

STATE OF NEW YORK  
SUPREME COURT     COUNTY OF MONROE

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THE PEOPLE OF THE STATE OF NEW YORK,

-v-

SEALED INDICTMENT  
NO.

JUAN CARLOS ROMERO GOMEZ, A/K/A “PANCHO”  
OMAR HERNANDEZ, A/K/A “BUTI”  
DANIEL POLANCO, A/K/A “TITO”  
SANTIAGO WALDRON  
JULIO JONQUET CASTILLO, A/K/A “JULITO”  
DAGOBERTO MIRANDA, A/K/A “OCTAVIO”  
RAPHAEL RODRIGUEZ  
JOSE FALCON, A/K/A “ANDY”  
RAFAEL MONTOYA MORALES  
ANGEL A. COLON  
LARRY M. POLANCO-RODRIGUEZ, A/K/A LARRY M. RODRIGUEZ-POLANCO  
MIGUEL RODRIGUEZ, A/K/A “GORDO”  
ANGEL D. ABREU, A/K/A “GORDITO”  
SAMUEL MALDONADO  
JOSE ABRIL  
LUIS A. FIGUEROA RODRIGUEZ, A/K/A LUIS A. RODRIGUEZ-FIGUEROA A/K/A  
“COLORAO”

Defendants.

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**FIRST COUNT**

THE GRAND JURY OF THE COUNTY OF MONROE, by this Indictment, accuses the defendants, JUAN CARLOS ROMERO GOMEZ, A/K/A “PANCHO” (hereinafter “JUAN CARLOS ROMERO GOMEZ”), OMAR HERNANDEZ, A/K/A “BUTI” (hereinafter “OMAR HERNANDEZ”), DANIEL POLANCO, A/K/A “TITO” (hereinafter “DANIEL POLANCO”), SANTIAGO WALDRON; JULIO JONQUET CASTILLO, A/K/A “JULITO” (hereinafter “JULIO JONQUET CASTILLO”), DAGOBERTO MIRANDA, A/K/A “OCTAVIO” (hereinafter “DAGOBERTO MIRANDA”), RAPHAEL RODRIGUEZ, JOSE FALCON, A/K/A “ANDY” (hereinafter “JOSE FALCON”), RAFAEL MONTOYA MORALES, ANGEL A. COLON, LARRY M. POLANCO-RODRIGUEZ, A/K/A LARRY M. RODRIGUEZ-POLANCO, ANGEL

D. ABREU, A/K/A “GORDITO” (hereinafter “ANGEL D. ABREU”), SAMUEL MALDONADO, MIGUEL RODRIGUEZ, A/K/A “GORDO” (hereinafter “MIGUEL RODRIGUEZ”), JOSE ABRIL, AND LUIS A. FIGUEROA RODRIGUEZ, A/K/A LUIS A. RODRIGUEZ-FIGUEROA, A/K/A “COLORAO” (hereinafter “LUIS A. FIGUEROA RODRIGUEZ”), 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:

The defendants, in Monroe County, Kings County, Bronx County, and elsewhere in the State of New York, and elsewhere, from on or before November 13, 2015, until on or about March 30, 2017, with intent that conduct constituting the crimes of Criminal Possession of a Controlled Substance in the First Degree, Criminal Possession of a Controlled Substance in the Second Degree, Criminal Sale of a Controlled Substance in the First Degree and/or Criminal Sale of a Controlled Substance in the Second Degree, said crimes being a Class A Felonies, be committed, did knowingly and intentionally agree with each other and with others, known and unknown, to engage in and cause the performance of such conduct as would constitute the above-mentioned Class A felonies.

#### **PREAMBLE**

It was the purpose of this conspiracy to possess narcotics in amounts of four ounces or more and sell narcotics in amounts of one-half ounce or more in Monroe County, Bronx County, Kings County, and elsewhere in the States of New York, and elsewhere, including the State of New Jersey.

It also part of this conspiracy for JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, to sell heroin to JULIO JONQUET CASTILLO, DAGOBERTO MIRANDA, RAPHAEL RODRIGUEZ, and others.

It also part of this conspiracy for LARRY M. POLANCO-RODRIGUEZ to provide JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ with heroin to sell to others.

It also part of this conspiracy for DANIEL POLANCO to assist JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ with their possession and sale of narcotics.

It was also part of this conspiracy for JULIO JONQUET CASTILLO, DAGOBERTO MIRANDA, and RAPHAEL RODRIGUEZ, to obtain narcotics in New York City and to transport said narcotics to Monroe County for distribution to others.

It was also part of this conspiracy for SANTIAGO WALDRON and ANGEL D. ABREU to sell narcotics to RAPHAEL RODRIGUEZ and others.

It was also part of this conspiracy for JULIO JONQUET CASTILLO, to sell narcotics to AURALIO CRUZ, SAMUEL MALDONADO, MIGUEL RODRIGUEZ, and others.

It was also part of this conspiracy for DAGOBERTO MIRANDA to sell narcotics to RAFAEL MONTOYA MORALES, SAMUEL MALDONADO, and others.

It was also part of this conspiracy for and RAPHAEL RODRIGUEZ, to sell narcotics to JOSE FALCON, MIGUEL RODRIGUEZ, JOSE ABRIL, LUIS A. FIGUEROA RODRIGUEZ, and others.

It was also part of this conspiracy for AURALIO CRUZ, JOSE FALCON, RAFAEL MONTOYA MORALES, SAMUEL MALDONADO, MIGUEL RODRIGUEZ, JOSE ABRIL, LUIS A. FIGUEROA RODRIGUEZ, to obtain narcotics from JULIO JONQUET CASTILLO, DAGOBERTO MIRANDA and RAPHAEL RODRIGUEZ, to sell to others.

It was also part of this conspiracy for ANGEL A. COLON to transport heroin from New York City, to JULIO JONQUET CASTILLO, in Rochester, New York.

It was also part of this conspiracy for JOSE ABRIL to test the quality of the heroin sold to him by RAFAEL RODRIGUEZ.

It was also part of this conspiracy for the above referenced members of the conspiracy to communicate with each other and others, primarily in the Spanish language, over cellular telephones, using coded terminology and speaking in a guarded, cryptic manner.

### **OVERT ACTS**

In furtherance of the conspiracy and to affect the objects thereof, from on or about and between November 13, 2015 and March 30, 2017 the following overt acts, among others, were committed:

1. On or about January 14, 2016, during a coded, guarded and cryptic telephone conversation with RAFAEL RODRIGUEZ, JOSE FALCON indicated that his customers liked the narcotics RAFAEL RODRIGUEZ had sold to JOSE FALCON.

2. On or about February 25, 2016, during a coded, guarded and cryptic telephone conversation, JULIO JONQUET CASTILLO apprised RAFAEL RODRIGUEZ that he had obtained some good quality heroin, stating “it’s a bomb.”

3. On or about February 26, 2016, during a coded, guarded and cryptic telephone conversation with RAFAEL RODRIGUEZ, LUIS A. FIGUEROA RODRIGUEZ stated “the car that arrived is white, not the other color” to convey that the heroin he obtained from RAFAEL RODRIGUEZ was not the same as some RAFAEL RODRIGUEZ had previously sold to LUIS A. FIGUEROA RODRIGUEZ.

4. On or about April 8, 2016, JUAN CARLOS ROMERO GOMEZ and ANGEL A. COLON transported more than eight ounces of heroin to the Wegman’s parking lot in Irondequoit, New York in a Toyota Camry.

5. On or about April 8, 2016, during a coded, guarded and cryptic telephone conversation with MIGUEL RODRIGUEZ, JULIO JONQUET CASTILLO stated he would soon

have “two legs” to distribute to MIGUEL RODRIGUEZ, referring to a quantity of heroin, and then later in the conversation changed the amount to “three legs.”

6. On or about May 5, 2016, during a coded, guarded and cryptic telephone conversation, JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ discussed the amount of narcotics they possessed, and at one point JUAN CARLOS ROMERO GOMEZ asked OMAR HERNANDEZ about “the four hundred we have stored away.”

7. On or about May 13, 2016, during a coded, guarded and cryptic telephone conversation, RAFAEL RODRIGUEZ inquired about the quality of some heroin he had supplied to JOSE ABRIL, and JOSE ABRIL said it was an “an eight and a half” on a scale of one to ten.

8. On or about May 17, 2016, during a coded, guarded and cryptic telephone conversation, DAGOBERTO MIRANDA informed RAFAEL RODRIGUEZ that JOSE FALCON had just delivered a quantity of heroin to him.

9. On or about July 30, 2016, RAFAEL RODRIGUEZ transported approximately 400 grams (more than 8 ounces) of heroin in a vehicle from New York City to Rochester, New York.

10. On or about July 30, 2016, during a coded, guarded and cryptic telephone conversation, JULIO JONQUET CASTILLO told OMAR HERNANDEZ that the police had stopped RAFAEL RODRIGUEZ and seized “4 legs,” referring to a quantity of heroin, from his vehicle.

11. On or about August 28, 2016, during a coded, guarded and cryptic telephone conversation, JUAN CARLOS ROMERO GOMEZ asked OMAR HERNANDEZ if they had “at least three legs,” referring to a quantity of heroin, and then told OMAR HERNANDEZ to “prepare it right now” for distribution to “Dagoberto.”

12. On or about August 28, 2016, in a series of coded, guarded and cryptic telephone communications, JUAN CARLOS ROMERO GOMEZ directed OMAR HERNANDEZ to meet

JUAN CARLOS ROMERO GOMEZ and DAGOBERTO MIRANDA at a particular location in Kings County.

13. On or about August 30, 2016, during a series of coded, guarded and cryptic telephone conversations, LARRY M. POLANCO-RODRIGUEZ told JUAN CARLOS ROMERO GOMEZ that he was “at the corner of Palmetto with Wilson” and JUAN CARLOS ROMERO GOMEZ told LARRY M. POLANCO-RODRIGUEZ that he was sending another male to meet him.

14. On or about August 30, 2016, LARRY M. POLANCO-RODRIGUEZ delivered a quantity of heroin to OMAR HERNANDEZ in the vicinity of Palmetto Street and Wilson Avenue in Brooklyn, New York.

15. On or about September 7, 2017, during a coded, guarded and cryptic telephone conversation between OMAR HERNANDEZ and DANEIL POLANCO, an unknown male got on DANEIL POLANCO’s phone and informed OMAR HERNANDEZ that DANEIL POLANCO had delivered the money to him.

16. On or about September 13, 2016, during a coded, guarded and cryptic telephone conversation, RAFAEL MONTOYA MORALES indicated he needed to procure “three bundles” of heroin from DAGOBERTO MIRANDA to re-sell to others.

17. On or about September 22, 2016, during a coded, guarded and cryptic telephone conversation, DAGOBERTO MIRANDA agreed to deliver “three legs”, referring to a quantity of heroin, to JULIO JONQUET CASTILLO at St. Paul and Norton Streets in Rochester, New York.

18. On or about September 22, 2106, during a coded, guarded and cryptic telephone conversation, JULIO JONQUET CASTILLO agreed to sell heroin to SAMUEL MALDONADO, stating “my friend got confused and brought me three,” “[in] a couple of minutes I will get you the other two.”

19. On or about September 22, 2016, JULIO JONQUET CASTILLO and MIGUEL RODRIGUEZ met for the purpose of conducting a narcotics transaction in Rochester, New York and during their conversation, JULIO JONQUET CASTILLO said he was going to give MIGUEL RODRIGUEZ “all I have left.”

20. On or about September 23, 2016, DANIEL POLANCO retrieved a bag containing narcotics that JUAN CARLOS ROMERO GOMEZ had thrown under a parked vehicle the vicinity of Crotona Park in the Bronx.

21. On or about November 1, 2016, during a coded, guarded and cryptic telephone conversation, SAMUEL MALDONADO asked JULIO JONQUET CASTILLO to bring him “a dollar”, referring to a quantity of heroin, and JULIO JONQUET CASTILLO agreed but indicated he would need to “go back to the house first.”

22. On or about November 4, 2016, during a coded, guarded and cryptic telephone conversation, SANTIAGO WALDRON asked an unknown male if he was “taking the two eggs or just one”, in order to ascertain the particular quantity of narcotics the unknown male wanted to purchase from him.

23. On or about November 10, 2016, during a coded, guarded and cryptic telephone conversation, an unknown male complained about the quality of the heroin he procured from SANTIAGO WALDRON, stating that a customer said “it tastes like pills”, and SANTIAGO WALDRON questioned how that could be, stating, “That has people here like is the biggest thing in the world, well, I also mixed it with the other one, I don’t know if that’s why, because he said about the taste, I mixed that one that’s killing people here.”

24. On or about February 20, 2017, ANGEL D. ABREU transported approximately 100 grams of heroin and approximately 150 grams (more than four ounces) of cocaine via a bus from New York City to Rochester, New York.

25. On or about March 3, 2017, SANTIAGO WALDRON possessed approximately 300 grams (more than eight ounces) of heroin in the vehicle he was operating.

### **SECOND COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, RAFAEL RODRIGUEZ, 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, in that he, the said RAFAEL RODRIGUEZ, on or about the 14th day of January, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

### **THIRD COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, RAFAEL RODRIGUEZ, 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, in that he, the said RAFAEL RODRIGUEZ, on or about the 14th day of January, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

### **FOURTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JOSE FALCONE, 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, in that he, the said JOSE FALCONE, on or about the 14th day of January, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.



### **FIFTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, RAFAEL RODRIGUEZ and JULIO JONQUET CASTILLO, 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, in that they, the said RAFAEL RODRIGUEZ and JULIO JONQUET CASTILLO, acting in concert, on or about the 25<sup>th</sup> day of February, 2016, in Monroe 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 eight ounces or more.

### **SIXTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that he, the said JULIO JONQUET CASTILLO, on or about 26<sup>th</sup> the day of February, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit heroin, with the intent to sell it.

### **SEVENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, RAFAEL RODRIGUEZ, 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, in that he, the said RAFAEL RODRIGUEZ, on or about the 26<sup>th</sup> day of February, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

### **EIGHTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, RAFAEL RODRIGUEZ, 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, in that he, the said RAFAEL RODRIGUEZ, on or about the 26th day of February, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

### **NINTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, RAFAEL RODRIGUEZ, 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, in that he, the said RAFAEL RODRIGUEZ, on or about the 26<sup>th</sup> day of February, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

### **TENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, JUAN CARLOS ROMERO GOMEZ and ANGEL A. COLON, 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, in that they, the said JUAN CARLOS ROMERO GOMEZ and ANGEL A. COLON, acting in concert, on or about the 8<sup>th</sup> day of April, 2016, in Monroe 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 eight ounces or more.

### **ELEVENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF Monroe, by this indictment, further accuses the defendants, JUAN CARLOS ROMERO GOMEZ and ANGEL A. COLON, of the crime of **ATTEMPTED CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Sections 110 and 220.43(1) of the Penal Law of the State of New York, in that they, the said JUAN CARLOS ROMERO GOMEZ and ANGEL A. COLON, acting in concert, on or about the 8<sup>th</sup> day of April, 2016, in Monroe County, knowingly and unlawfully attempted to sell one or more preparations, compounds, mixtures or substances containing a narcotic drug; to wit: heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

### **TWELFTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, of the crime of **ATTEMPTED CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Sections 110 and 220.43(1) of the Penal Law of the State of New York, in that he, the said JULIO JONQUET CASTILLO, on or about the 8<sup>th</sup> day of April, 2016, in Monroe County, knowingly and unlawfully attempted to sell one or more preparations, compounds, mixtures or substances containing a narcotic drug; to wit: heroin, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

### **THIRTEENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, RAFAEL RODRIGUEZ, 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, in that he, the said RAPHAEL RODRIGUEZ, on or

about the 8<sup>th</sup> day of April, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **FOURTEENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, 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, in that they, the said JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, acting in concert, on or about the 5<sup>th</sup> day of May, 2016, in Kings 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 eight ounces or more.

#### **FIFTEENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, 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, in that they, the said JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, acting in concert, on or about the 5<sup>th</sup> day of May, 2016, in Kings County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **SIXTEENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JUAN CARLOS ROMERO GOMEZ, 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, in that he, the said JUAN ROMERO GOMEZ, on or about the 6<sup>th</sup> day of May, 2016, in Monroe 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 eight ounces or more.

#### **SEVENTEENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JUAN CARLOS ROMERO GOMEZ, 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, in that he, the said JUAN CARLOS ROMERO GOMEZ, on or about the 12<sup>th</sup> day of May, 2016, in Bronx 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 eight ounces or more.

#### **EIGHTEENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JUAN CARLOS ROMERO GOMEZ, 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, in that he, the said JUAN CARLOS ROMERO GOMEZ, on or about the 12<sup>th</sup> day of May, 2016, in Bronx County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **NINETEENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JUAN CARLOS ROMERO GOMEZ, of the crime of **CRIMINAL SALE**

**OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said JUAN CARLOS ROMERO GOMEZ, on or about the 12<sup>th</sup> day of May, 2016, in Bronx County, knowingly and unlawfully sold 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 two ounces or more.

**TWENTIETH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, RAFAEL 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, in that he, the said RAFAEL RODRIGUEZ on or about the 12<sup>th</sup> day of May, 2016, in Monroe 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 eight ounces or more.

**TWENTY-FIRST COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, RAFAEL RODRIGUEZ, 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, in that he, the said RAFAEL RODRIGUEZ on or about the 12<sup>th</sup> day of May, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**TWENTY-SECOND COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further

accuses the defendant, RAFAEL RODRIGUEZ, 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, in that he, the said RAFAEL RODRIGUEZ on or about the 13<sup>th</sup> day of May, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

#### **TWENTY-THIRD COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, RAFAEL RODRIGUEZ and JOSE FALCON, 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, in that they, the said RAFAEL RODRIGUEZ and JOSE FALCON, acting in concert, on or about the 17<sup>th</sup> day of May, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **TWENTY-FOURTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, RAFAEL RODRIGUEZ and JOSE FALCON, 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, in that they, the said RAFAEL RODRIGUEZ and JOSE FALCON, acting in concert, on or about the 17<sup>th</sup> day of May, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

#### **TWENTY-FIFTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, 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, in that he, the said DAGOBERTO MIRANDA, on or about the 17<sup>th</sup> day of May, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**TWENTY-SIXTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JUAN CARLOS ROMERO GOMEZ, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said JUAN CARLOS ROMERO GOMEZ, on or about the 29<sup>th</sup> day of July, 2016, in Monroe County, Kings County, and elsewhere, knowingly and unlawfully sold 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 two ounces or more.

**TWENTY-SEVENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JUAN CARLOS ROMERO GOMEZ, 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, in that he, the said JUAN CARLOS ROMERO GOMEZ, on or about the 29<sup>th</sup> day of July, 2016, in Kings County and elsewhere, 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 eight ounces or more.

**TWENTY-EIGHTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, RAFAEL 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, in that he, the said RAFAEL RODRIGUEZ, on or about the 30<sup>th</sup> day of July, 2016, in Monroe 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 eight ounces or more.

**TWENTY-NINTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, RAFAEL RODRIGUEZ, 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, in that he, the said RAFAEL RODRIGUEZ, on or about the 30<sup>th</sup> day of July, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**THIRTIETH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that he, the said JULIO JONQUET CASTILLO, on or about the 17<sup>th</sup> day of August, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**THIRTY-FIRST COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, 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, in that he, the said DAGOBERTO MIRANDA, on or about the 17<sup>th</sup> day of August, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **THIRTY-SECOND COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, 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, in that he, the said DAGOBERTO MIRANDA, on or about the 17<sup>th</sup> day of August, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

#### **THIRTY-THIRD COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that they, the said JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, acting in concert, on or about the 28<sup>th</sup> day of August, 2016, while in Kings County, knowingly and unlawfully sold 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 two ounces or more.

#### **THIRTY-FOURTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, OMAR HERNANDEZ, 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, in that he, the said OMAR HERNANDEZ, on or about the 28<sup>th</sup> day of August, 2016, while in Kings County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **THIRTY-FIFTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, OMAR HERNANDEZ, 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, in that the said OMAR HERNANDEZ, on or about the 28<sup>th</sup> day of August, 2016, in Kings 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 eight ounces or more.

#### **THIRTY-SIXTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, 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, in that the said DAGOBERTO MIRANDA, on or about the 28<sup>th</sup> day of August, 2016, in Monroe 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 eight ounces or more.

#### **THIRTY-SEVENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, 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, in that he, the said DAGOBERTO MIRANDA, on or about the 28<sup>th</sup> day of August, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**THIRTY-EIGHTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, 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, in that they, the said JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, acting in concert, on or about the 30<sup>th</sup> day of August, 2016, in Kings 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 eight ounces or more.

**THIRTY-NINTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, 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, in that he, the said JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, acting in concert, on or about the 30<sup>th</sup> day of August, 2016, in Kings County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**FORTIETH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further

accuses the defendant, LARRY M. POLANCO 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, in that he, the said LARRY M. POLANCO RODRIGUEZ, on or about the 30<sup>th</sup> day of August, 2016, in Kings 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 eight ounces or more.

#### **FORTY-FIRST COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, LARRY M. POLANCO RODRIGUEZ, 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, in that he, the said LARRY M. POLANCO RODRIGUEZ, on or about the 30<sup>th</sup> day of August, 2016, in Kings County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **FORTY-SECOND COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, LARRY M. POLANCO RODRIGUEZ, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said LARRY M. POLANCO RODRIGUEZ, on or about the 30<sup>th</sup> day of August, 2016, in Kings County, knowingly and unlawfully sold 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 two ounces or more.

#### **FORTY-THIRD COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that they, the said JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, acting in concert, on or about the 1<sup>st</sup> day of September, 2016, while in Kings County, knowingly and unlawfully sold 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 two ounces or more.

#### **FORTY-FOURTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.18(1) of the Penal Law of the State of New York, in that they, the said JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, acting in concert, on or about the 1<sup>st</sup> day of September, 2016, in Kings 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 four ounces or more.

#### **FORTY-FIFTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, 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, in that they, the said JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, acting in concert, on or about the 1<sup>st</sup> day of September, 2016, in Kings County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**FORTY-SIXTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, 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, in that he, the said DAGOBERTO MIRANDA, on or about the 1<sup>st</sup> day of September, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**FORTY-SEVENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.18(1) of the Penal Law of the State of New York, in that he, the said DAGOBERTO MIRANDA, on or about the 1<sup>st</sup> day of September, 2016, in Monroe 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 four ounces or more.

**FORTY-EIGHTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, 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, in that he, the said DAGOBERTO MIRANDA, on or about the 2<sup>nd</sup> day of September, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **FORTY-NINTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, 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, in that he, the said DAGOBERTO MIRANDA, on or about the 2<sup>nd</sup> day of September, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

#### **FIFTIETH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that he, the said JULIO JONQUET CASTILLO, on or about the 6<sup>th</sup> day of September, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **FIFTY-FIRST COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that he, the said JULIO JONQUET CASTILLO, on or about the 6<sup>th</sup> day of September, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.



### **FIFTY-SECOND COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, RAFAEL MONTOYA MORALES and DAGOBERTO MIRANDA, 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, in that they, the said RAFAEL MONTOYA MORALES and DAGOBERTO MIRANDA, acting in concert, on or about the 13<sup>th</sup> day of September, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

### **FIFTY-THIRD COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, RAFAEL MONTOYA MORALES and DAGOBERTO MIRANDA, 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, in that they, the said RAFAEL MONTOYA MORALES and DAGOBERTO MIRANDA, acting in concert, on or about 13<sup>th</sup> day of September, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

### **FIFTY-FOURTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JUAN CARLOS ROMERO GOMEZ, 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, in that he, the said JUAN CARLOS ROMERO GOMEZ, on or about the 22<sup>nd</sup> day of September, 2016, Kings County and elsewhere, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**FIFTY-FIFTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JUAN CARLOS ROMERO GOMEZ, 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, in that he, the said JUAN CARLOS ROMERO GOMEZ, on or about the 22<sup>nd</sup> day of September, 2016, Kings County and elsewhere knowingly and unlawfully sold a narcotic drug, to wit: heroin.

**FIFTY-SIXTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, 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, in that he, the said DAGOBERTO MIRANDA, on or about the 22<sup>nd</sup> day of September, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**FIFTY-SEVENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, 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, in that the said DAGOBERTO MIRANDA, on or about 22<sup>nd</sup> day of September, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

**FIFTY-EIGHTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that he, the said JULIO JONQUET CASTILLO, on or about the 22<sup>nd</sup> day of September, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

**FIFTY-NINTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that they, the said JULIO JONQUET CASTILLO, on or about the 22<sup>nd</sup> day of September, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**SIXTIETH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, 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, in that he, the said DAGOBERTO MIRANDA, on or about 22<sup>nd</sup> day of September, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit heroin.

**SIXTY-FIRST COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, DAGOBERTO MIRANDA and JULIO JONQUET CASTILLO, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that they, the said DAGOBERTO MIRANDA and JULIO JONQUET CASTILLO, acting in concert, on or about the

22<sup>nd</sup> day of September, 2016, in Monroe County, knowingly and unlawfully sold 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 two ounces or more.

#### **SIXTY-SECOND COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, DAGOBERTO MIRANDA and JULIO JONQUET CASTILLO, 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, in that they, the said DAGOBERTO MIRANDA and JULIO JONQUET CASTILLO, acting in concert, on or about the 22<sup>nd</sup> day of September, 2016, in Monroe 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 eight ounces or more.

#### **SIXTY-THIRD COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, DAGOBERTO MIRANDA and JULIO JONQUET CASTILLO, 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, in that they, the said DAGOBERTO MIRANDA and JULIO JONQUET CASTILLO, acting in concert, on or about the 22<sup>nd</sup> day of September, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **SIXTY-FOURTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further

accuses the defendant, SAMUEL MALDONADO, 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, in that he, the said SAMUEL MALDONADO, on or about the 22<sup>nd</sup> day of September, 2016, in Monroe 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 eight ounces or more.

#### **SIXTY-FIFTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, SAMUEL MALDONADO, 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, in that the said SAMUEL MALDONADO, on or about the 22<sup>nd</sup> day of September, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **SIXTY-SIXTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, 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, in that they, the said JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, acting in concert, on or about the 23<sup>rd</sup> day of September, 2016, in the area of Bronx County and elsewhere knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **SIXTY-SEVENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further

accuses the defendants, JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, 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, in that they, the said JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, acting in concert, on or about the 23<sup>rd</sup> day of September, 2016, Kings County, Bronx County and elsewhere, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

#### **SIXTY-EIGHTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DANIEL POLANCO, 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, in that he, the said DANIEL POLANCO, on or about the 23<sup>rd</sup> day of September, 2016, in Bronx County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **SIXTY-NINTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, 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, in that he, the said DAGOBERTO MIRANDA, on or about the 23<sup>rd</sup> to 24<sup>th</sup> day of September, 2016, in Monroe County and elsewhere, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **SEVENTIETH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that he, the said JULIO JONQUET CASTILLO, on or about the 8<sup>th</sup> day of October, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

**SEVENTY-FIRST COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that he, the said JULIO JONQUET CASTILLO, on or about the 8<sup>th</sup> day of October, 2016 in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**SEVENTY-SECOND COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that he, the said JULIO JONQUET CASTILLO, on or about the 8<sup>th</sup> day of October, 2016 in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**SEVENTY-THIRD COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that he, the said JULIO JONQUET CASTILLO, on or about the 8<sup>th</sup> day of October, 2016, in Monroe County, knowingly and unlawfully sold a narcotic

drug, to wit: heroin.

**SEVENTY-FOURTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, JULIO JONQUET CASTILLO and DAGOBERTO MIRANDA, 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, in that they, the said JULIO JONQUET CASTILLO and DAGOBERTO MIRANDA, acting in concert, on or about the 27<sup>th</sup> day of October, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**SEVENTY-FIFTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, JULIO JONQUET CASTILLO and DAGOBERTO MIRANDA, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, in that they, the said JULIO JONQUET CASTILLO and DAGOBERTO MIRANDA, acting in concert, on or about the 27<sup>th</sup> day of October 2016, in Monroe 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.

**SEVENTY-SIXTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, JULIO JONQUET CASTILLO and DAGOBERTO MIRANDA, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, in that



they, the said JULIO JONQUET CASTILLO and DAGOBERTO MIRANDA, acting in concert, on or about the 27<sup>th</sup> day of October, 2016, in Monroe County, knowingly and unlawfully sold 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.

#### **SEVENTY-SEVENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that he, the said JULIO JONQUET CASTILLO, on or about the 27<sup>th</sup> day October, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

#### **SEVENTY-EIGHTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that he, the said JULIO JONQUET CASTILLO, on or about the 28<sup>th</sup> day of October, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **SEVENTY-NINTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that he, the said JULIO JONQUET CASTILLO, on

or about the 28<sup>th</sup> day of October, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

#### **EIGHTIETH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that he, the said JULIO JONQUET CASTILLO, on or about the 1<sup>st</sup> day of November, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **EIGHTY-FIRST COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said JULIO JONQUET CASTILLO, on or about the 1<sup>st</sup> day of November, 2016, in Monroe County, knowingly and unlawfully sold 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 two ounces or more.

#### **EIGHTY-SECOND COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, SAMUEL MALDONADO, 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, in that he, the said SAMUEL MALDONADO, on or about the 1<sup>st</sup> day of November, 2016, in Monroe County, knowingly and

unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**EIGHTY-THIRD COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, 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, in that he, the said DAGOBERTO MIRANDA, on or about the 2<sup>nd</sup> day of November, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**EIGHTY-FOURTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, DAGOBERTO MIRANDA, 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, in that he, the said DAGOBERTO MIRANDA, on or about the 2<sup>nd</sup> day of November, 2016, in Monroe County, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

**EIGHTY-FIFTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, 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, in that he, the said JULIO JONQUET CASTILLO, on or about the 4<sup>th</sup> day of November, 2016, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**EIGHTY-SIXTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further

accuses the defendant, JULIO JONQUET CASTILLO, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, in that he, the said JULIO JONQUET CASTILLO, on or about the 4<sup>th</sup> day of November, 2016, in Monroe County, knowingly and unlawfully sold 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.

#### **EIGHTY-SEVENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, SANTIAGO WALDRON, 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, in that he, the said SANTIAGO WALDRON, on or about the 4<sup>th</sup> day of November, 2016, in Bronx County and elsewhere, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

#### **EIGHTY-EIGHTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, SANTIAGO WALDRON, 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, in that he, the said SANTIAGO WALDRON, on or about the 4<sup>th</sup> day of November, 2016, in Bronx County and elsewhere, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

#### **EIGHTY-NINTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, SANTIAGO WALDRON 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, in that he, the said SANTIAGO WALDRON, on or about and between the 9<sup>th</sup> day of November, 2016, and the 10<sup>th</sup> day of November, 2016, in Bronx County and elsewhere, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

**NINETIETH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, SANTIAGO WALDRON, 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, in that he, the said SANTIAGO WALDRON, on or about and between the 9<sup>th</sup> day of November, 2016, and the 10<sup>th</sup> day of November, 2016, in Bronx County and elsewhere, knowingly and unlawfully sold a narcotic drug, to wit: heroin.

**NINETY-FIRST COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, ANGEL D. ABREU, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.18(1) of the Penal Law of the State of New York, in that he, the said ANGEL D. ABREU, on or about the 20<sup>th</sup> day of February, 2017, in Monroe County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug; to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

**NINETY-SECOND COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, ANGEL D. ABREU, of the crime of **CRIMINAL POSSESSION OF A**

**CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, in that he, the said ANGEL D. ABREU, on or about the 20<sup>th</sup> day of February, 2017, in Monroe 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.

**NINETY-THIRD COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, ANGEL D. ABREU, 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, in that he, the said ANGEL D. ABREU, on or about the 20<sup>th</sup> day of February, 2017, in Monroe County, knowingly and unlawfully possessed narcotic drugs, to wit: heroin and cocaine, with the intent to sell it.

**NINETY-FOURTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, SANTIAGO WALDRON, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.18(1) of the Penal Law of the State of New York, in that he, the said SANTIAGO WALDRON, on or about the 24<sup>th</sup> day of February, 2017, in Monroe 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 four ounces or more.

**NINETY-FIFTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further

accuses the defendant, SANTIAGO WALDRON, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said SANTIAGO WALDRON, on or about the 24<sup>th</sup> day of February, 2017, in Monroe County, knowingly and unlawfully sold 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 two ounces or more.

#### **NINETY-SIXTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, SANTIAGO WALDRON, 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, in that he, the said SANTIAGO WALDRON, on or about the 3<sup>rd</sup> day of March, 2017, in Monroe 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 eight ounces or more.

#### **NINETY-SEVENTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, SANTIAGO WALDRON 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, in that he, the said SANTIAGO WALDRON, on or about the 3<sup>rd</sup> day of March, 2017, in Monroe County, knowingly and unlawfully possessed a narcotic drug, to wit: heroin, with the intent to sell it.

### **NINETY-EIGHTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, of the crime of **OPERATING AS A MAJOR TRAFFICKER**, in violation of Section 220.77(1) of the Penal Law of the State of New York, in that they, the said JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, from on or before January 1, 2016, through on or about January 1, 2017, in Kings County, and elsewhere in the State of New York, acted as a director of a controlled substance organization during a period of twelve months or less, during which period the controlled substance organization sold one or more controlled substances, to wit: heroin, and the proceeds collected or due from such sale or sales had a total aggregate value of seventy-five thousand dollars or more.

### **NINETY-NINTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, of the crime of **OPERATING AS A MAJOR TRAFFICKER**, in violation of Section 220.77(2) of the Penal Law of the State of New York, in that they, the said JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, acting in concert, from on or before March 1, 2016, through on or about September 1, 2016, in Kings County, and elsewhere in the State of New York, as profiteers, knowingly and unlawfully sold, on one or more occasions within six months or less, a narcotic drug, to wit: heroin, and the proceeds collected or due from such sale or sales had a total aggregate value of seventy-five thousand dollars or more.

### **ONE HUNDREDTH COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, of the



crime of **OPERATING AS A MAJOR TRAFFICKER**, in violation of Section 220.77(3) of the Penal Law of the State of New York, in that they, the said JUAN CARLOS ROMERO GOMEZ and OMAR HERNANDEZ, acting in concert, from on or before March 1, 2016, through on or about September 1, in Kings County, and elsewhere in the State of New York, as profiteers, knowingly and unlawfully possessed on one or more occasions within six months or less, a narcotic drug, to wit: heroin, with intent to sell the same, and such narcotic drugs had a total aggregate value of seventy-five thousand dollars or more.

#### **ONE HUNDRED FIRST COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, of the crime of **OPERATING AS A MAJOR TRAFFICKER**, in violation of Section 220.77(1) of the Penal Law of the State of New York, in that he, the said JULIO JONQUET CASTILLO, from on or before January 1, 2016, through on or about January 1, 2017, in Monroe County and elsewhere in the State of New York, acted as a director of a controlled substance organization during a period of twelve months or less, during which period the controlled substance organization sold one or more controlled substances, to wit: heroin, and the proceeds collected or due from such sale or sales had a total aggregate value of seventy-five thousand dollars or more.

#### **ONE HUNDRED SECOND COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, of the crime of **OPERATING AS A MAJOR TRAFFICKER**, in violation of Section 220.77(2) of the Penal Law of the State of New York, in that he, the said JULIO JONQUET CASTILLO, from on or before April 8, 2016, through on or about October 8, 2016, in Monroe County, as a profiteer, knowingly and unlawfully sold on one or more occasions within six months or less, a narcotic drug, to wit: heroin, and the proceeds

collected or due from such sale or sales had a total aggregate value of seventy-five thousand dollars or more.

**ONE HUNDRED THIRD COUNT**

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, JULIO JONQUET CASTILLO, of the crime of **OPERATING AS A MAJOR TRAFFICKER**, in violation of Section 220.77(3) of the Penal Law of the State of New York, in that he, the said JULIO JONQUET CASTILLO, from on or before April 8, 2016, through on or about October 8, 2016, in Monroe County, as a profiteer, knowingly and unlawfully possesses on one or more occasions within six months or less, a narcotic drug, to wit: heroin, with intent to sell the same, and such narcotic drugs had a total aggregate value of seventy-five thousand dollars or more.

PERI ALYSE KADANOFF  
Deputy Attorney General  
New York State Organized Crime Task Force

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BY: WENDY R. WHITING  
Assistant Deputy Attorney General  
New York State Organized Crime Task Force

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Foreperson  
MONROE County Grand Jury

Dated: \_\_\_\_\_