the 28th day of January, 2016, in the City of Syracuse, in Onondaga 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, JOHN HORTON, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York committed as follows:

Said defendant, on or about the 28th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ELEVEN

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

Said defendant, on or about the 30th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWELVE

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

Said defendant, on or about the 30th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THIRTEEN

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

Said defendant, on or about the 30th day of January, 2016, in the City of Syracuse, in Onondaga 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, JOSHUA HESTER, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.39(1) of the Penal Law of the State of New York committed as follows:

Said defendant, on or about the 31st day of January, 2016, in the Town of Salina, in Onondaga 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, JOSHUA HESTER, 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 31st day of January, 2016, in the Town of Salina, in Onondaga 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, JOSHUA HESTER, 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 February, 2016, in the City of Syracuse, in Onondaga 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, JOSHUA HESTER, 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 4th day of February, 2016, in the City of Syracuse, in Onondaga 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, JOSHUA HESTER, 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 February, 2016, in the City of Syracuse, in Onondaga 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, JOSHUA HESTER, 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 February, 2016, in the City of Syracuse, in Onondaga 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, JOSHUA HESTER, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.39(1) of the Penal Law of the State of New York committed as follows:

Said defendant, on or about the 10th day of February, 2016, in the City of Syracuse, in Onondaga 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, JOSHUA HESTER, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York committed as follows:

Said defendant, on or about the 10th day of February, 2016, in the City of Syracuse, in Onondaga 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, DEVON CHRISTMAN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York committed as follows:

Said defendant, on or about the 10th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWENTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 11th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWENTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 11th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWENTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CHRISTOPHER CALDWELL, 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 12th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWENTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CHRISTOPHER CALDWELL, 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 12th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWENTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CHRISTOPHER CALDWELL, 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 December, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWENTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CHRISTOPHER CALDWELL, 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 December, 2016, in the City of Syracuse, in Onondaga 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, CHRISTOPHER CALDWELL, 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 Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin and cocaine, with intent to sell it.

COUNT THIRTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 26th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THIRTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 26th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THIRTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAVID FLOYD, 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 26th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THIRTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THIRTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THIRTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, KENDRICK ROWSER, 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 February, 2016, in the City of Syracuse, in Onondaga 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, JOSHUA HESTER, 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 February, 2016, in the City of Syracuse, in Onondaga 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, JOSHUA HESTER, 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 February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THIRTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, KENDRICK ROWSER, 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 February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THIRTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 February, 2016, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FORTY

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

Said defendant, on or about the 22nd day of February, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FORTY-ONE

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

Said defendant, on or about the 22nd day of February, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FORTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FORTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FORTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MATTHEW HUTCHINS, 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 February, 2016, in the City of Syracuse, in Onondaga 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, JOSHUA HESTER, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.39(1) of the Penal Law of the State of New York committed as follows:

Said defendant, on or about the 28th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FORTY-SIX

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

Said defendant, on or about the 28th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FORTY-SEVEN

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

Said defendant, on or about the 28th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FORTY-EIGHT

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

Said defendant, on or about the 28th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FORTY-NINE

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

Said defendant, on or about the 28th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FIFTY

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

Said defendants, acting in concert, on or about the 6th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FIFTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, QUINCY JONES and ARTEL CLARKE, 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 6th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FIFTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MATTHEW HUTCHINS, 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 6th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FIFTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 29th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FIFTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 29th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FIFTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA POOLE, 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 29th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FIFTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 6th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FIFTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 6th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT FIFTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, TERRI TYLER, 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 6th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT FIFTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, TERRI TYLER, 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 6th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SIXTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SIXTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SIXTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, TERRI TYLER, 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 March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SIXTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 26th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SIXTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 26th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SIXTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 26th day of March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SIXTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 26th day of March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SIXTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, GARY MOORE, 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 26th day of March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SIXTY-EIGHT

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

Said defendant, on or about the 31st day of March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SIXTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 31st day of March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SEVENTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, GARY MOORE, 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 31st day of March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SEVENTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMERSON KINSEY, 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 March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SEVENTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMERSON KINSEY, 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 March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SEVENTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT SEVENTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA HESTER, 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 March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SEVENTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMERSON KINSEY, 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 18th day of March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing a narcotic drug, to wit, heroin, and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT SEVENTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMERSON KINSEY, 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 March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SEVENTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMERSON KINSEY, 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 18th day of March, 2016, in the City of Syracuse, in Onondaga 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 SEVENTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JOSHUA HESTER and DAVID FLOYD, 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 18th day of March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT SEVENTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JOSHUA HESTER and DAVID FLOYD, 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 18th day of March, 2016, in the City of Syracuse, in Onondaga 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 EIGHTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JOSHUA HESTER and DAVID FLOYD 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, acting in concert, on or about the 18th day of March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a loaded firearm, to wit: a loaded Lorcin 9mm semiautomatic pistol.

COUNT EIGHTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JOSHUA HESTER and DAVID FLOYD, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of §265.02(3) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about the 18th day of March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a firearm which was defaced for the purpose of concealment or prevention of the detection of a crime or misrepresenting the identity of such firearm, to wit: a Lorcin 9mm semiautomatic pistol with an obliterated serial number.

COUNT EIGHTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMERSON KINSEY, 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 June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT EIGHTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMERSON KINSEY, 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 June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT EIGHTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMERSON KINSEY, 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 11th day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT EIGHTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMERSON KINSEY, 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 11th day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT EIGHTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMERSON KINSEY, 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 11th day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin and cocaine, with intent to sell it.

COUNT EIGHTY-SEVEN

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

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

Said defendant, on or about the 28th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT EIGHTY-EIGHT

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

Said defendant, on or about the 28th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT EIGHTY-NINE

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

Said defendant, on or about the 28th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT NINETY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMERSON KINSEY, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT NINETY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMERSON KINSEY, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT NINETY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAMES KELLEY, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT NINETY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAMES KELLEY, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT NINETY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMERSON KINSEY, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT NINETY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMERSON KINSEY, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT NINETY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAMES KELLEY, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT NINETY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant JAMES KELLEY of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SEVENTH DEGREE** in violation of Section 220.03 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 City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a controlled substance, to wit, heroin.

COUNT NINETY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DELAUGHN BROWN, 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 6th day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT NINETY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DELAUGHN BROWN, 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 6th day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DELAUGHN BROWN, 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 6th day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DELAUGHN BROWN, 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 6th day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DELAUGHN BROWN, 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 August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DELAUGHN BROWN, 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 August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DELAUGHN BROWN, 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 August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DELAUGHN BROWN, 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 August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED SIX

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

Said defendant, on or about the 10th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED SEVEN

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

Said defendant, on or about the 10th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED EIGHT

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

Said defendant, on or about the 10th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED NINE

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

Said defendant, on or about the 10th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED TEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MYERS, 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 11th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED ELEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MYERS, 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 11th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED TWELVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MYERS, 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 January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED THIRTEEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MYERS, 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 January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED FOURTEEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MYERS, 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 February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED FIFTEEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MYERS, 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 February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED SIXTEEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MYERS, 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 February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED SEVENTEEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MYERS, 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 February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED EIGHTEEN

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

Said defendant, on or about the 17th day of February, 2016, in the Town of Camillus, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED NINETEEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MYERS, 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 17th day of February, 2016, in the Town of Camillus, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED TWENTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MYERS, 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 February, 2016, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED TWENTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MYERS, 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 February, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED TWENTY-TWO

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

Said defendant, on or about the 21st day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED TWENTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MYERS, 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 21st day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED TWENTY-FOUR

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

Said defendant, on or about the 28th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT ONE HUNDRED TWENTY-FIVE

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

Said defendant, on or about the 28th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT ONE HUNDRED TWENTY-SIX

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

Said defendant, on or about the 28th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT ONE HUNDRED TWENTY-SEVEN

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

Said defendants, acting in concert, on or about the 13th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED TWENTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED TWENTY-NINE

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

Said defendants, acting in concert, on or about the 17th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED THIRTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 17th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED THIRTY-ONE

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

Said defendants, acting in concert, on or about the 13th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED THIRTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, MICHAEL MYERS and DAQUAN SULLIVAN, 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 13th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED THIRTY-THREE

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

Said defendants, acting in concert, on or about the 13th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED THIRTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, MICHAEL MYERS and DAQUAN SULLIVAN, 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 13th day of January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED THIRTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAQUAN SULLIVAN, 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 26th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED THIRTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAQUAN SULLIVAN, 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 26th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED THIRTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MYERS, 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 26th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED THIRTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED THIRTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 January, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED FORTY

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

Said defendant, on or about the 19th day of February, 2016, Cortland County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT ONE HUNDRED FORTY-ONE

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

Said defendant, on or about the 19th day of February, 2016, in Cortland County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT ONE HUNDRED FORTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 6th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED FORTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 6th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED FORTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED FORTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED FORTY-SIX

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

Said defendants, acting in concert, on or about the 29th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED FORTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, ARTEL CLARKE and WILFORD CLARKE, 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 29th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED FORTY-EIGHT

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

Said defendants, acting in concert, on or about the 29th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED FORTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, ARTEL CLARKE and WILFORD CLARKE, 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 29th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED FIFTY

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

Said defendants, acting in concert, on or about the 3rd day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED FIFTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, ARTEL CLARKE and WILFORD CLARKE, 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 3rd day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED FIFTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED FIFTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED FIFTY-FOUR

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

Said defendants, acting in concert, on or about the 16th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED FIFTY-FIVE

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

Said defendants, acting in concert, on or about the 16th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED FIFTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAQUAN SULLIVAN, 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 May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED FIFTY-SEVEN

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

Said defendant, on or about the 19th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED FIFTY-EIGHT

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

Said defendant, on or about the 19th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED FIFTY-NINE

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

Said defendant, on or about the 10th day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT ONE HUNDRED SIXTY

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

Said defendant, on or about the 10th day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT ONE HUNDRED SIXTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILFORD CLARKE, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED SIXTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILFORD CLARKE, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED SIXTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT ONE HUNDRED SIXTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT ONE HUNDRED SIXTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RAYMOND HARRIS, 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 March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT ONE HUNDRED SIXTY-SIX

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

Said defendant, on or about the 10th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED SIXTY-SEVEN

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

Said defendant, on or about the 10th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED SIXTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 11th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT ONE HUNDRED SIXTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 11th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT ONE HUNDRED SEVENTY

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

Said defendants, acting in concert, on or about the 11th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED SEVENTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, ARTEL CLARKE and WILFORD CLARKE, 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 11th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED SEVENTY-TWO

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

Said defendant, on or about the 10th day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT ONE HUNDRED SEVENTY-THREE

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

Said defendant, on or about the 10th day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT ONE HUNDRED SEVENTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILFORD CLARKE, 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 September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED SEVENTY-FIVE

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

Said defendant, on or about the 1st day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED SEVENTY-SIX

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

Said defendant, on or about the 1st day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED SEVENTY-SEVEN

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

Said defendant, on or about the 31st day of May, 2016, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED SEVENTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL KAIGLER, 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 31st day of May, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED SEVENTY-NINE

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

Said defendant, on or about the 31st day of May, 2016, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED EIGHTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILFORD CLARKE, 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 31st day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED EIGHTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL KAIGLER, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED EIGHTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL KAIGLER, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED EIGHTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILFORD CLARKE, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED EIGHTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL KAIGLER, 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 5th day of July, 2016, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED EIGHTY-FIVE

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

Said defendant, on or about the 5th day of July, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED EIGHTY-SIX

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

Said defendant, on or about the 5th day of July, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED EIGHTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL KAIGLER, 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 September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED EIGHTY-EIGHT

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

Said defendant, on or about the 1st day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED EIGHTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILFORD CLARKE, 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 1st day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully attempted to possess a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED NINETY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL KAIGLER, 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 2nd day of September, 2016, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED NINETY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL KAIGLER, 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 2nd day of September, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED NINETY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILFORD CLARKE, 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 2nd day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED NINETY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILFORD CLARKE, 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 2nd day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED NINETY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL KAIGLER, 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 12th day of October, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED NINETY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL KAIGLER, 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 12th day of October, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED NINETY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILFORD CLARKE, 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 12th day of October, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT ONE HUNDRED NINETY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILFORD CLARKE, 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 12th day of October, 2016, in the City of Syracuse, in Onondaga 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 ONE HUNDRED NINETY-EIGHT

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

Said defendants, acting in concert, on or about the 27th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT ONE HUNDRED NINETY-NINE

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

Said defendants, acting in concert, on or about the 27th day of February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, JOSHUA HESTER and QUINCY JONES, 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 February, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin and cocaine, with intent to sell it.

COUNT TWO HUNDRED ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAQUAN SULLIVAN, 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 5th day of April, 2016, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAQUAN SULLIVAN, 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 April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAQUAN SULLIVAN, 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 April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, QUINCY JONES, 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 April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED FIVE

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

Said defendant, on or about the 1st day of May, 2016, in the Town of Cicero, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, QUINCY JONES, 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 May, 2016, in the Town of Cicero, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, QUINCY JONES, 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 6th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, QUINCY JONES, 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 6th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED NINE

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

Said defendants, acting in concert, on or about the 3rd day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED TEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, QUINCY JONES and SHANTAJAH HUNTER, 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 3rd day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED ELEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA POOLE, 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 3rd day of May, 2016, in the Town of Preble, in Cortland County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED TWELVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant JOSHUA POOLE of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SEVENTH DEGREE** in violation of Section 220.03 of the Penal Law of the State of New York committed as follows:

Said defendant, on or about the 3rd day of May, 2016, in the Town of Preble, in Cortland County, knowingly and unlawfully possessed a controlled substance, to wit, heroin.

COUNT TWO HUNDRED THIRTEEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, QUINCY JONES, 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 May, 2016, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED FOURTEEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, QUINCY JONES, 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 May, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED FIFTEEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSHUA POOLE, 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 May, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED SIXTEEN

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

Said defendants, acting in concert, on or about the 10th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED SEVENTEEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, QUINCY JONES and MICHAEL MORGAN, 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 10th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED EIGHTEEN

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

Said defendant, on or about the 10th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED NINETEEN

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

Said defendants, acting in concert, on or about the 3rd day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED TWENTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, QUINCY JONES and SHANTAJAH HUNTER, 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 3rd day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED TWENTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, KELLY BABBITT, 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 3rd day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED TWENTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, QUINCY JONES, 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 June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED TWENTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, QUINCY JONES, 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 June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED TWENTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 3rd day of March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED TWENTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 3rd day of March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED TWENTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED TWENTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 March, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED TWENTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED TWENTY-NINE

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

Said defendant, on or about the 22nd day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED THIRTY

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

Said defendants, acting in concert, on or about the 6th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED THIRTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, RASHAWN BROWN and ARTEL CLARKE, 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 6th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED THIRTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 6th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED THIRTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 6th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED THIRTY-FOUR

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

Said defendant, on or about the 17th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED THIRTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 17th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED THIRTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 11th day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED THIRTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 11th day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED THIRTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 July, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED THIRTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 July, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED FORTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED FORTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED FORTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 October, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED FORTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE** in violation of §220.06(5) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 8th day of October, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed cocaine and said cocaine weighed 500 milligrams or more.

COUNT TWO HUNDRED FORTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ANTWAN McGEE, 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 December, 2015, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED FORTY-FIVE

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

Said defendant, on or about the 22nd day of December, 2015, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED FORTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 6th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED FORTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, RASHAWN BROWN, 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 6th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED FORTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 6th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED FORTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, ARTEL CLARKE, 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 6th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED FIFTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, BISHOP BLACK, 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 6th day of April, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED FIFTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAQUAN SULLIVAN, 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 June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED FIFTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DELAUGHN BROWN, 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 5th day of September, 2016, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED FIFTY-THREE

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

Said defendant, on or about the 5th day of September, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED FIFTY-FOUR

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

Said defendant, on or about and between the 5th and 8th days of September, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED FIFTY-FIVE

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

Said defendant, on or about the 23rd day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED FIFTY-SIX

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

Said defendant, on or about the 23rd day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED FIFTY-SEVEN

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

Said defendants, acting in concert, on or about the 23rd day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED FIFTY-EIGHT

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

Said defendants, acting in concert, on or about the 23rd day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED FIFTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, DEMETRIUS SULLIVAN and KHALIL DAVIS, 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 August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine and heroin, with intent to sell it.

COUNT TWO HUNDRED SIXTY

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

Said defendant, on or about the 23rd day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine and heroin, with intent to sell it.

COUNT TWO HUNDRED SIXTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, DEMETRIUS SULLIVAN, RASUE BARNETT, KHALIL DAVIS and SEAN YOUNG, 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 25th day of August, 2016, in St. Lawrence County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin and cocaine, with intent to sell it.

COUNT TWO HUNDRED SIXTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DEMETRIUS SULLIVAN, 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 6th day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED SIXTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DEMETRIUS SULLIVAN, 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 6th day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT TWO HUNDRED SIXTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DEMETRIUS SULLIVAN, 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 29th day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED SIXTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DEMETRIUS SULLIVAN, 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 29th day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED SIXTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MATTHEW MULDOON, 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 29th day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED SIXTY-SEVEN

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

Said defendant, on or about the 31st day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED SIXTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 31st day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED SIXTY-NINE

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

Said defendant, on or about the 31st day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED SEVENTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DEMETRIUS SULLIVAN, 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 31st day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED SEVENTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MATTHEW MULDOON, 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 31st day of August, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED SEVENTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MATTHEW MULDOON, 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 31st day of August, 2016, in Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

COUNT TWO HUNDRED SEVENTY-THREE

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

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

Said defendant, on or about the 19th day of July, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED SEVENTY-FOUR

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

Said defendant, on or about the 19th day of July, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED SEVENTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, DAQUAN SULLIVAN and DEMETRIUS SULLIVAN, 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 19th day of July, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED SEVENTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED SEVENTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED SEVENTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 3rd day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED SEVENTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 3rd day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED EIGHTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 3rd day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine and heroin, with intent to sell it.

COUNT TWO HUNDRED EIGHTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 5th day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED EIGHTY-TWO

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

Said defendant, on or about the 5th day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED EIGHTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, QUINCY JONES, 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 5th day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED EIGHTY-FOUR

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

Said defendant, on or about the 5th day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED EIGHTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 6th day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED EIGHTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 6th day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED EIGHTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED EIGHTY-EIGHT

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

Said defendant, on or about the 1st day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED EIGHTY-NINE

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

Said defendant, on or about the 1st day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED NINETY

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

Said defendants, acting in concert, on or about the 4th day of November, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT TWO HUNDRED NINETY-ONE

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

Said defendants, acting in concert, on or about the 4th day of November, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED NINETY-TWO

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

Said defendant, on or about the 23rd day of November, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT TWO HUNDRED NINETY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 23rd day of November, 2016, in the City of Syracuse, in Onondaga 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 TWO HUNDRED NINETY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 23rd day of November, 2016, in the City of Syracuse, in Onondaga County, possessed a shotgun, as a misdemeanor.

COUNT TWO HUNDRED NINETY-FIVE

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

Said defendant, on or about the 23rd day of November, 2016, in the City of Syracuse, in Onondaga County, knowingly possessed diluents, dilutants or adulterants, including but not limited to, any of the following: quinine hydrochloride, mannitol, mannite, lactose or dextrose, adapted for the dilution of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

COUNT TWO HUNDRED NINETY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 23rd day of November, 2016, in the City of Syracuse, in Onondaga 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 TWO HUNDRED NINETY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 23rd day of November, 2016, in the City of Syracuse, in Onondaga 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 TWO HUNDRED NINETY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT TWO HUNDRED NINETY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THREE HUNDRED

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, REGGIE ROBINSON, 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 August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THREE HUNDRED ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, REGGIE ROBINSON, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SEVENTH DEGREE** in violation of Section 220.03 of the Penal Law of the State of New York committed as follows:

Said defendant, on or about the 15th day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a controlled substance, to wit, heroin.

COUNT THREE HUNDRED TWO

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

Said defendant, on or about the 23rd day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED THREE

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

Said defendant, on or about the 23rd day of August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, PAUL BROWN, 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 August, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 2nd day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 2nd day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED NINE

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

Said defendant, on or about the 17th day of September, 2016, in Oswego County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED TEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 17th day of September, 2016, in Oswego County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED ELEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, PAUL BROWN, 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 17th day of September, 2016, in Oswego County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED TWELVE

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

Said defendant, on or about the 21st day of September, 2016, in the City of Fulton, in Oswego County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED THIRTEEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 21st day of September, 2016, in the City of Fulton, in Oswego County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED FOURTEEN

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

Said defendant, on or about the 21st day of September, 2016, in the City of Fulton, in Oswego County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED FIFTEEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, PAUL BROWN, 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 21st day of September, 2016, in the City of Fulton, in Oswego County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED SIXTEEN

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

Said defendants, acting in concert, on or about the 28th day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED SEVENTEEN

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

Said defendants, acting in concert, on or about the 1st day of July, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED EIGHTEEN

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

Said defendants, acting in concert, on or about the 1st day of July, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THREE HUNDRED NINETEEN

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

Said defendants, acting in concert, on or about the 1st day of July, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine and heroin, with intent to sell it.

COUNT THREE HUNDRED TWENTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, KHARIF STRANGE, 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 3rd day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THREE HUNDRED TWENTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, KHARIF STRANGE, 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 3rd day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THREE HUNDRED TWENTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, SAVON ELLICK-SANDERS, 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 3rd day of June, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THREE HUNDRED TWENTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 3rd day of November, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED TWENTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 3rd day of November, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THREE HUNDRED TWENTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 3rd day of November, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine and heroin, with intent to sell it.

COUNT THREE HUNDRED TWENTY-SIX

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

Said defendant, on or about the 3rd day of November, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine and heroin, with intent to sell it.

COUNT THREE HUNDRED TWENTY-SEVEN

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

Said defendant, on or about the 17th day of November, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED TWENTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 17th day of November, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED TWENTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, SHAKEEM KITCHEN, 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 17th day of November, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED THIRTY

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

Said defendant, on or about the 25th day of October, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THREE HUNDRED THIRTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, GLEN WHITE, 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 2nd day of November, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

COUNT THREE HUNDRED THIRTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, GLEN WHITE, 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 2nd day of November, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THREE HUNDRED THIRTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 2nd day of November, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, heroin, with intent to sell it.

COUNT THREE HUNDRED THIRTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAVID TRAPPS, 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 6th day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED THIRTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAVID TRAPPS, 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 6th day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED THIRTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAVID TRAPPS, 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 City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED THIRTY-SEVEN

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

Said defendant, on or about the 22nd day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED THIRTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAVID TRAPPS, 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 26th day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED THIRTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAVID TRAPPS, 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 26th day of September, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED FORTY

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

Said defendants, acting in concert, on or about the 12th day of October, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED FORTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, DAVID TRAPPS and CHARLES SCOTT, 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 12th day of October, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED FORTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAVID TRAPPS, 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 October, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED FORTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DAVID TRAPPS, 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 October, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED FORTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MICHAEL MORGAN, 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 October, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED FORTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CHARLES SCOTT, 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 October, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED FORTY-SIX

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CHARLES SCOTT, 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 October, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED FORTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, DAVID TRAPPS and CHARLES SCOTT, 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 31st day of October, 2016, in the City of Syracuse, in Onondaga 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 THREE HUNDRED FORTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, DAVID TRAPPS and CHARLES SCOTT, 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 31st day of October, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED FORTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, DAVID TRAPPS and CHARLES SCOTT, 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 defendants, acting in concert, on or about the 31st day of October, 2016, in the City of Syracuse, in Onondaga 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 THREE HUNDRED FIFTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, DAVID TRAPPS and CHARLES SCOTT, 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 31st day of October, 2016, in the City of Syracuse, in Onondaga 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 THREE HUNDRED FIFTY-ONE

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

Said defendant, on or about the 19th day of November, 2016, in Madison County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED FIFTY-TWO

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

Said defendant, on or about the 19th day of November, 2016, in Madison County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED FIFTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, ANTWAN LOCKHART, WILLIAM POOLE and YANIRA RODRIGUEZ, 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 5th day of December, 2016, in the City of Syracuse, in Onondaga 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 THREE HUNDRED FIFTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, ANTWAN LOCKHART and WILLIAM POOLE, 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 5th day of December, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED FIFTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, ANTWAN LOCKHART and WILLIAM POOLE, 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 defendants, acting in concert, on or about the 5th day of December, 2016, in the City of Syracuse, in Onondaga 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 THREE HUNDRED FIFTY-SIX

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

Said defendants, acting in concert, on or about the 5th day of December, 2016, in the City of Syracuse, in Onondaga County, knowingly possessed diluents, dilutants or adulterants, including but not limited to, any of the following: quinine hydrochloride, mannitol, mannite, lactose or dextrose, adapted for the dilution of narcotic drugs or stimulants under circumstances

evinced an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purposes of unlawfully mixing, compounding, or otherwise preparing any narcotic drug or stimulant.

COUNT THREE HUNDRED FIFTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, ANTWAN LOCKHART and WILLIAM POOLE, 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 16th day of October, 2016, through on or about the 5th day of December, 2016, in Onondaga County, in the State of New York, acting as profiteers, knowingly and unlawfully possessed, on one or more occasions, a narcotic drug, to wit: cocaine, with intent to sell the same, and such narcotic drugs had a total aggregate value of seventy-five thousand dollars or more.

COUNT THREE HUNDRED FIFTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILLIAM POOLE, 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 November, 2016, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED FIFTY-NINE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILLIAM POOLE, 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 November, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED SIXTY

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILLIAM POOLE, 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 20th day of November, 2016, in Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

COUNT THREE HUNDRED SIXTY-ONE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, TERRENCE KILMER, 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 November, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED SIXTY-TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, TERRENCE KILMER, 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 20th day of November, 2016, in Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit, cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

COUNT THREE HUNDRED SIXTY-THREE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILLIAM POOLE, 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 November, 2016, in Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit, cocaine.

COUNT THREE HUNDRED SIXTY-FOUR

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, WILLIAM POOLE, 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 November, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED SIXTY-FIVE

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, FANIEL DENIS, 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 November, 2016, in Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit, cocaine, with intent to sell it.

COUNT THREE HUNDRED SIXTY-SIX

AND THE AFORESAID GRAND JURY, by this indictment, accuses the defendants, SAVON ELLICK-SANDERS, MICHAEL MORGAN, QUINCY JONES, DELAUGHN BROWN and NIHEIM MARTIN 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 May 28, 2016, through on or about June 27, 2016, in Onondaga County and elsewhere in the State of New York, with intent that conduct constituting the crime of Murder in the Second Degree, said crime being a Class A felony, be committed, the defendants knowingly and intentionally agreed with each other and with others, known and unknown, to engage in or cause the performance of such conduct.

PREAMBLE

It was part of this conspiracy to locate rival individuals in Onondaga County, with the objective or purpose of shooting and killing them.

It was also part of this conspiracy for SAVON ELLICK-SANDERS and QUINCY JONES to discuss plans to shoot a rival of Jones.

It was also part of this conspiracy for SAVON ELLICK-SANDERS to discuss acquiring and selling firearms to use against rival individuals.

It was also part of this conspiracy for NIHEIM MARTIN and SAVON ELLICK-SANDERS to possess firearms and to use said firearms.

It was also part of this conspiracy for MICHAEL MORGAN, DELAUGHN BROWN, NIHEIM MARTIN and QUINCY JONES to provide firearms to SAVON ELLICK-SANDERS and 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

1. On May 28, 2016, during a coded, guarded and cryptic telephone conversation, QUINCY JONES told SAVON ELLICK-SANDERS “we could’ve had” him, referring to a rival of JONES, “last night”, and ELLICK-SANDERS said he was going to spend the night at JONES’ residence.

2. On May 28, 2016, during a coded, guarded and cryptic telephone communication, SAVON ELLICK-SANDERS discussed obtaining a new firearm from another individual “as long as it holds 30”, referring to the number of bullets the gun’s magazine could hold.

3. On May 30, 2016, during a coded, guarded and cryptic telephone communication, SAVON ELLICK-SANDERS admitted to QUINCY JONES that while in a vehicle on Ballantyne Road the previous night, he shot someone using “Boo Boo’s” gun.

4. On May 31, 2016, during coded, guarded and cryptic telephone communications, SAVON ELLICK-SANDERS asked MICHAEL MORGAN for his gun and said he was going to go to Croly Street “all dirtied up,” and MORGAN told ELLICK-SANDERS to call QUINCY JONES, a/k/a “Fat Boy”.

5. On May 31, 2016, during a coded, guarded and cryptic telephone communication, QUINCY JONES agreed to bring his gun to SAVON ELLICK-SANDERS.

6. On May 31, 2016, during a coded, guarded and cryptic telephone communication, SAVON ELLICK-SANDERS told DELAUGHN BROWN he needed “them bitches,” conveying that he wanted DELAUGHN BROWN’s guns, because “we about to go there six deep, we all hopping out, watch the news”, and BROWN told ELLICK-SANDERS to go in through his bedroom window.

7. On May 31, 2016, during a coded, guarded and cryptic telephone communication, MICHAEL MORGAN agreed to “go up there” to conduct surveillance of Croly Street for SAVON ELLICK-SANDERS.

8. On May 31, 2016, during a coded, guarded and cryptic telephone communication, SAVON ELLICK-SANDERS told NIHEIM MARTIN, a/k/a “Boo Boo”, that “it’s war time” and that he was cleaning Martin’s gun for him, and Martin said he was on his way.

9. On June 27, 2016, during coded, guarded and cryptic telephone communications, NIHEIM MARTIN asked SAVON ELLICK-SANDERS to bring him “food for the 10, the whole box gone”, conveying that he was out of 10mm bullets, and Savon Ellick-Sanders responded, “Ok”.

COUNT THREE HUNDRED SIXTY-SEVEN

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, SAVON ELLICK-SANDERS, 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 defendant, on or about the 29th day of May, 2016, in the City of Syracuse, in Onondaga County, knowingly and unlawfully possessed a loaded firearm, to wit: a loaded 10mm handgun.

COUNT THREE HUNDRED SIXTY-EIGHT

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, SAVON ELLICK-SANDERS, of the crime of **ASSAULT IN THE SECOND DEGREE** in violation of §120.05(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 29th day of May, 2016, in the City of Syracuse, in Onondaga County, with intent to cause physical injury to another person, caused such injury to such person or to a third person by means of a deadly weapon or a dangerous instrument, to wit: a firearm.

Dated: April 24, 2017
Syracuse, New York

PERI ALYSE KADANOFF
Deputy Attorney General
Organized Crime Task Force

By:

GEOFFREY J. CIERECK
Assistant Deputy Attorney General
and Sr. Investigative Counsel
Organized Crime Task Force
615 Erie Blvd. West
Syracuse, NY 13204-2465

GRAND JURY FOREPERSON
Dated: April 24, 2017