

STATE OF NEW YORK
SUPREME/COUNTY COURT : COUNTY OF ERIE

THE PEOPLE OF THE STATE OF NEW YORK,

-v-

SEALED INDICTMENT
NO. _____
OCTF 21-006B

CHARLES SIMS,
MUSA RAMADAN,
MICHAEL CLARK, JR.,
ERIC RICHMOND,
TEVIN JETER,
ANTHONY FUGATE,
MICHAEL MCPHEE,
JASPER LEWIS,
RONNIE CASON,
MELANIE DUCHNIK,
DEVON JONES, a/k/a "DUTCH,"
NEGMARIE MARCANO,
RONALD WASHINGTON, and
TAJINE BENNING,

Defendants.

FIRST COUNT

THE GRAND JURY OF THE COUNTY OF ERIE, by this Indictment, accuses the defendants, RONNIE CASON, MICHAEL CLARK, JR., MELANIE DUCHNIK, ANTHONY FUGATE, TEVIN JETER, DEVON JONES, A/K/A "DUTCH," JASPER LEWIS, NEGMARIE MARCANO, MICHAEL MCPHEE, MUSA RAMADAN, ERIC RICHMOND, CHARLES SIMS, and RONALD WASHINGTON, of the crime of **CONSPIRACY IN THE SECOND DEGREE**, in violation of Section 105.15 of the Penal Law of the State of New York, committed as follows:

The defendants, in Erie County, Monroe County, Niagara County, in the State of New York and elsewhere, from on or before August 4, 2021, through on or about March 28, 2022, with intent

that conduct constituting the crimes of Criminal Possession of a Controlled Substance in the First Degree, Criminal Possession of a Controlled Substance in the Second Degree, Criminal Sale of a Controlled Substance in the First Degree, and/or Criminal Sale of a Controlled Substance in the Second Degree, said crimes being Class A felonies, be committed, did knowingly and intentionally agree with each other and with others, known and unknown, to engage in and cause the performance of such conduct as would constitute any one or more of the above-mentioned class A felonies.

PREAMBLE

It was the purpose of this conspiracy to possess narcotics in amounts of four ounces or more and/or to sell narcotics in amounts of one-half ounce or more in Erie County, Monroe County, Niagara County, and elsewhere in the State of New York, and elsewhere.

It was the role of CHARLES SIMS to procure narcotics from MUSA RAMADAN, ERIC RICHMOND, TEVIN JETER, and others for redistribution to DEVON JONES, A/K/A "DUTCH," JASPER LEWIS, MICHAEL MCPHEE, GREGORY MILLER and others.

It was the role of MUSA RAMADAN to supply CHARLES SIMS, NEGMARIE MARCANO, RONALD WASHINGTON, and others with narcotics to sell.

It was the role of ERIC RICHMOND to supply CHARLES SIMS and others with narcotics to sell.

It was the role of ANTHONY FUGATE to procure narcotics from MICHAEL CLARK, JR. and others for redistribution to MELANIE DUCHNIK, RONNIE CASON, and others.

It was the role of MICHAEL CLARK, JR. to supply ANTHONY FUGATE, MELANIE DUCHNIK, GREGORY MILLER and others with narcotics to sell.

It was the role of TEVIN JETER to supply CHARLES SIMS and others with narcotics to sell.

It was the role of DEVON JONES, A/K/A “DUTCH,” JASPER LEWIS, and MICHAEL MCPHEE to procure narcotics from CHARLES SIMS for redistribution to others.

It was the role of NEGMARIE MARCANO and RONALD WASHINGTON to procure narcotics from MUSA RAMADAN for redistribution to others.

It was the role of MELANIE DUCHNIK and RONNIE CASON to procure narcotics from MICHAEL CLARK, JR. and ANTHONY FUGATE for redistribution to others.

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

OVERT ACTS

In furtherance of the conspiracy and to affect the objects thereof, from on or about and between August 4, 2021, through on or about March 28, 2022, the following overt acts, among others, were committed:

1. On or about August 18, 2021, CHARLES SIMS delivered cocaine to Gregory Miller, who is an unindicted co-conspirator, in the city of Buffalo, and waited as Miller immediately sold the cocaine to a person known to the grand jury.

2. On or about August 20, 2021, MICHAEL CLARK, JR. delivered pills containing fentanyl to Gregory Miller, who is an unindicted co-conspirator, in the city of Buffalo, and waited as Miller immediately sold the controlled substances to a person known to the grand jury.

3. On or about September 14, 2021, MICHAEL CLARK, JR. delivered pills containing fentanyl to Gregory Miller, who is an unindicted co-conspirator, in the city of Buffalo, and waited as Miller immediately sold the controlled substances to a person known to the grand jury.

4. On or about November 10, 2021, in a series of coded, guarded and/or cryptic telephone conversations, ANTHONY FUGATE ordered “fifty”, referring to a quantity of pills

containing fentanyl, from MICHAEL CLARK, JR. on behalf of one of his customers, and then arranged for MICHAEL CLARK, JR. to deliver the pills to directly the customer.

5. On or about November 23, 2021, in a series of coded, guarded and/or cryptic telephonic communications, MELANIE DUCHNIK ordered “100”, referring to a quantity of pills containing fentanyl, from ANTHONY FUGATE.

6. On or about November 23, 2021, in a series of coded, guarded and/or cryptic telephonic communications, TEVIN JETER and CHARLES SIMS discussed JETER’s collection of money from SIMS on behalf of “Primo”, JETER’S cocaine source of supply of cocaine.

7. On or about November 23, 2021, TEVIN JETER met CHARLES SIMS at SIMS’ residence in the city of Buffalo in furtherance of their narcotics trafficking activities.

8. On or about December 8, 2021, RONNIE CASON possessed approximately 50 counterfeit prescription pills containing a narcotic drug.

9. On or about December 8, 2021, in a series of coded, guarded and/or cryptic telephone conversations, MELANIE DUCHNIK told ANTHONY FUGATE, “Lay low, my dude left and got pulled over,” referring to law enforcement’s interdiction of RONNIE CASON earlier that evening.

10. On or about December 23, 2021, JASPER LEWIS drove to CHARLES SIMS’ residence in the city of Buffalo to procure cocaine.

11. On or about January 3, 2022, in a series of coded, guarded and/or cryptic telephone conversations, MICHAEL MCPHEE ordered a quantity of cocaine from CHARLES SIMS.

12. On or about January 3, 2022, JASPER LEWIS drove to CHARLES SIMS’ residence in the city of Buffalo to procure cocaine from SIMS on behalf of MICHAEL MCPHEE.

13. On or about January 18, 2022, ERIC RICHMOND delivered a quantity of cocaine to CHARLES SIMS at SIMS’ residence in the city of Buffalo.

14. On or about January 19, 2022, in a coded, guarded and/or cryptic telephone conversation, ERIC RICHMOND and CHARLES SIMS discussed the quality of the cocaine that RICHMOND had previously delivered to SIMS, with RICHMOND stating, “that shit is like A-one though.” SIMS agreed and noted, “... the look and ... my smelling, knowing coke and knowing what it feels like ... it’s, it’s great.”

15. On or about February 2, 2022, in a coded, guarded and/or cryptic telephone conversation, DEVON JONES, A/K/A “DUTCH,” asked CHARLES SIMS, “What was you gimme for the deuce?”, referring to two ounces of cocaine, and SIMS replied, “twenty two fifty,” meaning \$2,250.

16. On or about February 9, 2022, DEVON JONES, A/K/A “DUTCH,” drove to CHARLES SIMS’ residence in the city of Buffalo to procure cocaine from SIMS.

17. On or about February 16, 2022, in a coded, guarded and/or cryptic telephone conversation, NEGMARIE MARCANO placed an order for a controlled substance with MUSA RAMADAN, and noted that she needs “three of the small ones, but the other way. Not fentanyl.”

18. On or about February 16, 2022, in a coded, guarded and/or cryptic telephone conversation, NEGMARIE MARCANO asked MUSA RAMADAN how much it would cost for “nine pieces of chicken”, referring to a quantity of cocaine, and RAMADAN replied, “four, eight each.”

19. On or about February 16, 2022, in a series of coded, guarded and/or cryptic telephone communications, MICHAEL MCPHEE arranged to purchase cocaine from CHARLES SIMS and asked SIMS to deliver the cocaine to him.

20. On or about February 17, 2022, in a series of coded, guarded and/or cryptic telephone conversations, MUSA RAMADAN arranged to procure narcotics proceeds from

CHARLES SIMS, who noted that he presently had “twenty-eight,” referring to \$28,000, and was still waiting for other customers.

21. On or about March 4, 2022, in a coded, guarded and/or cryptic telephone conversation, RONALD WASHINGTON asked MUSA RAMADAN to supply him with cocaine and noted that his customers had complained that the cocaine that RAMADAN had previously supplied to him was “shaky.”

22. On or about March 7, 2022, CHARLES SIMS delivered a quantity of cocaine to MICHAEL MCPHEE in Lockport, Niagara County, New York.

23. On or about March 25, 2022, RONALD WASHINGTON drove to MUSA RAMADAN’s residence in the city of Buffalo to procure cocaine from RAMADAN.

24. On or about March 28, 2022, CHARLES SIMS possessed more than four ounces of cocaine at his residence in the city of Buffalo.

25. On or about March 28, 2022, MUSA RAMADAN possessed more than eight ounces of cocaine at his residence in the city of Buffalo.

SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 18th day of August 2021, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 18th day of August 2021, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 18th day of August 2021, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL CLARK, JR., of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, in that he, the said MICHAEL CLARK, JR., on or about the 20th day of August 2021, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and

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

SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL CLARK, JR., of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said MICHAEL CLARK, JR., on or about the 20th day of August 2021, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with the intent to sell it.

SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL CLARK, JR., of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, in that he, the said MICHAEL CLARK, JR., on or about the 20th day of August 2021, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL CLARK, JR., of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, in that he, the said MICHAEL CLARK, JR., on or about the 14th day of September 2021, in Erie County, knowingly and unlawfully sold one or more

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

NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL CLARK, JR., of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said MICHAEL CLARK, JR., on or about the 14th day of September 2021, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with the intent to sell it.

TENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL CLARK, JR., of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, in that he, the said MICHAEL CLARK, JR., on or about the 14th day of September 2021, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

ELEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL CLARK, JR., of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, in that he, the said MICHAEL CLARK, JR., on or

about the 3rd day of November 2021, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

TWELFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL CLARK, JR., of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said MICHAEL CLARK, JR., on or about the 3rd day of November 2021, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with the intent to sell it.

THIRTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL CLARK, JR., of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, in that he, the said MICHAEL CLARK, JR., on or about the 3rd day of November 2021, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

FOURTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1)

of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 4th day of November 2021, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

FIFTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.18(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 4th day of November 2021, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

SIXTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 4th day of November 2021, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

SEVENTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, MICHAEL CLARK, JR. and ANTHONY FUGATE, of the crime of

CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that they, the said MICHAEL CLARK, JR. and ANTHONY FUGATE, acting in concert, on or about the 11th day of November 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

EIGHTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about and between the 11th and 13th days of November 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

NINETEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, MICHAEL CLARK, JR. and ANTHONY FUGATE, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that they, the said MICHAEL CLARK, JR. and ANTHONY FUGATE, acting in concert, on or about the 12th day of November 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

TWENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, MICHAEL CLARK, JR. and ANTHONY FUGATE, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in

violation of Section 220.39(1) of the Penal Law of the State of New York, in that they, the said MICHAEL CLARK, JR. and ANTHONY FUGATE, acting in concert, on or about the 14th day of November 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

TWENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, MICHAEL CLARK, JR. and ANTHONY FUGATE, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that they, the said MICHAEL CLARK, JR. and ANTHONY FUGATE, acting in concert, on or about the 16th day of November 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

TWENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MELANIE DUCHNIK, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that she, the said MELANIE DUCHNIK, on or about the 16th day of November 2021, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: fentanyl, with the intent to sell it.

TWENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, ANTHONY FUGATE, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said ANTHONY FUGATE, on or about

the 20th day of November 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

TWENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MELANIE DUCHNIK, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, in that she, the said MELANIE DUCHNIK, on or about the 20th day of November 2021, in Erie County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl, with the intent to sell it.

TWENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, TEVIN JETER, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said TEVIN JETER, on or about and between the 21st and 22nd days of November 2021, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

TWENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, TEVIN JETER, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said TEVIN JETER, on or about and

between the 21st and 22nd days of November 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

TWENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, TEVIN JETER, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that he, the said TEVIN JETER, on or about and between the 21st and 22nd days of November 2021, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

TWENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, TEVIN JETER, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said TEVIN JETER, on or about and between the 21st and 22nd days of November 2021, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

TWENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 22nd day of November 2021, in Erie County, knowingly and unlawfully possessed one or more

preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

THIRTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 22nd day of November 2021, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

THIRTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, MICHAEL CLARK, JR. and ANTHONY FUGATE, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that they, the said MICHAEL CLARK, JR. and ANTHONY FUGATE, acting in concert, on or about the 23rd day of November 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

THIRTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MELANIE DUCHNIK, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, in that she, the said MELANIE DUCHNIK, on or about the 23rd day of November 2021, in Erie County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl, with the intent to sell it.

THIRTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 23rd day of November 2021, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

THIRTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 23rd day of November 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

THIRTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 23rd day of November 2021, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces

or more.

THIRTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 23rd day of November 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

THIRTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, MICHAEL CLARK, JR. and ANTHONY FUGATE, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that they, the said MICHAEL CLARK, JR. and ANTHONY FUGATE, acting in concert, on or about the 24th day of November 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

THIRTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MELANIE DUCHNIK, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, in that she, the said MELANIE DUCHNIK, on or about the 24th day of November 2021, in Erie County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl, with the intent to sell it.

THIRTY-NINTH COUNT

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

accuses the defendants, MICHAEL CLARK, JR. and ANTHONY FUGATE, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that they, the said MICHAEL CLARK, JR. and ANTHONY FUGATE, acting in concert, on or about the 28th day of November 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

FORTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MELANIE DUCHNIK, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, in that she, the said MELANIE DUCHNIK, on or about the 28th day of November 2021, in Erie County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl, with the intent to sell it.

FORTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, MICHAEL CLARK, JR. and ANTHONY FUGATE, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that they, the said MICHAEL CLARK, JR. and ANTHONY FUGATE, acting in concert, on or about the 3rd day of December 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: fentanyl.

FORTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MELANIE DUCHNIK, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, in that she, the said

MELANIE DUCHNIK, on or about the 3rd day of December 2021, in Erie County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: fentanyl, with the intent to sell it.

FORTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, ANTHONY FUGATE, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said ANTHONY FUGATE, on or about the 8th day of December 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: a fentanyl analog.

FORTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, RONNIE CASON and MELANIE DUCHNIK, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that they, the said RONNIE CASON and MELANIE DUCHNIK, acting in concert, on or about the 8th day of December 2021, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: a fentanyl analog, with the intent to sell it.

FORTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, RONNIE CASON and MELANIE DUCHNIK, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE**, in violation of Section 220.09(1) of the Penal Law of the State of New York, in that they, the said RONNIE CASON and MELANIE DUCHNIK, acting in concert, on or about the 8th day of December 2021, in Erie County, knowingly and unlawfully possessed one or more

preparations, compounds, mixtures or substances containing a narcotic drug, to wit: a fentanyl analog, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

FORTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 23rd day of December 2021, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

FORTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, JASPER LEWIS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said JASPER LEWIS, on or about the 23rd day of December 2021, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

FORTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 3rd day of January 2022, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said

preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

FORTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 3rd day of January 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

FIFTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, MICHAEL MCPHEE and JASPER LEWIS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that they, the said MICHAEL MCPHEE and JASPER LEWIS, acting in concert, on or about the 3rd day of January 2022, in Erie County and elsewhere, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

FIFTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendants, MICHAEL MCPHEE and JASPER LEWIS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, in that they, the said MICHAEL MCPHEE and JASPER LEWIS, acting in concert, on or about the 3rd day of January 2022, in Erie County and elsewhere, knowingly and unlawfully possessed one or more preparations,

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

FIFTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, ERIC RICHMOND, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said ERIC RICHMOND, on or about the 18th day of January 2022, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

FIFTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, ERIC RICHMOND, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said ERIC RICHMOND, on or about the 18th day of January 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

FIFTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, ERIC RICHMOND, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that he, the said ERIC RICHMOND, on or about

the 18th day of January 2022, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

FIFTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, ERIC RICHMOND, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said ERIC RICHMOND, on or about the 18th day of January 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

FIFTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 18th day of January 2022, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

FIFTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1)

of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 18th day of January 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

FIFTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 20th day of January 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

FIFTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 20th day of January 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

SIXTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, ERIC RICHMOND, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that he, the said ERIC RICHMOND, on or about the 22nd day of January 2022, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and

said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

SIXTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, ERIC RICHMOND, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said ERIC RICHMOND, on or about the 22nd day of January 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

SIXTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about and between the 25th and 29th days of January 2022, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

SIXTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about

and between the 25th and 29th days of January 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

SIXTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN on or about the 29th day of January 2022, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

SIXTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about the 29th day of January 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

SIXTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS on or about the 29th day of January 2022, in Erie County, knowingly and unlawfully possessed one or more

preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

SIXTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 29th day of January 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

SIXTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 26th day of January 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

SIXTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 26th day of January 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

SEVENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, TAJINE BENNING, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Section 265.03(3) of the Penal Law of the State of New York, in that he, the said TAJINE BENNING, on or about the 26th day of January 2022, in Erie County, knowingly and unlawfully possessed a loaded firearm, to wit: a loaded .45 caliber pistol, and said possession did not take place in the defendant's home or place of business.

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

SEVENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, TAJINE BENNING, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE**, in violation of Section 220.06(5) of the Penal Law of the State of New York, in that he, the said TAJINE BENNING, on or about the 26th day of January 2022, in Erie County, knowingly and unlawfully possessed cocaine and said cocaine weighed five hundred milligrams or more.

SEVENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 7th day of February 2022, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said

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

SEVENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 7th day of February 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

SEVENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 8th day of February 2022, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

SEVENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 8th day of February 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit:

cocaine.

SEVENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 15th day of February 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

SEVENTH-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, DEVON JONES, A/K/A “DUTCH,” of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, in that he, the said DEVON JONES, A/K/A “DUTCH,” on or about the 15th day of February 2022, in Erie County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine, with the intent to sell it.

SEVENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about and between the 15th and 16th days of February 2022, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate

weight of two ounces or more.

SEVENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about and between the 15th and 16th days of February 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

EIGHTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, NEGMARIE MARCANO, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, in that she, the said NEGMARIE MARCANO, on or about the 16th day of February 2022, in Erie County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine, with the intent to sell it.

EIGHTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 16th day of February 2022, in Niagara County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

EIGHTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 16th day of February 2022, in Niagara County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

EIGHTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL MCPHEE, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Sections 110.00 and 220.16(1) of the Penal Law of the State of New York, in that he, the said MICHAEL MCPHEE, on or about the 16th day of February 2022, in Niagara County, knowingly and unlawfully attempted to possess a narcotic drug, to wit: cocaine, with the intent to sell it.

EIGHTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL MCPHEE, of the crime of **ATTEMPTED CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Sections 110.00 and 220.16(12) of the Penal Law of the State of New York, in that he, the said MICHAEL MCPHEE, on or about the 16th day of February 2022, in Niagara County, knowingly and unlawfully attempted to possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

EIGHTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, ERIC RICHMOND, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said ERIC RICHMOND, on or about and between the 16th and 17th days of February 2022, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

EIGHTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, ERIC RICHMOND, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said ERIC RICHMOND, on or about and between the 16th and 17th days of February 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

EIGHTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, ERIC RICHMOND, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that he, the said ERIC RICHMOND, on or about and between the 16th and 17th days of February 2022, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic

drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

EIGHTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, ERIC RICHMOND, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said ERIC RICHMOND, on or about and between the 16th and 17th days of February 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

EIGHTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 17th day of February 2022, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

NINETIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the

17th day of February 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

NINETY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 24th day of February 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

NINETY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, DEVON JONES, A/K/A “DUTCH,” of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said DEVON JONES, A/K/A “DUTCH,” on or about the 24th day of February 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

NINETY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about the 1st day of March 2022, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces

or more.

NINETY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about 1st day of March 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

NINETY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about the 1st day of March 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

NINETY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about the 1st day of March 2022, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

NINETY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, RONALD WASHINGTON, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said RONALD WASHINGTON, on or about the 1st day of March 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

NINETY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about and between the 1st and 3rd days of March 2022, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

NINETY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about and between the 1st and 3rd days of March 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDREDTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about and between the 1st and 3rd days of March 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

ONE HUNDRED FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, NEGMARIE MARCANO, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that she, the said NEGMARIE MARCANO, on or about the 3rd day of March 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

ONE HUNDRED SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about and between the 4th and 7th days of March 2022, in Niagara County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

ONE HUNDRED THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about and between the 4th and 7th days of March 2022, in Niagara County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL MCPHEE, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said MICHAEL MCPHEE, on or about the 7th day of March 2022, in Niagara County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

ONE HUNDRED FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL MCPHEE, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, in that he, the said MICHAEL MCPHEE, on or about the 7th day of March 2022, in Niagara County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

ONE HUNDRED SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 9th day of March 2022, in Niagara County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

ONE HUNDRED SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 9th day of March 2022, in Niagara County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL MCPHEE, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said MICHAEL MCPHEE, on or about the 9th day of March 2022, in Niagara County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

ONE HUNDRED NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL MCPHEE, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(12) of the Penal Law of the State of New York, in that he, the said MICHAEL MCPHEE, on or about the 9th day of March 2022, in Niagara County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

ONE HUNDRED TENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 13th day of March 2022, in Niagara County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED ELEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MICHAEL MCPHEE, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said MICHAEL MCPHEE, on or about the 13th day of March 2022, in Niagara County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

ONE HUNDRED TWELVETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.41(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about the 18th day of March 2022, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

ONE HUNDRED THIRTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about the 18th day of March 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED FOURTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.43(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about the 25th day of March 2022, in Erie County, knowingly and unlawfully sold one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and

said preparations, compounds, mixtures or substances were of an aggregate weight of two ounces or more.

ONE HUNDRED FIFTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.39(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about the 25th day of March 2022, in Erie County, knowingly and unlawfully sold a narcotic drug, to wit: cocaine.

ONE HUNDRED SIXTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, RONALD WASHINGTON, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.18(1) of the Penal Law of the State of New York, in that he, the said RONALD WASHINGTON, on or about the 25th day of March 2022, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

ONE HUNDRED SEVENTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, RONALD WASHINGTON, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said RONALD WASHINGTON, on or about the 25th day of March 2022, in Erie County, knowingly and

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

ONE HUNDRED EIGHTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Section 220.18(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 28th day of March 2022, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of four ounces or more.

ONE HUNDRED NINETEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 28th day of March 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

ONE HUNDRED TWENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE**, in violation of Section 220.50(2) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 28th day of March 2022, in Erie County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of narcotic drugs or stimulants

under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use the same for the purpose of unlawfully manufacturing, packaging, or dispensing of any narcotic drug or stimulant.

ONE HUNDRED TWENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE**, in violation of Section 220.50(3) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about the 28th day of March 2022, in Erie County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use the same for the purpose of unlawfully manufacturing, packaging, or dispensing of any narcotic drug or stimulant.

ONE HUNDRED TWENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIRST DEGREE**, in violation of Section 220.21(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about the 28th day of March 2022, in Erie County, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, to wit: cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of eight ounces or more.

ONE HUNDRED TWENTY-THIRD COUNT

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

accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Section 220.16(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about the 28th day of March 2022, in Erie County, knowingly and unlawfully possessed a narcotic drug, to wit: cocaine, with the intent to sell it.

ONE HUNDRED TWENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE**, in violation of Section 220.50(1) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about the 28th day of March 2022, in Erie County, knowingly possessed diluents, dilutants or adulterants, including but not limited to, any of the following: quinine hydrochloride, mannitol, mannite, lactose or dextrose, adapted for the dilution of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use, the same for purposes of unlawfully mixing, compounding or otherwise preparing any narcotic drug or stimulant.

ONE HUNDRED TWENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE**, in violation of Section 220.50(2) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about the 28th day of March 2022, in Erie County, knowingly possessed gelatin capsules, glassine envelopes, vials, capsules or any other material suitable for the packaging of narcotic drugs or stimulants under circumstances evincing an intent to use, or under circumstances evincing knowledge that

some person intends to use the same for the purpose of unlawfully manufacturing, packaging, or dispensing of any narcotic drug or stimulant.

ONE HUNDRED TWENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, MUSA RAMADAN, of the crime of **CRIMINALLY USING DRUG PARAPHERNALIA IN THE SECOND DEGREE**, in violation of Section 220.50(3) of the Penal Law of the State of New York, in that he, the said MUSA RAMADAN, on or about the 28th day of March 2022, in Erie County, knowingly possessed scales and balances used or designed for the purpose of weighing or measuring controlled substances, under circumstances evincing an intent to use, or under circumstances evincing knowledge that some person intends to use the same for the purpose of unlawfully manufacturing, packaging, or dispensing of any narcotic drug or stimulant.

ONE HUNDRED TWENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, ERIC RICHMOND, of the crime of **CRIMINAL POSSESSION OF CANNABIS IN THE FIRST DEGREE**, in violation of Section 222.40(1) of the Penal Law of the State of New York, in that he, the said ERIC RICHMOND, on or about the 28th day of March 2022 in, Erie County, knowingly and unlawfully possessed cannabis and such cannabis weighed more than ten pounds.

ONE HUNDRED TWENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **OPERATING AS A MAJOR TRAFFICKER**, in violation of Section 220.77(2) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about and between the 21st day of October 2021 and the

28th day of March 2022, in Erie County and elsewhere, as a profiteer, knowingly and unlawfully sold, on one or more occasions within six months or less, a narcotic drug, to wit: cocaine, and the proceeds collected or due from such sale or sales had a total aggregate value of seventy-five thousand dollars or more.

ONE HUNDRED TWENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF ERIE, by this indictment, further accuses the defendant, CHARLES SIMS, of the crime of **OPERATING AS A MAJOR TRAFFICKER**, in violation of Section 220.77(3) of the Penal Law of the State of New York, in that he, the said CHARLES SIMS, on or about and between the 21st day of October 2021 and the 28th day of March 2022, in Erie County and elsewhere, as a profiteer, knowingly and unlawfully possessed, on one or more occasions within six months or less, a narcotic drug, to wit: cocaine, with the intent to sell same, and such narcotic drugs had a total a total aggregate value of seventy-five thousand dollars or more.

NICOLE KEARY
Deputy Attorney General
New York State Organized Crime Task Force

BY: NATHANAEL KAPPERMAN
Assistant Deputy Attorney General
New York State Organized Crime Task Force

Acting Foreperson
Erie County Grand Jury

Dated: October ____, 2022