

STATE OF NEW YORK COUNTY COURT
COUNTY OF ONONDAGA

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

-against-

BAYRON CASTRO, a/k/a “Hov”
JOSE COSME
JEAN CARLOS CRUZ
MIGUEL CRUZ, a/k/a “G”
LAMELL DAVIS, a/k/a “Melly,” or “O’Melly,” a/k/a “Felix”
JOHNATHAN DELGADO, a/k/a “Green Eyes”
TERRAH FREDERICK
JAIDYN FREEMAN, a/k/a “Jaido”
SHAWN GIFFORD, a/k/a “Nani”
MICHAEL HUDGINS
XAVIER JACKSON
KWAMEA JENKINS
LUIS MIGUEL JOAQUIN
DAVID KALET
JAMES KELLEY
CHRISTOPHER LANZAFAME
DEVINE MOBLEY
JAMES ODOM
KEENAN SCOTT, a/k/a “Kasey”
JAMAR SHEPPARD, a/k/a “Ski”
CARLOS TORRES
JEFFREY WALTS
TEVON WEBB, a/k/a “Tay”

Defendants.

SEALED
INDICTMENT
Indict No. 2023-0639 (1 - 23)

Index No. 2023-11403

OCTF 22-012S

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Count One

THE GRAND JURY OF ONONDAGA COUNTY, by this indictment, accuses the defendants, BAYRON CASTRO, a/k/a “Hov” (hereinafter “Bayron Castro”), JOSE COSME, JEAN CARLOS CRUZ, MIGUEL CRUZ, a/k/a “G” (hereinafter “Miguel Cruz”), LAMELL DAVIS, JOHNATHAN DELGADO, TERRAH FREDERICK, JAIDYN FREEMAN, SHAWN GIFFORD, MICHAEL HUDGINS, XAVIER JACKSON, KWAMEA JENKINS, LUIS MIGUEL JOAQUIN, DAVID KALET, JAMES KELLEY, CHRISTOPHER LANZAFAME, DEVINE MOBLEY, JAMES ODOM, KEENAN SCOTT, JAMAR SHEPPARD, CARLOS TORRES,

JEFFREY WALTS, and TEVON WEBB 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 July 14, 2022, through on or about August 23, 2023, in Onondaga County, Oswego County, St. Lawrence County and Bronx County in the State of New York and elsewhere, 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 Class A felonies, be committed, the defendants knowingly and intentionally agreed with each other and with others, known and unknown, to engage in or cause the performance of such conduct.

PREAMBLE

It was part of this conspiracy to possess narcotics in amounts of four ounces or more and/or to possess methamphetamine in amounts of two ounces or more, and/or to sell narcotics and/or methamphetamine in amounts of one-half ounce or more in Onondaga County, Oswego County, St. Lawrence County, and Bronx County in the State of New York and elsewhere.

It was also part of this conspiracy for BAYRON CASTRO to sell narcotic drugs to MIGUEL CRUZ, SHAWN GIFFORD, KWAMEA JENKINS, and others.

It was also part of this conspiracy for JOSE COSME to store narcotics for BAYRON CASTRO and to work in conjunction with BAYRON CASTRO to sell narcotic drugs to SHAWN GIFFORD, XAVIER JACKSON, and others.

It was also part of this conspiracy for MIGUEL CRUZ to distribute and store narcotic drugs in conjunction with JEAN CARLOS CRUZ and to sell narcotic drugs to LAMELL DAVIS and others.

It was also part of this conspiracy for JEAN CARLOS CRUZ to work in conjunction with MIGUEL CRUZ to store and distribute narcotics and to sell narcotic drugs to LAMELL DAVIS, DAVID KALET, and others.

It was also part of this conspiracy for LAMELL DAVIS to obtain narcotic drugs from JEAN CARLOS CRUZ, MIGUEL CRUZ, and MICHAEL HUDGINS and to sell narcotic drugs to JAIDYN FREEMAN, TERRAH FREDERICK, JEFFREY WALTS, and others.

It was also part of this conspiracy for JOHNATHAN DELGADO and XAVIER JACKSON to obtain narcotic drugs from BAYRON CASTRO to sell to SHAWN GIFFORD and others.

It was also part of this conspiracy for SHAWN GIFFORD to obtain narcotic drugs from BAYRON CASTRO, JOSE COSME and JOHNATHAN DELGADO, and to sell narcotic drugs to KWAMEA JENKINS, JAMES ODOM, KEENAN SCOTT, and others.

It was also part of this conspiracy for MICHAEL HUDGINS to sell narcotic drugs to LAMELL DAVIS and others.

It was also part of this conspiracy for LUIS MIGUEL JOAQUIN to sell narcotic drugs to BAYRON CASTRO and others.

It was also part of this conspiracy for JAMES KELLEY to obtain narcotic drugs from KEENAN SCOTT to sell to CHRISTOPHER LANZAFAME and others.

It was also part of this conspiracy for DEVINE MOBLEY to sell narcotic drugs to KEENAN SCOTT and others.

It was also part of this conspiracy for JAMES ODOM to obtain narcotic drugs from SHAWN GIFFORD and to sell narcotic drugs to KEENAN SCOTT and others.

It was also part of this conspiracy for KEENAN SCOTT to obtain narcotic drugs from DEVINE MOBLEY, JAMES ODOM, and JAMAR SHEPPARD, and to sell narcotic drugs to JAMES KELLEY, CHRISTOPHER LANZAFAME, and others.

It was also part of this conspiracy for JAMAR SHEPPARD to supply narcotic drugs to KEENAN SCOTT and others.

It was also part of this conspiracy for CARLOS TORRES to sell narcotic drugs to JEAN CARLOS CRUZ and others.

It was also part of this conspiracy for TERRAH FREDERICK, JAIDYN FREEMAN, KWAMEA JENKINS, DAVID KALET, CHRISTOPHER LANZAFAME, and TEVON WEBB to sell narcotic drugs to others.

It was also part of this conspiracy for LAMELL DAVIS and KWAMEA JENKINS to possess methamphetamine in amounts of two ounces or more and to sell to methamphetamine to others.

It was also part of this conspiracy for JAMES ODOM and JEFFREY WALTS to possess methamphetamine to sell to others.

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

OVERT ACTS

In the furtherance of the conspiracy and to affect the objects thereof, from on or before July 14, 2022, through on or about August 23, 2023, the following overt acts, among others, were committed:

1. On or about July 14, 2022, KEENAN SCOTT distributed narcotic drugs to a person known to the Grand Jury in the City of Syracuse, Onondaga County.
2. On or about August 11, 2022, JAMES ODOM provided fentanyl to KEENAN SCOTT to distribute to a person known to the Grand Jury in the City of Syracuse, Onondaga County.

3. On or about October 28, 2022, in a series of coded, guarded, and cryptic telephone conversations, JAIDYN FREEMAN agreed to provide narcotic drugs in packages bearing the “PS 5” stamp to KEENAN SCOTT at his residence in the City of Syracuse, Onondaga County.

4. On or about November 2, 2022, during a series of coded, guarded and cryptic telephone communications, JAMES KELLEY ordered “four” quantities of narcotic drugs from KEENAN SCOTT and told SCOTT he would then “grab more tomorrow” after he met with his customer and got “the rest of the money,” and then agreed to meet SCOTT at the Dinosaur Bar-B-Que restaurant in the City of Syracuse, Onondaga County, to conduct the transaction.

5. On or about November 6, 2022, during a coded, guarded, and cryptic telephone conversation, DEVINE MOBLEY told KEENAN SCOTT that he was driving to Solvay, Onondaga County, to sell controlled substances to his customers, whom he described as “my peoples.”

6. On or about November 11, 2022, during a series of coded, guarded, and cryptic telephone conversations, CHRISTOPHER LANZAFAME ordered a quantity of narcotic drugs to resell from JAMES KELLEY.

7. On or about November 14, 2022, during a series of coded, guarded, and cryptic telephone conversations, DEVINE MOBLEY agreed to distribute narcotic drugs, which he described as bearing “either the Krispy or Rolls Royce” stamps, to KEENAN SCOTT at Mobley’s residence in the City of Syracuse, Onondaga County.

8. On or about November 16, 2022, in a series of coded, guarded, and cryptic telephone conversations, CHRISTOPHER LANZAFAME ordered a quantity of narcotics to resell from KEENAN SCOTT.

9. On or about November 16, 2022, in a coded, guarded, and cryptic telephone conversation, JAMAR SHEPPARD agreed drive KEENAN SCOTT to distribute narcotic drugs.

10. On or about November 16, 2022, JEFFREY WALTS traveled to the City of Syracuse, Onondaga County, to procure controlled substances from LAMELL DAVIS.

11. On or about November 26, 2022, in a coded, guarded, and cryptic telephone communication, LAMELL DAVIS agreed to distribute a pound of methamphetamine to JEFFREY WALTS at WALTS' residence in the Town of Hastings, Oswego County.

12. On or about November 26, 2022, in a series of coded, guarded, and cryptic telephone communications with LAMELL DAVIS, JEFFREY WALTS complained that the methamphetamine he received from DAVIS only weighed "11.5 ounces" and that WALTS' customers had "walked" until WALTS had "handled" the matter with DAVIS.

13. On or about December 12, 2022, JAMAR SHEPPARD provided narcotic drugs to KEENAN SCOTT in the parking lot at Destiny USA in the City of Syracuse, Onondaga County.

14. On or about December 12, 2022, KEENAN SCOTT provided narcotic drugs to JAMES KELLEY in the parking lot at Destiny USA in the City of Syracuse, Onondaga County.

15. On or about December 18, 2022, in a series of coded, guarded, and cryptic telephone communications, KWAMEA JENKINS told a customer he had "100" quantities of narcotic drugs available and agreed to travel to Ogdensburg, St. Lawrence County, to distribute them to her.

16. On or about December 22, 2022, in a coded, guarded, and cryptic telephone conversation, KWAMEA JENKINS ordered "50" quantities of narcotics drugs from BAYRON CASTO and requested that CASTRO supply him with narcotics in packages bearing "City" and "KREME" stamps.

17. On or about December 26, 2022, in a coded, guarded and cryptic telephone conversation, JAIDYN FREEMAN ordered "two houses," meaning two packages, each containing 50-envelopes of a narcotic drug, from LAMELL DAVIS.

18. On or about January 9, 2023, KWAMEA JENKINS possessed controlled substances containing methamphetamine with an aggregate weight of two ounces or more, as well as glassine envelopes containing controlled substances including fentanyl and heroin with an aggregate weight of one-eighth ounce or more, in the Town of Mexico, Oswego County.

19. On or about January 10, 2023, during a coded, guarded and cryptic telephone conversation, LAMELL DAVIS told another person that he wanted to go “OT,” meaning out of town, because his narcotics source, who he referred to as “my people,” had just given DAVIS “a whole half brick of this purple fire fatty,” referring to a one-half kilogram supply of fentanyl, and DAVIS claimed he could profit “at least 60, 70 thousand” dollars from selling those narcotic drugs.

20. On or about January 11, 2023, JOHNATHAN DELGADO delivered narcotic drugs to SHAWN GIFFORD at 418 Fabius Street in the City of Syracuse, Onondaga County.

21. On January 15, 2023, during a series of coded, guarded and cryptic telephone conversations with BAYRON CASTRO, JOSE COSME agreed to “put four blocks,” meaning 5,000 glassine envelopes containing narcotic drugs, in “a bag” and then carry the bag “downstairs” to the lobby of 418 Fabius Street in City of Syracuse, Onondaga County.

22. On or about January 16, 2023, during a series of coded, guarded, and cryptic telephone conversations with BAYRON CASTRO, XAVIER JACKSON agreed to “go to Fabius” Street, in the City of Syracuse, Onondaga County, and meet a male in apartment 707 in order to acquire narcotics to sell to another person.

23. On or about January 16, 2023, during a series of coded, guarded, and cryptic telephone conversations, BAYRON CASTRO asked JOSE COSME to put “four little blocks,” meaning 5,000 glassine envelopes containing narcotic drugs, “in a bag” and then give them to CASTRO’s “friend,” referring to XAVIER JACKSON, at 418 Fabius Street in City of Syracuse, Onondaga County.

24. On or about January 17, 2023, XAVIER JACKSON traveled to 418 Fabius Street in the City of Syracuse, Onondaga County, to procure narcotic drugs to resell from JOSE COSME.

25. On or about January 18, 2023, JOHNATHAN DELGADO traveled to 418 Fabius Street in the City of Syracuse, Onondaga County, to retrieve narcotic drugs.

26. On or about February 9, 2023, during a series of coded, guarded, and cryptic telephone conversations, SHAWN GIFFORD agreed to meet BAYRON CASTRO at “the mall,” referring to Destiny USA in the City of Syracuse, Onondaga County, to conduct a narcotics transaction.

27. On or about March 7, 2023, in a series of coded, guarded, and cryptic telephone conversations, LAMELL DAVIS agreed to sell one-eighth ounce of cocaine, which he referred to as a “ball,” to another person.

28. On or about March 9, 2023, in a series of coded, guarded and cryptic telephone conversations, LAMELL DAVIS told MICHAEL HUDGINS that he had acquired a “new” supply of “fire,” referring to high-quality narcotics, that he needed “some help” distributing, including packages bearing the stamps “YSL,” “Young Thugs” and “Spider,” as well as “Avengers” and “Playboy,” and MICHAEL HUDGINS ordered “three” of “the best” quality of those supplies from DAVIS, who said they would cost a “straight hundred” dollars each.

29. On or about March 15, 2023, in a coded, guarded, and cryptic telephone conversation, MIGUEL CRUZ agreed to sell “two” quantities of controlled substances to LAMELL DAVIS on Rowland Street in the City of Syracuse, Onondaga County.

30. On or about March 17, 2023, during a series of coded, guarded, and cryptic telephone conversations, MIGUEL CRUZ agreed to distribute “three houses,” meaning three packages, each containing 50-envelopes of a narcotic drug, to another person in the City of Syracuse, Onondaga County.

31. On or about March 24, 2023, during a series of coded, guarded, and cryptic telephone conversations, JEAN CARLOS CRUZ and MIGUEL CRUZ discussed the quantity of narcotics they had sold so far, and MIGUEL CRUZ asked JEAN CARLOS CRUZ to meet him on Shonnard Street in the City of Syracuse, Onondaga County, with the remaining narcotics supply.

32. On or about March 24, 2023, during a series of coded, guarded and cryptic telephone communications, TEVON WEBB asked MIGUEL CRUZ to supply him with narcotics to sell, and MIGUEL CRUZ told WEBB that his “brother,” referring to JEAN CARLOS CRUZ, would deliver the narcotics to WEBB on “Elk” Street in the City of Syracuse, Onondaga County, and WEBB later told MIGUEL CRUZ, “I’m about to give you a band,” meaning \$1,000, for the controlled substances.

33. On or about March 24, 2023, during a series of coded, guarded, and cryptic telephone communications, MIGUEL CRUZ directed JEAN CARLOS CRUZ to “103 elk street” to deliver “25” quantities of narcotics to TEVON WEBB, whom MIGUEL CRUZ identified as “Tay.”

34. On or about March 27, 2023, in a series of coded, guarded, and cryptic telephone conversations, JAMES ODOM agreed to meet SHAWN GIFFORD in the City of Syracuse, Onondaga County, and ODOM then expressed concern that “two cops” were at the meeting location because ODOM was in possession of methamphetamine, which he referred to as “ice.”

35. On or about and between March 29, 2023, and March 30, 2023, MIGUEL CRUZ traveled from Onondaga County to Bronx County, in order to procure narcotic drugs to distribute in Onondaga County.

36. On or about March 30, 2023, TEVON WEBB met MIGUEL CRUZ in the City of Syracuse, Onondaga County, in order to obtain narcotic drugs from CRUZ.

37. On or about March 30, 2023, in a series of coded, guarded, and cryptic telephone conversations, SHAWN GIFFORD agreed to distribute controlled substances to JAMES ODOM in the City of Syracuse, Onondaga County.

38. On or about April 7, 2023, in a series of coded, guarded, and cryptic telephone conversations, MICHAEL HUDGINS agreed to provide LAMELL DAVIS with “powder” cocaine to resell to a customer that DAVIS referred to as “a lick.”

39. On or about April 7, 2023, LAMELL DAVIS sold more than two ounces of cocaine to a person known to the Grand Jury in the Town of Clay, Onondaga County.

40. On or about April 11, 2023, in a series of coded, guarded, and cryptic telephone conversations, TERRAH FREDERICK ordered “four and four”, meaning four quantities of two different narcotic drugs, from LAMELL DAVIS, and they agreed to meet at a Taco Bell restaurant in the Village of Central Square, Oswego County, to conduct the transaction.

41. On or about April 15, 2023, during a series of coded, guarded, and cryptic telephone conversations, TERRAH FREDERICK told LAMELL DAVIS she had “a couple customers” that like a particular type of narcotic drug DAVIS had previously sold her, and then ordered a “variety pack” of “eight” 50-envelope packages of narcotic drugs from LAMELL DAVIS.

42. On or about April 19, 2023, MIGUEL CRUZ possessed thousands of glassine envelopes containing controlled substances fentanyl or a mixture of both fentanyl and heroin with an aggregate weight of more than eight ounces in the Town of Clay, Onondaga County.

43. On or about April 19, 2023, in a series of coded, guarded, and cryptic telephone communications, DAVID KALET ordered “six” quantities of narcotic drugs to resell from JEAN CARLOS CRUZ, and KALET asked that they “all be the same” as the narcotics JEAN CARLOS CRUZ had previously supplied to him, because his customers “loves those.”

44. On or about April 25, 2023, DAVID KALET possessed cocaine and glassine envelopes filled with controlled substances containing a mixture of both fentanyl and heroin in the Town of Geddes, Onondaga County.

45. On or about May 5, 2023, in a series of coded, guarded, and cryptic telephone conversations, BAYRON CASTRO asked JOSE COSME to get him “six little blocks” of narcotic drugs, specifying he wanted “two different ones of each,” and COSME agreed to do so.

46. On or about May 5, 2023, BAYRON CASTRO and JOSE COSME possessed glassine envelopes that contained the narcotic drugs fentanyl and heroin with an aggregate weight of more than eight ounces, in the City of Syracuse, Onondaga County.

47. On or about May 13, 2023, CARLOS TORRES delivered narcotic drugs to JEAN CARLOS CRUZ in the City of Syracuse, Onondaga County.

48. On or about and between May 15, 2023, and May 16, 2023, in a series of coded, guarded, and cryptic telephone communications, DAVID KALET ordered a “half” ounce of “powder” cocaine from JEAN CARLOS CRUZ, and KALET then sent CRUZ’s phone a photograph of the cocaine he received.

49. On or about May 18, 2023, during a series of coded, guarded and cryptic telephone conversations, CARLOS TORRES agreed to distribute “twenty” quantities of narcotic drugs to JEAN CARLOS CRUZ at CRUZ’s residence in the City of Syracuse, Onondaga County.

50. On or about August 6, 2023, LUIS MIGUEL JOAQUIN sold narcotic drugs to another person in Bronx County, New York.

51. On or about August 23, 2023, LUIS MIGUEL JOAQUIN sold thousands of glassine envelopes filled with controlled substances containing a mixture of fentanyl and heroin with an aggregate weight of two ounces or more to another person in Bronx County, New York.

Count Two

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

Said defendant, on or about the 14th day of July, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Three

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

Said defendant, on or about the 14th day of July, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, KEENAN SCOTT, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 14th day of July, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Five

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

Said defendant, on or about the 22nd day of July, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Six

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

Said defendant, on or about the 22nd day of July, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Seven

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

Said defendant, on or about the 11th day of August, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Eight

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

Said defendant, on or about the 11th day of August, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Nine

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

Said defendant, on or about the 11th day of August, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Ten

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

Said defendant, on or about the 11th day of August, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed cocaine, and said cocaine weighed five hundred milligrams or more.

Count Eleven

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

Said defendant, on or about the 11th day of August, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Twelve

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

Said defendant, on or about the 26th day of August, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Thirteen

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

Said defendant, on or about the 26th day of August, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Fourteen

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

Said defendant, on or about the 26th day of August, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Fifteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, KEENAN SCOTT, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 26th day of August, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Sixteen

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

Said defendants, acting in concert, on or about the 13th day of September, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Seventeen

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

Said defendants, acting in concert, on or about the 13th day of September, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Eighteen

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

Said defendant, on or about the 14th day of October, 2022, in the Town of Salina, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Nineteen

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

Said defendant, on or about the 14th day of October, 2022, in the Town of Salina, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Twenty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, KEENAN SCOTT, 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 the 25th day of October, 2022, in the Town of Salina, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing a narcotic drug, to wit: cocaine, and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Twenty-one

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

Said defendant, on or about the 25th day of October, 2022, in the Town of Salina, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Twenty-two

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

Said defendant, on or about the 25th day of October, 2022, in the Town of Salina, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Twenty-three

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

Said defendant, on or about the 25th day of October, 2022, in the Town of Salina, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Twenty-four

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

Said defendant, on or about the 14th day of November, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Twenty-five

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

Said defendant, on or about the 14th day of November, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Twenty-six

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

Said defendant, on or about the 1st day of November, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Twenty-seven

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

Said defendant, on or about the 1st day of November, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Twenty-eight

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

Said defendant, on or about the 1st day of November, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Twenty-nine

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

Said defendant, on or about the 2nd day of November, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Thirty

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

Said defendant, on or about the 2nd day of November, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Thirty-one

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

Said defendants, acting in concert, on or about the 11th day of November, 2022, in the Town of Salina, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Thirty-two

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

Said defendants, acting in concert, on or about the 16th day of November, 2022, in the Town of Van Buren, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Thirty-three

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

Said defendant, on or about the 16th day of November, 2022, in the Town of Van Buren, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Thirty-four

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

Said defendant, on or about the 12th day of December, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Thirty-five

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

Said defendant, on or about the 12th day of December, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Thirty-six

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

Said defendant, on or about the 18th day of December, 2022, in the City of Ogdensburg, St. Lawrence County, knowingly and unlawfully sold a narcotic drug.

Count Thirty-seven

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

Said defendant, on or about the 22nd day of December, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Thirty-eight

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

Said defendant, on or about the 22nd day of December, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Thirty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, KWAMEA JENKINS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.18(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of January, 2023, in the Town of Mexico, Oswego County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count Forty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, KWAMEA JENKINS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of January, 2023, in the Town of Mexico, Oswego County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Forty-one

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

Said defendant, on or about the 9th day of January, 2023, in the Town of Mexico, Oswego County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Forty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, KWAMEA JENKINS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 9th day of January, in the Town of Mexico, Oswego County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Forty-three

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

Said defendant, on or about the 28th day of October, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Forty-four

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

Said defendant, on or about the 28th day of October, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Forty-five

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

Said defendant, on or about the 26th day of December, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Forty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JAIDYN FREEMAN, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 26th day of December, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess a narcotic drug with intent to sell it.

Count Forty-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 16th day of November, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Forty-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JEFFREY WALTS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 16th day of November, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Forty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JEFFREY WALTS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 16th day of November, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Fifty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of December, 2022, in the Town of Hastings, Oswego County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers or salts of isomers and the

preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Fifty-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.18(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of December, 2022, in the Town of Hastings, Oswego County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count Fifty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JEFFREY WALTS, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Sections 110.00 and 220.18(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of December, 2022, in the Town of Hastings, Oswego County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count Fifty-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JEFFREY WALTS, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Sections 110.00 and 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 6th day of December, 2022, in the Town of Hastings, Oswego County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Fifty-four

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

Said defendant, on or about the 20th day of December, 2022, in the Town of Clay, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Fifty-five

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

Said defendant, on or about the 7th day of March, 2023, in the Town of Clay, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Fifty-six

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

Said defendant, on or about the 7th day of March, 2023, in the Town of Clay, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Fifty-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 7th day of March, 2023, in the Town of Clay, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Fifty-eight

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

Said defendant, on or about the 1st day of February, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Fifty-nine

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

Said defendant, on or about the 1st day of February, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Sixty

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

Said defendant, on or about the 26th day of February, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Sixty-one

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

Said defendant, on or about the 26th day of February, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Sixty-two

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

Said defendant, on or about the 2nd day of February, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Sixty-three

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

Said defendant, on or about the 2nd day of February, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Sixty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, 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 the 29th day of March, 2023, in the Town of Clay, Onondaga, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing a narcotic drug, to wit: cocaine, and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Sixty-five

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

Said defendant, on or about the 29th day of March, 2023, in the Town of Clay, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Sixty-six

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

Said defendant, on or about the 29th day of March, 2023, in the Town of Clay, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Sixty-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 29th day of March, 2023, in the Town of Clay, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or

substances, containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Sixty-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 29th day of March, 2023, in the Town of Clay, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Sixty-nine

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

Said defendant, on or about the 7th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Seventy

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, 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 the 7th day of April, 2023, in the Town of Clay, Onondaga County, knowingly and unlawfully sold 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 two ounces or more.

Count Seventy-one

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

Said defendant, on or about the 7th day of April, 2023, in the Town of Clay, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Seventy-two

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

Said defendant, on or about the 7th day of April, 2023, in the Town of Clay, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Seventy-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 16th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances, containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Seventy-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 16th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Seventy-five

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

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

Said defendant, on or about the 11th day of April, 2023, in the Village of Central Square, Oswego County, knowingly and unlawfully sold a narcotic drug.

Count Seventy-six

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

Said defendant, on or about the 11th day of April, 2023, in the Village of Central Square, Oswego County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Seventy-seven

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

Said defendant, on or about the 11th day of April, 2023, in the Village of Central Square, Oswego County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Seventy-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, TERRAH FREDERICK, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 15th day of April, 2023, in the Village of Central Square, Oswego County, knowingly and unlawfully attempted to possess a narcotic drug with intent to sell it.

Count Seventy-nine

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

Said defendant, on or about the 23rd day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Eighty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 23rd day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Eighty-one

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

SUBSTANCE IN THE THIRD DEGREE in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 23rd day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Eighty-two

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

Said defendant, on or about the 23rd day of May, 2023, in the City of Syracuse, Onondaga County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purpose of unlawfully manufacturing, packaging or dispensing of any narcotic drug or stimulant.

Count Eighty-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 23rd day of May, 2023, in the City of Syracuse, Onondaga

County, knowingly possessed a loaded firearm, to wit: a loaded Glock 17 9mm semi-automatic pistol bearing serial number BTZR748.

The subject matter of this count is an Armed Felony as that term is defined in Section 1.20 of the Criminal Procedure Law.

Count Eighty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 23rd day of May, 2023, in the City of Syracuse, Onondaga County, knowingly possessed a firearm, to wit: a Glock 17 9mm semi-automatic pistol.

Count Eighty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 23rd day of May, 2023, in the City of Syracuse, Onondaga County, knowingly possessed a large capacity ammunition feeding device to wit: a magazine that has a capacity of more than ten rounds of ammunition.

Count Eighty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **CRIMINAL POSSESSION OF A FIREARM** in violation of Section 265.01-b(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 23rd day of May, 2023, in the City of Syracuse, Onondaga County, knowingly possessed a firearm, to wit: a Glock 17 9mm semi-automatic pistol.

Count Eighty-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **CRIMINAL MISCHIEF IN THE SECOND DEGREE** in violation of Section 145.10 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 23rd day of May, 2023, in the Town of Clay, Onondaga County, with intent to damage property of another person, and having no right to do so nor any reasonable ground to believe that he has such right, damaged property of another person in an amount exceeding one thousand five hundred dollars, to wit: defendant, having no right to do so, intentionally damaged property of the Syracuse Police Department consisting of two Syracuse Police vehicles, a 2017 Ford Explorer and a 2012 Ford Expedition, in the amounts of \$3,975.61 and \$1,448.72, respectively, said damage totaling \$5,424.33.

Count Eighty-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **OBSTRUCTING GOVERNMENTAL ADMINISTRATION IN THE SECOND DEGREE** in violation of Section 195.05 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 23rd day of May, 2023, in the Town of Clay, Onondaga County, intentionally obstructed, impaired or perverted the administration of law or other governmental function or prevented or attempted to prevent a public servant from performing an official function, by means of intimidation, physical force or interference, or by means of any independently unlawful act, to wit: the defendant, knowing that he had been directed to stop his motor vehicle by police, refused to stop and attempted to flee such officers by damaging two Syracuse Police vehicles and by driving at speeds which equaled or exceeded twenty-five miles per hour above the speed limit or engaging in reckless driving, such acts constituting the unlawful act of unlawful fleeing a police officer in a motor vehicle in the third degree.

Count Eighty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LAMELL DAVIS, of the crime of **UNLAWFUL FLEEING A POLICE OFFICER IN A MOTOR VEHICLE IN THE THIRD DEGREE** in violation of Section 270.25 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 23rd day of May, 2023, in the Town of Clay, Onondaga County, knowing that he had been directed to stop his motor vehicle by a uniformed police officer or a marked police vehicle by the activation of either the lights or the lights and siren of such vehicle, he thereafter attempted to flee such officer or such vehicle by driving at speeds which equaled or exceeded twenty-five miles per hour above the speed limit or engaged in reckless driving as defined by section twelve hundred and twelve of the vehicle and traffic law.

Count Ninety

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, BAYRON CASTRO and JOHNATHAN DELGADO, of the crime of **CRIMINAL**

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

Said defendants, acting in concert, on or about the 11th day of January, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Ninety-one

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

Said defendant, on or about the 14th day of January, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Ninety-two

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

Said defendant, on or about the 15th day of January, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Ninety-three

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

Said defendants, acting in concert, on or about the 16th day of January, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Ninety-four

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

Said defendant, on or about the 16th day of January, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Ninety-five

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

Said defendants, acting in concert, on or about the 17th day of January, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Ninety-six

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

Said defendant, on or about the 17th day of January, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Ninety-seven

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

Said defendant, on or about the 17th day of January, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Ninety-eight

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

Said defendant, on or about the 9th day of February, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Ninety-nine

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

Said defendant, on or about the 9th day of February, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred

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

Said defendant, on or about the 18th day of February, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count One hundred one

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

Said defendants, acting in concert, on or about the 17th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred two

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

Said defendant, on or about the 17th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred three

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

Said defendants, acting in concert, on or about the 24th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred four

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

Said defendants, acting in concert, on or about the 24th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred five

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

Said defendant, on or about the 24th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred six

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

Said defendant, on or about the 30th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred seven

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

Said defendant, on or about the 30th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred eight

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

Said defendant, on or about the 30th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred nine

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

Said defendant, on or about the 30th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred ten

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

Said defendant, on or about the 30th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred eleven

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

Said defendant, on or about the 31st day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred twelve

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, MIGUEL CRUZ, 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 the 19th day of April, 2023, in the Town of Clay, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

Count One hundred thirteen

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

Said defendant, on or about the 19th day of April, 2023, in the Town of Clay, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred fourteen

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

Said defendant, on or about the 27th day of April, 2023, in the Town of Clay, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred fifteen

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

Said defendant, on or about the 27th day of April, 2023, in the Town of Clay, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more

Count One hundred sixteen

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

Said defendant, on or about the 19th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred seventeen

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

Said defendant, on or about the 19th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count One hundred eighteen

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

Said defendant, on or about the 19th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred nineteen

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

Said defendant, on or about the 25th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred twenty

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

Said defendant, on or about the 25th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count One hundred twenty-one

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

Said defendant, on or about the 25th day of April, 2023, in the Town of Geddes, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred twenty-two

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

Said defendants, acting in concert, on or about the 27th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred twenty-three

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

Said defendants, acting in concert, on or about the 27th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred twenty-four

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

Said defendants, acting in concert, on or about and between the 29th day of April, 2023, and the 30th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred twenty-five

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

Said defendants, acting in concert, on or about 30th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred twenty-six

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

Said defendant, on or about the 5th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred twenty-seven

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendants, BAYRON CASTRO and JOSE COSME, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of Section 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, acting in concert, on or about the 5th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

Count One hundred twenty-eight

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

Said defendants, acting in concert, on or about the 5th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred twenty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSE COSME, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 5th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly possessed a large capacity ammunition feeding device, to wit: a magazine that has a capacity of more than ten rounds of ammunition.

Count One hundred thirty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JOSE COSME, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(8) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 5th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly possessed a large capacity ammunition feeding device, to wit: a magazine that has a capacity of more than ten rounds of ammunition.

Count One hundred thirty-one

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

Said defendants, acting in concert, on or about the 13th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred thirty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, CARLOS 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 the 13th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred thirty-three

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

Said defendant, on or about the 13th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred thirty-four

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

Said defendants, acting in concert, on or about the 14th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred thirty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, JEAN CARLOS CRUZ, 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 the 16th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or

substances containing a narcotic drug, to wit: cocaine, and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count One hundred thirty-six

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

Said defendant, on or about the 16th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count One hundred thirty-seven

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

Said defendant, on or about the 16th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count One hundred thirty-eight

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

Said defendant, on or about the 18th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred thirty-nine

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

Said defendant, on or about the 24th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred forty

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

Said defendants, acting in concert, on or about the 24th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count One hundred forty-one

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

Said defendant, on or about the 25th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred forty-two

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

Said defendant, on or about the 25th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count One hundred forty-three

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

Said defendant, on or about the 25th day of May, 2023, in the City of Syracuse, Onondaga County, knowingly possessed a rifle, to wit: a Ruger 10/22 Carbine, 22 Long Rifle caliber semiautomatic rifle.

Count One hundred forty-four

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS MIGUEL JOAQUIN, 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 the 6th day of August, 2023, in Bronx County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count One hundred forty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS MIGUEL JOAQUIN, 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 the 23rd day of August, 2023, in Bronx County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count One hundred forty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, LUIS MIGUEL JOAQUIN, 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 the 23rd day of August, 2023, in Bronx County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

Count One hundred forty-seven

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

Said defendant, on or about the 23rd day of August, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count One hundred forty-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, BAYRON CASTRO, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE** in violation of Sections 110.00 and 220.21(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 23rd day of August, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

Count One hundred forty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, BAYRON CASTRO, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 23rd day of August, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess a narcotic drug with intent to sell it.

Count One hundred fifty

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

Said defendant, from on or about January 1, 2023, through on or about May 31, 2023, in the City of Syracuse, Onondaga County, and elsewhere, as a profiteer, knowingly and unlawfully possessed, on one or more occasions within six months or less, a narcotic drug with intent to sell the same, and such narcotic drugs had a total aggregate value of seventy-five thousand dollars or more.

Dated: October 24, 2023
Syracuse, New York

NICOLE KEARY
Deputy Attorney General
Organized Crime Task Force

By:

GEOFFREY J. CIERECK
Assistant Deputy Attorney General
Organized Crime Task Force
300 South State Street, Suite 300
Syracuse, NY 13202

GRAND JURY FOREPERSON
Dated: October 24, 2023

STATE OF NEW YORK
COUNTY OF ONONDAGA

COUNTY COURT

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

-against-

DEION BRADLEY
MALIK EVANS, a/k/a "Leak"
CHAD FIRENZE
BRYCEDON JAMES, a/k/a "Doodak"
EMANUEL JENKINS, a/k/a "Lean"
DOCCIANA MACK
EDWARD PETTIFORD, a/k/a "Buster"
HENRY TOWNSEND, a/k/a "Rock," a/k/a "Henrock"

SEALED
INDICTMENT
Indict No. 2023-0640 (1 - 8)

Index No. 2023-11404

OCTF 22-012S

Defendants.

-----X

Count One

THE GRAND JURY OF ONONDAGA COUNTY, by this indictment, accuses the defendants, DEION BRADLEY, MALIK EVANS, a/k/a "Leak" (hereinafter "Malik Evans"), CHAD FIRENZE, BRYCEDON JAMES, a/k/a "Doodak" (hereinafter "Brycedon James"), DOCCIANA MACK, EDWARD PETTIFORD, a/k/a "Buster" (hereinafter "Edward Pettiford"), and HENRY TOWNSEND, a/k/a "Rock," a/k/a "Henrock" (hereinafter "Henry Townsend") 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 September 22, 2022, through on or about May 22, 2023, in Onondaga County and Oswego County, in the State of New York and elsewhere, with intent that conduct constituting the crime of Criminal Sale of a Controlled Substance in the Second Degree, said crime being a Class A felony, be committed, the defendants knowingly and intentionally agreed with each other and with others, known and unknown, to engage in or cause the performance of such conduct.

PREAMBLE

It was part of this conspiracy to sell narcotics and methamphetamine in amounts of one-half ounce or more in Onondaga County and Oswego County, in the State of New York and elsewhere.

It was also part of this conspiracy for EDWARD PETTIFORD to sell narcotic drugs and/or methamphetamine to DEION BRADLEY, BRYCEDON JAMES, DOCCIANA MACK, HENRY TOWNSEND, and others.

It was also part of this conspiracy for DEION BRADLEY to obtain methamphetamine and other controlled substances from EDWARD PETTIFORD to sell to others.

It was also part of this conspiracy for HENRY TOWNSEND to sell narcotic drugs to MALIK EVANS and others and to sell methamphetamine to others.

It was also part of this conspiracy for BRYCEDON JAMES to work in conjunction with HENRY TOWNSEND to sell narcotic drugs to others.

It was also part of this conspiracy for MALIK EVANS to obtain narcotic drugs from HENRY TOWNSEND to sell to CHAD FIRENZE and others.

It was also part of this conspiracy for CHAD FIRENZE and DOCCIANA MACK to sell narcotic drugs to others.

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

OVERT ACTS

In the furtherance of the conspiracy and to affect the objects thereof, from on or before September 22, 2022, through on or about May 22, 2023, the following overt acts, among others, were committed:

1. On or about September 22, 2022, MALIK EVANS sold narcotic drugs to another person in the City of Oswego, Oswego County.

2. On or about October 14, 2022, in a series of coded, guarded, and cryptic telephone communications, MALIK EVANS agreed to travel to Oswego County to distribute “4” quantities of narcotic drugs to another person.

3. On or about November 29, 2022, CHAD FIRENZE possessed numerous glassine envelopes filled with controlled substances containing a mixture of both fentanyl and heroin to resell in the City of Fulton, Oswego County.

4. On or about November 30, 2022, in a series of coded, guarded, and cryptic telephone communications, CHAD FIRENZE ordered narcotic drugs from MALIK EVANS and told Evans that a female would travel to EVANS to procure them “right now,” because FIRENZE had customers “lined up at my door” to purchase them.

5. On or about February 26, 2023, in a series of coded, guarded, and cryptic telephone conversations, HENRY TOWNSEND asked BRYCEDON JAMES to supply him with “one house,” referring to a package containing 50-envelopes of a narcotic drug, to sell to his customers, whom TOWNSEND referred to as “my people.”

6. On or about March 3, 2023, in a series of coded, guarded, and cryptic telephone conversations, MALIK EVANS ordered “12” quantities of narcotic drugs bearing the “Rolex” stamp from HENRY TOWNSEND, and they agreed to meet on “Valley” Drive in the City of Syracuse, Onondaga County, to conduct the transaction.

7. On or about March 17, 2023, during a coded, guarded, and cryptic telephone communication, DOCCIANA MACK requested that EDWARD PETTIFORD sell her cocaine, which MACK referred to as “hardware,” and they agreed to meet in “the projects” in the City of Syracuse, Onondaga County, to conduct the transaction.

8. On or about March 28, 2023, HENRY TOWNSEND possessed controlled substances containing methamphetamine with an aggregate weight of two ounces or more, as well

as cocaine with an aggregate weight of one-eighth ounce or more, in the City of Syracuse, Onondaga County.

9. On or about April 6, 2023, in a series of coded, guarded, and cryptic telephone conversations, BRYCEDON JAMES ordered “eleven” quantities of narcotic drugs from EDWARD PETTIFORD to distribute to “Leak,” referring to MALIK EVANS.

10. On or about April 20, 2023, during a coded, guarded, and cryptic telephone conversation, DEION BRADLEY ordered methamphetamine, which BRADLEY referred to as “ice cream,” from EDWARD PETTIFORD, to sell his customers, whom BRADLEY referred to as “my peoples.”

11. On or about April 22, 2023, in a coded, guarded, and cryptic telephone conversation, EDWARD PETTIFORD agreed to sell an ounce of methamphetamine to BRYCEDON JAMES, who had requested “a little zipper of ice cream.”

12. On or about May 1, 2023, during a coded, guarded, and cryptic telephone conversation, DEION BRADLEY ordered a “half ounce” of methamphetamine from EDWARD PETTIFORD, and PETTIFORD agreed to deliver it to BRADLEY at his residence in the City of Syracuse, Onondaga County.

13. On or about May 22, 2023, DOCCIANA MACK possessed cocaine weighing one-eighth ounce or more in the City of Syracuse, Onondaga County.

Count Two

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

Said defendant, on or about the 22nd day of September, 2022, in the City of Oswego, Oswego County, knowingly and unlawfully sold a narcotic drug.

Count Three

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

Said defendant, on or about the 14th day of October, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Four

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

Said defendant, on or about the 14th day of October, 2022, in the Town of Granby, Oswego County, knowingly and unlawfully sold a narcotic drug.

Count Five

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

Said defendant, on or about the 6th day of November, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Six

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

Said defendant, on or about the 29th day of November, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Seven

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

Said defendant, on or about the 29th day of November, 2022, in the City of Fulton, Oswego County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Eight

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

Said defendant, on or about the 30th day of November, 2022, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Nine

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

Said defendant, on or about the 30th day of November, 2022, in the City of Fulton, Oswego County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Ten

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

Said defendant, on or about the 3rd day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Eleven

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

Said defendant, on or about the 3rd day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Twelve

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

Said defendant, on or about the 6th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Thirteen

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

Said defendant, on or about the 6th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Fourteen

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

Said defendant, on or about the 6th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Fifteen

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

Said defendant, on or about the 16th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug.

Count Sixteen

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

Said defendant, on or about the 16th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug with intent to sell it.

Count Seventeen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EDWARD PETTIFORD, 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 the 21st day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and the preparations, compounds, mixtures or substances are of an aggregate weight of one-half ounce or more.

Count Eighteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, BRYCEDON JAMES, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 21st day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine, with intent to sell it.

Count Nineteen

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, BRYCEDON JAMES, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Sections 110.00 and 220.16(12) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 21st day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Twenty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EDWARD PETTIFORD, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE** in violation of Section 220.41(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 22nd day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or

substances containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

Count Twenty-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, BRYCEDON JAMES, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 22nd day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Twenty-two

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

Said defendant, on or about the 9th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Twenty-three

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

Said defendant, on or about the 9th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Twenty-four

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

Said defendant, on or about the 9th day of April, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Twenty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EDWARD PETTIFORD, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.39(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1st day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and the preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Twenty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DEION BRADLEY, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Sections 110.00 and 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 1st day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Twenty-seven

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

Said defendant, on or about the 22nd day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

Count Twenty-eight

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

Said defendant, on or about the 22nd day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Twenty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EDWARD PETTIFORD, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 22nd day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Thirty

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

Said defendant, on or about the 22nd day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Thirty-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, DOCCIANA MACK, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 22nd day of May, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Thirty-two

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

SUBSTANCE IN THE SECOND DEGREE in violation of Section 220.18(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 28th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

Count Thirty-three

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, HENRY TOWNSEND, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** in violation of Section 220.16(7) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 28th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing methamphetamine, its salts, isomers or salts of isomers with intent to sell it and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Thirty-four

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

Said defendant, on or about the 28th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with intent to sell it.

Count Thirty-five

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, HENRY TOWNSEND, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE** in violation of Section 220.09(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 28th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

Count Thirty-six

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, EMANUEL JENKINS, of the crime of **TAMPERING WITH PHYSICAL EVIDENCE** in violation of Section 215.40(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 28th day of March, 2023, in the City of Syracuse, Onondaga County, believing that certain physical evidence was about to be produced or used in an official proceeding or a prospective official proceeding, and intending to prevent such production or use, he suppressed it by any act of concealment, alteration or destruction, or by employing force, intimidation or deception against any person, to wit: defendant, believing that certain physical evidence was about to be produced or used in an official or prospective official police investigation and prosecution, did intentionally recover and conceal spent .40 caliber shell casings, and intentionally concealed his clothing by changing into different clothing, prior to police responding to a shooting incident, in order to prevent such production or use of said evidence.

Count Thirty-seven

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

Said defendant, on or about the 28th day of March, 2023, in the City of Syracuse, Onondaga County, with intent to cause physical injury to another person, he causes such injury to such person or to a third person by means of a deadly weapon or dangerous instrument.

Count Thirty-eight

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, HENRY TOWNSEND, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(1)(b) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 28th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly possessed a loaded firearm with intent to use the same unlawfully against another.

The subject matter of this count is an Armed Felony as that term is defined in Section 1.20 of the Criminal Procedure Law.

Count Thirty-nine

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, HENRY TOWNSEND, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** in violation of Section 265.03(3) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 28th day of March, 2023, in the City of Syracuse, Onondaga County, knowingly possessed a loaded firearm, to wit: a pistol, and such possession took place

outside the defendant's home or place of business.

The subject matter of this count is an Armed Felony as that term is defined in Section 1.20 of the Criminal Procedure Law.

Count Forty

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, HENRY TOWNSEND, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE** in violation of Section 265.02(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 28th day of March, 2023, in the City of Syracuse, Onondaga County, did possess a firearm, to wit: a pistol.

Count Forty-one

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, HENRY TOWNSEND, of the crime of **RECKLESS ENDANGERMENT IN THE FIRST DEGREE** in violation of Section 120.25 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 28th day of March, 2023, in the City of Syracuse, Onondaga County, under circumstances evincing a depraved indifference to human life, he recklessly engaged in conduct which created a grave risk of death to another person, to wit: by repeatedly firing a pistol in the direction of West Newell Street at a moving vehicle on a busy street with vehicular traffic and pedestrians present, one of whom was struck by gunfire and injured.

Count Forty-two

AND THE AFORESAID GRAND JURY by this indictment further accuses the defendant, HENRY TOWNSEND, of the crime of **TAMPERING WITH PHYSICAL EVIDENCE** in violation of Section 215.40(2) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about the 28th day of March, 2023, in the City of Syracuse, Onondaga County, believing that certain physical evidence was about to be produced or used in an official proceeding or a prospective official proceeding, and intending to prevent such production or use, he suppressed it by any act of concealment, alteration or destruction, or by employing force, intimidation or deception against any person, to wit: defendant, believing that physical evidence was about to be produced or used in an official or prospective official proceeding and intending to prevent the production of a pistol in such police investigation of a shooting incident, did suppress it by concealment and/or destruction.

Dated: October 24, 2023
Syracuse, New York

NICOLE KEARY
Deputy Attorney General
Organized Crime Task Force

By:

GEOFFREY J. CIERECK
Assistant Deputy Attorney General
Organized Crime Task Force
300 South State Street, Suite 300
Syracuse, NY 13202

GRAND JURY FOREPERSON
Dated: October 24, 2023