

STATE OF NEW YORK: SUPREME COURT  
BRONX COUNTY

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THE PEOPLE OF THE STATE OF NEW YORK

-against-

**MAYOLO TOXQUI,  
JUAN RODRIGUEZ,  
ANGEL MELENDEZ ORSINI,  
EDWIN VEGA,  
JAN SANTIAGO GARCIA,  
WILLIAM ESTRADA,  
WILBER MARQUEZ TORRES,  
JUAN JAVIER RIVERA,  
RAMON AMARO,  
GEORGE SUGGS,  
VICTOR HOLLOWAY,  
JAMILLE NELLY NIEVES,  
FRANCISCO VEGA VASQUEZ, and  
FRANCISCO VEGA CANCEL,**

Defendants.

INDICTMENT NO.  
3252 /2016  
GRAND JURY NO.  
44027/2016

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**COUNT ONE**

THE GRAND JURY by this indictment accuses the defendants MAYOLO TOXQUI, JUAN RODRIGUEZ, ANGEL MELENDEZ ORSINI, EDWIN VEGA, JAN SANTIAGO GARCIA, WILLIAM ESTRADA, WILBER MARQUEZ TORRES, JUAN JAVIER RIVERA, RAMON AMARO, GEORGE SUGGS, VICTOR HOLLOWAY, JAMILLE NELLY NIEVES, FRANCISCO VEGA VASQUEZ, and FRANCISCO VEGA CANCEL, 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 August 27, 2015, through October 24, 2016, in Bronx County, New York County, Kings County, Queens County, Westchester County, and elsewhere in and outside of the State of New York, with intent that conduct constituting the crime of Criminal Possession of a Controlled Substance in the First Degree in violation of Section 220.21(1) of the Penal Law,

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 as would constitute the above-mentioned Class A felony.

#### PREAMBLE

It was part of this conspiracy for the DEFENDANTS to knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug and said preparations, compounds, mixtures, or substances are of an aggregate weight of eight ounces or more, in Bronx County, New York County, Kings County, Queens County, Westchester County, and elsewhere in and outside of the State of New York.

It was also part of this conspiracy for EDWIN VEGA to direct WILLIAM ESTRADA to transport a kilogram of heroin to an unknown individual in Bronx County.

It was also part of this conspiracy for WILLIAM ESTRADA to deliver three kilograms of heroin to MAYOLO TOXQUI in Bronx County, who, in turn, transported said three kilograms of heroin to RAMON AMARO in Bronx County.

It was also part of this conspiracy for JUAN RODRIGUEZ in Bronx County, who, in turn, delivered said half kilogram of heroin to VICTOR HOLLOWAY and GEORGE SUGGS in Bronx County.

It was also part of this conspiracy for FRANCISCO VEGA VASQUEZ and FRANCISCO VEGA CANCEL to ship four kilograms of cocaine to Massachusetts to ultimately be delivered to JUAN RODRIGUEZ in Bronx County.

It was also part of this conspiracy for ANGEL MELENDEZ-ORSINI to direct JUAN JAVIER RIVERA and JAN SANTIAGO GARCIA to ship one kilogram of cocaine through the mail to WILBER MARQUEZ TORRES in Bronx County.

It was also part of this conspiracy for JAN SANTIAGO GARCIA to direct JAMILLE NELLY NIEVES to pick up nine kilograms of cocaine in New York County.

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

### OVERT ACTS

In furtherance of said conspiracy and to achieve the objects thereof, and during the course thereof, the following overt acts, among others, were committed:

1. On or about March 14, 2016, at approximately 8:15 p.m., JUAN RODRIGUEZ and GEORGE SUGGS had a telephone conversation during which the following exchange took place:

GS: Oh, you making, oh oh can, can you, can you be ready for me and my man Friday?

JR: Huh?

GS: Can you be ready for me and my man Friday?

JR: I don't know uh, which way, uptown downtown?

GS: Downtown.

JR: I don't know I got to check.

2. On or about March 20, 2016, at approximately 11:07 a.m., GEORGE SUGGS was observed entering JUAN RODRIGUEZ's automobile and exiting a short time later carrying a bag.
3. On or about March 20, 2016, at approximately 5:30 p.m., approximately five hundred and thirty eight grams of heroin were recovered, in Virginia, from a vehicle occupied by GEORGE SUGGS and VICTOR HOLLOWAY.
4. On or about May 3, 2016, at approximately 5:13 p.m., MAYOLO TOXQUI had a telephone conversation with RAMON AMARO during which the following exchange took place:

RA: Look tomorrow for the, the, the three rounds, right at the gym.  
MR: Three rounds, right there at the boxing gym?  
RA: Yes.

5. On or about May 4, 2016, at approximately 5:30 p.m., RAMON AMARO entered MAYOLO TOXQUI's vehicle and exited a short time later.
6. On or about May 4, 2016, at approximately 5:39 p.m., approximately three kilograms of heroin were recovered from RAMON AMARO's vehicle.
7. On or about May 16, 2016, at approximately 12:44 p.m., FRANCISCO VEGA VASQUEZ and JUAN RODRIGUEZ had a telephone conversation during which the following exchange took place:

FV: I always send you two girls.  
JR: Yes, yes.  
FV: That are with her.  
JR: Yes, I know.  
FV: Since there are four, you understand, since there are four, I'm going to use two different boxes.  
JR: Yes.

8. On or about May 16, 2016, at approximately 8:05 p.m., approximately three thousand nine hundred and ninety-four grams of cocaine were recovered from JUAN RODRIGUEZ.
9. On or about May 16, 2016, at approximately 9:50 p.m., FRANCISCO VEGA CANCEL and JUAN RODRIGUEZ had a telephone conversation during which the following exchange took place:

JR: Yeah so what I am going to do tomorrow? You know, how do I tell you? I don't know if you want to call me this week?  
FV: Look, how did they get you? Did they get you with the box made up or in the mailbox?  
JR: She brought two, two bags.  
FV: Uh huh.  
JR: She brought two bags. She put them in the front seat and she left before I did. I, I think I called your dad at that moment I told done. He told me to call as soon as you arrive and I said "yes" since I wasn't far from there.

10. On or about March 14, 2016, at approximately 6:50 p.m., MAYOLO TOXQUI and EDWIN VEGA had a telephone conversation, during which the following exchange took place:

MT: Yes, so look you think you can bring me a box from over there?  
EV: Yes, little brother.  
MT: Yes, what time?  
EV: Let me call the taxi brother and I'll call you back.

11. On or about March 14, 2016, at approximately 7:27 p.m., MAYOLO TOXQUI had a conversation with an unknown male during which MAYOLO TOXQUI stated: "be on the lookout. The taxi is dropping off a box of chelas."

12. On or about July 15, 2016, at approximately 1:14 p.m., EDWIN VEGA and WILLIAM ESTRADA had the following exchange via telephone conversation:

WE: He said no good, no good.  
EV: Get that shit back right away.  
WE: Ah?  
EV: We'll give it back right away the.

13. On or about July 15, 2016, at approximately 4:45 p.m., approximately nine hundred and seventy-six grams of heroin were recovered from WILLIAM ESTRADA's vehicle.

14. On or about July 14, 2015, at approximately 10:39 p.m., ANGEL MELENDEZ ORSINI, JUAN JAVIER RIVERA and WILBER MARQUEZ TORRES had a three-way phone conversation during which the following exchange occurred:

AMO: The number one is missing.  
WMT: Not the one in the Bronx. I didn't send it from my side, Queens.  
AMO: In that area, the Bronx  
WMT: Yes.  
AMO: Let me call him. Stay there.  
WMT: There are five numbers and five numbers are what you have boss.  
AMO: Can you hear me? Hello? Hello?  
JJR: Hello?  
AMO: You can hear me right?  
JJR: Yeah I can hear you.  
AMO: He's on the line. Explain it to him.  
JJR: When he sent it to me, I didn't realize it either but it needed the number one.

WMT: No, no, no because it's in the Bronx. I have the address I sent him, he was working and it's the same five numbers.  
JJR: You want me to send it to you? You sent it to me. I have it that one and hear me out it says 2100 Newbold Avenue, number one. Number one.  
WMT: The apartment?  
JJR: Huh?  
WMT: The apartment is the first floor.  
JJR: That's why it couldn't be delivered because the number one wasn't on there.

15. On or about July 15, 2016, a package addressed to 2100 Newbold Avenue was secured and recovered and found to contain approximately nine hundred and ninety-nine grams of cocaine.

16. On or about July 27, 2016, at approximately 10:56 p.m., ANGEL MELENDEZ-ORSINI sent a text message to JAN SANTIAGO GARCIA which stated "Jos. c torres torres 108 chris topher ave apt 8 c Brooklyn ny 11212".

17. On or about August 22, 2016, a package addressed to "Jos. Torres 108 Christopher Avenue Apartment 8c, Brooklyn, NY 11212" was recovered and found to contain approximately one thousand and four grams of cocaine.

18. On or about June 9, 2016, at approximately 6:14 p.m., WILBER MARQUEZ TORRES and JUAN RODRIGUEZ had a telephone conversation, during which the following exchange occurred:

JR: This time can you put them in pieces like the last time?  
WT: Of one hundred?  
JR: Yes.  
WT: Okay, no problem.  
JR: But one of those pieces are going to be eighty, okay?  
WT: Of eighty? Yes I know.

19. On or about August 25, 2016, at approximately 12:39 a.m. JAN SANTIAGO GARCIA had a telephone conversation with JAMILLE NELLY NIEVES, during which the following exchange took place:

JNN: Everything is there because I counted them and they are there.  
JSG: You counted ten?

JNN: Nine. The tenth I'm picking up in Providence.

JSG: What?

JNN: Number ten I'm picking up in Providence. There are nine here.

20. On or about August 25, 2016, at approximately 1:21 a.m., approximately nine hundred and ninety eight grams of cocaine and eight additional kilograms of powdery substance was recovered in JAMILLE NELLY NIEVES's vehicle.

21. On or about August 25, 2016, at approximately 2:25 a.m., JAN SANTIAGO GARCIA and JAMILLE NELLY NIEVES had a telephone conversation, during which the following exchange took place:

JSG: What do you mean that they just got you?

JNN: They stopped us. They stopped us.

### COUNT TWO

THE GRAND JURY by this indictment further accuses the defendant EDWIN VEGA 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, committed as follows:

Said defendant, acting in concert with others, each aiding the other, on or about and between March 14, 2016 and July 15, 2016, in Bronx County and elsewhere, within and outside of the State of New York, as a profiteer, did knowingly and unlawfully possess, on one or more occasions a narcotic drug, to wit heroin, with intent to sell the same, and said heroin had a total aggregate value of seventy-five thousand dollars or more.

### COUNT THREE

THE GRAND JURY by this indictment further accuses the defendant JUAN RODRIGUEZ 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, committed as follows:

Said defendant, acting in concert with others, each aiding the other, on or about and between February 13, 2016 and May 25, 2016, in Bronx County and elsewhere, within and outside of the State of New York, as a profiteer, did knowingly and unlawfully possess, on one or more occasions a narcotic drug, to wit heroin and cocaine, with intent to sell the same, and said heroin and cocaine had a total aggregate value of seventy-five thousand dollars or more.

#### COUNT FOUR

THE GRAND JURY by this indictment further accuses the defendant FRANCISCO VEGA VASQUEZ and FRANCISCO VEGA CANCEL 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, committed as follows:

Said defendants, acting in concert with each other and others, each aiding the other, on or about and between February 18, 2016 and May 25, 2016, in Bronx County and elsewhere, within and outside of the State of New York, as a profiteer, did knowingly and unlawfully possess, on one or more occasions a narcotic drug, to wit cocaine, with intent to sell the same, and said cocaine had a total aggregate value of seventy-five thousand dollars or more.

#### COUNT FIVE

THE GRAND JURY by this indictment further accuses the defendant ANGEL MELENDEZ ORSINI 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, committed as follows:

Said defendant, acting in concert with others, each aiding the other, on or about and between July 15, 2016 and August 22, 2016, in Bronx County and elsewhere, within and outside of the State of New York, as a profiteer, did knowingly and unlawfully possess, on one or more occasions a narcotic drug, to wit cocaine, with intent to sell the same, and said cocaine had a total aggregate value of seventy-five thousand dollars or more.

### COUNT SIX

THE GRAND JURY by this indictment further accuses the defendant JAN SANTIAGO GARCIA 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, committed as follows:

Said defendant, acting in concert with others, each aiding the other, on or about and between July 30, 2016 and August 25, 2016, in Bronx County and elsewhere, within and outside of the State of New York, as a profiteer, did knowingly and unlawfully possess, on one or more occasions a narcotic drug, to wit cocaine, with intent to sell the same, and said cocaine had a total aggregate value of seventy-five thousand dollars or more.

### COUNT SEVEN

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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, committed as follows:

Said defendant, on or about August 27, 2015, in Bronx County, knowingly and unlawfully sold a preparation, compound, mixture or substance containing a narcotic drug, to wit cocaine and was of an aggregate weight of approximately twenty grams.

### COUNT EIGHT

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 August 27, 2015, in Bronx County, knowingly and unlawfully sold narcotic drugs, to wit, cocaine and heroin.

**COUNT NINE**

THE GRAND JURY by this indictment further accuses the defendants MAYOLO TOXQUI 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 August 27, 2015, in Bronx County, did knowingly and unlawfully possess narcotic drugs, to wit, cocaine and heroin, with intent to sell it.

**COUNT TEN**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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, committed as follows:

Said defendant, on or about September 15, 2015, in Bronx County, knowingly and unlawfully sold two preparations, compounds, mixtures or substances, each containing a narcotic drug, to wit cocaine and heroin, respectively, which preparations were of an aggregate weight of approximately twenty grams.

**COUNT ELEVEN**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 September 15, 2015, in Bronx County, knowingly and unlawfully sold narcotic drugs, to wit, cocaine and heroin.

**COUNT TWELVE**

THE GRAND JURY by this indictment further accuses the defendants MAYOLO TOXQUI 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 September 15, 2015, in Bronx County, did knowingly and unlawfully possess narcotic drugs, to wit, cocaine and heroin, with intent to sell it.

**COUNT THIRTEEN**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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, committed as follows:

Said defendant, on or about September 25, 2015, in Bronx County, knowingly and unlawfully sold a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately twenty nine grams.

**COUNT FOURTEEN**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 September 25, 2015, in Bronx County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

**COUNT FIFTEEN**

THE GRAND JURY by this indictment further accuses the defendants MAYOLO TOXQUI 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 September 25, 2015, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT SIXTEEN**

THE GRAND JURY by this indictment further accuses the defendant EDWIN VEGA and WILLIAM ESTRADA 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, committed as follows:

Said defendants, each aiding the other and acting in concert, on or about September 25, 2015, in Bronx County, knowingly and unlawfully sold a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately fifteen grams.

**COUNT SEVENTEEN**

THE GRAND JURY by this indictment further accuses the defendant EDWIN VEGA and WILLIAM ESTRADA 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, each aiding the other and acting in concert, on or about September 25, 2015, in Bronx County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

**COUNT EIGHTEEN**

THE GRAND JURY by this indictment further accuses the defendants EDWIN VEGA and WILLIAM ESTRADA 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, each aiding the other and acting in concert, each aiding the other and acting in concert, on or about September 25, 2015, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT NINETEEN**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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, committed as follows:

Said defendant, on or about October 6, 2015, in Bronx County, knowingly and unlawfully sold a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately twenty nine grams.

**COUNT TWENTY**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 October 6, 2015, in Bronx County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

**COUNT TWENTY-ONE**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 October 6, 2015, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT TWENTY-TWO**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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, committed as follows:

Said defendant, on or about October 27, 2015, in Bronx County, knowingly and unlawfully sold a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately thirty nine grams.

**COUNT TWENTY-THREE**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 October 27, 2015, in Bronx County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

**COUNT TWENTY-FOUR**

THE GRAND JURY by this indictment further accuses the defendants MAYOLO TOXQUI 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 October 27, 2015, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT TWENTY-FIVE**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 February 14, 2016, in Bronx County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

**COUNT TWENTY-SIX**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 February 14, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT TWENTY-SEVEN**

THE GRAND JURY by this indictment further accuses the defendant JUAN 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, committed as follows:

Said defendant, on or about February 14, 2016, in Bronx County, knowingly and unlawfully sold a narcotic drug, to wit, heroin.

**COUNT TWENTY-EIGHT**

THE GRAND JURY by this indictment further accuses the defendant JUAN 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, committed as follows:

Said defendant, on or about February 14, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT TWENTY NINE**

THE GRAND JURY by this indictment further accuses the defendant GEORGE SUGGS 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 February 14, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT THIRTY**

THE GRAND JURY by this indictment further accuses the defendants FRANCISCO VEGA VASQUEZ and FRANCISCO VEGA CANCEL 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, each aiding the other, on or about February 18, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

**COUNT THIRTY-ONE**

THE GRAND JURY by this indictment further accuses the defendants FRANCISCO VEGA VASQUEZ and FRANCISCO VEGA CANCEL 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, each aiding the other, on or about February 18, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

**COUNT THIRTY-TWO**

THE GRAND JURY by this indictment further accuses the defendant JUAN 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, committed as follows:

Said defendant, on or about February 18, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

**COUNT THIRTY-THREE**

THE GRAND JURY by this indictment further accuses the defendants EDWIN VEGA and WILLIAM ESTRADA 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, each aiding the other, on or about March 14, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

**COUNT THIRTY-FOUR**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 March 14, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

**COUNT THIRTY-FIVE**

THE GRAND JURY by this indictment further accuses the defendants EDWIN VEGA and WILLIAM ESTRADA 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, each aiding the other, on or about March 14, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT THIRTY-SIX**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 March 14, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT THIRTY-SEVEN**

THE GRAND JURY by this indictment further accuses the defendant EDWIN VEGA 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 March 19, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

**COUNT THIRTY-EIGHT**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 March 19, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

**COUNT THIRTY-NINE**

THE GRAND JURY by this indictment further accuses the defendant EDWIN VEGA 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 March 19, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT FORTY**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 March 19, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT FORTY-ONE**

THE GRAND JURY by this indictment further accuses the defendant RAMON AMARO 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 March 19, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT FORTY-TWO**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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, committed as follows:

Said defendant, on or about March 20, 2016, in Bronx County, knowingly and unlawfully sold a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately five hundred thirty-eight grams.

**COUNT FORTY-THREE**

THE GRAND JURY by this indictment further accuses the defendant JUAN 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, committed as follows:

Said defendant, on or about March 20, 2016, in Bronx County, knowingly and unlawfully sold a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately five hundred thirty-eight grams.

**COUNT FORTY-FOUR**

THE GRAND JURY by this indictment further accuses the defendant GEORGE SUGGS 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, committed as follows:

Said defendant, on or about March 20, 2016, in Bronx County, knowingly and unlawfully sold a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately five hundred thirty-eight grams.

**COUNT FORTY-FIVE**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 defendant, on or about March 20, 2016, in Bronx County, knowingly and unlawfully possessed a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately five hundred thirty-eight grams.

**COUNT FORTY-SIX**

THE GRAND JURY by this indictment further accuses the defendant JUAN 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 defendant, on or about March 20, 2016, in Bronx County, knowingly and unlawfully possessed a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately five hundred thirty-eight grams.

**COUNT FORTY-SEVEN**

THE GRAND JURY by this indictment further accuses the defendant GEORGE SUGGS 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 defendant, on or about March 20, 2016, in Bronx County, knowingly and unlawfully possessed a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately five hundred thirty-eight grams.

**COUNT FORTY-EIGHT**

THE GRAND JURY by this indictment further accuses the defendant VICTOR HOLLOWAY 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 defendant, on or about March 20, 2016, in Bronx County, knowingly and unlawfully possessed a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately five hundred thirty-eight grams.

**COUNT FORTY-NINE**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 March 20, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

**COUNT FIFTY**

THE GRAND JURY by this indictment further accuses the defendant JUAN 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, committed as follows:

Said defendant on or about March 20, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

**COUNT FIFTY-ONE**

THE GRAND JURY by this indictment further accuses the defendant GEORGE SUGGS 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 March 20, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

**COUNT FIFTY-TWO**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 March 20, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT FIFTY-THREE**

THE GRAND JURY by this indictment further accuses the defendant JUAN 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, committed as follows:

Said defendant on or about March 20, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT FIFTY-FOUR**

THE GRAND JURY by this indictment further accuses the defendant GEORGE SUGGS 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 March 20, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT FIFTY-FIVE**

THE GRAND JURY by this indictment further accuses the defendant VICTOR HOLLOWAY 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 March 20, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT FIFTY-SIX**

THE GRAND JURY by this indictment further accuses the defendants EDWIN VEGA and WILLIAM ESTRADA 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, each aiding the other, on or about April 25, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

**COUNT FIFTY-SEVEN**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 April 25, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

**COUNT FIFTY-EIGHT**

THE GRAND JURY by this indictment further accuses the defendants EDWIN VEGA and WILLIAM ESTRADA 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, each aiding the other, on or about April 25, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT FIFTY-NINE**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 April 25, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT SIXTY**

THE GRAND JURY by this indictment further accuses the defendants EDWIN VEGA and WILLIAM ESTRADA 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, committed as follows:

Said defendants, acting in concert, each aiding the other, on or about May 4, 2016, in Bronx County, knowingly and unlawfully sold a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately three thousand and one grams.

**COUNT SIXTY-ONE**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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, committed as follows:

Said defendant, on or about May 4, 2016, in Bronx County, knowingly and unlawfully sold a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately three thousand and one grams.

**COUNT SIXTY-TWO**

THE GRAND JURY by this indictment further accuses the defendant EDWIN VEGA and WILLIAM ESTRADA 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, each aiding the other, on or about May 4, 2016, in Bronx County, knowingly and unlawfully possessed a preparation, compound, mixture or

substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately three thousand and one grams.

**COUNT SIXTY-THREE**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 defendant, on or about May 4, 2016, in Bronx County, knowingly and unlawfully possessed a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately three thousand and one grams.

**COUNT SIXTY-FOUR**

THE GRAND JURY by this indictment further accuses the defendant RAMON AMARO 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 defendant, on or about May 4, 2016, in Bronx County, knowingly and unlawfully possessed a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately three thousand and one grams.

**COUNT SIXTY-FIVE**

THE GRAND JURY by this indictment further accuses the defendants, EDWIN VEGA and WILLIAM ESTRADA, 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, each aiding the other, on or about May 4, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

**COUNT SIXTY-SIX**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 May 4, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, heroin.

**COUNT SIXTY-SEVEN**

THE GRAND JURY by this indictment further accuses the defendants, EDWIN VEGA and WILLIAM ESTRADA, 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, each aiding the other, on or about May 4, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT SIXTY-EIGHT**

THE GRAND JURY by this indictment further accuses the defendant MAYOLO TOXQUI 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 May 4, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT SIXTY-NINE**

THE GRAND JURY by this indictment further accuses the defendant RAMON AMARO 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 May 4, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT SEVENTY**

THE GRAND JURY by this indictment further accuses the defendants FRANCISCO VEGA VASQUEZ and FRANCISCO VEGA CANCEL 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, committed as follows:

Said defendants, acting in concert, each aiding the other, on or about May 16, 2016, in Bronx County, knowingly and unlawfully sold a preparation, compound, mixture or substance, containing a narcotic drug, to wit, cocaine, which preparation was of an aggregate weight of approximately three thousand nine hundred and ninety-four grams.

**COUNT SEVENTY-ONE**

THE GRAND JURY by this indictment further accuses the defendant FRANCISCO VEGA VASQUEZ and FRANCISCO VEGA CANCEL 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, each aiding the other, on or about May 16, 2016, in Bronx County, knowingly and unlawfully possessed a preparation, compound, mixture or substance, containing a narcotic drug, to wit, cocaine, which preparation was of an aggregate weight of approximately three thousand nine hundred and ninety-four grams.

**COUNT SEVENTY-TWO**

THE GRAND JURY by this indictment further accuses the defendant JUAN 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 defendant, on or about May 16, 2016, in Bronx County, knowingly and unlawfully possessed a preparation, compound, mixture or substance, containing a narcotic drug, to wit, cocaine, which preparation was of an aggregate weight of approximately three thousand nine hundred and ninety-four grams.

**COUNT SEVENTY-THREE**

THE GRAND JURY by this indictment further accuses the defendants, FRANCISCO VEGA VASQUEZ and FRANCISCO VEGA CANCEL, 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, each aiding the other, on or about May 16, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

**COUNT SEVENTY-FOUR**

THE GRAND JURY by this indictment further accuses the defendants, FRANCISCO VEGA VASQUEZ and FRANCISCO VEGA CANCEL, 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, each aiding the other, on or about May 16, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

**COUNT SEVENTY-FIVE**

THE GRAND JURY by this indictment further accuses the defendant JUAN 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, committed as follows:

Said defendant on or about March 16, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

**COUNT SEVENTY-SIX**

THE GRAND JURY by this indictment further accuses the defendant FRANCISCO VEGA VASQUEZ 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 May 25, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

**COUNT SEVENTY-SEVEN**

THE GRAND JURY by this indictment further accuses the defendant FRANCISCO VEGA VASQUEZ 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 May 25, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

**COUNT SEVENTY-EIGHT**

THE GRAND JURY by this indictment further accuses the defendant JUAN 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, committed as follows:

Said defendant on or about May 25, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

**COUNT SEVENTY-NINE**

THE GRAND JURY by this indictment further accuses the defendant EDWIN VEGA and WILLIAM ESTRADA 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, each aiding the other, on or about July 15, 2016, in Bronx County, knowingly and unlawfully possessed a preparation, compound, mixture or substance, containing a narcotic drug, to wit, heroin, which preparation was of an aggregate weight of approximately nine hundred and seventy-six grams.

**COUNT EIGHTY**

THE GRAND JURY by this indictment further accuses the defendants, EDWIN VEGA and WILLIAM ESTRADA, 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, each aiding the other, on or about July 15, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, heroin, with intent to sell it.

**COUNT EIGHTY-ONE**

THE GRAND JURY by this indictment further accuses the defendants ANGEL MELENDEZ ORSINI and JUAN JAVIER RIVERA 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, committed as follows:

Said defendants, acting in concert, each aiding the other, on or about July 15, 2016, in Bronx County, knowingly and unlawfully sold a preparation, compound, mixture or substance, containing a narcotic drug, to wit, cocaine, which preparation was of an aggregate weight of approximately nine hundred and ninety-nine grams.

**COUNT EIGHTY-TWO**

THE GRAND JURY by this indictment further accuses the defendants, ANGEL MELENDEZ ORSINI and JUAN JAVIER RIVERA, 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, each aiding the other, on or about July 15, 2016, in Bronx County, knowingly and unlawfully possessed a preparation, compound, mixture or substance, containing a narcotic drug, to wit, cocaine, which preparation was of an aggregate weight of approximately nine hundred and ninety-nine grams.

**COUNT EIGHTY-THREE**

THE GRAND JURY by this indictment further accuses the defendant WILBER MARQUEZ TORRES of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A**

**CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of Section 110/220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about July 15, 2016, in Bronx County, knowingly and unlawfully attempted to possess a preparation, compound, mixture or substance, containing a narcotic drug, to wit, cocaine, which preparation was of an aggregate weight of approximately nine hundred and ninety-nine grams.

**COUNT EIGHTY-FOUR**

THE GRAND JURY by this indictment further accuses the defendants, ANGEL MELENDEZ ORSINI and JUAN JAVIER RIVERA, 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, each aiding the other, on or about July 15, 2016, in Bronx County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

**COUNT EIGHTY-FIVE**

THE GRAND JURY by this indictment further accuses the defendants, ANGEL MELENDEZ ORSINI and JUAN JAVIER RIVERA, 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, each aiding the other, on or about July 15, 2016, in Bronx County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

**COUNT EIGHTY-SIX**

THE GRAND JURY by this indictment further accuses the defendant WILBER MARQUEZ TORRES of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A**

**CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 110/220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant on or about July 15, 2016, in Bronx County, did knowingly and unlawfully attempt to possess a narcotic drug, to wit, cocaine, with intent to sell it.

**COUNT EIGHTY-SEVEN**

THE GRAND JURY by this indictment further accuses the defendants, ANGEL MELENDEZ ORSINI, JAN SANTIAGO GARCIA and JUAN JAVIER RIVERA, 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, each aiding the other, on or about July 30, 2016, in Kings County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

**COUNT EIGHTY-EIGHT**

THE GRAND JURY by this indictment further accuses the defendants, ANGEL MELENDEZ ORSINI, JAN SANTIAGO GARCIA and JUAN JAVIER RIVERA, 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, each aiding the other, on or about July 30, 2016, in Kings County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

**COUNT EIGHTY-NINE**

THE GRAND JURY by this indictment further accuses the defendant WILBER MARQUEZ TORRES 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 July 30, 2016, in Kings County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

**COUNT NINETY**

THE GRAND JURY by this indictment further accuses the defendants, ANGEL MELENDEZ ORSINI, JAN SANTIAGO GARCIA and JUAN JAVIER RIVERA, 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, each aiding the other, on or about August 9, 2016, in Queens County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

**COUNT NINETY-ONE**

THE GRAND JURY by this indictment further accuses the defendants, ANGEL MELENDEZ ORSINI, JAN SANTIAGO GARCIA and JUAN JAVIER RIVERA, 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, each aiding the other, on or about August 9, 2016, in Queens County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

**COUNT NINETY-TWO**

THE GRAND JURY by this indictment further accuses the defendant WILBER MARQUEZ TORRES 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 August 9, 2016, in Queens County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

**COUNT NINETY-THREE**

THE GRAND JURY by this indictment further accuses the defendants ANGEL MELENDEZ ORSINI, JAN SANTIAGO GARCIA and JUAN JAVIER RIVERA 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, committed as follows:

Said defendants, acting in concert, each aiding the other, on or about August 22, 2016, in Kings County, knowingly and unlawfully sold a preparation, compound, mixture or substance, containing a narcotic drug, to wit, cocaine, which preparation was of an aggregate weight of approximately one thousand and four grams.

**COUNT NINETY-FOUR**

THE GRAND JURY by this indictment further accuses the defendants, ANGEL MELENDEZ ORSINI, JAN SANTIAGO GARCIA and JUAN JAVIER RIVERA, 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, each aiding the other, on or about August 22, 2016, in Kings County, knowingly and unlawfully possessed a preparation, compound, mixture or substance, containing a narcotic drug, to wit, cocaine, which preparation was of an aggregate weight of approximately one thousand and four grams.

**COUNT NINETY-FIVE**

THE GRAND JURY by this indictment further accuses the defendant WILBER MARQUEZ TORRES of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of Section 110/220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about August 22, 2016, in Kings County, knowingly and unlawfully attempted to possess a preparation, compound, mixture or substance, containing a narcotic drug, to wit, cocaine, which preparation was of an aggregate weight of approximately one thousand and four grams.

**COUNT NINETY-SIX**

THE GRAND JURY by this indictment further accuses the defendants, ANGEL MELENDEZ ORSINI, JAN SANTIAGO GARCIA and JUAN JAVIER RIVERA, 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, each aiding the other, on or about August 22, 2016, in Kings County, did knowingly and unlawfully sell a narcotic drug, to wit, cocaine.

**COUNT NINETY-SEVEN**

THE GRAND JURY by this indictment further accuses the defendants, ANGEL MELENDEZ ORSINI, JAN SANTIAGO GARCIA and JUAN JAVIER RIVERA, 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, each aiding the other, on or about August 22, 2016, in Kings County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

**COUNT NINETY-EIGHT**

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

Said defendant on or about August 22, 2016, in Bronx County, did knowingly and unlawfully attempt to possess a narcotic drug, to wit, cocaine, with intent to sell it.

**COUNT NINETY-NINE**

THE GRAND JURY by this indictment further accuses the defendants, JAN SANTIAGO GARCIA and JAMILLE NELLY NIEVES, 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, each aiding the other, on or about August 25, 2016, in Westchester County, knowingly and unlawfully possessed a preparation, compound, mixture or substance, containing a narcotic drug, to wit, cocaine, which preparation was of an aggregate weight of approximately nine hundred and ninety-eight grams.

**COUNT ONE HUNDRED**

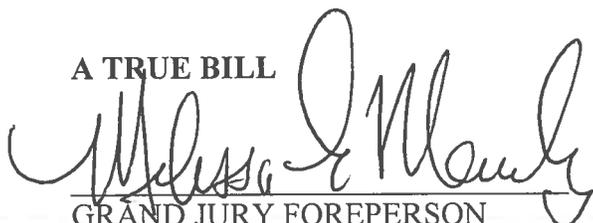
THE GRAND JURY by this indictment further accuses the defendants, JAN SANTIAGO GARCIA and JAMILLE NELLY NIEVES, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, each aiding the other, on or about August 25, 2016, in Westchester County, did knowingly and unlawfully possess a narcotic drug, to wit, cocaine, with intent to sell it.

Dated: October 25, 2016  
Bronx, New York

PERI ALYSE KADANOFF  
Deputy Attorney General  
Organized Crime Task Force

By   
HOWARD FELDBERG  
Assistant Deputy Attorney General

**A TRUE BILL**  
  
GRAND JURY FOREPERSON  
Dated: October 25, 2016