

STATE OF NEW YORK  
COUNTY COURT: COUNTY OF SARATOGA

-----X

THE PEOPLE OF THE STATE OF NEW YORK

-vs-

SEALED INDICTMENT

Indictment #

ALEXANDER BAYNE, a/k/a “LUCKY”, a/k/a “PHAT BOY”,  
CONRAD BAYNE,  
ZACHARY BESSETTE,  
KEVIN COOPER,  
TREVOR HARRIS,  
RONNIE LUNA, a/k/a “JADA”,  
LINDSEY MATTISON,  
RYAN MEGNA,  
JERMAINE MORENO,  
JACK MOULTON,  
CASSIDY O’CONNELL,  
WESLEY REED JR.,  
WESLEY REED III,  
CHRISTINE SONDERMEYER,  
MELISSA STEARNS,  
LONSDALE STUFFLE, a/k/a “L-BOOGIE”,  
MACKENZIE SUMNER,  
HEATHER THOMPSON, a/k/a “HEAVY”,  
JACKSON TUCKER,  
CHRISTOPHER WERN, and  
WALTER WINCHELL.

Defendants.

-----X

COUNT 1

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, accuses the defendants, ALEXANDER BAYNE, a/k/a “LUCKY,” a/k/a “PHAT BOY” (hereinafter ALEXANDER BAYNE”), CONRAD BAYNE, ZACHARY BESSETTE, KEVIN COOPER, TREVOR HARRIS, RONNIE LUNA, a/k/a “JADA” (hereinafter “RONNIE LUNA”), LINDSEY MATTISON, RYAN MEGNA, JERMAINE MORENO, JACK MOULTON, CASSIDY O’CONNELL, WESLEY REED JR., WESLEY REED III, CHRISTINE SONDERMEYER,

MELISSA STEARNS, LONSDALE STUFFLE, a/k/a “L-BOOGIE” (hereinafter “LONSDALE STUFFLE”), MACKENZIE SUMNER, HEATHER THOMPSON, a/k/a “HEAVY” (hereinafter “HEATHER THOMPSON”), JACKSON TUCKER, CHRISTOPHER WERN, and WALTER WINCHELL, 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:

That the said defendants, in Saratoga County, Albany County, Orange County, Rensselaer County, Warren County, Washington County, Westchester County, and elsewhere in the State of New York, from on or before November 13, 2023, until on or about May 21, 2024, with intent that conduct constituting the crimes 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, and/or 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, and/or 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, said crimes being class A felonies, be committed, did knowingly and unlawfully agree with each other and with others, known and unknown, to engage in and cause the performance of such conduct as would constitute any one or more of the above-mentioned class A felonies.

### **PREAMBLE**

It was the purpose of this conspiracy to sell narcotics in amounts in excess of one-half ounce and/or possess narcotics in amounts of eight ounces or more, in Saratoga County, Albany County, Orange County, Rensselaer County, Warren County, Washington County, Westchester County, and elsewhere, and to collect the proceeds from those narcotics transactions.

It was part of this conspiracy for JERMAINE MORENO to supply cocaine to HEATHER THOMPSON for distribution to others.

It was part of this conspiracy for HEATHER THOMPSON to distribute cocaine to ALEXANDER BAYNE, CONRAD BAYNE, TREVOR HARRIS, RONNIE LUNA, WESLEY REED, JR., WESLEY REED III, LONSDALE STUFFLE, MACKENZIE SUMNER, CHRISTOPHER WERN, and others.

It was also part of this conspiracy for ALEXANDER BAYNE to supply cocaine to CONRAD BAYNE, TREVOR HARRIS, LINDSEY MATTISON, RYAN MEGNA, MELISSA STERNS, JACKSON TUCKER, and others.

It was also part of this conspiracy for ALEXANDER BAYNE and TREVOR HARRIS to work together to sell cocaine and fentanyl to others.

It was also part of this conspiracy for RONNIE LUNA to sell cocaine to ZACHARY BESSETTE, JACK MOULTON, and others.

It was also part of this conspiracy for LONSDALE STUFFLE to sell cocaine to KEVIN COOPER, CASSIDY O'CONNELL, CHRISTINE SONDERMEYER, WALTER WINCHELL, and others.

It was part of this conspiracy for CONRAD BAYNE, ZACHARY BESSETTE, TREVOR HARRIS, LINDSEY MATTISON, RYAN MEGNA, JACK MOULTON, CASSIDY O'CONNELL, WESLEY REED, JR., WESLEY REED III, MELISSA STERNS, CHRISTINE SONDERMEYER, MACKENZIE SUMNER, JACKSON TUCKER, CHRISTOPHER WERN, WALTER WINCHELL, to sell cocaine.

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 furtherance of the conspiracy, and to effect the objects thereof, from on or before November 13, 2023, until on or about May 21, 2024, the following overt acts, **among others**, were committed:

1. On or about February 1, 2024, in a coded, guarded and cryptic telephone communication, HEATHER THOMPSON, agreed to sell quantities of both powder and crack cocaine to ALEXANDER BAYNE, which BAYNE referred to as “six soft” and “fourteen hard”, respectively.

2. On or about February 14, 2024, in a series of coded, guarded and cryptic telephone communications, RONNIE LUNA requested that HEATHER THOMPSON sell him 50 grams of cocaine, and THOMPSON agreed.

3. On or about February 16, 2024, in a series of coded, guarded and cryptic telephone communications, ALEXANDER BAYNE and JACKSON TUCKER discussed the sale of two grams of cocaine, which BAYNE referred to as “two gz”, to one of TUCKER’s customers.

4. On or about February 23, 2024, in a series of coded, guarded and cryptic telephone communications, HEATHER THOMPSON agreed to sell twenty grams of cocaine to CHRISTOPHER WERN who requested that HEATHER THOMPSON sell him twenty grams of cocaine.

5. On or about February 29, 2024, in a series of coded, guarded and cryptic telephone communications, RYAN MEGNA asked ALEXANDER BAYNE to supply him with “a game of pool”, which was a cryptic reference to one-eighth ounce of cocaine, and BAYNE agreed.

6. On or about March 2, 2024, in a series of coded, guarded and cryptic telephone communications, KEVIN COOPER agreed to provide cocaine to LONSDALE STUFFLE.

7. On or about March 4, 2024, in a series of coded, guarded and cryptic telephone communications, WESLEY REED JR. requested that HEATHER THOMPSON sell him one-half ounce of cocaine, which REED JR. referred to as “fourteen dollars”, and THOMPSON agreed.

8. On or about March 5, 2024, in a series of coded, guarded and cryptic telephone communications, MELISSA STEARNS asked ALEXANDER BAYNE to supply her with crack cocaine, which STEARNS referred to as “hard”, and BAYNE agreed.

9. On or about March 6, 2024, in a series of coded, guarded and cryptic telephone communications, JACKSON TUCKER requested that ALEXANDER BAYNE sell him “three-point-five” grams of cocaine, and BAYNE agreed.

10. On or about March 16, 2024, in a series of coded, guarded and cryptic telephone communications, ZACHARY BESSETTE asked RONNIE LUNA to sell him one-eighth ounce of cocaine, which BESSETTE referred to as “another B”, and LUNA agreed.

11. On or about March 18, 2024, in a series of coded, guarded and cryptic telephone communications, ALEXANDER BAYNE and TREVOR HARRIS discussed the sale of one-eighth ounce of powder cocaine, which HARRIS referred to as “a bizzy of the girl”, to a narcotics customer of HARRIS.

12. On or about March 18, 2024, in a series of coded, guarded and cryptic telephone communications, CHRISTINE SONDERMEYER requested that LONSDALE STUFFLE sell her one-eighth ounce of crack cocaine, which SONDERMEYER referred to as a “game” of “hard boiled”, and STUFFLE agreed.

13. On March 20, 2024, in a coded, guarded and cryptic telephone communication, WALTER WINCHELL asked LONSDALE STUFFLE to sell him crack cocaine, which STUFFLE referred to as “already done”, and STUFFLE agreed.

14. On or about March 21, 2024, in a series of coded, guarded and cryptic telephone communications, CASSIDY O'CONNELL and LONSDALE STUFFLE discussed the sale of one-eighth ounce of cocaine, which they referred to as a "ball", to O'CONNELL's customer.

15. On or about March 27, 2024, in a series of coded, guarded and cryptic telephone communications, WESLEY REED III requested that HEATHER THOMPSON sell him an ounce of cocaine and an additional 5 grams of cocaine, which REED III referred to as "one onion and just the five", and THOMPSON agreed.

16. On or about April 1, 2024, in a series of coded, guarded and cryptic telephone communications, MACKENZIE SUMNER offered to provide HEATHER THOMPSON with \$650-worth of food stamps in exchange for cocaine, and THOMPSON agreed to sell "7" grams of cocaine to SUMNER for that quantity of food stamps.

17. On or about April 2, 2024, in a series of coded, guarded and cryptic telephone communications, CONRAD BAYNE asked HEATHER THOMPSON to sell him one-eighth ounce of cocaine, which BAYNE referred to as "a baseball", and THOMPSON agreed.

18. On or about April 12, 2024, through a series of coded, guarded and cryptic telephone communications, JERMAINE MORENO sold more than one-half ounce of cocaine to HEATHER THOMPSON.

19. On or about April 16, 2024, in a series of coded, guarded and cryptic telephone communications, JACK MOULTON requested that RONNIE LUNA supply him with one-eighth ounce of cocaine, which MOULTON referred to as "a ball", and LUNA agreed.

20. On or about April 23, 2024, JACK MOULTON possessed approximately one-quarter ounce of cocaine in Warren County.

21. On or about April 26, 2024, in a series of coded, guarded and cryptic telephone communications, LINDSAY MATTISON asked ALEXANDER BAYNE to sell her one-eighth ounce of crack cocaine, which MATTISON referred to as a “ball of hard”, and BAYNE agreed.

22. On or about May 2, 2024, JERMAINE MORENO possessed more than eight ounces of cocaine in Albany County.

23. On or about May 15, 2024, LONSDALE STUFFLE met HEATHER THOMPSON at a residence in Saratoga County in order to obtain cocaine from THOMPSON.

24. On or about May 15, 2024, LONSDALE STUFFLE possessed more than one-half ounce of cocaine in Warren County.

25. On or about May 15, 2024, HEATHER THOMPSON possessed more than one-half ounce of cocaine in Warren County.

### COUNT 2

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Rensselaer, State of New York, on or about February 1, 2024, did knowingly and unlawfully sell 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 3

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of ATTEMPTED

CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Rensselaer, State of New York, on or about February 1, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 4

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Rensselaer, State of New York, on or about February 1, 2024, did knowingly and unlawfully attempt 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 5

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Saratoga, State of New York, on or about February 16, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.



COUNT 6

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CONRAD BAYNE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CONRAD BAYNE, in the County of Saratoga, State of New York, on or about February 16, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 7

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CONRAD BAYNE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CONRAD BAYNE, in the County of Saratoga, State of New York, on or about February 16, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 8

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Rensselaer, State of

New York, on or about February 17, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 9

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Warren, State of New York, on or about February 14, 2024, did knowingly and unlawfully sell 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 10

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about February 16, 2024, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 11

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about February 16, 2024, did knowingly and unlawfully 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 12

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JERMAINE MORENO, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, in violation of Section 220.21 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JERMAINE MORENO, in the County of Albany, State of New York, on or about May 2, 2024, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing the narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

COUNT 13

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JERMAINE MORENO, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JERMAINE MORENO, in the County of Albany, State of New York, on or about May 2, 2024, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 14

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTOPHER WERN, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTOPHER WERN, in the County of Saratoga, State of New York, on or about February 10, 2024, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 15

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTOPHER WERN, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTOPHER WERN, in the County of Saratoga, State of New York, on or about February 10, 2024, did knowingly and unlawfully 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 16

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Warren, State of New York, on or about February 23, 2024, did knowingly and unlawfully sell 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 17

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTOPHER WERN, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTOPHER WERN, in the County of Warren, State of New York, on or about February 23, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 18

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTOPHER WERN, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTOPHER WERN, in the County of Warren, State of New York, on or about February 23, 2024, did knowingly and unlawfully attempt 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 19

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE

OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Saratoga, State of New York, on or about February 24, 2024, did knowingly and unlawfully sell 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 20

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Saratoga, State of New York, on or about February 24, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 21

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Saratoga, State of New York, on or about February 24, 2024, did knowingly and unlawfully attempt 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 22

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Rensselaer, State of New York, on or about March 4, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 23

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WESLEY REED, JR., of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WESLEY REED, JR., in the County of Rensselaer, State of New York, on or about March 4, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 24

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WESLEY REED, JR., of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WESLEY REED, JR., in the County of Rensselaer, State of New York, on or about March 4, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 25

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, in violation of Sections 110.00 and 220.21 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Rensselaer, State of New York, on or about March 16, 2024, did knowingly and unlawfully attempt to possess 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 eight ounces or more.

COUNT 26

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Rensselaer, State of New York, on or about March 16, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.



COUNT 27

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Rensselaer, State of New York, on or about March 18, 2024, did knowingly and unlawfully sell 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 28

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WESLEY REED III, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WESLEY REED III, in the County of Rensselaer, State of New York, on or about March 18, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 29

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WESLEY REED III, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WESLEY REED III, in the County of Rensselaer, State of New

York, on or about March 18, 2024, did knowingly and unlawfully attempt 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 30

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Rensselaer, State of New York, on or about March 19, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 31

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WESLEY REED, JR., of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WESLEY REED, JR., in the County of Rensselaer, State of New York, on or about March 19, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 32

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WESLEY REED, JR., of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE,

in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WESLEY REED, JR., in the County of Rensselaer, State of New York, on or about March 19, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 33

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, in violation of Section 220.43 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Rensselaer, State of New York, on or about March 21, 2024, did knowingly and unlawfully sell 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 two ounces or more.

COUNT 34

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WESLEY REED, JR., of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WESLEY REED, JR., in the County of Rensselaer, State of New York, on or about March 21, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 35

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WESLEY REED, JR., of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WESLEY REED, JR., in the County of Rensselaer, State of New York, on or about March 21, 2024, did knowingly and unlawfully attempt 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 36

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Rensselaer, State of New York, on or about March 22, 2024, did knowingly and unlawfully sell 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 37

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WESLEY REED, JR., of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in

violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WESLEY REED, JR., in the County of Rensselaer, State of New York, on or about March 22, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 38

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WESLEY REED, JR., of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WESLEY REED, JR., in the County of Rensselaer, State of New York, on or about March 22, 2024, did knowingly and unlawfully attempt 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 39

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Rensselaer, State of New York, on or about March 25, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 40

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WESLEY REED III, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WESLEY REED III, in the County of Rensselaer, State of New York, on or about March 25, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 41

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WESLEY REED III, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WESLEY REED III, in the County of Rensselaer, State of New York, on or about March 25, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 42

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Rensselaer, State of

New York, on or about March 27, 2024, did knowingly and unlawfully sell 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 43

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WESLEY REED, III., of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WESLEY REED, III., in the County of Rensselaer, State of New York, on or about March 27, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 44

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WESLEY REED, III., of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WESLEY REED, III., in the County of Rensselaer, State of New York, on or about March 27, 2024, did knowingly and unlawfully attempt 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 45

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, in violation of Section 220.43 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Rensselaer, State of New York, on or about March 28, 2024, did knowingly and unlawfully sell 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 two ounces or more.

COUNT 46

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Saratoga, State of New York, on or about April 2, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 47

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CONRAD BAYNE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CONRAD BAYNE, in the County of Saratoga, State of New York, on or about April 2, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit:



cocaine, with intent to sell it.

COUNT 48

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CONRAD BAYNE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CONRAD BAYNE, in the County of Saratoga, State of New York, on or about April 2, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 49

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Albany, State of New York, on or about April 3, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 50

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Warren, State of New

York, on or about April 1, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 51

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Warren, State of New York, on or about April 1, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 52

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Warren, State of New York, on or about April 1, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 53

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39

(Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Saratoga, State of New York, on or about April 3, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 54

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Saratoga, State of New York, on or about April 3, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 55

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Saratoga, State of New York, on or about April 3, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 56

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Saratoga, State of New York, on or about April 4, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 57

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Saratoga, State of New York, on or about April 4, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 58

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Saratoga, State of New York, on or about April 4, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 59

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Saratoga, State of New York, on or about April 8, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 60

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Saratoga, State of New York, on or about April 8, 2024, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 61

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Section 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Saratoga, State of New

York, on or about April 8, 2024, did knowingly and unlawfully 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-eighth ounce or more.

COUNT 62

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Saratoga, State of New York, on or about April 10, 2024, did knowingly and unlawfully sell 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 63

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Saratoga, State of New York, on or about April 10, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 64

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Saratoga, State of New York, on or about April 10, 2024, did knowingly and unlawfully attempt 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 65

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Saratoga, State of New York, on or about April 11, 2024, did knowingly and unlawfully sell 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 66

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in

violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Saratoga, State of New York, on or about April 11, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 67

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Saratoga, State of New York, on or about April 11, 2024, did knowingly and unlawfully attempt 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 68

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Warren, State of New York, on or about April 11, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.



COUNT 69

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Warren, State of New York, on or about April 11, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 70

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Warren, State of New York, on or about April 11, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 71

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Saratoga, State of

New York, on or about April 18, 2024, did knowingly and unlawfully sell 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 72

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Saratoga, State of New York, on or about April 18, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 73

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MACKENZIE SUMNER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MACKENZIE SUMNER, in the County of Saratoga, State of New York, on or about April 18, 2024, did knowingly and unlawfully attempt 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 74

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE, in violation of Section 220.43 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Saratoga, State of New York, on or about May 15, 2024, did knowingly and unlawfully sell 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 75

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Saratoga, State of New York, on or about May 15, 2024, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 76

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Saratoga, State of New York, on or about May 15, 2024, did knowingly and unlawfully 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 77

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Warren, State of New York, on or about May 15, 2024, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 78

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, HEATHER THOMPSON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, HEATHER THOMPSON, in the County of Warren, State of New York, on or about May 15, 2024, did knowingly and unlawfully 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 79

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Saratoga, State of New

York, on or about February 13, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 80

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Saratoga, State of New York, on or about February 14, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 81

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about February 14, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 82

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Saratoga, State of New York, on or about February 16, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 83

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, ALEXANDER BAYNE and JACKSON TUCKER, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, ALEXANDER BAYNE and JACKSON TUCKER, acting in concert, in the County of Westchester, State of New York, on or about February 16, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 84

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Saratoga, State of New York, on or about February 19, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 85

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Warren, State of New York, on or about February 24, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 86

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Warren, State of New York, on or about February 28, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 87

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Saratoga, State of New York, on or about February 29, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 88

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RYAN MEGNA, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RYAN MEGNA, in the County of Saratoga, State of New York, on or about February 29, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 89

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RYAN MEGNA, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RYAN MEGNA, in the County of Saratoga, State of New York, on or about February 29, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 90

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about March 1, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 91

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Saratoga, State of New



York, on or about March 1, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 92

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about March 5, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 93

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RYAN MEGNA, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RYAN MEGNA, in the County of Washington, State of New York, on or about March 5, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 94

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RYAN MEGNA, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RYAN MEGNA, in the County of Washington, State of New York, on or about March 5, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 95

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about March 5, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 96

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, MELISSA STEARNS, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, MELISSA STEARNS, in the County of Washington, State of New York, on or about March 5, 2024, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 97

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, ALEXANDER BAYNE and MELISSA STEARNS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in

violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, ALEXANDER BAYNE and MELISSA STEARNS, acting in concert, in the County of Saratoga, State of New York, on or about March 6, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 98

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about March 6, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 99

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RYAN MEGNA, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RYAN MEGNA, in the County of Washington, State of New York, on or about March 6, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 100

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RYAN MEGNA, of the crime of ATTEMPTED CRIMINAL

POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RYAN MEGNA, in the County of Washington, State of New York, on or about March 6, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 101

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about March 6, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 102

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JACKSON TUCKER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JACKSON TUCKER, in the County of Washington, State of New York, on or about March 6, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 103

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JACKSON TUCKER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JACKSON TUCKER, in the County of Washington, State of New York, on or about March 6, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 104

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Saratoga, State of New York, on or about March 7, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 105

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CONRAD BAYNE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CONRAD BAYNE, in the County of Saratoga, State of New York, on or about March 7, 2024, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine,

with intent to sell it.

COUNT 106

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CONRAD BAYNE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CONRAD BAYNE, in the County of Saratoga, State of New York, on or about March 7, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 107

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Saratoga, State of New York, on or about March 8, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 108

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JERMAINE MORENO, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JERMAINE MORENO, in the County of Rensselaer, State of New York, on or about April 12, 2024, did knowingly and unlawfully sell one or more preparations, compounds, mixtures or substances containing the narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT 109

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, ALEXANDER BAYNE and TREVOR HARRIS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, ALEXANDER BAYNE and TREVOR HARRIS, acting in concert, in the County of Saratoga, State of New York, on or about March 18, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 110

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about March 19, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: heroin.

COUNT 111

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE

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

That the said defendant, ALEXANDER BAYNE, in the County of Saratoga, State of New York, on or about March 21, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 112

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about March 22, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 113

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about April 26, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 114

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LINDSEY MATTISON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in



violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LINDSEY MATTISON, in the County of Washington, State of New York, on or about April 26, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 115

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about April 26, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 116

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about April 28, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 117

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39

(Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about April 29, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 118

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LINDSEY MATTISON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LINDSEY MATTISON, in the County of Washington, State of New York, on or about April 29, 2024, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 119

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about April 30, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 120

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about April 30, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 121

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about May 2, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 122

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about May 3, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 123

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of

New York, on or about May 4, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 124

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of New York, on or about May 6, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 125

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RYAN MEGNA, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RYAN MEGNA, in the County of Washington, State of New York, on or about May 6, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 126

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ALEXANDER BAYNE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ALEXANDER BAYNE, in the County of Washington, State of

New York, on or about May 8, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 127

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RYAN MEGNA, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RYAN MEGNA, in the County of Washington, State of New York, on or about May 8, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 128

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RYAN MEGNA, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RYAN MEGNA, in the County of Washington, State of New York, on or about May 8, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 129

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, TREVOR HARRIS, of the crime of CRIMINAL SALE OF

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

That the said defendant, TREVOR HARRIS, in the County of Orange, State of New York, on or about April 14, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: heroin.

COUNT 130

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, TREVOR HARRIS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, TREVOR HARRIS, in the County of Orange, State of New York, on or about April 14, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 131

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, TREVOR HARRIS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, TREVOR HARRIS, in the County of Warren, State of New York, on or about April 15, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 132

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, TREVOR HARRIS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, TREVOR HARRIS, in the County of Saratoga, State of New York, on or about April 15, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 133

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, TREVOR HARRIS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, TREVOR HARRIS, in the County of Saratoga, State of New York, on or about April 16, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 134

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, TREVOR HARRIS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, TREVOR HARRIS, in the County of Saratoga, State of New York, on or about April 16, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: heroin.

COUNT 135

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, TREVOR HARRIS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, TREVOR HARRIS, in the County of Warren, State of New York, on or about April 26, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 136

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, TREVOR HARRIS, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, TREVOR HARRIS, in the County of Warren, State of New York, on or about April 29, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 137

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, TREVOR HARRIS, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, TREVOR HARRIS, in the County of Saratoga, State of New York, on or about and between May 4, 2024, through May 5, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: heroin, with intent to sell it.

COUNT 138

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about February 29, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.



COUNT 139

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZACHARY BESSETTE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZACHARY BESSETTE, in the County of Warren, State of New York, on or about February 29, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 140

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZACHARY BESSETTE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZACHARY BESSETTE, in the County of Warren, State of New York, on or about February 29, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 141

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York,

on or about March 1, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 142

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about March 8, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 143

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about March 15, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 144

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZACHARY BESSETTE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZACHARY BESSETTE, in the County of Warren, State of New York, on or about March 15, 2024, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 145

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZACHARY BESSETTE, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Section 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZACHARY BESSETTE, in the County of Warren, State of New York, on or about March 15, 2024, did knowingly and unlawfully 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-eighth ounce or more.

COUNT 146

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Washington, State of New York, on or about March 16, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 147

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZACHARY BESSETTE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZACHARY BESSETTE, in the County of Washington, State of New York, on or about March 16, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 148

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZACHARY BESSETTE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZACHARY BESSETTE, in the County of Washington, State of New York, on or about March 16, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 149

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about March 22, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 150

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE, in violation of Section 220.41

(Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about and between March 27, 2024, through March 28, 2024, did knowingly and unlawfully sell 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 151

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZACHARY BESSETTE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZACHARY BESSETTE, in the County of Warren, State of New York, on or about March 28, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 152

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZACHARY BESSETTE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 12) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZACHARY BESSETTE, in the County of Warren, State of New York, on or about March 28, 2024, did knowingly and unlawfully attempt 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 153

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about April 4, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 154

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZACHARY BESSETTE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZACHARY BESSETTE, in the County of Warren, State of New York, on or about April 4, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 155

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, ZACHARY BESSETTE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, ZACHARY BESSETTE, in the County of Warren, State of New York, on or about April 4, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 156

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about April 7, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 157

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about April 9, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 158

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about April 11, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 159

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about April 15, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 160

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about April 16, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 161

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JACK MOULTON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JACK MOULTON, in the County of Warren, State of New York, on or about April 16, 2024, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.



COUNT 162

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JACK MOULTON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Section 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JACK MOULTON, in the County of Warren, State of New York, on or about April 16, 2024, did knowingly and unlawfully 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-eighth ounce or more.

COUNT 163

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about April 17, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 164

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JACK MOULTON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JACK MOULTON, in the County of Warren, State of New York, on or about April 17, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to

wit: cocaine, with intent to sell it.

COUNT 165

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JACK MOULTON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JACK MOULTON, in the County of Warren, State of New York, on or about April 17, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 166

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about April 18, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 167

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York,

on or about April 19, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 168

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JACK MOULTON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JACK MOULTON, in the County of Warren, State of New York, on or about April 19, 2024, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 169

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JACK MOULTON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Section 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JACK MOULTON, in the County of Warren, State of New York, on or about April 19, 2024, did knowingly and unlawfully 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-eighth ounce or more.

COUNT 170

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about April 20, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 171

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JACK MOULTON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JACK MOULTON, in the County of Warren, State of New York, on or about April 20, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 172

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JACK MOULTON, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JACK MOULTON, in the County of Warren, State of New York, on or about April 20, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 173

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, RONNIE LUNA, of the crime of CRIMINAL SALE OF A

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

That the said defendant, RONNIE LUNA, in the County of Warren, State of New York, on or about April 23, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 174

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JACK MOULTON, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JACK MOULTON, in the County of Warren, State of New York, on or about April 23, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 175

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JACK MOULTON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JACK MOULTON, in the County of Warren, State of New York, on or about April 23, 2024, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 176

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, JACK MOULTON, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Section 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JACK MOULTON, in the County of Warren, State of New York, on or about April 23, 2024, did knowingly and unlawfully 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-eighth ounce or more.

COUNT 177

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, KEVIN COOPER, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, KEVIN COOPER, in the County of Warren, State of New York, on or about March 2, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 178

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Warren, State of New York, on or about March 2, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 179

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE,

in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Warren, State of New York, on or about March 2, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 180

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Warren, State of New York, on or about March 8, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 181

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WALTER WINCHELL, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WALTER WINCHELL, in the County of Warren, State of New York, on or about March 8, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 182

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Warren, State of New York, on or about March 14, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 183

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Warren, State of New York, on or about March 18, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 184

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTINE SONDERMEYER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTINE SONDERMEYER, in the County of Warren, State of New York, on or about March 18, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.



COUNT 185

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTINE SONDERMEYER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTINE SONDERMEYER, in the County of Warren, State of New York, on or about March 18, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 186

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Warren, State of New York, on or about March 19, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 187

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTINE SONDERMEYER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTINE SONDERMEYER, in the County of Warren, State

of New York, on or about March 19, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 188

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTINE SONDERMEYER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTINE SONDERMEYER, in the County of Warren, State of New York, on or about March 19, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 189

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Warren, State of New York, on or about March 19, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 190

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WALTER WINCHELL, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in

violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WALTER WINCHELL, in the County of Warren, State of New York, on or about March 19, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 191

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Warren, State of New York, on or about March 20, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 192

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WALTER WINCHELL, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WALTER WINCHELL, in the County of Warren, State of New York, on or about March 20, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 193

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE

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

That the said defendant, LONSDALE STUFFLE, in the County of Warren, State of New York, on or about March 21, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 194

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CASSIDY O'CONNELL, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CASSIDY O'CONNELL, in the County of Warren, State of New York, on or about March 21, 2024, did knowingly and unlawfully possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 195

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CASSIDY O'CONNELL, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CASSIDY O'CONNELL, in the County of Warren, State of New York, on or about March 21, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 196

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Washington, State of New York, on or about March 21, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 197

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTINE SONDERMEYER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTINE SONDERMEYER, in the County of Washington, State of New York, on or about March 21, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 198

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTINE SONDERMEYER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTINE SONDERMEYER, in the County of Washington, State of New York, on or about March 21, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 199

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, LONSDALE STUFFLE and CASSIDY O'CONNELL, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, LONSDALE STUFFLE and CASSIDY O'CONNELL, acting in concert, in the County of Warren, State of New York, on or about March 21, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 200

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Warren, State of New York, on or about March 22, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 201

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTINE SONDERMEYER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTINE SONDERMEYER, in the County of Warren, State

of New York, on or about March 22, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 202

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Washington, State of New York, on or about March 24, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 203

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CASSIDY O'CONNELL, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CASSIDY O'CONNELL, in the County of Washington, State of New York, on or about March 24, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 204

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Washington, State of New York, on or about March 24, 2024, did knowingly and unlawfully sell a narcotic drug, to wit:

cocaine.

COUNT 205

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTINE SONDERMEYER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTINE SONDERMEYER, in the County of Washington, State of New York, on or about March 24, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 206

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTINE SONDERMEYER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTINE SONDERMEYER, in the County of Washington, State of New York, on or about March 24, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 207

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:



That the said defendant, LONSDALE STUFFLE, in the County of Warren, State of New York, on or about March 25, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 208

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTINE SONDERMEYER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTINE SONDERMEYER, in the County of Warren, State of New York, on or about March 25, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 209

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTINE SONDERMEYER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTINE SONDERMEYER, in the County of Warren, State of New York, on or about March 25, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 210

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, LONSDALE STUFFLE and KEVIN COOPER, of the crime

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

That the said defendants, LONSDALE STUFFLE and KEVIN COOPER, acting in concert, in the County of Warren, State of New York, on or about April 4, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 211

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Warren, State of New York, on or about April 4, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 212

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CHRISTINE SONDERMEYER, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CHRISTINE SONDERMEYER, in the County of Warren, State of New York, on or about April 4, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 213

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39

(Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Warren, State of New York, on or about April 7, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 214

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CASSIDY O'CONNELL, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CASSIDY O'CONNELL, in the County of Warren, State of New York, on or about April 7, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 215

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CASSIDY O'CONNELL, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CASSIDY O'CONNELL, in the County of Warren, State of New York, on or about April 7, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 216

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE

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

That the said defendant, LONSDALE STUFFLE, in the County of Saratoga, State of New York, on or about April 8, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 217

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CASSIDY O'CONNELL, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CASSIDY O'CONNELL, in the County of Saratoga, State of New York, on or about April 8, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 218

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, CASSIDY O'CONNELL, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of Sections 110.00 and 220.09 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, CASSIDY O'CONNELL, in the County of Saratoga, State of New York, on or about April 8, 2024, did knowingly and unlawfully attempt 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-eighth ounce or more.

COUNT 219

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, LONSDALE STUFFLE, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, LONSDALE STUFFLE, in the County of Warren, State of New York, on or about April 11, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 220

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendant, WALTER WINCHELL, of the crime of ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Sections 110.00 and 220.16 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendant, WALTER WINCHELL, in the County of Warren, State of New York, on or about April 11, 2024, did knowingly and unlawfully attempt to possess a narcotic drug, to wit: cocaine, with intent to sell it.

COUNT 221

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, further accuses the above-named defendants, LONSDALE STUFFLE, and CASSIDY O'CONNELL, of the crime of CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39 (Subdivision 1) of the Penal Law of the State of New York, committed as follows:

That the said defendants, LONSDALE STUFFLE and CASSIDY O'CONNELL, acting in concert, in the County of Warren, State of New York, on or about April 11, 2024, did knowingly and unlawfully sell a narcotic drug, to wit: cocaine.

COUNT 222

THE GRAND JURY OF THE COUNTY OF SARATOGA, by this Indictment, accuses the above-named defendant, JERMAINE MORENO, of the crime of OPERATING AS A MAJOR TRAFFICKER, in violation of Section 220.77 (Subdivision 3) of the Penal Law of the State of New York, committed as follows:

That the said defendant, JERMAINE MORENO, in the Counties of Albany and Rensselaer, and elsewhere in the State of New York, on or about March 13, 2024, through May 2, 2024, acting in concert with others, as a profiteer, did knowingly and unlawfully possess, on one or more occasions within six months or less, a narcotic drug with intent to sell the same, and such narcotic drugs have a total aggregate value of seventy-five thousand dollars or more.

Dated: September \_\_\_\_, 2024

Saratoga, New York

\_\_\_\_\_  
Grand Jury Foreperson

NICOLE KEARY  
Deputy Attorney General  
N.Y.S. Attorney General's Organized Crime Task Force

By: \_\_\_\_\_  
Michael A. Sharpe  
Assistant Deputy Attorney General  
N.Y.S. Attorney General's Organized Crime Task Force