| STATE OF NEW YORK COUNTY OF ONONDAGA | COUNTY COURT |
|---|---------------|
| THE PEOPLE OF THE STATE OF | X NEW YORK |

-against-

SEALED INDICTMENT (Indict No. 2017-0383 (1-4) Index No. 2017-453

TONETTE BUTLER, a/k/a "Tonette Brown" KAMAR PARKE, a/k/a "Jungle" ASIAN McARTHUR, a/k/a "Ace" GLEN WHITE, a/k/a "Ice"

OCTF 15-016-1

Defendants. -----X

COUNT ONE

THE GRAND JURY OF ONONDAGA COUNTY, by this indictment, accuses the defendants, TONETTE BUTLER, a/k/a "Tonette Brown" (hereinafter "TONETTE BUTLER"), KAMAR PARKE, a/k/a "Jungle" (hereinafter "KAMAR PARKE"), ASIAN McARTHUR, a/k/a "Ace" (hereinafter "ASIAN McARTHUR") and GLEN WHITE, a/k/a "Ice" (hereinafter "GLEN WHITE") 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:

On or about November 29, 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 and 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 GLEN WHITE to ask TONETTE BUTLER and others to look for the individuals he was targeting.

It was also part of this conspiracy for TONETTE BUTLER to report to GLEN WHITE any observations of their targeted individuals and/or vehicles associated with those individuals.

It was also part of this conspiracy for KAMAR PARKE to discuss with others the vehicle and license plate associated with an individual he and GLEN WHITE were targeting.

It was also part of this conspiracy for TONETTE BUTLER to purchase and deliver ammunition for GLEN WHITE.

It was also part of this conspiracy for ASIAN MCARTHUR to drive GLEN WHITE and KAMAR PARKE to look for their targeted individuals.

It was also part of this conspiracy for KAMAR PARKE and GLEN WHITE to discuss possessing firearms and ammunition.

It was also part of this conspiracy for GLEN WHITE to possess a loaded firearm.

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 November 12, 2016, during a coded, guarded and cryptic telephone communication, KAMAR PARKE asked GLEN WHITE where the "jump-offs" were, conveying his request for firearms, and WHITE stated they were under the bed.
- 2. On November 14, 2016, in coded, guarded and cryptic telephone communications, TONETTE BUTLER reported to GLEN WHITE the results of the surveillance she had conducted for him and said that she "drove by three times" but did not see anyone.

- 3. On November 18, 2016, during a coded, guarded and cryptic telephone communication, GLEN WHITE told a female that he "needs her on call tonight" because he was "trying to rock somebody's power out" and for her to "let me know what you see, 'cause you know I'm coming."
- 4. On November 23, 2016, in a series of coded, guarded and cryptic telephone communications, KAMAR PARKE discussed with another individual the license plate and make of vehicle in which a person they referred to as "Bleek" was located, and that the other individual saw "Bleek" at Burger King on Butternut Street, in the City of Syracuse.
- 5. On November 23, 2016, during a coded, guarded and cryptic telephone communication, KAMAR PARKE relayed that information about that license plate and make of vehicle that "Bleek" was reportedly seen in to another individual who was utilizing (315) 849-8086.
- 6. On November 24, 2016, during a coded, guarded and cryptic telephone communication, GLEN WHITE told another individual he was going to purchase another "box of food," referring to ammunition, the next day, because there were only "three sandwiches left" and said he "didn't hit nothing."
- 7. On November 26, 2016, during coded, guarded and cryptic telephone communications, TONETTE BUTLER provided GLEN WHITE a description of the vehicle the person WHITE was looking for was presently in.
- 8. On November 28, 2016, during a coded, guarded and cryptic telephone conversation, a female, using the same telephone number as the one who communicated with KAMAR PARKE's telephone in Overt Act #4 on November 23, 2016, told GLEN WHITE that "Bleek" said to tell WHITE he "just missed me" and that she told "Jungle," referring to PARKE,

the car and license plate "Bleek" was in, but that he was now in a different vehicle, and WHITE responded that "Bleek" was "dead ass."

- 9. On November 29, 2016, TONETTE BUTLER purchased a box of .40 caliber ammunition at Intimidator Sports, 7000 South Salina Street, Syracuse, New York, for GLEN WHITE.
- 10. On November 29, 2016, during coded, guarded and cryptic telephone communications, GLEN WHITE instructed TONETTE BUTLER to drop off the box of ammunition to him on Lexington Avenue, in the City of Syracuse.
- 11. On November 29, 2016, TONETTE BUTLER dropped off a box of .40 caliber ammunition to 305 Lexington Avenue, which is a residence associated with KAMAR PARKE.
- 12. On November 29, 2016, during coded, guarded and cryptic telephone communications, GLEN WHITE told KAMAR PARKE he was getting "the triples", referring to guns.
- 13. On November 29, 2016, ASIAN McARTHUR, operating a black Chevrolet Suburban, drove GLEN WHITE and KAMAR PARKE from 305 Lexington Avenue to the north side of the City of Syracuse.
- 14. On November 29, 2016, ASIAN McARTHUR failed to stop when directed to by police and initiated a high speed chase for several blocks before he, GLEN WHITE and KAMAR PARKE fled from the vehicle.
- 15. On November 29, 2016, GLEN WHITE possessed a loaded .40 caliber Glock model 22 pistol while inside a black Chevrolet Suburban.

COUNT TWO

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant,

GLEN WHITE, 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 November, 2016, in the City of Syracuse, in

Onondaga County, knowingly and unlawfully possessed a loaded firearm, to wit: a loaded .40

caliber Glock model 22 pistol.

Dated: April 24, 2017

Syracuse, New York

PERI ALYSE KADANOFF

Deputy Attorney General

Organized Crime Task Force

By:

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GRAND JURY FOREPERSON

Dated: April 24, 2017

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